

Reporting of financial standing and risks of supervised entities

Webinar 8 October 2025

Event programme

- Opening of the event
- Update on the Reporting System
- Future changes to credit institution reporting
- Future changes to insurance company reporting
- Changes to data collection on risks and controls related to money laundering and terrorist financing and sanctions (RA)
- Reporting in accordance with the Instant Payments Regulation (IPR)
- Questions and discussion

Update on the Reporting System

Update on the Reporting System

- The FIN-FSA's Reporting of financial standing and risks has been successfully transferred in its entirety to the Reporting Portal
- The reform of the Reporting System has concerned electronic, formal and regular reporting of financial standing and risks to the FIN-FSA
 - EBA ITS data collections (22)
 - EIOPA ITS data collections (10)
 - ESMA data collections (4)
 - National data collections (33)
- Identification and authorisation of Finnish and foreign reporters takes place via the Suomi.fi service
- The Reporter Portal is available for reporters' use
 - Up-to-date reporting obligation information is viewable
 - Submission of reports
 - Reporting-related communication

Report submission and feedback

- Reports can be submitted in three different ways
 - By uploading a report file (XBRL/XML/CSV) to the system
 - By submitting a report file directly from the reporter's own system via an SFTP connection (Application to Application, A2A)
 - By completing web forms (recommended to be used only for a small number of forms)
 - No web forms are planned for CSDR7, CSDR9 and MMF data collections
- Each reporter sees in the Reporter Portal
 - The report processing status
 - Feedback on the report
 - Feedback on a report submitted via an SFTP connection also comes directly to the reporter's own reporting system
- Reporters may submit reports to the Validation service for checking before submitting an official report to the FIN-FSA
 - The reports are not used for supervisory purposes

Email reception for the outgoing reporting system will end in December 2025

- Only correction reports will be reported to the outgoing reporting system.
- Email reception for the outgoing reporting system will end in December 2025
- From 2026 onwards, correction reports for the outgoing reporting system will be submitted as an attachment file via the Reporting Portal's Communications function.
- Any workbook needs for reporters' outgoing reporting system correction reports will be submitted on request from the FIN-FSA to reporters via the Reporter Portal's Communications function or secure email.

Deficiencies in reporting obligations for reference date 31 March 2025

- There are deficiencies in the reporting obligations of the FIN-FSA's reporting obligations for reference date 31 March 2025 and we published a release on this issue on 7 April 2025
 - [Up-to-date information on the Reporter Portal and Validation Service: | EBA, EIOPA, ESMA, National reporting](#)
- Reporting obligations for data collections were published in the Validation Service and Reporter Portal on 25 April 2025
 - [Data collections ready for normal reporting in Validation Service and Reporter Portal – reporting reference date 31 March 2025 | EBA EIOPA ESMA National reporting \(Virati\)](#)
- We have reviewed the events with our system supplier and have prepared an action plan to avoid similar situations.
- The FIN-FSA will not initiate supervisory actions for reporting delays potentially caused by technical issues affecting the Reporting System.

User survey on the operation of the Reporter Portal

- The FIN-FSA has sent a user survey on the operation of the Reporter Portal.
 - [Survey of the functioning of the Reporter Portal | EBA EIOPA ESMA National reporting \(Virati\)](#)
 - The survey was open for responses from 2 September to 19 September 2025, and we thank everyone who responded.
- The FIN-FSA evaluates its own operations and the achievement of its objectives in different areas and strives to develop its operations and the Reporting System based on feedback received.
- The survey was conducted in cooperation with the Bank of Finland.
- We will publish a reporting release on the results of the user survey and on further actions taken based on the feedback during the latter part of the year.

User survey on the operation of the Reporter Portal

- Respondents to the survey gave the Reporting System an overall rating of 2.9, while the system's ease of use received a rating of 2.6.
 - The rating scale was from 1 to 5 (1=Very poor, 2=Poor, 3=Neither bad nor good, 4=Good, 5=Very good).
- Three areas where respondents consider there is most room for improvement:
 - Reporting form use
 - Feedback reports
 - Tracking of reporting
- Respondents to the survey have been satisfied with the support and quick response received from experts, although there is still room for improvement in the system's user interface and functionality.
 - The question “I have received sufficient support in situations related to the use of the Reporter Portal” received an average rating of 3.4.

