

## GUIDELINES COMPLIANCE TABLE

---

### JOINT GUIDELINES ON THE ESTIMATION OF AGGREGATED ANNUAL COSTS AND LOSSES CAUSED BY MAJOR ICT-RELATED INCIDENTS UNDER REGULATION (EU) 2022/2554

**JC 2024 34**

**Date of adoption:** 18/03/2025

**Date of application:** 19/05/2025

**Last update of the Table:** 28/01/2026

The following competent authorities (NCAs) comply or intend to comply with the EIOPA's Guidelines on estimations DORA:

Member States		Competent Authority	Complies or intends to comply	Comments
AT	Austria	Austrian Financial Market Authority	Y = Yes, comply	<p>AFMA complies with all Guidelines through the following implementing measures:</p> <ol style="list-style-type: none"> <li>1. Amendment of supervisory practice by executing the Guidelines in line with Article 16 (3) EIOPA-Regulation</li> <li>2. Application of Article 11 (10) DORA-Regulation</li> <li>3. Application of Article 107 (4) Insurance Supervision Act 2016</li> <li>4. Application of § 4 (3) DORA Enforcement Act</li> <li>5. Publishing the Guidelines on the FMA-Website</li> <li>6. Information about the application of the Guidelines through a letter addressed to supervised undertakings.</li> </ol> <p>Link to implementing measures:</p> <p><a href="#">RIS - Versicherungsaufsichtsgesetz 2016 - Bundesrecht konsolidiert, Fassung vom 19.05.2025.</a></p>

BE	Belgium	Financial Services and Markets Authority (FSMA)	<b>IC = Yes, intends to comply</b>	We intend to integrate this data collection in an already existing reporting process for which we will communicate the modalities/changes by the end of 2025. We therefore intend to comply by 31/12/2025.
BG	Bulgaria	Financial Supervision Commission	<b>Y = Yes, comply</b>	On 17 June 2025 the Bulgarian Financial Supervision Commission adopted Guidelines on the assessment of aggregated annual costs and losses caused by significant information and communication technology incidents, available at the following link <a href="https://www.fsc.bg/wp-content/uploads/2025/06/ukazaniya-dora.pdf">https://www.fsc.bg/wp-content/uploads/2025/06/ukazaniya-dora.pdf</a> (only in Bulgarian language). After that the Bulgarian Financial Supervision Commission took Decision for full compliance with the Guidelines, the Decision is available at the following link: <a href="https://www.fsc.bg/wp-content/uploads/2025/06/375.pdf">https://www.fsc.bg/wp-content/uploads/2025/06/375.pdf</a> (only in Bulgarian language).
HR	Croatia	Croatian Financial Services Supervisory Agency	<b>Y = Yes, comply</b>	HANFA complies with all Guidelines through the following implementing measures: <a href="https://www.hanfa.hr/podruca-nadzora/obavijesti-subjektima-nadzora/obavijest-subjektima-nadzora-primjeni-zajednickih-smjernica-o-procjeni-agregiranih-godisnjih-troskova-i-gubitaka-koji-su-posljedica-znacajnih-ikt-incidenta-u-skladu-s-uredbom-eu-20222554-jc-2024-34/">https://www.hanfa.hr/podruca-nadzora/obavijesti-subjektima-nadzora/obavijest-subjektima-nadzora-primjeni-zajednickih-smjernica-o-procjeni-agregiranih-godisnjih-troskova-i-gubitaka-koji-su-posljedica-znacajnih-ikt-incidenta-u-skladu-s-uredbom-eu-20222554-jc-2024-34/</a> .
CY	Cyprus	Insurance companies control service		

CZ	Czech Republic	Czech National Bank		
DK	Denmark	Danish Financial Supervisory Authority (DFSA/"Fina nstilsynet")	<b>Y = Yes, comply</b>	<p><u>Official website of DK-FSA: Estimation of aggregated annual costs and losses caused by major ICT-related incidents under DORA (Section: Beregninger af omkostninger og tab ved IKT-hændelser).</u></p>
EE	Estonia	Finantinspe ktsioon		
FI	Finland	Financial Supervisory Authority	<b>Y = Yes, comply</b>	All guidelines issued by the ESAs are published on the website of the FIN-FSA. Link to implementing measures: <a href="https://www.finanssivalvonta.fi/saantely/euroopan-valvontaviranomaisten-ohjeet/">https://www.finanssivalvonta.fi/saantely/euroopan-valvontaviranomaisten-ohjeet/</a> .
FR	France	ACPR		
DE	Germany	BaFin	<b>Y = Yes, comply</b>	BaFin complies with all Guidelines through the following implementing measures: <a href="https://www.bafin.de/ref/19669324">https://www.bafin.de/ref/19669324</a> .
GR	Greece	Bank of Greece	<b>IC = Yes, intends to comply</b>	Until necessary legislative or regulatory proceedings have been completed.
HU	Hungary	Hungarian National Bank	<b>IC = Yes, intends to comply</b>	The MNB implements the aforementioned Joint Guidelines (JC 2024 34) as part of an MNB Decree (on reporting) by 1 January 2026.
IE	Ireland	Central Bank of Ireland	<b>Y = Yes, comply</b>	Central Bank of Ireland complies with all Guidelines through the following implementing measures:

