Conseil de Résolution

# Circular CSSF-CODERES 26/22

## Single Resolution Fund – Information request by the Single Resolution Board for the calculation of the 2027 contribution according to Articles 4 and 14 of Commission Delegated Regulation (EU) 2015/63

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## Single Resolution Fund – Information request by the Single Resolution Board for the calculation of the 2027 contribution according to Articles 4 and 14 of Commission Delegated Regulation (EU) 2015/63

To all credit institutions subject to Regulation (EU) No 806/2014 of the European Parliament and of the Council

Luxembourg, 29 September 2026

Ladies and Gentlemen,

The purpose of this circular is to collect data for the calculation of the 2027 contribution to the Single Resolution Fund.

Article 67 of Regulation (EU) No 806/2014 of the European Parliament and of the Council of 15 July 2014 establishing uniform rules and a uniform procedure for the resolution of credit institutions and certain investment firms in the framework of a Single Resolution Mechanism and a Single Resolution Fund and amending Regulation (EU) No 1093/2010 (hereinafter "SRMR") establishes a **Single Resolution Fund** (hereinafter "SRF") under the responsibility of the **Single Resolution Board** (hereinafter "SRB") for Member States participating in the SSM. Commission Delegated Regulation (EU) 2015/63 of 21 October 2014 supplementing Directive 2014/59/EU with regard to *ex-ante* contributions to resolution financing arrangements (hereinafter "DR") and Council Implementing Regulation (EU) 2015/81 of 19 December 2014 specifying uniform conditions of application of Regulation (EU) No 806/2014 of the European Parliament and of the Council with regard to *ex-ante* contributions to the Single Resolution Fund (hereinafter "CR") specify together the methodology for the calculation of this contribution and the obligations of the credit institutions[1] as regards the necessary information to be provided in a Single Resolution Mechanism context.

Article 69(4) of the SRMR, read in conjunction with Article 69(1) of that regulation, requires the raising of contributions to the SRF after the end of the initial period, where the amount of available financial means in the SRF diminishes below 1% of the amount of covered deposits of all credit institutions authorised in all of the Member States participating in the Banking Union (hereinafter "BU").[2]

Branches established in Luxembourg by institutions which have their head office outside the European Union are not targeted by this circular as they will be covered by the Luxembourg Resolution Fund.[3]

[1] In accordance with Article 4(1)(1) of Regulation (EU) 575/2013 credit institution means an undertaking the business of which is to take deposits or other repayable funds from the public and to grant credits for its own account.

[2] This means for Luxembourg: All credit institutions established in Luxembourg with the exception of the branches established in Luxembourg by a credit institution which has its head office outside the EU. Branches established in Luxembourg by a credit institution having its head office in another Member State, participating or not participating, are covered by their head office.

[3] See Article 108(1) of the Law of 18 December 2015 on the failure of credit institutions and certain investment firms and CSSF Regulation No 16-06.

As explained in the 2027 kick-off letter (see Annex 1), the SRB will verify in Q1 2027 whether the available financial means in the SRF are equal to at least 1% of covered deposits held in the BU. Based on the outcome of that verification exercise, the SRB will decide whether contributions to the SRF will be calculated and collected in the 2027 contribution period. The SRB needs, therefore, a certain amount of information as indicated in the 2027 kick-off letter (see Annex 1) and in its decision dated 9 September 2026 on data formats (see Annex 2).

The purpose of this circular is to launch this data collection exercise, which is done as in the previous year in XBRL format.[4]

In order to properly complete the required XBRL file, the SRB has provided the data reporting form along with guidance (see Annexes 3a, 3b and 4).

This information is also made available on the CSSF's website (www.cssf.lu) under:

Entity types > Credit institutions/Investment firms > Resolution > Circulars > Circular CSSF-CODERES 26/22> Details and related documents (direct link: https://www.cssf.lu/en/document/circular-cssf-coderes-26-22/).

**Deadlines**

The duly completed Data Reporting Form ("DRF") must be sent in XBRL format to the CSSF at the **latest by 15 January 2027 at 24:00 CET.** In case not all required information is transmitted correctly by that date, the SRB shall use estimates or its own assumptions for the calculation of the 2027 contribution of the concerned credit institution to the SRF (Article 17(1) DR). In specific cases, the SRB may assign the credit institution concerned to the highest risk adjusting multiplier, for the calculation of the institution's contribution to the SRF (Article 17(2) DR).

