RISK ASSESSMENT QUESTIONNAIRE

Graphs / Autumn 2025

Contents

Introduction

The EBA conducts semi-annual Risk Assessment Questionnaires (RAQs) among banks. This booklet presents a summary of the responses to the survey carried out in Autumn 2025, in which 85 banks[1] submitted their answers. Results of the survey were received in September 2025 and are presented in an aggregate form. The questionnaire is available in the Appendix. Where relevant, answers from former questionnaires may be presented. Responses that were not selected by any banks are not presented in the charts.

Should you wish to provide your feedback on this booklet, please do so by contacting rast@eba.europa.eu

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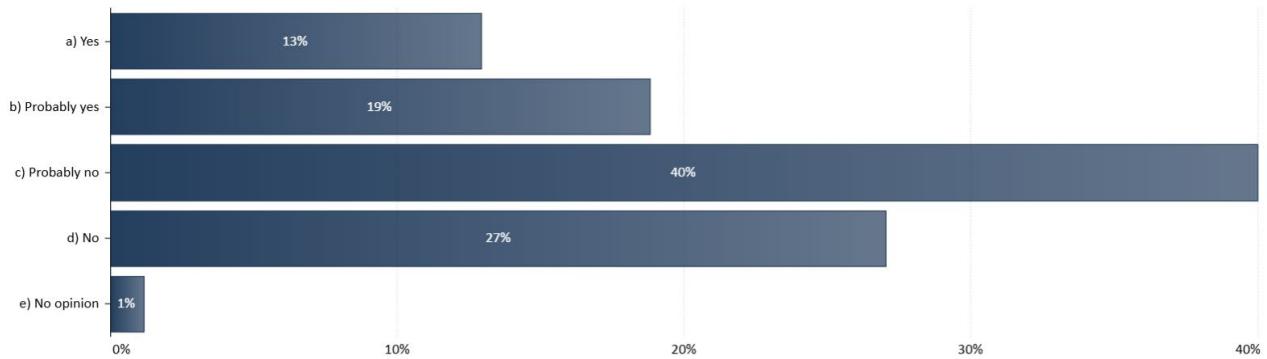
[1] A list of banks participating in the survey is published in the Annex.

Banks' questionnaire
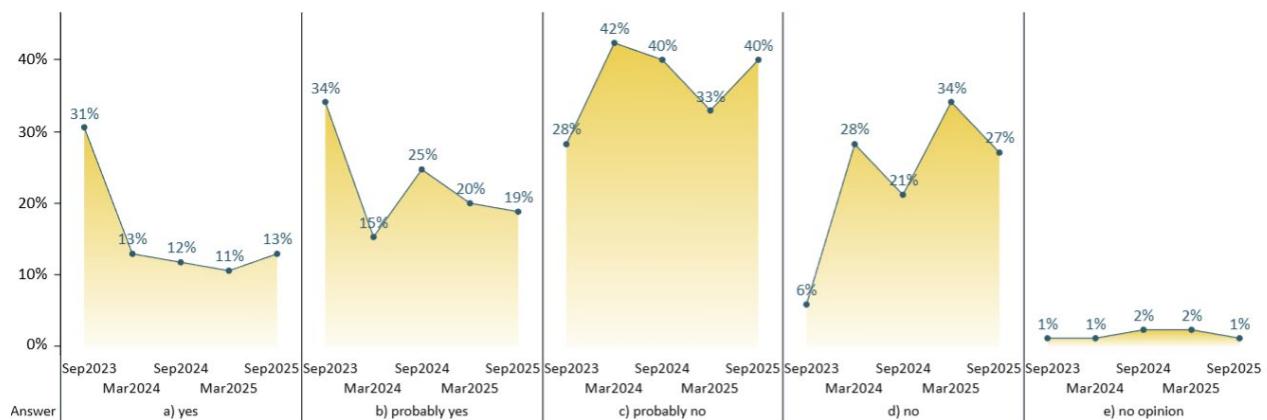
1. Business model / strategy / profitability

Question 1: Autumn 2025 results

Q1 Do you expect an overall increase in your bank's Return on Equity (RoE) over the next 6 to 12 months?
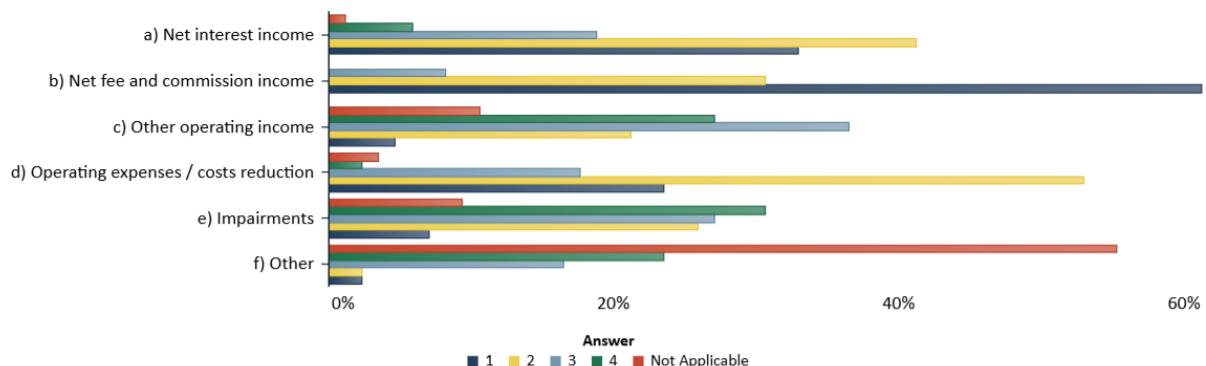
Question 1: Comparison with earlier results
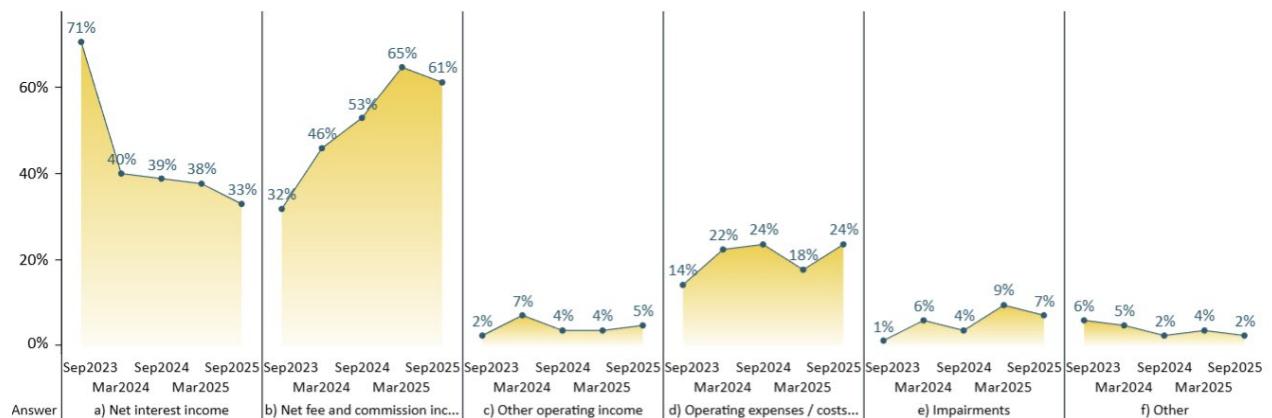
Question 2: Autumn 2025 results

Q2 Which areas are you primarily targeting to increase the profitability of your bank in the next 6 to 12 months? (Rank according to priority with 1 - High Priority and 4 - Low Priority)
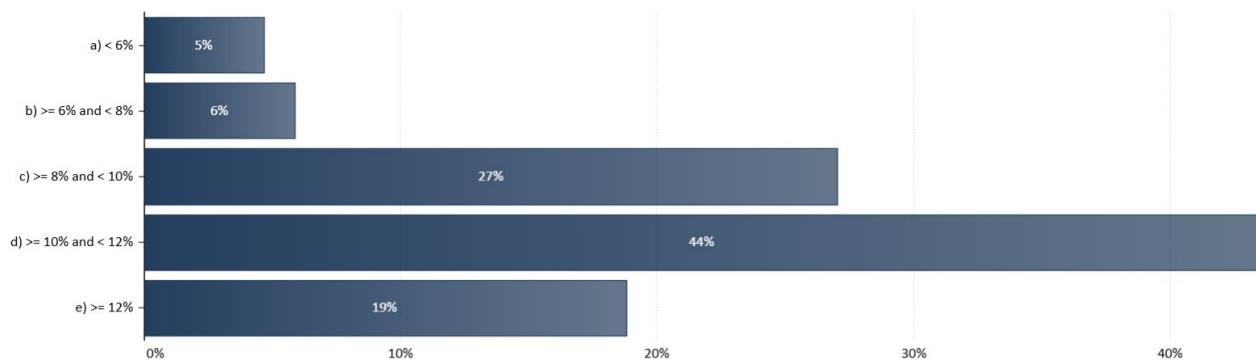
Question 2: Comparison with earlier results

1 - High Priority
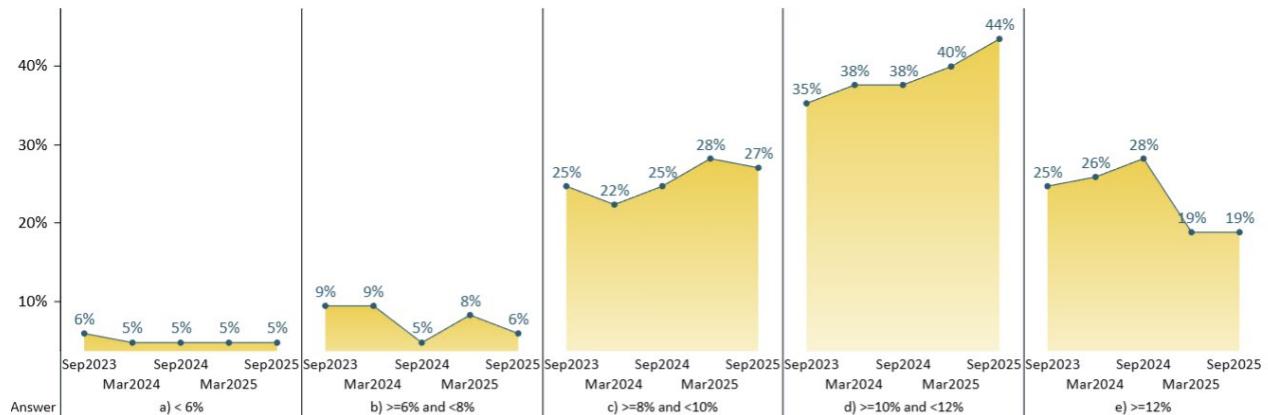
## Question 3: Autumn 2025 results

Q3 What is your estimated Cost of Equity*?
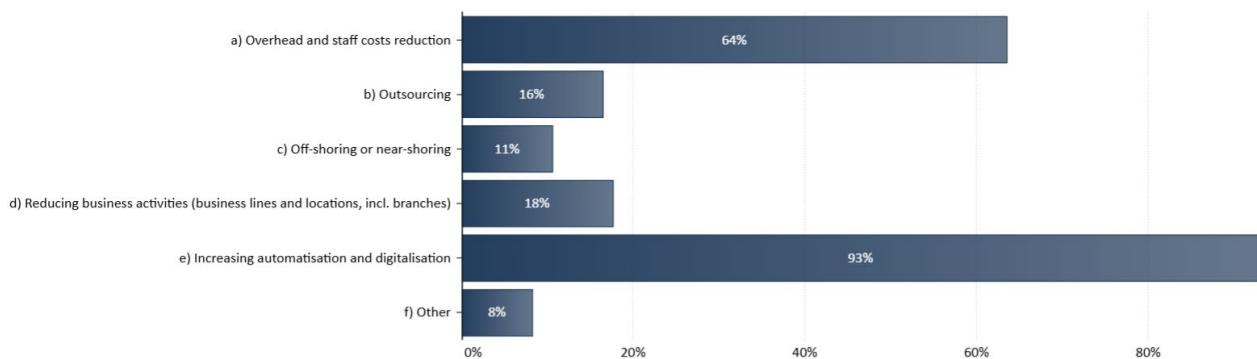
Question 3: Comparison with earlier results
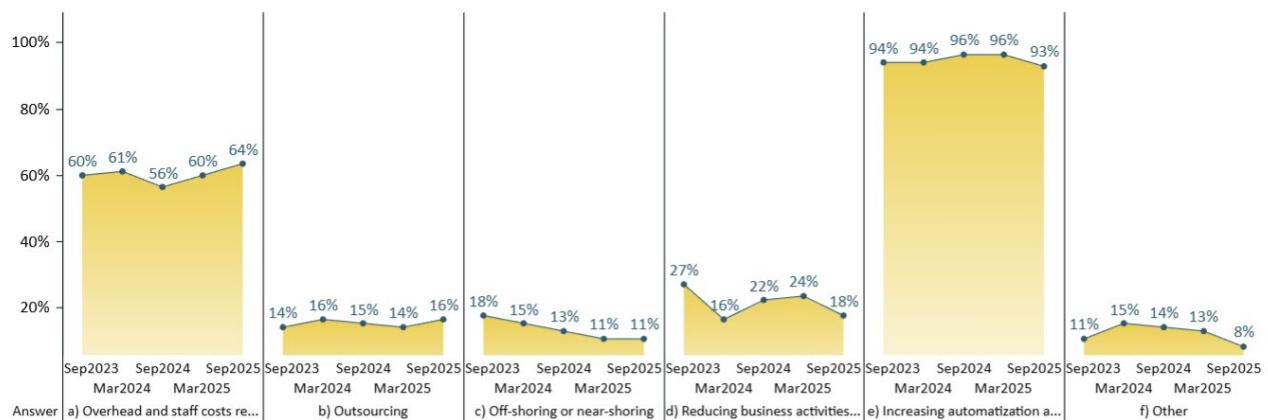
Question 4: Autumn 2025 results

Q4 Which measures are you primarily taking to reduce operating expenses / costs?
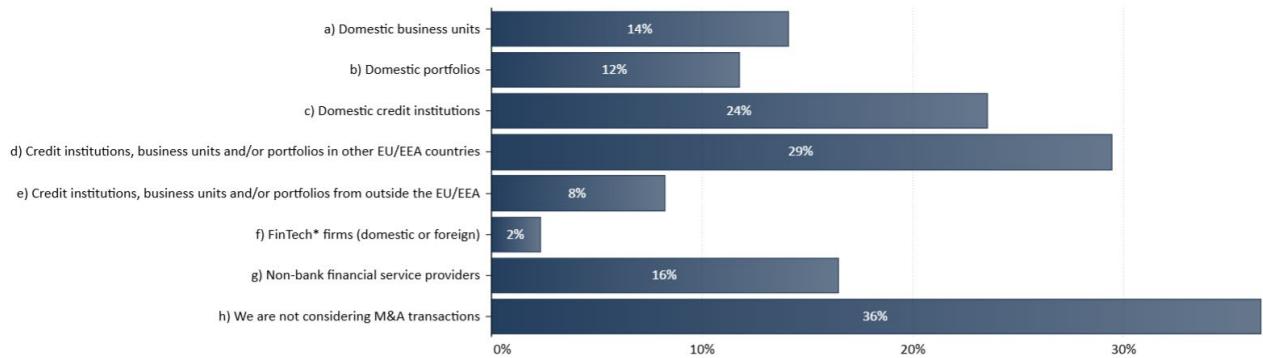

Question 4: Comparison with earlier results
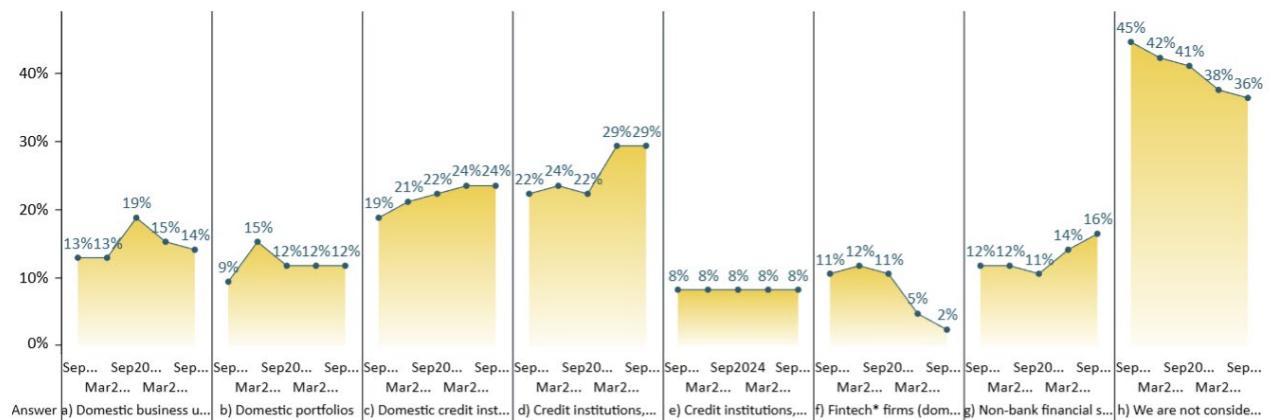
Question 5: Autumn 2025 results

