



Executive summary

The EU-wide Stress Test 2025 conducted by the EBA will entail the effective anticipated application of CRR3 for the participating banks

Context

- EBA should initiate and coordinate stress test exercises to assess the resilience of financial institutions.
- In this context, the EBA has released its final document on the methodology, templates, and guidance for the 2025 EU-wide stress test for informal consultation, based on a common methodology and scenarios, as well as on a set of templates that capture starting point data and stress test results to allow a rigorous approach.



🤵 Scope (Bank Sample)

The stress test will be carried out on a sample of banks representing 75% of the consolidated assets of the banking system of the Eurozone, non-Eurozone Member States and Norway: 68 banks of which 54 from the Euro Area.



- The launch of the exercise in January 2025 and in March 2025 the advanced data collection submission.
- The 1^a submission of results will be in April 2025, and the 2a submission in June 2025. Finally, the publication of results will be in early August 2025.

Key aspects

- The 2025 stress test builds upon the methodology used in the 2023 exercise, with improvements reflecting new insights and regulatory changes. Key updates include integrating the CRR3 and the enhancement of the centralisation of the NII projections.
- Bottom-up approach and hypothesis of static balance
- The exercise includes two common scenarios: a baseline scenario and an adverse scenario over a time horizon of 3 years (2025-2027). Covered risks: credit risk, including securitizations, market risk, CCR and CVA, operational and conduct risk.
- Banks are also required to stress NII, P&L elements and capital.
- Results will be input for the SREP

Credit Risk

- Dec24 restatement under CRR3
- models allowed

Conduct and

Oper.

- Internal

· Constraints to

- ensure consistency
- Justifying projections below thresholds

Market Risk

Highlights

Revaluation of positions at fair value

Inclusion of interest-earning or paying positions.

Non Financial Income and Expenses

Own methodoloa ies to project noninterest income and expenses



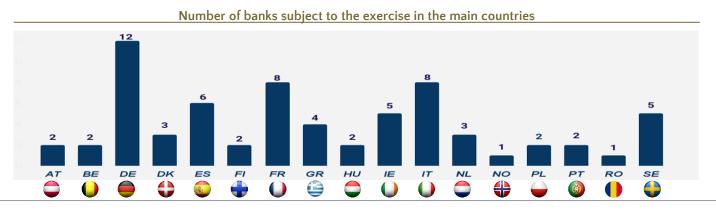


General overview Banks sample

Compared to EBA ST 2023 the sample coverage has been decreased by 8 fewer banks. The stress test will be carried out on a sample of banks representing 75% of the consolidated assets of the banking system of the Eurozone, non-Eurozone Member States and Norway

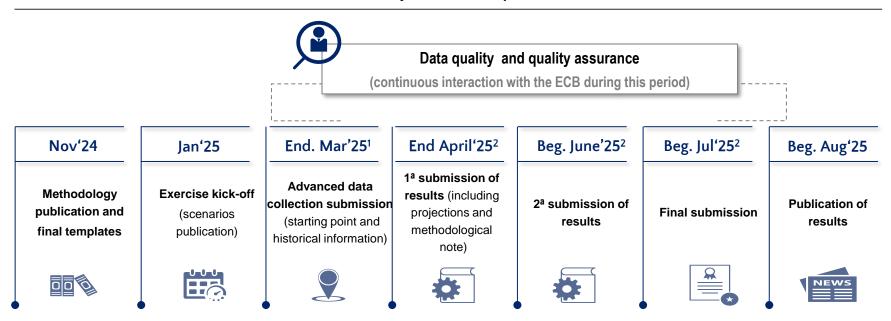
Banks participating in the 2025 stress test

- **68 banks**, of which 54 are from the Euro Area, representing more than 75% of total consolidated assets in the Eurozone, in countries outside the Eurozone and in Norway. **8 banks** have been eliminated **compared to the 2023** to the sample.
- Banks that enter the sample after broadly 70% coverage of the banking sector in the euro area, each non-euro area EU Member State and Norway is reached could apply **additional proportionality elements**, when interpreting the methodological note.



