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Discussion Paper

On certain Taxonomy key performance indicators and other aspects of the Disclosures Delegated Act under Article 8 of the Taxonomy Regulation

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Responding to this Discussion Paper

The EBA invites comments on all proposals put forward in this paper and in particular on the specific questions stated in the boxes below (and in the Annex of this paper).

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 12.08.2026. 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 development of the draft technical advice. They are aimed at eliciting discussion and gathering the stakeholders’ opinion at an early stage of the process.

Executive Summary

On 4 March 2026, the European Commission called the European Supervisory Authorities (ESAs) to develop targeted technical advice to support the review of the Disclosures Delegated Act under Article 8 Taxonomy Regulation. The EBA aims to respond to request with a view to improve the usability, relevance and proportionality of the Taxonomy disclosures framework.

This Discussion Paper developed for this purpose provides an initial assessment and proposals on the issues put forward in the European Commission's request and invites stakeholders to share their feedback on the presented analysis. It addresses issues specific to the EBA's remit as well as the horizontal issues relevant to all ESAs, on which the EBA will provide advice in coordination with the other ESAs. The issues devoted to the EBA include the following:

- **Limiting the Fees and Commissions KPI to capital markets-related activities**

The Discussion Paper assesses various services included within the scope of the Fees and Commissions KPI and proposes a refined scope focused on capital market activities. While the EBA sees limited relevance of this KPI in the context of sustainability disclosures, stakeholder feedback is sought on two main options:

- 1) deleting the Fees and Commissions KPI or replacing it with qualitative disclosures;
- 2) limiting the scope of the Fees and Commissions KPI to fees and commissions related to (i) issuance or other services related to third party securities; (ii) mergers and acquisition undertakings advisory services; (iii) undertakings finance services related to capital market advisory for undertakings, clients or other; and (iv) distribution of products issued by entities outside the prudential group to its current customers.

- **Connecting the Trading Book KPI to market liquidity**

The Discussion Paper presents an assessment of the Trading Book KPI and proposes refocusing it on the provision of market liquidity through market making. While the EBA sees limited relevance of this KPI and acknowledges operational challenges in its application, it seeks stakeholder feedback on two main options:

- 1) deleting the Trading Book KPI or replacing it with qualitative disclosures;
- 2) narrowing down the scope of the KPI to providing market liquidity through market making, potentially focusing on the market making for corporate issuances.

- **Narrowing the 'other services' KPI of investment firms**

The Discussion Paper proposes that the list of services included in the KPI of investment firms be narrowed down to those considered most relevant, including (i) portfolio management; (ii) investment advice; (iii) underwriting of financial instruments and/or placing of financial instruments on a firm commitment basis; (iv) placing of financial

instruments without a firm commitment basis. It also initiates a discussion on shifting the KPI focus from a revenue-based metric to asset value-based measure.

- **Aligning the grandfathering rules with the approach under the EU Green Bond Standard**

Based on the assessment of the relevant regulatory provisions, the initial proposal presented in the Discussion Paper is to align the grandfathering rules in the Taxonomy disclosure requirements with those set out in the EU Green Bond Standard. This proposal covers the scope of assets, the grandfathering period, and the related transparency requirements established under the EU Green Bond Standard.

In addition, the Discussion Paper provides an analysis of horizontal issues relevant to the broader financial sector, which was carried out in cooperation with other ESAs, including:

- **Development of simple but meaningful rules for disclosing Taxonomy KPIs at group level and for subsidiary disclosures**

The assessment concludes that current rules as set out in the existing regulation, which are based on the prudential scope of consolidation for credit institutions, are fit for purpose, but require further clarification to ensure efficient, accurate and transparent application. The ESAs' preliminary advice is that a weighted KPI aggregating information on various financial and non-financial activities should not be introduced, as its relevance and usability would be limited.

- **Considering OpEx for the computation of the KPIs of financial institutions**

The Discussion Paper examines the potential voluntary use by non-financial undertakings of OpEx information disclosed by non-financial undertakings. Preliminary analysis suggests that its usefulness is limited and dependent on any future revision of the KPI. Even if used on a voluntary basis, incorporating OpEx in the KPIs of financial institutions could increase complexity and administrative burden, while providing only marginal additional value and potentially reducing comparability of disclosed KPIs.

In addition to these issues, the European Commission invited the EBA to investigate and propose other targeted improvements considered beneficial. To that end, the EBA proposes simplifying the disclosure templates by potentially merging or aligning the templates used for disclosing on credit institutions' off-balance sheet asset under management with those used by asset managers. While at this stage the EBA does not see sufficient justification for specifying different templates for these two situations, stakeholders views are sought on potential reasons why this differentiation may be relevant.

Next steps

Stakeholders are invited to provide their feedback on the assessment and proposals presented in this Discussion Paper. The feedback received by stakeholders will be used by the EBA in finalising its Opinion and accompanying Report on the topic. Responses should be sent through a form available on the EBA website before 12 August 2026.

1. Introduction

1.1. Background

1. In March 2026, the European Commission requested¹ the European Supervisory Authorities (ESAs) to develop technical advice on certain taxonomy key performance indicators (KPIs) of the Disclosures Delegated Act² under Taxonomy Regulation³. ESAs technical advice is expected to inform the European Commission's review of that Delegated Act.
2. The envisaged technical review of the Disclosures Delegated Act by the European Commission complements the amendments introduced to that Delegated Act as part of the Omnibus simplification package⁴. The latter introduced several amendments to disclosure requirements, including amongst others, simplified disclosure templates for credit institutions and investment firms and postponed the disclosure of Fees and Commissions and Trading Book KPIs for credit institutions.
3. The Omnibus simplification package refocused the scope of Taxonomy disclosure requirements to financial and non-financial undertakings that have more than 1000 employees with a net turnover of at least EUR 450 million.⁵
4. In the scope of its request, the European Commission invited the EBA to investigate and provide technical input on the following issues:
 - a. **limiting the Fees and Commissions KPI to capital markets-related activities:** the EBA could explore ways to narrow down the scope of the Commission and Fees KPI to activities related to capital markets, such as those related to securities issuance, M&A and corporate finance and services supporting the issuance and trading of green

¹ Reference to the CfA (Ref. Ares(2026)2366154) on the EBA website ([link](#)).

² Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by specifying the content and presentation of information to be disclosed by undertakings subject to Articles 19a or 29a of Directive 2013/34/EU concerning environmentally sustainable economic activities, and specifying the methodology to comply with that disclosure obligation, OJ L 443, 10.12.2021, p. 9.

³ Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088, OJ L 198, 22.6.2020, pp. 13–43

⁴ Commission Delegated Regulation (EU) 2026/73 of 4 July 2025 amending Delegated Regulation (EU) 2021/2178 as regards the simplification of the content and presentation of information to be disclosed concerning environmentally sustainable activities and Delegated Regulations (EU) 2021/2139 and (EU) 2023/2486 as regards simplification of certain technical screening criteria for determining whether economic activities cause no significant harm to environmental objectives, OJ L, 2026/73, 8.1.2026

⁵ The amendment allows large undertakings with an average of more than 1000 employees and a net turnover not exceeding EUR 450 million during the financial year to disclose information under Article 8 of Taxonomy Regulation in a more flexible way.

- (Taxonomy-aligned) securities (reception, transmission and execution of orders, clearing and settlement, custody);
- b. **connecting the Trading Book KPI to market liquidity:** the EBA could explore ways to narrow down the scope of the Trading Book KPI to providing market liquidity through market making, with a clear focus on providing liquid markets for green (Taxonomy-aligned) securities;
 - c. **narrowing the ‘other services’ KPI of investment firms:** the scope of the ‘other services KPI’ of investment firms could be narrowed down in line with the Commission and Fees KPI of credit institutions;
 - d. **five-year grandfathering period for financial exposures in terms of compliance with Taxonomy criteria (in case criteria are revised and the investee company does not comply with new rules):** EBA could in cooperation with ESMA and EIOPA explore ways to align rules with the approach under the EU Green Bond Standard⁶.
5. In addition to the specific points addressed to the EBA, the European Commission invited ESAs to provide technical input on the following horizontal issues:
- a. **OpEx for the computation of the KPIs of financial institutions:** explore ways to allow financial institutions to use on a voluntary basis the OpEx KPI reported by counterparties for computing in their KPIs their exposures to non-financial undertakings;
 - b. **group level taxonomy reporting:** explore the development of simple but meaningful rules for reporting Taxonomy KPIs at group level for groups providing both non-financial and financial services (group treatment), or different financial activities and services (insurance, lending, investment) and for subsidiary reporting. This should ensure that there is a common approach for group treatment involving non-financial and financial undertakings.
6. The EBA, together with other ESAs, are also invited to explore and propose other targeted simplifications and improvements to any general Taxonomy reporting rules.

1.2. Approach

7. The objective of Taxonomy disclosures is to create a standardised and transparent framework showing how much of market activities are environmentally sustainable in accordance with Taxonomy Regulation.
8. By providing transparent and standardised information to investors about the environmental performance of assets and economic activities of financial and non-financial undertakings, the

⁶ Regulation (EU) 2023/2631 of the European Parliament and of the Council of 22 November 2023 on European Green Bonds and optional disclosures for bonds marketed as environmentally sustainable and for sustainability-linked bonds, OJ L, 2023/2631

regulatory framework aims to support market growth for environmentally sustainable activities, improve funding conditions for these activities, and help mitigate greenwashing.

9. The EBA's assessment of the technical issues presented in this discussion paper is based on the principles highlighted by the European Commission in its request.⁷ In addition to these principles, the EBA's assessment of the technical issues takes into account the following:
 - a. relevance and adequacy of the information for the objective of Taxonomy disclosures for the users of taxonomy-related sustainability information such as investors, analysts, NGOs and other stakeholders;
 - b. materiality of information in the context of Taxonomy disclosures and wider sustainability reporting both for the users of information and for the preparers of this information from a cost-benefit analysis point of view; and
 - c. simplification and burden reduction objectives related to sustainable finance regulation and policy initiated in the context of the Omnibus package.

1.3. Process

10. While the ESAs will submit their advice to the European Commission separately, a close cooperation and coordination have been put in place to ensure consistency of the individual responses, especially in relation to horizontal issues. To facilitate readers' reconciliation of the proposals on horizontal issues across the respective consultation documents of the ESAs, the text highlighted in light green identifies the text that was developed in common with the other ESAs. This text is generally aligned across the consultation documents of the ESAs, although editorial differences may exist to best fit with the writing style and structure of the respective documents.
11. Where applicable and possible, the EBA used supervisory data to conduct evidence-based analysis to support qualitative arguments with quantitative information. In the absence of ad-hoc data collection and call for evidence specific to this exercise, supervisory data provide an adequate source of information to estimate, to the extent possible, the magnitude and materiality of the KPIs for credit institutions and investment firms.
12. Furthermore, in the development of this discussion paper, the EBA, together with the other ESAs, engaged with various stakeholders and held workshops with credit institutions and other practitioners in order to receive preliminary feedback to the issues in question.⁸ The EBA used the relevant stakeholder feedback in the development of this discussion paper.

⁷ This refers to Part 3 (Principles) of the Call for Technical Advice (Ref. Ares(2026)2366154). It covers the principles related to autonomy, reliable samples of qualitative and quantitative data, justified solutions, cooperation between the ESAs, cooperation with other EU bodies, absence of conflict of interest, gathering the views of relevant market participants, and no legal text form of the ESAs' technical advice.

⁸ The EBA held discussion with various stakeholders including, and not limited to, Association and Financial Market in Europe (AFME) and its member institutions, European Banking Federation (EBF) and its member

13. Stakeholders are invited to submit their responses to the consultation questions presented in this discussion paper before 12 August 2026. After the end of the consultation period, the EBA is going to assess the stakeholder feedback and finalise an Opinion on the technical issues. The EBA is requested to respond to the European Commission’s call for technical advice in October 2026.

1.4. Content

14. The structure and content of this discussion paper is organised by the issue to be addressed in accordance with the European Commission’s call for technical advice. Each issue is addressed in a separate section, containing the analysis and preliminary advice. In each case, the analysis refers to current requirements related to the issue in question, presents the assessment of technical aspects requested in relation to the issue, and considerations on the materiality and relevance of the issue, where applicable and possible.

Questions for public consultation

Q1. Please identify your organisation (if applicable) and indicate the capacity in which you are responding to this consultation:

- a. user of sustainability information;
- b. preparer of sustainability information;
- c. both user and preparer of sustainability information;
- d. other (please specify).

2. Issue 1: Fees and Commissions KPI

2.1. Analysis

2.1.1. Current requirements

15. Commission Delegated Regulation (EU) 2021/2178 requires credit institutions to disclose information on services other than lending and asset management associated with economic activities that qualify as environmentally sustainable in accordance with Taxonomy Regulation. Accordingly, credit institutions are required to disclose Fees and Commissions KPI based on the content of the financial information provided by credit institutions to supervisors in accordance with Implementing Regulation (EU) 2024/3117 (FINREP).⁹

institutions, European Commission Joint Research Centre, EU Platform on Sustainable Finance, EFRAG Technical Expert Group and European Contact Group.

