CSSF guide concerning the submission of DORA Register of information

Version 1.0 – 23/04/2025

CSSF
Commission de Surveillance du Secteur Financier

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1. Introduction

The aim of this guide consists in assisting financial entities in resolving issues detected during the validation checks of the submitted DORA registers of information (RoI). This guide shall be read in conjunction with the 'Observations from testing of RoI reporting to the ESAs. Key common issues identified' document published by the ESA on 16 April 2025 ([Link](#)).

This guide is not intended to be exhaustive but covers the issues most commonly encountered in the validation checks of the RoI received during the first year of submission. It provides information based on current best knowledge and will be updated regularly. As it is evolving over time, the CSSF advises you to consult the latest version of this guide before contacting our helpdesks.

In case of any question, please feel free to contact by mail the different helpdesks of the CSSF:

Any technical issues, for instance with the on-boarding to CSSF eDesk platform shall be addressed to

edesk@cssf.lu

Any question related to the content of the register of information shall be addressed to

ICTRiskSupervision@cssf.lu

2. General information

2.1 Identification of financial entities and their third-party service provider

2.1.1 Type of Identifier

- Financial entities are identified under DORA via a Legal Entity Identifier (LEI).
- Third-party service providers located inside the EU are identified under DORA via a Legal Entity Identifier (LEI) or a European Unique Identifier (EUID).
- Third-party service providers located outside the EU are identified under DORA via a LEI.

2.1.2 Composition of a Legal Entity Identifier (LEI)

- A LEI consists of a 20-character alphanumeric string. The first four characters identify the Local Operating Unit (LOU) that has issued the LEI whereas Characters 5 to 18 are the unique alphanumeric string assigned to the financial entity. The final two characters are checksum digits.

2.1.3 Composition of a European Unique Identifier (EUID)

- The EUID has been introduced as a European standard alongside national business registers in 2017 by the European Commission.
- Its composition is the following:

Code	Format	Component
CC	2 Uppercase alphabetic characters	Country Code
RR...R$_{15}$	2 to 15 non-whitespace characters	Business Register Identifier
"."	Single dot character delimiter	
NNN...N$_{35}$	3 to 35 non-whitespace characters	Company Registration Number

2.1.4 GLEIF / BRIS database

- The ESA check the provided LEI or EUID against the GLEIF and BRIS databases.
- In case the provided ID is not contained in both databases, a warning message will be displayed.
- However, the submitted register will not be rejected.

Please refer also to the Top Errors #5 (page 17), Top Error #9 (page 22) and Top Error #12 (page 25) in the 'Observations from testing of RoI reporting to the ESAs – key common issues' document published by the ESA.

2.2 Difference between Warning and Error messages

This guide enumerates a certain number of requirements based on the published ITS on register of information (Link) and the technical specifications provided by the ESA (Link).

In case a non-compliance of the RoI is detected during the analysis of its content, an error message is shown. In this case, the submitted RoI is rejected, and financial entities shall fix the detected error(s) and resubmit their register in due time to the CSSF, which will submit the register to the ESA.

A warning message on the other hand indicates a detected non-compliance of the submitted register but without rejection. The financial entities may decide to fix the detected issue(s) and to re-submit their register to the CSSF. Any register re-submitted before end of May 2025 will be transmitted by the CSSF to the ESA.

Examples of warning or error messages

Please refer also to the list of Top 20 error codes which may lead to the rejection of the register described on page 5 in the 'Observations from testing of RoI reporting to the ESAs – key common issues' document published by the ESA.

3. Structure of the Register of Information

- The register of information to be submitted to the CSSF is composed of different folders and files. Those folders and files are grouped inside a .zip file.
- Only .zip files are accepted by the CSSF via its eDesk platform.
- Any RoI communicated to the CSSF which is not a valid .zip file will be rejected. This is for instance the case for any file for which the file extension is changed to .zip. Other compressed files like for instance .7z files will be rejected.

3.1 Naming convention of the .zip file

- The following naming convention has to be respected when submitting a register of information to the CSSF:

    LEI.IND_Country_Version_ReferenceDate_Timestamp.zip

    or

    LEI.CON_Country_Version_ReferenceDate_Timestamp.zip

  where:
  - LEI is the LEI code of the reporting financial entity composed of 18 characters and numbers followed by two check digits
  - CON or IND is the indication whether the file is being reported at consolidated (CON) or individual entity level (IND)
  - Country is the two-letter ISO code of the country of the submitting entity
  - Version is DORA010100 (constant for the reporting in 2025)
  - ReferenceDate is 2025-03-31 for the first reporting in 2025
  - Timestamp is the timestamp when the reporting file was created: YYYYMMDDHHMMSS000

Examples:

    DUMMYLEI123456789012.CON_IT_DORA010100_DORA_2025-03-31_20250421141632000.zip
    DUMMYLEI123456789012.IND_LU_DORA010100_DORA_2025-03-31_20250421141632000.zip

3.2 Content of the .zip file

Please refer also to the Top Error #10 described on page 23 in the 'Observations from testing of RoI reporting to the ESAs – key common issues' document published by the ESA.

