

# Consultation Paper on changes to ITS on supervisory reporting: IFRS 18 FINREP changes

Fields marked with \* are mandatory.

## Introduction

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The EBA invites comments on all proposals put forward in this paper and in particular on the specific questions detailed below.

Comments are most helpful if they:

- respond to the question stated; indicate the specific point to which a comment relates;
- are supported by a clear rationale;
- provide evidence to support the views expressed/ rationale proposed; and
- provide alternative regulatory options for consideration by the EBA.

### **Important note to users:**

All the fields marked (\*) are mandatory. In case a question is not relevant for you, please answer with "Non-Applicable" or "NA". Please note that the maximum length of the answers to any single question is technically limited by the tool to 5000 characters.

All contributions received will be published following the close of the consultation, unless you request otherwise by ticking the relevant box in the form below. Please note that a request to access a confidential response may be submitted 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.

### **Personal data protection:**

The protection of individuals with regard to the processing of personal data by the EBA is based on [Regulation \(EU\) 2018/1725](#). Further information on the processing of the personal data is available in the [Data Protection Notice](#).

Should you encounter issues with submitting your responses, please contact us by email at [eba.consultation@eba.europa.eu](mailto:eba.consultation@eba.europa.eu) no later than 48 hours before the deadline of the consultation period.

Please provide your responses by **10 May 2026 23:59 CEST**. Late responses will not be considered

**Many thanks for your cooperation and support!**

## Who is responding

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\* Name of the organisation

Clearstream

\* Contact name

Hannah Schneider

\* Contact email

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\* Disclose comments

- Yes  
 No

## Questions for consultation

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\* **Question 1.** Do respondents agree with the proposed classification of income and expenses in template F 02.00? If not, which alternative classification would you suggest?

Clearstream Banking Luxembourg (CBL) agrees with the proposed classification of income and expenses in template F 02.00. The reshaping of the statement of profit or loss based on a retail and investment bank benchmark is understood as a pragmatic way to implement IFRS 18 while ensuring a standardised presentation and preserving, to the extent possible, the information currently reported in FINREP.

CBL notes that, as a bank operating as a central securities depository, its main activities are service and infrastructure driven, with operating income largely fee based and investing activities generally ancillary. As anticipated in the consultation paper for institutions whose business models differ from the benchmark, this may result in a greater use of residual rows in template F 02.00. While no alternative classification is proposed, additional guidance or examples covering such business models would support consistent application and facilitate supervisory interpretation.

\* **Question 2.** Do respondents agree with the proposed Finrep inclusion of the row 0599 'Income or (-) expenses on investing financial assets and on any related financial instruments' to handle any situation where an institution provides financing to customers as main business activities, but not investing in financial assets? If not, please provide the rationale backing your view.

CBL agrees with the proposed inclusion of row 0599.  
This row appropriately addresses situations where investing in financial assets is not a main business activity.

For CBL, it provides a clear and proportionate way to present income and expenses from ancillary investing activities without affecting the representation of core operating performance, in line with the benchmark based approach described in the consultation paper.

**\* Question 3.** Do respondents agree with the introduction of a breakdown by category of income and expenses (operating, investing and financing) in templates F 16 and F 45? If not, which alternative representation would you suggest?

CBL agrees with the introduction of a breakdown by operating, investing and financing categories in templates F 16 and F 45.

This breakdown is essential to maintain the current level of granularity, particularly where information is aggregated into residual rows in template F 02.00 due to the application of the benchmark model. It ensures that supervisors retain visibility on the underlying drivers of income and expenses, regardless of the institution's specific business model.

**\* Question 4.** Is there any additional change introduced by IFRS 18 that needs to be reflected in Finrep templates to convey to supervisors an appropriate level of financial information on your institution?

CBL does not identify any additional IFRS 18 changes that would require further amendments to the Finrep templates beyond those already proposed.

Nevertheless, clear guidance on the application of the benchmark model to institutions with predominantly service- and infrastructure-based activities would be helpful to ensure consistent reporting and interpretation. Subject to this, the proposed changes appear sufficient to convey an appropriate and proportionate level of financial information to supervisors.

## Contact

[Contact Form](#)