Q5 Are you considering Mergers & Acquisitions (M&A) transactions with/of?

a) Domestic business units	14%
b) Domestic portfolios	12%
c) Domestic credit institutions	24%
d) Credit institutions, business units and/or portfolios in other EU/EEA countries	29%
e) Credit institutions, business units and/or portfolios from outside the EU/EEA	8%
f) FinTech* firms (domestic or foreign)	2%
g) Non-bank financial service providers	16%
h) We are not considering M&A transactions	36%
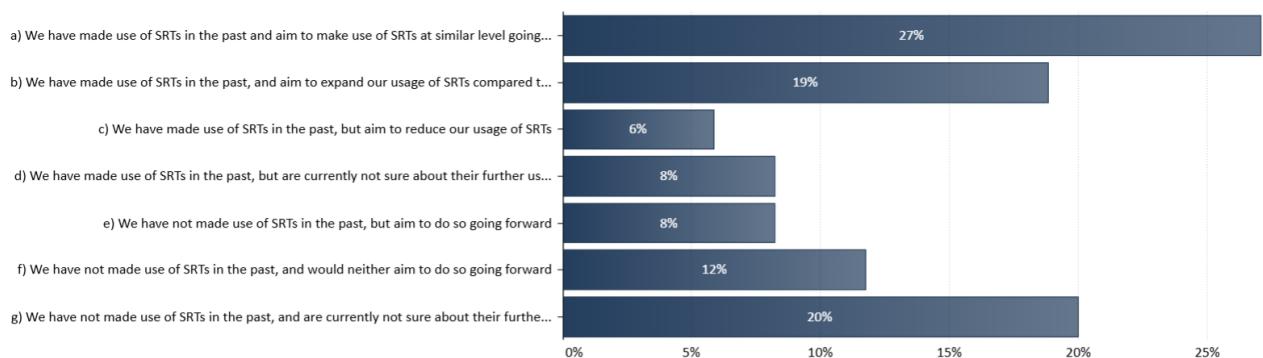
Question 5: comparison with earlier results
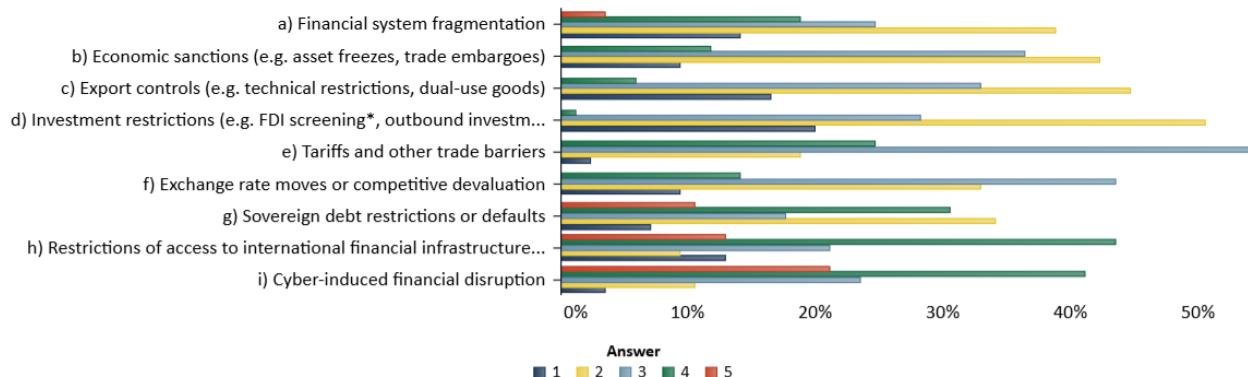
Question 6: Autumn 2025 results

Q6 Have you made use of significant risk transfers (SRT) in the past, and what are your SRT related plans for the future 6 to 12 months?

a) We have made use of SRTs in the past and aim to make use of SRTs at similar level going...	27%
b) We have made use of SRTs in the past, and aim to expand our usage of SRTs compared t...	19%
c) We have made use of SRTs in the past, but aim to reduce our usage of SRTs	6%
d) We have made use of SRTs in the past, but are currently not sure about their further us...	8%
e) We have not made use of SRTs in the past, but aim to do so going forward	8%
f) We have not made use of SRTs in the past, and would neither aim to do so going forward	12%
g) We have not made use of SRTs in the past, and are currently not sure about their furthe...	20%

Question 7: Autumn 2025 results

Q7 Please rate the possible impact of the following potential geoeconomic factors on your institution, based on your institutions exposure
(1 No impact or relevance and 5 - High impact):

Question 8: Autumn 2025 results
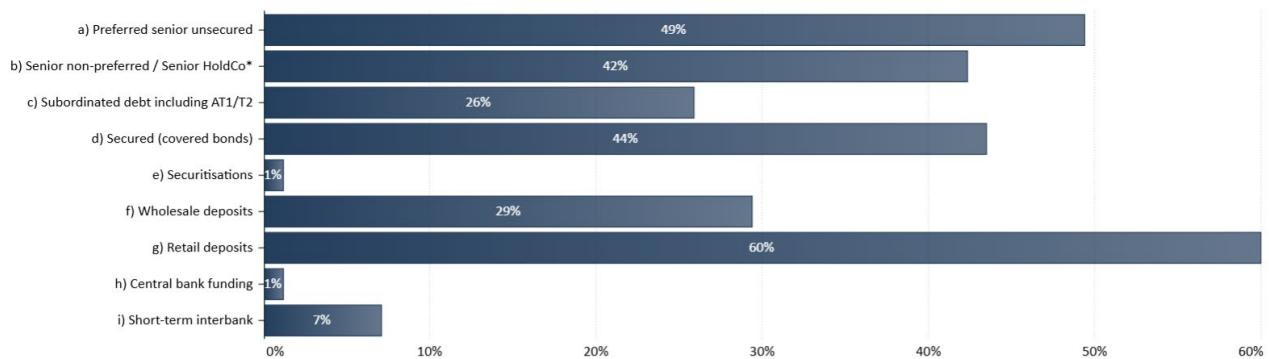
Q8 Please rate the level of expected implications that potential geoeconomic factors could have on your institution in the following areas?
(1 - No impact or relevance and 5 - High impact)
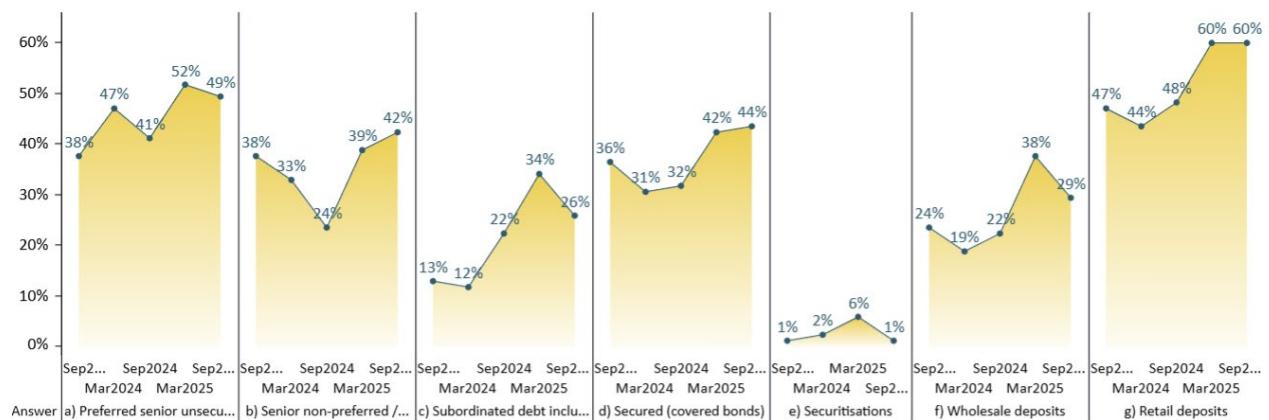
2. Funding / liquidity

Question 9: Autumn 2025 results

Q9 Which funding instruments do you intend to focus on in the next 12 months?
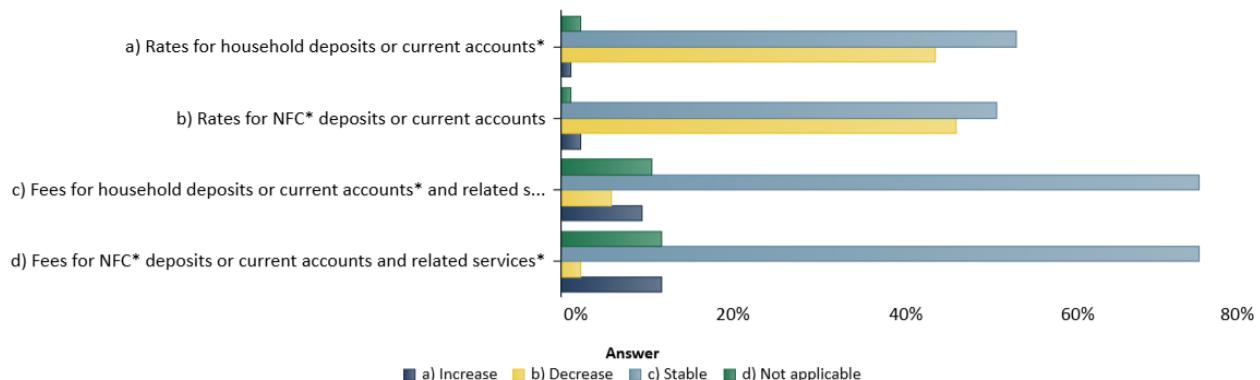
Question 9: comparison with earlier results
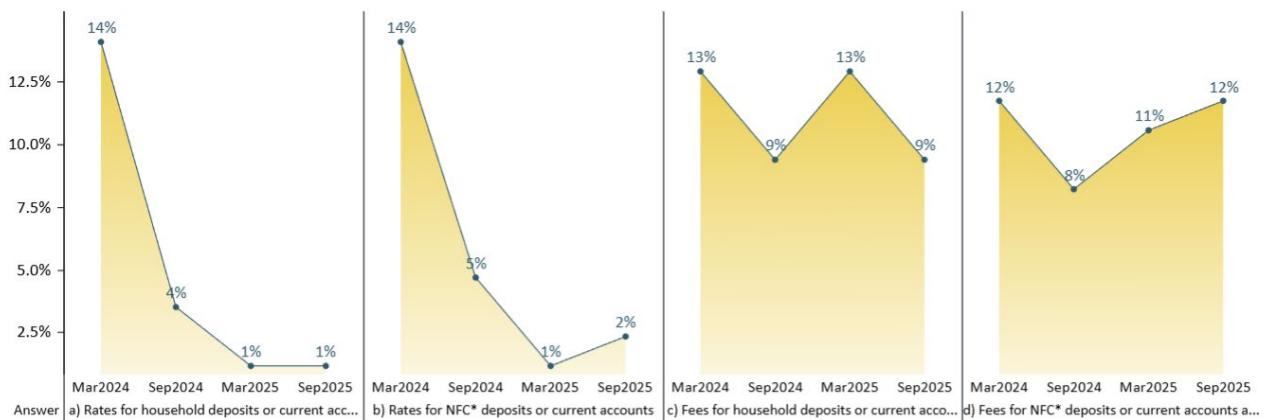
Question 10: Autumn 2025 results

Q10 Which of the following actions are you considering in relation to deposits (sight and term) and current accounts?
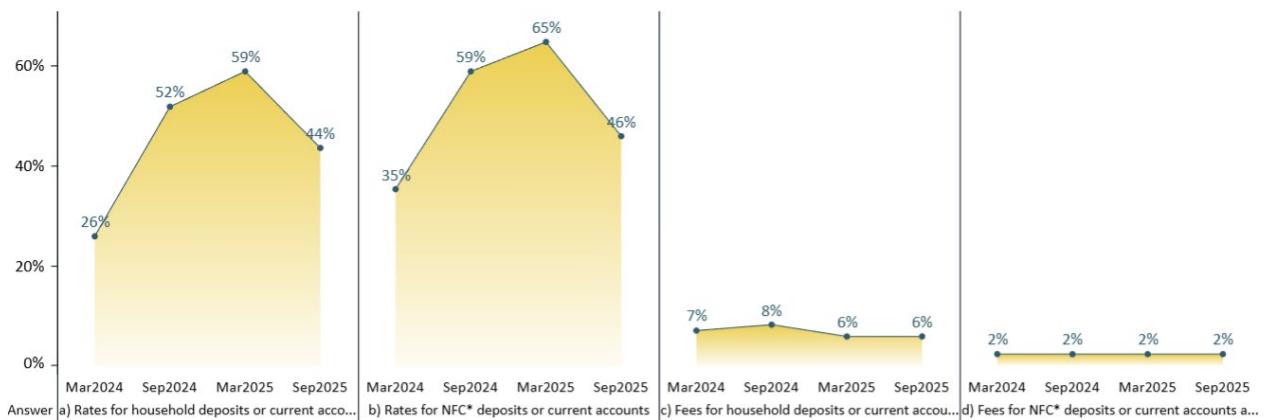
Question 10: comparison with earlier results
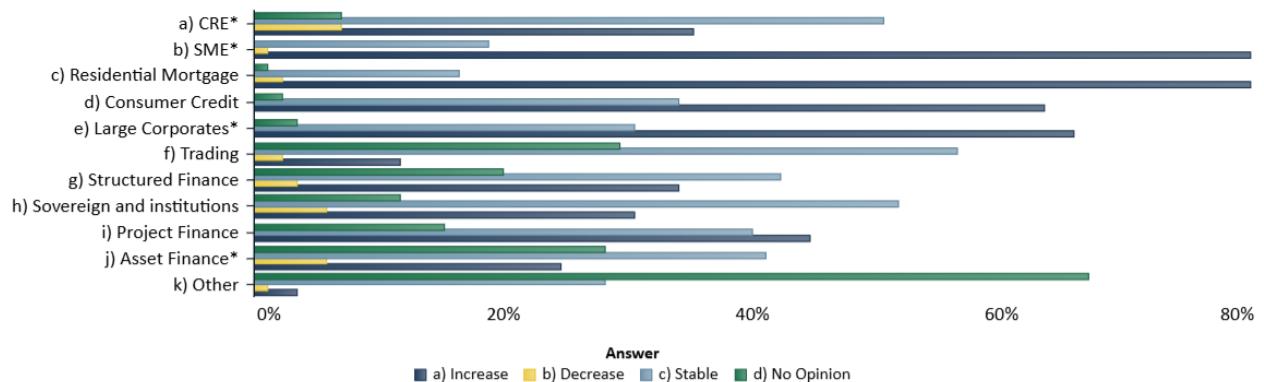
Increase

Decrease

3. Asset composition and quality
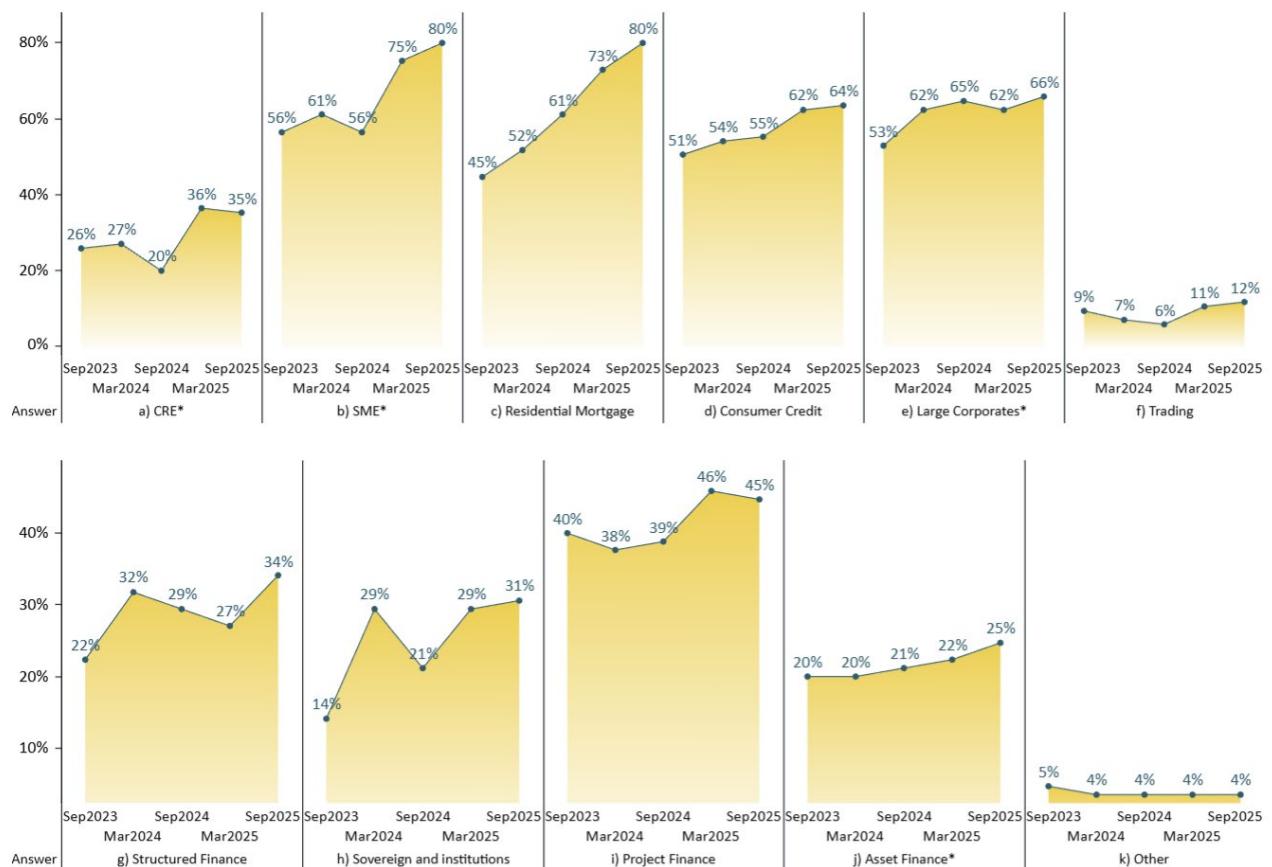
Question 11: Autumn 2025 results

Q11 Which portfolios do you plan to increase/decrease in volume during the next 12 months (on a net basis)?