Information about the Reporting System and reporting obligations

- Information about the Reporting System can be found at the FIN-FSA's [website](#).
- Reporting obligations by data collection - [financial sector](#) and [insurance sector](#) data collection charts (in Finnish)
- Please use the FIN-FSA's Reporter Portal for contacts, where possible
- Questions and feedback NewReportingSystem@finanssivalvonta.fi

Future changes to credit institution reporting

Future changes to credit institution reporting

- [EBA reporting framework 4.2](#) will be phased in from 12/2025
 - Draft published in September, final version expected in November ([Reporting release 16 September 2025](#))
 - Reporting in accordance with the Instant Payments Regulation (IPR): New reporting requirements in accordance with the SEPA Regulation regarding charges for credit transfers and the share of rejected payments. Due to technical corrections, the reporting has been postponed and incorporated into version 4.2 of the reporting framework
 - Reporting requirements under CRR3/CRD6 regarding own funds requirements for operational risk
 - Changes to reporting on resolution planning and MREL decisions
 - Some changes to forms for Supervisory Benchmarking for Market Risk (SBP)

Migration to use of xBRL-CSV in EBA ITS reporting

- xBRL-CSV will replace the XBRL-XML format in EBA ITS reporting
- Technical change, affecting reporters who produce EBA ITS report files themselves
 - Reporter Portal's form templates will work as before
- The FIN-FSA will migrate to using xBRL-CSV in EBA ITS reporting according to the EBA 4.2 schedule
 - The aim is to open the Validation Service to reporters in a timely manner
- EBA technical documentation for version 4.0 includes specifications for producing xBRL-CSV reports

Future changes to credit institution reporting

- [EBA reporting framework 4.3](#) will be phased in from 12/2026
 - COREP OF (Step 2)-> Changes required by the CRR3/CRD6 regulatory package, for example to reporting of losses arising from lending secured by real estate (IP), shadow banking and transitional arrangements. Reporting from 12/2026.
 - FINREP -> Implementation of IFRS 18, the needs for Supervisory Authorities' risk assessment, the simplification of reporting and the goal of reducing the reporting burden have been taken into account in the proposed amendments. Reporting from 3/2027.
 - Liquidity (ALMM & AE) -> Changes to support liquidity analysis, aimed at replacing established ad-hoc reporting with harmonised requirements, simplification of reporting, and proportionality have been taken into account in the proposed amendments. Reporting from 3/2027.

- Mandate for simplification of reporting postponed the start of ESG reporting
- Future ESG reporting will be largely based on the Pillar 3 tables consulted on in summer 2025.
- According to preliminary information, a consultation paper on ESG reporting will be published during 2025

Simplification – simplifying the regulatory framework and reporting requirements

- The EBA has published a [report](#), which includes recommendations to enhance the efficiency and streamline the EU's regulatory and supervisory framework. The recommendations are divided into shorter-term and longer-term recommendations.
- Regulatory framework
 - EBA will review both existing and future L2 and L3 regulatory mandates according to a new methodology (appropriateness, materiality)
 - Development of a more user-friendly Single Rulebook to start in 2026
- Reporting (with the aim of reducing the reporting burden and costs)
 - Reducing reporting – reviewing existing reporting requirements, taking into account proportionality
 - Reporting change management – providing more predictability to future reporting changes and deeper engagement with stakeholders
 - A common EU-wide data repository – better aligning EU and national reporting requirements and increasing transparency
 - Closer coordination between authorities regarding new reporting requirements – minimising overlaps in requirements
 - Longer-term objective of a common reporting framework across sectors (Integrated Reporting)
- Work will be carried out in coordination with the ECB/SSM