- The main folder contained in the .zip file has the same name as the zip file but without the .zip extension
- The name of the folder is in uppercase

Example:

Name of the .zip file:
    DUMMYLEI123456789012.IND_LU_DORA010100_DORA_2025-03-31_20250421141632000.zip

Name of the folder:
DUMMYLEI123456789012.IND_LU_DORA010100_DORA_2025-03-31_20250421141632000

- The main folder contains two sub-folders 'reports' and 'META-INF'
- The name of those two sub-folders must not be modified and are case-sensitive
- Additional sub-folders are prohibited
- Additional files at sub-folder level are prohibited
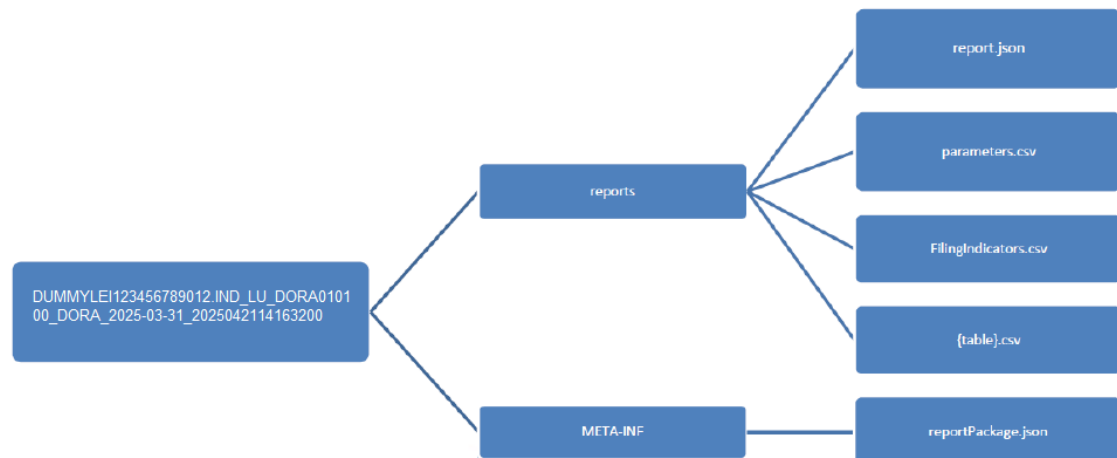
A non-compliance with this rule leads to the rejection of the submitted register.

3.2.1 Sub-folder META-INF

- The sub-folder 'META-INF' contains one file called 'reportPackage.json'.
- Any additional folder or file inside the sub-folder META-INF is prohibited
- The filename of the 'reportPackage.json' is case sensitive
- The 'reportPackage.json' file shall not be modified
- Content of the 'reportPackage.json' file:

```
{
  "documentInfo": {
    "documentType": "https://xbrl.org/report-package/2023"
  }
}
```

A non-compliance with this rule leads to the rejection of the submitted register.

3.2.2 Sub-folder reports

Please refer also to the Top Error #6 described on pages 18-19 and the additional information related to the Table.csv files on pages 27-28 in the 'Observations from testing of RoI reporting to the ESAs – key common issues' document published by the ESA.

The sub-folder 'reports' contains:
- the different b_xx.xx .csv files corresponding to the table files
- the 'FilingIndicators.csv' file
- the 'parameters.csv' file
- the 'report.json' file

Example :

Name	Date modified	Type
b_01.01.csv	27/03/2025 09:06	CSV File
b_01.02.csv	27/03/2025 09:06	CSV File
b_01.03.csv	27/03/2025 09:06	CSV File
b_02.01.csv	27/03/2025 09:06	CSV File
b_02.02.csv	28/03/2025 12:31	CSV File
b_02.03.csv	27/03/2025 09:07	CSV File
b_03.01.csv	27/03/2025 09:07	CSV File
b_03.02.csv	27/03/2025 10:44	CSV File
b_03.03.csv	27/03/2025 11:54	CSV File
b_04.01.csv	27/03/2025 09:07	CSV File
b_05.01.csv	27/03/2025 09:07	CSV File
b_05.02.csv	28/03/2025 09:49	CSV File
b_06.01.csv	13/12/2024 17:48	CSV File
b_07.01.csv	13/12/2024 17:48	CSV File
b_99.01.csv	13/12/2024 17:48	CSV File
FilingIndicators.csv	13/12/2024 17:48	CSV File
parameters.csv	13/12/2024 17:48	CSV File
report.json	13/12/2024 17:48	JSON File

- Any additional folder or file inside the sub-folder is prohibited leading to the rejection of the submitted register
- The sub-folder does not contain any .xls or .xlsx files
- All filenames are case sensitive
- The filename of the b_xx.xx.csv table files must be lower case e.g. b_01.01.csv
- Financial entities do not need to include all b_xx.xx.csv files (for instance in case a financial entity has no branches, file b_01.03.csv is not required to be included in the sub-folder). In this particular case, financial entities have to ensure that the requirements in the below section '3.2.2.2 FilingIndicators.csv' are respected.

A non-compliance with this rule leads to the rejection of the submitted register.

3.2.2.1 report.json

- The report.json file contained in the sub-folder 'reports' shall not be modified
- Content of the 'report.json' file:

```
{
    "documentInfo": {
        "documentType": "https://xbrl.org/2021/xbrl-csv",
        "extends": [
            "http://www.eba.europa.eu/eu/fr/xbrl/crr/fws/dora/4.0/mod/dora.json"
        ]
    }
}
```

A non-compliance with this rule leads to the rejection of the submitted register.