Answer
- a) Increase
- b) Decrease
- c) Stable
- d) No Opinion
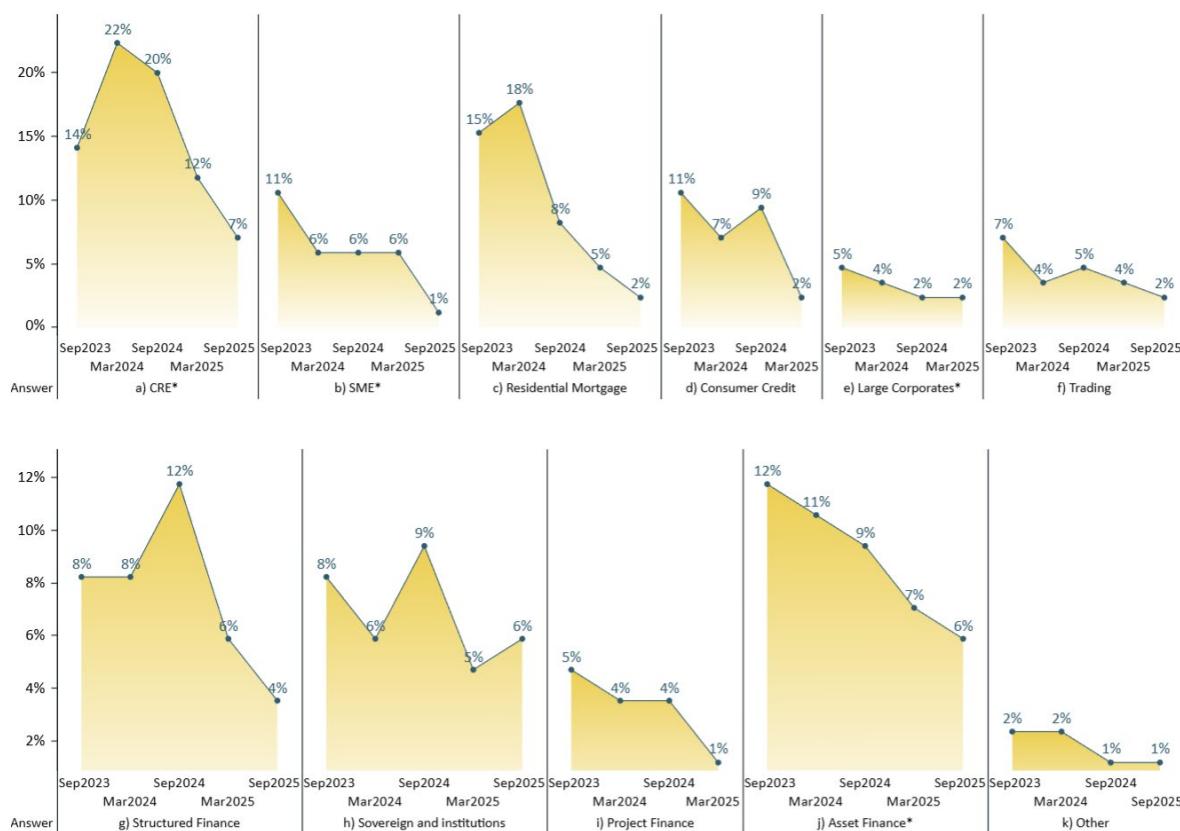
Question 11: comparison with earlier results

Increase

Decrease

Answer | a) CRE* | b) SME* | c) Residential Mortgage | d) Consumer Credit | e) Large Corporates* | f) Trading

Answer | g) Structured Finance | h) Sovereign and institutions | i) Project Finance | j) Asset Finance* | k) Other
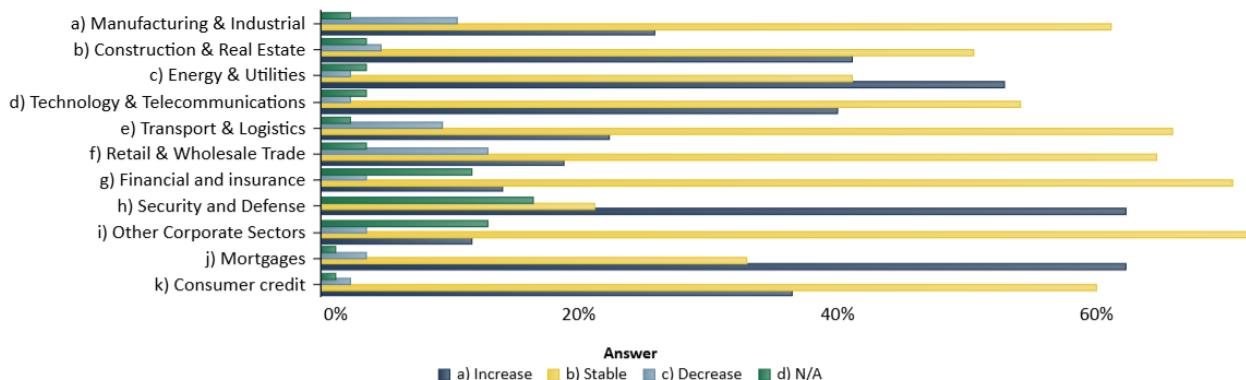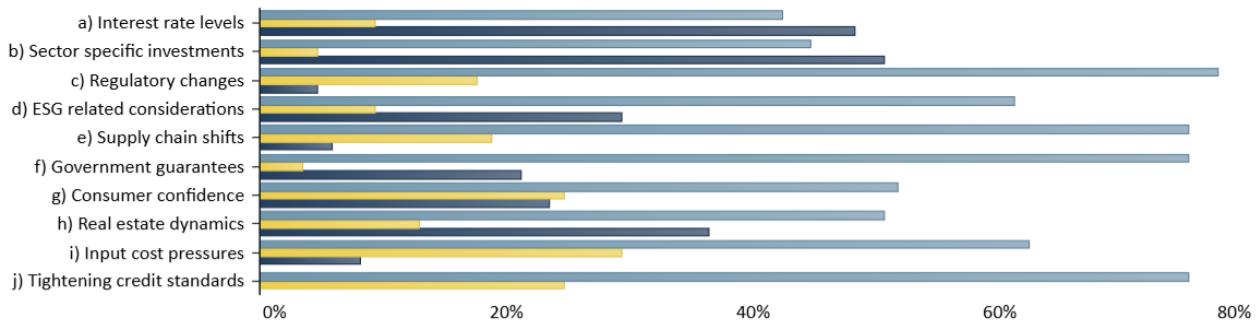
Question 12: Autumn 2025 results

Q12 How would you assess loan demand during the next 12 months across the following corporate and household sectors?

a) Manufacturing & Industrial
b) Construction & Real Estate
c) Energy & Utilities
d) Technology & Telecommunications
e) Transport & Logistics
f) Retail & Wholesale Trade
g) Financial and insurance
h) Security and Defense
i) Other Corporate Sectors
j) Mortgages
k) Consumer credit

Answer
a) Increase   b) Stable   c) Decrease   d) N/A
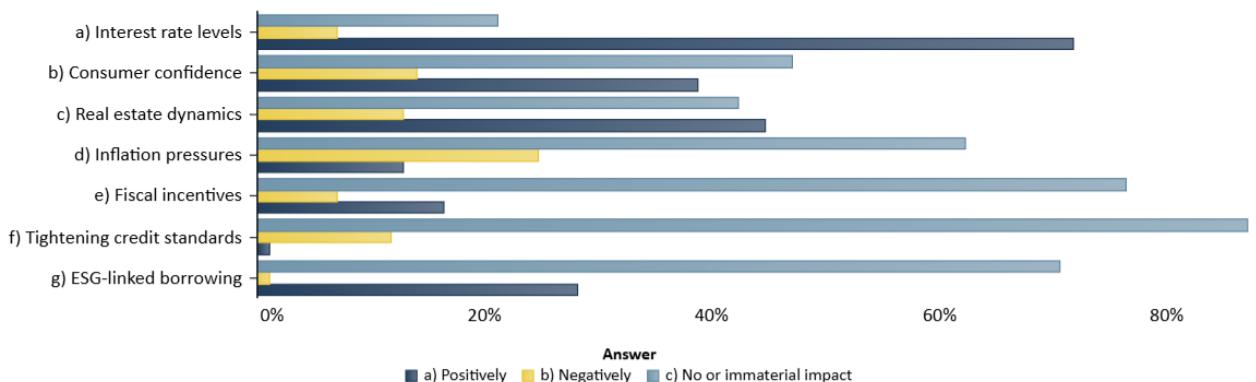
Question 13: Autumn 2025 results

Q13.1 How have the following factors currently affected (over the last 6 months) demand for corporate loans?

Answer
- a) Positively
- b) Negatively
- c) No or immaterial impact

Q13.2 How have the following factors currently affected (over the last 6 months) demand for household loans?

Answer
- a) Positively
- b) Negatively
- c) No or immaterial impact
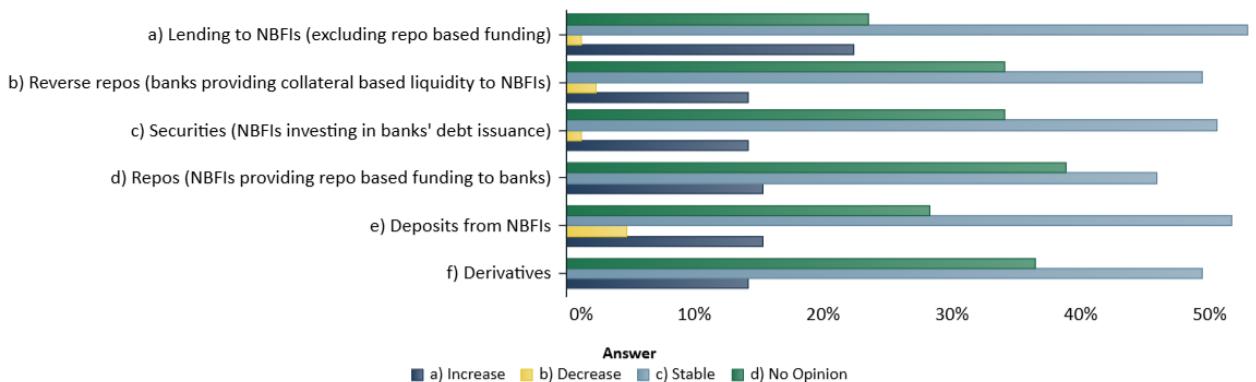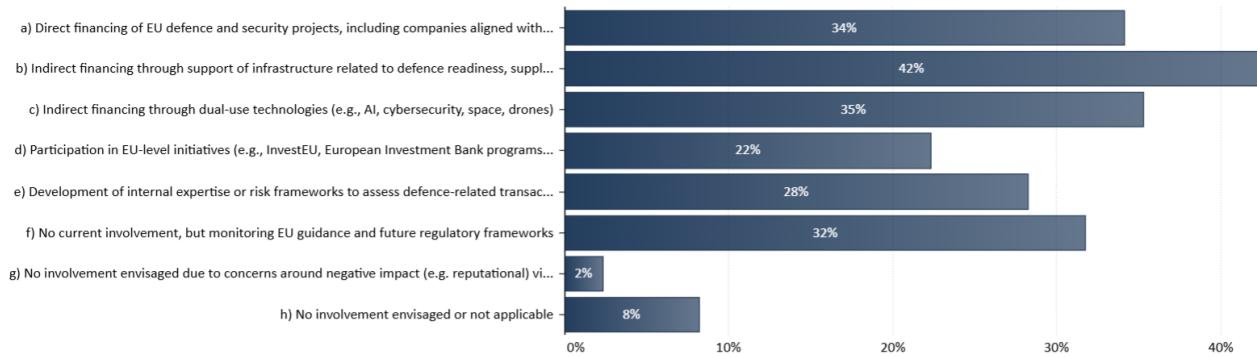
Question 14: Autumn 2025 results

Q14 How do you expect exposures (both asset and liabilitiy side) towards non-bank financial intermediaries (NBFIs) to develop in the next 6-12 months?

Answer
- a) Increase
- b) Decrease
- c) Stable
- d) No Opinion

13

Question 15: Autumn 2025 results

Q15 In light of the EU strategic priority for Security and Defence (Readiness 2030), how does your institution plan to support EU defence and security objectives?

|	
a) Direct financing of EU defence and security projects, including companies aligned with...	34%
b) Indirect financing through support of infrastructure related to defence readiness, suppl...	42%
c) Indirect financing through dual-use technologies (e.g., AI, cybersecurity, space, drones)	35%
d) Participation in EU-level initiatives (e.g., InvestEU, European Investment Bank programs...	22%
e) Development of internal expertise or risk frameworks to assess defence-related transac...	28%
f) No current involvement, but monitoring EU guidance and future regulatory frameworks	32%
g) No involvement envisaged due to concerns around negative impact (e.g. reputational) vi...	2%
h) No involvement envisaged or not applicable	8%

Question 16: Autumn 2025 results
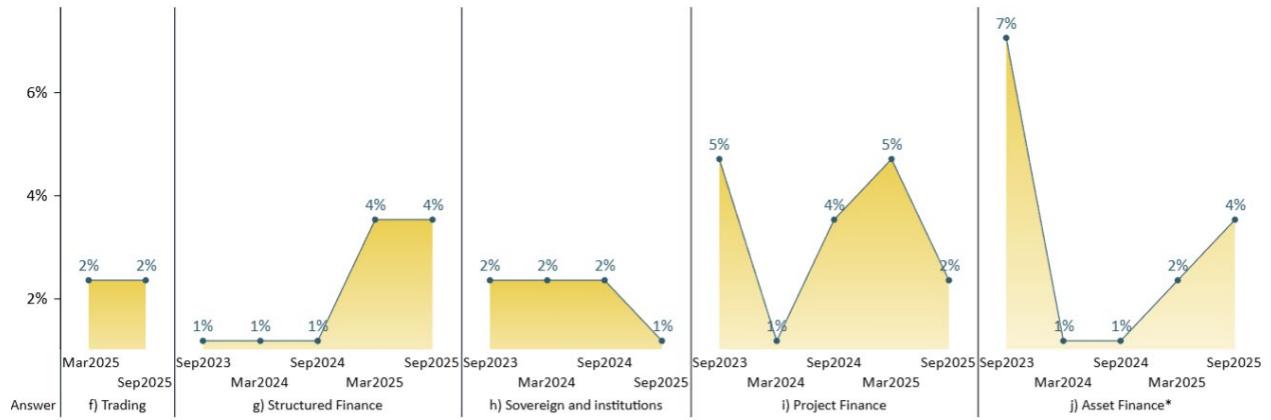
Q16 Which portfolios do you expect to improve/deteriorate in asset quality in the next 12 months?

