



CREDIT DATA REPORTING (LUOTI) REPORTING INSTRUCTIONS

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1 INTRODUCTION

1.1 Grounds for collecting credit data and purpose of use of the data

The Bank of Finland collects instrument-level data from credit institutions on credit extended to other parties than natural persons. The Bank of Finland's authority to obtain information is based on the European Union Regulation concerning the collection of statistical information by the European Central Bank (2533/98, amended by 2015/373) and sections 26 and 28 of the Act on the Bank of Finland (214/1998).

The content of credit data reporting is based on Regulation (EU) 2016/867 of the European Central Bank on the collection of granular credit and credit risk data (ECB/2016/13), hereinafter "AnaCredit Regulation". The credit data to be reported to the Bank of Finland has been supplemented by national requirements.

The data collection is primarily driven by a mandatory Regulation. The data requirements of the Regulation has been supplemented by the ECB by three manuals. The manuals clarify the instructions of the Regulation and provide many examples. In some respects, the manuals highlight specifications that contradict with the Regulation. We have sought to highlight these contradictions and instruct which guidance to follow in reporting.

These reporting instructions are the primary source of instructions for reporting to the Bank of Finland. The reporting instructions contain special national data requirements and a general description of reporting from a technical perspective. The document "Credit data collection – Description of electronic reporting" describes the technical details of the reporting.¹

Credit data is collected for the conduct of the tasks of the Bank of Finland and the European System of Central Banks. The data is used for among other things in statistical purposes, to support monetary-policy decision making and monitoring the effects of decisions taken as well as analysis of the financial markets and macroprudential stability.

1.2 Data providers and granting of reporting concessions

In Finland, entities obliged to report data within the scope of credit data reporting comprise such domestic credit institutions and branches of foreign credit institutions operating in Finland that have been separately informed by the Bank of Finland of their reporting obligation.

A party under the reporting obligation mean reporting agents referred to in the AnaCredit Regulation. A credit institution specified as a reporting agent is obliged to submit specific counterparty and credit data to the Bank of Finland.

¹<https://www.suomenpankki.fi/en/statistics/to-the-reporter/analytical-credit-database/?epslanguage=en>



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An observed agent is the level at which the reporting agent must provide the credit data to the Bank of Finland. A party under the reporting obligation is always an observed agent. In addition, an observed agent may also be a branch of a party under the reporting obligation, whose data must be provided by the party under the reporting obligation to the Bank of Finland in accordance with the specified reporting obligations.

In this document, a *data provider* refers to the party submitting the report to the Bank of Finland. The data provider may be either the credit institution under the reporting obligation or a separate technical data provider.

The AnaCredit Regulation applies to all credit institutions based in the monetary union. In accordance with Article 7, paragraph 1 of Regulation (EC) No 2533/98, the ECB may impose sanctions on reporting agents which fail to comply with the statistical reporting obligations imposed in regulations or decisions.

Entities under the reporting obligation are informed of the beginning of the reporting obligation and end of reporting concession at the latest 18 months before reporting begins. The disclosure obligations of entities under the reporting obligation are checked annually on the basis of the credit stock under the Regulation concerning the balance sheet of the monetary financial institutions sector (ECB/2013/33 (amended by ECB/2014/51, repealed by ECB/2021/2)). In the context of a merger or demerger, the reporting obligations of previous obliged agents continue without a 18-month transitional period.

The data are reported at both a monthly and quarterly frequency. The monthly data are reported to the Bank of Finland by the 15th banking day of the month following the reference date. Quarterly data are reported using the reporting schedule of the Finrep data collection by the Financial Supervisory Authority (12 May, 11 August, 11 November and 11 February). The Bank of Finland publishes a reporting calendar on its website, indicating the specific deadlines.

1.3 Content and scope of credit data collection

The credit data collection covers credit on a credit institution's balance sheet extended to other counterparties than natural persons. In addition to on-balance-sheet credit, also off-balance-sheet commitments, where a customer may draw credit, fall within the scope of reporting subject to certain criteria.

The data are reported at the level of an individual credit instrument. If the debtor is a monetary financial institution, the contract is reported in credit data collection as a deposit. The division into deposits and loans is based on Regulation (EU) No 549/2013 providing on the calculation of national accounts. According to the Regulation, transactions between credit institutions are considered deposits. The idea is that items between credit institutions are reported using the same instrument type regardless of whether they are debts or receivables.

The observed agent only reports its assets and never its deposit liabilities, even if the counterparty is a credit institution.



