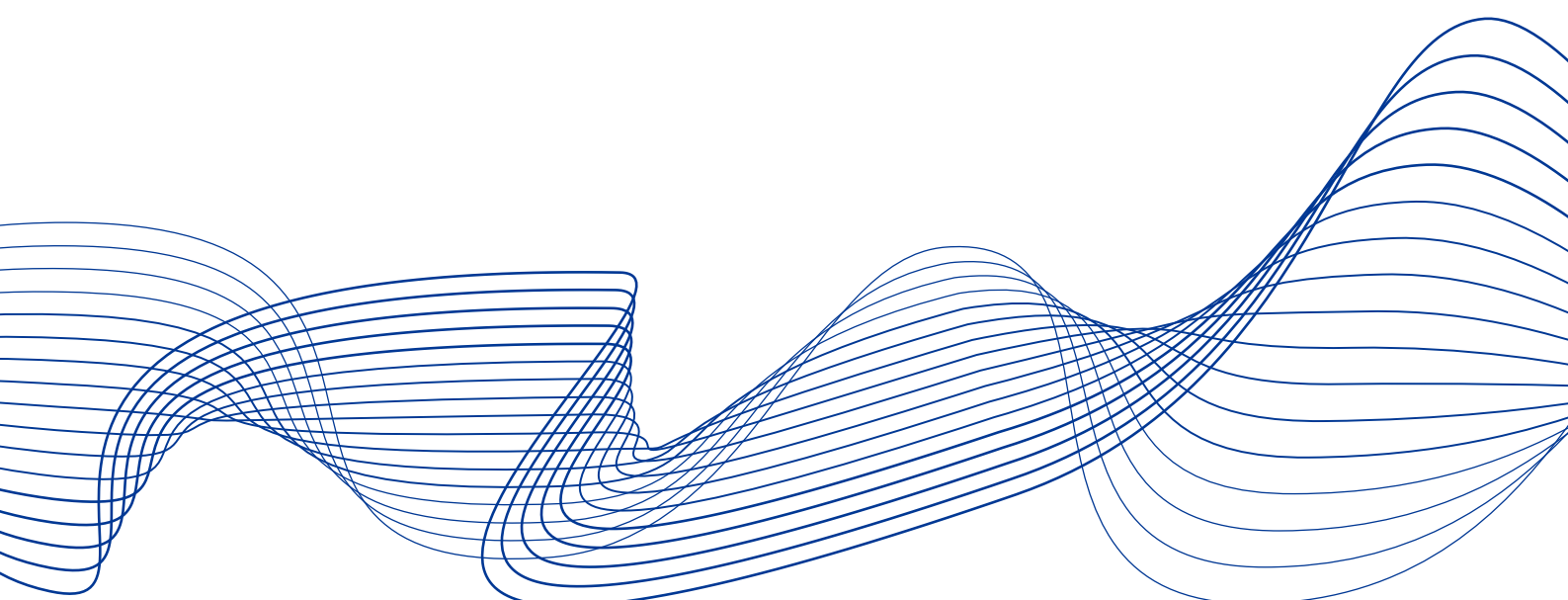


# Summary Compliance Report

March 2024

Summary  
Compliance Report on  
Recommendation B of the  
Recommendation of the European  
Systemic Risk Board of  
24 September 2020 on identifying  
legal entities (ESRB/2020/12)



**ESRB**

European Systemic Risk Board

European System of Financial Supervision

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# Introduction

**On 24 September 2020, the General Board of the European Systemic Risk Board (ESRB) adopted Recommendation ESRB/2020/12 on identifying legal entities (the “Recommendation”).** The Recommendation aims to ensure that all legal entities established in the European Union that are involved in financial transactions obtain and maintain a worldwide unique Legal Entity Identifier (LEI).

**In accordance with Article 17 of the ESRB Regulation<sup>1</sup> and the Recommendation, the addressees of Recommendation B** of the Recommendation were asked to deliver a report on their efforts to implement Recommendation B to the ESRB, the European Commission<sup>2</sup>, the European Parliament and the Council of the European Union by 31 December 2021. These reports were duly submitted to the ESRB Secretariat for assessment.

**This summary of the compliance report presents the outcome of the assessment of the reports pertaining to the implementation of Recommendation B by its addressees.**

**Recommendation B of the Recommendation contains three sub-recommendations.** While the first, B(1), is addressed to “relevant authorities”, sub-recommendations B(2) and B(3) are addressed to “authorities”. Under Section 2(1)(b) of the Recommendation, “authorities” are defined as follows:

- relevant authorities under Section 2(1)(a) of the Recommendation, meaning the national competent or supervisory authorities as specified in the Union acts referred to in Article 1(2) of Regulation (EU) No 1093/2010 of the European Parliament and of the Council<sup>3</sup>, Regulation (EU) No 1094/2010 of the European Parliament and of the Council<sup>4</sup> and Regulation (EU) No 1095/2010 of the European Parliament and of the Council<sup>5</sup>; the European Central Bank (ECB) under Article 9(1) of Council Regulation (EU) No 1024/2013<sup>6</sup>; designated authorities pursuant to Chapter 4 of Title VII of Directive 2013/36/EU of the European Parliament and of the Council<sup>7</sup> or Article 458(1) of Regulation (EU) No 575/2013; macroprudential authorities with the objectives, arrangements, tasks, powers, instruments, accountability requirements and

<sup>1</sup> Regulation (EU) No 1092/2010 of the European Parliament and of the Council of 24 November 2010 on European Union macro-prudential oversight of the financial system and establishing a European Systemic Risk Board (OJ L 331, 15.12.2010, p. 1).

<sup>2</sup> In the case of Iceland, Norway and Liechtenstein, to the Standing Committee of the EFTA States.

<sup>3</sup> Regulation (EU) No 1093/2010 of the European Parliament and of the Council of 24 November 2010 establishing a European Supervisory Authority (European Banking Authority), amending Decision No 716/2009/EC and repealing Commission Decision 2009/78/EC (OJ L 331, 15.12.2010, p. 12).

<sup>4</sup> Regulation (EU) No 1094/2010 of the European Parliament and of the Council of 24 November 2010 establishing a European Supervisory Authority (European Insurance and Occupational Pensions Authority), amending Decision No 716/2009/EC and repealing Commission Decision 2009/79/EC (OJ L 331, 15.12.2010, p. 48).

<sup>5</sup> Regulation (EU) No 1095/2010 of the European Parliament and of the Council of 24 November 2010 establishing a European Supervisory Authority (European Securities and Markets Authority), amending Decision No 716/2009/EC and repealing Commission Decision 2009/77/EC (OJ L 331, 15.12.2010, p. 84).

<sup>6</sup> 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).

<sup>7</sup> Directive 2013/36/EU of the European Parliament and of the Council of 26 June 2013 on access to the activity of credit institutions and investment firms, amending Directive 2002/87/EC and repealing Directives 2006/48/EC and 2006/49/EC (OJ L 176, 27.6.2013, p. 338).



other characteristics set out in Recommendation ESRB/2011/3<sup>8</sup>; and resolution authorities designated by Member States pursuant to Directive 2014/59/EU of the European Parliament and of the Council<sup>9</sup>;

- the European Banking Authority (EBA);
- the European Insurance and Occupational Pensions Authority (EIOPA);
- the European Securities and Markets Authority (ESMA);
- the Single Resolution Board.

**The assessment covers mainly the actions undertaken by the addressees between November 2020** (the publication date of the Recommendation) and December 2021 (the deadline for submission of the reporting templates), although it also considers the actions reported by addressees beyond the submission deadline, further to the written procedure of the Advisory Technical Committee (ATC) allowing addressees to submit the relevant information after December 2021.<sup>10</sup>

**The reports were scrutinised by an Assessment Team consisting of six assessors, including one Chair, and endorsed by the Advisory Technical Committee (ATC) of the ESRB (see Annex I).** The process followed the methodology set out in the Handbook on the assessment of compliance with ESRB recommendations of April 2016<sup>11</sup> (the “Handbook”).

**Overall, the Assessment Team observed a relatively high level of compliance with Recommendation B.**

**This report is structured as follows:** Part I recaps the policy objectives taken into account during the process of drafting the Recommendation. Part II summarises the methodology set out in the Handbook, which establishes the procedure for assessing compliance with ESRB recommendations and presents the implementation standards drafted by the Assessment Team and used to assess compliance with Recommendation B among addressees. Part III contains a summary of the findings, concerning the assessments of compliance with Recommendation B among addressees. Part IV discusses the overall findings of the assessment. Finally, Part V concludes the assessment of Recommendation B.

Annex I lists the members of the Assessment Team. Annex II contains the implementation standards and Annex III presents a detailed colour-coded table showing the results obtained by all addressees for each sub-recommendation of Recommendation B.

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<sup>8</sup> Recommendation ESRB/2011/3 of the European Systemic Risk Board of 22 December 2011 on the macro-prudential mandate of national authorities (OJ C 41, 14.2.2012, p. 1).

<sup>9</sup> Directive 2014/59/EU of the European Parliament and of the Council of 15 May 2014 establishing a framework for the recovery and resolution of credit institutions and investment firms and amending Council Directive 82/891/EEC, and Directives 2001/24/EC, 2002/47/EC, 2004/25/EC, 2005/56/EC, 2007/36/EC, 2011/35/EU, 2012/30/EU and 2013/36/EU, and Regulations (EU) No 1093/2010 and (EU) No 648/2012, of the European Parliament and of the Council (OJ L 173, 12.6.2014, p. 190).