Answer
■ a) Improve ■ b) Deteriorate ■ c) Stable ■ d) No Opinion

(portfolios: a) CRE*, b) SME*, c) Residential Mortgage, d) Consumer Credit, e) Large Corporates*, f) Trading, g) Structured Finance, h) Sovereign and institutions, i) Project Finance, j) Asset Finance*, k) Other)
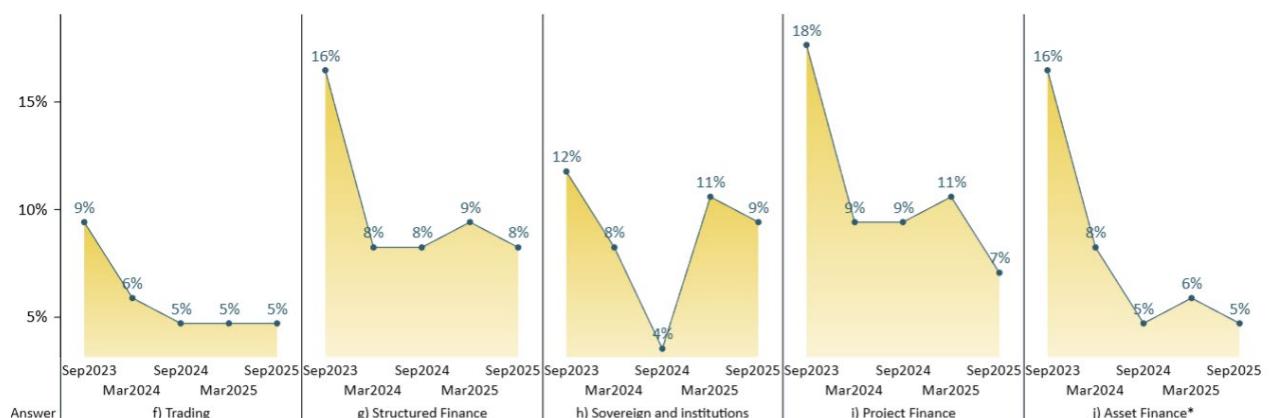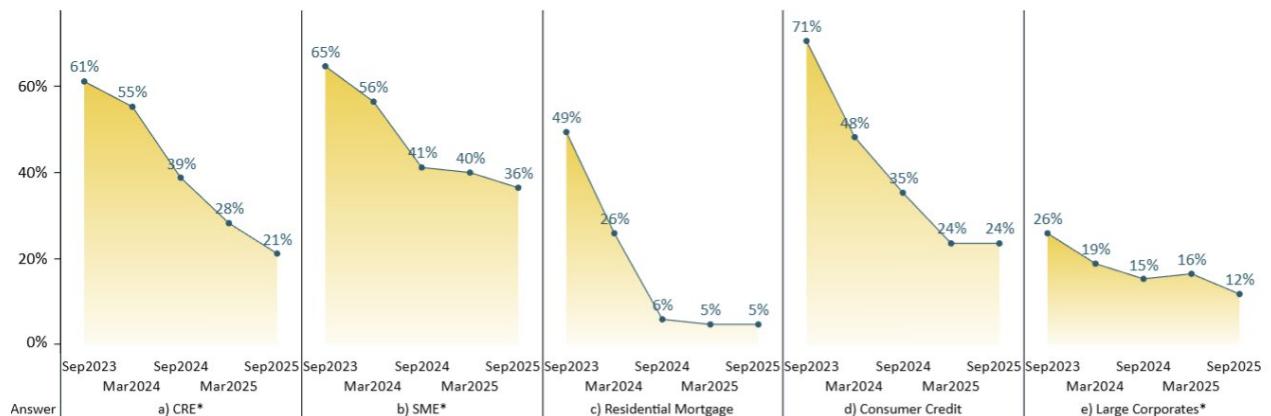
Question 16: comparison with earlier results

Improve

Answer	a) CRE*	b) SME*	c) Residential Mortgage	d) Consumer Credit	e) Large Corporates*
Sep2023	1%	4%	1%	2%	5%
Mar2024	1%	1%	5%	6%	1%
Sep2024	4%	2%	13%	6%	5%
Mar2025	7%	6%	14%	9%	7%
Sep2025	8%	5%	19%	11%	9%

f) Trading — Mar2025 2%, Sep2025 2%

g) Structured Finance — Sep2023 1%, Mar2024 1%, Sep2024 1%, Mar2025 4%, Sep2025 4%

h) Sovereign and institutions — Sep2023 2%, Mar2024 2%, Sep2024 2%, Sep2025 1%

i) Project Finance — Sep2023 5%, Mar2024 1%, 4%, Mar2025 5%, Sep2025 2%

j) Asset Finance* — Sep2023 7%, 1%, Sep2024 1%, 2%, Sep2025 4%

Deteriorate

a) CRE* — Sep2023 61%, 55%, Mar2024 39%, 28%, Sep2025 21%

b) SME* — Sep2023 65%, 56%, 41%, 40%, Sep2025 36%

c) Residential Mortgage — Sep2023 49%, 26%, 6%, 5%, 5%

d) Consumer Credit — Sep2023 71%, 48%, 35%, 24%, 24%

e) Large Corporates* — Sep2023 26%, 19%, 15%, 16%, 12%

f) Trading — Sep2023 9%, 6%, 5%, 5%, 5%

g) Structured Finance — Sep2023 16%, 8%, 8%, 9%, 8%

h) Sovereign and institutions — Sep2023 12%, 8%, 4%, 11%, 9%

i) Project Finance — Sep2023 18%, 9%, 9%, 11%, 7%

j) Asset Finance* — Sep2023 16%, 8%, 5%, 6%, 5%

Question 17: Autumn 2025 results

Q17 What is your Cost of Risk* estimation for the current financial year?
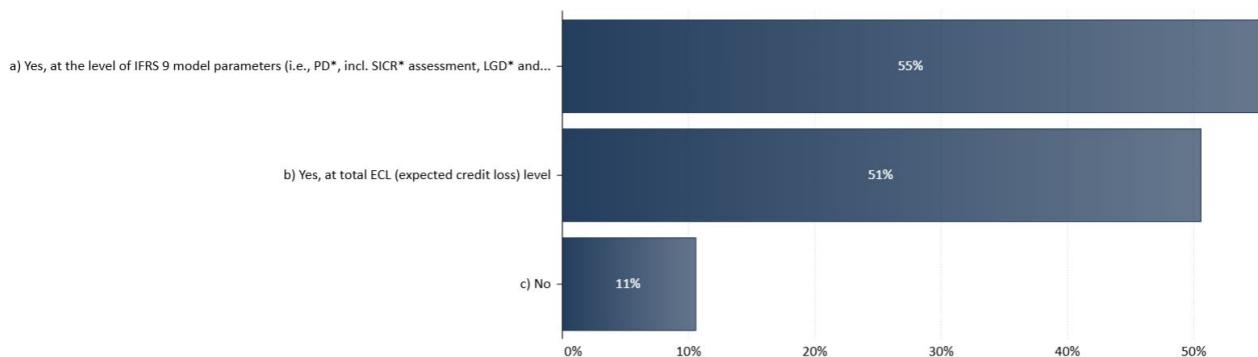

Question 17: comparison with earlier results
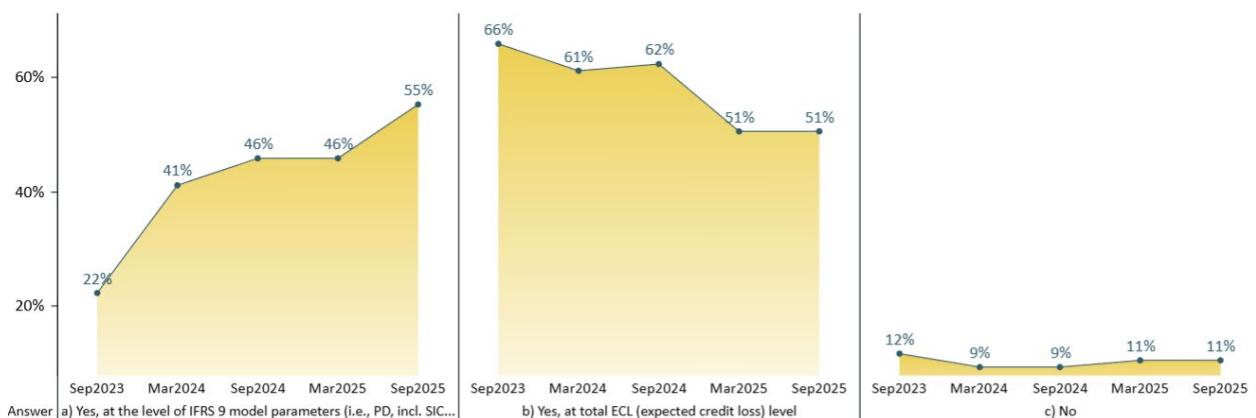
## Question 18: Autumn 2025 results
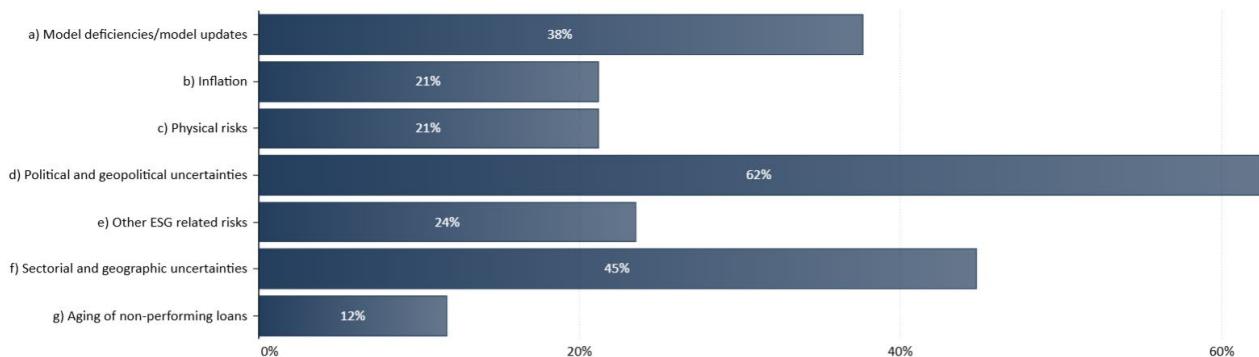
Q18 Do you have any provisioning overlays in place?

## Question 18: comparison with earlier results
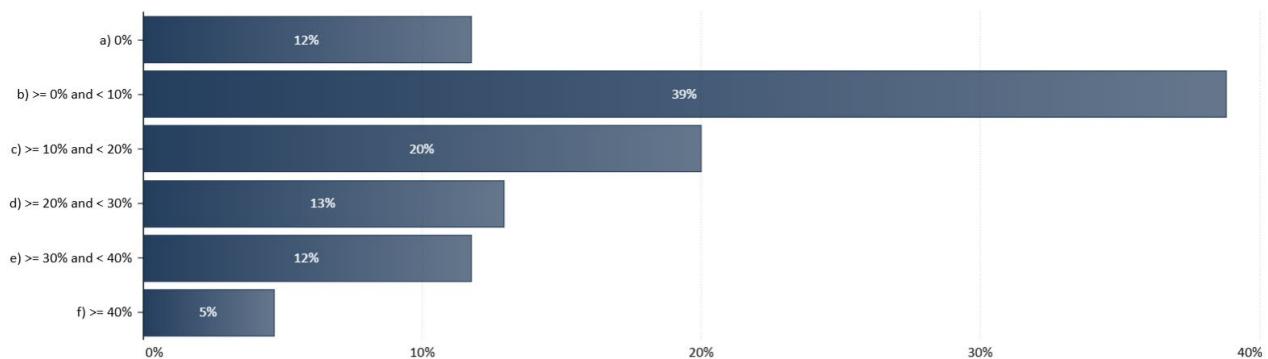
Q18.1 If you selected a) or b), which factors are the overlays associated to?


Question 19: Autumn 2025 results

Q19 Which is the proportion of the total Expected credit loss (ECL) amount that is recognised via provisioning overlays?
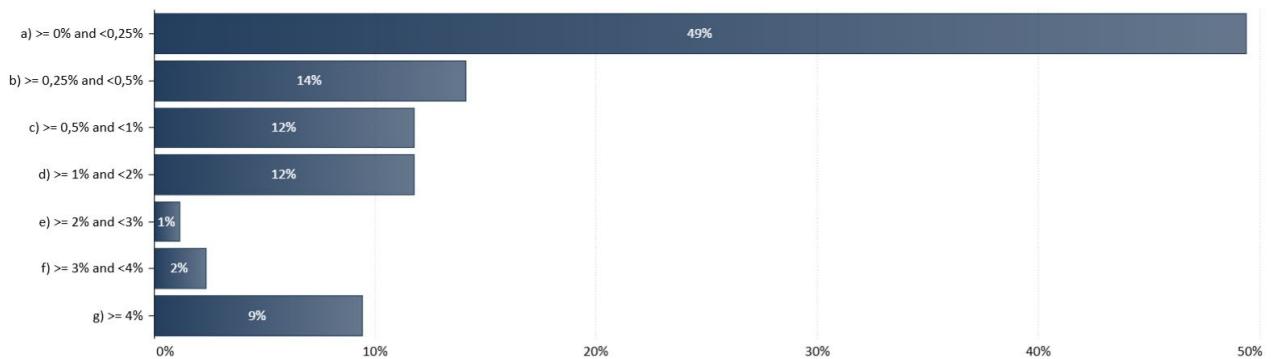
Question 19: comparison with earlier results
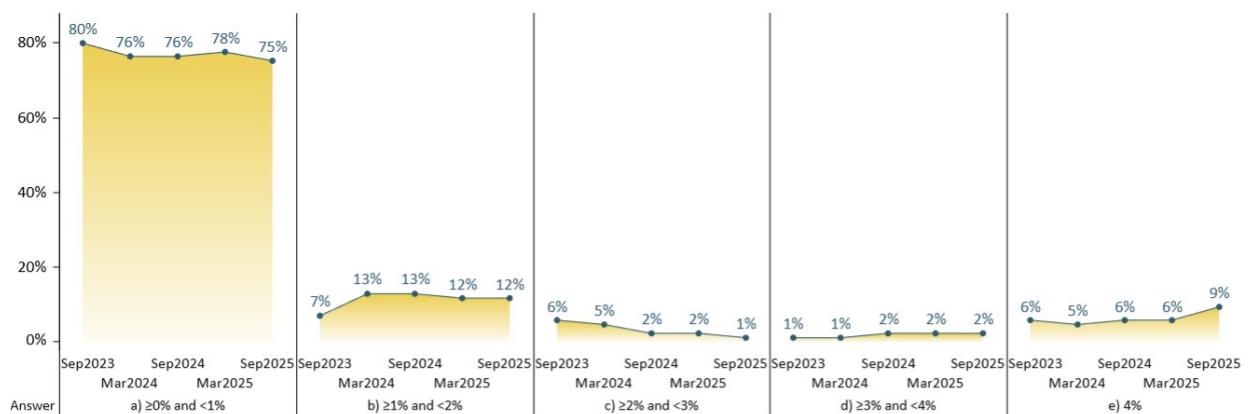
4. Conduct, Reputational and Operational Risk

Question 20: Autumn 2025 results

Q20 Over the past three years, how much has your firm paid out in the form of compensation, redress, litigation and similar payments (as percentage of equity)?