3.2.2.2 FilingIndicators.csv

Please refer also to the Top Error #4 described on page 16 and the additional information related to the FilingIndicators.csv file on page 26 in the 'Observations from testing of RoI reporting to the ESAs – key common issues' document published by the ESA.

- Content of the 'FilingIndicators.csv' file:

```
templateID,reported
B_01.01,true
B_01.02,true
B_01.03,true
B_02.01,true
B_02.02,true
B_02.03,true
B_03.01,true
B_03.02,true
B_03.03,true
B_04.01,true
B_05.01,true
B_05.02,true
B_06.01,true
B_07.01,true
B_99.01,true
```

- The content of the 'FilingIndicators.csv' file shall not be modified.
- Name of the file is case sensitive.
- All lines except the header contain the Boolean 'true' even if the financial entity will not report a given template (for instance in case the financial entity has no branches, file b_01.03.csv is not required).

A non-compliance with this rule leads to the rejection of the submitted register.

3.2.2.2 parameters.csv

Please refer also to the Top Error #8 described on page 21 and the additional information related to the parameters.csv file on page 26 in the 'Observations from testing of RoI reporting to the ESAs – key common issues' document published by the ESA.

- Content of the 'parameters.csv' file:

```
name,value
entityID,rs:DUMMYLEI123456789012.CON
refPeriod,2025-03-31
baseCurrency,iso4217:EUR
decimalsInteger,0
decimalsMonetary,-3
```

- The order of the header of the parameters.csv file is important - name first, value after
- The second row shall start with 'entityID,rs:' followed by the LEI of the entity submitting the register and '.CON' or '.IND'. In other words, the string shall be followed by the 24 first characters of the zip name.
- The reference period specified in line 3 shall be the same that the one specified in the filename of the .zip file. For the 2025 submission, the reference date is set to '2025-03-31'.

3.3 UTF-8 encoding

- All .csv and .json files shall be encoded in UTF-8 format. Files encoded in a different format (for instance ASCI) will be rejected.
- In order to check whether a given .csv file is encoded in UTF-8 under Microsoft Windows, please open the file via notepad.exe.

The following file has been encoded in UTF-8 format and will be accepted:
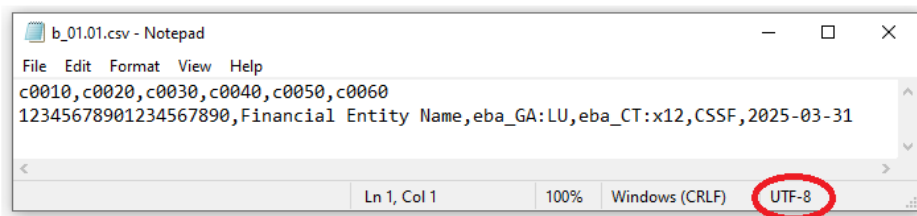
The following file has been encoded in ANSI format and will be rejected:
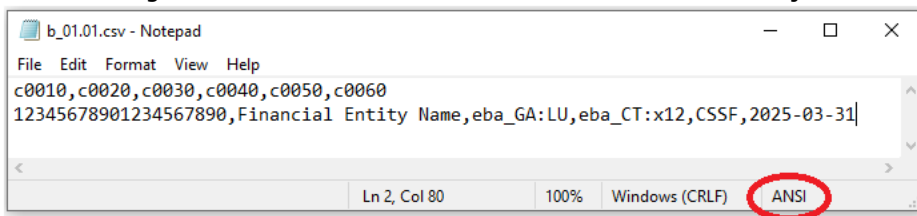
4. Content of a .csv file

4.1 Composition of a .csv file

- A .csv is composed of a header (first row) and the rows containing the value of the different data fields specified by the ITS on Register of information.

4.1.1 Header of a .csv file

Please refer also to the Top Error #11 described on page 21 and the additional information related to the parameters.csv file on page 24 in the 'Observations from testing of RoI reporting to the ESAs – key common issues' document published by the ESA.

- The header of a .csv file contains a list of the different columns c0010, c0020, …
- All columns in the header are separated via the comma symbol ','
- All column names in the header are in lower cases and start with the letter "c" followed by 4 digits
- No additional columns shall be added
- The header of a .csv file does not contain an empty value

- The columns contained in a header are incremented by 10 (c0010, c0020, c0030, …)

The Data Model for DORA RoI (Link) enumerates all the data fields defined in the ITS on register of information.

Example:

Template B.01.01 is composed of 6 different data fields:

Table	Column	Type	Length	PrimaryKey	ForeignKey	Nullable
B.01.01 — Financial entity maintaining the register of information	0010 - LEI of the entity maintaining the register of information	char	20	Yes	No	No
	0020 - Name of the entity	varchar	255	No	No	No
	0030 - Country of the entity	char	2	No	No	No
	0040 - Type of entity	varchar	255	No	No	No
	0050 - Competent Authority	varchar	255	No	No	No
	0060 - Date of the reporting	date	0	No	No	No

The header of the file b_01.01.csv will be: c0010,c0020,c0030,c0040,c0050,c0060

Examples of headers that will be rejected for file b_01.01.csv:

Header	Justification
C0010,C0020,C0030,C0040,C0050,C0060	Columns shall start with the lowercase letter 'c'
c0010,c0020,c0030,c0050,c0060	Missing column c0040
c0010,c0020,c0030,c0040,c0050,c0060,c0070	Column c0070 is impermissible, it does not exist in the data point model (DPM)
c0010;c0020;c0030;c0040;c0050;c0060	Wrong separator, only a comma is accepted as separator
b_01.01.c0010, b_01.01.c0020, b_01.01.c0030, b_01.01.c0040, b_01.01.c0050, b_01.01.c0060	Naming convention of the columns not respected

4.1.1.1 Special case: Table B_03.03

The file b_03.03.csv is the only template which contains a column 'c0031'.

