

Regulation and Supervision



Context

ECB Banking Supervision has revised its strategic priorities for the next three years (2025-2027) to reflect the most structural challenges and vulnerabilities of the sector



geopolitical uncertainty

Structural challenges:

In 2024, GDP growth in the eurozone has started to recover gradually amid a moderation of inflationary pressures. Growth prospects for 2025 are positive, although they remain subject to certain risks, particularly geopolitical uncertainty (Ukraine, the Middle East), which could threaten the continuity of medium-term GDP recovery with controlled



climate and digitalisation

The structural challenges arising from the climate transition and digital transformation have a direct impact on the banking sector.

Material exposure to climate risks can jeopardise the transition to a net zero economy and lead to an increase in physical risks.

Digital transformation requires strengthening risk practices in an environment of increased competition non-bank financial from institutions.



Risk appetite and pricing

The increased risk appetite, lower risk premia and reduced volatility that have prevailed in markets during 2024 could lead to abrupt changes in market sentiment.

This could lead to significant falls in asset prices in 2025 due to unexpected events.

inflation.

Priorities and vulnerabilities

The ECB has set its supervisory priorities for 2025-2027 by considering the vulnerabilities of the banking sector to each of them

Priority 1

Strengthening resilience to macrofinancial threats and severe geopolitical shocks

Address weaknesses in credit risk management frameworks, detect early deterioration in asset quality and maintain adequate levels of provisioning

Evolving operational resilience frameworks in an environment of increasing geopolitical risks, in particular considering cyber risks



Credit Risk

Operational Resilience and Cyber Risk

Priority 2

Effective and timely treatment of persistent material deficiencies

Addressing gaps related to climate risk strategy and management



ESG Risks

Enhance capacities to improve data aggregation and risk reporting (RDARR)



Data Risk (RDARR)

Priority 3

Strengthening digitisation strategies and meeting the challenges of using new technologies

Addressing the challenges in the field of digital transformation and the use of new technologies, in particular the use of Al and Cloud Services



Business Model (BMA)

Vulnerabilities and actions required

Supervisory work programme

For each vulnerability, the ECB has set specific strategic objectives and developed work programmes to mitigate the underlying risks

Priority 1

Priority 2

Priority 3

Special attention to the cross-cutting consideration of **geopolitical risks** in the supervisory framework.

Credit risk



ESG risks



Business Model (BMA)



- Follow-up of IFRS 9 TRs, with a focus on forcing and incorporation of new risks, in particular ESG and geopolitical risks.
- Continuation of the credit risk OSIs, with a focus on collective staging and provisions for the corporate, SME, retail and commercial real estate portfolios, as well as collateral valuation.
- TR of SMEs with a focus on early follow up (EWIs), modelling and governance.

Operational resilience and cyber risk



- Data collection from ICT providers to identify relationships with supervised entities, potential concentration risks and weaknesses in contracts.
- TR of Vendor Risk Management (VRM) and Cyber Risk management and control frameworks.
- Follow-up of findings from the Cyber Stress Test 24.
- Operational Risk OSIs and IT resilience frameworks.
- Implementation of DORA.

LOGITORS

- Monitoring of full alignment with supervisory expectations.
- · Assessment of compliance with Pillar 3 ESG.
- Evaluation of the capacity to assess the associated reputational and legal risks.
- Review of entities' transition plans in line with CRD6 requirements.
- ESG OSIs, standalone or within the framework of other risk reviews (credit, operational or business)

Data Risk (RDARR)

- Follow-up of RDARR TRs, reviewing compliance with the supervisory expectations of the RDARR Guidance and remediation of findings.
- Data governance OSIs, IT infrastructure, risk data aggregation and reporting capabilities.
- Governance and data quality management report, annual questionnaire to ensure management's accountability for internal, financial and supervisory reporting.

- Specific activities focused on the impact of digital transformation on business models and strategies and on the risks arising from the
- and cloud services).
 OSIs Digital Transformation, examining the impact of technology-related aspects and new business models on organisations' strategies.

use of new technologies (in particular use of Al



Why Management Solutions?

Management Solutions has in-depth knowledge of financial regulation and extensive experience in supporting ISOs through different types of collaboration

REGULATORY EXPERTS

MS has a

Regulatory Observatory that provides in-depth knowledge of the regulatory requirements of financial and non-financial institutions at European level

Functional profiles

MS PROFILES

Data scientists (processing and modelling)

Technical profiles

POSSIBLE TYPES OF COLLABORATION



PMO SUPPORT

- Stakeholder coordination
- Development and monitoring of the OSI work plan
- Preparation of meetings with the supervisor



SUPPORT

- Support in the preparation of the documentation associated with each area
- Support for the necessary qualitative and quantitative analyses
- Support in the production of Loan Tapes



IMPROVEMENT OF DOCUMENTATION

- Support to quality control to update and improve existing documentation
- Gathering and challenging evidence



SUPPORT FOR THE PLANS REMEDIATION

- Support in identifying and executing remediation plans
- PMO support in monitoring plan execution



Abbreviations

BMA	Business model assessment
CRD	Capital Requirements Directive
ECB	European Central Bank
ESG	Environmental, social and governance
DORA	Digital Operational Resilience Regulation
IFRS	International Financial Reporting Standard
ICT	Information and Communication Technologies
IT	Information technology
SMES	Small and medium-sized enterprises
GDP	Gross Domestic Product
РМО	Project Management Office
RDARR	Risk aggregation and reporting
OSIs	On-site inspections
TR	Targeted Review



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