Question 20: comparison with earlier results
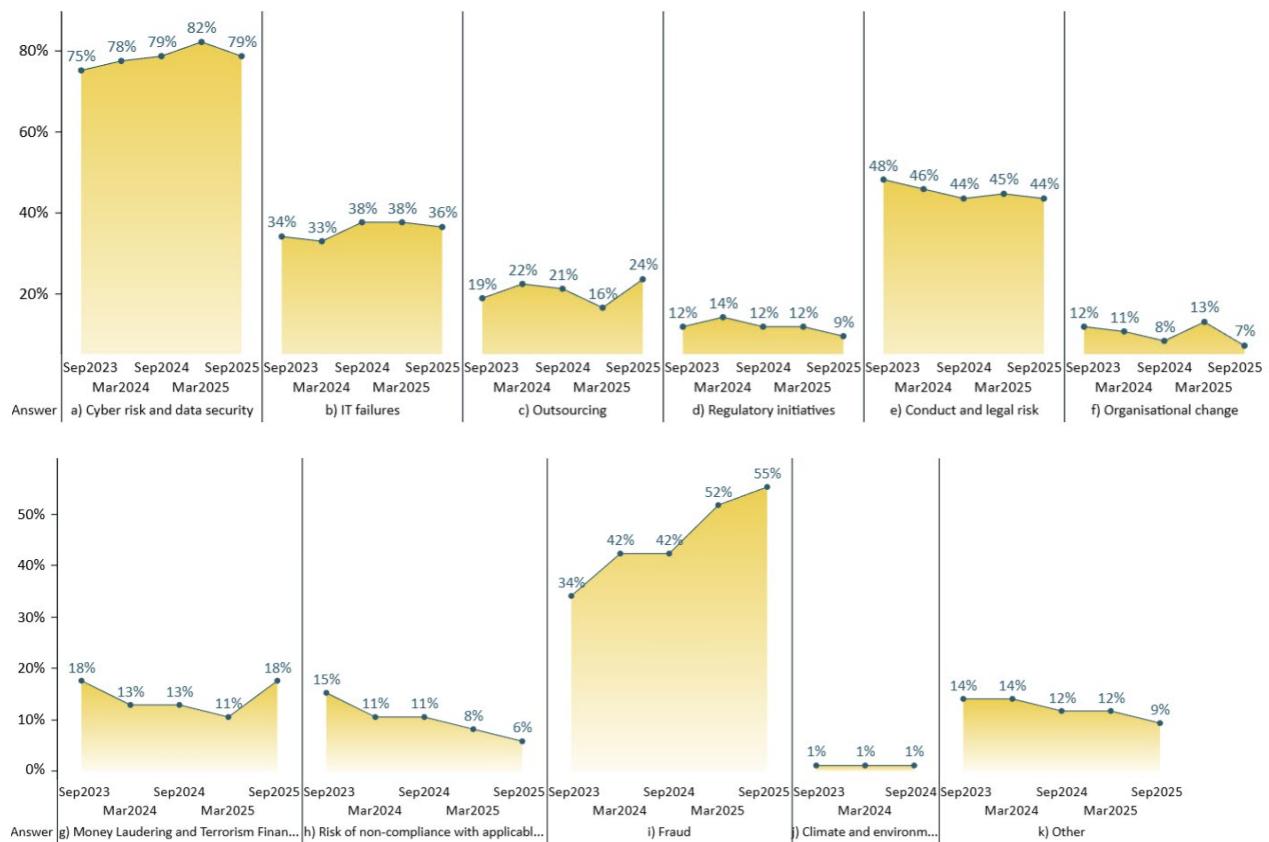
## Question 21: Autumn 2025 results

Q21 Which are the main drivers of operational risk?
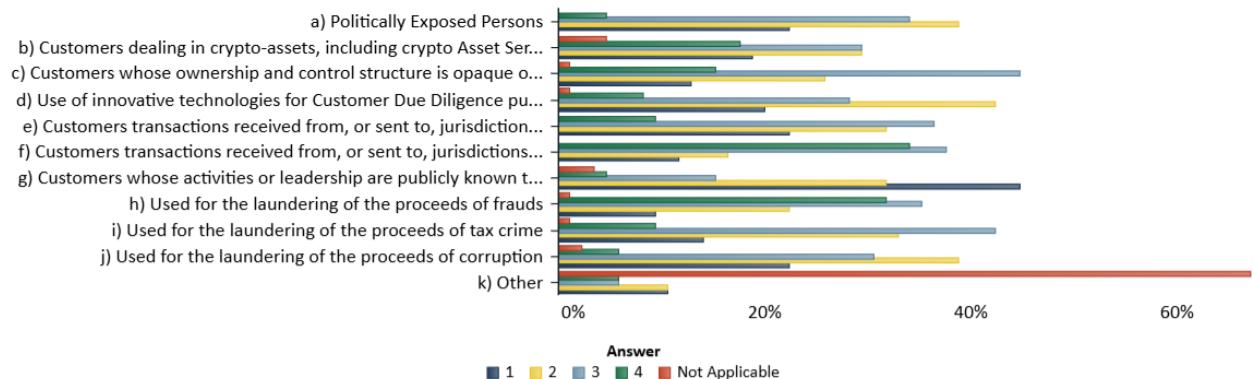
Question 21: comparison with earlier results
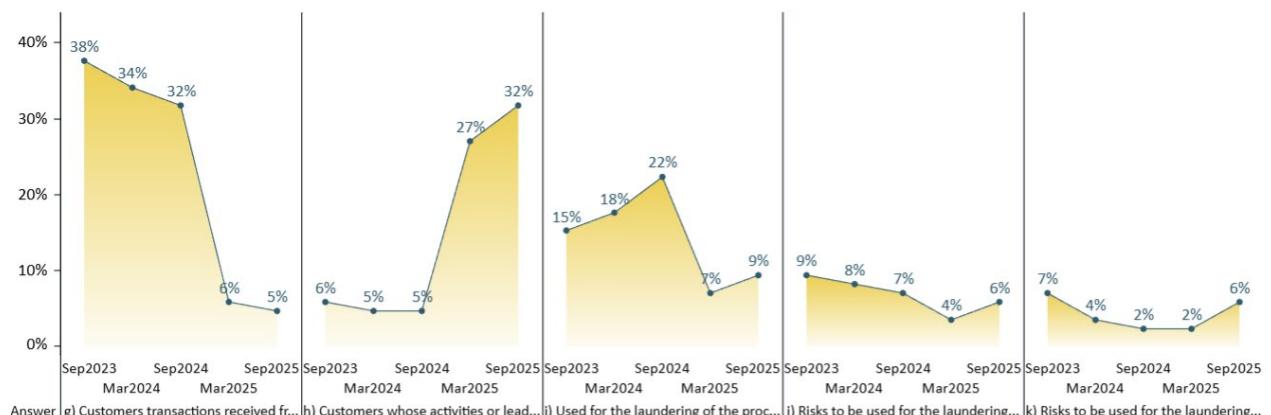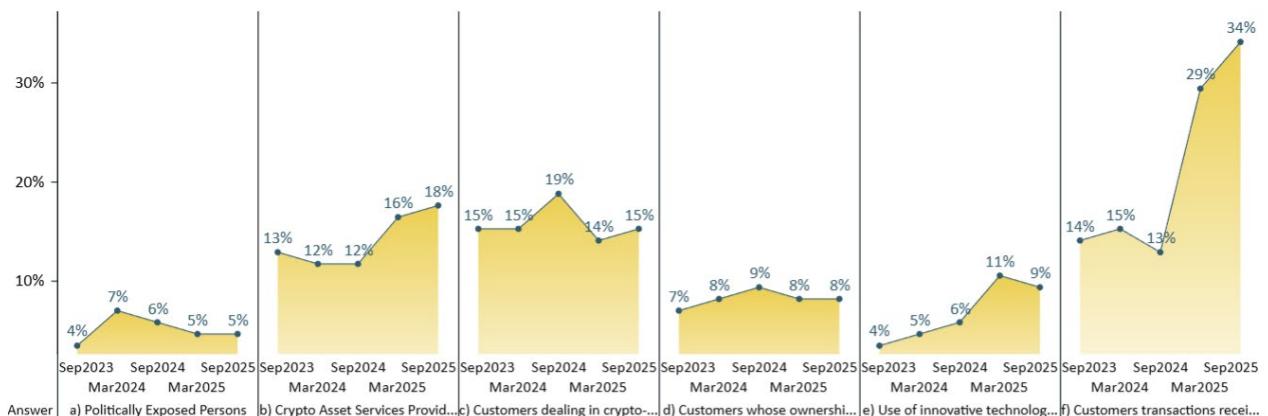
Question 22: Autumn 2025 results

Q22 Which key Money Laundering and Terrorism Financing risks do you expect to face over the coming 6 to 12 months? (1 - Low Significance and 4 - High Significance)
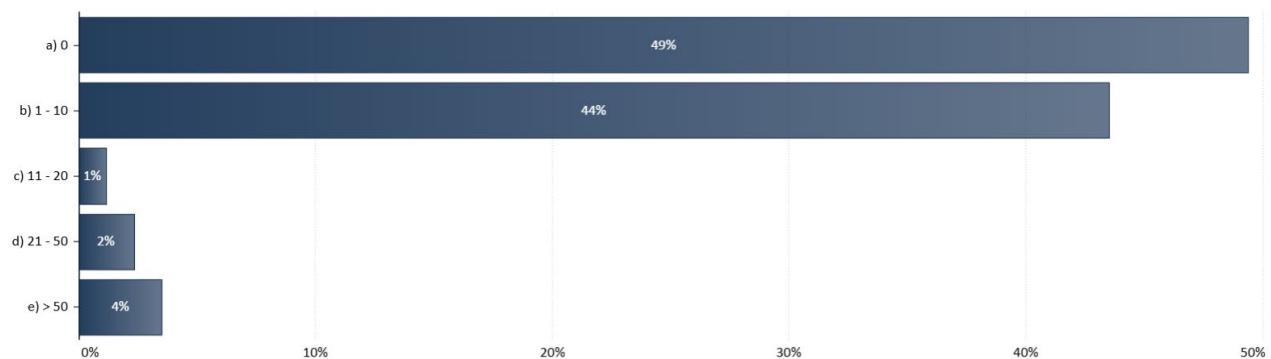
Question 22: comparison with earlier results

High Significance
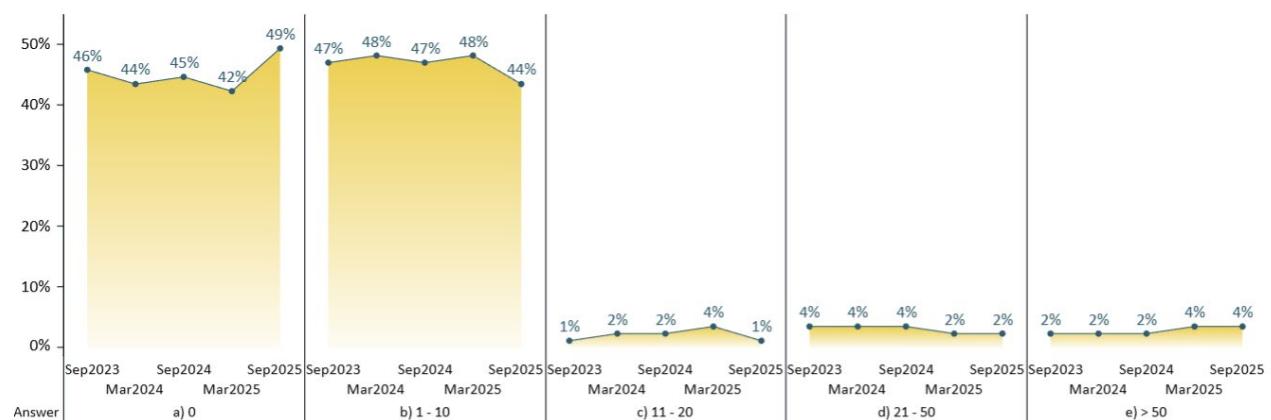
Question 23: Autumn 2025 results
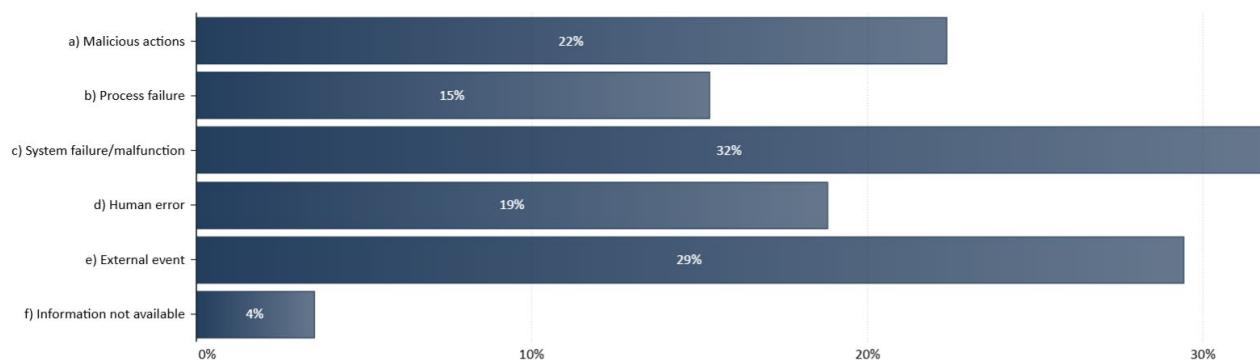
Q23.1 How many cyber-attacks that resulted or could have potentially resulted in a major ICT-related incident* have you faced in the first half of 2025 (considering the highest level of consolidation)?

Question 23: comparison with earlier results
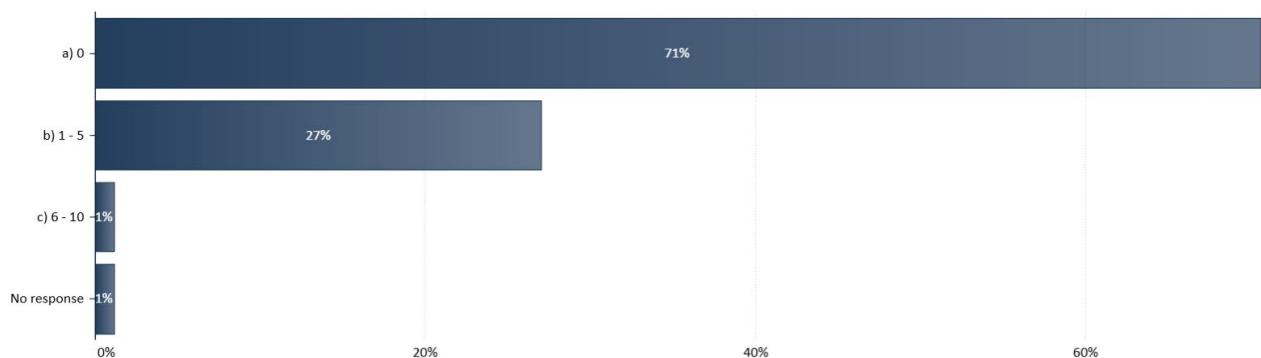
Q23.2 What kind of major ICT-related incidents did you experience in the in the first half of 2025, split by the following root causes of the incidents?
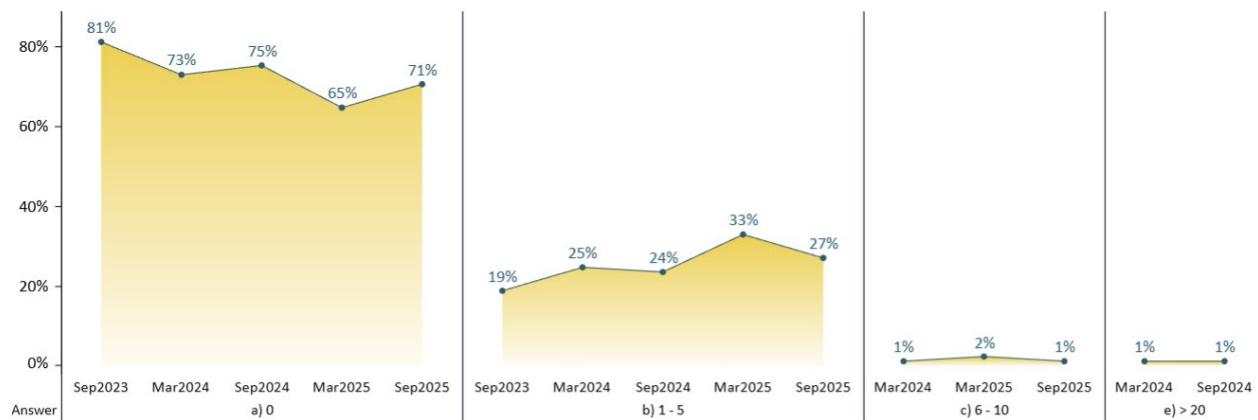
Question 24: Autumn 2025 results
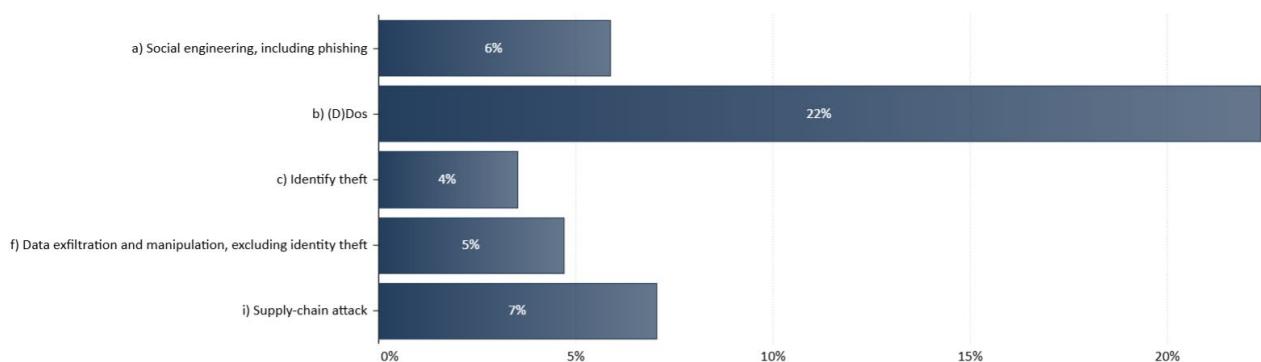
Q24.1 How many successful cyber-attacks resulting in major ICT-related incidents* have you faced in the first half of 2025 (considering the highest level of consolidation)?