				<a href="https://www.centralbank.ie/regulation/consumer-protection/european-supervisory-authority-guidelines">https://www.centralbank.ie/regulation/consumer-protection/european-supervisory-authority-guidelines</a> .
IT	Italy	IVASS	<b>IC = Yes, intends to comply</b>	IVASS will implement by issuing specific technical instructions.
LV	Latvia	Financial and Capital Market Commission	<b>IC = Yes, intends to comply</b>	As the national legal process transposing DORA is not finalized and the law is not adopted yet, Latvijas Banka has not been legally mandated with powers to adopt any national measures to ensure compliance with the joint ESAs Guidelines. It is foreseen that the DORA law will be adopted by the end of October, 2025. As soon as the law is adopted, Latvijas Banka will be able to ensure compliance with the Guidelines.
LT	Lithuania	Bank of Lithuania	<b>Y = Yes, comply</b>	LB complies with all Guidelines through the following implementing measures: <a href="https://www.lb.lt/uploads/documents/docs/53046_d9561047c383051eb00b6b9e92d3dd39.pdf">https://www.lb.lt/uploads/documents/docs/53046_d9561047c383051eb00b6b9e92d3dd39.pdf</a> .
LU	Luxembourg	Commissariat aux assurances		
MT	Malta	Malta Financial Services Authority	<b>IC = Yes, intends to comply</b>	<p>The Malta Financial Services Authority (the 'MFSA') intends to comply with the Joint Guidelines on the estimation of aggregated annual costs and losses caused by major ICT-related incidents under the DORA (JC/GL/2024/34) through the 'Major ICT-Related Incident Reporting and Management' procedure established by the MFSA.</p> <p>The aforementioned procedure is largely based on Chapter III (ICT-related incident management, classification, and reporting) of Regulation (EU) 2022/2554 (the 'DORA'). The procedure applies to all reported Major ICT-Related Incidents and duly outlines the Authority's response to Major ICT-Related Incidents, including receiving, managing, recording and other responsibilities.</p> <p>Reference to the Joint Guidelines will be included in an Annex - 'Costs and Losses',</p>

				<p>appended to the procedure at issue. This Annex mentions that in line with Article 11(10) and (11) of DORA, and the Joint Guidelines, FEs (other than microenterprises) shall report to competent authorities, upon the Authority's request, an estimation of aggregated annual costs and losses caused by Major ICT-Related Incidents.</p> <p>The template which shall be used for reporting annual costs and losses, is found in the Joint Guidelines itself. The Annex, in line with the Joint Guidelines, further explains what should be reported and how the Financial Entities should estimate the aggregated annual costs and losses. It has also been noted that all credit Institutions, both SIs and LSIs, will be reporting costs and losses through the ECB standard ICT Risk Questionnaire as part of the 'SREP' process.</p>
NL	Netherlands	National Bank of Netherlands	<b>Y = Yes, comply</b>	The compliance is fitting within the mandate of DNB and AFM in the Netherlands.
PL	Poland	KNF - Polish Financial Supervision Authority	<b>Y = Yes, comply</b>	<p>As part of the implementation process, a reporting form (in Polish) has been prepared, in line with the Annex to the Guidelines. This form will be used to collect the relevant information in the event of a request by a supervisory authority under Article 11(10) DORA.</p> <p>Additionally, work has been carried out to design a process for obtaining the requested information in accordance with Article 11(10) of the DORA and the Guidelines.</p>
PT	Portugal	Autoridade de Supervisão de Seguros e Fundos de Pensões (ASF)	<b>IC = Yes, intends to comply</b>	ASF will comply with these guidelines through regulatory action, by such time as the necessary regulatory proceedings have been completed. The completion of these regulatory proceedings depends on the publication of the national legislation implementing the DORA Regulation.
RO	Romania	Romanian Financial Supervisory Authority	<b>IC = Yes, intends to comply</b>	The Romanian Financial Supervisory Authority (ASF) shall develop, by the end of August 2025, an internal procedure regarding the compliance with the Joint Guidelines on the estimation of

				aggregated costs/losses caused by major ICT-related incidents.  Currently, the process of adoption of the national law for establishing the measures implementing the DORA Regulation is following the national procedure after being agreed between ASF and BNR, being promoted as an Emergency Government Ordinance. Subsequently, ASF will upgrade internal procedures in terms of supervision, by comprising all aspects related to DORA supervision, including the aspects mentioned in the Joint GL on costs/losses mentioned above.
SK	Slovakia	National Bank of Slovakia		
SI	Slovenia	Insurance Supervision Agency		
ES	Spain	Directorate General for Insurance and Pension Funds	<b>Y = Yes, comply</b>	DGSFP complies with all Guidelines through the following implementing measures: <a href="#"><u>Regulación</u></a> .
SE	Sweden	Financial Supervisory Authority		
<b>EEA-EFTA States</b>				
IS	Iceland	The Financial Supervisory Authority of the Central Bank of Iceland Reykjavík (Fjármálaeftirlið Seðlabanka Íslands)	<b>IC = Yes, intends to comply</b>	The Financial Supervisory Authority of the Central Bank of Iceland Reykjavík intends to comply with the Guidelines by the date when necessary legislative or regulatory proceedings have been completed. DORA is expected to be implemented into Icelandic legislation in the second half of 2025.