Other instruments than credits and deposits falling within the definition are not reported in the credit data collection.

1.4 How to report

The Bank of Finland receives the reported data via the eRegulatory data collection service provided by Regnology France. The system is the same used in reporting to the FIN-FSA.

The credit institution under the reporting obligation is responsible for the accuracy of the data submitted to the Bank of Finland and for fulfilment of the reporting obligation.

Access authorisations for the new Reporting System will operate via the Suomi.fi e-Authorisations service, and reporters will manage the access authorisations themselves. Reporters must have access authorisations, which the reporting entity has granted to them in the Suomi.fi service, before reporting for the first time.

1.5 National special features

The Bank of Finland's data collection deviates from the ECB's definitions both in terms of the record structure and to some extent also the content. The purpose of national special features is to facilitate reporting and guarantee fulfilment of national statistical requirements.

The AnaCredit Regulation states that if a customer's credits in total amount to less than €25,000, they are not reported. The Bank of Finland has agreed with data providers that the €25,000 threshold does not apply. All credits are reported to the Bank of Finland regardless of their amount.

Some of the data under the AnaCredit Regulation are defined as changing rarely and some more regularly. In accordance with the AnaCredit Regulation, the data that changes rarely are only reported when they change. All records and data are always reported to the Bank of Finland as complete cross-section records.

The data are reported to the Bank of Finland using a table structure different from the AnaCredit Regulation. The data to be reported include national extensions. These instructions mention specifically which data are national extensions. The attributes are presented in the instructions on the basis of the Bank of Finland's record structure.

The credit data reporting does not include the the so-called NEVS attributes (Null Explanatory Values) used in the ECB's AnaCredit reporting. The ECB's NEVS attributes are derived on the basis of the content of the credit data reporting attributes.



1.6 When does a credit fall within the scope of reporting?

In credit data collection, a credit falls within the scope of reporting when it is available for the debtor to be drawn, i.e. when both the contract and instrument identifier exist.

A separate limit contract may be entered into by the observed agent and customer for the maximum future credit amount, but the contract itself is not reported into the AnaCredit system. Only after the terms and conditions of the limit contract have materialised as an individual credit, the applicable part of the contract may fall within the scope of reporting.

The following dates are related to the establishment of a credit

- credit inception date is the day when the contract identifier was created, and the contract identifier alone does not trigger the reporting requirement
- creation date of the instrument identifier is the date when the terms and conditions specified in the contract are executed or may be executed for the first time, and then the credit falls within the scope of the reporting requirements.
- settlement date, when the debtor draws credit for the first time

Example 1: Inception and settlement date (adapted from the example presented in Section 3.4.5 of the Manual)

Observed agent and debtor sign credit contract (CTRC#1) on 15 March 2019. Observed agent informs the debtor on 25 March 2019 that a single-tranche credit (€50,000) is available to be drawn or used. The debtor draws the credit on 5 April 2019.

Reporting on 31 March 2019

- reported because “Contract identifier” and “Instrument identifier” exist, i.e. the credit is available to be drawn by the debtor.
- Inception date 15 March 2019
- Revolving credit = No
- Credit lines other than revolving credit = No
- Outstanding nominal amount €0
- Off-balance sheet amount €50,000
- Inception date 15 March 2019
- Settlement date not reported (does not exist)

Reporting date 30 April 2019

- Inception date 15 March 2019
- Revolving credit = No
- Credit lines other than revolving credit = No
- Outstanding nominal amount €50,000
- Inception date 15 March 2019
- Settlement date 5 April 2019



- Off-balance sheet amount not reported

1.7 Data retention period

Reporters are obliged to retain reports submitted for the Bank of Finland's credit data reporting for five (5) years. This obligation refers to ZIP-formatted report files.

In developing their internal reporting systems, reporters should consider the possibility to create reports retrospectively for the purpose of revising previously submitted data. The potential need for revision reports extends 12 months back from the detection of an error. The Bank of Finland may also request the submission of revisions for a longer period of time on account of systematically occurring significant errors

1.8 Revision policy

In connection with credit data reporting, the Bank of Finland sends so-called validation feedback to reporters. The feedback includes contracts singled out by the Bank of Finland's validation rules or outlier checks. The feedback can be retrieved through the eRegulatory service.

Errors based on validation rules indicated in the validation feedback must be revised as soon as possible. If a credit granted by the reporter differs from a validation rule by its nature, the Bank of Finland must be notified thereof. As a rule, the validation rules are certain errors and can only be confirmed in exceptional cases.