Question 24: comparison with earlier results
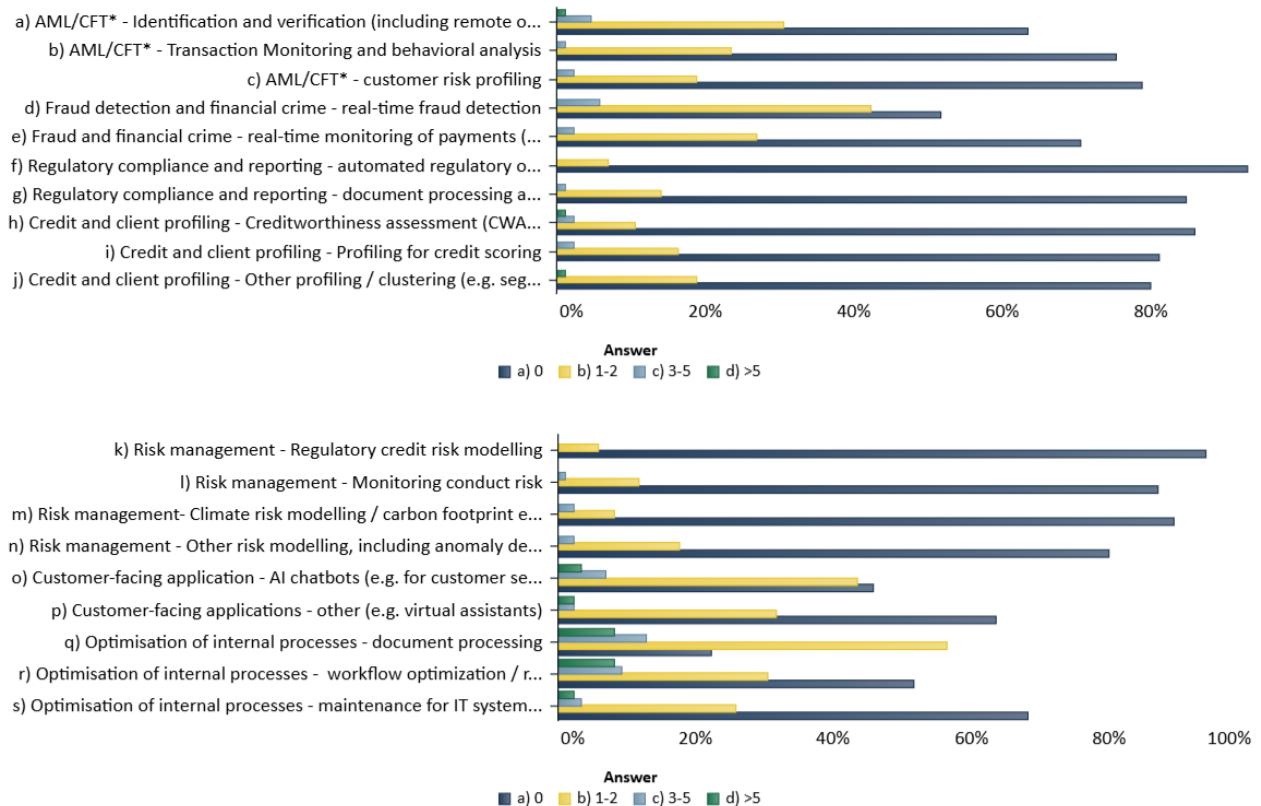
Q24.2 What kind of threats and techniques were applied by the threat actor for the successful cyber-attacks resulting in major ICT-related incidents ?

5. FinTech
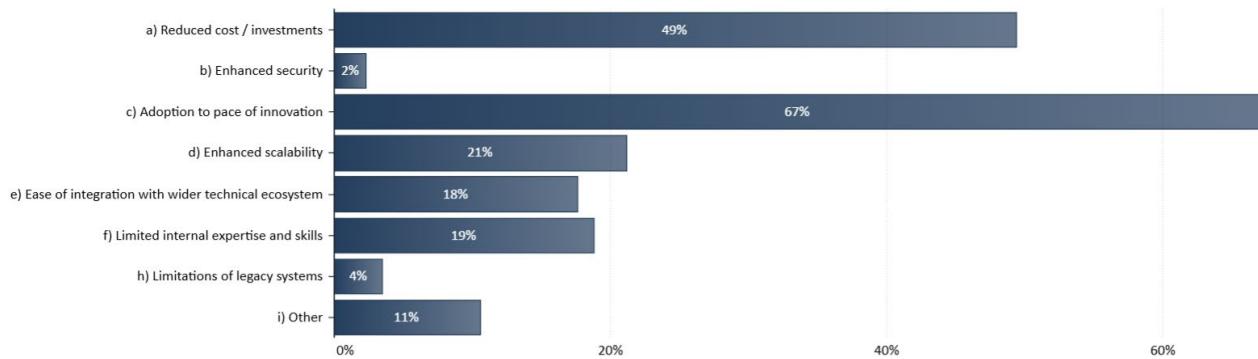
Question 25: Autumn 2025 results

Q25 How many ICT third-party providers provide AI systems or AI models to your bank for each of the following use cases? 0= in-house (including group subsidiaries) development of AI systems or AI models

Answer
■ a) 0   ■ b) 1-2   ■ c) 3-5   ■ d) >5

Answer
■ a) 0   ■ b) 1-2   ■ c) 3-5   ■ d) >5
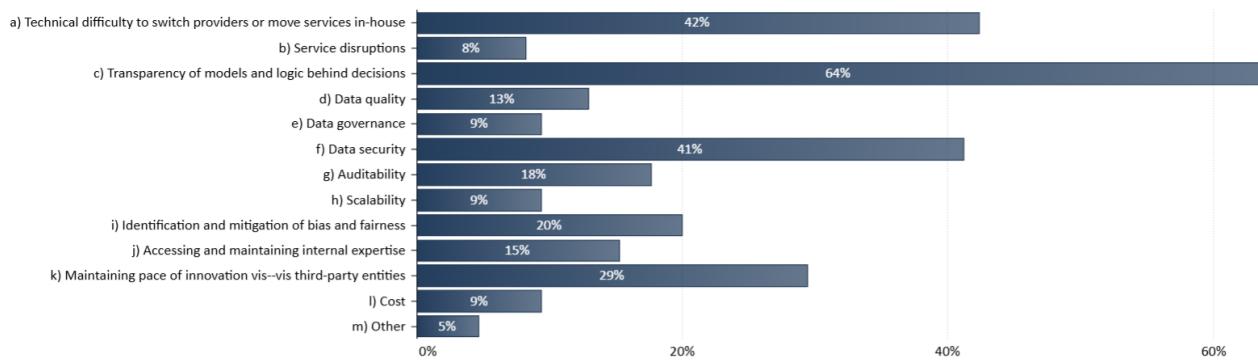
Question 26: Autumn 2025 results

Q26 Please indicate the top 2 reasons why your bank uses third-party entities in relation to AI systems and models

- a) Reduced cost / investments — 49%
- b) Enhanced security — 2%
- c) Adoption to pace of innovation — 67%
- d) Enhanced scalability — 21%
- e) Ease of integration with wider technical ecosystem — 18%
- f) Limited internal expertise and skills — 19%
- h) Limitations of legacy systems — 4%
- i) Other — 11%
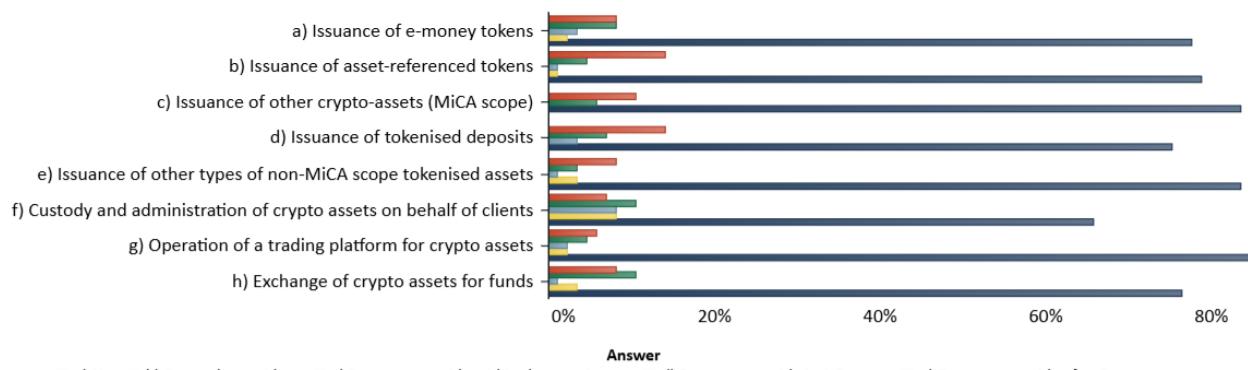
Question 27: Autumn 2025 results

Q27 Please indicate the top 3 challenges your bank faces in mitigating third-party dependency risks in relation to AI systems and models

| Challenge	%
a) Technical difficulty to switch providers or move services in-house	42%
b) Service disruptions	8%
c) Transparency of models and logic behind decisions	64%
d) Data quality	13%
e) Data governance	9%
f) Data security	41%
g) Auditability	18%
h) Scalability	9%
i) Identification and mitigation of bias and fairness	20%
j) Accessing and maintaining internal expertise	15%
k) Maintaining pace of innovation vis--vis third-party entities	29%
l) Cost	9%
m) Other	5%
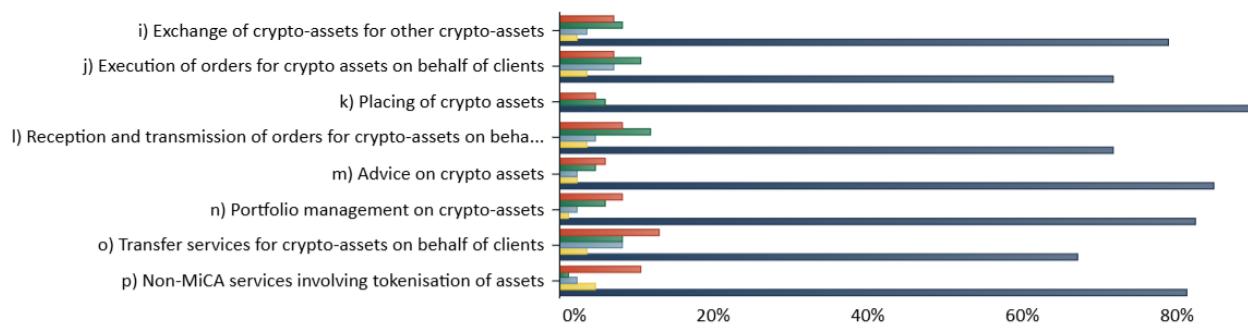
Question 28: Autumn 2025 results

Q28 Are you providing, or do you expect to provide any of the following crypto-asset products and services to retail or wholesale clients within the next years?


a) Issuance of e-money tokens
b) Issuance of asset-referenced tokens
c) Issuance of other crypto-assets (MiCA scope)
d) Issuance of tokenised deposits
e) Issuance of other types of non-MiCA scope tokenised assets
f) Custody and administration of crypto assets on behalf of clients
g) Operation of a trading platform for crypto assets
h) Exchange of crypto assets for funds

Answer
■ a) No   ■ b) Currently providing   ■ c) Expect to provide within the next 1 year   ■ d) Expect to provide in 1-2 years   ■ e) Expect to provide after 2 years or more

i) Exchange of crypto-assets for other crypto-assets
j) Execution of orders for crypto assets on behalf of clients
k) Placing of crypto assets
l) Reception and transmission of orders for crypto-assets on beha...
m) Advice on crypto assets
n) Portfolio management on crypto-assets
o) Transfer services for crypto-assets on behalf of clients
p) Non-MiCA services involving tokenisation of assets
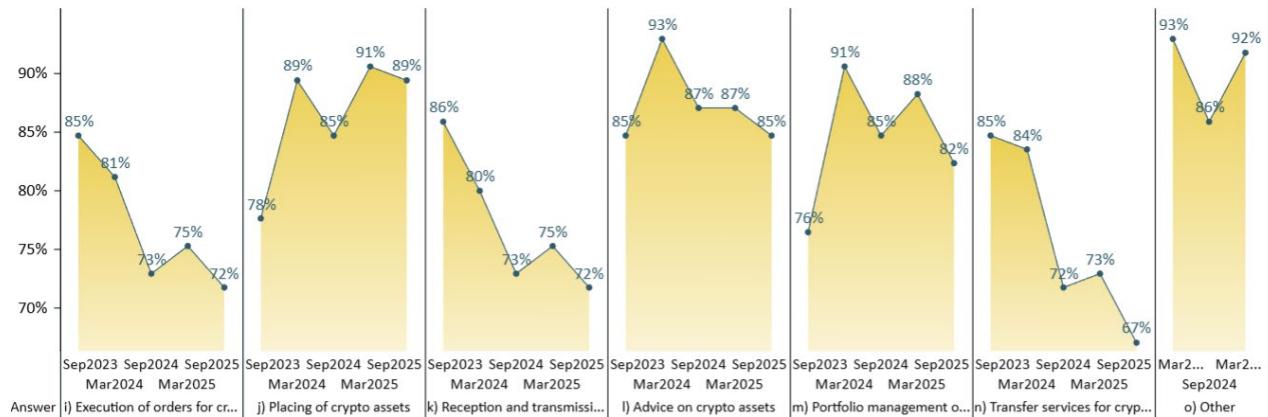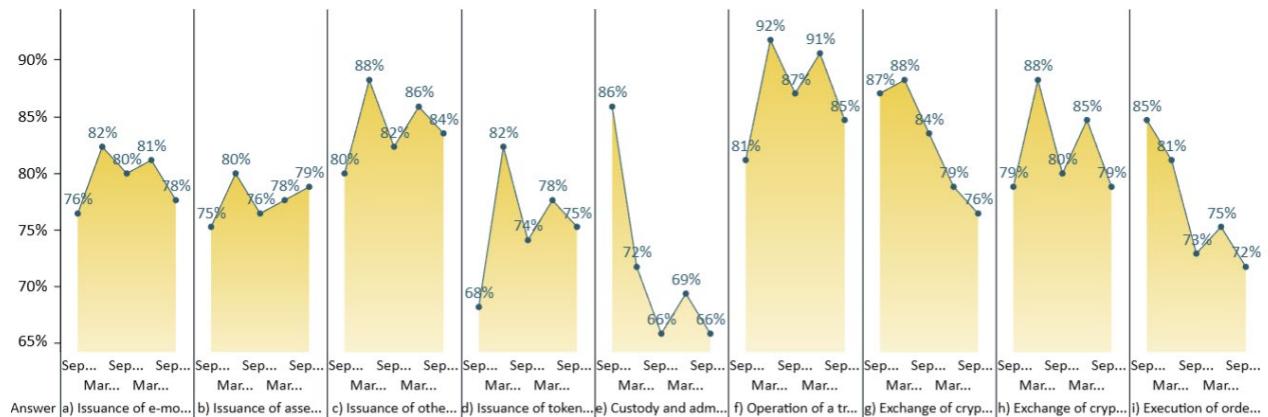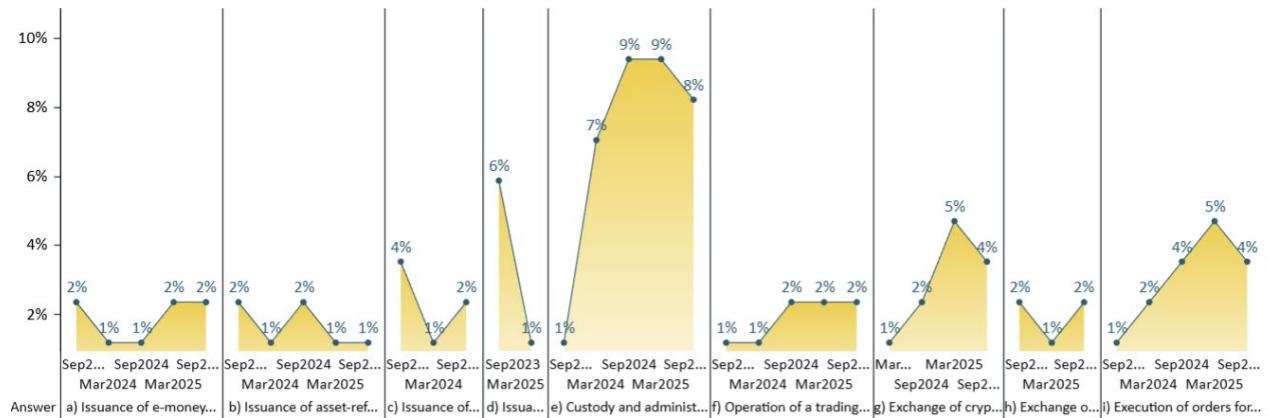
Answer
■ a) No   ■ b) Currently providing   ■ c) Expect to provide within the next 1 year   ■ d) Expect to provide in 1-2 years   ■ e) Expect to provide after 2 years or more
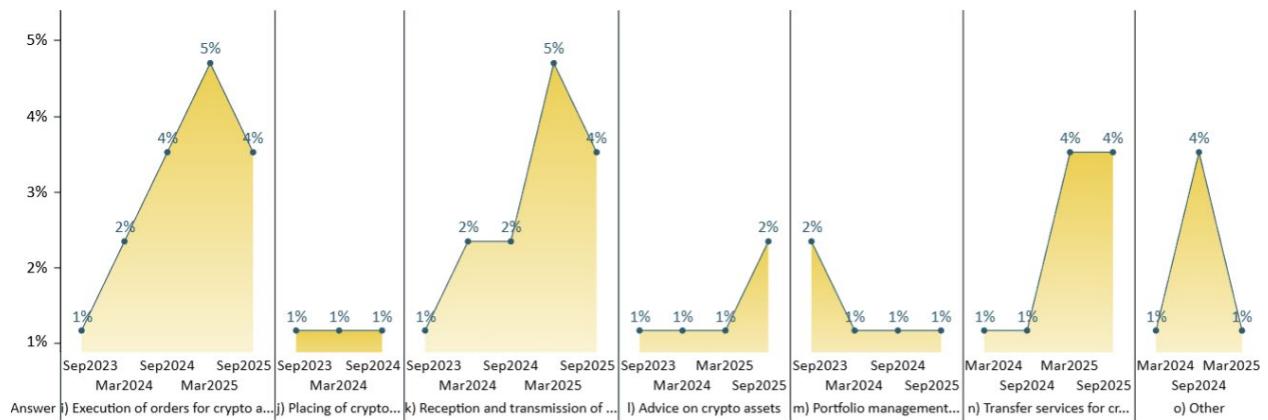
Question 28: comparison with earlier results