2 Main aspects of the exercise Calendar

The 2025 EBA stress test is scheduled to begin in January 2025 with the publication of the scenarios and final templates, and will finish at the end of July 2025 with the publication of the results



^{1.} Preliminary dates based on previous EBA Stress Test exercises. Although submission dates have not been published, the EBA has anticipated that has considered adjustments to submission dates and FAQ process, to accommodate the transition to CRR3



2 Main aspects of the exercise Key aspects

The 2025 stress test builds upon the methodology used in the 2023 exercise, with improvements reflecting new insights and regulatory changes. Key updates include integrating the CRR3 and the enhancement of the centralisation of the NII projections

KEY ASPECTS

Bottom-up approach and static balance

- Banks will perform the 2025 stress test exercise following a constrained bottom-up approach with some top-down elements (NFCI projections). Thus, banks are required to estimate the impact of the scenarios, although they are subject to restrictions.
- The stress test will be carried out under the hypothesis of static balance.

- Banks are required to stress:
 - · Credit risk, including securitizations.
 - · Market risk, CCR and CVA
 - Operational and conduct risk.
- Banks are also required to stress NII, P&L elements and capital.

Covered risks

Common base and adverse scenario

- The exercise includes two common scenarios: a baseline scenario and an adverse scenario.
 - The exercise is carried out on the basis of yearend 2024 figures, over a time horizon of 3 years (2025-2027).
 - The impact will be reported in terms of CET 1 capital¹. Also, the Tier 1 capital ratio, total capital ratio and LR will be reported.

- This exercise will not be a 'pass-fail exercise' (i.e. no minimum capital threshold has been set for banks to exceed).
- However, the CA will use the results of the stress test as **input for the SREP**².

Results will be input for the SREP

- (1) Both phase-in and fully loaded ratios.
- (2) In accordance with the EBA Guidelines on common procedure and methodologies for SREP and supervisory stress testing.



Type of information request General overview

In alignment with the last exercise, the 2025 stress test focuses mainly on assessing the impact of various risk factors on banks' solvency

Credit Risk

- Provision of starting point values (credit risk losses and REA) as of 31 Dec. 24 for actual and "restated" for the application of the CRR3 (also for projections over 2025-2027).
- New template requested with IRB exposures recalculated under STA approach as input to output floor calculation.
- Permission to use internal models for the projection of REAs (floor REAs 2024 restated) and credit losses (otherwise, apply ECB benchmark).
- Specific template for NPLs subject to backstops of provisions.
- A sectoral template for credit projections is requested.

Conduct and Operational Risk

- Banks will stress their conduct risk losses under one of the following approaches, subject to the floors of the exercise:
- Material conduct events: will be evaluated in a qualitative way..
- Non-material events: to be evaluated using own quantitative methods.
- Operational risk losses will be stressed using internal methods, subject to the floors of the year.
- Banks are required to restate total capital requirements for operational risk at the starting point according to the CRR3.

Market Risk

- Banks are required to assess the full **revaluation** of **positions** at **fair value**, considering stressed market risk factor shocks and proportionality criteria for different revaluation approaches.
- Finally, the implementation of FRTB is postponed.

Net Interest Income

- The draft provides guidelines for projecting NII under the centralised approach, as an enhancements for ST 2025 exercise.
- All interest-earning or paying positions, except held-for-trading instruments and related hedges, are scope of NII methodology,
- Held-for-trading positions and their related hedges are excluded and shall be treated separately.
- Application of exchange rate impact to the projection of the NII.

Non
Financial
Income and
Expenses

- Banks must use their **own methodologies** to project non-interest
 income and expenses for both the
 baseline and adverse scenarios,
 subject to caps and floors
- For NFCI, banks must apply the prescribed growth parameters
- Application of exchange rate impact to projections of commissions and administrative expenses (and their one offs)
- For Other remaining administrative expenses a breakdown for the top 5 countries divided by staff expenses and other administrative expenses is requested (CSV_ORAE)



Type of information request Main changes in the exercise (1/2)

Some important changes are introduced, notably the integration of the upcoming capital requirements regulation (CRR3)



• For credit risk losses, credit REA, securitizations, and operational REA banks shall report actual figures, according to the applicable regulatory framework as of 31 December 2024, and also, restated figures as of 31 December 2024 according to CRR3. Projections over 2025-2027, shall be done applying CRR3.

Actual credit risk losses and REA shall be reported using COREP asset classes as of end-2024. **Restated figures** shall be reported using **CRR3 COREP asset classes**.¹

Additionally, banks are required to report a new template (CSV_CR_REA_OF) for IRB exposures, including the equivalent
exposure and REA values recalculated under the STA approach (restated and projections figures), that will serve as an input for
the calculation of the output floor.