<sup>10</sup> See ATC/WP/2022/008. ATC members were asked to forward the final reporting template to the authorities of their relevant national jurisdictions with regard to the Recommendation and submit the completed reporting templates to the ESRB Secretariat through Darwin by close of business 4 March 2022.

<sup>11</sup> **Handbook on the assessment of compliance with ESRB recommendations**, ESRB Secretariat, April 2016.



# 1 Policy objectives

**The Recommendation aims to ensure that all legal entities established in the European Union and involved in financial transactions obtain and maintain a worldwide unique Legal Entity Identifier (LEI). It also underscores the importance for financial stability of correctly identifying all non-financial entities.** Although the adoption of the LEI in the European Union has been largely driven by regulatory requirements laid down in financial legislation, such as Regulation (EU) No 648/2012 (commonly referred to as EMIR), Regulation (EU) No 600/2014 (commonly referred to as MiFIR), Regulation (EU) 2015/2365 of the European Parliament and of the Council<sup>12</sup> and Regulation (EU) No 909/2014 of the European Parliament and of the Council<sup>13</sup>, there is still no uniform approach across markets when it comes to the use of the LEI. Moreover, whereas most parent entities of global systemically important institutions (G-SII) groups have an LEI, coverage does not typically cascade down to all international subsidiaries and branches, or to all counterparties. Notably, the use of the LEI does not currently extend to non-financial sectors, leaving LEI coverage fragmented and important sectors excluded.

**Clear identification of individual entities across all sectors and the connections between them is a key requirement for drawing a reliable map of the global economic and financial landscape, which is a necessary step in order to reduce contagion stemming from the intricate, tightly knit and extremely complex network of financial transactions created by such a vast number of cross-border contracts.** The economic and financial effects of the coronavirus pandemic (COVID-19) and ensuing crisis illustrate the close interlinkages between the non-financial and financial sectors. Enabling the correct identification of non-financial entities is therefore equally as important to financial stability as the correct identification of financial entities. To achieve the systematic use of the LEI by entities engaged in financial transactions, the Recommendation seeks to usher in a Union legal framework to uniquely identify legal entities engaged in financial transactions by assigning them an LEI and making the use of this identifier more systematic when it comes to supervisory reporting and public disclosure. Taking into account the time frame for the adoption of such a Union framework, the ESRB recommends that relevant authorities pursue and systematise their efforts to promote the adoption and use of the LEI by relying on the various regulatory or supervisory powers they have been granted under national or Union law.

The Recommendation also underlines the importance of addressing the cost aspect of the LEI to allow full coverage while respecting the principle of proportionality. It suggests that business registries across the Union could play a meaningful role in allocating LEIs, in what would likely be an automated process, thus allowing for full coverage at a very low cost.

**For these reasons, Recommendation B of Recommendation ESRB/2020/12 calls on the relevant authorities to promote the use of the LEI** by requiring entities under their supervisory

<sup>12</sup> Regulation (EU) 2015/2365 of the European Parliament and of the Council of 25 November 2015 on transparency of securities financing transactions and of reuse and amending Regulation (EU) No 648/2012 (OJ L 337, 23.12.2015, p. 1).

<sup>13</sup> Regulation (EU) No 909/2014 of the European Parliament and of the Council of 23 July 2014 on improving securities settlement in the European Union and on central securities depositories and amending Directives 98/26/EC and 2014/65/EU and Regulation (EU) No 236/2012 (OJ L 257, 28.8.2014, p. 1).



remit to have one, to the extent permitted by law and pending any action taken by the Commission to comply with Recommendation A, as well as the possible introduction of corresponding Union legislation. It likewise recommends that the authorities, when drafting, imposing or amending financial reporting obligations, continue to include in such obligations an obligation to identify the subject in the form of an LEI, and that they continue to identify any legal entity about which they publicly disclose information by including its LEI.

## Content and structure

### **Recommendation ESRB/2020/12 is divided into two recommendations (A and B):**

Recommendation A is addressed to the Commission, while recommendation B is addressed to both relevant authorities and authorities. This report and its analysis focus on recommendation B (sub-recommendations B(1), B(2) and B(3)), for which the reporting deadline was the end of 2021.

### **Recommendation B – Use of the Legal Entity Identifier until the possible introduction of Union legislation**

Pending any action taken by the Commission to comply with recommendation A and the possible introduction of corresponding Union legislation, it is recommended that to the extent permitted by law and subject to the principle of proportionality:

1. the relevant authorities require or, where applicable, continue to require, all legal entities involved in financial transactions under their supervisory remit to have an LEI;
2. the authorities, when drafting, imposing, or amending financial reporting obligations include or, where applicable, continue to include, in such obligations an obligation to identify by way of an LEI:
  - the legal entity subject to the reporting obligation; and
  - any other legal entity about which information must be reported and which has an LEI;
3. the authorities identify or, where applicable, continue to identify, by way of its LEI, any legal entity about which they publicly disclose information and which has an LEI.



## 2 Assessment methodology

**Recital (20) and Article 17 of the ESRB Regulation provide the ESRB with a mandate to monitor compliance with ESRB recommendations among addressees.** To this effect, and pursuant to Article 20 of the ESRB Rules of Procedure<sup>14</sup>, the ESRB assesses the actions and justifications undertaken and communicated by the addressees of ESRB recommendations in accordance with the “act or explain” mechanism described in Article 17 of the ESRB Regulation, whereby the addressee of a recommendation should either (i) take action in response to a recommendation, or (ii) adequately justify any inaction. The ESRB thus analyses the information provided by addressees and assesses whether the action taken duly achieves the objectives of the Recommendation, or whether the justification provided for inaction is sufficient. Following this analysis, a final compliance grade is assigned to each addressee, reflecting the extent to which it has implemented the recommendations.

**The assessment was based on the submissions made by the addressees by the reporting deadline specified in Section 2 of the Recommendation (i.e. 31 December 2021) and on further dialogue between the Assessment Team and addressees during the assessment process.** As a considerable number of reporting templates had yet to be delivered at the time this assessment process began, addressees were granted a further period in which to submit their responses through the ATC written procedure, which ran until 4 March 2022 (ATC/WP/2022/008).

**The detailed procedure for the assessment of compliance is set out in the Handbook.**

Recommendation B was assessed by an Assessment Team comprising six assessors, with one Chair, endorsed by the ATC (see Annex I). The Assessment Team conducted a four-eyes review, whereby the compliance of each addressee was appraised by two assessors.

**To ensure equal treatment among addressees and the highest possible degree of transparency and consistency, the Assessment Team conducted its work in accordance with the following six assessment principles described in Section 4 of the Handbook:**

- fairness, consistency and transparency – equal treatment of all addressees throughout the assessment process;
- efficiency and appropriateness of procedures with regard to available resources, while ensuring high-quality deliverables;
- four-eyes review – compliance of each addressee is assessed by at least two assessors who have not been directly involved in assessing the performance of the national authorities they come from;
- effective dialogue – communication with the addressees is essential so as to fill in information gaps on compliance;

<sup>14</sup> Decision of the European Systemic Risk Board of 20 January 2011 adopting the Rules of Procedure of the European Systemic Risk Board (ESRB/2011/1) (OJ C 58, 24.2.2011, p. 4).



- principle of proportionality – actions to be taken by the addressees are country-specific and relative to the intensity of risks targeted by the recommendation in the specific Member State; and
- ultimate objective – prevention and mitigation of systemic risks to financial stability in the European Union.

**Furthermore, all the addressees were given the opportunity to provide further explanation and information.** Thanks to the communication channels in place between the Assessment Team and the addressees, most of the addressees provided further details during the assessment process, especially in the context of the remedial dialogue,<sup>15</sup> thus allowing the Assessment Team to review its preliminary assessment in light of the additional information provided by the addressees. In particular, all addressees who received a partially compliant (PC) grade or worse for one or more sub-recommendations were given the opportunity to provide further explanations and information. The results were subsequently cross-checked to prepare the final assessment.

## 2.1 Assessment criteria and implementation standards

**The assessment criteria used in this evaluation are based on best practices established in previous assessments of compliance with ESRB recommendations. To ensure a consistent and fair analysis, the Assessment Team developed implementation standards for each sub-recommendation against which the responses submitted by the addressees were assessed (see Annex II).** The assessment criteria describe the actions required of addressees to achieve the objectives of the recommendations. With this in mind, the Assessment Team took due account of the implementation criteria set out in Section 2(2) of the Recommendation. Grading was then guided by the relevant implementation standards, which explain how different actions or inaction for each sub-recommendation should be reflected in the final grade.

**While conducting the assessment, the Assessment Team analysed the content/substance of the actions taken by each addressee to assess whether they had complied with all elements of the Recommendation.** Notably, the Assessment Team awarded a sufficiently explained (SE) grade to addressees such as macroprudential authorities – as defined under Section 2 (1)(a)(iv) of the Recommendation – whose compliance could not be assessed because the actions recommended did not fall within their remit due to their respective legal mandates (such as where the authority concerned had no direct supervisory powers over legal entities involved in financial transactions).

Moreover, the Assessment Team looked at the extent to which addressees had followed the EIOPA Guidelines on the Legal Entity Identifier<sup>16</sup>, awarding a fully compliant (FC) grade where it was observed that the addressees had acted in absolute accordance with the EIOPA Guidelines. The

<sup>15</sup> The preliminary findings of the Assessment Team were shared and discussed with the addressees during the remedial dialogue that took place from 25 July to 26 August 2022. When analysing the submissions, the Assessment Team also considered any additional information shared by the addressees after this period, to the extent that the late submission was considered justifiable.