⁹ Commission Implementing Regulation (EU) 2024/3117 of 29 November 2024 laying down implementing technical standards for the application of Regulation (EU) No 575/2013 of the European Parliament and of

16. The table below presents the list of selected services included in the Fees and Commissions KPI of credit institutions under Taxonomy disclosures together with the direct mapping of these services to the content of the relevant datapoints in the above-mentioned supervisory reporting.¹⁰

Table 1 Fees and Commissions KPI: content and mapping between Taxonomy disclosures and supervisory reporting

Services indicated under Taxonomy disclosures	Corresponding datapoints in supervisory reporting, FINREP template 22.1		Corresponding instructions in supervisory reporting
(a) issuance or other services related to third party securities	0030	Issuances	'Issuances' shall include fees and commissions received for the involvement in the origination or issuance of securities not originated or issued by the institution.
	0050	Other fee and commission income in relation to securities	'Other fee and commission income in relation to securities' shall include fees and commissions generated by the institution providing other services related with securities not originated or issued by the institution.
(b) reception, transmission and execution on behalf of customers of orders to buy or sell securities	0040	Transfer orders	'Transfer orders' shall include fees and commissions generated by the reception, transmission and execution on behalf of customers of orders to buy or sell securities.
(c) merger and acquisition undertakings advisory services	0052	M&A advisory	'M&A advisory' shall include fees and commissions for advisory services surrounding corporate clients' mergers and acquisitions activities.
(d) undertakings finance services related to capital market advisory for undertakings, clients or other	0053	Treasury services	'Treasury services' shall include fees and commissions for corporate finance services related to capital market advisory for corporate clients.
	0054	Other fee and commission income in relation to corporate finance activities	'Other fee and commission income in relation to securities' shall include fees and commissions generated by the institution providing other services related with securities not originated or issued by the institution.
(e) private banking related fees	0055	Fee based advice	'Fee based advice' includes fees and commissions charged for advisory services to clients such as private banking related fees that are not directly linked to asset management. M&A advisory fees shall not be included here, but under 'Corporate Finance. M&A advisory'.
(f) clearing and settlement services	0060	Clearing and settlement	'Clearing and settlement' shall include fee and commission income (expenses) generated by (charged to) the institution where participating in counterparty, clearing and settlement facilities.
(g) custody and other related services	0080	Custody [by type of customer]	'Custody' shall include fee and commission income (expenses) generated by (charged to) the institution where providing these services.

the Council with regard to supervisory reporting of institutions and repealing Commission Implementing Regulation (EU) 2021/451

¹⁰ The EBA is currently consulting on revisions to the ITS on supervisory reporting (Commission Implementing Regulation (EU) 2024/3117) - Module on FINREP. This may have an impact on the datapoints linked to the Fees and Commissions KPI under taxonomy disclosures.

(h) payment services	0131	Payment services	'Payment services' shall include fee and commission income (expenses) generated by (charged to) the institution where it provides (receives) payment services as referred to in Annex I of the Directive (EU) 2015/2366. Information on the fee and commission income shall be reported separately for current accounts, credit cards, debit cards and other card payments, transfers and other payment orders as well as other fee and commission income in relation to payment services'. 'Other fee and commissions income in relation to payment services shall include, among others, charges for the use of the institution's ATM network by cards not issued by the institution. Information on fee and commission expenses on credit, debit and other cards shall be reported separately as well.
(i) fee and commission income for distribution of products issued by entities outside the prudential group to its current customers	0140	Customer resources distributed but not managed [by type of product]	'Customer resources distributed but not managed [by type of product]' shall comprise fee and commission income for distribution of products issued by entities outside the prudential group to its current customers. This information shall be reported by type of product.
(j) loan servicing activities	0190	Loan servicing activities	Fees from 'Loan servicing activities' shall include, on the income side, the fee and commission income generated by the institution providing loan servicing services and on the expense side, the fee and commission expense charged to the institution by loan service providers.
(k) foreign exchange services and international transactions	0213	Foreign exchange	'Foreign exchange' includes fee and commission income (expenses) for foreign exchange services (including exchange of foreign banknotes or coins, fees on international currency cheques, bid-ask-spread) and fee income from / expenses on international transactions; where the income (expenses) attributable to foreign exchange transactions can be separated from the other credit/debit card related fee income, this item shall also include foreign-exchange related fees and commissions generated via credit or debit cards.

17. The numerator of the KPI includes the fees and commissions income from services provided for counterparties' Taxonomy-aligned economic activities. When use of proceeds is known, this is estimated by weighting the fees and commissions income associated with each service with the proportion of turnover and CapEx associated with counterparty's Taxonomy-aligned economic activity linked to that service as disclosed in accordance with Taxonomy disclosure requirements. When the use of proceeds is unknown the weight to be applied to the fees and commissions income is the overall Taxonomy alignment KPI of the counterparty's activities. The denominator is the total fees and commissions income from services provided to undertakings other than lending and asset management.
18. Credit institutions have not yet started disclosing this KPI. Article 10 of Commission Delegated Regulation (EU) 2021/2178 requires the disclosure of the Fees and Commissions KPI by credit institutions from 1 January 2026 and subsequently Commission Regulation 2026/73 amending Delegated Regulation (EU) 2021/2178 further postpones the disclosure date of this KPI to 1 January 2028. As a result, credit institutions are required to disclose Fees and Commissions KPI from that date.

2.1.2. Elements of the KPI related to capital markets

19. In its targeted Call for Advice the European Commission requested the EBA to explore ways to narrow down the scope of the Fees and Commissions KPI to activities related to capital markets such as those related to securities issuance, M&A and corporate finance and services supporting the issuance and trading of green, Taxonomy-aligned securities (reception, transmission and execution of orders, clearing and settlement, custody). This requires the identification of services related to capital markets and where the activity may have a clear connection to environmentally sustainable finance in which credit institutions can act as enablers facilitating capital flows towards sustainable investment.
20. Such assessment is presented in Table 2 and suggests that four of the 11 elements in the Fees and Commissions KPI may potentially be relevant for capital markets in the context of sustainable finance. This includes:
- a. issuance or other services related to third party securities (a);
 - b. mergers and acquisition undertakings advisory services (c);
 - c. undertakings finance services related to capital market advisory for undertakings, clients or other (d); and
 - d. distribution of products issued by entities outside the prudential group to its current customers (i).
21. Other elements in the KPI are mostly transactional with no direct impact on the underlying financial asset associated with the economic activity. In those cases, the service provided by the credit institution does not have a direct effect on the nature of the investment, including its sustainability characteristics.

Table 2 Assessment of credit institutions' services in terms of their relevance to capital markets

Element of the KPI	Assessment
(a) issuance or other services related to third party securities	This relates to credit institution's services to support their clients with various financial securities such as bond issuances, equity issuances and structuring. These services, which appear on the income statement, are linked to capital markets. Through this service credit institutions may support the channelling of capital and directing investment into Taxonomy-aligned economic activities.
(b) reception, transmission and execution on behalf of customers of orders to buy or sell securities	The service relates to credit institutions' investment services on behalf of their clients. While the ultimate decision of investment in a financial product may have sustainability impact, the preference on the investment is driven by the client while the credit institution has an administrative role.
(c) mergers and acquisition undertakings advisory services	Credit institutions advise their clients to consolidate companies or assets through various financial transactions. Through these advisory services credit institutions may support growth and reshape undertakings' portfolios towards Taxonomy-aligned economic activities and integrate sustainable finance instruments, e.g. advice on green bond issuance, into these deals. As a result, credit institutions' advisory services may in some cases influence capital flows towards sustainability.
(d) undertakings finance services related to capital market advisory for undertakings, clients or other	This service is directly related to capital markets and through advisory services to corporate clients, credit institutions may indirectly support investment in taxonomy aligned activities.
(e) private banking related fees	M&A advisory, corporate advisory as well as asset management activities are excluded from this service. For this reason, the scope of this service in terms of its relevance to capital market activities for sustainable investment purposes may be limited.

(f) clearing and settlement services	As part of the financial market infrastructure functions, this service aims to ensure an accurate, secure and efficient completion of a transaction in post-execution phase. It involves different elements such as validation, matching buy and seller obligations, managing counterparty risk as well as the delivery of the security or the funds. This service has no impact on the underlying financial asset.
(g) custody and other related services	'Custody assets' refer to the services of safekeeping and administration of financial instruments for the account of clients provided by the institution and services related to custodianship such as cash and collateral management. Custody services typically include the settlement, safekeeping, and reporting of clients' marketable securities and cash. This service overall relates to transaction services provided to clients and has no impact on the underlying financial asset. There is no direct link between this service and potential reallocation of capital to sustainable activities.
(h) payment services	'Payment services' refer to the collection on behalf of customers of payments generated by debt instruments that are neither recognised on the balance sheet of the institution nor originated by it. Payment services aim to enable execution of payment transactions, transfer of funds, settling of obligations, and secure and efficient management of payment flows. This service is purely transactional and there is no direct link between credit institutions' payment services and potential reallocation of capital to sustainable activities.
(i) fee and commission income for distribution of products issued by entities outside the prudential group to its current customers	This activity can be related to capital markets when the financial products issued outside the prudential group and distributed by the credit institution are securities, funds and similar financial products. This is an activity where the credit institution has a role to facilitate capital allocation. While credit institution has no influence over the nature of the financial product issued, it has a choice on which instruments to include in this offer.
(j) loan servicing activities	Loan servicing is the administrative management of the loan from the point of disbursement until its full reimbursement. It covers sending monthly payment statements, collecting monthly payments, maintaining records of payments and balances, collecting and paying taxes and insurance emitting funds to the note holder, and following up on any delinquencies. While the loan itself can be assessed against taxonomy criteria, the servicing is a sustainability-neutral function.
(k) foreign exchange services and international transactions	The services help clients to conduct their cross-border activities and manage currency-related risks effectively. The service has no direct impact on the underlying financial asset or transaction in terms of its taxonomy alignment.

2.1.3. Materiality of the KPI

22. As defined in the Commission Delegated Regulation (EU) 2021/2178, Green asset ratio (GAR) shows the extent to which the financing activities in credit institutions' banking book, including loans and advances, debt securities and equity instruments, are associated with economic activities aligned with Taxonomy Regulation. This KPI targets the banking book of the credit institutions and as a result reflects a comprehensive picture of credit institutions' Taxonomy-eligible and aligned activities. The EBA understands that users of information consider the GAR to be the main KPI for credit institutions' activities related to Taxonomy Regulation.
23. The following analysis aims to show the scale and materiality of the Fees and Commissions KPI in relation to total operating income. Such analysis would also inform proportionality considerations, and the assessment of a proportionate design and application of regulatory requirements. The analysis is based on a sample of 125 institutions that reported FINREP supervisory data to the EBA at the highest level of consolidation in the EU as of September 2025

and are subject to the CSRD requirements. This sample represents 64% of total assets¹¹ in the EU.¹²

24. Supervisory data indicate that the total income generated from fees and commissions in the banking sector is approximately EUR 157¹³billion constituting 37%¹⁴ of the total operating income.¹⁵ Figure 1 (Annex II) shows the composition of the fees and commission income. Approximately EUR 94 billion, representing 60%¹⁶ of total fees and commissions income, are generated from services covered in the Fees and Commissions KPI as identified in the previously presented mapping (Table 1). This is 22% of the total operating income.¹⁷ ¹⁸ These relative figures on CSRD eligible sample of institutions are matching and representative when the same analysis is conducted on the full FINREP sample.¹⁹
25. Omnibus simplification package sets a materiality threshold for the Fees and Commissions KPI, which allows the omission of related information when the cumulative value of that income is below 10% of the value of all fees and commissions income related to specific economic activities that are included in the denominator of the KPI. Institution-level analysis shows that that fees and commissions income from all the services covered by the KPI, as currently designed in the disclosure requirements, exceeds 10% of total operating income for around 80% of credit institutions (Figure 2 in Annex II).²⁰

¹¹ Total assets are proxied by the leverage ratio exposures of the credit institutions.

¹² The overall sample of institutions in FINREP is 329 covering 84% of total assets in the EU/EEA. The statistics for CSRD eligible institutions in the overall FINREP sample will be compared to the statistics of the overall FINREP sample throughout the analysis to provide a comparative perspective. Such comparative perspective would provide an additional robustness check to the analysis.

¹³ 218 considering the overall FINREP sample (329 credit institutions covering 84% the total leverage ratio exposure).

¹⁴ This figure is 39.4% for the overall FINREP sample.

¹⁵ This global figure covers all services in the fees and commission information in supervisory reporting and does not filter out the services included in the fees and commission KPI designed in the taxonomy disclosures. Total operating income is the P&L figure reported by institutions including both income and expenses.

¹⁶ 128 EUR billion considering the overall FINREP sample (this represents 59% of the total fees and commissions income).

¹⁷ The remaining is based on income generated from other services and activities such as asset management, structured finance, loan commitments and financial guarantees given, loans granted, commodities.

¹⁸ This amount is 0.8% of the gross carrying amount of assets covered in GAR, the main KPI for credit institutions under Taxonomy disclosure requirements.

¹⁹ This is 23% of the total operating income considering the overall FINREP sample.

²⁰ This figure is highly affected by the fees and commission generated from 'Payment Services' which is the largest element in the KPI. When 'Payment services' is excluded from the analysis the share of institutions reaching the 10% materiality threshold goes down to 39%.

26. When the KPI is limited to capital markets-related activities, as outlined in section 2.1, its aggregate share of total operating income falls to 5.9%.²¹ At the institution level, income from these activities exceeds 10% of total operating income for approximately 16% of credit institutions (Figure 3 in Annex II). This includes fees and commissions from (i) issuance or other services related to third party securities, (ii) mergers and acquisition undertakings advisory services, (iii) undertakings finance services related to capital market advisory for undertakings, clients or other, and (iv) distribution of products issued by entities outside the prudential group to its current customers which together account for approximately EUR 40 billion.

2.1.4. Relevance of the KPI

27. In addition to the materiality considerations as assessed above, the relevance of the Fees and Commissions KPI, even if narrowed down to capital markets-related activities, may show some limitations as a complementary indicator for credit institutions' commitments to Taxonomy-aligned sustainable activities.
28. The Fees and Commission KPI is based on information coming from the income statement measuring income and expenses accrued during the disclosure period which represent flows. Accordingly, the Fees and Commission KPI differs from the GAR, which is a stock-based metric reflecting outstanding balance sheet positions at a given reporting date.
29. Furthermore, the interpretation and use of the Fees and Commissions KPI may be challenging, considering various dynamics that would drive the levels of fees and commissions for related activities each year. The fees and commissions income generated from the (four) services considered are typically not integral part to a financial instrument and arise from providing these services. As a result, their amount depends on transaction price. This is different than the gross carrying amount of assets qualified on the banking book and covered in the GAR which are measured at amortised cost²².
30. As a result, overall, it is possible to argue that the values of fees and commissions and in turn that of the KPI would be more volatile than that of the GAR. Indeed, credit institutions' fees and commissions are more sensitive to fluctuations in business activity, resulting in higher volatility. The KPI capturing various (short-term) dynamics affecting the level of fees and commissions income received from services will not be able to isolate and reflect accurately Taxonomy alignment value of the service or the credit institution's long-term sustainability strategy.
31. Another limitation to the comparability of the Fees and Commissions KPI, even if narrowed down to capital markets-related activities may come from operational challenges, such as granularity of credit institutions' information and differences in the pricing structure and the allocation of certain fees and commissions to predefined categories. At least some institutions will not have the information available at the required structure and granularity. This in addition to challenges related to the assessment of Taxonomy alignment leads to an assessment that

²¹ The figure is 7.1% for the overall FINREP sample.