The **recalculated amounts** under the STA approach should be **reported both i)** using a **STA asset classes** breakdown and **ii)** using the **original IRB asset classes** breakdown.

- No transitional arrangements for the output floor (art. 465 of the CRR3) should be considered in the standardised REA at the starting point nor for the projections within the CSV_CR_REA_OF template
- CRR3 transitional arrangements for unconditional cancellable commitments (art. 495d of the CRR3) should not be considered in REA projections (in CSV_CR_REA and CSV_CR_REA_OF). The impact of these transitional arrangements will be considered within the CSV_CAP template
- CRR3 transitional arrangements for equity exposures (art. 495 and 495a of the CRR3) as well as the transitional adjustments for specialised lending exposures and for leasing exposures as a CRM technique (art. 495b, 495c of the CRR3) should be considered for the projections of REA within the CSV_CR_REA template. The impact of these transitional arrangements will be reported as an "of which" item within the CSV_CAP template.

Type of information request Main changes in the exercise (2/2)

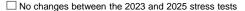
Some important changes are introduced, notably the integration of the upcoming CRR3



- Enhancements of Stress Test 2025 exercise is the inclusion of a centralisation approach of net interest income (NII) projections. For the portfolios that fall under the scope of the NII centralised approach, the projections for margin component and reference rate are based on the output of the NII centralised calculations. In case of derivatives portfolios, only reference rate projections are centralised. Banks shall project memo items, both reference rate and margin component. The calculation methodology is consistent with the previous exercise.
- Net interest income from held for trading and their related hedges are excluded from NII methodology and should be
 treated separately with another methodology, except from economic hedges that are part of the held for trading book but are held
 with the purpose of hedging non-held for trading instruments which are in scope of regular NII methodology.
- The treatment of held-for-trading positions excluded from NII methodology is based on the historical data (average between 2022-2024) including the effect of the related economic hedges. The resulting NII does not enter on the calculation of the aggregate NII cap, but it is added to the NII after the application of NII cap.
- Liabilities and assets for which funding matches are recognised, banks are required to provide the starting point volumes and maturity schedules in the relevant rows of the new template CSV_NII_CALC_FUNDING_MATCH.
- Further detail on applicable legal floor sight deposits which required banks to provide evidence about its application to CA and legally exempted new business margin component calculation is required.

Type of information request Changes per template (1/4)

	Template			
Template type	Field	Template name	Description	Changes detail
CSV ¹	Credit risk	CSV_CR_SUM	Credit risk - Summary	
CSV	Credit risk	CSV_CR_SCEN	Credit risk - Scenarios (projection for credit risk losses)	"Restated" data by allocating exposures as of 31 Dec. 2024 to the exposure classes in accordance with CRR3
CSV	Credit risk	CSV_CR_SECTOR	Credit risk - Exposures by sector of economic activity	REA restated and projections figures calculated under CRR3
CSV	Credit risk	CSV_CR_REA	Credit risk - REA	
csv	Credit risk	CSV_CR_REA_OF	Credit risk - REA Output Floor	For exposures under the IRB approach, equivalent exposure and REA values recalculated under the STA approach
CSV	Credit risk	CSV_CR_REA_IRB	REA - IRB approach floor	
CSV	Credit risk	CSV_CR_REA_ST A	REA - STA floor	Additional rows to consider restatement of starting point exposures and projections in accordance with CRR3
CSV	Credit risk	CSV_CR_SEC_SU M	Securitisations - Summary	Restated REA values assuming the same CQS allocation at the starting point
CSV	Credit risk	CSV_CR_SEC	Securitisations	 The amount of exposures that are not subject to mark-to-market valuation separately reported New column "Memo item: Exposure value (pre-floor)": pre regulatory-floor risk weight data at the starting point
CSV	Credit risk	CSV_CR_NPL	NPL calendar	Consideration of forbearance measures in the starting points as per COREP 35.03
CSV	Market risk, CCR losses and Value reserves	CSV_MR_SUM	Market risk - Summary	The maximum FRTB-ASA REA for SBA & RRAO (as reported in COREP 91) of the last four quarters
CSV	Market risk, CCR losses and Value reserves	CSV_MR_FULL_R EVAL	Market risk - Full revaluation template	 Information broken down by hedged items and hedging instruments Granular second order sensitivities ('gamma' and 'vega') of positions to IR, FX, equity, commodity, and inflation risk Information on balance sheet position, IFRS 9 measurement type, type of instrument and related hedges, type of counterparty and sensitivity