Header of table b_03.03
c0010,c0020,c0031

The column name 'c0031' in table b_03.03 is not an error and should not be corrected.

A 'b_03.01.csv' file containing header c0010,c0020,c0030 will be rejected.

4.1.1.2 Special case: Table B_02.03 and B_03.01

The Data Model for DORA RoI specifies that templates B.02.02 and B.03.01 have only two columns.

Table	Column	Type	Length	PrimaryKey	ForeignKey	Nullable
B.02.03 — List of intra-group contractual arrangements	*0010 - Contractual arrangement with ICT intra-group service provider*	varchar	255	Yes	Yes	No
	0020 - Linked contractual arrangement with ICT third-party service provider	varchar	255	Yes	Yes	No
B.03.01 — Entities signing the Contractual Arrangements for receiving ICT service(s) or on behalf of the entities making use of the ICT service(s)	*0010 - Contractual arrangement reference number*	varchar	255	Yes	Yes	No
	0020 - LEI of the entity signing the contractual arrangement	char	20	Yes	Yes	No

In the annotated table for DORA published by the ESA a third column was added to both templates so that files b_02.03.csv and b_03.01.csv shall both have the following header: c0010,c0020,c0030

4.1.1.3 Special case : Table B_06.01

The ESA noted in FAQ#46(U) that there is a numbering error in the numbering of the column codes in Template B_06.01 in the ITS published in the EU Official Journal. In particular, data field B_06.01.0050 is missing in the column codes, resulting in the data fields being assigned erroneous column codes.

The ESA further noted that for reporting purposes, the data points included in the reporting technical package v4.0 for the ITS on the Registers of information should be considered. The data point model contains consecutive numbers of the data fields.

Following the renumbering of the columns, the header of file b_06.01.csv shall be: c0010,c0020,c0030,c0040,c0050,c0060,c0070,c0080,c0090,c0100

4.3 Order of the columns

Financial entities have to ensure that the number of columns contained in a .csv header corresponds to the ESA's specification.

The order of the columns however may vary e.g. they can come in any order. In this case, the financial entities have to ensure that the corresponding values follow the same order than the columns in the header.

Example of two different b.01.01.csv files that are accepted:

Example1:

```
c0010,c0020,c0030,c0040,c0050,c0060
1234567890123456789$,Financial Entity Name,eba_GA:LU,eba_CT:x12,CSSF,2025-03-31
```

Example2:

```
c0060,c0010,c0030,c0040,c0050,c0020
2025-03-31,1234567890123456789$,eba_GA:LU,eba_CT:x12,CSSF,Financial Entity Name
```

In both examples, column c0010 for instance contains the LEI of the financial entity and column c0020 its name.

Example of a b.01.01.csv file that is rejected:

```
c0010,c0030,c0040,c0050,c0060,c0020
1234567890123456789$,Financial Entity Name,eba_GA:LU,eba_CT:x12,CSSF,2025-03-31
```

In this example column c0010 contains the LEI of the financial entity but column c0020 the value '2025-03-31' instead of the financial entity's name.

5. .csv files

5.1 Data Field types

The "Data Model for DORA RoI" document (Link) published by the ESA lists the different types of the data fields contained in the register of information.

For certain of those types, certain requirements shall be respected which are described hereunder:

5.1.1 String (varchar)

In case the string value contains a separator ',' then this string value must be quoted with double quotes "".

Example: "Bank, branch of Germany"

5.1.2 Date

All dates must be specified in the format yyyy-mm-dd

The following values do not respect the date format and will be rejected:

Data field	Justification
31-12-2025	Date format yyyy-mm-dd not respected
2025-31-12	Rejected as date is provided in yyyy-dd-mm format
2025/12/31	Separator '/' not allowed
2025-01-31 00:00:00	Time must not be added to the date

5.1.3 Boolean

- A Boolean type must be either true, false, 1 or 0.
- The values 'true' or 'false' must be in lower case.

Value	Justification
TRUE	Rejected as not in lower case
True	Rejected as not in lower case

5.2 Enumerated type (Close set of options)

- For certain data fields, the ITS on register of information (Link) provides a list of specific values that financial entities shall use and the type of those data fields is specified as 'Closed of options'.

  Q&A#25 (Link) specifies that "The values to be reported in the drop-down data fields are explained in the ITS and these are the actual values in a human-readable format. However, for reporting purposes the values should be replaced by the codes provided in the data point model (DPM) preceding with prefix 'eba_' according to the filling rules.

  To help navigate all the codes associated with the values in the drop-down data fields, the ESAs prepared a mapping file providing all the values and their codes".

- Financial entities shall ensure that they chose a value from the corresponding drop-down list.