Outlier checks are concerned with suspicious findings. These findings are outside the threshold values defined by the Bank of Finland. Most values have an upper and lower reference value. If the outliers are correct, they are to be confirmed to the Bank of Finland. Incorrect values must be revised during the reference period.

In accordance with the ECB's revision policy, an error is considered notified to the reporter if it is stated in the validation feedback. Revision of significant errors can be requested retrospectively for a year after the detection of the error. In practice, this means that the ECB may demand revision of the entire history.

2 REPORTING MODEL (SCHEMA) AND REFERENTIAL INTEGRITY

2.1 Record structure

The Bank of Finland's reporting model consists of eight records. The ECB's record structure consists of 10 separate records. In the Bank of Finland's model, one of the ECB's tables is combined into a single table, and correspondingly one ECB table is divided into two parts. The report for each reference date is always complete, meaning that it includes each requisite attribute for each credit. Each record has so-called key identifiers enabling the explicit identification of the data in the table. An Excel file with sheets describing the contents and attributes of tables required by the ECB's data model is published on the



Bank of Finland website. The description of electronic reporting of credit data is also available on the Bank of Finland website ².

Table 1. Schema records and key identifiers linked to the templates of the AnaCredit Regulation

<i>Schema record</i>	<i>Content of the key identifier Contents</i>	<i>ECB AnaCredit Regulation template</i>
Counterparty reference record	Counterparty identifier	1
Instrument information record	Contract identifier, Instrument identifier	2, 3
Counterparty-instrument record	Contract identifier, Instrument identifier, Counterparty identifier, Counterparty role	4, 5
Protection record	Protection identifier	7
Instrument-protection record	Contract identifier, Instrument identifier, Protection identifier	8
Protection provider record	Protection identifier, Counterparty identifier	7
Counterparty risk and default record	Counterparty identifier	9, 10
Accounting record	Contract identifier, Instrument identifier	6

2.2 Key identifiers between records and referential integrity

Validation of the uniqueness of the key identifiers in the schema alone does not guarantee that a credit is completely described. The completeness of the description is ensured by referential integrity validations conducted by the Bank of Finland. Referential integrity validations entail for example that a credit described in Instrument information is also reported in the Counterparty-instrument record.

The key identifier of the “*Counterparty-instrument record*” consists of the “Contract identifier”, “Instrument identifier”, “Counterparty identifier” and “Counterparty role”.

The key identifier for the “*Instrument information record*” is a combination of the contract and instrument identifier constituting the credit. The record may contain a given combination only once, and the combination must be found in the “*Counterparty-instrument record*”. The combination is shown in the “*Counterparty-instrument record*” at least three times, but the combination must be

²<https://www.suomenpankki.fi/en/statistics/to-the-reporter/analytical-credit-database/?epslanguage=en>



described in the “*Instrument information record*”. A referential integrity validation of the validation is conducted between the records both ways.

The “*Accounting record*” is the only record in the credit data collection that is reported on a quarterly basis. The key identifier of the record is a combination of the contract and instrument identifier constituting the credit. The record may contain a given combination only once, and the combination must be found in the “*Counterparty-instrument record*”. The combination is shown in the “*Counterparty-instrument record*” at least three times, but the combination must be described in the “*Accounting record*”.

The key identifier of the “*Counterparty reference record*” is the “*Counterparty identifier*”. The key identifier of the “*Instrument-counterparty record*” describes the various counterparties to the credit, and each counterparty described must be found in the “*Counterparty reference record*”.

The key identifier of the “*Counterparty risk and default record*” is the counterparty identifier, and it is reported for the debtor (or protection provider). If the record contains the counterparty identifier, it is linked to the “*Instrument-counterparty record*”, and the debtor is linked to the credit in its key identifier.

If there is a protection, then “*Instrument-protection record*” is the key. Its key identifier is the credit (combination of the contract and instrument identifier), which is then linked to the identifier of the protection. Protection is linked to the key identifier through the “*Instrument-counterparty record*”, “*Instrument information record*” and “*Accounting record*”.

According to the AnaCredit Regulation, some attributes related to credit are such that they are reported when reporting the credit for the first time and thereafter only when the attribute value changes. In Finland, this was given up in agreement with the reporting agents, and completeness validations ensure that mandatory attributes related to a credit are reported for each period.

In order to ensure uniform processing of credit, the validations also cover exiting credit.

2.3 Attribute types

2.3.1 Code list attributes

Code list attributes have pre-determined values based on which the field values are reported. The code list values are not mostly listed in these reporting instructions.

