

EBA/DP/2026/02

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Discussion Paper

Discussion Paper on Pillar 3 Data Hub process to SNCIs

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1. Responding to this Discussion Paper

The EBA invites comments on all proposals put forward in this discussion paper and in particular on the specific questions included in Annex II.

Comments are most helpful if they:

- respond to the question stated;
- indicate the specific point to which a comment relates;
- contain a clear rationale;
- provide evidence to support the view expressed;
- describe any alternatives the EBA should consider; and
- provide where possible data for a cost and benefit analysis.

Submission of responses

To submit your comments, click on the 'send your comments' button on the consultation page by 20.07.2026. Please note that comments submitted after this deadline, or submitted via other means, may not be processed.

Publication of responses

Please clearly indicate in the consultation form if you wish your comments to be disclosed or to be treated as confidential. A confidential response may be requested from us in accordance with the EBA's rules on public access to documents. We may consult you if we receive such a request. Any decision we make not to disclose the response is reviewable by the EBA's Board of Appeal and the European Ombudsman.

Data protection

The protection of individuals with regard to the processing of personal data by the EBA is based on Regulation (EU) 1725/2018 of the European Parliament and of the Council of 23 October 2018. Further information on data protection can be found under the [Legal notice section](#) of the EBA website.

Disclaimer

The views expressed in this discussion paper are preliminary and will not bind in any way the EBA in the future implementation of the Pillar 3 Data Hub (P3DH) process to Small and Non-Complex Institutions (SNCIs). They are aimed at eliciting discussion and gathering the stakeholders' opinion before this implementation.

2. Executive Summary

The Pillar 3 Data Hub ('P3DH' or 'data hub') is a centralised platform on the EBA website¹ that facilitates the access to Pillar 3 information by all users, covering the full set of requirements under the Pillar 3 disclosure framework. Information can be visualised making use of the available tool and raw data can be downloaded for a single institution/template or a group of selected institutions/ templates. On 26 January 2026, the P3DH went live for large and other institutions. The centralised Pillar 3 disclosures already submitted by these institutions to the EBA are available from the June 2025 reference date. Pillar 3 information is produced by institutions and published by the EBA without any transformation.

The EBA is now implementing the extension of the P3DH process to Small and Non-Complex Institutions (SNCIs)². For these institutions, the EBA is mandated to prepare and publish the Pillar 3 disclosures based on supervisory reporting data submitted to competent authorities.

This discussion paper focuses on the process to be followed for SNCIs, including the calculation methodology to be followed when preparing the Pillar 3 disclosures on behalf of the institutions. It also outlines the next steps and the expected timeline for the first publication. As regards the supervisory data that is still not available to the EBA under the reporting framework to perform the computation of the Pillar 3 data points, a public consultation is currently ongoing until 10 July 2026 (Consultation Paper on the revisions to the ITS on supervisory reporting - Commission Implementing Regulation (EU) 2024/3117³ - from now onwards, "consultation paper on the ITS on supervisory reporting" or "consultation paper"). The calculation methodology is currently subject to testing. The feedback received so far on the direction taken by the EBA regarding its work on SNCIs has been largely positive⁴. This discussion paper is intended to conduct a final round of consultation with the industry. An overview of the planned process / next steps is provided below:

¹ [P3DH](#)

² The classification of institutions as large, other or SNCI follows the definitions under Article 4 of the CRR (large institution under paragraph 1(146); small and non-complex institution under paragraph 1(145); other institution classification corresponds to those institutions that do not fall in any of the other two categories).

³ [Consultation module - Alignment with P3 disclosures for SNCIs | European Banking Authority](#)

⁴ Initially, stakeholder input was gathered through the Discussion Paper published in December 2023 ([link](#)), followed by a series of informal outreach sessions organised with banking associations.