  Figure below shows the possible values for data field B.01.02.0040 in template B_01.02:

LIST0102040	DESC0102040
eba_CT:x310	issuers of asset-referenced tokens
eba_CT:x316	other financial entity
eba_CT:x315	securitisation repository
eba_CT:x314	crowdfunding service providers
eba_CT:x313	administrator of critical benchmarks
eba_CT:x312	credit rating agency
eba_CT:x311	institutions for occupational retirement provision
eba_CT:x320	insurance intermediaries, reinsurance intermediaries and ancillary insurance intermediaries
eba_CT:x309	insurance and reinsurance undertakings
eba_CT:x308	data reporting service providers
eba_CT:x307	managers of alternative investment funds
eba_CT:x300	payment institution
eba_CT:x306	trade repositories
eba_CT:x305	trading venues
eba_CT:x304	central security depository
eba_CT:x303	crypto-asset service providers
eba_CT:x302	electronic money institutions
eba_CT:x301	account information service providers
eba_CT:x643	Central counterparties (CCPs)
eba_CT:x639	Asset management companies
eba_CT:x599	Investment firms
eba_CT:x12	Credit institutions
eba_CT:x318	Non-financial entity: Other than ICT intra-group service provider
eba_CT:x317	Non-financial entity: ICT intra-group service provider

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- Values from the drop-down list are prefixed by 'eba_'.

- Financial entities shall ensure that they pick a value from a drop-down list associated to a given data field.

  In the above example, only the values 'eba_CT:xxx' from the above list are accepted for data field B.01.02.0040. An error message will automatically be raised in case a financial entity uses a value which is no contained in the drop-down list or uses a value from a different drop-down list.

- Financial entities shall enter the complete value (for instance 'eba_CT:x318' and not only the value 'x318')

5.3 Mandatory data fields

The ITS specify in column 'Fill-In Option' whether a given data field is mandatory or optional.

The fact whether a given data field is mandatory is also specified in the document 'Data Model for DORA RoI' (Link).

Example from Template B_01.01 based on the Data Model document:

Table	Column	Type	Length	PrimaryKey	ForeignKey	Nullable
B.01.01 — Financial entity maintaining the register of information	0010 - LEI of the entity maintaining the register of information	char	20	Yes	No	No
	0020 - Name of the entity	varchar	255	No	No	No
	0030 - Country of the entity	char	2	No	No	No
	0040 - Type of entity	varchar	255	No	No	No
	0050 - Competent Authority	varchar	255	No	No	No
	0060 - Date of the reporting	date	0	No	No	No

For all data fields in template B_01.01, the value of the column 'Nullable' is set to 'No' meaning that all those data fields are mandatory.

5.4 Key fields

5.4.1 Identification of Key Fields

The document 'Data Model for DORA RoI' (Link) specifies in column 'PrimaryKey' or 'ForeignKey' whether a given data field is a key field or not.

Example from Template B_01.01 based on the Data Model document :

Table	Column	Type	Length	PrimaryKey	ForeignKey	Nullable
B.01.01 — Financial entity maintaining the register of information	0010 - LEI of the entity maintaining the register of information	char	20	Yes	No	No
	0020 - Name of the entity	varchar	255	No	No	No
	0030 - Country of the entity	char	2	No	No	No
	0040 - Type of entity	varchar	255	No	No	No
	0050 - Competent Authority	varchar	255	No	No	No
	0060 - Date of the reporting	date	0	No	No	No

Key fields cannot be empty. A non-compliance with this rule leads to the rejection of the submitted register.

5.4.2 Identical Key values on open tables

Please refer also to the Top Error#7 described on page 20 in the 'Observations from testing of RoI reporting to the ESAs – key common issues' document published by the ESA.

As noted in the previous section 5.5.1, certain columns are defined as Key columns. In case a financial entity reports the same key twice, an error message will be raised and the submitted RoI will be rejected.

5.5 Missing data for Mandatory / Key fields

Please refer also to the Top Error#2 (pages 11-13) and Top Error#3 (pages 14-15) in the 'Observations from testing of RoI reporting to the ESAs – key common issues' document published by the ESA.

- The ESA specified in FAQ#26(U) that "If financial entities are not able to fill some data fields that are mandatory, they can leave these data fields blank (report empty values), unless the instructions to the data fields or responses to Q&A specify otherwise (please refer to responses to DORA Q&A 140, 141, 142, 143, 144, 145, 146, 147). "
- The answers to DORA Q&A 140-147 can be found in the Joint Q&A Register (Link).
- Empty mandatory fields will generate a Warning message during the data quality feedback. The submitted register however will not be rejected.

5.5.1 Missing or unknown LEI

FAQ#40 notes that "in case the LEI is not available for the ICT third-party provider (or its ultimate parent undertakings) registered in third countries, the financial entity should populate the data filed with any relevant value to avoid the file being rejected as failing the referential integrity check. In practice this could mean that the financial entity could use other identifiers available. The use of such identifiers will be highlighted as a data quality issue, but the files will not be rejected".

5.5.2 Country key fields

As the data fields B_02.02.0130, B_02.02.0150 and B_02.02.0160 are considered as key fields, they cannot be empty.

The ESA have defined for those 3 data fields a drop-down list so that all 3 fields should contain as value a code with prefix 'eba_'.