<sup>16</sup> Revised Guidelines on Legal Entity Identifier (LEI) (EIOPA-BoS-14-026), available on EIOPA's website at [https://www.eiopa.europa.eu/system/files/2022-03/eiopa\\_revised\\_lei\\_guidelines.pdf](https://www.eiopa.europa.eu/system/files/2022-03/eiopa_revised_lei_guidelines.pdf).





main requirements under the EIOPA Guidelines concern the scope of those legal entities for which the authorities should insist on an LEI.

## 2.2 Grading methodology

**The Assessment Team followed the four-step grading methodology set out in the Handbook to assign a single grade to each addressee reflecting its compliance with the relevant sub-recommendation of the Recommendation.** This methodology is needed to ensure full transparency of the single overall compliance grade and to make the entire assessment process as objective as possible, while still allowing room for high-quality expert judgement, which can be easily located and scrutinised to understand the rationale behind the allocation of specific overall grades. **The Assessment Team agreed on the criteria to be applied when assessing each element of the Recommendation and the weights assigned to each criterion.**

### Step I

Each sub-recommendation or compliance criterion was first assessed and graded based on the implementation standards established by the Assessment Team, by looking at the actions undertaken by each addressee (FC/LC/PC/MNC or NC, as defined in Table 1 below) or otherwise their inaction (SE or IE, as also defined in Table 1 below) by each addressee.



Table 1

**Grading scale**

**Grading scale for action**

<b>Fully compliant (FC)</b>	The addressee complies entirely with the Recommendation.
<b>Largely compliant (LC)</b>	The objectives of the Recommendation have been met almost entirely and only negligible requirements are still to be implemented.
<b>Partially compliant (PC)</b>	The most important requirements have been met. There are certain deficiencies that affect the implementation process, although this does not result in a situation where the Recommendation has not been acted on.
<b>Materially non-compliant (MNC)</b>	Requirements have been fulfilled to a limited degree, resulting in significant deficiencies in the implementation.
<b>Non-compliant (NC)</b>	Almost none of the requirements have been met, even if steps have been taken towards implementation.

**Grading scale for inaction**

<b>Sufficiently explained (SE)</b>	A complete and well-reasoned explanation for the lack of implementation has been provided. If one or more of the sub-recommendations are intended to address a particular systemic risk that does not affect a particular addressee, this justification or explanation may be considered sufficient.
<b>Insufficiently explained (IE)</b>	The explanation given for the lack of implementation is not sufficient to justify inaction.



## Step II

The compliance grades for each sub-recommendation or compliance criterion were subsequently converted into numerical grades, as follows.

Table 2

### Conversion of compliance grades into numerical grades

Compliance grade	Numerical grade
<b>Action</b>	
<b>FC</b>	1
<b>LC</b>	0.75
<b>PC</b>	0.50
<b>MNC</b>	0.25
<b>NC</b>	0
<b>Inaction</b>	
<b>SE</b>	1
<b>IE</b>	0

## Step III

The numerical grades were then weighted and aggregated into a single, overall numerical grade showing the degree of compliance with Recommendation B. When allocating the weights, the Assessment Team took into consideration the importance of each element of the Recommendation in relation to the achievement of the policy objectives as outlined in Section 1 of this report.

The team also took account of the fact that Recommendation B encompasses two categories of addressees: (i) relevant authorities, who are the addressees of sub-recommendations B(1), B(2) and B(3), and (ii) authorities, who are the addressees of sub-recommendations B(2) and B(3). Therefore, sub-recommendation B(1) was not counted when calculating the final compliance grade for authorities which are not relevant authorities (ECB, EBA, EIOPA, ESMA and SRB).

The final weights established by the Assessment Team are set out in Table 3 below.



Table 3

**Weights of key elements**

Compliance criteria for relevant authorities	Weight
Sub-recommendation B(1)	30%
Sub-recommendation B(2)	30%
Sub-recommendation B(3)	30%
Reporting	10%
Compliance criteria for authorities (excluding relevant authorities)	Weight
Sub-recommendation B(2)	45%
Sub-recommendation B(3)	45%
Reporting	10%

**Step IV**

Lastly, the overall compliance grade was determined by converting the single numerical grade for the entire Recommendation into a final compliance grade using the conversion table below.

Table 4

**Conversion of numerical grades into compliance grades**

Numerical grade for Recommendation B	Compliance grade
0.90 - 1.00	FC
0.67 - 0.90	LC
0.40 - 0.67	PC
0.158 - 0.40	MNC
0.00 - 0.158	NC

The level of compliance was then expressed in colour-coded form, as follows.



Table 5  
**Colour codes for levels of compliance**

Positive grades	Mid-grade	Negative grades
FC – Actions taken fully implement the Recommendation		MNC – Actions taken implement only a small part of the Recommendation
LC – Actions taken implement almost all of the Recommendation	PC – Actions taken implement only part of the Recommendation	NC – Actions taken are not in line with the nature of the Recommendation
SE – No actions were taken but the addressee provided sufficient justification		IE – No actions were taken and the addressee did not provide sufficient justification

## 2.3 Issues encountered during the assessment

When conducting the assessment, the Assessment Team encountered various issues, which are presented in this section. The issues were extensively discussed by the Assessment Team, which then agreed on the relevant criteria to be applied. To resolve the first issue, which related to the high number of addressees of the Recommendation, in some cases the Assessment Team had to rely on the self-assessment of relevant authorities to determine whether such addressees, or others belonging to that jurisdiction, fell within the definition of “relevant authorities”, as specified in the Recommendation under Section 2(1). As this was indeed the case for numerous Financial Intelligence Units (FIUs) and Deposit Guarantee Funds (DGFs), the Assessment Team opted to exclude such entities from the assessment whether or not they might otherwise have qualified as “relevant authorities”.

Moreover, the Assessment Team observed during the first round of assessment that a considerable number of addressees had failed to submit a response to the ESRB, or, where they had submitted a response, had provided incomplete and/or unclear answers regarding the actions they had undertaken. Consequently, the Assessment Team decided that those addressees that had not reported their actions to the ESRB, together with those that had been awarded a partially compliant grade or below for one or more of the sub-recommendations, should take part in the remedial dialogue phase. In this phase, addressees were given a further opportunity to provide the ESRB with the necessary information on the actions taken towards the Recommendation, or otherwise to provide further clarification regarding their situation.

The Assessment Team found that in some cases the addressees had failed to implement the actions described under the Recommendation but had provided adequate justification for their inaction. In these cases, the Assessment Team agreed on the approach to be adopted and decided that a sufficiently explained (SE) grade should be awarded when the macroprudential authorities (as defined under Section 2(1)1(a)(iv) of the Recommendation) justified their inaction on the



grounds of having no authority to act according to their legal mandates (such as where the authority concerned claimed to have no direct supervisory powers over legal entities involved in financial transactions).

Lastly, it should be noted that certain addressees failed to deliver their reports by the deadlines and were subsequently hard to reach during the remedial dialogue phase, although most addressees that had failed to respond during the initial reporting phase did respond during the remedial dialogue phase. Notably, the Portuguese Deposit Guarantee Scheme did not provide a response during the remedial dialogue phase. The Assessment Team decided not to include this addressee in this compliance report as it concerns a guarantee fund and in other similar cases these schemes were not included in the assessment, as they were not considered to fall within the definition of “relevant authorities” (see also the explanations above).



## 3 Country assessment reports

**The results of the assessment pertaining to Recommendation B are analysed in this section and presented on an individual basis for each addressee**, following the EU protocol order for countries.

The overall compliance grade attributed to each relevant authority is accompanied by the reasons for the underlying assessment and a table summarising the compliance grades.

A remedial dialogue process was initiated by the Assessment Team, in line with Section 4.1.4. of the Handbook, so as to give the addressees graded as “partially compliant”, “materially non-compliant”, “non-compliant”, or [inaction] “insufficiently explained” in at least one sub-recommendation the opportunity to provide further explanation and information on their actions or inaction. Moreover, the Assessment Team took advantage of the remedial dialogue phase to contact those addressees that had yet to submit a reporting template to the ESRB by the deadlines mentioned earlier (i.e. 31 December 2021 and 4 March 2022). Most of the addressees responded promptly and provided the additional information, which the Assessment Team then took into account when assigning the final grading score. In many cases, the additional information obtained from the addressees resulted in an upgrade.

### 3.1 Assessment results on compliance

#### 3.1.1 Overall grades

As shown in Table 6 below, the majority (67%) of the addressees were assessed as fully compliant with recommendation B. A sizeable minority (31%) were assessed as being largely compliant (LC), while a few (2%) were assessed as being partially compliant (PC). No addressees were assessed as being materially non-compliant (MNC) or non-compliant (NC).



