

Recommendations on supervisory flexibility regarding the deadline of supervisory reporting and public disclosure - Coronavirus/COVID-19

Frequently asked questions

1. In Recommendation 1, does the reference to "Annual reporting referring to year-end occurring on 31 December 2019 or year-end after that date but before 1 April 2020" mean year end from 31 December 2019 to 31 March 2020 inclusive?

Does this mean therefore that Recommendation 2 which covers "Quarterly reporting referring to Q12020-end occurring on 31 March 2020 or after that date but before 30 June 2020" refers to undertakings where their Q1 ends 31 March 2020 to 29 June 2020 inclusive?

Is this intended?

Yes, that is the intention. If the Quarter ends on 30/6 then it would be similar to Q2 of end-December year-end undertakings for which no decision is made yet.

2. In Recommendation 3, the publication of the full public disclosures (SFCR plus All public QRTs) be delayed by 8 week. However, a limited set of templates (S.02.01, S.22.01, S.23.01, S.25.01) must be published within 2 weeks of the deadline (7 April). Is this interpretation correct?

The interpretation is correct.

- 3. Does this mean that undertakings would potentially publish a separate annex of the latter QRTs and then later publish the full set with the SFCR?

 Yes.
- 4. Is the impact of COVID-19 to be included in the SFCR?

No, the impact of COVID-19 is to be published already when the first set of templates is published.

5. Does that mean we should expect to see the 4 templates plus a separate statement on COVID-19 related (but not necessarily the whole SFCR) and will this statement have to be incorporated in the full SFCR when it is published?

Information should be made available in the same location of the 4 templates. When the SFCR is published it is expected that the same or updated information is also disclosed but this is not addressed in the Recommendation.

6. Has EIOPA published additional guidance on the format of the COVID-19 statement (if it is different from the existing documents)?

The format and content of the information depends on the specific risk profile of the undertakings and therefore was left open.

- 7. Regarding the estimation referred to in para. 20 it should be considered that:
 - a roll forward might not be sufficiently accurate and a full recalculation might be needed;
 - However, a one week delay will not be long enough to do a full recalculation of the SCR.

Do you think a full recalculation is necessary, or would an estimation be sufficient?

For the purposes of reporting Q1 an estimation would be sufficient. However, in specific cases NSAs may request full recalculations depending on the specific situation of the undertakings.