Table	Column	Type	Length	PrimaryKey	ForeignKey	Nullable
B.02.02 — Contractual Arrangements – Specific Information	0130 - Country of provision of the ICT services	char	2	Yes	No	No
	0140 - Storage of data	bit	0	No	No	Yes
	0150 - Location of the data at rest (storage)	char	2	Yes	No	No
	0160 - Location of management of the data (processing)	char	2	Yes	No	No

Example 1:

In case the Country of provision of the services is the country of Ireland, financial entities shall not enter 'Ireland' but the code 'eba_GA:IE' in fata field B_02.02.0130.

Example 2:

In case the mandatory key value is not known by the financial entities for one of those three fields, they shall specify the code 'eba_GA:qx2007' representing the value 'Not applicable'.

In case the three key fields do not contain a value from the corresponding drop-down list, an error message will be issued and the submitted register rejected.

6. Foreign Key Violations

Please refer also to the Top Error#1 described on pages 6-10 of the 'Observations from testing of RoI reporting to the ESAs – key common issues' document published by the ESA.

A data field is a foreign key meaning that the value of that data field shall be defined in a data field in the same or in another template. Is this not the case, an error message of type "Foreign Key Violation" will be issued leading to the rejection of the submitted register.

The ESA distinguish between two types of Foreign Key violation :
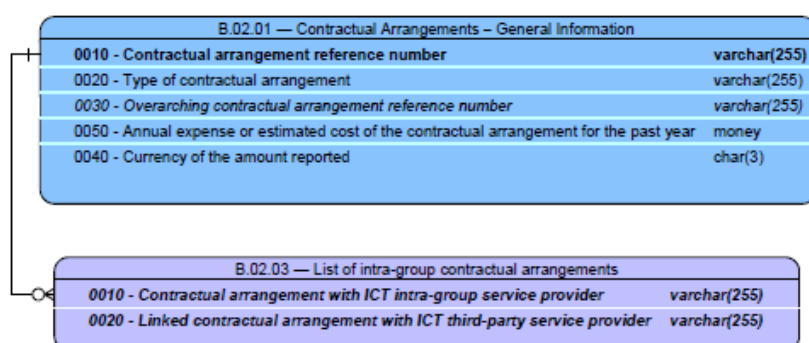
6.1 Foreign Key Violation - across tables

A Foreign Key Violation refers to a situation where a given data field contains a value which has not been defined in a primary key of another table.

Example:

- Table B_02.01 contains all the contractual arrangements signed with an Intra-Group entity or with an external TPPs. Each of those contractual arrangements are identified by a Contractual arrangement reference number.
- Table B.02.03 contains all Intra-Group entity contractual arrangements.
  Each contract in table B.02.02 shall be defined in table B_02.01. Is this not the case, an error message of type 'Foreign Key Violation - across tables' is displayed.

The dependency between the tables B_02.01 and B_02.03 or precisely between the data fields B.02.01.0010 and B_02.02.0010 are represented in the Data Model for DORA RoI document as follows:

6.2 Foreign Key Violation - self reference

Dependencies may also exist inside a single table.

Example:

Table B.02.01 contains all the contractual arrangements of the financial entity.

B.02.01 — Contractual Arrangements – General Information	
0010 - Contractual arrangement reference number	**varchar(255)**
0020 - Type of contractual arrangement	varchar(255)
0030 - Overarching contractual arrangement reference number	*varchar(255)*
0050 - Annual expense or estimated cost of the contractual arrangement for the past year	money
0040 - Currency of the amount reported	char(3)

- Column c0020 of table B_02.01 specifies the type of the contract : standalone arrangement, overarching / master contractual arrangement or subsequent or associated arrangement.
- In case column c0020 contains the value 'subsequent or associated arrangement', then column c0030 shall contain the contractual reference number of the overarching / master contractual arrangement.

In the above example, Column 0030 contains a reference to a contract which has to be specified in table B.02.01. Is this not the case, a Foreign Key Violation error message will be raised and the submitted register will be rejected.

7. Validation Rules

Please refer also to the Top Error#2 described on pages 11-13 in the 'Observations from testing of RoI reporting to the ESAs – key common issues' document published by the ESA.

The ESA have regrouped all the technical validation checks in the document 'Overview of the RoI reporting technical checks and validation rules (updated 10 March 2025)' (Link).

A non-compliance with these rules will trigger a warning message; the submitted register will however not be rejected.

7.1 DPM Business Validation Rules

DPM rules for Table B_01.01

Code	Description
e23677_e	All columns shall contain a value i.e. cannot be empty
v8872_m	In case column c0030 or c0040 or c0050 or c0060 contains a value then column c0020 shall not be empty.
v8873_m	In case column c0020 or c0040 or c0050 or c0060 contains a value then column c0030 shall not be empty.
v8874_m	In case column c0020 or c0030 or c0050 or c0060 contains a value then column c0040 shall not be empty.

Code	Description
v8875_m	In case column c0020 or c0030 or c0040 or c0050 contains a value then column c0050 shall not be empty.
v8876_m	In case column c0020 or c0030 or c0040 or c0050 contains a value then column c0060 shall not be empty.
v8890_m	The LEI provided in column c0010 shall have a length of 20.