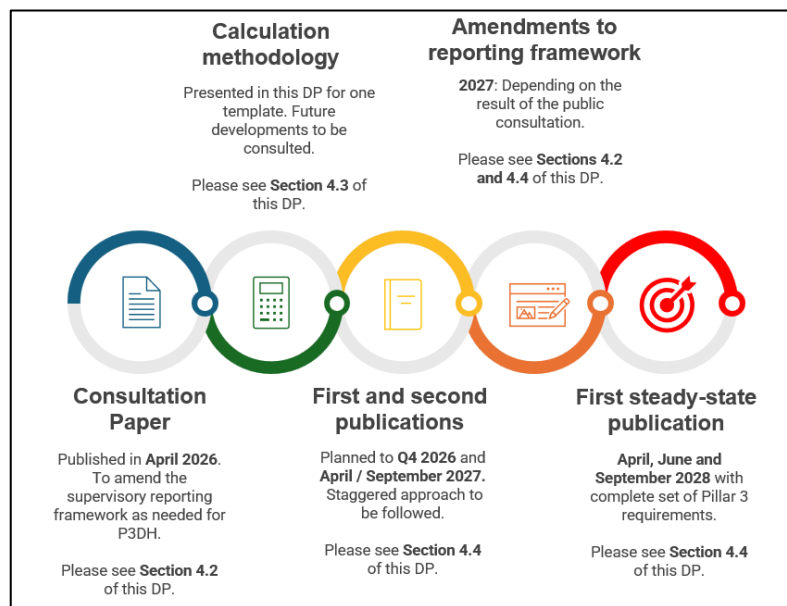


Figure 1: Overview of process / next steps

A centralised process for the calculation and publication of Pillar 3 information through the EBA P3DH is intended to alleviate the operational costs currently borne by institutions in managing their own disclosure processes. By centralising these tasks, institutions will no longer be required to maintain individual disclosure channels. In addition, the availability of a single access point for all relevant information constitutes a substantial improvement in terms of transparency, comparability and data accessibility for all P3DH users, including institutions and supervisors, further supporting market discipline. The implementation of the P3DH for SNCIs is expected to reduce the costs associated with compliance with Pillar 3 disclosure requirements, as—unlike for large and other institutions—the relevant disclosure figures for SNCIs will be centrally calculated and disclosed by the EBA.

In this context, it is also important to emphasize that the number of requirements applicable to SNCIs is significantly lower than those imposed on large and other institutions. For non-listed SNCIs, the obligations are currently limited to a single reporting template (EU KM1) under Article 447 CRR⁵. As a result, establishing a process to calculate the relevant figures for SNCIs is entirely manageable.

Building on the experience gained from the implementation of the P3DH for large and other institutions, a pilot exercise will be launched in due course with a group of volunteering SNCIs. This pilot will provide a structured opportunity for deeper engagement with institutions, enabling a detailed discussion of the key features of the framework and the various steps of the process, as well as the identification of potential refinements ahead of broader implementation.

⁵ From December 2027 non-listed SNCIs will also be subject to ESG disclosure requirements under Article 449a CRR.

Next steps

Following the consultation period on this discussion paper, the EBA will finalise the process considering the feedback received from the industry. In addition, a pilot exercise will be launched with some volunteering SNCIs to discuss further details on the process and test the calculation methodology ahead of the first P3DH going live for SNCIs. The first publication, covering a reduced set of Pillar 3 requirements for listed SNCIs, is planned to Q4 2026 with reference date December 2025.

As regards the publication in 2027, different options are presented in this discussion paper on which feedback from the industry would be very much welcomed.

In 2027, depending on the results from the consultation on the ITS on supervisory reporting, the necessary amendments will be reflected in the EBA's Data Point Model. A complete publication of all Pillar 3 requirements applicable to SNCIs is envisaged in 2028, with reference date December 2027.

Below, an overview of the tentative timeline is provided:



Figure 2: Tentative timeline

3. Background and rationale

Pillar 3 disclosure requirements for institutions are established under the Commission Implementing Regulation (EU) 2024/3172⁶ with regard to public disclosures of the information referred to in Part Eight of the Capital Requirements Regulation (CRR)⁷. As regards credit institutions, the EU Pillar 3 framework is complemented by the ITS on total loss absorption capacity (TLAC) and minimum requirement for own funds and eligibility liabilities (MREL) disclosure and reporting⁸, which include in a single package the disclosure and reporting requirements on eligible liabilities (TLAC and MREL), following the mandates included in the Articles 430 and 434a of the CRR and Article 45i of Directive (EU) 2019/879 (BRRD2).