²² On broader terms, supervisory data show that in aggregate over 90% of assets on credit institutions' balance sheets are measured at amortised cost. The remaining is measured either at fair value through other comprehensive income (4%) or fair value through profit or loss (6%).

costs of implementation of the Fees and Commissions KPI would be relatively high, while the resulting values of this KPI would be expected to be low.

32. Finally, the disclosure of fees and commissions income from services that are assessed to be related to capital markets such as issuance or other services related to third party securities and mergers and acquisition undertakings advisory services may reveal confidential information. This may occur when a credit institution discloses Fees and Commissions KPI based on a low number of issuances and advisory services. Given the relatively low number of for example issuances in accordance with the EU Green Bond Standard and relatively large number of credit institutions the disclosures may reveal the fees and commissions charged by a credit institution for a single service provided to a client.

2.2. Preliminary advice and questions for public consultation

33. In its Call for Advice the European Commission requested the EBA to explore ways to simplify and improve the usability of the Fees and Commissions KPI by narrowing down the scope of the KPI to activities related to capital markets. The analysis presented shows that amongst the list of activities related to credit institutions' fees and commissions income, there are four that can be directly linked to capital market activities. The activities may also have a link with the underlying asset, highlighting their relevance in the context of transparency regarding capital that is allocated to sustainable economic activities. These are:
- a. issuance or other services related to third party securities (a);
 - b. mergers and acquisition undertakings advisory services (c);
 - c. undertakings finance services related to capital market advisory for undertakings, clients or other (d); and
 - d. distribution of products issued by entities outside the prudential group to its current customers (i).
34. The EBA is of the opinion that while these service-based activities of credit institutions may in some cases be relevant for the growth of Taxonomy-aligned economic activities, the overall design of the KPI should be considered in terms of three aspects:
- a. the limitations of the KPI as an indicator for the purpose of Taxonomy disclosures from user's point of view;
 - b. the materiality of the KPI and costs associated with its computation with respect to its benefits, from the preparer's point of view; and
 - c. the overall objective to simplify the regulatory framework and improve its usability.
35. An additional consideration is also operational. The EBA is currently consulting on revisions to the ITS on supervisory reporting (Commission Implementing Regulation (EU) 2024/3117) - Module on FINREP.²³ In this revision the EBA is proposing, amongst others, the deletion of the datapoints related to these four elements from Template 22.1. As per the proposal, while these

²³ [Link](#) to the EBA consultation paper

activities will still be captured in the aggregate information, specific datapoints will no longer be available.

36. Based on these considerations, the EBA is of the opinion that two options can be considered:
- a. removing the Fees and Commissions KPI from the Taxonomy disclosure requirements and potentially introducing qualitative disclosures also considering the 10% materiality threshold to be applied in relation to total operating income;
 - b. narrowing down the scope of the KPI to four activities identified in this analysis and adjusting the disclosure requirements, accordingly, also introducing the 10% materiality threshold to be applied in relation to total operating income.
37. Under the option of removing the KPI from disclosure requirements, the introduction of qualitative disclosure requirements should be considered for those institutions with material fees and commissions income. Qualitative information requirements could cover the alignment of services with Taxonomy Regulation, including overall composition, trends observed, objectives and policy.

Questions for public consultation

Q2. Do you agree with the analysis presented?

Q3. In your view, which of the options presented in the analysis (paragraph 36) is the most viable? Please explain your rationale.

- a. removing the Fees and Commissions KPI from the Taxonomy disclosure requirements or replacing it with qualitative disclosure requirements considering 10% materiality threshold;
- b. narrowing down the scope of the KPI to following four activities identified in this analysis and adjust the disclosure requirements accordingly also introducing the 10% materiality threshold to be applied in relation to total operating income.
 - issuance or other services related to third party securities,
 - mergers and acquisition undertakings advisory services,
 - undertakings finance services related to capital market advisory for undertakings, clients or other, and
 - distribution of products issued by entities outside the prudential group to its current customers.

In your response, where applicable, please assess whether voluntary disclosure of this KPI would be meaningful and feasible, and hence should be considered.

Q4. Should additional items from FINREP Template 22.1 also be included in the revised KPI? Please consider in particular that (i) have been assessed as *unrelated* to capital market activities, e.g. 'custody and other related services', and (ii) those that have not been mapped to the Fees and Commissions KPI, such as 'structured finance', 'loans granted', 'commodities'.

Q5. Do you have evidence and/or arguments on potential costs and benefits associated with disclosing the Fees and Commissions KPI?

3. Issue 2: Trading Book KPI

3.1. Analysis

3.1.1. Current requirements

38. Commission Delegated Regulation (EU) 2021/2178 requires credit institutions, whose trading portfolio plays an important role in their business models, to disclose quantitative information and KPIs that show to what extent the institution is trading with environmentally sustainable assets and to what extent it is contributing to promoting the trading of this type of assets.
39. The importance of the trading portfolio of a credit institution was initially quantitatively defined in relation to Article 94(1) and Article 325(a)(1) of Regulation (EU) No 575/2013. These articles allow, under certain conditions, derogations for small trading book business and set out conditions for using the simplified standardised approach for prudential regulation purposes.
40. In accordance with section 1.2.4 of Annex V to Commission Delegated Regulation (EU) 2021/2178, when credit institutions do not meet these conditions, their trading portfolios are categorised as important and hence credit institutions with these portfolios are required to disclose the Trading Book KPI under Taxonomy disclosure requirements.
41. The materiality threshold for the Trading Book KPI has been amended by the Omnibus simplification package²⁴ which replaced it with the materiality threshold of exempting credit institutions from disclosure requirements for their economic activities that are not financially material for their business, e.g. those not exceeding 10% of their total turnover or total assets.
42. The Trading Book KPI²⁵ is constructed as:
 - a. total trading during the disclosure period in Taxonomy-aligned instruments, including absolute purchases plus absolute sales of environmentally sustainable securities measured at fair value (numerator); and
 - b. total trading during the disclosure period of instruments, including total absolute purchases plus total absolute sales measured at fair value (denominator).
43. The scope of the instruments for the KPI is limited to debt securities and equity instruments. When the use of proceeds related to the underlying economic activity is known, the numerator of the KPI is estimated by weighting the gross carrying amount of instruments purchased and/or sold with the proportion of turnover and CapEx associated with Taxonomy-aligned economic

²⁴ Commission Delegated Regulation (EU) 2026/73 Annex V paragraph 2 amends the third paragraph in Section 1.2.4.

²⁵ The Trading Book KPI is based on trading volume information in the Basel Committee G-SIB assessment reporting instructions ([link](#))

activity of the undertaking (issuer) contributing to the relevant environmental objective as disclosed by that undertaking (issuer) in accordance with Taxonomy Regulation. When the use of proceeds is unknown the ratio to be applied is the overall taxonomy alignment KPI of the undertaking's activities.

44. Furthermore, in accordance with Annex XI of Commission Delegated Regulation (EU) 2021/2178, credit institutions with no significant trading book and hence no obligation to disclose the Trading Book KPI, are required to disclose qualitative information on the alignment of trading portfolios with Taxonomy Regulation, including overall composition, trends observed, objectives and policy.
45. The Trading Book KPI has not yet been disclosed by credit institutions. Article 10 of Commission Delegated Regulation (EU) 2021/2178 requires the disclosure of the Trading Book KPI by credit institutions from 1 January 2026 and subsequently Commission Regulation 2026/73 amending Delegated Regulation (EU) 2021/2178 further postpones the disclosure date of this KPI to 1 January 2028. As a result, credit institutions are required to disclose Trading Book KPI from that date.

3.1.2. Connecting the KPI to market liquidity

46. In its targeted Call for Advice the European Commission requested the EBA to explore ways to narrow down the scope of the Trading Book KPI to providing market liquidity through market making, with a clear focus on providing liquid markets for green (Taxonomy-aligned) securities.
47. Connecting the Trading Book KPI to market liquidity requires a qualitative assessment of whether or to what extent credit institutions can act as market makers for Taxonomy-aligned debt securities and equity instruments.
48. Credit institutions' trading portfolios reflect several activities such as proprietary trading, client facilitation, arbitrage trading or hedging activities in various commodities and financial instruments.
49. Article 4 of Directive 2014/65/EU defines *'market maker'* as a person who holds himself out on the financial markets on a continuous basis as being willing to deal on own account by buying and selling financial instruments against that person's proprietary capital at prices defined by that person.
50. Commission Delegated Regulation (EU) 2017/578²⁶ establishes technical standards for market making agreements and schemes, aiming to enhance liquidity, predictability, and stability in EU financial markets, especially during stressed conditions. The Regulation, amongst others, aims to set requirements for investment firms engaged in algorithmic market making and for trading venues facilitating such activities.²⁷

²⁶ Commission Delegated Regulation (EU) 2017/578 OJ L 87, 31.3.2017, pp. 183 - 188

²⁷ As stated in recital (38) in Directive 2014/65/EU, *Credit institutions that are authorised under Directive 2013/36/EU should not need another authorisation in order to provide investment services or perform investment activities.*

51. Against this background, credit institutions as market makers participate in financial markets and continuously provide both bid prices and ask prices for a security or asset, thereby supplying ongoing liquidity to the market.
52. Market making activities relate to credit institutions' positions held for trading primarily in the secondary markets and credit institutions' market making activities can cover instruments such as environmentally sustainable bonds aligned with Taxonomy Regulation and equity instruments issued by corporate undertakings with Taxonomy-aligned activities. Credit institutions can support growth for such activities by providing liquidity.
53. The trading book may cover the trading of a large range of instruments, issuers and sectors. While the trading book covers all types of instruments and counterparties including those located in third countries, current Taxonomy disclosure requirements already limit the scope of the KPI to debt securities and equity instruments issued by non-financial and financial corporates in the scope of the CSRD. A potential approach to refocus credit institutions' Trading Book KPI is to narrow down its scope to credit institutions' market making activities.

3.1.3. Materiality of the KPI

54. The materiality analysis is based on a sample of 125 credit institutions that reported FINREP supervisory data to the EBA as of September 2025 and are subject to the CSRD requirements, representing 64% of total assets²⁸ in the EU.²⁹
55. The gross carrying amount of total assets held for trading is EUR 5 trillion in the EU/EEA banking sector representing 22% of their total assets.³⁰ Figure 4 (Annex II) shows the distribution of the size of credit institutions' trading book. Debt securities and equity instruments are 39%³¹ of total trading book assets, while the remaining are derivatives and loans and advances. Debt securities and equity instruments held on the trading book are 3% and 2% of the total assets³², respectively.
56. Furthermore, an analysis of the materiality of credit institutions' trading book portfolios in relation to total assets shows that currently 21 credit institutions, representing 17% of all institutions that fall under the scope of the CSRD would have a trading portfolio (covering all instruments) larger than 10% of their total assets (Figure 5 in Annex II).³³

²⁸ Total assets are proxied by the leverage ratio exposures of the credit institutions.

²⁹ The overall sample of institutions in FINREP is 329 covering 84% of total assets in the EU/EEA. The statistics for CSRD eligible institutions in the overall FINREP sample will be compared to the statistics of the overall FINREP sample throughout the analysis to provide a comparative perspective. Such comparative perspective would provide an additional robustness check to the analysis.

³⁰ 6.4 trillion representing 21% of total assets, if the overall FINREP sample is considered.

³¹ This figure is the same if the overall FINREP sample is considered.

³² This is also 3% and 2% respectively when the overall FINREP sample is considered.

³³ This yields a comparable but different result in relation to the previous threshold set out in the Disclosure Delegated Act. This is presented in Table 5 in Annex II.

3.1.4. Relevance of the KPI

57. In general, while trading activities can contribute to support market liquidity, including for Taxonomy-eligible and Taxonomy-aligned instruments, Trading Book KPI mainly reflects short-term secondary market activity and may not accurately indicate how credit institutions finance or allocate capital to Taxonomy-aligned activities.
58. Trading Book KPI, compared to GAR which covers assets on the banking book, represents a different way credit institutions manage their assets. The primary purpose of the banking book is relationship banking and long-term financial intermediation. This requires ongoing relationship with borrowers and corporate clients. This differs from trading book where credit institutions act primarily as a dealer, broker, market maker and enter short-term transactions. Client engagement is largely limited to execution of client trades, hedging, liquidity provision and market access.
59. Due to their short-term and volatile nature, trading activities and assets assigned in the trading book are in principle not intended to direct stable capital flows to any specific types of activities and may not reflect institution's long-term strategy in the context of sustainable finance. As a result, the Trading Book KPI based on the state of accounts as of any specific date is not a meaningful indicator to assess the sustainability strategy and commitments of a credit institution.
60. In addition, the actual trading volume would be determined by factors that are, at least partially, external to credit institutions, such as market size and liquidity (demand and supply), size of the investment, credit rating of the issuer or similar, and the KPI would capture more general market movements. As a result, the sustainability features of the underlying asset and economic activity is, in most cases, not expected to be a primary driver for trading activities and is not directly related to credit institutions' strategies in sustainable finance.
61. Potential operational challenges for credit institutions may also be present. While the trading book covers a large number of short-term transactions, credit institutions would often not have access to all information and time necessary to assess the Taxonomy alignment of the underlying economic activity related to the issuer. This reasoning is applicable to all aspects of the trading book including also the market making activities.
62. Trading Book KPI could be reconsidered with the aim to focus on market liquidity through market making, where contribution to sustainability objectives would be considered through providing liquid markets for Taxonomy-aligned securities. Such focused KPI could include in the scope of disclosures credit institutions that are registered on a trading venue in order to deal on its own account in at least one financial instrument tradable in line with the conditions set out in the market making programmes of regulated trading venues. These credit institutions registered as market makers would then need to calculate the KPI based on the Taxonomy alignment of the financial instruments covered under market making activities, which would depend on the Taxonomy alignment of the underlying economic activity. Given the current scope of the Taxonomy disclosures, potential further narrowing down of this KPI could be considered to market making in the area of cover bond issuances by corporates, where some of these issuances would be in line with the EU Green Bond Standard.