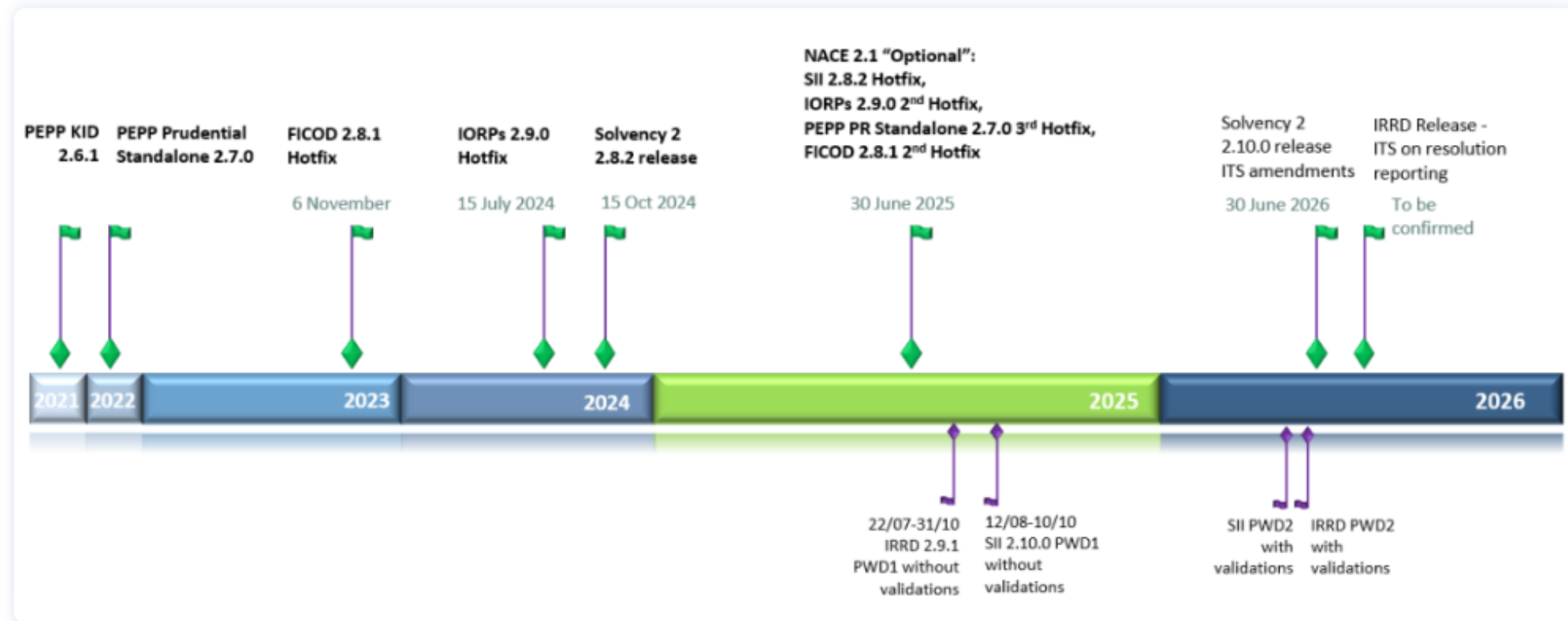
Reporting of default risks (MK)

- Legislation on the management of default risks in the granting of consumer credit entered into force on 1 July 2023 (Credit Institutions Act, chapter 15, section 11b and Act on the Registration of Certain Credit Providers and Credit Intermediaries, section 13). In the same context, supervision of certain creditor providers and credit intermediaries was transferred to the FIN-FSA.
- The FIN-FSA as prepared regulations and guidelines aimed at guiding supervised entities on the management of default risks in the granting of consumer credit.
 - Management of default risks in the granting of consumer credit is monitored using default risk reporting data (MK report)
- The regulations and guidelines also include an obligation to provide information to the FIN-FSA by means of a default risk management report.
- The first reference date is 31 December 2025, with the first data submission due by mid-February 2026
- [Supervision release](#) 26 May2025 – 35/2025

Future changes to insurance company reporting

EIOPA taxonomy publications

Taxonomy releases



Source: European Insurance and Occupational Pensions Authority (EIOPA)