While under CRR2⁹, in force until 9 July 2024, institutions were required to disclose Pillar 3 information in electronic format and in a single medium or location (normally on their website), CRR3¹⁰ introduced new provisions on the means of disclosures aiming at enhancing market discipline by centralising disclosures of prudential information in a single access point established by EBA. This will facilitate access to prudential data and comparability across industry. The CRR mandates the EBA, under Article 434, to publish in its website the Pillar 3 information required to be disclosed by credit institutions ('Pillar 3 Data Hub' or 'P3DH').

As regards SNCIs¹¹, the EBA is required to publish the Pillar 3 disclosures on their behalf and based on the information reported by these institutions to competent authorities in accordance with Article 430. This approach differs from the process applied to large and other institutions, which must submit the already processed Pillar 3 disclosure reports, which the EBA then publishes without further transformation. The list of SNCIs to be considered when computing these calculations is determined on the basis of the master data provided and updated by the Competent Authorities.

The comprehensive ITS on institutions' public disclosures encompasses templates to implement quantitative disclosure requirements and flexible tables for the qualitative disclosures, with detailed instructions on the type of information to be provided. Currently, only quantitative data is collected under the supervisory reporting. Questions on the possible collection of qualitative information were included in the consultation paper on the ITS on supervisory reporting.

The disclosure requirements, particularly for SNCIs, are aligned to the possible extent with the supervisory reporting framework. This means that most of the quantitative information disclosed

⁶ [Implementing regulation - EU - 2024/3172 - EN - EUR-Lex](#)

⁷ [EUR-Lex - 02013R0575-20260101 - EN - EUR-Lex](#)

⁸ [EUR-Lex - 02021R0763-20241227 - EN - EUR-Lex](#)

⁹ [EUR-Lex - 02013R0575-20240109 - EN - EUR-Lex \(europa.eu\)](#)

¹⁰ [Regulation \(EU\) 2024/1623 of the European Parliament and of the Council of 31 May 2024 amending Regulation \(EU\) No 575/2013 as regards requirements for credit risk, credit valuation adjustment risk, operational risk, market risk and the output floorText with EEA relevance](#)

¹¹ To recall, SNCIs at the highest level in the EEA are required to disclose Pillar 3 information on the basis of Article 13 of the CRR.

by institutions can be derived from supervisory reporting. Furthermore, the consultation on the ITS on supervisory reporting should bridge the data gaps that still exist between the EBA Pillar 3 and supervisory reporting frameworks for SNCIs. In this regard, a mapping between disclosure and reporting data was developed and published by the EBA¹². The EBA started to publish this tool on its own initiative when implementing CRR2. The tool has been very well received and praised by reporting institutions and the CRR3 introduced a related mandate to the EBA to keep a mapping tool updated and publicly available. In addition to the mapping tool, the EBA makes also available a disclosures' signposting tool¹³ designed to support institutions in determining the applicable requirements based on their size and complexity and other relevant characteristics. Neither the mapping tool nor the signposting tool replace the legal text. In case of uncertainty, the provisions set out in the legislation prevail.

The disclosure requirements applicable to SNCIs are set out in the CRR and in the corresponding comprehensive ITS on institutions' public disclosures. These requirements are not currently under review, except for the topics covered in the consultation paper on the ITS on supervisory reporting. The implementation of the P3DH introduces a new way of disclosing, easing the overall disclosure process, but does not alter the scope or volume of information that must be made publicly available.

As demonstrated on many occasions, proportionality is a key principle for European legislators, being embedded in the initial version of the CRR and further emphasised in the subsequent revisions. The EBA was mandated under the CRR2 to measure and gain insights into the costs that institutions incur when complying with the supervisory reporting requirements. Based on that assessment, the EBA made recommendations on how to reduce reporting costs, particularly for SNCIs. The findings from this analysis were included in the EBA study on the cost of compliance with supervisory reporting requirements, published in 2021. The conclusions and recommendations included in this report have been present in the EBA work on successive framework releases since the publication of the report. In the same vein, proportionality has been considered when defining the proposed process to SNCIs presented in this discussion paper and put forward to a short consultation process.

