

Instructions for completing the total assets and total risk exposure templates for collecting supervisory fee factors

July 2022

Starting with the 2020 fee period, the ECB will reuse FINREP and COREP data to determine the fee factors for the majority of supervised banks.

Two categories of banks must still provide their fee factors via a separate collection process:

1. Groups that exclude the assets and/or risk exposure amounts of subsidiaries in non-participating Member States:
 - In order to ensure a smooth collection process, groups with subsidiaries established in non-participating Member States or third countries intending to exclude the assets and/or risk exposure amounts of those subsidiaries from their fee factors must notify the ECB by 30 September of each fee period by submitting the notification via the online portal account. Groups may choose to deduct the contribution of non-SSM subsidiaries to the total risk exposure (TRE), to total assets (TA), or both. If no such notification is received, it is assumed that the group does not wish to deduct the contribution of non-SSM subsidiaries. In this case the highest level of consolidation TRE (COREP, template C 02.00, row 010, column 010) and the highest level of consolidation TA (FINREP, template F 01.01, row 380, column 010) acquired by the ECB via regulatory reporting will be reused as input for the calculation of the supervisory fee.
2. Branches established in participating Member States by credit institutions from non-participating Member States which are not subject to the ECB's FINREP Regulation or to mandatory FINREP reporting pursuant to national reporting requirements.

While exempt from the obligation to submit fee factors, branches that are subject to the ECB's FINREP Regulation or to mandatory FINREP reporting pursuant to national reporting requirements have to submit a management letter to their National Competent Authority (NCA). Please see Section 5 for more information.

For supervised entities classified as "less significant" on the basis of an ECB decision made in accordance with Article 6(4) of [Council Regulation \(EU\)](#)

No 1024/2013¹ in conjunction with Articles 70(1) and 71 of [Regulation \(EU\) No 468/2014 of the European Central Bank \(SSM Framework Regulation\) \(ECB/2014/17\)](#)² and Article 10(3)(d) of [Regulation \(EU\) No 1163/2014 of the European Central Bank \(ECB/2014/41\)](#)³, a TA value of €30 billion, or the TA value submitted in FINREP if the latter is lower, will be taken into account by the ECB when determining the fee factor.

2 Instructions for both templates⁴

- “Name”, “MFI code” and “LEI code” refer to the fee debtor⁵.
- “MFI code”⁶ should always be filled in. “LEI code” is compulsory except where the fee debtor is a branch, in which case the “LEI code” field must be left blank.
- The amounts for TA and TRE should be expressed in euro, in full amounts.
- The “comments” column included in both templates should be used by the supervised entities to report any additional information that may be used to interpret the data or any other information to be shared with the NCA.
- The fee factors are calculated taking into account the prudential scope of consolidation. Therefore, among other assets, the assets of investment firms have to be included in the fee factor calculation if the investment firms are part of a banking group at the highest level of consolidation.

Sign convention

The data values in both templates should be provided in absolute amounts.

¹ Council Regulation (EU) No 1024/2013 of 15 October 2013 conferring specific tasks on the European Central Bank concerning policies relating to the prudential supervision of credit institutions (OJ L 287, 29.10.2013, p. 63–89).

² Regulation (EU) No 468/2014 of the European Central Bank of 16 April 2014 establishing the framework for cooperation within the Single Supervisory Mechanism between the European Central Bank and national competent authorities and with national designated authorities (SSM Framework Regulation) (ECB/2014/17) (OJ L 141, 14.5.2014, p. 1–50).

³ Regulation (EU) No 1163/2014 of the European Central Bank of 22 October 2014 on supervisory fees (ECB/2014/41) (OJ L 311, 31.10.2014, p. 23–31).

⁴ The text of the templates is available in national languages in Annexes I and II of Decision (EU) 2019/2158 of the European Central Bank of 5 December 2019 on the methodology and procedures for the determination and collection of data regarding fee factors used to calculate annual supervisory fees (ECB/2019/38) (OJ L 327, 17.12.2019, p. 99–107).