If a code list value is reported, the value reported for the attribute must be found in the relevant code list. Some of the code list values determine whether another attribute is for example mandatory or allowed.



All code list values are available in the Excel file “BoF AnaCredit requirements” available on the Bank of Finland website.³

2.3.2 Numeric fields

Credit included in the observed agent’s receivables are used in several numeric fields in euro terms. The attributes describe the entire life of the credit from inception to amortisation.

All credits extended in other currencies than the euro must be converted into euro in connection with reporting using the average foreign exchange rate of the euro and the relevant currency as at the reference date.

Except for the attributes “Carrying amount” and “Accrued interest”, all numeric fields are positive figures. If another numeric field for a credit were negative, it would be reported as zero or omitted from credit data reporting.

All amount fields are reported using the point separator to two decimal places.

For example, €123,456.78 is reported as 123456.78.

2.3.3 Date fields

The credit data collection involves the reporting of data on dates which may be either in the past or future from the reference date, depending on the attribute. If there are limitations concerning the relationship of dates and the reference date, they are indicated in the instructions.

All date data are reported in the format yyyy-mm-dd.

For example, 10 December 2018 is reported as 2018-12-10.

2.3.4 Strings

In attributes specified as character strings, the schema does not pose standard requirements to the format of the content. String attributes may be reported either by numeric or other characters. The maximum length of a string is 255 characters.

2.3.5 Interest fields

In credit data reporting, interest rates are reported as numeric values, and the interest rate may be either positive or negative. An annual interest rate of 3.57% is reported as 0.0357 and an interest rate of -0.5% as -0.005. The reported figure may have a maximum of six decimals.

The observed agent's or banking group's prime rate is reported as follows:

³<https://www.suomenpankki.fi/en/statistics/to-the-reporter/analytical-credit-database/?epslanguage=en>



- Interest rate type = Variable
- Reference rate value = Observed agent's own reference rate
- Reference rate maturity = Overnight
- Interest rate frequency = Other frequency

3 TABLE STRUCTURE AND ATTRIBUTES

3.1 General specifications concerning attributes

All attributes in the credit data collection are mandatory if they are applicable to the credit being reported. The references to mandatoriness in the instructions indicate whether there is a validation for the attribute. When an attribute is defined as mandatory, a value must always be reported. In contrast, non-mandatory attributes may be left blank if the data is not applicable to the credit being reported.

3.1.1 General specifications in reporting counterparty data

The observed agent and/or reporting agent must use the identifiers of the counterparty consistently in all data submissions. The same identifier is always used for the same counterparty. The identifier does not change even if a counterparty becomes subject to reporting after a break. An identifier previously attached to an individual counterparty cannot be adopted again for another counterparty.

In the credit data reporting, only credits granted to legal persons are reported. If a counterparty or protection provider related to a credit is a natural person, the personal identity code and information related to the natural person are not reported. Where an aggregate account comparable to a credit is concerned, the account is not reported in the credit data collection. The party described in the counterparty data is reported only once.

Exceptions to the requirement of consistency of identifiers are the Reporting Agent Identifier and the Observed Agent Identifier. In the credit data reporting XML file, when describing data covering the entire file, the identifier is always the credit institution's MFI code (FI + business id without the hyphen), even where the internal identifier is different (e.g. 1234567890).

3.1.1.1 Reporting concessions concerning counterparty data

The Bank of Finland grants the following concessions concerning the mandatoriness of counterparty data.

- If the home country of the counterparty is Finland **and** the identifier is linked to a "Legal Entity Identifier" (LEI) (4.2) **or** the "Identifier type" (4.3) **and** "National identifier" are reported (4.5), the mandatory attributes are "Name" and "Address: country". In addition, group data are mandatory for debtors which have drawn credit on 1 September 2018 or thereafter. Other attributes are not mandatory for counterparties meeting these criteria but the data are completed on the basis of register data by the Bank of Finland.



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- b. If the home country of the counterparty is AnaCredit **and** the identifier is linked to a “Legal Entity Identifier” (LEI) (4.2) **or** the “Identifier type” (4.3) **and** “National identifier” are reported, the mandatory attributes are “Name” and “Address: country”, “Address: street”, “Address: city/town/village” and “Address: postal code”. In addition, group data are mandatory for debtors which have drawn credit on 1 September 2018 or thereafter. Other attributes are not mandatory for counterparties meeting these criteria but the data are completed on the basis of register data by the Bank of Finland.
- c. If the counterparty is an international organisation whose identifier is on the list of international organisations (4.6), the mandatory attributes are “Name” and “Address: country”. The country is reported on the basis of the visiting address of the head office. Other attributes are not mandatory for counterparties meeting these criteria, but the data are completed on the basis of register data by the Bank of Finland.