3.2. Preliminary advice and questions for public consultation

63. In its Call for Advice the European Commission requested the EBA to explore ways to narrow down the scope of the Trading Book KPI to providing market liquidity through market making, with a clear focus on providing liquid markets for green (Taxonomy-aligned) securities.
64. Trading book of credit institutions involves a wide range of trading activities and assets. In terms of type of instruments, the current regulation is already limiting the scope to eligible financial and non-financial corporate issuances of debt securities and equity instruments.
65. In addition to this, market making activities of the credit institution is only one component of the trading book activities.³⁴ Engaging in market making activities depends on the risk appetite, strategy, capabilities and the business drive of the credit institution and the modalities of the trade, including covered instruments, and are bound by written market making agreements with trading venues.
66. The EBA is of the opinion that limiting the Trading Book KPI to market making activities of the credit institutions would significantly limit the scope and reduce the relevance of the KPI, as other than market making activities may also contribute to providing liquidity.
67. The EBA is also of the opinion that while the trading book may be a significant component in some credit institutions' business models, and these credit institutions can support market growth for Taxonomy-aligned investments through providing market liquidity through market making, the overall design and impact of the KPI should be considered in terms of three aspects:
- a. the limitations of the KPI as an indicator for the purpose of Taxonomy disclosures from users' and investors' point of view;
 - b. the materiality of the KPI, and operational challenges and costs associated with its computation with respect to its benefits, from the preparer's point of view; and
 - c. the overall objective to simplify and improve the regulatory framework.
68. Based on these considerations, the EBA is of the opinion that two options can be considered:
- a. replacing the Trading Book KPI with qualitative disclosure requirements on the trading portfolio also considering the 10% materiality threshold;
 - b. narrowing down the scope of the KPI to providing market liquidity through market making, with a clear focus on providing liquid markets for Taxonomy-aligned securities, potentially focussing only on market making activities in the area of bonds.
69. Qualitative information requirements could leverage the existing provisions which request for credit institutions to disclose qualitative information on the alignment of trading portfolios with Taxonomy Regulation, including overall composition, trends observed, objectives and policy.

Questions for public consultation

³⁴ Also, market making is only one of the several ways credit institutions provide liquidity in markets.

Q6. Do you agree with the analysis presented?

Q7. In your view, which of the options presented in the analysis (paragraph 68) is the most viable? Please explain your rationale.

- a. removing the Trading Book KPI or replacing it with qualitative disclosure requirements on the trading portfolio also considering the 10% materiality threshold;
- b. narrowing down the scope of the KPI to providing market liquidity through market making, with a clear focus on providing liquid markets for green (Taxonomy-aligned) securities.

In your response, where applicable, please assess whether voluntary disclosure of this KPI would be meaningful and feasible, and hence should be considered.

Q8. Do you have evidence and/or arguments on potential costs and benefits associated with disclosing the Trading Book KPI?

4. Issue 3: ‘Other services’ KPI for investment firms

4.1. Analysis

4.1.1. Current requirements

70. Commission Delegated Regulation (EU) 2021/2178 requires investment firms to disclose a KPI indicating the extent to which investment firms’ investment services and activities other than dealing on own account are eligible and aligned with Taxonomy Regulation. These investment services and activities together with dealing on own account activities are defined in accordance with Section A of Annex I to Directive 2014/65/EU and part of supervisory reporting for investment firms.
71. Investment firms’ dealing on own account activities are presented in a separate KPI due to its different nature. Dealing on own account means trading against proprietary capital³⁵ resulting in the conclusion of transactions in one or more financial instruments. In dealing on own account activities investment firms keep the investment assets on their books, while other investment services and activities, which are in the scope of the KPI under this analysis, are conducted on behalf of investment firms’ clients. Accordingly, the latter has no direct impact on own capital and asset allocation of the investment firm and the KPI in question is related to fees and commissions, and other monetary benefits investment firms may receive from their clients in return to their services.

³⁵ In practice dealing on own account may comprise also investment firm’s dealing on own account on behalf of clients when the investment firm deals on client’s behalf while keeping the assets on its own books.

72. Investment services and activities included in investment firms' 'other services' KPI are presented in Table 3 together with their definitions.

Table 3 Elements of investment firms' 'other services' KPI³⁶

Element of the KPI	Definition in accordance with Art. 4 of Directive 2014/65/EU except for (a), (f) and (g), where descriptions are based on commonly used understanding
(a) Reception and transmission of orders in relation to one or more financial instruments	Reception of an order from a client or results from decision to acquire or dispose of a specific financial instrument in accordance with a discretionary mandate provided by one or more clients
(b) Execution of orders on behalf of clients	acting to conclude agreements to buy or sell one or more financial instruments on behalf of clients and includes the conclusion of agreements to sell financial instruments issued by an investment firm or a credit institution at the moment of their issuance
(d) Portfolio management	managing portfolios in accordance with mandates given by clients on a discretionary client-by-client basis where such portfolios include one or more financial instruments
(e) Investment advice	the provision of personal recommendations to a client, either upon its request or at the initiative of the investment firm, in respect of one or more transactions relating to financial instruments
(f) Underwriting of financial instruments and/or placing of financial instruments on a firm commitment basis	commitment to take up financial instruments and finding investors for securities on behalf of the seller and may involve commitment to take up those securities where other investors do not acquire them
(g) Placing of financial instruments without a firm commitment basis	as in (f) finding investors for securities on behalf of the seller but without commitment to take up those securities where other investors do not acquire them
(h) Operation of an MTF	'multilateral trading facility' or 'MTF' means a multilateral system, operated by an investment firm or a market operator, which brings together multiple third-party buying and selling interests in financial instruments – in the system and in accordance with non-discretionary rules – in a way that results in a contract in accordance with Title II of this Directive
(i) Operation of an OTF	'organised trading facility' or 'OTF' means a multilateral system which is not a regulated market or an MTF and in which multiple third-party buying and selling interests in bonds, structured finance products, emission allowances or derivatives are able to interact in the system in a way that results in a contract in accordance with Title II of this Directive

73. The numerator of the KPI includes the weighted average of the total revenue including the fees, commissions and other monetary benefits, generated from these investment services and activities in relation to the aggregate value of the Taxonomy-eligible, and turnover and CapEx Taxonomy-aligned economic activities within the activities of the clients. The denominator is the total revenue from services provided to undertakings.

4.1.2. Elements of the KPI related to capital markets

74. In line with the request for the Fees and Commission KPI of credit institutions, the European Commission requested the EBA to explore ways to narrow down the scope of the investment firms' KPI other than dealing on own account to activities related to capital markets. This calls for the identification of services related to capital markets and where the activity may have a

³⁶ Letters in the first column refer to the list of investment services and activities presented Taxonomy disclosure requirements. It excludes (c) dealing on own account.

clear connection to environmentally sustainable finance in which investment firms, through their services, can act as enablers facilitating capital flows towards sustainable investment.

75. Such assessment is presented in Table 4 and suggests that the KPI can be limited to four elements as they appear to be relevant for capital markets in the context of sustainable finance.

This includes:

- a. portfolio management (d);
- b. investment advice (e);
- c. underwriting of financial instruments and/or placing of financial instruments on a firm commitment basis (f); and
- d. placing of financial instruments without a firm commitment basis (g).

76. Other elements in the KPI are mostly transactional where the investment firm through this service has no direct impact on the underlying financial asset associated with the economic activity. In those cases, the service provided by the investment firm does not have a direct effect on the nature of the investment, including its sustainability characteristics.

Table 4 Assessment of investment firms' services in terms of their relevance to capital markets

Element of the KPI	Assessment
(a) Reception and transmission of orders in relation to one or more financial instruments	In this service, the investment firm acts as an intermediary between the client and the agent operating in the market. The service typically includes obtaining client instructions, receiving order and transmitting the order to the relevant third party for execution. While the nature of the financial instrument being transmitted can be taxonomy eligible and aligned, the investment firm's service has no direct impact on the underlying asset.
(b) Execution of orders on behalf of clients	This service involves typically taking a client order, deciding how the order will be executed, placing or matching the trade, and completing the transaction for the client. The order may be executed through various means such as on an MTF or by dealing on own account. While the investment firm is responsible for carrying out the trade, through this service it has no direct impact on the underlying asset.
(d) Portfolio management	Investment firm is charged of managing portfolios in accordance with mandates given by their clients. In practice this involves the firm making investment decisions on the client's behalf and the firm can execute transactions without obtaining prior approval for each single trade. In this service, the investment firm has the discretion to decide on the investment actions within the limits of the agreed mandate and investment strategy. While the power to take an investment decision is shared between the client and the investment firm, in this service the investment firm has some discretion and influence over the investment that can be linked to taxonomy eligible and aligned activities.
(e) Investment advice	Investment firm can suggest clients a course of action in relation to investment preferences including risk tolerance, objectives, financial considerations. While the ultimate decision does not lay with the investment firm and the investment advice is defined as a response to client's investigation for a specific investment decision, investment advice can support channelling capital towards taxonomy eligible and taxonomy aligned activities. ESMA issued a supervisory briefing on understanding of investment advice under MiFID II. ³⁷
(f) Underwriting of financial instruments and/or placing of financial instruments on a firm commitment basis	This service broadly relates to cases where investment firm helps an issuer raise capital, e.g. for commercial purposes in primary markets, by committing to distribute securities to investors, and assumes financial risk if the securities are not fully sold. This service may relate to sustainable financial instruments, such as green bonds and

³⁷ ESMA35-43-3861, 11 July 2023

	syndicated offerings. Sustainability features of the instrument may play a role in investment firm's servicing decisions, and while the investment firm's is acting on behalf of its client, its involvement may have a direct impact the underlying asset.
(g) Placing of financial instruments without a firm commitment basis	Similarly to the service (f) above, investment firm helps an issuer raise capital but in this case without commitment that it does not guarantee sale of the financial instrument. Investment firm's involvement through this service may have a direct impact the underlying asset.
(h) Operation of an MTF	This is a purely operational service where trades are matched according to predetermined rules. The operator cannot arbitrarily choose which trades occur. Investment firm's operation of an MTF does not have a direct impact the underlying asset.
(i) Operation of an OTF	Similarly to the service (h) above, operation of an OTF is a purely operational service where trades are matched according to predetermined rules. While the investment firm operating the OTF may exercise some discretion, this is limited to the operational aspects. Investment firm's operation of an OTF does not have a direct impact the underlying asset.

4.1.3. Materiality of the KPI

77. Supervisory data indicate that the total gross revenue from investment services in the scope of the Taxonomy disclosures is EUR 8.7 billion³⁸ of which over 18% or EUR 1.6 billion is related to dealing on own account activities. As a result, total annual gross revenue generated from services included under the scope of the investment firms' 'other services' KPI is EUR 7 billion of which portfolio management is 90%. Figure 6 (Annex II) shows the composition of total annual gross revenue of investment firms generated from these services.

4.1.4. Relevance of the KPI

78. KPI on investment services and activities is important as they can impact the allocation of capital in the context of sustainable finance especially portfolio management and investment advice, but also when the investment firm underwrites and/or places financial instruments in the market.

79. This KPI applies to all investment firms that fall under the scope of the CSRD. Current (prudential) rules for investment firms define these firms in three categories, "Class 1", "Class 2" and "Class 3" categories, based on their size, activities and systemic importance.³⁹ Accordingly, investment firms that perform dealing on own account or underwriting of financial instruments and/or placing of financial instruments on a firm commitment basis and meet a EUR 30 billion threshold for their consolidated assets are categorised as "Class 1" firms, and investment firms that perform dealing on own account or underwriting of financial instruments and/or placing of financial instruments on a firm commitment basis and meet a EUR 15 billion threshold in terms of their consolidated assets or meet a EUR 5 billion threshold and are designated by their competent authorities following specific criteria are categorised as "Class 1 minus" firms. While "Class 1" firms have to apply to be authorised as credit institutions, "Class 1 minus" firms remain authorised as investment firms.

80. This KPI is in practice relevant not only for investment firms but also eligible standalone credit institutions and credit institution-led groups offering investment services (see Section 6 for a

³⁸ Supervisory data with reference date of end-September 2025 cover 141 investment firms.

³⁹ For an overview of the prudential framework for investment firms, see the [link](#)

discussion on group reporting). Due to lack of clear evidence and data available to the EBA, the universe of standalone investment firms that are not credit institutions, i.e. “Class 1” investment firms, falling under the scope of the Taxonomy disclosures is unclear. Given their size and the scope of the CSRD, the EBA expects that only a small share of investment firms, which are not credit institutions including “Class 1 minus”, “Class 2” and “Class 3” investment firms, would fall under the scope of Taxonomy disclosure requirements.

81. The ‘other services’ KPI for investment firms yields revenue-based information and sensitive to the pricing of these services. The arguments presented above regarding the Fees and Commission KPI for credit institutions would be generally applicable in this case. Accordingly, consideration may be given to amending this KPI to reflect the value of assets covered by these services rather than the monetary benefits generated. A KPI reflecting the value of asset under management, whether discretionary or non-discretionary, would cover two principal activities of portfolio management and investment advice. It would also align with the design of existing KPIs applicable to other financial undertakings, including the off-balance sheet AuM KPI for credit institutions and the KPI for asset managers established under Disclosures Delegated Act.