⁵ The fee debtor serves as a contact point for the ECB for all communication related to the annual supervisory fee.

⁶ The MFI code is equivalent to the RIAD code. For more information, see [MFI data access](#).

Data quality controls

The data quality process – the controls implemented to compare the TRE and TA figures with the regulatory reporting at the ECB's disposal – is explained in the following sections.

3 Instructions for the “total assets” (TA) template⁷

All red cells in the template must be completed. The yellow cells in the template must be completed only when applicable. All fields marked in grey must be left blank. When selecting the type of institution in column 010, cells might change colour in order to guide the fee debtor when filling in the template.

The following information is contained in the headers:

- Reference date: accounting year-end for all entities established before 1 January of the fee period. For example, for an entity with its accounting year-end in March, the reference date shall be March of the preceding fee period. For entities established after 1 January of the fee period, the reference date shall correspond to the next reporting date. For example, for an entity established in April of the fee period, the reference date shall be June of the fee period, irrespective of its accounting year-end date.
 - Submission date: this is a mandatory field and must be filled in with the day of submission of the TA template.⁸
 - Name of the institution or banking group: this is a mandatory field and must be filled in with the name of the fee debtor (the fee-paying credit institution/branch/entity nominated as fee debtor for the whole group).
 - “MFI code”⁹ of the fee debtor: this is a mandatory field for all fee debtors.
 - “LEI code” of the fee debtor: this is a mandatory field for all fee debtors with the exception of branches. Branches must leave this field blank.
 - The cell in row 010, column 010 must be completed with the institution type, as follows¹⁰:
1. Where the fee debtor submits a TA figure corresponding to the amount of TA stipulated in Article 51(2) or 51(4) of [Regulation \(EU\) No 468/2014 of the European Central Bank \(SSM Framework Regulation\) \(ECB/2014/17\)](#), it must complete row 010 for the “type of institution” column as follows:

⁷ Annex II of Decision (EU) 2019/2158 of the European Central Bank.

⁸ The submission date must be updated in the event of resubmissions.

⁹ The MFI code is equivalent to the RIAD code. See [MFI data access](#) for more information.

¹⁰ Please note that the numbering system has been changed.

Type of institution 3: supervised entities and supervised groups which are not subject to mandatory reporting for prudential purposes shall determine their total assets as defined in Article 2, point 12(d) of [Regulation \(EU\) No 1163/2014 of the European Central Bank \(ECB/2014/41\)](#).

Supervised groups that are not subject to mandatory reporting for prudential purposes that have notified the ECB of their intention to deduct the contributions of subsidiaries established in non-participating Member States or third countries to both TRE and TA, or to TA only, from their fee factors, should select institution type 2 in the first case, and type 5 in the second. Please see point 3 below for instructions on how to fill in the template for institution types 2 and 5.

- Row 010, column 030 should be filled in with the value of the TA.
 - (i) If the supervised entity is part of a supervised group, the total value of its assets shall be determined on the basis of the most recent audited consolidated annual accounts prepared in accordance with International Financial Reporting Standards (IFRS) as applicable within the Union in accordance with Regulation (EC) No 1606/2002 of the European Parliament and of the Council.¹¹ If those annual accounts are not available, the total value of assets must be determined on the basis of the consolidated annual accounts prepared in accordance with applicable national accounting laws (see Article 51(2) of Regulation (EU) No 468/2014 (ECB/2014/17)).
 - (ii) If the supervised entity is not part of a supervised group, the total value of its assets shall be determined on the basis of the most recent audited annual accounts prepared in accordance with International Financial Reporting Standards (IFRS) as applicable within the Union in accordance with Regulation (EC) No 1606/2002 of the European Parliament and of the Council. If those annual accounts are not available, the total value of assets must be determined on the basis of the annual accounts prepared in accordance with applicable national accounting laws (see Article 51(4) of Regulation (EU) No 468/2014 (ECB/2014/17)).

