

GUIDELINES COMPLIANCE TABLE

Joint Guidelines On the estimation of aggregated annual costs and losses caused by major ICT-related incidents under Regulation (EU) 2022/2554 (JC/GL/2024/34)

The following competent authorities comply or intend to comply with Joint Guidelines On the estimation of aggregated annual costs and losses caused by major ICT-related incidents under Regulation (EU) 2022/2554 (JC/GL/2024/34).

			Complies or intends to comply	Comments
Member States				
AT	Austria	Financial Market Authority (FMA)	Yes	ESMA Guidelines and other Convergence Instruments - FMA Österreich ESMA-Leitlinien und andere Konvergenzinstrumente - FMA Österreich
BE	Belgium	Financial Services and Markets Authority (FSMA)	Yes	FSMA 2025 08 (French language version) FSMA 2025 08 (Dutch language version)
BG	Bulgaria	Financial Supervision Commission (FSC)	Yes	https://www.fsc.bg/wp-content/uploads/2025/06/375.pdf
HR	Croatia	Hrvatska agencija za nadzor financijskih usluga (HANFA)	Yes	HANFA - Obavijest subjektima nadzora o primjeni Zajedničkih smjernica o procjeni agregiranih godišnjih troškova i gubitaka koji su posljedica značajnih IKT incidenata u skladu s Uredbom (EU) 2022/2554 (JC 2024 34)
CY	Cyprus			Non-compliance by default, pending designation by the Member State of the Competent Authority for the jurisdiction

		Competent authority	Complies or intends to comply	Comments
CZ	Czech Republic	Czech National Bank (CNB)	Yes	https://www.cnb.cz/cs/dohled-financni-trh/legislativni-zakladna/digitalni-provozni-odolnost/metodicke-a-vykladove-materialy/ https://www.cnb.cz/en/supervision-financial-market/legislation/digital-operational-resilience/methodological-and-interpretative-documents/
DK	Denmark	Finanstilsynet	Yes	
EE	Estonia	Finantsinspektsioon	Yes	Finantsinspektsioon's Management Board took a decision on 5th of May 2025 to fully comply with the guidelines and apply them from the 19th of May 2025. The guidelines can be found on website: https://www.fi.ee/et/juhendid/pangandus-ja-krediit/euroopa-jarelevalveasutuste-uhissuuniste-maaruse-el-20222554-kohaste-tosiste-iktintsidentide .
ES	Spain	Comisión Nacional del Mercado de Valores (CNMV)	Yes	The Guidelines are taken into consideration by the CNMV supervisory procedure (P01 - Supervision and inspection procedures for persons and firms operating in the securities markets). Please, note section 2 (6) includes confirmation that any Guidelines and/or Recommendations issued by ESMA, in accordance with Article 16 of Regulation (EU) 1095/2010 of the European Parliament and of the Council of 24 November 2010 establishing a European Supervisory Authority, will be incorporated into this procedure, when the CNMV has confirmed it complies or intends to comply with them, as required by paragraph 3 of the such Article. We confirm that there are no other concrete measures that have been taken in our jurisdiction to implement the Guidelines into the national legal framework. In addition, these guidelines will be published on the CNMV website in the legislation section (CNMV - ESMA/EBA Guidelines and recommendations).
FI	Finland	Finanssivalvonta (FSA)	Yes	Joint Guidelines of the European Supervisory Authorities on the estimation of aggregated annual costs and losses caused by major ICT-related incidents (JC/GL/2024/34) – applicable from 19.5.2025 - 2025 - www.finanssivalvonta.fi
FR	France	Autorité des Marchés Financiers (AMF)	Yes	Résilience opérationnelle - L'AMF applique les orientations conjointes des autorités européennes de supervision sur les rapports de coûts et pertes occasionnés par des incidents majeurs liés aux TIC au titre de DORA AMF
DE	Germany	BaFin	Yes	BaFin - DORA - Treatment, classification and reporting of ICT-related ...

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EL	Greece	Hellenic Capital Market Commission (HCMC)	Yes	HCMC has published the Guidelines (both in Greek and English) http://www.hcmc.gr/el_GR/web/portal/esmaguidelines
HU	Hungary	Magyar Nemzeti Bank (MNB)	No response	
IE	Ireland	Central Bank of Ireland	Yes	The requirements of the Guidelines will be incorporated into the Central Bank of Ireland supervisory processes and practices and can be found published on the Central Bank of Ireland's website: European Supervisory Authority Guidelines Central Bank of Ireland
IT	Italy	Commissione Nazionale per le Società e la Borsa (CONSOB)	Yes	https://www.consob.it/web/area-pubblica/-/avviso-consob-del-15-maggio-2025
		Banca d'Italia	Yes	
LV	Latvia			Non-compliance by default, pending designation by the Member State of the Competent Authority for the jurisdiction
LT	Lithuania	Bank of Lithuania	Yes	https://www.lb.lt/uploads/documents/docs/53046_d9561047c383051eb00b6b9e92d3dd39.pdf
LU	Luxembourg	Commission de Surveillance du Secteur Financier (CSSF)	Yes	Circular CSSF 25/892 – CSSF
MT	Malta	Malta Financial Services Authority (MFSA)	Yes	The Malta Financial Services Authority (the 'MFSA') is compliant with the Joint Guidelines on the estimation of aggregated annual costs and losses caused by major ICT-related incidents under the DORA (JC/GL/2024/34) through the 'Major ICT-Related Incident Reporting and Management' procedure established by the MFSA.

