

## Guidance on the Additional Liability Report

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### Summary of Changes:

The table below summarises any changes to the Guidance compared to the Guidance on the 2024 ALR, following the publication on September 30 2023.

Version	Date	Chapter	Summary of main changes
1.0 (2025)	30-09-2024	Tab A02 – Data for MPE (rows 0130, 0140)	Tab A01 – Guidance amended to clarify that the applicable total capital ratio requirement should exclude the Combined Buffer Requirement.
		Tab A03 – Data for Daisy Chains	Tab A03 – removed
1.1 (2026)	09-01-2026	Tab A99 - Identification of the Report	Tab A99 replaced tab T99 and some data points were removed.
		Tabs A01 - Data for MPE, A02 - Data for MCI	The instructions amended to reflect the new ITS on resolution reporting.
		Tab A04 - Other data	Tab A04 - introduced to collect data points that are not included in the resolution or supervisory reports.

## 1. General

### Objective of the Report

The aim of the Additional Liability Report is to collect the data points not included in the EBA ITS on MREL and TLAC reporting and disclosure<sup>1</sup>, in EBA ITS on resolution reporting<sup>2</sup> nor in EBA ITS on supervisory reporting<sup>3</sup>, functional to the application of the SRB MREL policy.

The Additional Liability Report is composed of data points related to:

- the policy on MPE.
- the application of art. 45a(2) BRRD.
- the calculation of adjustments on the recapitalisation amount.

All amounts shall be reported in EUR units.

### Scope

The ALR is requested only for groups under MPE strategy, for resolution groups where the deconsolidation of mortgage credit institutions as per art. 45a(2) applies, as well as for entities for which the data points defined in the template A04 at the level of consolidation corresponding to MREL are not reported in prudential (FINREP F 01.01) or resolution reports (Z 01.00).

- Tab "A01 - Data for MPE" shall be filled only for groups under MPE strategy.
- Tab "A02 - Additional Metrics" shall be filled only for resolution groups where the deconsolidation of mortgage credit institutions as per art. 45a(2) applies.
- Tab "A04 - Other data" shall be filled in only for entities for which the requested datapoints are not reported in resolution<sup>2</sup> nor supervisory<sup>3</sup> reporting at the scope of setting MREL, in particular when the resolution differs from the prudential scope of reporting.

### Frequency

Entities should fill in the template annually.

### Reporting Period

The reporting period is 31 December 2025.

### Filing naming structure

The file naming structure for remittance to the SRB/NRA is as follows:

***IDI\_Country\_Filingtype\_ReferenceDate.xlsx***

Where:

IDI	Identifier of the Institution. This is a text string of variable length. The unique identifier consists of one of the following: <ul style="list-style-type: none"> <li>- The Legal Entity Identifier (LEI) code, or</li> <li>- The RIAD MFI code, when the above is not available, or</li> </ul>
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<sup>1</sup> [Commission Implementing Regulation \(EU\) 2021/763](#)

<sup>2</sup> [EBA/ITS/2025/04](#)

<sup>3</sup> [Commission Implementing Regulation \(EU\) 2021/451](#)

	- An alternate code when neither of the above are available
Country	The ISO 3166-1-alpha-2 code of the country of incorporation of the entity.
Filing type	"AddLiabReport"
Reference Date	YYYY-MM-DD

## 2. Tab A99 - Identification of the Report

This tab includes information related to the report.

Row	Legal references and instructions
0010	<b>Name of Legal Entity</b> Name of the entity. Official name as it appears in corporate acts, including the indication of the legal form.
0020	<b>LEI of Legal Entity</b> The 20-digit, alphanumeric LEI code.
0030	<b>Country of incorporation</b> The ISO 3166-1-alpha-2 code of the country of incorporation of the entity.
0040	<b>Name of the Ultimate Parent Entity</b> The name of the ultimate parent entity to which the entity identified in 0010 belongs.
0050	<b>LEI of the Ultimate Parent Entity</b> LEI code identifying the ultimate parent entity to which the entity identified in 0010 belongs.
0070	<b>Level of Consolidation</b> Report one the following levels of consolidation: <ul style="list-style-type: none"> <li>- Individual;</li> <li>- Consolidated.</li> </ul>
0080	<b>Accounting Standard</b> Accounting standards applied by the entity. Report the following abbreviations: <ul style="list-style-type: none"> <li>- IFRS;</li> <li>- nGAAP.</li> </ul>
0100	<b>Reference Date</b> Reference date of the reported data, in the format YYYY-MM-DD.