4.2. Preliminary advice and questions for public consultation

82. In line with the request for the Fees and Commission KPI of credit institutions, in its Call for Advice the European Commission requested the EBA to explore ways to narrow down the scope of the investment firms’ KPI other than dealing on own account to activities related to capital markets. The analysis presented shows that amongst the list of investment services and activities related to investment firms’ ‘other services’ KPI, there are four that can be directly linked to capital market activities where at the same time the service has a link with the underlying asset and through this service investment firm may influence the flow of capital to sustainable economic activities. These are:
- a. portfolio management (d);
 - b. investment advice (e);
 - c. underwriting of financial instruments and/or placing of financial instruments on a firm commitment basis (f); and
 - d. placing of financial instruments without a firm commitment basis.
83. The EBA is of the opinion that the KPI can be narrowed down to these four services and further amendment of the KPI can be considered to reflect the value of assets covered by these services rather than the monetary benefits generated. This would align the methodology with that applied to the off-balance sheet KPI for credit institutions and the KPI for asset managers.

Questions for public consultation

Q9. Do you agree with the analysis presented and the conclusion to narrow down the investment firms’ KPI?

Q10. Do you agree with limiting the KPI to the following four elements for the purpose of Taxonomy disclosures?

- Portfolio management;
- Investment advice;
- Underwriting of financial instruments and/or placing of financial instruments on a firm commitment basis; and
- Placing of financial instruments without a firm commitment basis.

Please explain if you think that other services, e.g. execution of orders on behalf of clients, should be included in the revised KPI.

Q11. Do you consider it more appropriate for the KPI to reflect the value of assets under management covered by the investment services rather than the monetary benefits generated?

5. Issue 4: Grandfathering period for financial exposures

5.1. Analysis

5.1.1. Current requirements

84. Grandfathering is a provision by which an old rule continues to apply to specific existing situations while a new rule will apply for future cases. In the context of Taxonomy Regulation and the qualification of Taxonomy-aligned financial products, this means that first, the issuer allocates the proceeds from a financial product to finance an economic activity in accordance with the applicable technical screening criteria at the point of origination, and second, grandfathering provision determines, when the applicable technical screening criteria are revised after the origination, the amount of time allowed for the issuer to align the proceeds of the financial product in line with the revised technical screening criteria.
85. The provision on grandfathering in paragraph 5 of Article 7 of Disclosures Delegated Act as amended by the Omnibus package⁴⁰ allows financial institutions to continue qualifying Taxonomy-aligned instruments under the old rules until five years after the revision of the technical screening criteria.

Box 1 Grandfathering rules under Disclosures Delegated Act

Disclosures Delegated Act - Article 7 (Disclosure rules common to all financial undertakings), paragraph 5

⁴⁰ Commission Delegated Regulation (EU) 2026/73 amending Delegated amending Delegated Regulation (EU) 2021/2178 as regards the simplification of the content and presentation of information to be disclosed concerning environmentally sustainable activities and Delegated Regulations (EU) 2021/2139 and (EU) 2023/2486 as regards simplification of certain technical screening criteria for determining whether economic activities cause no significant harm to environmental objectives.

Where the technical screening criteria laid down in the delegated acts adopted pursuant to Articles 10(3), 11(3), 12(2), 13(2), 14(2) or 15(2) of Regulation (EU) 2020/852 are amended, the loans and instruments whose use of proceeds is known and that are held by financial undertakings that finance taxonomy-aligned economic activities or assets, shall in the absence of alignment of the financed economic activities or assets with the amended technical screening criteria, be reported as such under this Regulation until five years after the date of application of the delegated acts that amend those technical screening criteria.

86. The grandfathering provision specified in Article 8 of EU Green Bond Regulation⁴¹, which applies exclusively for bonds as financial products, differs from the provision specified in the Disclosures Delegated Act. The scope of activities covered in the grandfathering provision are exclusively unallocated proceeds of European green bonds and proceeds of European green bonds financing an eligible CapEx that have not yet met the Taxonomy requirements. These activities are limited to seven years of grandfathering period. EU Green Bond Regulation also sets out requirements for cases where the proceeds are allocated to a portfolio of fixed assets or financial assets and further transparency requirements relate to the application of grandfathering rules.

Box 2 Grandfathering rules under EU Green Bond Standard

EU Green Bond Regulation - Article 8 (Application of the technical screening criteria and grandfathering)

1. Where issuers allocate the proceeds of European Green Bonds to the uses set out in Article 4(1) and (3), they shall ensure that:

(a) those proceeds are allocated in alignment with the technical screening criteria applicable at the time of issuance of the bond;

(b) where technical screening criteria are amended after the issuance of the bond, the following proceeds be allocated in alignment with the amended technical screening criteria no later than seven years after the date of application of the amended criteria:

(i) proceeds that are not yet allocated; and

(ii) proceeds that are covered by a CapEx plan in accordance with Article 7, that have not yet met the taxonomy requirements.

2. Where issuers allocate proceeds in accordance with the portfolio approach, issuers shall include in their portfolio only those assets whose underlying economic activity is aligned with any technical screening criteria which were applicable at any point during the seven years prior to the date of publication of the allocation report.

3. Where the proceeds of an outstanding bond are at risk of not being aligned with paragraph 1, point (b)(ii), the issuer shall draw up, submit to external review by an external reviewer and

⁴¹ Regulation (EU) 2023/2631 of the European Parliament and of the Council of 22 November 2023 on European Green Bonds and optional disclosures for bonds marketed as environmentally sustainable and for sustainability-linked bonds, OJ L, 2023/2631

publish a plan for aligning them to the extent possible with the amended technical screening criteria and for mitigating to the extent possible the negative consequences of the lack of full alignment with the amended technical screening criteria. The issuer shall publish that plan before expiry of the period set out in paragraph 1, point (b).

4. Alignment with the relevant technical screening criteria shall be demonstrated in the allocation report referred to in Article 11.

5.1.2. Cases for grandfathering

87. Grandfathering rules in both the Disclosures Delegated Act and EU Green Bond Regulation are applicable only to financial instruments with known use of proceeds. Credit institutions, investment firms, asset managers and insurance and reinsurance undertakings invest in economic activities of non-financial and financial undertakings through largely investing in the issuances of the investee companies' debt securities and equity instruments. In addition to this, credit institutions originate loans to finance Taxonomy-aligned economic activities of non-financial and financial undertakings. Grandfathering rules would then apply to all these instruments in the scope of the Taxonomy disclosure requirements as long as they are use-of-proceeds instruments.
88. Grandfathering rules in EU Green Bond Regulation cover unallocated proceeds related to financial products financing Taxonomy-aligned economic activities and exclude from the scope allocated proceeds allowing unlimited grandfathering for proceeds that have been already allocated before the change in the rules. Such distinction between the treatment of allocated proceeds and unallocated proceeds is not explicitly stated in the Disclosures Delegated Act which suggests that the grandfathering period covers the alignment of both unallocated and allocated proceeds.
89. Grandfathering rules have additional implications in relation to asset liability management of credit institutions. Credit institutions may fund their Taxonomy-aligned loans, for example to finance Taxonomy-aligned residential real estate, through issuances in line with the EU Green Bond Regulation.

5.2. Preliminary advice and questions for public consultation

90. The European Commission requested the EBA, in cooperation with ESMA and EIOPA, to explore ways to align rules for grandfathering period for financial exposures with the approach under the EU Green Bond Standard.
91. The EBA is of the opinion that aligning the grandfathering period and scope for financial exposures with the approach under the EU Green Bond Standard would improve consistency and predictability. This is especially the case for long-term debt securities but also for credit institutions' Taxonomy-aligned loans that are funded through the proceeds of debt securities issued in line with Taxonomy Regulation. The application of this approach to all relevant use-of-proceeds financial instruments in the scope of the Disclosures Delegated Act would further improve consistency.
92. More precisely, the EBA advises that:

- a. Disclosures Delegated Act be amended to align the grandfathering rules with the approach under EU Green Bond Regulation and allow seven-years grandfathering period;
- b. grandfathering rules cover both unallocated proceeds of use-of-proceeds financial instruments such as loans, debt securities and equity and the proceeds of financial instruments financing eligible capital expenditure; and
- c. transparency requirements specified in paragraph 3 of Article 8 of EU Green Bond Regulation are reflected by the undertakings as part of the qualitative information accompanying the KPIs disclosed under Disclosures Delegated Act.

Questions for public consultation

Q12. Do you agree with the analysis presented and the conclusion to align the grandfathering rules with the approach set out in EU Green Bond Regulation?

6. Issue 5 (horizontal): Group-level reporting

6.1. ESAs' common approach to the issue

93. The European Commission's Call for Advice requests the ESAs to work on horizontal issues in a coordinated way. In line with their respective mandates, the ESAs have therefore agreed to address the issues concerning group reporting based on the common identification of the relevant fact patterns and practical issues, as well as on the determination of shared principles based on which possible solutions could be proposed. These common aspects are set out in the next paragraphs.

94. The discussion of specific sectorial issues and the related possible solutions are then specified in each of the ESAs consultation documents, notably: credit institution-led groups and financial conglomerates are addressed in this Discussion Paper; insurance and reinsurance undertaking-led groups and financial conglomerates in EIOPA's Consultation Paper [\[link\]](#); non-financial undertaking-led groups and asset manager-led groups in ESMA's Consultation Paper [\[link\]](#).

95. The ESAs have analysed the following fact patterns:

1. Type of mixed group	2. Detailed assessment
Credit institution-led groups with any of the following subsidiaries: investment firm, asset manager, insurance and reinsurance undertaking and non-financial undertaking	This Discussion Paper Section 6
Insurance and reinsurance undertaking-led groups with any of the following subsidiaries: credit institution, investment firm, asset manager and non-financial undertaking	EIOPA Consultation Paper [link]

Asset manager-led groups with any of the following subsidiaries: credit institution, investment firm, insurance and reinsurance undertaking and non-financial undertaking	ESMA Consultation Paper [link]
Non-financial undertaking-led groups with any of the following subsidiaries: credit institution, investment firm, asset manager, insurance and reinsurance undertaking	ESMA Consultation Paper [link]

96. The ESAs identified driving principles for developing possible solutions to address the issues raised by the European Commission’s Call for Advice with respect to group reporting. Following the preliminary analysis, the ESAs are of the opinion that:

- a. Group-level Taxonomy disclosures should transparently reflect the degree of sustainability of the activities undertaken by the group as a whole, while acknowledging that the Taxonomy disclosure rules are not conceived to be sector-agnostic, but rather sector-specific. Therefore, combining KPIs that present activities that are fundamentally different in nature would not result in meaningful information for the users.
- b. The treatment of various sectors within a mixed group, e.g. a diversified financial group or a non-financial group with financial activities, should ensure consistency in treating similar circumstances.
- c. Proportionality considerations should inform the development of the proposed solutions, focusing on the disclosures that could be most impactful rather than promoting excessively granular disclosures which may detract focus from the material information.
- d. Mixed-group disclosures should be based, as a starting point, on the Taxonomy disclosures framework as defined by the Disclosures Delegated Act based on the nature and scope of consolidation with respect to the parent undertaking and complemented by additional information that is necessary to reflect the Taxonomy profile of the group as a whole, e.g. in a credit institution-led financial conglomerate with a material insurance business, additional information on the insurance subsidiary may be necessary.

6.2. Analysis

6.2.1. Current requirements

97. Commission Delegated Regulation (EU) 2021/2178 defines a set of templates and KPIs for the activities of non-financial and financial undertakings including credit institutions, investment firms, asset managers and insurance and reinsurance undertakings.
98. Annex V of the Disclosures Delegated Act, which defines the content of the KPIs to be disclosed by credit institutions, require credit institutions to disclose KPIs on the basis of the scope of their prudential consolidation determined in accordance with Regulation (EU) No 575/2013, Part One, Title II, Chapter 2, Section 2.

99. This requirement establishes that financial holding companies⁴² and mixed financial holding companies⁴³ that are required to comply with these requirements on the basis of their consolidated situation should carry out a full consolidation of all institutions and financial institutions that are their subsidiaries. Joint arrangements and investments in associates are generally accounted for using the equity method. The same consolidation requirements would also apply to credit institutions-led financial conglomerates⁴⁴.
100. Prudential scope of consolidation is the basis of credit institutions' financial reporting to their supervisors. As a result, the scope of consolidation for the purposes of Taxonomy disclosures is based on the existing regulatory framework and practices.

Box 3 Prudential scope of consolidation in accordance with Regulation (EU) No 575/2013

(Prudential) consolidated situation, according to point 47 of paragraph 1 of Article 4 of Regulation (EU) No 575/2013 means *the situation that results from applying the requirements of this Regulation in accordance with Part One, Title II, Chapter 2 to an institution as if that institution formed, together with one or more other entities, a single institution.*

The implementation of the prudential scope of consolidation relies fundamentally on the definitions provided in Article 4(1) of the Regulation (EU) No 575/2013, which establishes key concepts such as 'parent undertaking', 'subsidiary' or 'financial institution', which are instrumental to determine the scope and the method of consolidation of a prudential group.

Given the risk-based perspective and purpose of the prudential scope of consolidation framework, the scope established for the regulation generally only includes subsidiary undertakings that qualify as institutions or financial institutions, while excluding insurance or non-financial subsidiaries that do not give rise to comparable risks. This differs from the accounting perspective in which consolidation aims to represent a true and fair view of the group's financial position and performance. In this regard, the scope of consolidation is typically defined following the concept of 'control', and encompasses all subsidiaries controlled by the parent undertaking, irrespective of their business activities. Joint arrangements and investments in associates are generally accounted for using the equity method.⁴⁵

101. While the scope of consolidation for Taxonomy disclosure purposes is defined, this approach does not lead to a single KPI reflecting different financial activities of the group in aggregate. For example, a credit institution-led financial holding that issues loans and advances, and at the same time conducts both asset management and investment firm activities through their subsidiaries would need to disclose information in accordance with Article 3, Article 4 and Article 5 of the Disclosures Delegated Act. There is no explicit requirement in the Disclosures

⁴² In accordance with point 20 of paragraph 1 of Article 4 Regulation (EU) No 575/2013

⁴³ In accordance with point 21 of paragraph 1 of Article 4 Regulation (EU) No 575/2013

⁴⁴ In accordance with point 14 of Article 2 Directive 2002/87/EC

⁴⁵ EBA/REP/2026/01

Delegated Act requiring the parent undertaking to aggregate and compute these activities reflected in different KPIs in one single KPI.