Reporting entities selecting “type of institution 3” in the TA template must have selected “type of institution 3” **or** “type of institution 1” in the TRE template.

¹¹ Regulation (EC) No 1606/2002 of the European Parliament and of the Council of 19 July 2002 on the application of international accounting standards (OJ L 243, 11.9.2002, p. 1).

Example

CALCULATION OF FEES		Reference date	31/12/2019	NAME	Institution B
TOTAL ASSETS		Submission date	10/11/2020	MFI Code	IT0000002
				LEI code	ABCDEFGHIJ1234567890
Item		Type of institution	Confirmation of auditor's verification or of management letter for fee-paying branches (Yes/No)	Total assets	Comments
		010	020	030	040
010	TOTAL ASSETS in accordance with Article 51(2) or (4) of Regulation (EU) No 468/2014 (ECB/2014/17)	3		15,000,000	Comment on submitted data
020	TOTAL ASSETS in accordance with Article 2, point (12)(b) or (c) of Regulation (EU) No 1163/2014 (ECB/2014/41)				
030	TOTAL ASSETS in accordance with Article 3(2)(b) of this Decision: Item 030 is equal to 031 minus 032 plus 033 minus 034				
031	Total assets of all group entities established in participating Member States - obligatory				
032	Intragroup positions among supervised entities established in participating Member States (from reporting packages used for the elimination of balances for group reporting purposes) - optional				
033	Goodwill included in the consolidated financial statements of the parent undertaking of a supervised group - obligatory				
034	Goodwill allocated to subsidiaries established in non-participating Member states or third countries - optional				

Please ensure that this template is completed in accordance with the instructions provided separately.

2. Where the reporting entity submits a TA figure in accordance with Article 2, point (12)(b) or (c) of Regulation (EU) No 1163/2014 (ECB/2014/41) it must complete row 010 for the “type of institution” column as follows:
 - Type of institution 4: supervised branches of credit institutions established in non-participating Member States which are not subject to mandatory reporting for prudential purposes (i.e. they do not fall directly under the scope of the ECB’s FINREP Regulation or under the scope of additional national FINREP reporting requirements).
 - Row 020, column 030 must be filled in with the value of the TA.
 - (i) The value of the total assets must be determined on the basis of the most recent audited annual accounts prepared in accordance with International Financial Reporting Standards (IFRS) as applicable within the Union in accordance with Regulation (EC) No 1606/2002 of the European Parliament and of the Council and, if those annual accounts are not available, the annual accounts prepared in accordance with applicable national accounting laws.
 - (ii) For fee-paying branches that do not prepare annual accounts, the total value of assets must be determined on the basis of the statistical data reported pursuant to Regulation (EC) No 25/2009 of the European Central Bank (ECB/2008/32)¹² (see Article 51(5) of Regulation (EU) No 468/2014 (ECB/2014/17)).

¹² Regulation (EC) No 25/2009 of the European Central Bank of 19 December 2008 concerning the balance sheet of the monetary financial institutions sector (ECB/2008/32) (OJ L 15, 20.1.2009, p. 14) updated by Regulation (EU) No 1071/2013 of the European Central Bank of 24 September 2013 concerning the balance sheet of the monetary financial institutions sector (ECB/2013/33) (OJ L 297, 7.11.2013, p. 1).

(iii) Branches compiling FINREP on a voluntary basis may use the TA figure calculated by following the FINREP instructions for filling in the fee factors template.

- The manager of the branch or, if the manager is unavailable, the management body of the credit institution establishing the fee-paying branch shall certify the fee-paying branch's total assets by means of a management letter submitted to the relevant NCA together with the TA fee factors template. A template for the management letter can be downloaded from the ECB Banking Supervision website: [Template for management letter](#).
- In row 020, column 020 the reporting entity must indicate whether the management letter has been submitted to the NCA by selecting Yes or No.