¹² [Mapping tool](#)

¹³ [Signposting tool](#)

4. Discussion

4.1. Introduction

1. As previously noted, the EBA is required to publish the Pillar 3 disclosures on behalf of SNCIS based on the information these institutions report to their competent authorities in accordance with Article 430. To effectively implement this process, four elements are considered essential:
 - Availability of supervisory reporting data, ensuring that all required information is accessible to be processed by the EBA;
 - A complete, accurate and up-to-date mapping tool between the supervisory reporting and disclosure frameworks, forming the foundation for developing the calculation methodology;
 - Clear definition of publication dates, allowing sufficient time for supervisory data to stabilise and be reliably used for the preparation of Pillar 3 disclosures.
 - A dedicated helpdesk, enabling direct communication between the EBA and institutions to address questions or issues identified during publication process.



Figure 3: Summary of key elements

2. The following sub-sections provide an in-depth examination of each of these four key elements.

4.2. Supervisory reporting

3. While certain quantitative data enabling a centralised computation by the EBA are already collected through the supervisory reporting framework, under the consultation paper on the ITS on supervisory reporting it was analysed whether these data are sufficient to produce all information required for disclosure under the respective ITS and, as such, whether the EBA would be in a position to fulfil its mandate. Any necessary amendments to the supervisory reporting framework aimed at enabling the EBA to fully replace institutions, in particular listed SNCIs, in their current disclosure obligations are addressed in the consultation paper on the ITS on supervisory reporting.
4. The table below presents an overview of all quantitative Pillar 3 requirements applicable to SNCIs, together with the corresponding analysis results and proposals set out in the consultation paper on the ITS on supervisory reporting.

Pillar 3 Template / Table	Institutions subject to requirement	Analysis' results	Proposal (Supervisory reporting ITS)
EU KM1: Key metrics template	All SNCIs	All datapoints available	-
EU OV1: Overview of total risk exposure amounts	Listed SNCIs only	A few datapoints missing	Two datapoints to be added in COREP (minimum necessary)
EU CR1: Performing and non-performing exposures and related provisions	Listed SNCIs only	One datapoint missing FINREP not available at individual level	Add Pillar 3 template to supervisory reporting ITS for solo institutions
EU CQ1: Credit quality of forborne exposures	Listed SNCIs only	FINREP not available at individual level	Add Pillar 3 template to supervisory reporting ITS for solo institutions
EU CQ3: Credit quality of performing and non-performing exposures by past due days	Listed SNCIs only	FINREP not available at individual level	Add Pillar 3 template to supervisory reporting ITS for solo institutions
EU CQ7: Collateral obtained by taking possession and execution processes	Listed SNCIs only	FINREP not available at individual level	Add Pillar 3 template to supervisory reporting ITS for solo institutions
EU CVA4: RWEA flow statements of credit valuation adjustment risk under the Standardised Approach	Listed SNCIs only	All datapoints available	-
EU REM1: Remuneration awarded for the financial year	Listed SNCIs only	Not all institutions under the scope of EBA Guidelines on remuneration	Add Pillar 3 template to supervisory reporting ITS for listed SNCIs
EU REM2: Special payments to staff whose professional activities have a material impact on institutions' risk profile (identified staff)	Listed SNCIs only	Not all institutions under the scope of EBA Guidelines on remuneration	Add Pillar 3 template to supervisory reporting ITS for listed SNCIs
EU REM3: Deferred remuneration	Listed SNCIs only	Not all institutions under the scope of EBA Guidelines on remuneration	Add Pillar 3 template to supervisory reporting ITS for listed SNCIs
EU REM4: Remuneration of 1 million EUR or more per year	Listed SNCIs only	Not all institutions under the scope of EBA Guidelines on remuneration	Add Pillar 3 template to supervisory reporting ITS for listed SNCIs

Figure 4: Overview of quantitative requirements applicable to SNCIs and analysis' results / proposals

5. To recall, most of the proposals outlined in the consultation paper would affect only a very limited number of institutions¹⁴, that is listed SNCIs, and would, at the same time, enable these entities to have all Pillar 3 information disclosed in a single location.
6. The additional datapoints that SNCIs would provide under the supervisory reporting framework is offset by the reduction in datapoints they would otherwise need to disclose via own channels. As a general note, the amendments proposed in the consultation paper are guided by the principle that any additional supervisory data requirements should be

¹⁴ Listed SNCIs currently account for approximately 4% (around 90 institutions) of the overall SNCI population. A small part of the listed SNCIs are solo entities (corresponding to 1% of the total number of SNCIs).

strictly limited to what is necessary, taking into account both the relevance of the information and the EBA's ability to perform a centralised computation. This approach is intended not only to ensure proportionality, but also to maximise efficiency gains for institutions, in particular by reducing duplication of effort and limiting the operational burden associated with the preparation and publication of Pillar 3 information across multiple disclosure channels.