## 3. Tab A01 - Data for MPE

This tab includes the data points needed to compute the adjustments to the MREL target for MPE banking groups.

This tab should be filled only by entities under MPE strategy.

Please report the data by Resolution Group (including both those located within the EU and in third countries).

Row	Legal references and instructions
0110	<p><b>Name of the point of entry</b></p> <p>Free-form text identification of the incorporation name of the resolution entity for the resolution group reported in the column. Please state the official name as it is listed in corporate acts, including the indication of the incorporation form.</p>
0120	<p><b>LEI/MFI/Local Identifier of Legal Entity</b></p> <p>The unique LEI code for the entity, in line with requirements by EMIR or Dodd-Frank, for which the report is submitted. In the absence of a LEI, the ECB Monetary Financial Institutions unique Identifier (MFI ID) of the entity for use in RIAD should be used. In absence of both such identifiers, a local identifier shall be used (please contact your NRA for this).</p>
0130	<p><b>Total Capital ratio requirement (% TREA)</b></p> <p>For resolution groups domiciled in EU, report the Total SREP capital requirement (i.e.: sum of the applicable Pillar 1, Pillar 2 excluding the Combined buffer requirement).</p> <p>For resolution groups domiciled in third countries, report the applicable total capital ratio requirement -excluding Combined Buffer Requirement as applicable- in accordance with local rules.</p> <p>The final capital requirements shall be reported without accounting for any phase-in that it may have been applied.</p>
0140	<p><b>Combined buffer requirement (% TREA)</b></p> <p>For resolution groups domiciled in EU, Article 128 (8) of the CRD The combined buffer is calculated in line with article 128 (8) of the CRD.</p> <p>For resolution groups domiciled in third countries, leave it blank where it does not exist.</p>
0150	<p><b>Requirement for own funds and eligible liabilities that has been determined in relation to RG (% TREA)</b></p> <p>Please report the latest resolution requirement communicated<sup>4</sup> by the competent Resolution Authority, in percentage of TREA (according to local rules).</p> <p>For resolution groups domiciled in EU, report the MREL.</p> <p>For resolution groups domiciled in third countries with a resolution framework, report the MREL or TLAC or the equivalent resolution requirement. Where multiple requirements are applicable in the third country jurisdiction, please report the highest.</p> <p>For resolution groups domiciled in third countries without a resolution framework report the applicable total capital ratio requirement, calculated in accordance with local rules.</p> <p>Please report the final requirements, without accounting for any phase-in that it may have been applied.</p>
0155	<p><b>Requirement for own funds and eligible liabilities that has been determined in relation to RG (% LRE)</b></p> <p>Please report the latest resolution requirement communicated by the competent Resolution Authority, in percentage of LRE (according to local rules).</p> <p>For resolution groups domiciled in EU, report the MREL.</p> <p>For resolution groups domiciled in third countries with a resolution framework, report the MREL or TLAC or the equivalent resolution requirement. Where multiple requirements are applicable in the third country jurisdiction, please report the highest.</p>