Future changes to insurance company reporting

- In June, EIOPA released the “*optional*” 2.8.2 Hotfix for all reporting frameworks (SII, IORPs, PEPP Prudential, FICOD), which allows reporting of NACE codes according to the NACE 2.1. classification in addition to the NACE 2.0 codes
- In July, EIOPA also published the first public working draft of the IRRD data point model (taxonomy version 2.9.1.) and feedback can be given until 31 October 2025.
- More information on Hotfix 2.8.2. and IRRD can be found at [Supervisory reporting - DPM and XBRL – EIOPA](#). In addition, more information about the NACE 2.1. codes can be found at Q&A [2931 - NACE 2.1 – EIOPA](#)

Future changes to insurance company reporting

- EIOPA has launched consultations on Solvency II reporting changes for non-life and life insurance companies, with the aim of reducing the reporting burden
- The review of reporting requirements was initially triggered by the amendments to the Solvency II Directive. At the same time, the review provided an opportunity to contribute to the European Commission's initiative to improve the competitiveness of European businesses by reducing the reporting burden by at least 25% across all sectors.
- Stakeholders can provide comments to EIOPA via the [EU Survey](#) by 10 October 2025. All responses will be published on EIOPA's website, unless otherwise requested.

Future changes to insurance company reporting

- Upcoming changes for KEVA to Income statement and balance sheet tables (VA) for data collection and Financial statement notes tables (VB) for data collection
 - New tables: VA01h, VA02h, VA03h and VB02h, VB03h VB032h
 - New validation rules
- Income statement, balance sheet unemployment funds, number of fund members (KB) data collection
 - New rows, columns and validation rules
- Tables of data collections to be reported and instructions for completing them:
 - [Submission to the FIN-FSA of electronic supervisory data of entities operating in the insurance markets - www.finanssivalvonta.fi](http://www.finanssivalvonta.fi)

Reporting on risks and controls of money laundering and terrorist financing (RA)

Reporting on risks and controls of money laundering and terrorist financing (RA) 1(2)

- Updated form templates and response instructions can be found on the FIN-FSA's website: [Reporting – Prevention of money laundering and terrorist financing – www.finanssivalvonta.fi](https://www.finanssivalvonta.fi)
- Changes in brief:
 - Questions regarding correspondent relationships expanded and wording refined (questions 690-695) - the questions concern credit institutions, payment service providers and crypto-asset service providers (CASPs).
 - Minor changes
 - Terminology update: virtual currency -> crypto-assets
 - Notifications on free provision: question and instructions modified so that only countries to which services are actually provided should be reported (question 60)
 - Questions on human resources (751 and 2305): Instead of the number of persons, the question concerns the person-years assigned to the tasks in question.
 - Sanction alerts: two new questions on the extent to which situations have been observed where suspicion has arisen of a breach of the sanctions regulations or freezing orders.

Reporting on risks and controls of money laundering and terrorist financing (RA) 2(2)

- Reporting on risks and controls of money laundering and terrorist financing will change in the coming years due to the transnational reporting obligation.
- An expert group assembled by the EBA has prepared a draft Regulatory Technical Standards package on reporting and this draft was circulated for consultation in spring 2025
 - *Draft RTS on the assessment of the inherent and residual risk profile of obliged entities* -> a list of proposed data points at the end of the call for advice
 - [Regulatory Technical Standards package on compliance of institutions and supervisors with their AML/CFT obligations | European Banking Authority](#)
- The draft, modified based on advice, will be discussed at the EBA during the autumn – no exact timetable yet (16 September 2025)

Reporting in accordance with the Instant Payments Regulation (IPR)

General information on the Instant Payments Regulation

- Payment service providers, such as banks, that provide regular credit transfers in euros **will be obliged to provide services for sending and receiving instant credit transfers.**
 - **No higher fee may be charged for these services than for regular credit transfers.**
- Thanks to the IPR, money will be transferred from one account to another **within 10 seconds**, at any time of day, even outside normal working hours (**24/7/365**) and **to another EU country.**
- Instant payment service providers must check that the **payee's IBAN account number and name match**, so that the payer can be warned of possible errors or fraud before the payment transaction is executed.
 - This requirement applies to both instant credit transfers and other regular credit transfers.
- Payment service users **must be able to set an individual limit fixing a maximum amount, either on a daily or transaction basis, that they can send by means of instant credit transfer.**
 - Payment service users must be able to modify or remove these individual limits at any time, without difficulty and with immediate effect.
 - **Payment institutions and electronic money issuers may participate in the national settlement systems** of the Member States

What does the reporting concern and why is the information collected?