102. The European Commission issued a notice⁴⁶ to introduce one single KPI for such cases. Accordingly, the KPI introduced in that notice would represent the weighted average of the corresponding KPIs of different activities with weightings in accordance with the proportion of turnover derived from the corresponding activities in the total consolidated turnover of the financial conglomerate or the mixed group.
103. For the treatment of subsidiary undertakings in the context of group disclosures, paragraph 9 of Article 19a Directive (EU) 2022/2464 sets the conditions to exempt subsidiary undertakings from the disclosure *obligations if such undertaking and its subsidiary undertakings are included in the consolidated management report of a parent undertaking, drawn up in accordance with Articles 29 and 29a of that Directive*. It is also specified under Article paragraph 4 of 29a Directive (EU) 2022/2464 that *where the reporting undertaking identifies significant differences between the risks for, or impacts of, the group and the risks for, or impacts of, one or more of its subsidiary undertakings, the undertaking shall provide an adequate understanding of, as appropriate, the risks for, and impacts of, the subsidiary undertaking or subsidiary undertakings concerned*.
104. Against this background and based on an initial assessment of existing market practices, credit institutions and credit institution-led groups disclose their KPIs related to different activities, separately where these activities are relevant and subject to materiality threshold⁴⁷. Table 6 (Annex III) provides an overview of the types of credit institutions-led group disclosures made by the parent undertaking subject to the requirements specified in Article 4 of Disclosures Delegated Act.

6.2.1. Implications of the prudential scope of consolidation

105. Most financial conglomerates in the EU/EEA are led by credit institutions⁴⁸ and apply the prudential scope of consolidation for their Taxonomy disclosures. This implies that a credit institution-led financial conglomerate, subject to financial materiality threshold, is required to disclose in their consolidated report, in addition to the information and KPIs required under Annex VI of Disclosures Delegated Act: (i) the information and KPIs required under Annex IV, if the institution-led financial conglomerate conducts asset management activities through a subsidiary, (ii) the information and KPIs required under Annex VIII, if the institution-led financial conglomerate conducts investment activities through a subsidiary.

⁴⁶ Commission Notice on the interpretation and implementation of certain legal provisions of the Disclosures Delegated Act under Article 8 of the EU Taxonomy Regulation on the reporting of Taxonomy-eligible and Taxonomy-aligned economic activities and assets (third Commission Notice) (C/2024/6691) (8.11.2024), see points 7 (related to financial conglomerates), 9 (mixed groups) and 11 (exposure to the parent undertaking of a mixed group or financial conglomerate).

⁴⁷ Each activity and KPI are subject to financial materiality threshold of 10% introduced in the Omnibus Delegated Act.

⁴⁸ The list of financial conglomerates 2025 (JC 2025 90) ([link](#)).

106. In this case, the assets (and liabilities) of the subsidiaries under the control of the parent credit institution, e.g. credit institution with more than 50% voting rights, are fully consolidated in credit institution's balance sheet. Where a credit institution has a subsidiary that is an insurance or financial undertaking, or holds a participation in such an undertaking, the subsidiary or participation is accounted for using the equity method. In practice, the investee's individual assets (and liabilities) are not consolidated line-by-line, but investment appears as a single line item on the balance sheet. This means that the equity participation of the credit institution in the insurance undertaking would be counted for in the GAR as part of the equity instruments. Box 4 provides a numerical illustration of the use of equity method in the context of Taxonomy group disclosures.

Box 4 Example for the use of equity approach in the context of Taxonomy group disclosures

Bank-led financial conglomerate A (undertaking A) owns 40% of an insurance undertaking B (undertaking B). Bank-led financial conglomerate A purchased these shares in insurance undertaking B for EUR 100 million.

This EUR 100 million appears on undertaking A's balance sheet as investment accounted under equity method. In Taxonomy disclosures for credit institutions (Annex VI), this is disclosed by undertaking A in line 6, that is equity instruments under financial undertakings in templates related to the calculation of GAR.

If insurance undertaking B has additional income of EUR 10 million in a year, i.e. if undertaking A's share in undertaking B's profit or loss account increase, undertaking A will have a line item in its income statement reporting EUR 4 million of income (this is 40% of EUR 10 million). Undertaking A's balance sheet account for its investment in insurance undertaking B will increase by EUR 4 million to EUR 104 million.

For Taxonomy disclosures, i.e. the calculation of GAR, the gross carrying amount of equity instruments on undertaking A's balance sheet representing the investment in undertaking B is multiplied by the relevant Taxonomy alignment KPI of the undertaking B.

If the undertaking B's Taxonomy alignment KPI is 3% then the Taxonomy alignment of the balance sheet assets disclosed by the undertaking A would be EUR 3.1 million (3% of EUR 104 million).

107. Where the credit institution has an insurance or non-financial subsidiary, the way the subsidiary is presented in the consolidated situation is defined in paragraph 7 of Article 18 of Regulation (EU) No 575/2013. The consolidation can be presented either through the equity method or another method depending on criteria set out in that Regulation. Furthermore, the EBA Guidelines (EBA/GL/2026/01) on ancillary services undertakings specifying the criteria for the identification of activities referred to in Article 4(1)(18) of Regulation (EU) No 575/2013 provide criteria that should be used to determine whether an undertaking performs activities that qualify as direct extension of banking within the meaning of Article 4(1)(18)(a) of Regulation (EU) No 575/2013. As a result, these Guidelines have implications on the way credit institutions apply the prudential scope of consolidation also in the context of Taxonomy disclosures.

108. Assets of the asset managers and investment firms as subsidiaries of a financial group led by a credit institution, such as buildings, software and other intangible assets are consolidated in the balance sheet of the credit institution. However, the assets under management and other related services and activities conducted by these subsidiaries are not reflected in the consolidated situation. As a result, these activities are not integrated directly in the GAR because in this case the assets are not owned by the credit institutions but their clients.

6.3. Preliminary advice and questions for public consultation

109. The European Commission requested ESAs to explore the development of simple but meaningful rules for disclosures Taxonomy KPIs at group level for groups providing both non-financial and financial services (group treatment), or different financial activities and services (insurance, lending, investment) and for subsidiary disclosures. This should ensure that there is a common approach for group treatment involving non-financial and financial undertakings.

110. The EBA is of the opinion that the current rules for credit institutions and credit institution-led groups such as financial conglomerates, financial holding companies and mixed financial holding companies should remain and be used to expand the existing rules in a consistent manner to apply for other cases.

111. More specifically the ESAs are of the opinion that:

- a. As a general rule, the group should disclose the KPI(s) relevant for the type of activity of the parent undertaking, following the rules set out in the Disclosures Delegated Act. Where a group is led by a financial holding company and that group is identified as a financial conglomerate in accordance with Directive 2002/87/EC⁴⁹, the KPI(s) should be those relevant for the entity leading the financial conglomerate.
- b. Additional relevant KPI(s) should be disclosed by material subsidiaries or intermediate parent undertakings, where the businesses undertaken by these entities are of a different nature than those carried out by the parent undertaking, necessitating the use of different KPIs. Directive 2013/34/EU⁵⁰ does not specify thresholds for triggering separate reporting within the group of the other businesses carried out by certain subsidiaries or groups of subsidiaries. Nevertheless, the Omnibus Delegated Act envisages a 10% materiality threshold, the application of which differs depending on the sectors considered. A similar criterion could be usefully introduced explicitly to

⁴⁹ DIRECTIVE 2002/87/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 16 December 2002 on the supplementary supervision of credit institutions, insurance undertakings and investment firms in a financial conglomerate and amending Council Directives 73/239/EEC, 79/267/EEC, 92/49/EEC, 92/96/EEC, 93/6/EEC and 93/22/EEC, and Directives 98/78/EC and 2000/12/EC of the European Parliament and of the Council, OJ L 35, 11.2.2003, p. 1

⁵⁰ Directive 2013/34/EU of the European Parliament and of the Council of 26 June 2013 on the annual financial statements, consolidated financial statements and related reports of certain types of undertakings, amending Directive 2006/43/EC of the European Parliament and of the Council and repealing Council Directives 78/660/EEC and 83/349/EEC, OJ L 182 29.6.2013, p. 19

determine which subsidiaries or groups of subsidiaries should warrant additional reporting alongside the disclosures stemming from the main group reporting regime.

- c. No or limited disclosure of additional KPI(s) by material subsidiaries or intermediate parent undertakings may be justified in cases where the businesses of these entities are sufficiently integrated within the group disclosures at consolidated level.
- d. When the other business activities are exclusively serving the group's internal needs, e.g. 'captive (re)insurance undertakings' or other internal financial services providers, there may be limited additional value in reporting on the Taxonomy profile of these activities which would be highly, if not entirely, correlated with the Taxonomy profile of the group as reflected through the main group reporting regime.

112. In addition, the ESAs consider that the additional information based on relevant KPIs provided by material subsidiaries and parent undertakings could take a simplified form as compared to the full templates. In that regard, the European Commission may choose to provide simplified templates for that purpose. The ESAs stand ready to assist the Commission in this task in case this approach is pursued.

113. The ESAs are also of the opinion that the Commission Notice⁵¹ introducing the need to compute a weighted KPI aggregating various activities carried out by groups is not meaningful and has shortcomings. The ESAs invite the European Commission to consider deleting this point.

114. More specifically, in the case of groups led by credit institutions, the weighted-KPI would overestimate the Taxonomy alignment figure at single group level in accounting for the activities related to financial conglomerates. In this case, insurance and, if applicable, non-financial activities of the group are accounted for first through the equity method as the scope of prudential consolidation and second as part of the weighted KPI through the turnover generated from the same activities. In addition to this, when subsidiaries are asset managers or investment firms, similar shortcoming may occur as they have a direct link with credit institutions' off balance-sheet AuM KPI.

115. The EBA is of the opinion that the current rules meet investors demand for information and KPIs reflecting the main or prevalent activity of the undertaking. Further aggregation of activities and KPIs would not necessarily lead to simplification but dilution of information.

Questions for public consultation

Q13. Do you agree with the analysis presented and proposed conclusions?

⁵¹ Commission Notice on the interpretation and implementation of certain legal provisions of the Disclosures Delegated Act under Article 8 of the EU Taxonomy Regulation on the reporting of Taxonomy-eligible and Taxonomy-aligned economic activities and assets (third Commission Notice) (C/2024/6691) (8.11.2024), see points 7 (related to financial conglomerates), 9 (mixed groups) and 11 (exposure to the parent undertaking of a mixed group or financial conglomerate).

- Q14. Where a single KPI is required for the parent undertaking of a group, (e.g. for the calculation of investment KPIs or the GAR arising from the exposures to the parent undertaking or investments held by financial products disclosed under the SFDR):
- i. Should the KPI disclosed by the parent undertaking, reflecting the group's main or prevalent activity, be used? If not, what alternative methodology should be applied?
 - ii. In the case of a credit institution-led group, such as a financial conglomerate, should the consolidated KPI disclosed by the parent undertaking also incorporate the assets of the insurance (and non-financial) undertaking, rather than accounting for the insurance (and non-financial) undertaking solely through the equity method? Please justify your answer in terms of feasibility, usability and transparency of sustainability information.
- Q15. Which KPIs you do think are necessary and should be required for groups with mixed activities where the credit institution is the parent company such as credit institution-led financial conglomerates, credit institution-led financial holding companies and relevant mixed financial holding companies?

7. Issue 6 (horizontal): Use of OpEx in financial KPIs⁵²

7.1. ESAs' common approach to the issue

116. The current requirements in the Disclosures Delegated Act do not explicitly envisage the use of the OpEx KPI disclosed by non-financial undertakings into the Taxonomy disclosures of financial undertakings.
117. In line with the European Commission's request, the ESAs have assessed the possible (voluntary) use of the OpEx KPIs as disclosed by non-financial undertakings into the Taxonomy disclosures of financial undertakings.
118. The ESAs investigated whether the voluntary use of OpEx in financial undertakings' disclosures may help increase the usability of the Taxonomy regime and the relevance of the OpEx KPI.

⁵² To facilitate the readers' reconciliation of the proposals on horizontal issues with the respective consultation documents of ESMA and EIOPA, the text highlighted in light green identifies the text that was developed based on common principles with the other ESAs. This text is generally aligned across the consultation documents of the ESAs, although editorial differences may exist to best fit with the writing style and structure of the respective documents.

119. The ESAs acknowledge that the question regarding the voluntary use of the OpEx KPI in financial undertakings' reporting is interrelated with the question on whether and how this KPI may be amended or redefined in a future review of the Disclosures Delegated Act.⁵³
120. The ESAs note that preliminary feedback from both users and preparers of Taxonomy information indicates that the inclusion of the OpEx KPI of non-financial undertakings in the KPIs disclosed by financial undertakings, even on a voluntary basis, would appear to add complexity and cost, with little informative value in Taxonomy reporting by financial undertakings.
121. Depending on the possible amendments to the OpEx KPI, it cannot be ruled out at this stage that financial undertakings may see merit in having the possibility of including the OpEx KPI in addition to, or as a substitute for, the turnover-based and/or CapEx-based KPIs that they currently have to disclose.
122. Pending further stakeholder feedback on the possible approaches to revising the OpEx KPI, the ESAs have nevertheless considered a possible methodology to include the OpEx KPI into the respective financial undertakings' Taxonomy disclosure requirements. This methodology would entail combining the OpEx KPI with the CapEx KPI through a weighted-average methodology.
123. There are benefits and drawbacks in using such a methodology. Relying on a weighted-average KPI could be a practical way of combining information which may appear, at first sight, rather similar, i.e. capitalised expenditures linked to sustainable activities (CapEx) and running costs associated with those activities (OpEx). However, the ESAs note that grouping together information about CapEx and OpEx would be conceptually questionable from an accounting perspective, as it would combine the value of certain assets (CapEx) which are meant to release their utility over multiple years, with a figure (OpEx) which refers to utility released in the concerned disclosure period. The weighted average figure would combine: (i) how much investment in sustainable activities has the undertaking made; and (ii) how much has the undertaking spent on sustainable activities during the current reporting period.
124. In addition, voluntary inclusion of OpEx financing in the KPIs of financial undertakings may expand the room for greenwashing risk or the greenwashing allegations against the preparers of information leading to reputational risk. Sufficient level of accompanying qualitative information would be necessary to mitigate such risks.