7. In the case of qualitative information, it is currently not gathered within the supervisory reporting framework. In this context, different options were presented in the consultation paper as regards the process of publication for this information. Below, the list of qualitative requirements applicable solely to listed institutions is presented:

Pillar 3 Tables
EU OVC: ICAAP information
EU OVA: Institution risk management approach
EU LIQA: Liquidity risk management
EU CRA: General qualitative information about credit risk
EU MRA: Qualitative disclosure requirements related to market risk
EU ORA: Qualitative information on operational risk
EU REMA: Remuneration policy

Figure 5: List of qualitative requirements applicable to listed SNCIs

8. To note, SNCIs will be subject to additional requirements on disclosures. In particular, listed SNCIs will have additional disclosure requirements on exposures to shadow banking entities and on ESG related risks, while non-listed SNCIs will be subject to additional ESG related risks disclosure requirements only. These requirements were not included in the assessment above as the consultation on the supervisory reporting framework is still on-going and the EBA Final draft ITS on disclosures on ESG risks, equity exposures and the aggregate exposure to shadow banking entities specifying these requirements will be published in due course. However, it is important to note that all the new Pillar 3 quantitative requirements will be only applicable from 31 December 2027 first reference date and the proposed supervisory reporting data will cover them and be enough to run the centralised computation.
9. As regards the signing off by SNCIs of the information that the EBA will disclose based on supervisory reporting data, the submission of that information through the regular supervisory reporting channels, which is approved by the institution, constitutes the institution's formal sign-off of the data to be disclosed. This is possible because the EBA is ensuring that all mappings are based on simple and straightforward calculations, which means on the one hand that the institution should be able to know the figures that the EBA will disclose when submitting the reporting data, and on the other hand, that the margin for errors in EBA calculations are very minimum or inexistent. By the time of submission of the supervisory reporting data to the EBA, all internal controls, validations and verification processes are expected to have been completed. Consequently, full responsibility and ownership of the data remain with the reporting institutions. The EBA's role is limited to ensuring that the simple calculations performed on the basis of these submitted data run correctly and that the underlying calculation methodology is transparent and well

understood by the industry. A disclaimer reflecting this clarification on responsibilities will be included in the data hub.

10. Finally, it is important to discuss the possibility that institutions have to omit Pillar 3 information from their disclosures based on Article 432 of the CRR (non-material, proprietary or confidential information). The decision of omitting information can only be taken by the institution as the only one that can elaborate on the reasoning behind that. In this sense, in case there is information that shall not be published by the EBA in the data hub, the institutions would need to contact the EBA via the helpdesk (please see respective section in this discussion paper) and indicate clearly that no disclosure shall be done for their institutions and also the reasons behind this decision. These cases will be treated bilaterally and, depending on the respective magnitude, the EBA might develop specific solutions to deal with this aspect. In case the disclosures are to be omitted, the EBA shall be contacted by the institution up to one month before the scheduled date for publication. Communications after this date would be disregarded.

Questions

- a) Would you have any comments on the information presented in this sub-section as regards the analysis of the current supervisory reporting framework?
- b) Do you have any views on the process proposed, in terms of straightforward mappings, easy calculations and the signing off of the data by institutions when submitting their supervisory reporting data?
- c) Would you have the need to omit any Pillar 3 information from your disclosures based on Article 432 of the CRR? Which datapoints? Could you please explain the reasons behind this need?