Table 6

## Overall compliance grades for Recommendation B

	Addressees	Overall compliance grade
BE	Nationale Bank van België/Banque Nationale de Belgique	FC
	Autorité des services et marchés financiers	FC
BG	Financial Supervision Commission	LC
	Българска народна банка (Bulgarian National Bank)	FC
	Bulgarian Deposit Insurance Fund	LC
	Financial Intelligence Directorate of the State Agency for National Security (FID-SANS)	FC
CZ	Česká národní banka	LC
	Financial Analytical Office of the Czech Republic	LC
DK	Det Systemiske Risikoråd	FC
	Finanstilsynet	FC
	Finansiel Stabilitet	PC
DE	Bundesanstalt für Finanzdienstleistungsaufsicht	FC
	Deutsche Bundesbank	FC
EE	Eesti Pank	FC
	Finantsinspektsioon	FC
IE	Central Bank of Ireland	FC
	The Pensions Authority	FC
GR	Bank of Greece	FC
	Hellenic Ministry of Finance	FC





	Addressees	Overall compliance grade
	Hellenic Capital Market Commission	LC
	Hellenic Ministry of Labour and Social Affairs	FC
	Autoridad Macropudencial Consejo de Estabilidad Financiera	FC
	Banco de España	FC
ES	Dirección General de Seguros y Fondos de Pensiones – Ministerio de Economía y Competividad	LC
	Autoridad de Resolución Ejecutiva (FROB)	FC
	Comisión Nacional del Mercado de Valores (CNMV)	LC
	Haut Conseil de Stabilité Financière	LC
FR	Autorité de contrôle prudentiel et de résolution (ACPR)	LC
	Banque de France	LC
	Autorité des marchés financiers (AMF)	LC
	Financial Stability Council	FC
HR	Hrvatska narodna banka	FC
	Croatian Financial Services Supervisory Agency	FC
	Fjármálaeftirlitið (FSA)	LC
IS	Central Bank of Iceland	LC
	Commissione Nazionale per le Società e la Borsa (CONSOB)	FC
IT	Banca d'Italia	FC
	Istituto per la vigilanza sulle assicurazioni (IVAAS)	FC
	Commissione di Vigilanza sui Fondi Pensione (COVIP)	LC
CY	Central Bank of Cyprus	FC



	Addressees	Overall compliance grade
	Insurance Companies Control Service	LC
	Cyprus Securities and Exchange Commission	FC
	Supervisory Authority of Institutions for Occupational Retirement Provision (IORPs) of Cyprus	FC
	Finanšu un kapitāla tirgus komisija	FC
LV	Latvijas Banka	FC
	Consumer Rights Protection Centre of Latvia	FC
	Ministry for General Government Affairs and Finance	FC
LI	Finanzmarktaufsicht Liechtenstein	FC
LT	Lietuvos bankas	FC
	Banque Centrale du Luxembourg	LC
LU	Commission de Surveillance du Secteur Financier (CSSF)	LC
	Commissariat aux Assurances	LC
HU	Magyar Nemzeti Bank	FC
	Malta Financial Services Authority (MFSA)	LC
MT	Financial Intelligence Analysis Unit	FC
	Deposit Compensation Scheme	PC
	Bank Ċentrali ta' Malta/Central Bank of Malta	LC
	Autoriteit Financiële Markten	FC
NL	De Nederlandsche Bank	FC
	Finanstilsynet	LC
NO	Norwegian Banks' Guarantee Fund	LC



Addressees		Overall compliance grade
AT	Finanzmarktaufsichtsbehörde	FC
	Oesterreichische Nationalbank	FC
PL	Financial Stability Committee	FC
	Komisja Nadzoru Finansowego	LC
	Bankowy Fundusz Gwarancyjny	FC
	Ministry of Finance	FC
	Narodowy Bank Polski	FC
PT	Banco de Portugal	FC
	Comissão do Mercado de Valores Mobiliários (CMVM)	FC
	Autoridade de Supervisão de Seguros e Fundos de Pensões	FC
RO	Comitetul Național pentru Supravegherea Macroprudențială	FC
	Banca Națională a României	FC
	Autoritatea de Supraveghere Financiară	FC
SI	Financial Stability Board	FC
	Agencija za zavarovalni nadzor (Insurance Supervision Agency)	FC
	Banka Slovenije	LC
	Office for Money Laundering Prevention	FC
SK	Agencija za trg vrednostnih papirjev	FC
	Národná banka Slovenska	FC
FI	Finanssivalvonta	PC
	Rahoitusvakausrasto (Finnish Financial Stability Authority)	FC



Addressees		Overall compliance grade
SE	Ministry of Finance	FC
	Finansinspektionen	FC
ECB/SSM		LC
EBA		FC
EIOPA		LC
ESMA		LC
SRB		FC

FC	Fully compliant
FC	Fully compliant
LC	Largely compliant
PC	Partially compliant
MNC	Materially non-compliant
NC	Non-compliant
SE	[Inaction] sufficiently explained
IE	[Inaction] insufficiently explained

### 3.1.2 Detailed breakdown of compliance with the Recommendation

The overall grades reveal a high degree of compliance with the Recommendation, although there are some variations across sub-recommendations. For sub-recommendation B(1), 56% of addressees to whom the sub-recommendation was applicable were assessed as being FC, 14% were assessed as LC, 2% as PC, 27% as having sufficiently explained their inaction and 1% as



having insufficiently explained their inaction. For sub-recommendation B(2), 53% of the addressees were assessed as being FC, 15% as LC, 8% as PC, 1% as NC and 23% as having sufficiently explained their inaction. For sub-recommendation B(3), 36% of the addressees were assessed as being FC, 19% as LC, 11% as PC, 2% as NC and 31% as having sufficiently explained their inaction.

Table 7

**Breakdown of overall compliance grades for the sub-recommendations by addressee**

Addressee		Sub-recommendation B(1)	Sub-recommendation B(2)	Sub-recommendation B(3)	Reporting	OVERALL ASSESSMENT GRADE
		Requirement to have an LEI	Mandatory identification by way of an LEI included in financial reporting obligations	Identification by way of an LEI in publicly disclosed information	Reporting by 31 December 2021 and use of the template	
BE	Nationale Bank van België/Banque Nationale de Belgique	FC	FC	SE	FC	FC
	Autorité des services et marchés financiers	FC	FC	FC	FC	FC
BG	Financial Supervision Commission	FC	LC	LC	FC	LC
	Българска народна банка (Bulgarian National Bank)	FC	FC	FC	FC	FC
	Bulgarian Deposit Insurance Fund	SE	LC	SE	PC	LC
	Financial Intelligence Directorate of the State Agency for National Security (FID-SANS)	SE	SE	SE	PC	FC
CZ	Česká národní banka	LC	PC	FC	PC	LC
	Financial Analytical Office of the Czech Republic	LC	PC	FC	FC	LC



Addressee	Sub-recommendation B(1)	Sub-recommendation B(2)	Sub-recommendation B(3)	Reporting	OVERALL ASSESSMENT GRADE
	Requirement to have an LEI	Mandatory identification by way of an LEI included in financial reporting obligations	Identification by way of an LEI in publicly disclosed information	Reporting by 31 December 2021 and use of the template	
De Systemiske Risikoråd	SE	SE	SE	PC	FC
	FC	FC	PC	FC	FC
	SE	NC	SE	PC	PC
DE	FC	FC	LC	FC	FC
	FC	FC	LC	FC	FC
EE	SE	SE	SE	FC	FC
	FC	FC	FC	FC	FC
IE	SE	SE	SE	FC	FC
	SE	SE	SE	LC	FC
GR	FC	FC	FC	FC	FC
	SE	SE	SE	PC	FC
	LC	LC	FC	FC	LC
	FC	FC	SE	PC	FC
ES	SE	SE	FC	FC	FC
	FC	FC	FC	FC	FC



Addressee	Sub-recommendation B(1)	Sub-recommendation B(2)	Sub-recommendation B(3)	Reporting	OVERALL ASSESSMENT GRADE	
	Requirement to have an LEI	Mandatory identification by way of an LEI included in financial reporting obligations	Identification by way of an LEI in publicly disclosed information	Reporting by 31 December 2021 and use of the template		
Dirección General de Seguros y Fondos de Pensiones – Ministerio de Economía y Competitividad	FC	FC	PC	FC	LC	
Autoridad de Resolución Ejecutiva (FROB)	SE	FC	FC	LC	FC	
Comisión Nacional del Mercado de Valores (CNMV)	FC	PC	PC	FC	LC	
FR	Haut Conseil de Stabilité Financière	LC	LC	LC	FC	LC
	Autorité de contrôle prudentiel et de résolution (ACPR)	LC	LC	LC	FC	LC
	Banque de France	LC	LC	LC	FC	LC
	Autorité des marchés financiers (AMF)	LC	LC	FC	PC	LC
HR	Financial Stability Council	SE	SE	SE	PC	FC
	Hrvatska narodna banka	SE	SE	SE	FC	FC
	Croatian Financial Services Supervisory Agency	FC	FC	LC	FC	FC
IS	Fjármálaeftirlitið (FSA)	FC	FC	PC	PC	LC
	Central Bank of Iceland	FC	FC	PC	PC	LC



Addressee		Sub-recommendation B(1)	Sub-recommendation B(2)	Sub-recommendation B(3)	Reporting	OVERALL ASSESSMENT GRADE
		Requirement to have an LEI	Mandatory identification by way of an LEI included in financial reporting obligations	Identification by way of an LEI in publicly disclosed information	Reporting by 31 December 2021 and use of the template	
IT	Commissione Nazionale per le Società e la Borsa (CONSOB)	SE	SE	SE	FC	FC
	Banca d'Italia	FC	FC	SE	FC	FC
	Istituto per la vigilanza sulle assicurazioni (IVAAS)	FC	FC	SE	FC	FC
	Commissione di Vigilanza sui Fondi Pensione (COVIP)	PC	PC	SE	LC	LC
CY	Central Bank of Cyprus	LC	LC	FC	FC	FC
	Insurance Companies Control Service	FC	FC	NC	FC	LC
	Cyprus Securities and Exchange Commission	FC	FC	FC	LC	FC
	Cyprus Deposit Guarantee Scheme	LC	LC	FC	FC	LC
	Supervisory Authority of Institutions for Occupational Retirement Provision (IORPs)	FC	SE	FC	FC	FC