DPM rules for Table B_01.02

Code	Description
e23676_e	Columns c0020-0090 cannot be empty
v22913_s	Value of column shall be >= 0
v8803_m	In case column c0110 is not empty, then column c0100 shall not be empty
v8804_m	In case the value of column c0040 is not 'eba_CT:x318' or 'eba_CT:x317' then column c0110 shall not be empty.
v8826_m	The LEI provided in column c0060 shall have a length of 20.
v8858_m	If the value of one of the columns c0030 or c0040 or c0050 or c0060 or c0070 or c0080 or c0090 or c0100 or c0110 contains a value then column c0020 shall not be empty.
v8859_m	If the value of one of the columns c0020 or c0040 or c0050 or c0060 or c0070 or c0080 or c0090 or c0100 or c0110 contains a value then column c0030 shall not be empty.
v8860_m	If the value of one of the columns c0020 or c0030 or c0050 or c0060 or c0070 or c0080 or c0090 or c0100 or c0110 contains a value then column c0040 shall not be empty.
v8861_m	If the value of one of the columns c0020 or c0030 or c0040 or c0060 or c0070 or c0080 or c0090 or c0100 or c0110 contains a value then column c0050 shall not be empty.
v8862_m	If the value of one of the columns c0020 or c0030 or c0040 or c0050 or c0070 or c0080 or c0090 or c0100 or c0110 contains a value then column c0060 shall not be empty.
v8863_m	If the value of one of the columns c0020 or c0030 or c0040 or c0050 or c0060 or c0080 or c0090 or c0100 or c0110 contains a value then column c0070 shall not be empty.
v8864_m	If the value of one of the columns c0020 or c0030 or c0040 or c0050 or c0060 or c0070 or c0090 or c0100 or c0110 contains a value then column c0080 shall not be empty.
v8865_m	If the value of one of the columns c0020 or c0030 or c0040 or c0050 or c0060 or c0070 or c0080 or c0100 or c0110 contains a value then column c0090 shall not be empty.
v8891_m	The LEI provided in column c0010 shall have a length of 20.

DPM rules for Table B_01.03

Code	Description
e23675_e	Columns cannot be empty
v8856_m	If columns c0030 is not empty then column c0040 shall not be empty.
v8857_m	If columns c0040 is not empty then column c0030 shall not be empty.
v8892_m	The LEI provided in column c0020 shall have a length of 20.

DPM rules for Table B_02.01

Code	Description
e23792_e	Columns c0020, c0040, c0050 cannot be empty
v22912_m	In case column c0020 contains 'eba_CO:x3' then column c0030 shall not be empty.
v23716_s	The value of column c0050 shall be >= 0
v8805_m	In case column c0020 contains 'eba_CO:x3' then column c0030 shall not be empty.
v8866_m	If one of the columns c0020, c0030 or c0040 is not empty then column c0050 shall not be empty.
v8867_m	If one of the columns c0020, c0030 or c0050 is not empty then column c0040 shall not be empty.
v8868_m	If one of the columns c0030, c0040 or c0050 is not empty then column c0020 shall not be empty.

DPM rules for Table B_02.02

Code	Description
e23680_e	Columns c004 to c0080 cannot be empty
v8816_m	Value of column c0080 shall be > then the value of column c0070
v8869_m	In case of the columns c0070, c0080, c0090, c0100, c0110, c0120, c0140, c0170 or c0180 contains a value then column c0040 shall not be empty.
v8870_m	In case of the columns c0040, c0080, c0090, c0100, c0110, c0120, c0140, c0170 or c0180 contains a value then column c0070 shall not be empty.
v8871_m	In case of the columns c0040, c0070, c0090, c0100, c0110, c0120, c0140, c0170 or c0180 contains a value then column c0080 shall not be empty.
v8893_m	The LEI provided in column c0020 shall have a length of 20.

DPM rules for Table B_03.01

Code	Description
v8894_m	The LEI provided in column c0020 shall have a length of 20.

DPM rules for Table B_03.03

Code	Description
v8895_m	The LEI provided in column c0020 shall have a length of 20.

DPM rules for Table B_04.01

Code	Description
e23683_e	Column c0030 shall not be empty.
v8896_m	The LEI provided in column c0020 shall have a length of 20.

DPM rules for Table B_05.01

Code	Description
e23674_e	Columns c0020, c0050, c0060, c0070, c0080 and c0110 shall not be empty.
v8817_m	In case column c0070 contains 'eba_CT:x212' then column c0020 shall contain 'eba_qCO:qx2000' or 'eba_qCO:qx2002'
v8818_m	In case column c0070 contains 'eba_CT:x212' then column c0040 shall contain 'eba_qCO:qx2000' or 'eba_qCO:qx2002'
v8821_m	If column c0020 contains 'eba_qCO:qx2000' then column c0010 shall contain a valid LEI
v8823_m	If column c0030 contains a value then column c0040 shall not be empty.
v8824_m	If column c0100 contains a value then column c0090 shall not be empty.
v8850_m	In case of the columns c0030, c0040, c0050, c0060, c0070, c0080, c0090, c0100, c0110 or c0120 contains a value then column c0020 shall not be empty.
v8851_m	In case of the columns c0020, c0030, c0040, c0060, c0070, c0080, c0090, c0100, c0110 or c0120 contains a value then column c0050 shall not be empty.
v8852_m	In case of the columns c0020, c0030, c0040, c0050, c0070, c0080, c0090, c0100, c0110 or c0120 contains a value then column c0060 shall not be empty.
v8853_m	In case of the columns c0020, c0030, c0040, c0050, c0060, c0080, c0090, c0100, c0110 or c0120 contains a value then column c0070 shall not be empty.