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					The aforementioned procedure is largely based on Chapter III (ICT-related incident management, classification, and reporting) of Regulation (EU) 2022/2554 (the 'DORA'). The procedure applies to all reported Major ICT-Related Incidents and duly outlines the Authority's response to Major ICT-Related Incidents, including receiving, managing, recording and other responsibilities. Reference to the Joint Guidelines is included in an Annex - 'Costs and Losses', appended to the procedure at issue. This Annex mentions that in line with Article 11(10) and (11) of DORA, and the Joint Guidelines, FEs (other than microenterprises) shall report to competent authorities, upon the Authority's request, an estimation of aggregated annual costs and losses caused by Major ICT-Related Incidents. The template which shall be used for reporting annual costs and losses, is found in the Joint Guidelines itself. The Annex, in line with the Joint Guidelines, further explains what should be reported and how the Financial Entities should estimate the aggregated annual costs and losses. It has also been noted that all credit Institutions, both Sis and LSIs, will be reporting costs and losses through the ECB standard ICT Risk Questionnaire as part of the 'SREP' process.
NL	Netherlands	Autoriteit Financiële Markten (Authority for the Financial Markets)		Yes	
PL	Poland	Komisja Nadzoru Finansowego (KNF)		Yes	As part of the implementation process, a reporting form (in Polish) has been prepared, in line with the Annex to the Guidelines. This form will be used to collect the relevant information in the event of a request by a supervisory authority under Article 11(10) DORA. Additionally, work has been carried out to design a process for obtaining the requested information in accordance with Article 11(10) of the DORA and the Guidelines.
PT	Portugal				Non-compliance by default, pending designation by the Member State of the Competent Authority for the jurisdiction.
RO	Romania	Romanian Financial Supervisory		Intends to comply*	The Romanian Financial Supervisory Authority (ASF) shall develop, by the end of August 2025, an internal procedure regarding the compliance with the Joint Guidelines on the

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		Authority (ASF)		estimation of aggregated costs/losses caused by major ICT-related incidents. Currently, the process of adoption of the national law for establishing the measures implementing the DORA regulation is following the national procedure after being agreed between ASF and the National Bank of Romania (BNR). Subsequently, ASF will upgrade internal procedures in terms of supervision, by comprising all aspects related to DORA supervision, including the aspects mentioned in the Joint GL on costs/losses mentioned above.
SK	Slovakia	National Bank of Slovakia (NBS)	Yes	https://nbs.sk/dohlad-nad-financnym-trhom/legislativa/legislativa/detail-dokumentu/spolocne-usmernenia-z-5-juna-2024-c-jc-2024-34-o-odhade-suhrnnych-rocných-nakladov-a-strat-sposobených-zavaznými-incidentmi-suvisiacimi-s-ikt-podľa-nariadenia-eu-2022-2554/ https://nbs.sk/en/dohlad-nad-financnym-trhom/legislativa/legislativa/detail-dokumentu/joint-guidelines-of-5-june-2024-no-jc-2024-34-joint-guidelines-on-the-estimation-of-aggregated-annual-costs-and-losses-caused-by-major-ict-related-incidents-under-regulation-eu-2022-2554/
SI	Slovenia	Securities Market Agency (SMA)	Yes	SMA published the Decision on the application of the Joint Guidelines on costs and losses under DORA in the Official Gazette on May 20, 2025. The decision will enter into force on June 4, 2025.
SE	Sweden	Finansinspektionen (FI)	Yes	FI följer riktlinjer om uppskattning av kostnader orsakade av allvarliga IKT-incidenter Finansinspektionen
EEA EFTA States **				
IS	Iceland	Central Bank of Iceland	Intends to comply*	DORA is expected to be implemented into Icelandic legislation in the second half of 2025.
LI	Liechtenstein	Finanzmarktaufsicht (FMA)	Yes	The guidelines are published on FMA's website: fma.li/de/regulierung/regulierungen-der-europaischen-aufsichtsbehorden/guidelines.html
NO	Norway	Finanstilsynet	Intends to comply*	The financial supervisory authority of Norway intends to comply with the guidelines when necessary legislative proceedings to implement the Digital Operational Resilience Act in Norwegian legislation have been completed.

* Please note that, in the interest of transparency, if a competent authority continues to intend to comply after the application date, it will be considered “non-compliant” unless (A) the guidelines or recommendations relate to a type of institution or instruments which do not currently exist in the jurisdiction concerned; or (B) legislative or regulatory proceedings have been initiated to bring any national measures necessary to comply with the guidelines or recommendations in force in the jurisdiction concerned.

**The competent authorities of the EEA States other than the Member States of the European Union are required to notify their compliance with ESMA’s guidelines or recommendations relating to a legal act that has been incorporated in the EEA Agreement. This compliance table reports on guidelines relating to Regulation EU 2022/2554 which has been incorporated in the EEA Agreement.

Notes

Article 16(3) of Regulation (EU) No 1095/2010 (the ESMA Regulation) requires national competent authorities to inform us whether they comply or intend to comply with each set of guidelines or recommendations we issue. If a competent authority does not comply or does not intend to comply it must inform us of the reasons. We decide on a case by case basis whether to publish reasons.

ESMA endeavours to ensure the accuracy of this document, however, the information is provided by the competent authorities and, as such, ESMA cannot accept responsibility for its content or any reliance placed on it.

For further information on the current position of any competent authority, please contact that competent authority. Contact details can be obtained from our website (www.esma.europa.eu).