4.3. Mapping tool and Calculation

11. For the reasons explained in the next sub-section of this discussion paper, the EBA proposes to follow a staggered approach as regards the scope of publication (reduced to one template for the first publication / launch of the P3DH to SNCIs – template EU KM1). In the case of non-listed SNCIs, which are the majority of SNCIs, this would cover all the scope of Pillar 3 templates currently included in the EBA Pillar 3 framework, as ESG disclosure templates will only start to apply from 31 December 2027 first reference date. In the case of listed SNCIs, while the main reasoning behind it relates to the availability of data, this approach would also allow more time to test the calculation methodology and the developed engine also with the volunteering institutions that will be part of the pilot exercise.
12. The current version of the mapping tool¹⁵, is the basis to develop the calculation methodology / formulas to produce the quantitative figures for template “EU KM1: Key

¹⁵ [Mapping tool](#)

metrics template”. These formulas were incorporated in the internal Data Point Model tool and will be run using an internally developed calculation engine. The calculation formulas proposed to be considered for EU KM1 are presented in Annex I of this discussion paper.

13. It is important to note that the formulas to be implemented for the remaining templates in future publications would also be published for short consultation. Following a feedback period, the final version of the calculation methodology would then be made available on the EBA website. This is to be done every time the need is identified (amendments to frameworks, correction of inaccuracies, etc.).

Questions

- d) Do you agree with the calculation methodology / formulas presented in Annex I for template EU KM1? Do you also agree with the proposals presented in column “Comments” in the table in Annex I? Do you have any specific comments on the use of fully phased-in figures? In case you do not agree, in your view, what could be the solution? In case of any findings, please provide detailed reasoning and concrete alternative proposal.
- e) Do you have any views on the staggered approach proposed?

4.4. Publication

4.4.1. Proposed publication dates under steady state

14. On the publication of Pillar 3 information for SNCIs it is crucial to determine when the publication shall occur. Having in scope around 2.300 institutions, an individual tracking of the most appropriate date to proceed with the publication is not possible. As such, a common date is proposed to be defined. Several factors were taken into account in the process of determining which date would be the most appropriate one. Amongst others, the most relevant aspects taken into consideration were:
 - Supervisory reporting deadlines: information shall be available to the EBA enough time in advance to proceed with the respective processing and computation of Pillar 3 figures;
 - Conclusion of audit procedures: enough time shall be given in order to have most of the audit procedures concluded, so the supervisory data is already stable enough to be used as a basis for publication;
 - Resubmission analysis: historical trends on resubmission were analysed by the EBA to assess by when the supervisory data seems stable enough for the vast majority of the institutions in scope.
15. Following the assessment of the different points listed in the previous paragraph, **end-September is deemed as an adequate timing to publish information for non-listed SNCIs.**

16. For listed institutions, end-September as common date for the publication of Pillar 3 disclosures would be too late. Under Article 4 of Directive 2004/109/EC of the European Parliament and of the Council on the harmonisation of transparency requirements in relation to information about issuers whose securities are admitted to trading on a regulated market (Transparency Directive)¹⁶, annual financial reports shall be made public at the latest four months after the end of each financial year (i.e., by end-April). At the same time, under Article 433 of the CRR, the EBA shall publish annual disclosures on its website on the same day as the institutions publish their financial statements or as soon as possible thereafter. For this reason, and combining these two legal provisions, the **proposed date for publication of Pillar 3 information to listed institutions could be end-April**. This date could be, however, challenging as the updated supervisory reporting data considering the latest adjustments arising from the audit procedures might not be available to the EBA on time to proceed with the calculations and publication. For this reason, a question is included in this Discussion Paper on whether end-June, or any other date, would be a most appropriate date for the publication even if not fully aligned with the timeline under the Transparency Directive for the publication of the financial statements.
17. As regards information on remuneration policies under Article 450 of the CRR, the publication for listed institutions would occur two months after, that is **end-June**, in line with the legal provision under Article 434(3) of the CRR.
18. While for non-listed SNCIs, templates applicable according to the EBA Pillar 3 ITS should be available in the P3DH from Q4 2026 (template KM1), the EBA expects that in 2028, for December 2027 reference date, the P3DH will cover the full set of Pillar 3 requirements applicable to SNCIs, both listed and non-listed, based on data calculated by the EBA (provided that by that date all necessary information is included in the supervisory reporting framework).