Addressee		Sub-recommendation B(1)	Sub-recommendation B(2)	Sub-recommendation B(3)	Reporting	OVERALL ASSESSMENT GRADE
		Requirement to have an LEI	Mandatory identification by way of an LEI included in financial reporting obligations	Identification by way of an LEI in publicly disclosed information	Reporting by 31 December 2021 and use of the template	
LV	Finanšu un kapitāla tirgus komisija	FC	FC	FC	FC	FC
	Latvijas Banka	FC	FC	FC	FC	FC
	Consumer Rights Protection Centre of Latvia	FC	FC	LC	FC	FC
LI	Ministry for General Government Affairs and Finance	FC	FC	FC	FC	FC
	Finanzmarktaufsicht Liechtenstein	FC	FC	FC	FC	FC
LT	Lietuvos bankas	SE	SE	SE	FC	FC
LU	Banque Centrale du Luxembourg	IE	FC	SE	FC	LC
	Commission de Surveillance du Secteur Financier (CSSF)	LC	FC	LC	FC	LC
	Commissariat aux Assurances	FC	PC	PC	FC	LC
HU	Magyar Nemzeti Bank	FC	FC	FC	FC	FC



Addressee		Sub-recommendation B(1)	Sub-recommendation B(2)	Sub-recommendation B(3)	Reporting	OVERALL ASSESSMENT GRADE
		Requirement to have an LEI	Mandatory identification by way of an LEI included in financial reporting obligations	Identification by way of an LEI in publicly disclosed information	Reporting by 31 December 2021 and use of the template	
MT	Malta Financial Services Authority (MFSA)	FC	FC	PC	FC	LC
	Financial Intelligence Analysis Unit	SE	SE	SE	PC	FC
	Deposit Compensation Scheme	PC	PC	PC	PC	PC
	Bank Ċentrali ta' Malta/Central Bank of Malta	FC	FC	PC	FC	LC
NL	Autoriteit Financiële Markten	FC	FC	FC	FC	FC
	De Nederlandsche Bank	FC	FC	FC	FC	FC
NO	Finanstilsynet	FC	LC	LC	FC	LC
	Norwegian Banks' Guarantee Fund	LC	LC	LC	PC	LC
AT	Finanzmarktaufsichtsbehörde	FC	FC	FC	FC	FC
	Oesterreichische Nationalbank	FC	FC	FC	FC	FC
PL	Financial Stability Committee	SE	SE	SE	FC	FC
	Polish Financial Supervision Authority	LC	LC	PC	FC	LC
	Bankowy Fundusz Gwarancyjny	SE	LC	SE	FC	FC
	Ministry of Finance	SE	SE	SE	FC	FC
	Narodowy Bank Polski	SE	FC	SE	FC	FC



Addressee		Sub-recommendation B(1)	Sub-recommendation B(2)	Sub-recommendation B(3)	Reporting	OVERALL ASSESSMENT GRADE
		Requirement to have an LEI	Mandatory identification by way of an LEI included in financial reporting obligations	Identification by way of an LEI in publicly disclosed information	Reporting by 31 December 2021 and use of the template	
PT	Banco de Portugal	FC	FC	FC	FC	FC
	Comissão do Mercado de Valores Mobiliários (CMVM)	FC	FC	FC	LC	FC
	Autoridade de Supervisão de Seguros e Fundos de Pensões	FC	FC	LC	FC	FC
RO	Comitetul Național pentru Supravegherea Macroprudențială	FC	FC	FC	FC	FC
	Banca Națională a României	FC	FC	FC	FC	FC
	Autoritatea de Supraveghere Financiară	FC	LC	FC	FC	FC
SI	Financial Stability Board	SE	SE	SE	PC	FC
	Agencija za trg vrednostnih papirjev	FC	FC	LC	FC	FC
	Banka Slovenije	FC	FC	NC	FC	LC
	Office for Money Laundering Prevention	SE	SE	SE	PC	FC
	Agencija za zavarovalni nadzor	FC	FC	LC	FC	FC
SK	Národná banka Slovenska	FC	FC	FC	FC	FC



Addressee		Sub-recommendation B(1)	Sub-recommendation B(2)	Sub-recommendation B(3)	Reporting	OVERALL ASSESSMENT GRADE
		Requirement to have an LEI	Mandatory identification by way of an LEI included in financial reporting obligations	Identification by way of an LEI in publicly disclosed information	Reporting by 31 December 2021 and use of the template	
FI	Finanssivalvonta	SE	SE	SE	PC	FC
	Rahoitusvakausvirasto (Finnish Financial Stability Authority)	FC	FC	SE	PC	FC
SE	Ministry of Finance	SE	SE	SE	PC	FC
	Finansinspektionen	FC	FC	LC	FC	FC
ECB/SSM		N/A	LC	FC	LC	LC
EBA		N/A	FC	FC	LC	FC
EIOPA		N/A	LC	LC	FC	LC
ESMA		N/A	LC	LC	MNC	LC
SRB		N/A	SE	FC	PC	FC



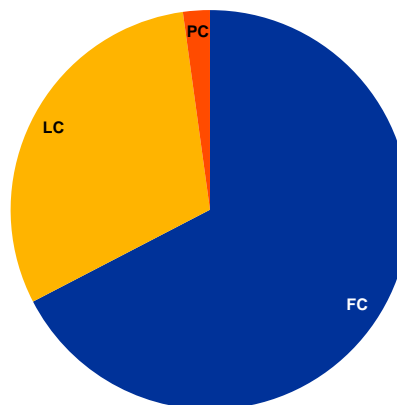
## 4 Overall results

**In general, the degree of compliance with Recommendation B is high.** A total of 85 authorities from 30 EEA countries<sup>17</sup> were assessed, as was the ECB, as a competent authority within the Single Supervisory Mechanism (SSM), the EBA, EIOPA, the SRB and ESMA.

Considering the overall level of compliance for Recommendation B, a total of 60 authorities were graded as “fully compliant” out of the 90 authorities assessed (67%). Meanwhile, 28 authorities received the grade of “largely compliant”, representing 31% of the total number of addressees assessed, and 2 authorities were assessed as “partially compliant”, representing approximately 2% of the total number of addressees (Chart 1).

Chart 1

### Distribution of the overall compliance grade for Recommendation B



Source: Assessor's own calculations.

Looking at the sub-recommendation level, for sub-recommendation B(1), 47 addressees were graded as “fully compliant”, representing 56% of addressees to whom the sub-recommendation was applicable; 12 authorities were graded as “largely compliant”, representing 14% of addressees to whom the sub-recommendation was applicable; two authorities were graded as “partially compliant”, representing 2% of addressees to whom the sub-recommendation was applicable; 23 addressees were graded as [inaction] “sufficiently explained”, representing 27% of addressees to whom the sub-recommendation was applicable; and one addressees was graded as [inaction] “insufficiently explained”, representing 1% of addressees to whom the sub-recommendation was applicable (see Chart 2 below).

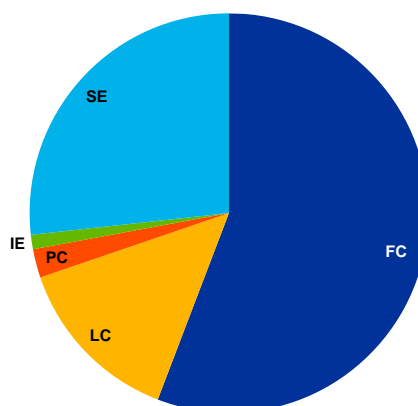
<sup>17</sup> The 27 Member States of the EU plus Liechtenstein, Iceland and Norway.



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Chart 2

**Distribution of the overall compliance grade for sub-recommendation B(1)**



*Source: Assessor's own calculations.*

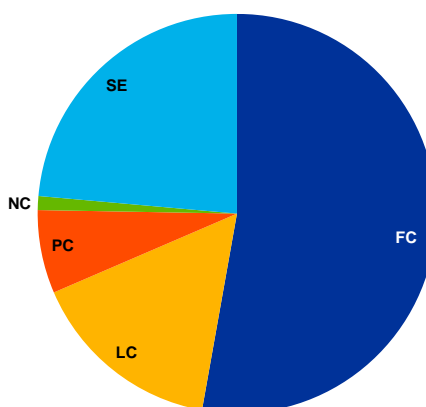
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For sub-recommendation B(2), 48 addressees were graded as “fully compliant”, representing 53% of addressees to whom the sub-recommendation was applicable; 14 addressees were graded as “largely compliant”, representing 15% of addressees; six addressees were graded as “partially compliant”, representing 8% of addressees to whom the sub-recommendation was applicable; one authority was graded as “non-compliant”, representing 1% of addressees to whom the sub-recommendation was applicable; and 21 authorities were graded as [inaction] “sufficiently explained”, representing 23% of addressees to whom the sub-recommendation was applicable (see Chart 3 below).

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Chart 3

**Distribution of the overall compliance grade for sub-recommendation B(2)**



*Source: Assessor's own calculations.*

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For sub-recommendation B(3), 32 addressees were graded as “fully compliant”, representing 36% of addressees; 18 authorities were graded as “largely compliant”, representing 19% of addressees to whom the sub-recommendation was applicable; 10 addressees were graded as “partially

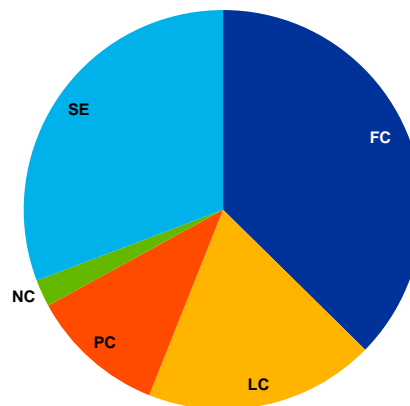


compliant”, representing 11% of addressees to whom the sub-recommendation was applicable; two authorities were graded as “non-compliant”, representing 2% of addressees to whom the sub-recommendation was applicable; and 28 authorities were graded as [inaction] “sufficiently explained”, representing 31% of addressees to whom the sub-recommendation was applicable (see Chart 4 below).