The concession does not apply to counterparties other than those domiciled in an AnaCredit country even if they have one of the abovementioned identifier types. Neither do the concessions apply to other types of identifiers than those stated above, even if the home country is an AnaCredit country.

3.1.1.2 Reporting requirements concerning mandatoriness of counterparty data

- a) Some of the attributes are mandatory for debtors (not other counterparty roles) whose home country (attribute: “Address: country”) is an AnaCredit country **and** the debtor has been granted credit on 1 September 2018 or thereafter **and** a “Legal Person Identifier” (LEI) **or** “Identifier type” **and** “National identifier” have not been reported. This data may also be reported on other counterparties.
- b) If the counterparty is a branch located in a different country than the actual legal person whose “Counterparty identifier” is reported as the identifier of the head office of the parent undertaking of the branch, the following reference data is not reported on the counterparty:
 - “Identifier of immediate parent undertaking”
 - “Identifier of ultimate parent undertaking”
 - “Legal form”
 - “Status of legal proceedings”
 - “Date of initiation of legal proceedings”
 - “Firm size”
 - “Date of enterprise size”
 - “Number of employees”
 - “Balance sheet total”
 - “Annual turnover”
- c) If the counterparty is part of public administration (“Institutional sector” starts with “13”), the following counterparty reference data are not mandatory to report:



“Status of legal proceedings”
 “Date of initiation of legal proceedings”
 “Firm size”
 “Date of enterprise size”
 “Number of employees”
 “Balance sheet total”
 “Annual turnover”

3.1.2 Stability of identifiers

Data is collected at the loan level in the credit data collection. Granular data is also being collected on protections.

The identifiers used in the credit data collection are unique and stable. The identifier for a credit or protection does not change during the life of the contract or protection. An identifier used for a credit or protection may not be used again for a different credit or protection.

In case of changes to identifiers required by a systems change, for example, please contact the Bank of Finland.

4 COUNTERPARTY REFERENCE RECORD

In the credit data reporting, the “Counterparty reference record” is used to report comprehensive data on counterparties related to the credit from other records of the credit data reporting: the “Instrument counterparties” and “Protection providers”. In addition, the “Counterparty reference record” is used to link group data to the debtor and describe the reporting credit institutions.

An Excel file with sheets describing the contents and attributes of the required tables is published on the Bank of Finland website. The “Counterparty reference record” is linked to a separate sheet (“Table 1 Requirements”) describing the requirements of this record.

In the credit data reporting, only credits granted to legal persons are reported. If a counterparty or protection provider related to a credit is a natural person, the personal identity code and information related to the natural person are not reported. Where an aggregate account comparable to a credit is concerned, the account is not reported in the credit data collection. The party described in the counterparty data is reported only once.

The key identifier of the “Counterparty reference record” is “Counterparty identifier”.

4.1 Counterparty identifier

Manual Part II, Chapter 12.4.1



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Definition: The attribute “Counterparty identifier” is used to report an identifier (internal identifier) applied by the reporting agent to uniquely identify each counterparty.

Mandatoriness: The attribute must always be reported.

Value: Counterparty identifier applied by the reporting agent.

Each counterparty must have one “Counterparty identifier”. This value will not change over time and can never be used as the counterparty identifier for any other counterparty. The counterparty identifier may be a commonly used identifier, as long as the stability criteria are met. If an company being established is reported with an internal identifier, the internal identifier reported must be reported in this field throughout the customer relationship. The same counterparty identifier is used for the counterparty’s all roles and when the counterparty is acting as a protection provider.

The identifier of an individual counterparty to a credit may change for example in the case of a merger or demerger. The Bank of Finland monitors mergers and demergers based on registers and informs the observer agent differences between the register and reported data.

4.2 Legal Entity Identifier (LEI)

Manual Part II, Chapter 12.4.2

Definition: The attribute “Legal Entity Identifier” is used to report the legal entity identifier (LEI) defined by the International Organization for Standardization.

Mandatoriness: LEI must be reported if the counterparty has adopted a Legal Entity Identifier, and this is known by the reporting agent.

Value: ISO 17442 identifier.

In the context of using the LEI, it must be ensured that it is the relevant legal entity’s LEI. For example, the parent’s LEI is not reported for a branch.