- The purpose of the reporting is to support the **European Commission in assessing the impact of the SEPA Instant Payments Regulation (IPR)** and to help ensure that consumers benefit from instant payments and that they are not more expensive than regular credit transfers. (Article 15(3) of the SEPA Regulation)
- Payment service providers must notify the competent authorities:
 - a) the level of **charges** for credit transfers, instant credit transfers and payment accounts;
The **charges** applied by a payment service provider on payers and payees **for sending and receiving instant credit transfers must not be higher** than the charges that the said payment service provider applies for sending and receiving other similar types of credit transfers.
 - b) **the share of rejections**, separately for national and cross-border instant credit transfers, **due to the application of targeted financial restrictive measures**.

To whom does the report apply?

Instant credit transfer schedule for payment service providers:

- The Regulation sets transitional periods for the introduction of instant credit transfers. As a general rule, payment service providers must offer a service for receiving instant credit transfers in euro by 9 January 2025 and a service for sending instant credit transfers in euro by 9 October 2025.
- Authorised payment institutions and electronic money institutions, on the other hand, that provide SEPA credit transfer services to their payment service users must offer a sending and receiving service by 9 April 2027.
- Authorised payment institutions and electronic money institutions can also offer instant credit transfer services, but no specific deadlines are set regarding them.

The reporting obligation applies to all payment service providers (PSP):

- Domestic credit institutions
- Domestic payment institutions
- Domestic electronic money institutions
- Domestic registered entities, i.e. legal persons and natural persons providing a payment service without authorisation
- Branches of foreign credit institutions offering payment services in Finland
- Branches of foreign payment institutions providing payment services in Finland
- Branches of domestic payment and credit institutions operating in other EU countries must submit the information to the competent authority of the country in which they are located.

When and how does reporting start?

- The first report must be submitted on **9 April 2026** and must include information on the level of charges and on rejections **during the period starting on 26 October 2022 until the end of preceding calendar year (2025)**.
 - The first report shall include summaries for the periods from 26 October 2022 to 31 December 2022 and for the following calendar years (1 January 2023 to 31 December 2023, etc.)
 - Subsequent submissions, due annually by 9 April, shall include only the previous year's summaries.
- Payment service providers must submit reports **every 12 months**.
- Reports must be submitted **using the FIN-FSA's Reporter Portal**.
- At the latest by **9 October 2026**, and annually thereafter, **competent authorities** must submit to the Commission and the European Banking Authority (EBA) the reports submitted by payment service providers.

General instructions for reporting

- According to Article 15 of the SEPA Regulation, **payment service providers (PSPs) in euro area Member States are only required to report credit transfers and instant credit transfers in euro**, and other currencies shall be excluded from the report. **Article 15 of the SEPA Regulation lays down that national and cross-border credit transfers and instant credit transfers in euro** and in the national currencies of Member States whose currency is not the euro **must be reported**.
- **Charges for transfers in euros must always be expressed in euros, even if they have been applied in another currency.**
- Data that are not necessary or applicable should not be included in the submission;
 - (b) Numerical values must be provided as follows:
 - i. data of data type '**Monetary value**' must be reported with a precision of at least **thousands of units**
 - ii. data of the data type '**Integer**' **must not use decimals** and must be reported with a precision of units.