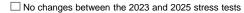
Differences between the 2023 and 2025 stress tests



New templates in the 2025 stress test

Type of information request Changes per template (2/4)

	Template				
Template type	Field	Template name	Description	Changes detail	
CSV	Market risk, CCR losses and CVA	CSV_MR_RESERV E	Market risk - Revaluation of reserves	The columns of the template show the accounting reserve, projected adverse scenario reserve from full revaluation, and the delta sensitivities of CVA to different risk factors	
CSV	Market risk, CCR losses and CVA	CSV_MR_PROJ	Market risk - Projection of client revenues items held with a trading intent and their related hedges		
CSV	Market risk, CCR losses and CVA	CSV_MR_CCR	Market risk - Counterparty defaults		
CSV	Market risk, CCR losses and Value reserves	CSV_MR_OPT_RE VAL	Market risk - Optional full revaluation template	Only for Banks classified as CA-adv with details of the revaluation of trading book's optional derivatives	
CSV	Market risk, CCR losses and CVA	CSV_MR_REA	REA - Market risk	Inclusion of MR REA for the computation of the output floor and memo item of which: risk not in VaR (RNIME)	
CSV	NII	CSV_NII_SUM	NII - Summary	New tables for reporting of regulated deposits; legal floor deposits; legally exempted products due to asset- liability matches; and acrued interest cash flows from trading book instruments	
CSV	NII	CSV_NII_CALC	NII - Calculation		
csv	NII	CSV_NII_CALC_FU NDING MATCH	NII - Reporting of asset liability matches	Fill the starting point sections, for the fixed and floating rate portfolios only for the exposures which are in scope of paragraphs 427 and 429 of the 2025 EU-wide stress test methodological note.	
CSV	Conduct risk and other operational risks	CSV_OR_GEN	Conduct and other operational risk losses	 Restated total capital requirements for operational risk at the starting point under CRR3 Business indicator component (mln EUR) should be provided by all banks. 	
CSV	Conduct risk and other operational risks	CSV_OR_CON	Material conduct risk losses		
CSV	Non-interest income, expenses and capital	CSV_REA_SUM	REA - Summary	Inclusion of standardised total risk exposure amount (STREA) for output floor	
CSV	Non-interest income, expenses and capital	CSV_NFCI_DIV	Evolution of net fee, commissions income and dividend income		
CSV	Non-interest income, expenses and capital	CSV_ONEOFF	Adjustments for non-recurring events (one-offs)		



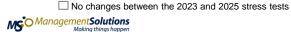
Differences between the 2023 and 2025 stress tests

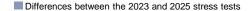


New templates in the 2025 stress test

Type of information request Changes per template (3/4)

				Template
Template type	Field	Template name	Description	Changes detail
CSV	Non-interest income, expenses and capital	CSV_MDA	Calculation of potential distribution restriction following breach of the risk-based MDA trigger level	
CSV	Non-interest income, expenses and capital	CSV_LR_MDA	Calculation of potential distribution restriction following breach of the Leverage ratio MDA trigger level	
CSV	Non-interest income, expenses and capital	CSV_CAP	Capital	Restated data as of 31 Dec. 2024 in accordance with CRR3
CSV	Non-interest income, expenses and capital	CSV_P&L	Evolution of P&L	
CSV	Non-interest income, expenses and capital	CSV_CAPMEAS	Major capital measures and material losses	
CSV	Non-interest income, expenses and capital	CSV_ORAE	Other remaining administrative expenses	Breakdown for the top 5 countries divided by staff expenses and other administrative expenses
TRA ¹	N/A	TRA_SUM	Summary adverse or baseline scenario (stress test results)	Restated data as of 31 Dec. 2024 in accordance with CRR3
TRA	Credit Risk	TRA_CR_IRB	Credit risk (loss projection) IRB	Restated data as of 31 Dec. 2024 in accordance with CRR3
TRA	Credit Risk	TRA_CR_STA	Credit risk (loss projection) STA	Restated data as of 31 Dec. 2024 in accordance with CRR3
TRA	Credit Risk	TRA_CR_SEC	Credit risk - Securitisations (REA projection)	
TRA	Non-interest income, expenses and capital	TRA_REA	REA (projection)	Restated data as of 31 Dec. 2024 in accordance with CRR3 New rows: standardized total REA for output floor (transitional) and standardized total REA for output floor