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Chart 4

**Distribution of the overall compliance grade for sub-recommendation B(3)**



*Source: Assessor's own calculations.*

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The sub-recommendation showing the highest percentage of full compliance is B(1), while the sub-recommendation showing the lowest rate of full compliance is B(3). The sub-recommendation showing the highest level of non-compliance is B(3), while the sub-recommendation showing no non-compliance at all is B(1).



## 5 Conclusions

The Assessment Team assessed the level of compliance with Recommendation B of Recommendation ESRB/2020/12 on identifying legal entities among 85 authorities from 30 EEA countries and five European bodies. Pending on any action taken by the Commission and the possible introduction of Union legislation, in Recommendation B it is recommended that:

The relevant authorities require all legal entities involved in financial transactions under the supervisory remit to have an LEI,

the authorities include, when drafting, imposing or amending financial reporting obligations, the obligation to identify by way of an LEI and

the authorities identify, by way of its LEI, any legal entity about which they publicly disclose information and which has an LEI.

To summarise the assessor's evaluation, 67% of authorities were graded as "fully compliant" for the Recommendation as a whole, 31% of authorities were graded as "largely compliant" and 2% of authorities received the grade of "partially compliant".

Despite the broadly positive outcome of this assessment for the authorities taking part, the Assessment Team notes that current coverage of the LEI should be further improved in line with the policy objectives stated by the ESRB in the Recommendation, particularly for non-financial entities. The Assessment Team also notes that several authorities cite a lack of legal authority and the costs involved (principle of proportionality) as the main obstacles to achieving the higher level of LEI coverage they would like to see. In line with the Recommendation, in its response the ECB suggests that the Regulatory Oversight Committee, which coordinates and oversees the Global LEI System, should be encouraged to revisit the business model for the LEI and to explore the feasibility of making the business registries the official sources of legal identity, as doing so could lead to universal LEI coverage and real-time accuracy at near-zero cost. In its response, the ECB also remarks that full LEI coverage with real-time accuracy would improve the performance of regulatory institutions in the areas of financial stability, banking supervision and AML, sustainably as technology continues to advance, and it would achieve further progress towards goals linked to climate sustainability. Last but not least, it would provide an infrastructure for improved competitiveness of European businesses and for digital innovation in the EU.

Further, legislators, standard setters and stakeholders should be encouraged to continue their support in promoting the use of the LEI. This might involve including reference to the LEI in company reports (while respecting the principle of proportionality). The approach of using the LEI for identification purposes in the European Single Electronic Format (ESEF)<sup>18</sup> should be continued for future Sustainability Reports in accordance with the Corporate Sustainability Reporting Directive (CSRD), when this new Directive becomes mandatory for large corporations. This would increase transparency and therefore improve the assessment of financial risks with regard to climate

<sup>18</sup> Using ISO 17442 legal entity identifiers; see Annex IV, section 2 of the ESEF Regulation: [EUR-Lex - 32019R0815 - EN - EUR-Lex \(europa.eu\)](#).





change. Moreover, the use of LEI level 2 data among companies could be encouraged to better identify direct and ultimate parents of a legal entity.

Meanwhile, designated authorities are encouraged to take further steps to improve their general compliance with the Recommendation by seeing to it that they identify, by way of its LEI, any legal entity about which they publicly disclose information, while also including the obligation to identify by way of an LEI when drafting, imposing or amending financial reporting obligations.

Regarding sub-recommendation B(1), it should be noted that some addressees received the grade of “largely compliant”, as not all legal entities involved in financial transactions under their supervisory remit have an LEI.

Regarding sub-recommendation B(2), it should be noted that a significant number of the addressees received the grade of [inaction] “sufficiently explained” as during the period for implementing the recommendation they did not have authority to impose the obligation to use LEI codes, but could only encourage reporting entities to do so. Other addressees (e.g. macroprudential authorities) could only issue recommendations on a “comply or explain” basis.

Regarding sub-recommendation B(3), it should be noted that some addressees do not publish data relating to individual institutions on their website, but only data at the aggregate level. They were therefore graded as [inaction] “sufficiently explained” for this sub-recommendation.

In view of the assessment results, the authorities should take further steps to implement Recommendation B of Recommendation ESRB/2020/12 on identifying legal entities.



## 6 Annexes

### 6.1 Annex I: Composition of the Assessment Team

(Approved by the Advisory Technical Committee of the ESRB via Written Procedure ATC/WP/2022/036)

<b>Francis Gross, Chairperson</b>	<b>European Central Bank</b>
<b>Lucija Bušurelo</b>	Hrvatska narodna Banka
<b>Mattia Duma</b>	EIOPA
<b>Dominik Elgg</b>	Deutsche Bundesbank
<b>Robert-Adrian Grecu</b>	Banca Națională a României
<b>Fabien Renouard</b>	Banque de France
<b>Carlotta Donetti</b>	ESRB Secretariat
<b>Jari Friebel</b>	ESRB Secretariat
<b>Kiki Kuijs</b>	ESRB Secretariat
<b>Amanda Trinh</b>	ESRB Secretariat
<b>Jessica Ray</b>	ESRB Secretariat



## 6.2 Annex II: Implementation Standards for Recommendation B of Recommendation ESRB/2020/12

### Sub-recommendation B(1)

		Required use of an LEI for authorities under supervisory remit
Positive grades	<b>Fully compliant (FC)</b> – Actions taken fully implement the Recommendation	<ul style="list-style-type: none"> <li>• Addressee has required or, where applicable, has continued to require all legal entities involved in financial transactions under its supervisory remit to have an LEI.</li> <li>• The actions taken by the addressee were successful in ensuring that all legal entities involved in financial transactions and under its supervisory remit have an LEI.</li> </ul>
	<b>Largely compliant (LC)</b> – Actions taken implement almost all of the Recommendation	<ul style="list-style-type: none"> <li>• Addressee has required or, where applicable, has continued to require the use of an LEI among legal entities under its supervisory remit.</li> <li>• Reporting and information submitted by the addressee suggest that further efforts from the addressee are needed to ensure that all legal entities involved in financial transactions under its supervisory remit have an LEI. However, the actions taken do largely reflect the nature of the sub-recommendation.</li> </ul>
	<b>Sufficiently explained (SE)</b> – No actions were taken but the addressee provided sufficient justification	<ul style="list-style-type: none"> <li>• Addressee has not required, or continued to require, the use of an LEI among legal entities involved in financial transactions and under its supervisory remit. Reporting and information submitted by the addressee clearly indicate that such requirements on the use of LEIs among legal entities under its supervisory remit would be disproportionate at this point in time.</li> </ul>
Mid-grade	<b>Partially compliant (PC)</b> – Actions taken implement only part of the Recommendation	<ul style="list-style-type: none"> <li>• Addressee has required, or continued to require, the use of an LEI among legal entities involved in financial transactions and under its supervisory remit. However, reporting and information submitted by the addressee indicate that further efforts are needed to achieve the objectives of the sub-recommendation.</li> </ul>
	<b>Materially Non-compliant (MNC)</b> – Actions taken implement only a small part of the Recommendation	<ul style="list-style-type: none"> <li>• Addressee has required, or continued to require, the use of an LEI among legal entities under its supervisory remit. However, reporting and information submitted by the addressee indicate that the action taken by the addressee is not at all in line, or is only partly in line, with the content of the sub-recommendation.</li> </ul>



Required use of an LEI for authorities under supervisory remit	
<b>Negative grades</b>	<p><b>Non-compliant (NC)</b> – Actions taken are not in line with the nature of the Recommendation</p> <ul style="list-style-type: none"> <li>• Addressee has not required the use of an LEI among legal entities involved in financial transactions and under its supervisory remit.</li> <li>• Where applicable, addressee has ceased to require the use of an LEI among legal entities involved in financial transactions and under its supervisory remit.</li> <li>• Addressee has not submitted any reporting, or the reporting submitted is not in line with the nature of the sub-recommendation.</li> </ul> <p><b>[Inaction] Insufficiently explained (IE)</b> – No action was taken and the addressee failed to provide sufficient justification</p> <ul style="list-style-type: none"> <li>• Addressee has not required, and nor does it continue to require, the use of an LEI among legal entities under its supervisory remit. The addressee failed to provide any further justification for its inaction.</li> </ul>