Report 1: Number and total value of SEPA credit transfers and SEPA instant credit transfers (euro)

- Payment service providers (PSPs) must report **to the competent authorities information on the number and value of credit transfers executed**, including instant credit transfers, broken down as follows:
 - a) different payment initiation channels**
 - executed digitally using online banking
 - executed digitally using mobile banking
 - This category also includes digital wallets and other mobile payment solutions used to initiate A2A (account to account) and/or C2B (consumer to business) payments.
 - executed manually (branch)
 - b) domestic and cross-border credit transfers (to EU countries)**
 - c) free and paid credit transfers (charges)**
 - d) different types of payment service users (PSUs), such as consumers and non-consumers**
 - Non-consumers: such as natural persons acting for commercial or professional purposes or legal persons.
- The sum of the data reported in items b, c and d must correspond to the total number or value of the reported credit transfers.
- This is not the case with item a, as digitally executed credit transfers (which include additional items) and credit transfers in “paper form” are complementary. In addition, there are also transfers in the “other” category that are not reported separately under this implementing technical standard.
- Digitally executed credit transfers also include “file/batch executed” credit transfers. Each transfer in a batch is counted as a separate transaction in reporting.

Report 1: Number and total value of SEPA credit transfers and SEPA instant credit transfers (euro)

			Credit transfers sent				Credit transfers received			
			Number of credit transfers		Value of credit transfers		Number of credit transfers		Value of credit transfers	
				of which instant credit transfers		of which instant credit transfers		of which instant credit transfers		of which instant credit transfers
			0010	0020	0030	0040	0050	0060	0070	0080
Total		0010								
of which executed digitally using online banking		0020								
of which executed digitally using mobile banking		0030								
of which executed in paper form (branch or corresponding manual method)		0040								
Breakdown of the location of payments	Domestic	0050								
	Cross-border (Member States)	0060								
Breakdown of charges	No charges (free)	0070								
	Charges (paid)	0080								
Breakdown of payment service users	Non-consumer users of payment service	0090								
	Consumers	0100								

Report 2: SEPA credit transfer and SEPA instant credit transfer charges (euro)

- Reporting must include **information on the charges levied by payment service providers on payment service users for credit transfers and instant credit transfers** sent with regard to payment service providers located in euro area Member States and payment service providers located in non-euro area Member States, broken down as follows:
 - a) **different payment initiation channels**
 - executed digitally using online banking
 - executed digitally using mobile banking
 - This category also includes digital wallets and other mobile payment solutions used to initiate A2A (account to account) and/or C2B (consumer to business) payments
 - executed manually (branch)
 - b) **domestic and cross-border credit transfers (to EU countries)**
 - c) **different types of payment service users (PSUs), such as consumers and non-consumers**
 - Non-consumers: such as natural persons acting for commercial or professional purposes or legal persons.

Report 2: SEPA credit transfer and SEPA instant credit transfer charges (euro)

			Credit transfers sent		Credit transfers received	
			Value of credit transfer charges		Value of credit transfer charges	
				of which instant credit transfers		of which instant credit transfers
			0010	0020	0030	0040
Total		0010				
of which executed digitally using mobile banking		0020				
of which executed digitally using mobile banking		0030				
of which executed in paper form (branch or corresponding manual method)		0040				
Breakdown of the location of payments	Domestic	0050				
	Cross-border	0060				
Breakdown of payment service users	Non-consumer users of payment service	0070				
	Consumer	0080				

Report 3: Number of payment accounts and total charges (euro)