7.2. Analysis

7.2.1. Current requirements

125. In accordance with Annex V and Annex VII of Commission Delegated Regulation (EU) 2021/2178 credit institutions and investment firms compute and disclose financial KPIs based on turnover and CapEx KPIs associated with the underlying economic activities and assets. This

⁵³ This is a point that is addressed to and being investigated by ESMA as part of the same request by the European Commission.

approach is also applied for the computation and disclosure of the KPIs related to other financial undertakings including asset managers and insurance and reinsurance undertakings.

126. OpEx is relevant and applicable for non-financial undertakings and an OpEx-based KPI is required to be computed and disclosed by non-financial undertakings only. There are no specific disclosure requirements for financial institutions' lending and investment activities in non-financial undertakings operational expenditure.

7.2.1. Implications

127. The European Commission requested ESAs to investigate OpEx for the computation of the KPI of financial undertakings. More precisely, ESAs are invited to explore ways to allow financial undertakings to use on a voluntary basis the OpEx KPI disclosed by counterparties for computing their exposures to non-financial undertakings.
128. This could improve the usefulness of the OpEx KPI for financial markets, if a company decides to report it, by facilitating credit institutions to finance the Taxonomy-aligned working capital of non-financial undertakings. This could have the positive effect of increasing the GAR. Inclusion of OpEx-based financing can be operationalised in credit institution's KPI, i.e. GAR, as illustrated Box 5.

Box 5 Numerical illustration of incorporating OpEx in GAR

A non-financial company reported 18% of Taxonomy-aligned CapEx and 32% of Taxonomy-aligned OpEx for financial year 2024. The shaded cells for CapEx and OpEx in the table below are directly reported by the non-financial undertaking.

Under the current methodology, credit institution lending to this undertaking should use the CapEx KPI to assess its Taxonomy alignment, i.e. the loan is 18% Taxonomy-aligned. If the OpEx is included in the computation, credit institution could, on a voluntary basis, use the combined weighted average of Taxonomy-aligned CapEx and OpEx KPIs of 27%, instead of 18% for CapEx to compute its GAR. If the loan is a short-term loan for financing working capital, credit institution could, on a voluntary basis, use the 32% of OpEx instead of 18% of CapEx to compute its GAR. By using higher OpEx figures, the Taxonomy alignment ratio of the loan would increase. Such approach would not envisage an OpEx-based KPI for financial undertakings, e.g. OpEx-based GAR but allow the inclusion of OpEx-based financing explicitly in the existing CapEx-based KPI, CapEx-based GAR.

FY2024	Total (monetary amount)	Aligned (monetary amount)	Aligned (in percentage)
CapEx	3897	706	18.1%
OpEx	7472	2405	32.2%
CapEx + OpEx	11369	3111	27.4%

7.3. Preliminary advice and questions for public consultation

129. The EBA is of the opinion that, even on a voluntary basis, an explicit inclusion of non-financial undertakings' OpEx-based financing in the computation of financial undertakings' KPIs would increase complexity of the framework, create additional burden for the preparers of information with relatively small benefits for the users of information, and may also expand the room for greenwashing risk and accusations for the preparers of information.
130. Inclusion of OpEx financing in the KPIs of credit institutions and investment firms on a voluntary basis means that while some undertakings include this information in their KPIs other may decide not to. This approach would reduce comparability of information across undertakings and reduce the potential benefits for the users of the information. Indeed, if such combined approach is introduced, additional qualitative information indicating the share of OpEx financing in the final level of KPI should support the quantitative information.
131. In general, ESAs note that, depending on the amendments made to the OpEx KPI, the voluntary adoption of the OpEx KPI as part of the Taxonomy disclosures by financial undertakings may only marginally improve the information value of disclosed information while increasing the perceived complexity of the disclosure framework. The ESAs would need to assess, based on the feedback from the public consultation, whether any amendments of the OpEx KPI can otherwise provide meaningful insights into the sustainability profile of non-financial undertakings, thereby becoming of interest for investment, lending or insurance purposes.⁵⁴

Questions for public consultation

- Q16. Do you agree with the analysis presented and the conclusion that OpEx financing should not be explicitly incorporated in the methodology for calculating financial undertakings' KPIs? Please provide your rationale for supporting the explicit inclusion of provisions allowing financial undertakings, on a voluntary basis, to use the OpEx KPI disclosed by their counterparties when calculating their own KPIs.

8. Issue 7: Other issues

8.1. Disclosures of asset management activities

8.1.1. Analysis

132. In its Call for Advice the European Commission invited ESAs to propose other targeted simplifications and improvements to any general Taxonomy disclosures rules.

⁵⁴ This is a point that is addressed to and being investigated by ESMA as part of the same request by the European Commission.

133. Based on the discussion and analysis presented in section 6 (Issue 5 (horizontal): group-level reporting) and the similarities of credit institutions' asset management services and the activities of asset managers, the EBA sees the need to simplify the reporting requirements by introducing a single template for both undertakings.

8.1.1. Preliminary advice and questions for public consultation

134. The EBA is of the opinion that the European Commission should consider eliminating one of the two templates and merge the content of the templates in one single template. This would simplify the rules and provide further clarity in implementation.
135. KPI for off-balance sheet exposures under section 1.2.2 of Annex V of Disclosures Delegated Act is composed of an item reflecting financial guarantees to financial and non-financial undertakings and another item reflecting asset under management.
136. Such amendment to the asset management activities would affect the entire KPI and the design of the item on financial guarantees to financial and non-financial undertakings should be assessed.

Questions for public consultation

- Q17. Should the credit institution's AuM KPI (Annex V) and the KPI for asset managers (Annex II) be merged? Please explain why and how, including the content of the information that should be retained in a potential merged KPI.
- Q18. What are your views on the design of off-balance sheet item reflecting financial guarantees to financial and non-financial undertakings in a potential merging of the asset management activities as presented?

8.2. General consultation

137. In its Call for Advice the European Commission invited ESAs to propose other targeted simplifications and improvements to any general Taxonomy disclosures rules.

Questions for public consultation

- Q19. Do you have any additional comments or suggestions to improve, simplify or clarify the disclosure requirements within the scope of this Call for Advice, including through redrafting of instructions, and clarification of definitions, or the streamlining of terminology?

Annex I - List of questions for public consultation

Q1. Please identify your organisation (if applicable) and indicate the capacity in which you are responding to this consultation:

- a. user of sustainability information;
- b. preparer of sustainability information;
- c. both user and preparer of sustainability information;
- d. other (please specify).

Q2. Do you agree with the analysis presented?

Q3. In your view, which of the options presented in the analysis (paragraph 36) is the most viable? Please explain your rationale.

- a. removing the Fees and Commissions KPI from the Taxonomy disclosure requirements or replacing it with qualitative disclosure requirements considering 10% materiality threshold;
- b. narrowing down the scope of the KPI to following four activities identified in this analysis and adjust the disclosure requirements accordingly also introducing the 10% materiality threshold to be applied in relation to total operating income.
 - issuance or other services related to third party securities,
 - mergers and acquisition undertakings advisory services,
 - undertakings finance services related to capital market advisory for undertakings, clients or other, and
 - distribution of products issued by entities outside the prudential group to its current customers.

In your response, where applicable, please assess whether voluntary disclosure of this KPI would be meaningful and feasible, and hence should be considered.

Q4. Should additional items from FINREP Template 22.1 also be included in the revised KPI? Please consider in particular that (i) have been assessed as unrelated to capital market activities, e.g. 'custody and other related services', and (ii) those that have not been mapped to the Fees and Commissions KPI, such as 'structured finance', 'loans granted', 'commodities'.

Q5. Do you have evidence and/or arguments on potential costs and benefits associated with disclosing the Fees and Commissions KPI?

Q6. Do you agree with the analysis presented?

Q7. In your view, which of the options presented in the analysis (paragraph 68) is the most viable? Please explain your rationale.

- a. removing the Trading Book KPI or replacing it with qualitative disclosure requirements on the trading portfolio also considering the materiality threshold;
- b. narrowing down the scope of the KPI to providing market liquidity through market making, with a clear focus on providing liquid markets for green (Taxonomy-aligned) securities.

In your response, where applicable, please assess whether voluntary disclosure of this KPI would be meaningful and feasible, and hence should be considered.

Q8. Do you have evidence and/or arguments on potential costs and benefits associated with disclosing the Trading Book KPI?

Q9. Do you agree with the analysis presented and the conclusion to narrow down the investment firms' KPI?

Q10. Do you agree with limiting the KPI to the following four elements for the purpose of Taxonomy disclosures?

- Portfolio management;
- Investment advice;
- Underwriting of financial instruments and/or placing of financial instruments on a firm commitment basis; and
- Placing of financial instruments without a firm commitment basis.

Please explain if you think that other services, e.g. execution of orders on behalf of clients, should be included in the revised KPI.

Q11. Do you consider it more appropriate for the KPI to reflect the value of assets under management covered by the investment services rather than the monetary benefits generated?

Q12. Do you agree with the analysis presented and the conclusion to align the grandfathering rules with the approach set out in EU Green Bond Regulation?

Q13. Do you agree with the analysis presented and proposed conclusions?

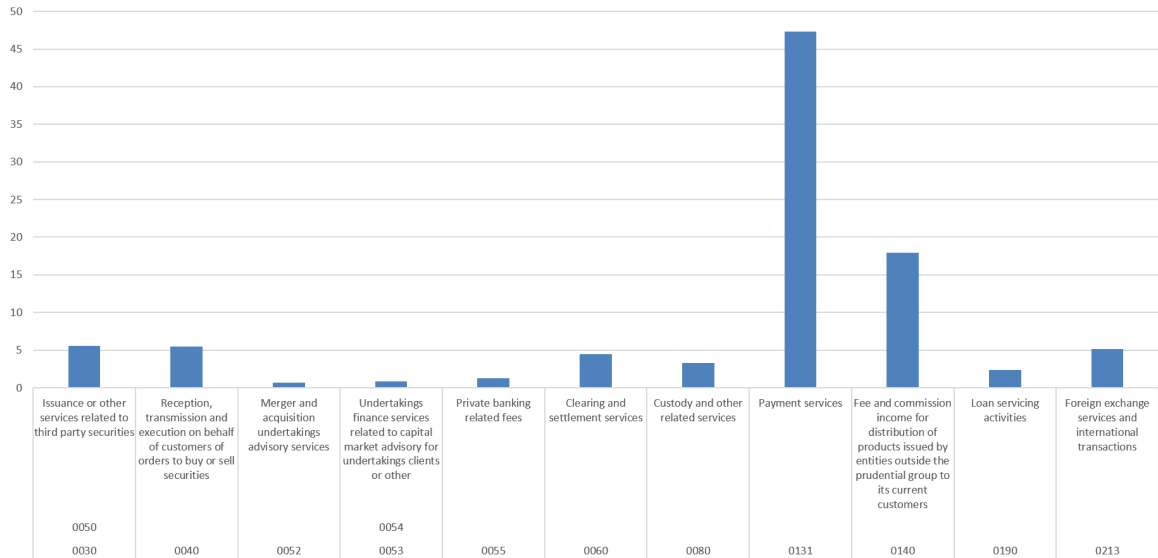
Q14. Where a single KPI is required for the parent undertaking of a group, (e.g. for the calculation of investment KPIs or the GAR arising from the exposures to the parent undertaking or investments held by financial products disclosed under the SFDR):

- i. Should the KPI disclosed by the parent undertaking, reflecting the group's main or prevalent activity, be used? If not, what alternative methodology should be applied?
- ii. In the case of a credit institution-led group, such as a financial conglomerate, should the consolidated KPI disclosed by the parent undertaking also incorporate the assets of the insurance (and non-financial) undertaking, rather than accounting for the insurance (and non-financial) undertaking solely through the equity method? Please justify your answer in terms of feasibility, usability and transparency of sustainability information.

- Q15. Which KPIs you do think are necessary and should be required for groups with mixed activities where the credit institution is the parent company such as credit institution-led financial conglomerates, credit institution-led financial holding companies and relevant mixed financial holding companies?
- Q16. Do you agree with the analysis presented and the conclusion that OpEx financing should not be explicitly incorporated in the methodology for calculating financial undertakings' KPIs? Please provide your rationale for supporting the explicit inclusion of provisions allowing financial undertakings, on a voluntary basis, to use the OpEx KPI disclosed by their counterparties when calculating their own KPIs.
- Q17. Should the credit institution's AuM KPI (Annex V) and the KPI for asset managers (Annex II) be merged? Please explain why and how, including the content of the information that should be retained in a potential merged KPI.
- Q18. What are your views on the design of off-balance sheet item reflecting financial guarantees to financial and non-financial undertakings in a potential merging of the asset management activities as presented?
- Q19. Do you have any additional comments or suggestions to improve, simplify or clarify the disclosure requirements within the scope of this Call for Advice, including through redrafting of instructions, and clarification of definitions, or the streamlining of terminology?