Example

CALCULATION OF FEES		Reference date	31/12/2019	NAME	Institution C
TOTAL ASSETS		Submission date	10/11/2020	MFI Code	IT0000003
				LEI code	
Item		Type of institution	Confirmation of auditor's verification or of management letter for fee-paying branches (Yes/No)	Total assets	Comments
		010	020	030	040
010	TOTAL ASSETS in accordance with Article 51(2) or (4) of Regulation (EU) No 468/2014 (ECB/2014/17)				
020	TOTAL ASSETS in accordance with Article 2, point (12)(b) or (c) of Regulation (EU) No 1163/2014 (ECB/2014/41)	4	Yes	5,000,000	Comment on submitted data
030	TOTAL ASSETS in accordance with Article 3(2)(b) of this Decision: Item 030 is equal to 031 minus 032 plus 033 minus 034				
031	Total assets of all group entities established in participating Member States - obligatory				
032	Intragroup positions among supervised entities established in participating Member States (from reporting packages used for the elimination of balances for group reporting purposes) - optional				
033	Goodwill included in the consolidated financial statements of the parent undertaking of a supervised group - obligatory				
034	Goodwill allocated to subsidiaries established in non-participating Member states or third countries - optional				

Please ensure that this template is completed in accordance with the instructions provided separately.

- Where the reporting entity submits a TA figure in accordance with Article 3(2)(b) of [Decision \(EU\) 2019/2158 of the European Central Bank \(ECB/2019/38\)](#), it must complete row 030 in the "type of institution" column as follows:
 - Type of institution 2: a supervised group that has notified the ECB of its intention to deduct the contributions of subsidiaries established in non-participating Member States or third countries from both TRE and TA.
 - Type of institution 5: a supervised group that has notified the ECB of its intention to deduct the contributions of subsidiaries established in non-participating Member States or third countries from TA only.
- The instructions below apply to institution types 2 and 5.
- Row 031, column 030 must be filled in with the value of the TA of all group entities established in participating Member States.
- Row 032, column 030 must be filled in with the value of intragroup positions among supervised entities established in participating Member States (taken

from reporting packages used for the elimination of balances for group reporting purposes). The cell can be left empty if no such positions exist.

- Row 033, column 030 must be filled in with the value of goodwill included in the consolidated financial statements of the parent undertaking of a supervised group. If the aforementioned value is zero, a zero has to be reported in this cell.
- Row 034, column 030 must be filled in with the value of goodwill allocated to subsidiaries established in non-participating Member states or third countries. The cell can be left empty if goodwill is zero.
- Row 030, column 030 does not have to be filled in (it contains an automatic formula, which is TA row 031, column 030 minus TA row 032, column 030 plus TA row 033, column 030 minus TA row 034, column 030). This figure represents the TA that will be taken into account when determining the fee factor.
- An auditor has to confirm that the calculation process does not deviate from the procedure laid down in [Decision \(EU\) 2019/2158 of the European Central Bank \(ECB/2019/38\)](#) and that the calculation performed by the fee debtor is consistent with the accounting method used to consolidate the accounts of the group of fee-paying entities.
- In row 020, column 020 the reporting entity must indicate whether the auditor's verification has been submitted to the NCA by selecting Yes or No.
- Reporting entities selecting "type of institution 2" or "5" in the TA template must have selected "type of institution 2" in the TRE template.

Example

CALCULATION OF FEES		Reference date	31/12/2019	NAME	Institution A
TOTAL ASSETS		Submission date	10/11/2020	MFI Code	IT0000001
				LEI code	ABCDEFGHIJ1234567890
Item		Type of institution	Confirmation of auditor's verification or of management letter for fee-paying branches (Yes/No)	Total assets	Comments
		010	020	030	040
010	TOTAL ASSETS in accordance with Article 51(2) or (4) of Regulation (EU) No 468/2014 (ECB/2014/17)				
020	TOTAL ASSETS in accordance with Article 2, point (12)(b) or (c) of Regulation (EU) No 1163/2014 (ECB/2014/41)				
030	TOTAL ASSETS in accordance with Article 3(2)(b) of this Decision: Item 030 is equal to 031 minus 032 plus 033 minus 034	2	Yes	14,080,000	Comment on submitted data
031	Total assets of all group entities established in participating Member States - obligatory			15,000,000	
032	Intragroup positions among supervised entities established in participating Member States (from reporting packages used for the elimination of balances for group reporting purposes) - optional			1,000,000	
033	Goodwill included in the consolidated financial statements of the parent undertaking of a supervised group - obligatory			100,000	
034	Goodwill allocated to subsidiaries established in non-participating Member states or third countries - optional			20,000	

Please ensure that this template is completed in accordance with the instructions provided separately.