- The report should include information on **payment accounts and the total charges related to these accounts** during the reference period.
- a. Number of payment accounts**
- **Payment account** means: “**an account held in the name of one or more payment service users which is used for the execution of payment transactions**” pursuant to Article 2(5) of the SEPA Regulation, which refers to Article 4(12) of Directive (EU) 2015/2366 (Payment Services Directive – PSD2).
 - **The total** should reflect **the number of accounts at the end of the reference period**.
 - **All payment accounts** must be included **regardless of the currency in which they are denominated**.
- b. Total value of payment account charges**
- The total value of charges refers to the **total annual costs of charges paid from a payment account**. This is reported to account holders in an annual **service charge breakdown**. For accounts not covered by Directive 2014/92/EU (Payment Accounts Directive – PAD) and where the service charge breakdown is not mandatory or available to the account holder, the figure should still reflect the total annual charges paid by account holders for the services related to the payment account. These charges may vary depending on the number and type of services provided and the pricing model applied by the payment service provider (PSP).
 - In the case of a **predefined service package (or “fixed monthly charge”)**, where one or more services are included in a service package linked to a payment account, **only the fixed fee for the whole package plus any additional charges for services exceeding the amount included in the package (if applicable) should be reported**.
 - **All charges** must be included regardless of the currency in which they are denominated. If the charges are in a currency other than the one in which the information is reported in this form, the value of the charges must be **converted into euros or other national currencies using either the ECB reference rate or the exchange rates applied to the transactions in question, pursuant to Regulation (EU) No 1409/2013**.
- c. Payment account maintenance charges**
- i.e. the charges that the service provider applies for managing the account available to the customer.

Report 3: Number of payment accounts and total charges (euro)

			Number of payment accounts	Total value of charges related to payment accounts		
						of which payment account maintenance charges
			0010	0020	0030	
Total		0010				

Report 4: Number of rejected instant payments – Sanctions screening

Sanctions screening: Monitoring of payment service users by payment service providers offering instant credit transfers to check whether **the payment service user is a person or entity subject to targeted financial restrictive measures** (sanctions)

- Payment service providers shall carry out **such checks immediately after the entry into force of new targeted financial restrictive measures** and immediately after the entry into force of changes to such targeted financial restrictive measures and **at least once every calendar day**.
- a. **The report must include information on the number of rejected instant credit transfers** due to the application of targeted financial restraint measures during the reference period.

The purpose of the reporting is to verify the number of cases in which a credit transfer by an entity subject to targeted financial restraint measures has not been permitted to be executed, irrespective of the mechanism used (this may be due to the payer's or payee's payment service provider suspending the execution of the initiated transaction, or the payer's payment service provider freezing the funds before the initiation of the instant credit transfer, or the payee's payment service provider freezing the funds after the instant credit transfer has reached the account).
- b. **domestic and cross-border transfers (to EU countries)**

Report 4: Number of rejected instant payments – Sanctions screening

			Cases in which instant credit transfers were not executed or funds were frozen:	
			By the payee's payment service provider	By the payer's payment service provider
			0010	0020
Total		0010		
Breakdown of the location of payments	Domestic	0020		
	Cross-border	0030		

Legislation

- In practice, the Instant Payments Regulation has amended
 - SEPA Regulation (EU) No 260/2012 (new Articles 5a - 5d)
 - Regulation (EU) 2021/1230 on cross-border payments in the Union
 - Second Payment Services Directive (EU) 2015/2366 (PSD2)
 - Finality of Settlement Directive 98/26/EC
- [Regulation \(EU\) 2024/886 of the European Parliament and of the Council of 13 March 2024 amending Regulations \(EU\) No 260/2012 and \(EU\) 2021/1230 and Directives 98/26/EC and \(EU\) 2015/2366 as regards instant credit transfers in euro: Instant Payments Regulation](#)
- HE 215/2024 [Government proposal to Parliament for legislation supplementing the EU Instant Payments Regulation](#) (in Finnish)
- The Regulation requires the provision of sanctions, the implementation of the amendments to the Second Payment Services Directive and the adding of the concept ‘instant credit transfer’ to national legislation.
 - Amendments to the Payment Services Act, the Payment Institutions Act and the Act on the Financial Supervisory Authority

Technical Implementing Standards

- The European Banking Authority (EBA) has published the draft of the final Implementing Technical Standards (ITS) on the reporting of credit transfers and payment account charges and the share of rejected payment transactions.

[The EBA publishes its draft final technical standards on reporting of data on charges for credit transfers and payments accounts, and shares of rejected transactions | European Banking Authority](#)

Questions

Contacts and additional information

- Information about the Reporting System can be found on the FIN-FSA's [website](#).
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- Questions and feedback NewReportingSystem@finanssivalvonta.fi

Thank you - the event has ended