4.3 Identifier type

Manual Part II, Chapter 12.4.3

Definition: The attribute “Identifier type” is used to report the type of the identifier reported in the attribute “National identifier”.

Mandatoriness: The attribute must be reported if a “National identifier” is reported (4.5).

Value: Code list.



The ECB publishes a list of the types of national identifier used in credit data reporting. All possible national identifiers in AnaCredit countries have been identified. Each national central bank ensures that the list remains up to date. The national identifier of each AnaCredit country begins with the country code.

In addition to national identifiers, the list includes identifiers starting with GEN, which are used if there is no applicable national identifier on the list.

When using the identifier GEN_OTHER_CD, a brief description of the identifier used must be included.

4.4 Description of Other identifier type

Definition: The attribute “Description of Other identifier type” is reported if “Identifier type” is reported as “Other”.

Mandatoriness: Mandatory when using the identifier type GEN_OTHER_CD or reporting the country identifier as “Other”.

Value: String.

4.5 National identifier

Manual Part II, Chapter 12.4.3

Definition: “National identifier” is a generally used identifier code allowing the identification of a counterparty or legal person uniquely in its home country.

Mandatoriness: “National identifier” must be reported if known by the reporting agent. The attribute must be reported if a national identifier type has been reported in the “Identifier type” field (4.3).

Value: identifier.

4.6 International organisation identifier

Definition: The attribute is reported when an “International organisation” found on the code list is concerned.

Mandatoriness: Reported if the organisation identifier is found on the list.

Value: Code list.

4.7 RIAD code

The Register of Institutions and Affiliates Database (RIAD) is a register of institutions maintained by the ECB. The central bank of each member state is obliged to keep the data on its respective entities up to date.



The RIAD code may be introduced to reporters' use in credit data reporting at a later stage. At present, the RIAD code is used in reporting by the Bank of Finland to the ECB.

4.8 Head office undertaking identifier

Manual Part II, Chapter 12.4.4

Definition: The attribute "Head office undertaking identifier" is used to report the "Counterparty identifier" of the legal person on which the foreign branch is legally dependent.

Mandatoriness: This attribute is only reported for counterparties which are foreign branches. It is mandatory for foreign branches.

Value: "Counterparty identifier" applied by the reporting agent.

4.9 Immediate parent undertaking identifier

Manual Part II, Chapter 12.4.5

Definition: The attribute "Immediate parent undertaking identifier" is used to report the identifier of the legal person which is the immediate parent company of the counterparty. If the counterparty does not have a parent company, the attribute is primarily left blank. Reporting of the counterparty's own identifier is also acceptable.

Legal basis: Regulation (EU) No 575/2013. Parent undertaking has the same meaning as in the definition in Article 4(1)(15)(a) of the Regulation.

Mandatoriness: The data must be reported if the counterparty has an immediate parent company and the reporting concessions concerning counterparty data are not met (section 3.1.1.1). Group data are only mandatory for debtors which have drawn credit on 1 September 2018 or thereafter and whose domicile is in an AnaCredit country. Group data may be reported on all counterparties.

Value: "Counterparty identifier" applied by the reporting agent.

4.10 Ultimate parent undertaking identifier

Manual Part II, Chapter 12.4.6

Definition: The attribute "Ultimate parent undertaking identifier" is used to report the counterparty identifier of the legal person which is the ultimate parent company of the counterparty. If the counterparty does not have an ultimate parent company, the



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attribute is primarily left blank. Reporting of the counterparty's own identifier is also acceptable.

Legal basis: Regulation (EU) No 575/2013. Parent undertaking has the same meaning as in the definition in Article 4(1)(15)(d) of the Regulation.

Mandatoriness: The data must be reported if the counterparty has an ultimate parent company and the reporting concessions concerning counterparty data are not met (section 3.1.1.1). Group data are only mandatory for debtors which have drawn credit on 1 September 2018 or thereafter and whose domicile is in an AnaCredit country. Group data may be reported on all counterparties.

Value: "Counterparty identifier" applied by the reporting agent.

4.11 Name

Manual Part II, Chapter 12.4.7

Definition: The attribute "Name" is used to report the entire official name of the counterparty.

Mandatoriness: The value must always be reported.

Value: String.

The name is the counterparty's official trade name, not an auxiliary trade name or similar. The name is not translated into another language. If the counterparty has an official name in several languages, the name in the official language of the home country is used.