No

| Answer | a) Issuance of e-mo... | b) Issuance of asse... | c) Issuance of othe... | d) Issuance of token... | e) Custody and adm... | f) Operation of a tr... | g) Exchange of cryp... | h) Exchange of cryp... | i) Execution of orde... |

| Answer | i) Execution of orders for cr... | j) Placing of crypto assets | k) Reception and transmissi... | l) Advice on crypto assets | m) Portfolio management o... | n) Transfer services for cryp... | o) Other |

Currently providing

| Answer | a) Issuance of e-money... | b) Issuance of asset-ref... | c) Issuance of... | d) Issua... | e) Custody and administ... | f) Operation of a trading... | g) Exchange of cryp... | h) Exchange o... | i) Execution of orders for... |

Answer i) Execution of orders for crypto a... | j) Placing of crypto... | k) Reception and transmission of ... | l) Advice on crypto assets | m) Portfolio management... | n) Transfer services for cr... | o) Other

6. Environmental Social and Governance (ESG) Finance

Question 29: Autumn 2025 results

Q29 Which of the following loans, if any, are you offering to your clients? Please note the differentiation between proceeds-based and performance-based products, as to avoid double counting. Please avoid double counting of products already included under other options presented in the question.
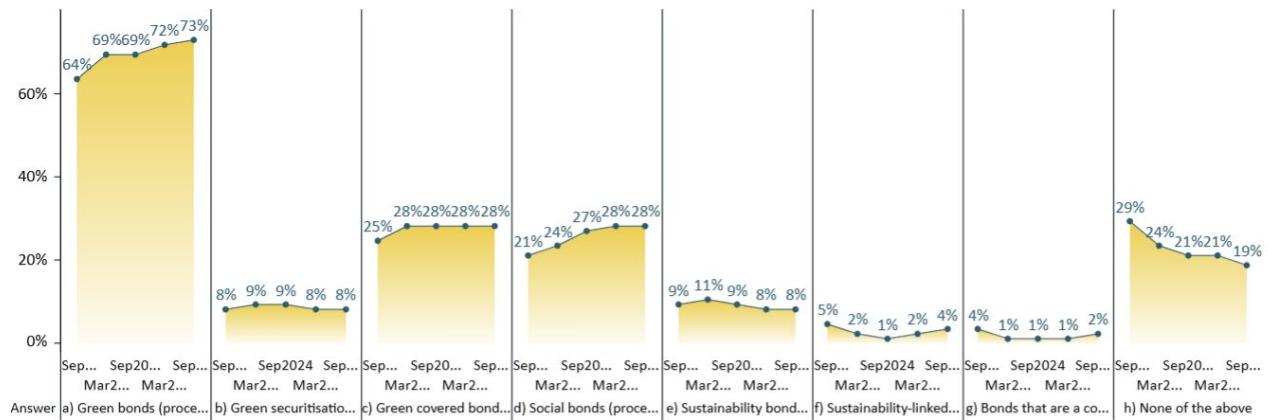
Question 30: Autumn 2025 results

Q30 Which of the following instruments have you already issued? Please note the differentiation between proceeds-based and performance-based products, as to avoid double counting. Please avoid double counting of products already included under other options presented in the question.

Question 30: comparison with earlier results

Annex: List of EU banks involved in RAQ

Financial Institution	Country
BAWAG Group AG	Austria
Erste Group Bank AG	Austria
Raiffeisen Bank International AG	Austria
Belfius Bank	Belgium
Crelan	Belgium
KBC Groupe	Belgium
DSK Bank AD	Bulgaria
First investment Bank AD	Bulgaria
Privredna Banka Zagreb d.d.	Croatia
Zagrebaka banka d.d.	Croatia
Bank of Cyprus Holdings Public Limited Company	Cyprus
Hellenic Bank Public Company Ltd	Cyprus
esk spoitelna, a.s.	Czechia
eskoslovensk obchodn banka, a.s.	Czechia
Komern banka, a.s.	Czechia
Danske Bank A/S	Denmark
Jyske Bank A/S	Denmark
Nykredit Realkredit A/S	Denmark
AS LHV Group	Estonia
Luminor Holding AS	Estonia
Nordea Bank Abp	Finland
OP Osuuskunta	Finland
BNP Paribas	France
Confdration Nationale du Crdit Mutuel	France
Groupe BPCE	France
Groupe Crdit Agricole	France
La Banque Postale	France
Socit gnrale S.A.	France
Bayerische Landesbank	Germany
COMMERZBANK Aktiengesellschaft	Germany
DEUTSCHE BANK AKTIENGESELLSCHAFT	Germany
DZ BANK AG Deutsche Zentral-Genossenschaftsbank, Frankfurt	Germany
Landesbank Baden-Wrttemberg	Germany
Landesbank Hessen-Thringen Girozentrale	Germany

Financial Institution	Country
Norddeutsche Landesbank - Girozentrale -	Germany
ALPHA SERVICES AND HOLDINGS S.A.	Greece
Eurobank Ergasias Services and Holdings S.A.	Greece
National Bank of Greece, S.A.	Greece
Piraeus Financial Holdings	Greece
MBH bankcsoport	Hungary
OTP-csoport	Hungary
Arion Banki hf	Iceland
Landsbankinn hf.	Iceland
AIB Group plc	Ireland
Bank of Ireland Group plc	Ireland
Citibank Europe plc	Ireland
Banca Monte dei Paschi di Siena S.p.A.	Italy
BANCO BPM SOCIETA' PER AZIONI	Italy
BPER Banca S.p.A.	Italy
ICCREA BANCA S.P.A. - ISTITUTO CENTRALE DEL CREDITO COOPER	Italy
Intesa Sanpaolo S.p.A.	Italy
UNICREDIT, SOCIETA' PER AZIONI	Italy
AS 'SEB banka'	Latvia
Swedbank Baltics AS	Latvia
AB Artea Bankas	Lithuania
Revolut Holdings Europe UAB	Lithuania
Banque et Caisse d'Epargne de l'Etat, Luxembourg	Luxembourg
Banque Internationale Luxembourg	Luxembourg
Bank of Valletta Plc	Malta
HSBC Bank Malta p.l.c.	Malta
DNB Bank ASA	Norway
SpareBank 1 Sr-Norge	Norway
Bank Polska Kasa Opieki S.A.	Poland
Powszechna Kasa Oszczednosci Bank Polski S.A.	Poland
Banco Comercial Portugus, SA	Portugal
Caixa Geral de Depsitos, S.A.	Portugal
Banca Comerciala Romana SA	Romania
BANCA TRANSILVANIA	Romania
Slovensk sporitea, a.s.	Slovak Republic
Veobecn verov banka, a.s.	Slovak Republic
Nova Ljubljanska Banka d.d., Ljubljana	Slovenia

Financial Institution	Country
OTP Luxembourg S.A.R.L.	Slovenia
Banco Bilbao Vizcaya Argentaria, S.A.	Spain
Banco de Sabadell, S.A.	Spain
Banco Santander, S.A.	Spain
BANKINTER, S.A.	Spain
CAIXABANK, S.A.	Spain
Unicaja Banco, S.A.	Spain
Skandinaviska Enskilda Banken - gruppen	Sweden
Svenska Handelsbanken - gruppen	Sweden
Swedbank - Grupp	Sweden
ABN AMRO Bank N.V.	The Netherlands
Coperatieve Rabobank U.A.	The Netherlands
de Volksbank N.V.	The Netherlands
ING Groep N.V.	The Netherlands

Appendix: Risk Assessment Questionnaire for banks

Business model, Strategy and Profitability

* **Q1 Do you expect an overall increase in your bank's ROE over the next 6 to 12 months?**

○ a) Yes
○ b) Probably yes
○ c) Probably no
○ d) No
○ e) No opinion

Q2 Which areas are you primarily targeting to increase the profitability of your bank in the next 6 to 12 months? (Rank according to priority with 1 - High Priority and 4 - Low Priority)

	1	2	3	4	Not Applicable
* a) Net interest income	○	○	○	○	○
* b) Net fee and commission income	○	○	○	○	○

* c) Other operating income	○	○	○	○	○
* d) Operating expenses / costs reduction	○	○	○	○	○
* e) Impairments	○	○	○	○	○
* f) Other	○	○	○	○	○

* Q3 What is your estimated Cost of Equity*?

○ a) < 6%   ○ d) ≥ 10% and < 12%

○ b) ≥ 6% and < 8%   ○ e) ≥ 12%

○ c) ≥ 8% and < 10%

* Q4 Which measures are you primarily taking to reduce operating expenses / costs?

Maximum 3 selection(s)

☐ a) Overhead and staff costs reduction

☐ b) Outsourcing

☐ c) Off-shoring or near-shoring

☐ d) Reducing business activities (business lines and locations, incl. branches)

☐ e) Increasing automatisation and digitalisation

☐ f) Other

* Q5 Are you considering Mergers & Acquisitions (M&A) transactions with/of?

Maximum 2 selection(s)

☐ a) Domestic business units

☐ b) Domestic portfolios

☐ c) Domestic credit institutions

☐ d) Credit institutions, business units and/or portfolios in other EU/EEA countries

☐ e) Credit institutions, business units and/or portfolios from outside the EU/EEA

☐ f) FinTech* firms (domestic or foreign)

☐ g) Non-bank financial service providers

☐ h) We are not considering M&A transactions

* Q6 Have you made use of significant risk transfers (SRT) in the past, and what are your SRT related plans for the future 6 to 12 months?

○ a) We have made use of SRTs in the past and aim to make use of SRTs at similar level going forward

○ b) We have made use of SRTs in the past, and aim to expand our usage of SRTs compared to our engagement in SRTs in the past

○ c) We have made use of SRTs in the past, but aim to reduce our usage of SRTs

○ d) We have made use of SRTs in the past, but are currently not sure about their further usage going forward

○ e) We have not made use of SRTs in the past, but aim to do so going forward

○ f) We have not made use of SRTs in the past, and would neither aim to do so going forward

○ g) We have not made use of SRTs in the past, and are currently not sure about their further usage going forward

Q7 Please rate the possible impact of the following potential geoeconomic factors on your institution, based on your institution's exposure

(1 – No impact or relevance and 5 - High impact)

	1	2	3	4	5
* a) Financial system fragmentation	○	○	○	○	○
* b) Economic sanctions (e.g. asset freezes, trade embargoes)	○	○	○	○	○
* c) Export controls (e.g. technical restrictions, dual-use goods)	○	○	○	○	○
* d) Investment restrictions (e.g. FDI screening*, outbound investment bans)	○	○	○	○	○
* e) Tariffs and other trade barriers	○	○	○	○	○
* f) Exchange rate moves or competitive devaluation	○	○	○	○	○
* g) Sovereign debt restrictions or defaults	○	○	○	○	○
* h) Restrictions of access to international financial infrastructure (e.g. Swift) or key service providers, resources or commodities	○	○	○	○	○
* i) Cyber-induced financial disruption	○	○	○	○	○

Q8 Please rate the level of expected implications that potential geoeconomic factors could have on your institution in the following areas?

(1 - No impact or relevance and 5 - High impact)

	1	2	3	4	5
* a) Increased compliance and due diligence costs	○	○	○	○	○
* b) Deterioration in asset quality or increased credit risk / provisioning	○	○	○	○	○
* c) Volatility in exchange rates or on financial and commodity markets more broadly	○	○	○	○	○
* d) Reputational risk due to secondary exposure or indirect links	○	○	○	○	○
* e) Disruption to cross-border payments and transactions	○	○	○	○	○
* f) Macroeconomic uncertainty	○	○	○	○	○
* g) Regulatory/policy uncertainty	○	○	○	○	○
* h) Reduced access to key markets or clients	○	○	○	○	○
* i) Limitations on capital flows and investment opportunities	○	○	○	○	○
* j) Liquidity constraints, including due to global capital shifts	○	○	○	○	○
* k) Supply chain financing disruptions	○	○	○	○	○
* l) Client attrition or exit risk	○	○	○	○	○

* m) Operational challenges in correspondent banking relationships	◉	◉	◉	◉	◉
* n) Loss of competitiveness in specific sectors	◉	◉	◉	◉	◉

Funding and Liquidity

*Q9 Which funding instruments do you intend to focus on in the next 12 months?

Maximum 3 selection(s)

- ☐ a) Preferred senior unsecured
- ☐ b) Senior non-preferred / Senior HoldCo*
- ☐ c) Subordinated debt including AT1/T2
- ☐ d) Secured (covered bonds)
- ☐ e) Securitisations
- ☐ f) Wholesale deposits
- ☐ g) Retail deposits
- ☐ h) Central bank funding
- ☐ i) Short-term interbank
- ☐ j) CET1 instruments
- ☐ k) Not applicable

Q10 Which of the following actions are you considering in relation to deposits (sight and term) and current accounts in the next 12 months?

	a) Increase	b) Decrease	c) Stable	d) Not applicable
* a) Rates for household deposits or current accounts*	◉	◉	◉	◉
* b) Rates for NFC* deposits or current accounts	◉	◉	◉	◉
* c) Fees for household deposits or current accounts* and related services	◉	◉	◉	◉
* d) Fees for NFC* deposits or current accounts and related services*	◉	◉	◉	◉

Asset composition and quality

Q11 Which portfolios do you plan to increase/decrease in volume during the next 12 months (on a net basis)?

	a) Increase	b) Decrease	c) Stable	d) No Opinion
* a) CRE*	◉	◉	◉	◉
* b) SME*	◉	◉	◉	◉

* c) Residential Mortgage	○	○	○	○
* d) Consumer Credit	○	○	○	○
* e) Large Corporates*	○	○	○	○
* f) Trading	○	○	○	○
* g) Structured Finance	○	○	○	○
* h) Sovereign and institutions	○	○	○	○
* i) Project Finance	○	○	○	○
* j) Asset Finance*	○	○	○	○
* k) Other	○	○	○	○

Q12 How would you assess loan demand during the next 12 months across the following corporate and household sectors?

	a) Increase	b) Stable	c) Decrease	d) N/A
* a) Manufacturing & Industrial	○	○	○	○
* b) Construction & Real Estate	○	○	○	○
* c) Energy & Utilities	○	○	○	○
* d) Technology & Telecommunications	○	○	○	○
* e) Transport & Logistics	○	○	○	○
* f) Retail & Wholesale Trade	○	○	○	○
* g) Financial and insurance	○	○	○	○
* h) Security and Defense	○	○	○	○
* i) Other Corporate Sectors	○	○	○	○
* j) Mortgages	○	○	○	○
* k) Consumer credit	○	○	○	○

Q13a How have the following factors currently affected (over the last 6 months) demand for corporate loans?

	a) Positively	b) Negatively	c) No or immaterial impact
* a) Interest rate levels	○	○	○
* b) Sector specific investments	○	○	○

* c) Regulatory changes	○	○	○
* d) ESG related considerations	○	○	○
* e) Supply chain shifts	○	○	○
* f) Government guarantees	○	○	○
* g) Consumer confidence	○	○	○
* h) Real estate dynamics	○	○	○
* i) Input cost pressures	○	○	○
* j) Tightening credit standards	○	○	○

Q13b How have the following factors currently affected (over the last 6 months) demand for household loans?

	a) Positively	b) Negatively	c) No or immaterial impact
* a) Interest rate levels	○	○	○
* b) Consumer confidence	○	○	○
* c) Real estate dynamics	○	○	○
* d) Inflation pressures	○	○	○
* e) Fiscal incentives	○	○	○
* f) Tightening credit standards	○	○	○
* g) ESG-linked borrowing	○	○	○

Q14 How do you expect exposures (both asset and liabilitiy side) towards non-bank financial intermediaries (NBFIs) to develop in the next 6-12 months?

	a) Increase	b) Decrease	c) Stable	d) No Opinion
* a) Lending to NBFIs (excluding repo based funding)	○	○	○	○
* b) Reverse repos (banks' providing collateral based liquidity to NBFIs)	○	○	○	○
* c) Securities (NBFIs investing in banks' debt issuance)	○	○	○	○
* d) Repos (NBFIs providing repo based funding to banks)	○	○	○	○
* e) Deposits from NBFIs	○	○	○	○
* f) Derivatives	○	○	○	○

*Q15 In light of the EU strategic priority for Security and Defence ("Readiness 2030"), how does your institution plan to support EU defence and security objectives?

