

Reg. No: 632/020/20-01/MD  
Zagreb, 4 August 2020

**TO ALL CREDIT INSTITUTIONS**  
**Attention of: Management Board**

**Subject: Application of the EBA Guidelines on reporting and disclosure of exposures subject to measures applied in response to the COVID-19 crisis**

Dear Sir/Madam,

We hereby draw your attention to the fact that the European Banking Authority (hereinafter: the EBA) on 2 June 2020 issued the Guidelines on reporting and disclosure of exposures subject to measures applied in response to the COVID-19 crisis (EBA/GL/2020/07; hereinafter: the Guidelines). In view of the current situation with the COVID-19 pandemic and the need to ensure essential information, the Guidelines shall apply immediately.

More specifically, in accordance with Article 4, paragraph (1), item (3) of the Credit Institutions Act (Official Gazette 159/2013, 19/2015, 102/2015, 15/2018, 70/2019 and 47/2020), the Croatian National Bank (hereinafter: the CNB) shall, among other things, make every effort to comply with those guidelines and recommendations issued by the EBA in accordance with Article 16 of Regulation (EU) No 1093/2010.

The Guidelines specify the formats and the content of the reports that credit institutions should submit to competent authorities and disclose to the public. The objective of the Guidelines is to enable supervisory monitoring of activities taken by credit institutions in response to the COVID-19 crisis as well as to inform the public of such activities.

*Reporting requirements*

As regards reporting to competent authorities, reports cover the following:

- exposures that meet the conditions set out in paragraph 10 of EBA Guidelines on legislative and non-legislative moratoria on loan repayments applied in light of the COVID-19 crisis;
- exposures subject to forbearance measures applied in response to the COVID-19 crisis; and
- newly originated exposures subject to public guarantee schemes introduced in Member States in response to the COVID-19 crisis.

The CNB expects from credit institutions to follow the reporting requirements under the Guidelines as follows:

1. The CNB expects reports from all credit institutions.
2. Reports should be submitted at a non-consolidated level and, where applicable, consolidated level.
3. The Guidelines define 11 templates. However, after taking into account the proportionality of application and the purposes of supervision, the CNB identified the following four templates that should be submitted:
  - a) F 90.01 – Overview of EBA-compliant moratoria (legislative and non-legislative);
  - b) F 90.03 – Overview of newly originated loans and advances subject to public guarantee schemes in the context of the COVID-19 crisis;
  - c) F 91.01 – Information on loans and advances subject to EBA-compliant moratoria (legislative and non-legislative);
  - d) F 91.05 – Information on newly originated loans and advances subject to public guarantee schemes in the context of the COVID-19 crisis.

Other templates should be left empty.

4. The template instructions contained in the Guidelines should be followed.
5. Reporting should be performed on a quarterly basis, in line with the time limits for the delivery of quarterly FINREP reports. The first reporting date is 30 June 2020.
6. The new reporting framework is built on the definitions and technical standards provided in Commission Implementing Regulation (EU) No 680/2014 (FINREP). Reports should be submitted in XML format, using appropriate data points. The IT solution will be available in the technical annexes to the Decision on the IT-solutions for the delivery of reports of credit institutions in accordance with European Union regulations, which are available on the CNB website.
7. By way of derogation from items (5) and (6), credit institutions shall submit the first reports, as at 30 June 2020, by 30 September 2020, in the format of an Excel table. Reports with data in kuna shall for the first reference date only be submitted to the following e-mail address: [bonitetno.izvjescivanje@hnb.hr](mailto:bonitetno.izvjescivanje@hnb.hr). Used for that purpose are the data file templates provided with the Guidelines on the EBA website. We point out that the structure of tables may not be changed as that may inhibit their correct processing by the CNB and EBA.

#### *Disclosure requirements*

As regards disclosure, reports cover the following:

- exposures that meet the conditions set out in paragraph 10 of EBA Guidelines on legislative and non-legislative moratoria on loan repayments applied in light of the COVID-19 crisis;
- newly originated exposures subject to public guarantee schemes introduced in Member States in response to the COVID-19 crisis.

The CNB expects from credit institutions to follow the disclosure requirements under the Guidelines as follows:

1. The CNB expects that relevant reports will be disclosed only by systemically important credit institutions.
2. Reports should be disclosed at a non-consolidated level and, where applicable, consolidated level.
3. The template formats and instructions contained in the Guidelines should be followed.
4. Reports should be disclosed semi-annually, as at 30 June and 31 December, and be subject to other disclosure requirements. The first reference date is 30 June 2020.
5. By way of derogation from point (4), credit institutions may disclose the first reports, as at 30 June 2020, by 30 September 2020.

Please note that these are temporary requirements arising from the current epidemiological situation in the RC and the EU. The Guidelines are expected to last for a period of 18 months. The CNB has therefore decided to ensure the application of the Guidelines by expressing its expectations from credit institutions. If a credit institution fails to adhere to the CNB's expectations regarding the application of the Guidelines, the CNB will consider the need to impose supervisory measures to ensure compliance with the Guidelines.

The Guidelines, together with the associated templates, are available on the EBA website:

<https://eba.europa.eu/regulation-and-policy/supervisory-reporting/guidelines-covid-19-measures-reporting-and-disclosure>.

Kind regards,

**Martina Drvar**  
Vicegovernor