CALCULATION OF FEES		Reference date	31/12/2019	NAME	Institution A
TOTAL ASSETS		Submission date	10/11/2020	MFI Code	IT0000001
				LEI code	ABCDEFGHIJ1234567890
Item		Type of institution	Confirmation of auditor's verification or of management letter for fee-paying branches (Yes/No)	Total assets	Comments
		010	020	030	040
010	TOTAL ASSETS in accordance with Article 51(2) or (4) of Regulation (EU) No 468/2014 (ECB/2014/17)				
020	TOTAL ASSETS in accordance with Article 2, point (12)(b) or (c) of Regulation (EU) No 1163/2014 (ECB/2014/41)				
030	TOTAL ASSETS in accordance with Article 3(2)(b) of this Decision: Item 030 is equal to 031 minus 032 plus 033 minus 034	5	Yes	14,080,000	Comment on submitted data
031	Total assets of all group entities established in participating Member States - obligatory			15,000,000	
032	Intragroup positions among supervised entities established in participating Member States (from reporting packages used for the elimination of balances for group reporting purposes) - optional			1,000,000	
033	Goodwill included in the consolidated financial statements of the parent undertaking of a supervised group - obligatory			100,000	
034	Goodwill allocated to subsidiaries established in non-participating Member states or third countries - optional			20,000	

Please ensure that this template is completed in accordance with the instructions provided separately.

4 Instructions for the “total risk exposure” (TRE) template¹³

For the special case of branches, the “total risk exposure” template is not required. Please refer to Section 3 for instructions on the “total assets” (TA) template.

All red cells in the template must be completed. The yellow cells in the template must be completed only when applicable. All fields marked in grey must be left blank. When selecting the type of institution in column 010, cells might change colour in order to guide the fee debtor when filling in the template.

The following information is contained in the headers:

- Reference date: 31 December of the preceding fee period for entities established before 1 January of the fee period or the next available reporting

¹³ Annex I of Decision (EU) 2019/2158 of the European Central Bank.

date: 31 March, 30 June or 30 September of the fee period for entities established after 1 January of the fee period.

- Submission date: this is a mandatory field and must be filled in with the day of submission of the TRE template.¹⁴
- Name of the institution or banking group: this is a mandatory field and must be filled in with the name of the fee debtor (the fee-paying credit institution/entity nominated as fee debtor for the whole group).
- “MFI code”¹⁵ of the fee debtor: this is a mandatory field for all fee debtors.
- “LEI code” of the fee debtor: this is a mandatory field for all fee debtors.
- Cells in row 010, column 010 must be completed with the institution type as follows:¹⁶
 1. Type of institution 1: a supervised group that has notified the ECB of its intention to deduct the contribution of subsidiaries established in non-participating Member States or third countries from TRE only.
 2. Type of institution 2: a supervised group that has notified the ECB of its intention to deduct the contribution of subsidiaries established in non-participating Member States or third countries from both TRE and TA.
 3. The instructions below apply to institution types 1 and 2.
 - Row 010, column 030 should be filled in with the value of the TRE.
 - Row 020, column 030 should be filled in with the sum of all contributions of subsidiaries established in non-participating Member States reported in COREP C 06.02, column 250.
 - Rows 1021 to N, column 030 should be filled in with the individual contributions of subsidiaries established in non-participating Member States not reported in COREP C 06.02 but listed in the “fee factors” template.
 - In accordance with Annex II, Part II of [Commission Implementing Regulation \(EU\) No 680/2014](#)¹⁷, “[a]n institution shall report data of the contribution of an entity when its contribution to the total risk exposure amount exceeds 1% of the total risk exposure amount of the group or when its contribution to the total own funds exceeds 1% of the total own funds of the group. This threshold does not apply in the case of subsidiaries or subgroups that provide own funds (in the form of minority

¹⁴ The submission date has to be updated in the event of resubmissions.