Maximum 3 selection(s)

- ☐ a) Direct financing of EU defence and security projects, including companies aligned with the European Defence Fund (EDF) or Permanent Structured Cooperation (PESCO)
- ☐ b) Indirect financing through support of infrastructure related to defence readiness, supply chains, or via Research & Development linked to defence
- ☐ c) Indirect financing through dual-use technologies (e.g., AI, cybersecurity, space, drones)
- ☐ d) Participation in EU-level initiatives (e.g., InvestEU, European Investment Bank programs) that fund defence-related innovation or strategic autonomy
- ☐ e) Development of internal expertise or risk frameworks to assess defence-related transactions in compliance with EU regulations
- ☐ f) No current involvement, but monitoring EU guidance and future regulatory frameworks
- ☐ g) No involvement envisaged due to concerns around negative impact (e.g. reputational) vis-à-vis stakeholders
- ☐ h) No involvement envisaged or not applicable

Q16 Which portfolios do you expect to improve/deteriorate in asset quality in the next 12 months?

	a) Improve	b) Deteriorate	c) Stable	d) No Opinion
* a) CRE*	○	○	○	○
* b) SME*	○	○	○	○
* c) Residential Mortgage	○	○	○	○
* d) Consumer Credit	○	○	○	○
* e) Large Corporates*	○	○	○	○
* f) Trading	○	○	○	○
* g) Structured Finance	○	○	○	○
* h) Sovereign and institutions	○	○	○	○
* i) Project Finance	○	○	○	○
* j) Asset Finance*	○	○	○	○
* k) Other	○	○	○	○

Q17 What is your Cost of Risk estimation for the current financial year?

- ○ a) < 0bp
- ○ b) ≥ 0 and < 25bp
- ○ c) ≥ 25 and < 50bp
- ○ d) ≥ 50 and < 75bp
- ○ e) ≥ 75 and < 100bp
- ○ f) ≥ 100 and < 200bp

○ g) ≥ 200bp

* Q18 Do you have any provisioning overlays in place?

Maximum 2 selection(s)

☐ a) Yes, at the level of IFRS 9 model parameters (i.e., PD*, incl. SICR* assessment, LGD* and/or EAD)

☐ b) Yes, at total ECL (expected credit loss) level

☐ c) No

* Q18.1 If you selected a) or b), which factors are the overlays associated to?

☐ a) Model deficiencies/model updates

☐ b) Inflation

☐ c) Physical risks

☐ d) Political and geopolitical uncertainties

☐ e) Other ESG related risks

☐ f) Political and geopolitical uncertainties

☐ g) Sectorial and geographic uncertainties

☐ h) Aging of non-performing loans

* Q19 Which is the proportion of the total Expected credit loss (ECL) amount that is recognised via provisioning overlays?

○ a) 0%

○ b) ≥ 0% and < 10%

○ c) ≥ 10% and < 20%

○ d) ≥ 20% and < 30%

○ e) ≥ 30% and < 40%

○ f) ≥ 40%

Conduct, Reputational and Operational risk

* Q20 Over the past three years, how much has your firm paid out in the form of compensation, redress, litigation and similar payments (as percentage of equity*)?

○ a) ≥ 0% and <0,25%

○ b) ≥ 0,25% and <0,5%

○ c) ≥ 0,5% and <1%

○ d) ≥ 1% and <2%

○ e) ≥ 2% and <3%

○ f) ≥ 3% and <4%

○ g) ≥ 4%

* Q21 Which are the main drivers of operational risk?

Maximum 3 selection(s)

☐ a) Cyber risk and data security

- [ ] b) IT failures
- [ ] c) Outsourcing
- [ ] d) Regulatory initiatives
- [ ] e) Conduct and legal risk
- [ ] f) Organisational change
- [ ] g) Money Laundering and Terrorism Financing
- [ ] h) Risk of non compliance with applicable restrictive measures regimes (financial sanctions)
- [ ] i) Fraud
- [ ] j) Climate and environmental risk
- [ ] k) Other

Q22 Which key Money Laundering and Terrorism Financing risks do you expect to face over the coming 6 to 12 months? *(1 - Low Significance and 4 - High Significance)*

	1	2	3	4	Not Applicable
* a) Politically Exposed Persons	○	○	○	○	○
* b) Customers dealing in crypto-assets, including crypto Asset Services Providers	○	○	○	○	○
* c) Customers whose ownership and control structure is opaque or unduly complex	○	○	○	○	○
* d) Use of innovative technologies for Customer Due Diligence purposes	○	○	○	○	○
* e) Customers' transactions received from, or sent to, jurisdictions where groups committing terrorist offences are known to be operating, or that are known to be sources of terrorist financing	○	○	○	○	○
* f) Customers' transactions received from, or sent to, jurisdictions that are subject to international sanctions	○	○	○	○	○
* g) Customers whose activities or leadership are publicly known to be associated with extremism or terrorism	○	○	○	○	○
* h) Used for the laundering of the proceeds of frauds	○	○	○	○	○
* i) Used for the laundering of the proceeds of tax crime	○	○	○	○	○
* j) Used for the laundering of the proceeds of corruption	○	○	○	○	○
* k) Other	○	○	○	○	○

* Q23a How many cyber-attacks that resulted or could have potentially resulted in a "major ICT-related incident"* have you faced in the first half of 2025 (considering the highest level of consolidation)?

- ○ a) 0

b) 1 - 10

   c) 11 - 20

   d) 21 - 50

   e) > 50

*Q23b What kind of "major ICT-related incidents" did you experience in the in the first half of 2025, split by the following root causes of the incidents?

   a) Malicious actions

   b) Process failure

   c) System failure/malfunction

   d) Human error

   e) External event

   f) Information not available

Q24a How many successful cyber-attacks resulting in "major ICT-related incidents" have you faced in the first half of 2025 (considering the highest level of consolidation)?

   a) 0

   b) 1 - 5

   c) 6 - 10

   d) 11 - 20

   e) > 20

*Q24b What kind of threats and techniques were applied by the threat actor for the successful cyber-attacks resulting in "major ICT-related incidents" ?

   a) Social engineering, including phishing

   b) (D)Dos

   c) Identify theft

   d) Data encryption for impact, including ransomware

   e) Resource hijacking

   f) Data exfiltration and manipulation, excluding identity theft

   g) Data destruction

   h) Defacement

   i) Supply-chain attack

   j) Information not available

Financial Technology

Q25 How many ICT third-party providers provide AI systems or AI models to your bank for each of the following use cases?

0= in-house (including group subsidiaries) development of AI systems or AI models

	a) 0	b) 1-2	c) 3-5	d) >5
* a) AML/CFT* - Identification and verification (including remote onboarding and digital ID)	◉	◉	◉	◉
* b) AML/CFT* - Transaction Monitoring and behavioral analysis	◉	◉	◉	◉
* c) AML/CFT* - customer risk profiling	◉	◉	◉	◉
* d) Fraud detection and financial crime - real-time fraud detection	◉	◉	◉	◉
* e) Fraud and financial crime - real-time monitoring of payments (e.g. payer/payee verification)	◉	◉	◉	◉
* f) Regulatory compliance and reporting - automated regulatory or supervisory reporting	◉	◉	◉	◉
* g) Regulatory compliance and reporting - document processing and classification for compliance	◉	◉	◉	◉
* h) Credit and client profiling - Creditworthiness assessment (CWA)/Credit scoring	◉	◉	◉	◉
* i) Credit and client profiling - Profiling for credit scoring	◉	◉	◉	◉
* j) Credit and client profiling - Other profiling / clustering (e.g. segmentation)	◉	◉	◉	◉
* k) Risk management: Regulatory credit risk modelling	◉	◉	◉	◉
* l) Risk management: Monitoring conduct risk	◉	◉	◉	◉
* m) Risk management: Climate risk modelling / carbon footprint estimation	◉	◉	◉	◉
* n) Risk management: Other risk modelling, including anomaly detection or sentiment analysis	◉	◉	◉	◉
* o) Customer-facing application: AI chatbots (e.g. for customer service, onboarding)	◉	◉	◉	◉
* p) Customer-facing applications: other (e.g. virtual assistants)	◉	◉	◉	◉
* q) Optimisation of internal processes: document processing	◉	◉	◉	◉
* r) Optimisation of internal processes: workflow optimization / resource planning	◉	◉	◉	◉
* s) Optimisation of internal processes: maintenance for IT systems or ATMs	◉	◉	◉	◉

*Q26 Please indicate the top 2 reasons why your bank uses third-party entities in relation to AI systems and models

Maximum 2 selection(s)

☐ a) Reduced cost / investments

☐ b) Enhanced security

☐ c) Adoption to pace of innovation

☐ d) Enhanced scalability

☐ e) Ease of integration with wider technical ecosystem

☐ f) Limited internal expertise and skills

☐ h) Limitations of legacy systems

☐ i) Other

* Q26.1 If you have selected the answer "Other" to the previous question, please specify in the comment box:

150 character(s) maximum

[   ]

* Q27 Please indicate the top 3 challenges your bank faces in mitigating third-party dependency risks in relation to AI systems and models

Maximum 3 selection(s)

☐ a) Technical difficulty to switch providers or move services in-house

☐ b) Service disruptions

☐ c) Transparency of models and logic behind decisions

☐ d) Data quality

☐ e) Data governance

☐ f) Data security

☐ g) Auditability

☐ h) Scalability

☐ i) Identification and mitigation of bias and fairness

☐ j) Accessing and maintaining internal expertise

☐ k) Maintaining pace of innovation vis-à-vis third-party entities

☐ l) Cost

☐ m) Other

* Q27.1 If you have selected the answer "Other" to the previous question, please specify in the comment box:

150 character(s) maximum

[   ]

Q28 Are you providing, or do you expect to provide any of the following crypto-asset products and services to retail or wholesale clients within the next years?

	a) No	b) Currently providing	c) Expect to provide within the next 1 year	d) Expect to provide in 1-2 years	e) Expect to provide after 2 years or more

* a) Issuance of e-money tokens	○	○	○	○	○
* b) Issuance of asset-referenced tokens	○	○	○	○	○
* c) Issuance of other crypto-assets (MiCA scope)	○	○	○	○	○
* d) Issuance of tokenised deposits	○	○	○	○	○
* e) Issuance of other types of non-MiCA scope tokenised assets	○	○	○	○	○
* f) Custody and administration of crypto assets on behalf of clients	○	○	○	○	○
* g) Operation of a trading platform for crypto assets	○	○	○	○	○
* h) Exchange of crypto assets for funds	○	○	○	○	○
* i) Exchange of crypto-assets for other crypto-assets	○	○	○	○	○
* j) Execution of orders for crypto assets on behalf of clients	○	○	○	○	○
* k) Placing of crypto assets	○	○	○	○	○
* l) Reception and transmission of orders for crypto-assets on behalf of clients	○	○	○	○	○
* m) Advice on crypto assets	○	○	○	○	○
* n) Portfolio management on crypto-assets	○	○	○	○	○
* o) Transfer services for crypto-assets on behalf of clients	○	○	○	○	○
* p) Non-MiCA services involving tokenisation of assets	○	○	○	○	○

Environmental, Social and Governance (ESG) Finance

Q29 Which of the following loans, if any, are you offering to your clients?

Please note the differentiation between proceeds-based and performance-based products, as to avoid

double counting. Please avoid double counting of products already included under other options presented in the question.

	a) To NFCs* excl. SMEs*	b) To SMEs*	c) To non-SME retail (households)	d) Not Applicable
* a) Green loans (proceeds-based)	☐	☐	☐	☐
* b) Social loans (proceeds-based)	☐	☐	☐	☐
* c) Sustainability loans* (proceeds-based)	☐	☐	☐	☐
* d) Sustainability-linked loans* (performance-based)	☐	☐	☐	☐
* e) Loans that are a combination of proceeds and performance-based	☐	☐	☐	☐

*Q30 Which of the following instruments have you already issued?

Please note the differentiation between proceeds-based and performance-based products, as to avoid double counting. Please avoid double counting of products already included under other options presented in the question.

☐ a) Green bonds (proceeds-based) except green securitisations and green covered bonds

☐ b) Green securitisations (asset-based and/or proceeds-based)

☐ c) Green covered bonds (asset-based and/or proceeds-based)

☐ d) Social bonds (proceeds-based)

☐ e) Sustainability bonds* (proceeds-based)

☐ f) Sustainability-linked bonds* (performance-based)

☐ g) Sustainability-linked loans financing bonds (proceeds-based)

☐ h) Bonds that are a combination of proceeds and performance-based

☐ i) None of the above

Glossary – EBA Risk Assessment Questionnaire

Term	Definition/Explanation
Agency services	These may include services such as custody, corporate agency, corporate trust
Agentic AI	Refers to a specific type of Generative AI systems that are designed to act with high level of autonomously to achieve specific goals, such as virtual assistants or chatbots
AI	Artificial intelligence
AI system	A machine-based system that is designed to operate with varying levels of autonomy and that may exhibit adaptiveness after deployment, and that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs such as predictions, content, recommendations, or decisions that can influence physical or virtual environments.
AML/CFT	Anti-money laundering / countering the financing of terrorism
Asset Finance	These may include for example finance towards shipping, aircrafts etc.
BigTech	A large technology company whose primary activity is the provision of digital services
CBDC	Central bank digital currency
CCP	Central Counterparty Clearing House
Cost of Risk	Change in allowances and provisions as a ratio of total loans and advances subject to impairment
CRE	Commercial Real Estate (including all types of real estate developments)
(D)DoS	Denial-of-service
DLT	DLT refers to protocols and supporting infrastructure that allow computers in different locations to propose and validate transactions and update records in a synchronised way across a network
Equity	Please use the definition of the applied accounting standard
FinTech	Technologically enabled financial innovation that could result in new business models, applications, processes, or products with an associated material effect on financial markets and institutions and the provision of financial services' (Financial Stability Board)
GPAI	An AI system which is based on a general-purpose AI model and which has the capability to serve a variety of purposes, both for direct use as well as for integration in other AI systems
GPAI models	An AI model, including where such an AI model is trained with a large amount of data using self-supervision at scale, that

	displays significant generality and is capable of competently performing a wide range of distinct tasks regardless of the way the model is placed on the market and that can be integrated into a variety of downstream systems or applications, except AI models that are used for research, development or prototyping activities before they are placed on the market
GPAI system	An AI system which is based on a general-purpose AI model and which has the capability to serve a variety of purposes, both for direct use as well as for integration in other AI systems.
Household deposits or current accounts	These may include for example payments or transfer of funds, direct debits, standing orders, annual or monthly fees, issuance fees for debit cards, etc.
Large Corporates	NFCs other than small medium-sized enterprises (SMEs) and Commercial Real Estate (CREs)
License-as-a-service	Bank's product/service but branded by a third party
Major ICT-related incidents	An ICT-related incident that has a high adverse impact on the network and information systems that support critical or important functions of the financial entity (Article 3(10) of Regulation (EU) 2022/2554 on digital operational resilience for the financial sector)
MiCAR	Markets in Crypto-Assets
NFC	Non-financial corporate
NFCs deposits or current accounts and related services	These may include for example payments or transfer of funds, direct debits, standing orders, annual or monthly fees, etc.
Other regulated entities	Authorised pursuant to financial services regulation
PET	
Senior HoldCo	Senior Holding Company Funding
SME	Small and medium-sized enterprise
SICR	Significant Increase in Credit Risk as defined in IFRS9
Sustainability bonds/loans	Any combination of environmental, social and/or governance dimensions
Sustainability-linked bonds/loans	Bonds/loans linked to sustainability performance objectives/specific KPIs reflecting any combination of environmental, social and/or governance dimensions
White label or license-as-a-service	Bank's product/service branded by a third party

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