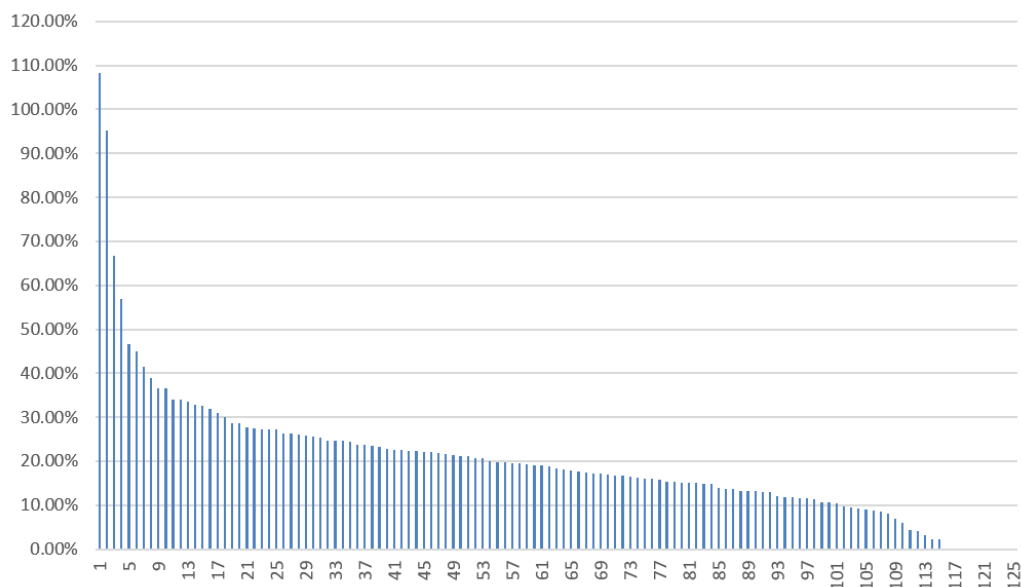
Annex II - Statistics

Figure 1: Composition of the fees and commissions income (in bn EUR)



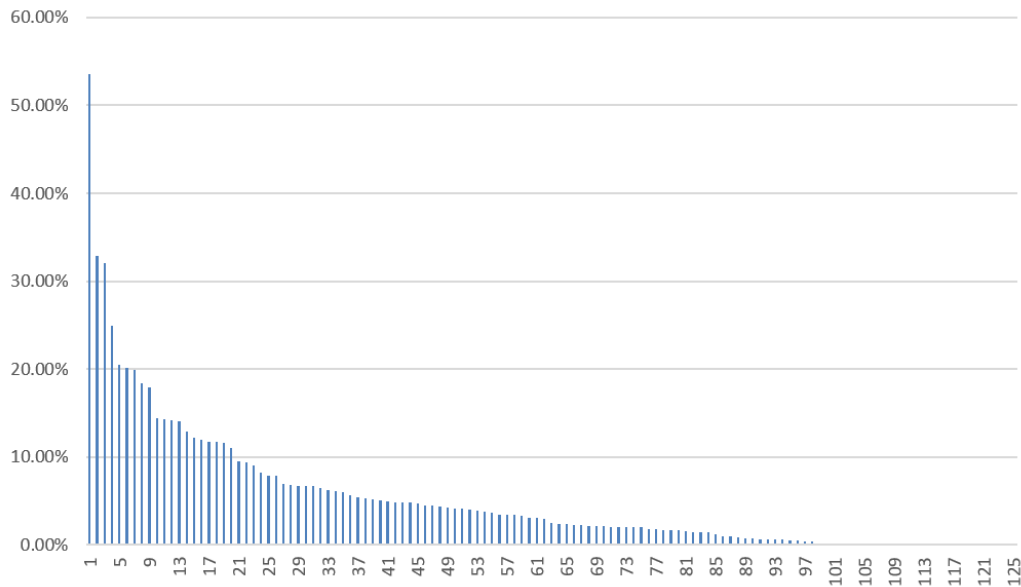
Notes and source: i) 125 institutions as of September 2025 reference date; ii) FINREP data, EBA calculations and Bloomberg list to identify credit institutions subject to CSRD (post-Omnibus criteria apply – Bloomberg methodology is under development and not final at the time of drafting); iii) numbers on the x-axis refer to the FINREP template 22.1 datapoint coordinates

Figure 2: Credit institutions' all fees and commissions income covered in the KPI (status quo) as share of total operating income



Notes and source: i) fees and commissions cover all services included in the KPI; ii) 125 institutions as of September 2025 reference date; iii) FINREP data, EBA calculations and Bloomberg list to identify credit institutions subject to CSRD (post-Omnibus criteria apply – Bloomberg methodology is under development and not final at the time of drafting)

Figure 3: Credit institutions' selected fees and commissions income as share of total operating income



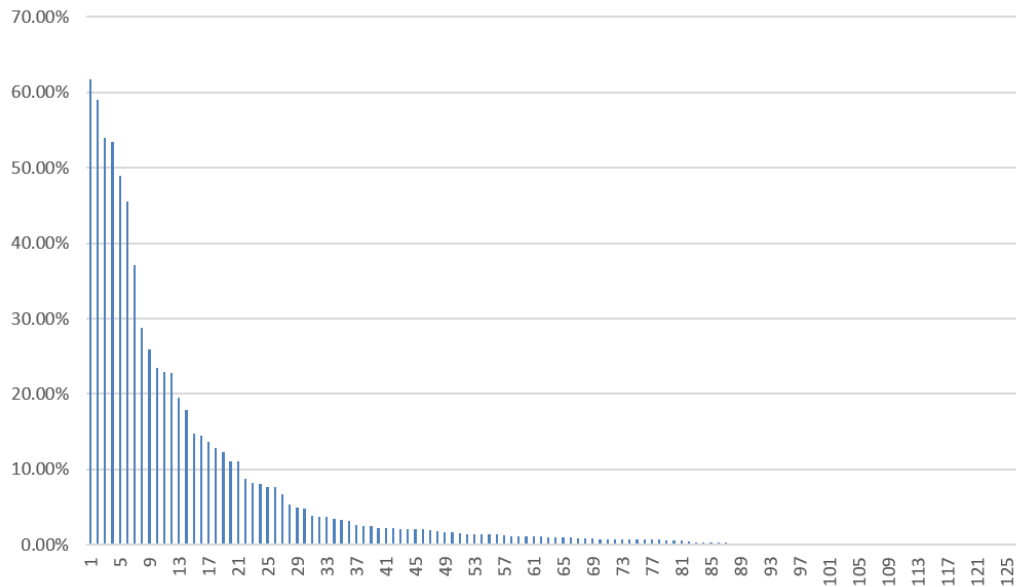
Notes and source: i) fees and commissions cover selected four services as presented in the analysis; ii) 125 institutions as of September 2025 reference date; iii) FINREP data, EBA calculations and Bloomberg list to identify credit institutions subject to CSRD (post-Omnibus criteria apply – Bloomberg methodology is under development and not final at the time of drafting)

Figure 4: Composition of credit institutions' trading book (aggregate)

	Absolute amount	Relative to total trading assets
Financial assets trading (total)	2,900,308,432,022	
Derivatives	1,053,669,035,520	36%
Equity instruments	417,113,302,072	14%
Debt securities	713,955,377,135	25%
Loans and advances	715,570,716,294	25%
Total assets	22,705,858,699,710	
Financial liabilities trading (total)	2,115,395,778,228	
Derivatives	996,574,723,431	47%
Short positions	304,103,264,393	14%
Deposits	713,075,100,140	34%
Debt securities issued	59,476,822,215	3%
Other financial liabilities	42,165,868,046	2%
Total liabilities + Equity	22,705,858,699,710	
Total trading book	5,015,704,210,250	22%

Notes and source: i) 125 institutions as of September 2025 reference date; ii) FINREP data, EBA calculations and Bloomberg list to identify credit institutions subject to CSRD (post-Omnibus criteria apply – Bloomberg methodology is under development and not final at the time of drafting)

Figure 5: Size of credit institutions' trading book as a share over total assets



Notes and source: i) 125 institutions as of September 2025 reference date; ii) FINREP data, EBA calculations and Bloomberg list to identify credit institutions subject to CSRD (post-Omnibus criteria apply – Bloomberg methodology is under development and not final at the time of drafting)

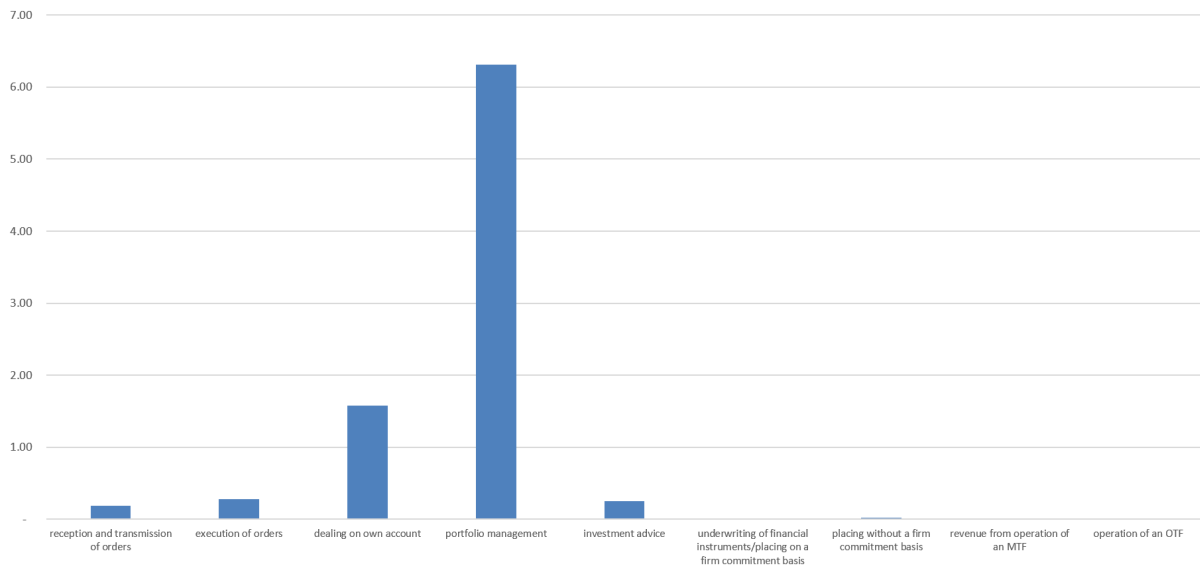
Table 5: Number of credit institutions subject to CSRD requirements and above the materiality thresholds

Country	Number of institutions subject to CSRD requirements	of which: Above threshold in Article 325	of which: Above threshold in Article 94	of which: Above any of the two thresholds
AT	11	1	1	0
BE	4	1	2	1
BG	2	0	0	0
CY	2	0	0	0
CZ	5	2	1	1
DE	58	8	6	6
DK	9	8	9	8
EE	1	0	0	0
ES	15	2	2	2
FI	6	1	1	1
FR	7	4	4	4
GR	5	1	2	1
HR	3	0	0	0
HU	2	0	0	0
IE	5	2	2	2
IS	3	0	0	0
IT	22	5	4	3
LI	1	0	0	0
LT	1	0	0	0
LU	3	0	0	0
LV	2	0	0	0
MT	4	0	0	0
NL	9	3	1	1
NO	1	0	0	0

PL	12	1	2	1
PT	4	0	1	0
RO	4	0	0	0
SE	9	2	1	1
SI	2	0	0	0
SK	4	0	0	0
Total EU	189	37	35	30

Notes and source: i) 189 institutions as of September 2025 reference date; ii) COREP data, EBA calculations and Bloomberg list to identify credit institutions subject to CSRD (post-Omnibus criteria apply - methodology is under development and not final at the time of drafting)

Figure 6: Composition of revenues for investment firms (in bn EUR)



Notes and source: 141 investment firms supervisory reporting data as of September 2025 reference date

Annex III – Credit institution-led group disclosures

Table 6 Overview of Taxonomy disclosures

Undertaking	Case explanation		Annex - respective templates in the Disclosures Delegated Regulation (EU) 2021/2178						
			Non-financial undertakings	Asset managers (AM)	Credit institutions (CI)		Investment firms (IF)	Insurance and reinsurance undertakings	
			Annex II	Annex IV	Annex V		Annex VIII	Annex IX	
					GAR	AuM (Off-BS KPI)			
CI	CI with no other financial or non-financial activities	CI is the only entity hence subject to disclosure templates for CI only.			x	x			
CI with IF activities	CI conducts IF activities but not under a separate entity of the group	CI is the only entity hence subject to disclosure templates for CI only. This may be common given the fact that a large number of large investment firms are also licensed as credit institutions.			x	x	x		
CI (parent) with IF activities conducted by an entity (subsidiary) that is part of the group	CI as a group conducts IF activities under a separate entity that is part of the group	CI would control the IF (subsidiary). Hence, GAR will present the main KPI. In addition to this, KPI for IF will be published.			x	x	x (subsidiary*)		
CI (parent) with insurance activities that is an entity in the group (e.g. financial conglomerate)	CI-led financial conglomerate with insurance activities under a separate entity in the group	CI would have (equity) participation in the insurance entity. Hence, GAR will be the main / consolidated KPI with participation in the insurance undertaking appearing in the equity instruments.			x	x			x (subsidiary**)

CI with AM activities	CI conducts AM activities but not under a separate entity of the group	CI is the only entity hence subject to disclosure templates for CI only.			x	x		
CI (parent) with AM activities	CI (parent) as a group conducts AM activities under a separate entity (sub) that is part of the group	CI would control the AM entity. Hence, GAR will present the main KPI. In addition to this, the AM entity will publish at subsidiary level the relevant AM template.		x (subsidiary*)	x	x		
CI (parent) with non-financial activities	CI (parent) with non-financial entity as part of the group	CI controls the non-financial undertaking. This could be integrated through the equity method or accounting method depending on the activity to banking. CI is subject to disclosure templates for CI only.			x	x		

* Information/KPI provided by the subsidiary and disclosed in the group consolidated report.

** Subsidiary-level KPI is not part of the group consolidated report.