LI	Liechtenstein	Financial Market Authority	<b>Y = Yes, comply</b>	The Guidelines and FMA's compliance declaration will be published. Link to implementing measure: <a href="https://www.fma-li.li/de/aufsichtsregulierung/europaeische-aufsichtsbehoerden/guidelines"><u>https://www.fma-li.li/de/aufsichtsregulierung/europaeische-aufsichtsbehoerden/guidelines</u></a> .
NO	Norway	Finanstilsynet		

EIOPA endeavours to ensure the accuracy of this document, however, the information is provided by the competent authorities. For further information on the current position of any competent authority, please contact that competent authority. Contact details can be obtained from our website ([www.eiopa.europa.eu](http://www.eiopa.europa.eu)).

## NOTES

**Comply-or-explain mechanism for competent authorities:** In accordance with Article 16 of the EIOPA Regulation, competent authorities are required to make every effort to comply with guidelines or recommendations. Competent authorities to whom guidelines or recommendations apply should comply by incorporating them into their regulatory or supervisory framework in an appropriate manner.

Guidelines or recommendations are not applicable to a competent authority if it concerns financial institutions or financial instruments that do not exist in the jurisdiction of the Member State due to prohibition under national law, provided the prohibition complies with Union law. If only part of the guidelines or recommendations is not applicable, the final status needs to reflect the compliance status of the applicable provisions (i.e. comply, intend to comply, or not comply).

A competent authority is considered to intend-to-comply under the following circumstances:

- When guidelines or recommendations pertain to financial institutions or financial instruments that do not currently exist in the jurisdiction of the competent authority, but which are not prohibited under national law, and the competent authority notifies EIOPA of its intention to comply with an explanation of the circumstances. This will be considered as intending to comply until the relevant financial institutions or financial instruments are established and the competent authority notifies EIOPA thereof.
- When legislative, regulatory, or internal proceedings have been initiated to implement measures necessary for compliance with the guidelines or recommendations. If the competent authority notifies EIOPA of its intention to comply, along with an explanation of the ongoing process, it will be considered as intending to comply until the proceedings are completed and EIOPA is duly notified.

A competent authority is considered to comply with the guidelines or recommendations if it complies with all individual provisions within those guidelines or recommendations. If it fails to comply with one or more individual provisions, it is considered non-compliant. If the authority complies with some provisions and intends to comply with other provisions, it will be considered as intend to comply. The compliance overview table published by EIOPA will report the status of compliance with the guidelines or recommendations. The compliance tables published by EIOPA and referred in the compliance overview table will note the individual provisions with which the competent authority is compliant, intend to comply and is non-compliant.

**Confirmation by competent authorities:** After being informed by EIOPA about the publication of translations and confirmation deadline, competent authorities need to send a confirmation to EIOPA by the confirmation deadline, specifying whether they:

- comply with the guidelines or recommendations, including either a summary or an electronic link to the implementing measures published in the relevant jurisdiction. In certain cases, links to published competent authorities' communications or formal statements confirming compliance may also be acceptable, provided they offer sufficient clarity and transparency;
- intend to comply with the guidelines or recommendations, including the intended date of compliance and details of the measures being undertaken to ensure compliance with the guidelines or recommendations;
- do not comply with the guidelines or recommendations, including a reasoned explanation for non-compliance; or
- consider the guidelines or recommendations not to be applicable, with a reasoned explanation for why the guidelines or recommendations are not applicable to them.

If the status of compliance varies between individual provisions of the guidelines or recommendations, the competent authority is to specify the status for each provision (i.e. comply, intend to comply, do not comply, or not applicable). When multiple provisions share the same status and justification, they may be grouped together with a single explanation to avoid repetition.

The format and method for the confirmation is specified by EIOPA.

The confirmation deadline is two months after the date of issuance. After the confirmation deadline, EIOPA notifies competent authorities regarding the confirmations received and publishes the confirmations on its website. If a competent authority fails to submit a confirmation by the deadline, it will be considered non-compliant and will be reported as such until a confirmation is received specifying that they comply or intend to comply.

Any change in compliance status needs to be reported to EIOPA. For example, if a competent authority intends to comply by a certain date, an update should be provided once compliance is achieved. If guidelines or recommendations initially deemed not applicable later become applicable, an update is also required. An updated confirmation is required in such instances. Changes in compliance status are published by EIOPA in a timely manner.