#### Sub-recommendation B(2)

Mandatory identification by way of an LEI to be included in financial reporting obligations	
<b>Positive grades</b>	<p><b>Fully compliant (FC)</b> – Actions taken fully implement the Recommendation</p> <ul style="list-style-type: none"> <li>• Addressee has included or continued to include, in financial reporting obligations (when drafting, imposing or amending them), an obligation to identify, by way of an LEI: <ul style="list-style-type: none"> <li>(a) the legal entity subject to the reporting obligation; and</li> <li>(b) any other legal entity about which information must be reported and which has an LEI.</li> </ul> </li> </ul>
	<p><b>Largely compliant (LC)</b> – Actions taken implement almost all of the Recommendation</p> <ul style="list-style-type: none"> <li>• Addressee has included or continued to include, in most financial reporting obligations (when drafting, imposing, or amending them), an obligation to identify by way of an LEI: <ul style="list-style-type: none"> <li>(a) the legal entity subject to the reporting obligation; and</li> <li>(b) any other legal entity about which information must be reported and which has an LEI.</li> </ul> </li> <li>• Reporting and information submitted by the addressee suggest that further efforts from the addressee are needed. However actions taken do largely correspond with the nature of the sub-recommendation.</li> </ul>
	<p><b>Sufficiently explained (SE)</b> – No actions were taken but the addressee provided sufficient justification</p> <ul style="list-style-type: none"> <li>• Addressee has not included or continued to include, in financial reporting obligations (when drafting, imposing, or amending them), an obligation to identify by way of an LEI: <ul style="list-style-type: none"> <li>(a) the legal entity subject to the reporting obligation; and</li> <li>(b) any other legal entity about which information must be reported and which has an LEI.</li> </ul> </li> <li>• Reporting and information submitted by the addressee clearly indicate that such requirements for the inclusion of an LEI in financial reporting obligations would be disproportionate at this point in time.</li> </ul>



**Mandatory identification by way of an LEI to be included in financial reporting obligations**

<b>Mid-grade</b>	<p><b>Partially compliant (PC)</b> – Actions taken implement only part of the Recommendation</p>	<ul style="list-style-type: none"> <li>• Addressee has included or continued to include, in some financial reporting obligations (when drafting, imposing, or amending them), an obligation to identify by way of an LEI:                             <ul style="list-style-type: none"> <li>(a) the legal entity subject to the reporting obligation; and</li> <li>(b) any other legal entity about which information must be reported and which has an LEI.</li> </ul> </li> <li>• Reporting and information submitted by the addressee indicate that further efforts are needed to achieve the objectives of the sub-recommendation.</li> </ul>
	<p><b>Materially Non-compliant (MNC)</b> – Actions taken implement only a small part of the Recommendation</p>	<ul style="list-style-type: none"> <li>• Addressee has included or continued to include, in few financial reporting obligations (when drafting, imposing, or amending them), an obligation to identify by way of an LEI:                             <ul style="list-style-type: none"> <li>(a) the legal entity subject to the reporting obligation; and</li> <li>(b) any other legal entity about which information must be reported and which has an LEI.</li> </ul> </li> <li>• Reporting and information submitted by the addressee indicate that further efforts are needed to achieve the objectives of the Recommendation.</li> <li>• Reporting and information submitted by the addressee indicate that measures taken are not at all in line, or are only partly in line, with the content of the sub-recommendation.</li> </ul>
<b>Negative grades</b>	<p><b>Non-compliant (NC)</b> – Actions taken are not in line with the nature of the Recommendation</p>	<ul style="list-style-type: none"> <li>• Addressee has not included nor continued to include, in financial reporting obligations (when drafting, imposing, or amending them), an obligation to identify by way of an LEI:                             <ul style="list-style-type: none"> <li>(a) the legal entity subject to the reporting obligation; and</li> <li>(b) any other legal entity about which information must be reported and which has an LEI.</li> </ul> </li> <li>• Addressee has not submitted any reporting or the reporting and information submitted are not in line with the nature of the sub-recommendation.</li> </ul>
	<p><b>[Inaction] Insufficiently explained (IE)</b> – No action was taken and the addressee failed to provide sufficient justification</p>	<ul style="list-style-type: none"> <li>• Addressee has not included nor continued to include, in financial reporting obligations (when drafting, imposing, or amending them), an obligation to identify by way of an LEI:                             <ul style="list-style-type: none"> <li>(a) the legal entity subject to the reporting obligation; and</li> <li>(b) any other legal entity about which information must be reported and which has an LEI. The addressee has not provided any further justification for its inaction.</li> </ul> </li> </ul>



### Sub-recommendation B(3)

	Identification by way of an LEI in publicly disclosed information	
Positive grades	<p><b>Fully compliant (FC)</b> – Actions taken fully implement the Recommendation</p>	<ul style="list-style-type: none"> <li>• Addressee has identified or continued to identify, by way of an LEI, legal entities whose information is publicly disclosed by the addressee.</li> </ul>
	<p><b>Largely compliant (LC)</b> – Actions taken implement almost all of the Recommendation</p>	<ul style="list-style-type: none"> <li>• Addressee has broadly/mostly identified or continued to identify, by way of an LEI, legal entities whose information is publicly disclosed by the addressee.</li> <li>• Reporting and information submitted by the addressee suggest that further efforts from the addressee are needed. However, the actions taken are largely consistent with the nature of the sub-recommendation.</li> </ul>
	<p><b>Sufficiently explained (SE)</b> – No actions were taken but the addressee provided sufficient justification</p>	<ul style="list-style-type: none"> <li>• Addressee has not identified or continued to identify, by way of an LEI, legal entities whose information is publicly disclosed by the addressee.</li> <li>• Reporting and information submitted by the addressee clearly indicate that any such use of an LEI would be disproportionate at this point in time.</li> </ul>
Mid-grade	<p><b>Partially compliant (PC)</b> – Actions taken implement only part of the Recommendation</p>	<ul style="list-style-type: none"> <li>• Addressee has inconsistently identified or continued to identify, by way of an LEI, legal entities whose information is publicly disclosed by the addressee.</li> <li>• Reporting and information submitted by the addressee indicate that further efforts are needed to achieve the objectives of the sub-recommendation.</li> </ul>
	<p><b>Materially Non-compliant (MNC)</b> – Actions taken implement only a small part of the Recommendation</p>	<ul style="list-style-type: none"> <li>• Addressee has not identified nor continued to identify, by way of an LEI, legal entities whose information is publicly disclosed by the addressee.</li> <li>• Reporting and information submitted by the addressee indicate that the measures taken are not at all in line, or only partly in line, with the content of the sub-recommendation.</li> </ul>
Negative grades	<p><b>Non-compliant (NC)</b> – Actions taken are not in line with the nature of the Recommendation</p>	<ul style="list-style-type: none"> <li>• Addressee has not identified nor continued to identify, by way of an LEI, legal entities whose information is publicly disclosed by the addressee.</li> <li>• The addressee has not submitted any reporting or the reporting and information submitted are not in line with the nature of the sub-recommendation.</li> </ul>
	<p><b>[Inaction] Insufficiently explained (IE)</b> – No action was taken and the addressee failed to provide sufficient justification</p>	<ul style="list-style-type: none"> <li>• Addressee has not identified nor continued to identify, by way of an LEI, legal entities whose information is publicly disclosed by the addressee.</li> <li>• The addressee has not provided any further justification for its inaction.</li> </ul>



## Reporting

		Reporting by 31 December 2021 and use of the template
Positive grades	<b>Fully compliant (FC)</b> – Actions taken fully implement the Recommendation	<ul style="list-style-type: none"> <li>• Addressee submitted fully completed templates to the ESRB Secretariat by 31 December 2021.</li> <li>• Addressee reported to the ESRB by making use of the published reporting templates under Recommendation B.</li> </ul>
	<b>Largely compliant (LC)</b> – Actions taken implement almost all of the Recommendation	<ul style="list-style-type: none"> <li>• Addressee submitted completed templates to the ESRB Secretariat by 4 March 2022.</li> <li>• Addressee reported to the ESRB by making use of the published reporting templates under Recommendation B.</li> <li>• Addressee submitted templates as under “FC”, with only minor information missing.</li> </ul>
	<b>Sufficiently explained (SE)</b> – No actions were taken but the addressee provided sufficient justification	<ul style="list-style-type: none"> <li>• Addressee submitted its fully completed templates later than 31 December 2021 but provided a sufficient explanation for the delay.</li> </ul>
Mid-grade	<b>Partially compliant (PC)</b> – Actions taken implement only part of the Recommendation	<ul style="list-style-type: none"> <li>• Addressee submitted its templates to the ESRB Secretariat later than 4 March 2022.</li> <li>• Addressee submitted templates to the ESRB Secretariat before 4 March 2022, though certain essential information was missing.</li> </ul>
	<b>Materially Non-compliant (MNC)</b> – Actions taken implement only a small part of the Recommendation	<ul style="list-style-type: none"> <li>• Addressee submitted its templates to the ESRB Secretariat later than 4 March 2022 AND</li> <li>• Addressee’s submission did not follow the standard templates provided by the ESRB Secretariat.</li> </ul>
Negative grades	<b>Non-compliant (NC)</b> – Actions taken are not in line with the nature of the Recommendation	<ul style="list-style-type: none"> <li>• Addressee did not submit the templates and failed to provide any justification its inaction.</li> </ul>
	<b>[Inaction] Insufficiently explained (IE)</b> – No action was taken and the addressee failed to provide sufficient justification	<ul style="list-style-type: none"> <li>• Addressee did not submit templates and provided inadequate justification for its inaction.</li> </ul>



## 6.3 Annex III: Overall table of results

Addressee		Sub-recommendation B(1)  Requirement to have an LEI	Sub-recommendation B(2)  Mandatory identification by way of an LEI included in financial reporting obligations	Sub-recommendation B(3)  Identification by way of an LEI in publicly disclosed information	Reporting  Reporting by 31 December 2021 and use of the template	OVERALL ASSESSMENT GRADE
BE	Nationale Bank van België/Banque Nationale de Belgique	FC	FC	SE	FC	FC
	Autorité des services et marchés financiers	FC	FC	FC	FC	FC
BG	Financial Supervision Commission	FC	LC	LC	FC	LC
	Българска народна банка (Bulgarian National Bank)	FC	FC	FC	FC	FC
	Bulgarian Deposit Insurance Fund	SE	LC	SE	PC	LC
	Financial Intelligence Directorate of the State Agency for National Security (FID-SANS)	SE	SE	SE	PC	FC
CZ	Česká národní banka	LC	PC	FC	PC	LC
	Financial Analytical Office of the Czech Republic	LC	PC	FC	FC	LC
DK	Det Systemiske Risikoråd	SE	SE	SE	PC	FC
	Finanstilsynet	FC	FC	PC	FC	FC
	Finansiel Stabilitet	SE	NC	SE	PC	PC