<sup>4</sup> Until the reporting reference date of the report

	For resolution groups domiciled in third countries without a resolution framework report the applicable total capital ratio requirement, calculated in accordance with local rules. Please report the final requirements, without accounting for any phase-in that it may have been applied.
0160	<b>Total risk exposure amount of the RG</b> The total risk exposure amount of the resolution group calculated in accordance with local rules.
0165	<b>Leverage ratio exposure of the RG</b> Leverage ratio exposure amount of the resolution group calculated in accordance with local rules.
0169	<b>Type of requirement reported in rows 0150 – 0155</b> Please specify if the requirement reported in rows 0150 – 0155 is either: - “MREL”, or - “TLAC”, or - “Third country equivalent resolution requirement”, or - “Capital requirement”
0170	<b>Amount of own funds of RG</b> Report the amount of own funds of the resolution group in accordance with local rules. Sum of rows 0180, 0190, 0200.
0180	<b>CET1</b> The Common Equity Tier 1 calculated in accordance with local rules of the resolution group.
0190	<b>AT1</b> The Additional Tier 1 capital calculated in accordance with local rules of the resolution group.
0200	<b>T2</b> The Tier 2 capital calculated in accordance with local rules of the resolution group.
0210	<b>Amount of eligible liabilities of RG</b> Report the amount of eligible liabilities of the resolution group. Sum of rows 0220, 0230, 0240, 0250.
0220	<b>(Eligible) Subordinated liabilities (not recognised as own funds)</b> Subordinated liabilities, calculated in accordance with local rules of the resolution group, which are eligible for the purposes of the requirement in row 0150.  If row 0150 is reported as the capital requirements, this cell should be 0.
0230	<b>(Eligible) SNP liabilities</b> Senior non-preferred, calculated in accordance with local rules of the resolution group, which are eligible for the purposes of the requirement in row 0150. If row 0150 is reported as the capital requirements, this cell should be 0.
0240	<b>(Eligible) Senior liabilities</b> Senior unsecured liabilities, calculated in accordance with local rules of the resolution group, which are eligible for the purposes of the requirement in row 0150. If row 0150 is reported as the capital requirements, this cell should be 0.

0250	<b>(Eligible) Other</b> Any other instrument that is eligible for the purposes the requirement in row 0150. If row 0150 is reported as the capital requirements, this cell should be 0.
0260	<b>Amount of bail-in-able liabilities of RG</b> Report the total amount of bail-in-able liabilities of the resolution group. Sum of rows 0270, 0280, 0290, 0300.
0270	<b>Subordinated liabilities (not recognised as own funds)</b> Amount of bail-in-able subordinated liabilities (not recognised as own funds) of the resolution group.
0280	<b>SNP liabilities</b> Amount of bail-in-able SNP liabilities of the resolution group.
0290	<b>Senior liabilities</b> Amount of bail-in-able senior liabilities of the resolution group.
0300	<b>Other bail-in able liabilities</b> Amount of other bail-in-able liabilities of the resolution group.
0310	<b>Amount of own funds instruments issued by RG and held by the reporting resolution group</b> Report the total amount of own funds instruments issued by RG and held by the reporting resolution group. Sum of rows 0320, 0330, 0340.
0320	<b>Participation</b> The total value for which the direct or indirect participations in the RG are recorded in the accounts of the reporting resolution group
0330	<b>AT1</b> The Additional Tier 1 capital issued by RG and held by the reporting resolution group.
0340	<b>T2</b> The Tier 2 capital issued by RG and held by the reporting resolution group.
0350	<b>Risk weighted amount of own funds instruments issued by RG and held by the reporting resolution group</b> The same risk-weights used to calculate the TREA of RG in the RESOL1 {Z03.01, 0100}, calculated in accordance with CRR rules, should be used to report the risk-weighted amounts under rows 0350 to 0380.
0360	<b>Participation</b> The risk weighted amount of the direct or indirect participations in the RG, calculated in accordance with CRR rules.
0370	<b>AT1</b> The risk weighted amount of the Additional Tier 1 capital issued by RG and held by the reporting resolution group, calculated in accordance with CRR rules.