Type of information request Changes per template (4/4)

☐ No changes between the 2023 and 2025 stress tests

	Template			
Template type	Field	Template name	Description	Changes detail
TRA	Non-interest income, expenses and capital	TRA_CAP	Capital (projection)	Restated data as of 31 Dec. 2024 in accordance with CRR3 New rows: total risk exposure amount and output floor; and shortgages
TRA	Non-interest income, expenses and capital	TRA_P&L	P&L (projection)	New row: total assets
TRA	Non-interest income, expenses and capital	TRA_CAPMEAS	Major capital measures and material losses	
Total CSV	1		32	
Total TRA			8	



4 Why Management Solutions? Differential value proposition

MS has a differential experience, team and value proposition to support during stress test exercises as a result of our long track record in helping several institutions in previous exercises

Differential values of MS in the stress test area

- "One Firm": global partnership, present in more than 50 countries through its 48 offices
- Extensive participation in the various stress test exercises carried out in the industry since 2012 (in credit, market, operational and CCR risk, capital, NFCI and NII).
- Qualified supplier, approved in terms of capital and models by the main European supervisors. 6 framework agreements with the ECB (internal models, stress test, AQR, PMO, OSI/IMI and support for on site missions), +60 missions, being the best rated consultant in the capital field
- Extensive experience in the field of capital, ICAAP and stress tests in more than 60 financial institutions, both for G-SIBs and for local entities throughout the world
- Extensive **experience** working on the **management and modelling** of: i) credit risk (IRB parameters, stress models, IFRS9, management models,...), ii) market risk, iii) PPNR models, iv) and capital projection models
- A team of more than **300 experts in capital and stress tests** (modelling, regulations, impacts, information and systems, ...) based on a **multidisciplinary team** with quantitative, functional and technical profiles and strong regulatory knowledge
- Frankfurt based **R&D team** dedicated to benchmarking, regulatory analysis and innovation, supporting **benchmarking with other peers** in the EBA ST process
- 8 Independent firm, with a clear vocation for service and a proven track record of successful projects



Why Management Solutions? Differential value proposition

MS has participated in various internal and regulatory stress tests for a large number of financial institutions, collaborating with the main regulators and supervisors

Overview

- Collaboration with 9 financial supervisors in different geographies
- + 10 G-SIB Entities (in Europe and America)
- + 50 D-SIB Entities (Europe, America and Asia)
- + 200 Entities in +30 countries.
 - MS organises and sponsors events (MRM, BIS, Stress, Test, etc.) all over the world involving leading financial institutions and supervisors.

Main clients(1)

- ECB

BoS

Enel

- Santander · Lead US G-
- Lloyds BBVA

RBS

Banorte

Bancolombia

 Telefónica Iberdrola

- SIBs
- ING
- Banco de Chile GNF

- HSBC
 - - Bankia
- Davivienda
 - Mapfre

- Barclays Credit Suisse
- Caixabank
 Standard
- Generali

- · Deutsche Bank · Sabadell
- Popular
- Chartered Itaú
- Bradesco

- **Experience with supervisors**
- MS has been accredited as a "highly qualified external" provider" in the area of modelling.
- Service provider of the European Central Bank (ECB):
 - · With 5 framework agreements (Internal Modelling, Stress Test, AQR, PMO and On-site inspections).
 - Review of capital models
 - Implementation and maintenance of proprietary operational risk solution (SIRO).
- "PRA Skilled Person Panel (reference consultant).

- Collaboration with NCAs (integrated risk management, operational risk, etc.).
- Collaboration and permanent communication with supervisory bodies in Central and South America (BACEN, CNBV, SBIF, SEFC, SBS, SFC, etc.).
- Support in different supervisory processes in the EU and America with the approval of the supervisors: Stress Test EBA, CCAR in the USA, Internal Models in Europe, provisions in LATAM....