Addressee		Sub-recommendation B(1)  Requirement to have an LEI	Sub-recommendation B(2)  Mandatory identification by way of an LEI included in financial reporting obligations	Sub-recommendation B(3)  Identification by way of an LEI in publicly disclosed information	Reporting  Reporting by 31 December 2021 and use of the template	OVERALL ASSESSMENT GRADE
DE	Bundesanstalt für Finanzdienstleistungsaufsicht	FC	FC	LC	FC	FC
	Deutsche Bundesbank					
EE	Eesti Pank	SE	SE	SE	FC	FC
	Finantsinspektsioon	FC	FC	FC	FC	FC
IE	Central Bank of Ireland	SE	SE	SE	FC	FC
	The Pensions Authority	SE	SE	SE	LC	FC
GR	Bank of Greece	FC	FC	FC	FC	FC
	Hellenic Ministry of Finance	SE	SE	SE	PC	FC
	Hellenic Capital Market Commission	LC	LC	FC	FC	LC
	Hellenic Ministry of Labour and Social Affairs	FC	FC	SE	PC	FC



Addressee		Sub-recommendation B(1)  Requirement to have an LEI	Sub-recommendation B(2)  Mandatory identification by way of an LEI included in financial reporting obligations	Sub-recommendation B(3)  Identification by way of an LEI in publicly disclosed information	Reporting  Reporting by 31 December 2021 and use of the template	OVERALL ASSESSMENT GRADE
ES	Autoridad Macropudencial Consejo de Estabilidad Financiera	SE	SE	FC	FC	FC
	Banco de España	FC	FC	FC	FC	FC
	Dirección General de Seguros y Fondos de Pensiones – Ministerio de Economía y Competividad	FC	FC	PC	FC	LC
	Autoridad de Resolución Ejecutiva (FROB)	SE	FC	FC	LC	FC
	Comisión Nacional del Mercado de Valores (CNMV)	FC	PC	PC	FC	LC
FR	Haut Conseil de Stabilité Financière	LC	LC	LC	FC	LC
	Autorité de contrôle prudentiel et de résolution (ACPR)	LC	LC	LC	FC	LC
	Banque de France	LC	LC	LC	FC	LC
	Autorité des marchés financiers (AMF)	LC	LC	FC	PC	LC



Addressee		Sub-recommendation B(1)  Requirement to have an LEI	Sub-recommendation B(2)  Mandatory identification by way of an LEI included in financial reporting obligations	Sub-recommendation B(3)  Identification by way of an LEI in publicly disclosed information	Reporting  Reporting by 31 December 2021 and use of the template	OVERALL ASSESSMENT GRADE
HR	Financial Stability Council	SE	SE	SE	PC	FC
	Hrvatska narodna banka	SE	SE	SE	FC	FC
	Croatian Financial Services Supervisory Agency	FC	FC	LC	FC	FC
IS	Fjármálaeftirlitið (FSA)	FC	FC	PC	PC	LC
	Central Bank of Iceland	FC	FC	PC	PC	LC
IT	Commissione Nazionale per le Società e la Borsa (CONSOB)	SE	SE	SE	FC	FC
	Banca d'Italia	FC	FC	SE	FC	FC
	Istituto per la vigilanza sulle assicurazioni (IVAAS)	FC	FC	SE	FC	FC
	Commissione di Vigilanza sui Fondi Pensione (COVIP)	PC	PC	SE	LC	LC



Addressee		Sub-recommendation B(1)  Requirement to have an LEI	Sub-recommendation B(2)  Mandatory identification by way of an LEI included in financial reporting obligations	Sub-recommendation B(3)  Identification by way of an LEI in publicly disclosed information	Reporting  Reporting by 31 December 2021 and use of the template	OVERALL ASSESSMENT GRADE
CY	Central Bank of Cyprus	LC	LC	FC	FC	FC
	Insurance Companies Control Service	FC	FC	NC	FC	LC
	Cyprus Securities and Exchange Commission	FC	FC	FC	LC	FC
	Cyprus Deposit Guarantee Scheme	LC	LC	FC	FC	LC
	Supervisory Authority of Institutions for Occupational Retirement Provision (IORPs)	FC	SE	FC	FC	FC
LV	Finanšu un kapitāla tirgus komisija	FC	FC	FC	FC	FC
	Latvijas Banka	FC	FC	FC	FC	FC
	Consumer Rights Protection Centre of Latvia	FC	FC	LC	FC	FC
LI	Ministry for General Government Affairs and Finance	FC	FC	FC	FC	FC
	Finanzmarktaufsicht Liechtenstein	FC	FC	FC	FC	FC
LT	Lietuvos bankas	SE	SE	SE	FC	FC



Addressee		Sub-recommendation B(1) Requirement to have an LEI	Sub-recommendation B(2) Mandatory identification by way of an LEI included in financial reporting obligations	Sub-recommendation B(3) Identification by way of an LEI in publicly disclosed information	Reporting Reporting by 31 December 2021 and use of the template	OVERALL ASSESSMENT GRADE
LU	Banque Centrale du Luxembourg	IE	FC	SE	FC	LC
	Commission de Surveillance du Secteur Financier (CSSF)	LC	FC	LC	FC	LC
	Commissariat aux Assurances	FC	PC	PC	FC	LC
HU	Magyar Nemzeti Bank	FC	FC	FC	FC	FC
MT	Malta Financial Services Authority (MFSA)	FC	FC	PC	FC	LC
	Financial Intelligence Analysis Unit	SE	SE	SE	PC	FC
	Deposit Compensation Scheme	PC	PC	PC	PC	PC
	Bank Ċentrali ta' Malta/Central Bank of Malta	FC	FC	PC	FC	LC
NL	Autoriteit Financiële Markten	FC	FC	FC	FC	FC
	De Nederlandsche Bank	FC	FC	FC	FC	FC
NO	Finanstilsynet	FC	LC	LC	FC	LC
	Norwegian Banks' Guarantee Fund	LC	LC	LC	PC	LC



Addressee		Sub-recommendation B(1)  Requirement to have an LEI	Sub-recommendation B(2)  Mandatory identification by way of an LEI included in financial reporting obligations	Sub-recommendation B(3)  Identification by way of an LEI in publicly disclosed information	Reporting  Reporting by 31 December 2021 and use of the template	OVERALL ASSESSMENT GRADE
AT	Finanzmarktaufsichtsb ehörde	FC	FC	FC	FC	FC
	Oesterreichische Nationalbank	FC	FC	FC	FC	FC
PL	Financial Stability Committee	SE	SE	SE	FC	FC
	Polish Financial Supervision Authority	LC	LC	PC	FC	LC
	Bankowy Fundusz Gwarancyjny	SE	LC	SE	FC	FC
	Ministry of Finance	SE	SE	SE	FC	FC
	Narodowy Bank Polski	SE	FC	SE	FC	FC
PT	Banco de Portugal	FC	FC	FC	FC	FC
	Comissão do Mercado de Valores Mobiliários (CMVM)	FC	FC	FC	LC	FC
	Autoridade de Supervisão de Seguros e Fundos de Pensões	FC	FC	LC	FC	FC



Addressee		Sub-recommendation B(1)  Requirement to have an LEI	Sub-recommendation B(2)  Mandatory identification by way of an LEI included in financial reporting obligations	Sub-recommendation B(3)  Identification by way of an LEI in publicly disclosed information	Reporting  Reporting by 31 December 2021 and use of the template	OVERALL ASSESSMENT GRADE
RO	Comitetul Național pentru Supravegherea Macroprudențială	FC	FC	FC	FC	FC
	Banca Națională a României	FC	FC	FC	FC	FC
	Autoritatea de Supraveghere Financiară	FC	LC	FC	FC	FC
SI	Financial Stability Board	SE	SE	SE	PC	FC
	Agencija za trg vrednostnih papirjev	FC	FC	LC	FC	FC
	Banka Slovenije	FC	FC	NC	FC	LC
	Office for Money Laundering Prevention	SE	SE	SE	PC	FC
	Agencija za zavarovalni nadzor	FC	FC	LC	FC	FC
SK	Národná banka Slovenska	FC	FC	FC	FC	FC
FI	Finanssivalvonta	SE	SE	SE	PC	FC
	Rahoitusvakuusvirasto (Finnish Financial Stability Authority)	FC	FC	SE	PC	FC
SE	Ministry of Finance	SE	SE	SE	PC	FC
	Finansinspektionen	FC	FC	LC	FC	FC



Addressee	Sub-recommendation B(1)  Requirement to have an LEI	Sub-recommendation B(2)  Mandatory identification by way of an LEI included in financial reporting obligations	Sub-recommendation B(3)  Identification by way of an LEI in publicly disclosed information	Reporting  Reporting by 31 December 2021 and use of the template	OVERALL ASSESSMENT GRADE
ECB/SSM	N/A	LC	FC	LC	LC
EBA	N/A	FC	FC	LC	FC
EIOPA	N/A	LC	LC	FC	LC
ESMA	N/A	LC	LC	MNC	LC
SRB	N/A	SE	FC	PC	FC





# Imprints and acknowledgements

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