4.12 Address: Street

Manual Part II, Chapter 12.4.8

Definition: The attribute "Address: Street" is used to report the street address and house number of the counterparty in accordance with its official visiting address.

Mandatoriness: The data must be reported if the reporting concessions concerning counterparty data are not fulfilled (section 3.1.1.1).

Value: String.

In the address data, the address is reported based on the location of the counterparty, not its postal address. For example, the address of a housing company is determined based on its location and not the postal address (housing companies' postal address is often their manager's address).



4.13 Address: city/town/village

Manual Part II, Chapter 12.4.9

Definition: The attribute “Address: city/town/village” is used to report the home city, town or village of the counterparty in accordance with its official visiting address

Mandatoriness: The data must be reported if the reporting concessions concerning counterparty data are not fulfilled (section 3.1.1.1).

Value: String.

4.14 Address: postal code

Manual Part II, Chapter 12.4.10

Definition: The attribute “Address: postal code” is used to report the postal number of the counterparty in accordance with its official visiting address.

Mandatoriness: The data must be reported if the reporting concessions concerning counterparty data are not fulfilled (section 3.1.1.1).

Value: String.

4.15 Address: country

Manual Part II, Chapter 12.4.12

Definition: The attribute “Address: country” is used to report the country code of the counterparty.

Mandatoriness: The attribute must always be reported.

Value: Code list (ISO 3166-1).

4.16 Legal form

Manual Part II, Chapter 12.4.13

Definition: The attribute “Legal form” is used to report the type of business entity as defined in the national legal system.

Mandatoriness: The data must be reported if the reporting concessions concerning counterparty data are not fulfilled (section 3.1.1.1).

Value: Code list.

Legal forms are reported at three different levels of detail. The ECB maintains a comprehensive list of the national legal forms of the AnaCredit countries. In



addition, there are pan-European legal forms in the European Union. There is a separate list of legal forms for counterparties outside the European Union.

4.17 Institutional sector

Manual Part II, Chapter 12.4.14

Definition: The attribute “Institutional sector” is used to report the institutional sector in accordance with the national sectoral classification of Statistics Finland (2023). The exceptions are the sector codes Local government excl. wellbeing services county administration (S.13131) and Wellbeing services county administration (S.13132), which are not used in credit data reporting. The institutional sector is linked to the counterparty, and it is possible for the sector of the branch to differ from the branch of the head office.

Legal basis: Regulation (EU) No 549/2013, Regulation (EU) No 575/2013 and ECB Regulation (EU) No 1075/2013 (ECB/2013/40). The sectoral classification is derived on the basis of these Regulations.

Mandatoriness: The data must be reported if the reporting concessions concerning counterparty data are not fulfilled (section 3.1.1.1).

Value: Code list.

Although the official Finnish sectoral classification includes the sector “rest of the world (S.2)”, sectors based on the S.1 classification are used for all counterparties, with the exceptions below.

Sectors reserved for only foreign entities are:

- State government (S.1312)
- Local government (S.1313, domestic local government are subject to a more detailed breakdown)
- Social security funds (S.1314, domestic social security funds are subject to a more detailed breakdown)

Sectors reserved for only domestic entities are:

- Housing corporations (S.112 and its subsectors)
- Local government subsector: The Åland Government (S.131313)
- Wellbeing services county administration subsectors: Wellbeing services counties (S.131321), Joint county authorities for wellbeing services (S.131322), Other units of wellbeing services county administration (S.131329)
- Social security funds subsector: Employment pension schemes (S.13141)
- Social security funds subsector: Other social security funds (S.13149)



The ECB's sectoral classification differs from the the European System of Accounts (ESA 2010) with respect to the subsector "Other financial intermediaries". In the ECBs statistics, this sector is divided into two subsectors:

- Financial vehicle corporations engaged in securitisation transactions
- Other financial intermediaries

The ECB subsectors are not reported in credit data reporting, but the entity is included in the sector "Other financial intermediaries". The Bank of Finland itself allocates the counterparties to the ECB sectors using a list of financial vehicle corporations engaged in securitisation transactions maintained by the ECB.

4.18 Economic activity

Manual Part II, Chapter 12.4.15

Definition: The classification of counterparties by economic activity is made using the NACE rev. 2 statistical classification. If the counterparty is a conglomerate, its principal economic activity is reported. The economic activity data may be reported at the lowest level (five numbers, Bank of Finland's preference), but it is mandatory at the level of five numbers).