0380	<b>T2</b> The risk weighted amount of the Tier 2 capital issued by RG and held by the reporting resolution group, calculated in accordance with CRR rules.
0390	<b>Amount of eligible liabilities items issued by RG and held by the reporting resolution group</b> Sum of rows 0400, 0410, 0420, 0430.
0400	<b>(Eligible) Subordinated liabilities (not recognised as own funds)</b> Subordinated liabilities, that are eligible to meet the requirement in row 0150, issued by RG and held by the reporting resolution group.
0410	<b>(Eligible) SNP liabilities</b> Senior non-preferred liabilities, eligible to meet the requirement in row 0150 and issued by RG and held by the reporting resolution group.
0420	<b>(Eligible) Senior liabilities</b> Senior liabilities, eligible to meet the requirement in row 0150 and issued by RG and held by the reporting resolution group.
0430	<b>(Eligible) Other</b> Any other eligible instrument issued by RG and held by the reporting resolution group.
0440	<b>Risk weighted amount of eligible liabilities items issued by RG and held by the reporting resolution group</b> The same risk-weights used to calculate the TREA of RG in the RESOL1 {Z03.01, 0100} should be used to report the risk-weighted amounts under rows 0450 to 0480.
0450	<b>Subordinated liabilities (not recognised as own funds)</b> The risk weighted amount of the subordinated liabilities (not recognised as own funds) issued by RG and held by the reporting resolution group, calculated in accordance with CRR rules.
0460	<b>(Eligible) SNP liabilities</b> The risk weighted amount of the SNP liabilities issued by RG and held by the reporting resolution group, calculated in accordance with CRR rules.
0470	<b>(Eligible) Senior liabilities</b> The risk weighted amount of the senior liabilities issued by RG and held by the reporting resolution group, calculated in accordance with CRR rules.
0480	<b>(Eligible) Other</b> The risk weighted amount of the other eligible instruments issued by RG and held by the reporting resolution group, calculated in accordance with CRR rules.
0490	<b>Amount of bail-in-able liabilities items issued by RG and held by the reporting resolution group</b> Report the total amount of bail-in-able liabilities items issued by RG and held by the reporting resolution group. Sum of rows 0500, 0510, 0520, 0530.

0500	<b>(Bail-in-able) Subordinated liabilities (not recognised as own funds)</b> Report the total amount of bail-in-able subordinated liabilities items issued by RG and held by the reporting resolution group.
0510	<b>(Bail-in-able) SNP liabilities</b> Report the total amount of bail-in-able SNP liabilities items issued by RG and held by the reporting resolution group.
0520	<b>(Bail-in-able) Senior liabilities</b> Report the total amount of bail-in-able senior liabilities items issued by RG and held by the reporting resolution group.
0530	<b>Other bail-in able liabilities</b> Report the total amount of other bail-in-able liabilities items issued by RG and held by the reporting resolution group.
0540	<b>Risk weighted amount of bail-in-able liabilities items issued by RG and held by the reporting resolution group</b> The same risk-weights used to calculate the TREA of RG in the related RESOL1 {Z03.01, 0100} should be used to report the risk-weighted amounts under rows 0550 to 0580.
0550	<b>(Bail-in-able) Subordinated liabilities (not recognised as own funds)</b> The risk weight of the bail-in-able subordinated liabilities (not recognised as own funds) issued by RG and held by the reporting resolution group, calculated in accordance with CRR rules
0560	<b>(Bail-in-able) SNP liabilities</b> The risk weight of the bail-in-able SNP liabilities issued by RG and held by the reporting resolution group, calculated in accordance with CRR rules
0570	<b>(Bail-in-able) Senior liabilities</b> The risk weight of the bail-in-able senior liabilities issued by RG and held by the reporting resolution group, calculated in accordance with CRR rules
0580	<b>Other bail-in-able liabilities</b> The risk weight of the other bail-in-able liabilities issued by RG and held by the reporting resolution group, calculated in accordance with CRR rules
0590	<b>Percentage of own funds instruments and eligible liabilities items issued by RG and held by the reporting resolution group (%)</b> Computed as a weighted average of rows 0600-0660, using as weights rows 0180-0200 and 0220-0250
0600	<b>CET1 (%)</b> CET1 instruments issued by the RG and held by the reporting resolution group, in percentage of total CET1 instruments issued by the RG
0610	<b>AT1 (%)</b>