4.4.2. First and second publication (transition phase)

19. As previously mentioned, the first publication of information for SNCIs in the P3DH is planned to occur in Q4 2026 with reference December 2025. The EBA proposes to follow a staggered approach for the implementation of the P3DH to SNCIs. This proposal is mainly justified by the complexity of this new process and the data that is effectively available at this stage. Based on the timeline of the consultation paper on the ITS on supervisory reporting, this full Pillar 3 information for listed SNCIs will not be available before reference date December 2027 (i.e., for publication in 2028).
20. As such, the first publication / launch of the P3DH for SNCIs in Q4 2026 would cover all small and non-complex institutions (listed and non-listed) and would contemplate solely one template (EU KM1) on the following basis:

¹⁶ [Transparency Directive](#)

- It is applicable to all institutions in scope;
 - All datapoints to calculate the Pillar 3 figures are currently available under the supervisory reporting framework;
 - High relevance of the information contained in this template.
 - It is the only template applicable to non-listed SNCIs as of end December 2025 reference date.
21. The scope of the P3DH for reference date December 2025 means that listed institutions would need to comply with the respective Pillar 3 requirements as done so far, i.e., publishing on their own website or similar means as specified under CRR2. For non-listed SNCIs, the scope of the P3DH covers already all their Pillar 3 disclosure obligations as of December 2025 (first reference date).
22. For the following year (second publication), i.e. publication in 2027 with reference to December 2026, two options are presented for discussion as regards listed institutions:
- Option A: Continue publishing EU KM1 only but considering the steady state date (that for listed SNCIs could be end-April);
 - Option B: Publish, for listed SNCIs, all templates to which the supervisory reporting information is fully available, in addition to KM1. In detail this would mean:
 - EU CR1, EU CQ1, EU CQ3, EU CQ7: for listed SNCIs at consolidated level only (that is, excluding listed 'solo' SNCIs);
 - EU KM1 and EU CVA4: for all listed SNCIs;
23. Under both options, and similarly to the first year of implementation, listed institutions would need to comply with the respective Pillar 3 requirements as done so far, i.e., publishing on their own website or similar means as specified under CRR2. This is due to the fact that the corresponding supervisory reporting data would not be available to the EBA by then, even if finally included in the supervisory reporting framework as suggested in the consultation paper.
24. During this transition phase, institutions shall proceed with the publication of the Pillar 3 information following their own schedule. Specially as regards the first publication (in 2026, with reference date December 2025), and in particular for listed SNCIs given the requirement to publish by the end of April, this might imply that the EBA would be publishing the template EU KM1 after the individual publication by the institutions. When proceeding with the first publication, an EBA disclaimer will be considered and institutions with publications already done would be invited to include in their own publications a link to the official data published by the EBA. Discrepancies between individual publications and

centralised publication by the EBA are not expected but, in case this occurs, institutions would be invited to explain in their own website or similar means of publication the reasons that gave origin to different figures being published (restatement, corrections with retroactive application, etc.).

4.4.3. Summary of proposed publication dates

25. Below, an overview of the proposed dates for publication considering the different options and scope of publication is provided:

	First publication (reference Dec 2025)	Second publication (reference Dec 2026)		Steady state (reference Dec 2027)
		Option A	Option B	
Non-listed SNCIs	Q4 2026 All P3 requirements	End-September All P3 requirements	End-September All P3 requirements	End-September All P3 requirements
Listed SNCIs	Q4 2026 EU KM1	End-April EU KM1	End-April EU KM1, EU CVA4 for all listed SNCIs EU CR1, EU CQ1, EU CQ3, EU CQ7 for listed SNCIs at consolidated level	End-April All P3 requirements except REM information End-June REM information

Figure 6: Summary of proposals: scope and dates of publication

Questions

- f) Would you agree with the proposed dates for publication of Pillar 3 information under the general process to be followed in the steady state? As regards the publication date for listed SNCIs in the steady state, would you have a preference for end-April, end-June or any other date?
- g) Would you agree with the proposed reduced scope for publication in 2026 with reference to December 2025? Do you agree to still publish in Q4 the information for listed SNCIs, even if this might represent a second publication with the same reference date for the same institutions? Would you expect this situation to occur also to non-listed SNCIs?
- h) As regards the second publication (to occur in 2027 with reference to December 2026) would you prefer Option A or Option B? Please explain your reasoning.