¹⁵ The MFI code is equivalent to the RIAD code. See [MFI data access](#) for more information.

¹⁶ Please note that the numbering system has been changed.

¹⁷ Commission Implementing Regulation (EU) No 680/2014 of 16 April 2014 laying down implementing technical standards with regard to supervisory reporting of institutions according to Regulation (EU) No 575/2013 of the European Parliament and of the Council (OJ L 191, 28.6.2014, p. 1).

interests or qualifying AT1 or T2 instruments included in own funds) to the group". Therefore, data on the contribution of subsidiaries established in non-participating Member States that are not already included in COREP template C 06.02 (Group Solvency) reported at the relevant year-end must be reported in row(s) 1021 to N, column 030.

- Row(s) 1021 to N should be filled in with the name(s) of the subsidiaries established in non-participating Member States (in the example below, the three entities that belong to "Institution A" have been added in as "Institution C1", "Institution C2" and "Institution C3").

Example

CALCULATION OF FEES		Reference date	31/12/2019	NAME	Institution A
TOTAL RISK EXPOSURE		Submission date	10/11/2020	MFI Code	IT0000001
				LEI code	ABCDEFGHJI1234567890
Item		Type of institution 010	Source for risk exposure amount 020	Risk exposure amount 030	Comments 040
010	TOTAL RISK EXPOSURE as calculated in accordance with Article 92(3) of Regulation (EU) No 575/2013 of the European Parliament and of the Council	1	COREP C 02.00, row 010	10,000,000	Comment on submitted data
020	CONTRIBUTION OF SUBSIDIARIES in non-participating Member States and third countries		COREP C 06.02, col 250 (SUM)	400,000	
1021	Institution C1			50,000	
1022	Institution C2			20,000	
1023	Institution C3			30,000	
1024					
1025					
030	TOTAL RISK EXPOSURE AMOUNT of the supervised group deducting the CONTRIBUTION OF SUBSIDIARIES in non-participating Member States and third countries: Item 030 is equal to 010 minus 020 minus sum of items 1021 to 1320			9,500,000	

Please ensure that this template is completed in accordance with the instructions provided separately.

In the example above, the TRE for the supervised group is €10,000,000 (TRE row 010, column 030).

However, the group deducts the contribution of its subsidiaries established in non-participating Member States. Subsidiaries with a contribution to the TRE that is higher than 1% of TRE have been included in COREP C 06.02. The sum of these contributions adds up to a total of €400,000 (TRE row 020, column 030).

Three subsidiaries with a contribution of less than 1% of TRE are reported in rows 1021, 1022 and 1023. The sum of these contributions adds up to a total of €100,000.

The TRE taken into account when determining the fee factor is given by the TRE calculated automatically in row 030, column 030. This is the result of deducting cell TRE row 020, column 030 and the sum of rows 1021 to 1023 from the original TRE in cell TRE row 010, column 030. In the example above, the result of this calculation is €9,500,000. This amount is taken into account as TRE when determining the fee factor.

The original TRE amount (€10,000,000 in the example above) will be compared for data quality purposes with the latest TRE (COREP, template C 02.00, row 010,

column 010) acquired by the ECB via the regulatory reporting. The risk exposure amount reported in row 020, column 030 will be compared with the values reported in template C 06.02 and obtained by the ECB via the regulatory reporting.