**Delivery instructions**

The transmission of data must be performed **via XBRL either through the API solution (S3 technology) or the eDesk digital portal**, from the credit institutions to the CSSF, as detailed in the "User Guide - Ex-ante Contributions Reporting" (see Annex 5). Before submitting the reporting form to the CSSF, credit institutions must check that the form complies with the validation rules of the XBRL taxonomy. The CSSF will then send the data via a XBRL-based portal to the SRB which will perform additional validation checks.

**Additional assurance documents for the 2027 collection period**

In addition, each credit institution that directly or as part of a group falls under direct ECB supervision (see Annex 6 for a list of institutions that meet this criterion as of 16 September 2026), unless it is subject to the lump-sum payment[5] and has not asked for the alternative contribution[6], must make available to the **resolution department of the CSSF additional assurance documents (hereinafter "AA")**, which will be transmitted to the SRB. The credit institutions must provide confirmation by an auditor on specific agreed-upon procedures (hereinafter "AUP") (see Annex 6a and Annex 6b).

In order to limit the operational and financial burden on credit institutions while safeguarding the objective of the additional assurance requirements, the effective application of the additional assurance requirements on the 2027 DRF is conditional on the SRB adopting a decision on the calculation and collection of contributions to the SRF based on the 2027 DRFs of the credit institutions

[4] Except for restatements up to 2022 which are still in Excel format.

[5] In accordance with Article 10(1)-(6) Commission Delegated Regulation (EU) 2015/63

[6] In accordance with Article 10(7) Commission Delegated Regulation (EU) 2015/63.

in scope in 2027.[7] Therefore, credit institutions are required to prepare the submission of the confirmation by an auditor based on AUP only upon the notification by the CSSF that such condition is fulfilled.

The conditional application refers only to the 2027 data and does not apply to data reporting forms to be submitted in the context of any restatements of data pertaining to the 2016-2023 contribution periods that may be submitted and processed in 2027.

In case where findings are identified, the AA documentation should explicitly report the field concerned and the amount that the credit institution should have reported. This will prevent the need for new AA submissions when submitting the restatement.

**Restatements**

In case restatements for the previous years must be taken into account, please inform or re-inform proactively the persons listed below of your intention to send these files and of the collection years concerned by 30 November 2026. The format to be used is XBRL.

For restatements, each credit institution that directly or as part of a group falls under direct ECB supervision, unless it is subject to the lump-sum payment, must make available to the **resolution department of the CSSF an AA** at the latest by 15 January 2027. More explicitly, and as previously mentioned, the conditional application for the 2027 data does not apply to the restatements.

However, for restatements of data pertaining to the 2016-2023 contribution periods (being processed in 2027), institutions may choose between providing an AUP report or a sign-off form, subject to the conditions set out in Annex 7a and Annex 7b. This flexibility applies specifically to historical data corrections and does not extend to the current 2027 contribution period.

In addition, by way of exception[8], a (new) AUP report from an auditor on the restated data point is not required under the following conditions:

- the restatement is due following an auditor's report in a previous cycle where the erroneous data point was identified;
- the same auditor's report expressly mentioned the former figure and the new value that should be resubmitted for the purpose of calculating the restatement; and
- this report is attached to the restated DRF.

The following naming convention shall be used for the AUP: "MFI_LEI_AUP_YEAR" or the sign-off form: "MFI_LEI_SOF_YEAR"

[7] The SRB will publish the verification results on its website and credit institutions are invited to consult this website regularly in the period February-March 2027

[8] See Annexes 7a and 7b page 2.

For any questions concerning this circular please contact the Reporting Resolution Team via reporting_res@cssf.lu.

Yours faithfully,

For the Resolution Board

Davy REINARD

Chairman of the Resolution Board

Annexes

- Annex 1 - 2027 kick off letter
- Annex 2 - Decision on the Data Reporting Form and Additional Assurance
- Annex 3a – 2027 Data reporting form (PDF version)
- Annex 3b – 2027 Data reporting form (Excel version)
- Annex 4 – 2027 Guidance
- Annex 5 – User Guide - Ex-ante Contributions Reporting - Version 1.5
- Annex 6a – Additional Assurance requirements 2027 (PDF version)
- Annex 6b – Additional Assurance requirements 2027 (Word version)

All annexes are accessible via the links at the end of this circular (direct link: https://www.cssf.lu/en/document/circular-cssf-coderes-26-22/).