4.4.4. Publication dates for institutions with financial year-end different from December

26. Out of the current total number of SNCIs, 0,33%¹⁷ of these institutions have a financial year-end different from December. These different financial year-ends correspond to: 31 January, 31 March, 30 June or 30 September. All these institutions are non-listed SNCIs.

¹⁷ Less than 10 institutions.

27. The publication dates for these institutions would be scheduled as follows:

- First publication: Q4 2026 (same as for all the other institutions, unless the supervisory reporting data is not available yet and, in that case, the publication would be done when the submission of the supervisory reporting data occurs);
- Second and following publications: 9 months after the financial year-end, in line with the remaining institutions. In practice this means:
 - Financial year-end 31 January: publication by end-October;
 - Financial year-end 31 March: publication by end-December;
 - Financial year-end 30 June: publication by end-March of the following year;
 - Financial year-end 30 September: publication by end-June of the following year.

Questions

- i) Would you agree with the proposed publication schedule for institutions with a financial year-end different from December? Please explain your reasoning.

4.4.5. Resubmission of supervisory reporting data

28. Supervisory reporting data can be resubmitted to competent authorities as currently done and following the EBA Guidelines on resubmission¹⁸. The published Pillar 3 information would be updated automatically and on an on-going basis, without undue delay, following the respective resubmission.

29. Dates of recalculation will be made available on the EBA website as each submission will give origin to a new XBRL.csv file to be published on the P3DH data hub as currently done for the XBRL.csv files submitted to the EBA by large and other institutions. As regards the possible resubmission of qualitative information (only listed SNCIS) under the supervisory reporting framework, the solution will be designed on the basis of the option followed for implementation (please see options presented in the consultation paper on the ITS on supervisory reporting published on 10 April 2026 - paragraphs 29 and 30 of "[Module 8 – Alignment of P3 for SNCIS](#)").

Questions

- j) Would you agree with the proposal presented for the recalculation and republication of Pillar 3 data based on resubmissions of supervisory reporting data? Any other suggestion that shall be considered by the EBA?

¹⁸ [Guidelines on resubmission of historical data | European Banking Authority](#)

4.5. Helpdesk

30. The current helpdesk created for large and other institutions (p3dh@eba.europa.eu) will remain available for SNCIs. This will ensure the existence of a direct channel for contacts between these institutions and the EBA. It shall be used by SNCIs to submit questions, comments or requests for correction (in case an inaccuracy is detected on the published information).

Annex II - Summary of questions

- a) Would you have any comments on the information presented in this sub-section as regards the analysis of the current supervisory reporting framework?
- b) Do you have any views on the process proposed, in terms of straightforward mappings, easy calculations and the signing off of the data by institutions when submitting their supervisory reporting data?
- c) Would you have the need to omit any Pillar 3 information from your disclosures based on Article 432 of the CRR? Which datapoints? Could you please explain the reasons behind this need?
- d) Do you agree with the calculation methodology / formulas presented in Annex I for template EU KM1? Do you also agree with the proposals presented in column “Comments” in the table in Annex I? Do you have any specific comments on the use of fully phased-in figures? In case you do not agree, in your view, what could be the solution? In case of any findings, please provide detailed reasoning and concrete alternative proposal.
- e) Do you have any views on the staggered approach proposed?
- f) Would you agree with the proposed dates for publication of Pillar 3 information under the general process to be followed in the steady state? As regards the publication date for listed SNCIs in the steady state, would you have a preference for end-April, end-June or any other date?
- g) Would you agree with the proposed reduced scope for publication in 2026 with reference to December 2025? Do you agree to still publish in Q4 the information for listed SNCIs, even if this might represent a second publication with the same reference date for the same institutions? Would you expect this situation to occur also to non-listed SNCIs?
- h) As regards the second publication (to occur in 2027 with reference to December 2026) would you prefer Option A or Option B? Please explain your reasoning.
- i) Would you agree with the proposed publication schedule for institutions with a financial year-end different from December? Please explain your reasoning.
- j) Would you agree with the proposal presented for the recalculation and republication of Pillar 3 data based on resubmissions of supervisory reporting data? Any other suggestion that shall be considered by the EBA?