CRITICAL FUNCTIONS REGISTER

Entity: EuroFinance Bank AG **LEI:** 529900ABCDEFGHIJ1234 **Register Reference:** CFR-2025-001 **Last Updated:** January 15, 2025 **Next Review:** July 15, 2025

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1. EXECUTIVE SUMMARY

This register documents all critical or important functions of EuroFinance Bank AG as required under DORA Article 3(22) and the Regulatory Technical Standards on the Register of Information.

1.1 Summary Statistics

Category	Count
Critical Functions	8
Important Functions	12
Total Functions Identified	20
Functions Supported by ICT TPPs	15
Functions with Substitutability Concerns	4

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2. CRITICAL FUNCTIONS

CF-001: Payment Processing

Attribute	Value
Function Code	CF-001
Function Name	Payment Processing
Licensed Activity	Payment Services (PSD2)
Criticality	Critical
Regulatory Basis	PSD2, TARGET2 participation
Business Impact if Disrupted	Immediate regulatory breach, customer harm
RTO Requirement	2 hours

Attribute	Value
RPO Requirement	0 (zero data loss)
Annual Transaction Volume	45 million
Annual Value Processed	EUR 890 billion

ICT Services Supporting This Function:

Service ID	Provider	Service Type	Criticality
SVC-001	NordCloud Systems AG	Cloud Infrastructure	Critical
SVC-002	NordCloud Systems AG	Core Banking SaaS	Critical
SVC-INT-001	EuroFinance Internal	Payment Gateway	Critical

Risk Assessment: - Concentration: High (single cloud provider) - Substitutability: Medium (6-month migration) - Regulatory Impact: Very High

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CF-002: Customer Deposit Management

Attribute	Value
Function Code	CF-002
Function Name	Customer Deposit Management
Licensed Activity	Deposit Taking (CRD)
Criticality	Critical
Regulatory Basis	Banking Act, DGS Directive
Business Impact if Disrupted	Regulatory breach, liquidity risk
RTO Requirement	4 hours
RPO Requirement	1 hour
Customer Accounts	515,000
Total Deposits	EUR 12.5 billion

ICT Services Supporting This Function:

Service ID	Provider	Service Type	Criticality
SVC-002	NordCloud Systems AG	Core Banking SaaS	Critical
SVC-003	NordCloud Systems AG	Database Services	Critical

CF-003: Lending Operations

Attribute	Value
Function Code	CF-003
Function Name	Lending Operations
Licensed Activity	Credit Provision (CRD)
Criticality	Critical
Regulatory Basis	Banking Act
Business Impact if Disrupted	Revenue loss, customer impact
RTO Requirement	8 hours
RPO Requirement	4 hours
Active Loan Accounts	125,000
Total Loan Portfolio	EUR 8.7 billion

ICT Services Supporting This Function:

Service ID	Provider	Service Type	Criticality
SVC-002	NordCloud Systems AG	Core Banking SaaS	Critical
SVC-003	NordCloud Systems AG	Database Services	Critical
SVC-EXT-001	CreditScore AG	Credit Scoring API	Important

CF-004: Regulatory Reporting

Attribute	Value
Function Code	CF-004
Function Name	Regulatory Reporting

Attribute	Value
Licensed Activity	All Licensed Activities
Criticality	Critical
Regulatory Basis	CRR, FINREP, COREP
Business Impact if Disrupted	Regulatory sanctions
RTO Requirement	24 hours
RPO Requirement	4 hours
Reports Submitted Annually	156
Supervisory Authorities	BaFin, ECB, EBA

ICT Services Supporting This Function:

Service ID	Provider	Service Type	Criticality
SVC-002	NordCloud Systems AG	Core Banking SaaS	Critical
SVC-003	NordCloud Systems AG	Database Services	Critical
SVC-INT-002	EuroFinance Internal	Regulatory Platform	Critical

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CF-005: AML/KYC Operations

Attribute	Value
Function Code	CF-005
Function Name	AML/KYC Operations
Licensed Activity	All Customer-Facing
Criticality	Critical
Regulatory Basis	AMLD6, GwG
Business Impact if Disrupted	Regulatory breach, sanctions
RTO Requirement	4 hours
RPO Requirement	1 hour
Daily Screenings	50,000

Attribute	Value
SAR Filed Annually	1,250

ICT Services Supporting This Function:

Service ID	Provider	Service Type	Criticality
SVC-002	NordCloud Systems AG	Core Banking SaaS	Critical
SVC-EXT-002	WorldCheck Ltd	Sanctions Screening	Critical
SVC-EXT-003	VerifyID GmbH	Identity Verification	Important

CF-006: Treasury Operations

Attribute	Value
Function Code	CF-006
Function Name	Treasury Operations
Licensed Activity	Investment Services
Criticality	Critical
Regulatory Basis	MiFID II, CRR
Business Impact if Disrupted	Liquidity risk, market risk
RTO Requirement	2 hours
RPO Requirement	15 minutes
Daily Transaction Value	EUR 2.5 billion

ICT Services Supporting This Function:

Service ID	Provider	Service Type	Criticality
SVC-001	NordCloud Systems AG	Cloud Infrastructure	Critical
SVC-INT-003	EuroFinance Internal	Trading Platform	Critical
SVC-EXT-004	Bloomberg LP	Market Data	Critical