Code	Description
v8854_m	In case of the columns c0020, c0030, c0040, c0050, c0060, c0070, c0090, c0100, c0110 or c0120 contains a value then column c0080 shall not be empty.
v8855_m	In case of the columns c0020, c0030, c0040, c0050, c0060, c0070, c0080, c0090, c0100 or c0120 contains a value then column c0110 shall not be empty.

DPM rules for Table B_06.01

Code	Description
e23682_e	Columns c0020, c0030, c0050, c0070, c0080, c0090, c0100 shall not be empty.
v8877_m	In case of the columns c0030, c0050, c0060, c0070, c0080, c0090 or c0100 contains a value then column c0020 shall not be empty.
v8878_m	In case of the columns c0020, c0050, c0060, c0070, c0080, c0090 or c0100 contains a value then column c0030 shall not be empty.
v8879_m	In case of the columns c0020, c0030, c0060, c0070, c0080, c0090 or c0100 contains a value then column c0050 shall not be empty.
v8880_m	In case of the columns c0020, c0030, c0050, c0060, c0080, c0090 or c0100 contains a value then column c0070 shall not be empty.
v8881_m	In case of the columns c0020, c0030, c0050, c0060, c0070, c0090 or c0100 contains a value then column c0080 shall not be empty.
v8882_m	In case of the columns c0020, c0030, c0050, c0060, c0070, c0080 or c0100 contains a value then column c0090 shall not be empty.
v8883_m	In case of the columns c0020, c0030, c0050, c0060, c0070, c0080 or c0100 contains a value then column shall not be empty.
v8897_m	The LEI provided in column c0040 shall have a length of 20.

DPM rules for Table B_07.01

Code	Description
e23681_e	Columns c0050, c0070, c0080, c0090, c0100 and c0110 shall not be empty.
v8825_m	In case column c0050 contains the 'eba_ZZ:x959' or 'eba_ZZ:x960' then column c0060 shall not be empty.
v8884_m	If one of the columns c0030, c0060, c0070, c0080, c0090, c0100, c0110 or c0120 contains a value then column c0050 shall not be empty.
v8885_m	If one of the columns c0030, c0050, c0060, c0080, c0090, c0100, c0110 or c0120 contains a value then column c0070 shall not be empty.
v8886_m	If one of the columns c0030, c0050, c0060, c0070, c0090, c0100, c0110 or c0120 contains a value then column c0080 shall not be empty.

v8887_m	If one of the columns c0030, c0050, c0060, c0070, c0080, c0100, c0110 or c0120 contains a value then column c0090 shall not be empty.
v88889_m	If one of the columns c0030, c0050, c0060, c0070, c0080, c0090, c0100 or c0120 contains a value then column c0110 shall not be empty.
v8888_m	If one of the columns c0030, c0050, c0060, c0070, c0080, c0090, c0110 or c0120 contains a value then column c0100 shall not be empty.

7.2 Validation Rules related to LEI / EUID

Please refer also to the Top Error#5, Top Error#9, Top Error#12 described in the 'Observations from testing of RoI reporting to the ESAs – key common issues' document published by the ESA.

The identification of financial entities and their third-party service provider have been described in Section 2.1 of this document.

Some of the rules specified in the previous section only check whether the LEI code is a valid LEI based on its composition (a string of 18 followed by 2 check digits) and its length.

The ESA noted in their FAQ#44 (Link) that "the ITS on the registers of information requires LEI to be active. As part of the validation rules, LEIs are checked against an external database (GLEIF). This check will ensure that the LEI is a valid one in GLEIF. During the initial stages of the reporting of the registers of information and in particular in 2025, the ESAs will not be enforcing strict checks of the LEI status (e.g., active, lapsed, etc.)".

8 additional validation checks are performed by the ESA related to LEI and EUIDs.

Code	Description	Template / Column
VR_2	LEI code validity : LEI code needs to be a valid one according to the GLEIF database	b_01_01 / c0010
VR_12	LEI code validity: LEI code needs to be a valid one according to the GLEIF database	b_01_02 / c0010
VR_16	Country Code validity: Code needs to be a valid one according to the GLEIF database	b_01_02 / c0030
VR_23	LEI code validity: LEI code needs to be a valid one according to the GLEIF database	b_01_02 / c0060
VR_71	LEI code validity: LEI code needs to be a valid one according to the GLEIF database. Rule will only be checked in case b_05_01_c0020 = 'LEI'	b_05_01 / c0010
VR_72	EUID code validity: EUID code needs to be a valid one according to the BRIS. Rule will only be checked in case b_05_01_c0020 = 'EUID'	b_05_01 / c0010
VR_77	LEI code validity: LEI code needs to be a valid one according to the GLEIF database. Rule will only be checked in case b_05_01_c0040 = 'LEI'	b_05_01 / c0030

| VR_78 | EUID code validity: EUID code needs to be a valid one according to the BRIS. Rule will only be checked in case b_05_01_c0040 = 'EUID' | b_05_01 / c0030 |

In case a non-compliance with these rules are identified, a warning message will be displayed but the submitted register will not be rejected.