A Annex List of participants (1/2)

Country	Entity		
A T	Erste Group Bank AG		
AT	Raiffeisen Bank International AG		
BE	Belfius Banque SA		
DE	KBC Group NV		
	Bayerische Landesbank		
	Citigroup Global Markets Europe AG		
	COMMERZBANK Aktiengesellschaft		
	Deutsche Bank AG		
	DZ BANK AG Deutsche Zentral-Genossenschaftsbank		
	Goldman Sachs Bank Europe SE		
DE	J.P. Morgan SE		
	Landesbank Baden-Württemberg		
	Landesbank Hessen-Thüringen Girozentrale		
	Morgan Stanley Europe Holding SE (**)		
	Norddeutsche Landesbank – Girozentrale (**)		
	Volkswagen Bank GmbH (*)		
	Danske Bank		
DK	Jyske Bank		
	Nykredit Realkredit		

Country	Entity	
	Banco Bilbao Vizcaya Argentaria S.A.	
5 0	Banco de Sabadell S.A.	
ES	CaixaBank, S.A.	
	Unicaja Banco, S.A. (**)	
FI	Nordea Bank Abp	
FI	OP Osuuskunta (**)	
	BNP Paribas S.A.	
	BofA Securities Europe SA	
	Confédération Nationale du Crédit Mutuel	
FR	Groupe BPCE	
	Groupe Crédit Agricole	
	HSBC Continental Europe	
	La Banque Postale	
	Société Générale S.A.	
	ALPHA SERVICES & HOLDINGS S.A. (**)	
GR	Eurobank Ergasias Services and Holdings S.A. (**)	
GK	National Bank of Greece S.A. (**)	
	Piraeus Financial Holdings S.A. (**)	
1.11.1	OTP Bank Nyrt.	
HU	MBH bankcsoport (**)	

Banks marked with an asterisk (*) are provisionally included in the sample for potential adjustments. Banks marked with two asterisks (**) are subject to additional proportionality elements.



A Annex List of participants (2/2)

Country	Entity	
	AIB Group plc (**)	
	Bank of America Europe Designated Activity Company	
IE	Bank of Ireland Group plc (**)	
	Barclays Bank Ireland plc	
	Citibank Europe plc	
	Banca Monte dei Paschi di Siena S.p.A. (**)	
	Banco BPM S.p.A.	
	BPER Banca S.p.A.	
IT	Cassa Centrale Banca - Credito Cooperativo Italiano S.p.A. ()(**)	
11	ICCREA Banca S.p.A. – Istituto Centrale del Credito Cooperativo	
	Intesa Sanpaolo S.p.A.	
	Mediobanca - Banca di Credito Finanziario S.p.A. (*)	
	UniCredit S.p.a.	
	ABN AMRO Bank N.V.	
NL	Coöperatieve Rabobank U.A.	
	ING Groep N.V.	
	DNB Bank Group	
PL	Bank Polska Kasa Opieki SA	
	Powszechna Kasa Oszczedności Bank Polski SA	
PT	Banco Comercial Português, SA (**)	



Annex Abbreviations

Abbreviations	Meaning
APR	All price risk
AMA	Advanced Method of calculation (of operational risk)
ALM	Assets and Liabilities Management
BB	Investment portfolio
CA	Competent Authorities
CCR	Counterparty Credit Risk
CVA	Adjustment for credit risk assessment
EaR	Earnings at Risk
EBA	European Banking Authority
EC	European Commission
ECB	European Central Bank
ECL	Expected Credit Loss
EIR	Effective interest rate
ESRB	European Systemic Risk Board
EU	European Union
FRTB	Fundamental review of the trading book
FV	Fair value
FVO	Fair value option
FVOCI	Fair value through other comprehensive income
FVPL	Fair value through profit or loss

Abbreviations	Meaning
FVPL	Fair value through profit or loss
HFT	Held for Trading
IFRS	International Financial Reporting Standards
IRB	Internal ratings-based model
IRC	Incremental risk capital requirement
LGD	Severity
NCB	National Central Banks
NII	Net Interest Income
NTI	Net Trading Income
OCI	Other Comprehensive Income
PD	Probability of Default
P&L	Profit and Loss
REA	Risk Exposure Amount
SREP	Supervisory Review and Evaluation Process
S1/S2/S3	Stage 1/ Stage 2 / Stage 3
SSM	Single Supervisory Mechanism
STA	Standard method
SVaR	Value at Risk Stressed
VaR	Value at Risk





Cristina Modino

Partner at Management Solutions Cristina.modino@msspain.com

Marta Hierro

Partner at Management Solutions marta.hierro@msspain.com

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