CF-007: Cybersecurity Operations

Attribute	Value
Function Code	CF-007
Function Name	Cybersecurity Operations
Licensed Activity	All
Criticality	Critical
Regulatory Basis	DORA, NIS2, BaFin BAIT
Business Impact if Disrupted	Security exposure, regulatory breach
RTO Requirement	0 (continuous)
RPO Requirement	0

ICT Services Supporting This Function:

Service ID	Provider	Service Type	Criticality
SVC-004	NordCloud Systems AG	Managed SOC	Critical
SVC-INT-004	EuroFinance Internal	SIEM Platform	Critical

CF-008: Core Banking Operations

Attribute	Value
Function Code	CF-008
Function Name	Core Banking Operations
Licensed Activity	Banking License
Criticality	Critical
Regulatory Basis	Banking Act
Business Impact if Disrupted	Complete operational failure
RTO Requirement	4 hours
RPO Requirement	1 hour

ICT Services Supporting This Function:

Service ID	Provider	Service Type	Criticality
SVC-001	NordCloud Systems AG	Cloud Infrastructure	Critical
SVC-002	NordCloud Systems AG	Core Banking SaaS	Critical
SVC-003	NordCloud Systems AG	Database Services	Critical

3. IMPORTANT FUNCTIONS

IF-001: Customer Onboarding

Attribute	Value
Function Code	IF-001
Function Name	Customer Onboarding
Licensed Activity	All Customer-Facing
Criticality	Important
RTO Requirement	24 hours
New Customers Monthly	2,500

IF-002: Customer Support

Attribute	Value
Function Code	IF-002
Function Name	Customer Support
Licensed Activity	All
Criticality	Important
RTO Requirement	8 hours
Monthly Interactions	85,000

IF-003: Digital Banking Channels

Attribute	Value
Function Code	IF-003
Function Name	Digital Banking Channels
Licensed Activity	All
Criticality	Important
RTO Requirement	4 hours
Monthly Active Users	380,000

IF-004: Card Services

Attribute	Value
Function Code	IF-004
Function Name	Card Services
Licensed Activity	Payment Services
Criticality	Important
RTO Requirement	4 hours
Active Cards	425,000

IF-005: Trade Finance

Attribute	Value
Function Code	IF-005
Function Name	Trade Finance
Licensed Activity	Banking
Criticality	Important
RTO Requirement	24 hours
Annual Volume	EUR 2.1 billion

IF-006: Wealth Management

Attribute	Value
Function Code	IF-006
Function Name	Wealth Management
Licensed Activity	Investment Services
Criticality	Important
RTO Requirement	8 hours
AUM	EUR 4.5 billion

IF-007: HR Operations

Attribute	Value
Function Code	IF-007
Function Name	HR Operations
Licensed Activity	Support
Criticality	Important
RTO Requirement	48 hours
Employees Supported	2,500

IF-008: Financial Accounting

Attribute	Value
Function Code	IF-008
Function Name	Financial Accounting
Licensed Activity	Support
Criticality	Important
RTO Requirement	24 hours

IF-009: Risk Management

Attribute	Value
Function Code	IF-009
Function Name	Risk Management
Licensed Activity	All
Criticality	Important
RTO Requirement	8 hours

IF-010: Compliance Management

Attribute	Value
Function Code	IF-010
Function Name	Compliance Management
Licensed Activity	All
Criticality	Important
RTO Requirement	24 hours

IF-011: Internal Audit

Attribute	Value
Function Code	IF-011
Function Name	Internal Audit
Licensed Activity	Support
Criticality	Important
RTO Requirement	48 hours

IF-012: Legal Operations

Attribute	Value
Function Code	IF-012
Function Name	Legal Operations
Licensed Activity	Support
Criticality	Important
RTO Requirement	48 hours

4. FUNCTION-ICT MAPPING SUMMARY

Function	Total ICT Services	Critical ICT	Third-Party ICT
CF-001	3	3	2
CF-002	2	2	2
CF-003	3	2	3
CF-004	3	3	2
CF-005	3	2	3
CF-006	3	3	2
CF-007	2	2	1
CF-008	3	3	3
Total	**22**	**20**	**18**

5. CONCENTRATION RISK ANALYSIS

5.1 Provider Concentration

Provider	Functions Supported	Criticality
NordCloud Systems AG	8 Critical, 6 Important	HIGH
Bloomberg LP	1 Critical	Medium

Provider	Functions Supported	Criticality
WorldCheck Ltd	1 Critical	Medium
Others	Various Important	Low

5.2 Geographic Concentration

Location	Functions	Data Types
Germany	20	All
Netherlands	15	Backup, DR
Ireland	10	DR only

6. REVIEW AND APPROVAL

Role	Name	Date	Signature
Head of Operations	Peter Weber	January 15, 2025	[Signed]
Chief Risk Officer	Dr. Friedrich Lange	January 15, 2025	[Signed]
Chief Information Officer	Thomas Schmidt	January 15, 2025	[Signed]
Chief Executive Officer	Maria Schmidt	January 15, 2025	[Signed]