	Additional Tier 1 instruments issued by the RG and held by the reporting resolution group, in percentage of total AT1 instruments issued by the RG
0620	<b>T2 (%)</b> Tier 2 instruments issued by the RG and held by the reporting resolution group, in percentage of total AT1 instruments issued by the RG
0630	<b>(Eligible) Subordinated liabilities (not recognised as own funds) (%)</b> Eligible subordinated liabilities (not recognised as own funds) instruments issued by the RG and held by the reporting resolution group, in percentage of total eligible subordinated liabilities (not recognised as own funds) instruments issued by the RG
0640	<b>(Eligible) SNP liabilities (%)</b> Eligible SNP liabilities instruments issued by the RG and held by the reporting resolution group, in percentage of total eligible SNP liabilities instruments issued by the RG
0650	<b>(Eligible) Senior liabilities (%)</b> Senior liabilities instruments issued by the RG and held by the reporting resolution group, in percentage of total SNP liabilities instruments issued by the RG
0660	<b>(Eligible) Other (%)</b> Other eligible liabilities instruments issued by the RG and held by the reporting resolution group, in percentage of total SNP liabilities instruments issued by the RG
0670	<b>Percentage of own funds instruments and bail-in-able liabilities items issued by RG and held by the reporting resolution group (%)</b> Computed as a weighted average of rows 0600-0620 and 0680-0710, using as weights rows 0180-0200 and 0270-0300
0680	<b>(Bail-in-able) Subordinated liabilities (not recognised as own funds) (%)</b> Bail-in-able subordinated liabilities (not recognised as own funds) instruments issued by the RG and held by the reporting resolution group, in percentage of total bail-in-able subordinated liabilities (not recognised as own funds) instruments issued by the RG
0690	<b>(Bail-in-able) SNP liabilities (%)</b> Bail-in-able SNP liabilities instruments issued by the RG and held by the reporting resolution group, in percentage of total eligible SNP liabilities instruments issued by the RG
0700	<b>(Bail-in-able) Senior liabilities (%)</b> Bail-in-able senior liabilities instruments issued by the RG and held by the reporting resolution group, in percentage of total bail-in-able senior liabilities instruments issued by the RG
0710	<b>(Bail-in-able) Other (%)</b> Other bail-in-able liabilities instruments issued by the RG and held by the reporting resolution group, in percentage of other bail-in-able liabilities instruments issued by the RG

#### 4. Tab A02 - Data for MCI

This tab includes the data points needed to compute MREL target of resolution groups where the deconsolidation of mortgage credit institutions (art. 45a(2) BRRD) applies.

Column	Legal references and instructions
0010	<b>Minimum requirement for own funds and eligible liabilities (MREL)</b> Article 45 and 45e BRRD.

Row	Legal references and instructions
0100	<b>Total risk exposure amount (TREA)</b> Point (a) of Article 45 (2) BRRD after the adjustments due art. 45a(2).
0110	<b>Total exposure measure (TEM)</b> Point (b) of Article 45 (2) BRRD after the adjustments due art. 45a(2).
0120	<b>Total assets</b> Total assets -as defined for FINREP {F 01.01;380,010}- of the resolution group after the adjustments due art. 45a(2).
0125	<b>Total liabilities and own funds including derivative liabilities</b> Amount requested in RESOL1 {Z 02.00, 0600, 0090} of the resolution group after the adjustments due art. 45a(2).
0126	<b>Institution-specific countercyclical capital buffer</b> Amount requested in RESOL1 {Z 03.01, 0430} of the resolution group after the adjustments due art. 45a(2).
0127	<b>Combined buffer requirement</b> Amount requested in RESOL1 {Z 03.01, 0400} of the resolution group after the adjustments due art. 45a(2).
0130	<b>TREA of holdings of capital instruments of Mortgage Credit Institutions (Art. 45a(2))</b> TREA of holdings of capital instruments of Mortgage Credit Institutions (Art. 45a(2)).
0140	<b>TEM of holdings of capital instruments of Mortgage Credit Institutions (Art. 45a(2))</b> TEM of holdings of capital instruments of Mortgage Credit Institutions (Art. 45a(2)).
0150	<b>Holdings (assets) of capital instruments of Mortgage Credit Institutions (Art. 45a(2))</b> Amounts of holdings (assets) of capital instruments of Mortgage Credit Institutions (Art. 45a(2)).

## 5. Tab A04 - Other data

This tab includes data points needed to compute the MREL target, where the resolution scope differs from the prudential scope of reporting. The data points are requested at the level of consolidation of the MREL target.

Column	Legal references and instructions
0010	<b>Minimum requirement for own funds and eligible liabilities (MREL)</b> Article 45 and 45e BRRD.

Row	Legal references and instructions
0100	<b>Total assets</b> Total assets as defined for FINREP {F 01.01;380,010}.