Reporting entities should ensure that the value included in the “fee factors” template is in line with the value transmitted in their regulatory reporting to their NCA. If reporting entities identify differences between the TRE value included in the “fee factors” template and the latest regulatory reporting transmitted to their NCA, the most up-to-date TRE value needs to be submitted to the NCA. If differences are identified in the course of the ECB’s data quality checks, a request will be made to the reporting entity (via its NCA) for these differences to be explained.

4. Type of institution 3: supervised entities and supervised groups which are not subject to mandatory reporting for prudential purposes shall determine the total risk exposure as defined in Article 2, point 13 of [Regulation \(EU\) No 1163/2014 of the European Central Bank \(ECB/2014/41\)](#).

Example

CALCULATION OF FEES TOTAL RISK EXPOSURE		Reference date	31/12/2019	NAME	Institution B
		Submission date	10/11/2020	MFI Code	IT0000002
				LEI code	ABCDEFGHIJ1234567890
Item		Type of institution 010	Source for risk exposure amount 020	Risk exposure amount 030	Comments 040
010	TOTAL RISK EXPOSURE as calculated in accordance with Article 92(3) of Regulation (EU) No 575/2013 of the European Parliament and of the Council	3	COREP C 02.00, row 010	10,000,000	Comment on submitted data
020	CONTRIBUTION OF SUBSIDIARIES in non-participating Member States and third countries		COREP C 06.02, col 250 (SUM)		
1021					
1022					
1023					
1024					
1025					
030	TOTAL RISK EXPOSURE AMOUNT of the supervised group deducting the CONTRIBUTION OF SUBSIDIARIES in non-participating Member States and third countries: Item 030 is equal to 010 minus 020 minus sum of items 1021 to 1320				

Please ensure that this template is completed in accordance with the instructions provided separately.

5 Auditor's verification for supervised groups that deduct non-SSM subsidiaries and management letter for fee-paying branches (column 020)

Confirmation of auditor's verification for supervised groups that deduct non-SSM subsidiaries

- The auditor must undertake an engagement to report on a specific element, account or item of the TA.
- Where a fee debtor uses statutory financial statements, an auditor must certify that the value of TA corresponds to the TA disclosed in the audited statutory financial statements of the single supervised entities. Where a fee debtor uses reporting packages, an auditor must certify the TA used for the calculation of the annual supervisory fees by carrying out an appropriate verification of the reporting packages used. In all cases, the auditor has to confirm that the aggregation process does not deviate from the procedure laid down in [Decision \(EU\) 2019/2158 of the European Central Bank \(ECB/2019/38\)](#) and that the calculation performed by the fee debtor is consistent with the accounting method used to consolidate the accounts of the group of fee-paying entities.

Management letter for fee-paying branches

- The requirement to submit the management letter applies to all branches, irrespective of the data used for the calculation of the supervisory fee (mandatory ECB or national FINREP, voluntary FINREP, annual IFRS or nGAAP accounts or statistical data – as per Article 2, point 12(d) of [Regulation \(EU\) No 1163/2014 of the European Central Bank \(ECB/2014/41\)](#)).
- 1. For branches that are subject to mandatory prudential reporting requirements, the requirement to “certify the fee-paying branch's total assets by means of a management letter submitted to the relevant NCA” is set out in Article 3(1)(b) of the [Decision \(EU\) 2019/2158 of the European Central Bank \(ECB/2019/38\)](#).

These branches should fill in the [Template for management letter](#) by choosing “Option 1: information as reported for prudential purposes” and “Text A” and submit it to their NCAs. As FINREP data is reused for such branches, only the management letter is expected from them.

- 2. For branches that are not subject to mandatory prudential reporting requirements, including branches that compile FINREP on a voluntary basis, the requirement to “certify the fee-paying branch's total assets by means of a management letter submitted to the relevant NCA” is set out in Article 3(3) of the [Decision \(EU\) 2019/2158 of the European Central Bank \(ECB/2019/38\)](#).

These branches should fill in the [Template for management letter](#) by choosing “Option 2: information as reported in ‘fee factors’ template (see Annex II to

Decision ECB/2019/38)” and “Text B” and submit it to their NCAs together with the TA fee factor template.