Legal basis: Regulation (EC) No 1893/2006 of the European Parliament and of the Council

Mandatoriness: The data must be reported if the reporting concessions concerning counterparty data are not fulfilled (section 3.1.1.1).

Value: Code list.

4.19 Status of legal proceedings

Manual Part II, Chapter 12.4.16

Definition: The status of legal proceedings describes a counterparty's legal status in relation to its solvency based on the national legal framework.

Mandatoriness: The data must be reported if the debtor meets the criteria but not the reporting concessions described in section 3.1.1.2.

Value: Code list.

Since the attribute is only attached to a legal subject, the attribute "Legal status" is not reported for branches.

4.20 Date of initiation of legal proceedings

Manual Part II, Chapter 12.4.17



Definition: The date on which the legal proceedings reported in the “Status of legal proceedings” were initiated. The date should be the most recent revision date prior to the reporting date.

Mandatoriness: The data must be reported if the debtor meets the criteria but not the reporting concessions described in section 3.1.1.2.

Value: Date.

If the credit has been serviced throughout the loan period and the attribute “Legal proceedings” is reported as “No legal actions taken”, the attribute “Date of initiation of legal proceedings” is not reported at all. If value reported for the attribute changes from another value to “no legal actions taken”, the date of change must be reported since the credit has not been serviced throughout the loan period.

The attribute indicates the date when the change of the value of the attribute “Legal proceedings” was initiated, regardless of whether the initiator was the observed agent or a third party.

4.21 Enterprise size

Manual Part II, Chapter 12.4.18

Definition: The attribute “Enterprise size” classifies counterparties by size into fixed categories.

Legal basis: Commission Recommendation 2003/361/EC. The definition is in accordance with the Annex to the Recommendation.

Mandatoriness: The data must be reported if the debtor meets the criteria but not the reporting concessions described in section 3.1.1.2.

Value: Code list.

In accordance with the Commission Recommendation, enterprise size is assessed using the attributes:

- “Number of employees”
- AND/OR
- “Annual turnover”
- “Balance sheet total”

Table 2. Firm size

	Number of employees, Number		Annual turnover EUR million	Balance sheet total, EUR million
Large enterprise	≥ 250	and/ or	≥ 50	≥ 43
Medium enterprise	≥ 50 < 250		≥ 10 < 50	≥ 10 < 43



Small enterprise	$\geq 10 < 50$		$\geq 2 < 10$	$\geq 2 < 10$
Microenterprise	< 10		< 2	< 2

Size is not usually reported for counterparties not engaged in an economic activity. If the counterparty is part of the public administration, the data is not mandatory (section 3.1.1 c).

The definition of the Recommendation concerns legal subjects; hence enterprise size is not reported for branches, but data concerning branches is included in the data of the parent company.

In the case of newly established enterprises whose accounts have not been closed yet, the data are established on the basis of a reliable estimate made during the financial period.

Enterprise size is estimated on the basis of the most recent available financial statements data. The data should refer to the same reference date where possible.

4.22 Date of enterprise size

Manual Part II, Chapter 12.4.19

Definition: The date to which the value provided in the attribute “Enterprise size” refers. This is the value of the most recent date used in the classification or reclassification of the enterprise.

Mandatoriness: The data must be reported if the debtor meets the criteria but not the reporting concessions described in section 3.1.1.2.

Value: Date.

The attribute “Date of enterprise size” tracks changes in its master attribute “Enterprise size”. If enterprise size is not reported at all, then the date of enterprise size is not reported either.

4.23 Number of employees

Manual Part II, Chapter 12.4.20

Definition: The attribute “Number of employees” is used to report the number of employees working for the counterparty.

Legal basis: Commission Recommendation 2003/361/EC. The data are reported in accordance with Article 5 of the Annex.

Mandatoriness: The data must be reported if the debtor meets the criteria but not the reporting concessions described in section 3.1.1.2.

Value: Numeric.



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The main rule is that if there is a value reported for the attribute “Enterprise size”, the number of employees must also be reported.

Commission Recommendation 2003/361/EC provides as follows: The head-count corresponds to the number of annual work units (AWU), i.e. the number of persons who worked full-time within the enterprise in question or on its behalf during the entire reference year under consideration. The work of persons who have not worked the full year, the work of those who have worked part-time, regardless of duration, and the work of seasonal workers are counted as fractions of AWU.

The number of employees is a key factor in determining the value for the attribute “Enterprise size”. Enterprise size is determined by reference to the combination of the number of employees and annual turnover OR the number of employees and balance sheet total.

4.24 Balance sheet total

Manual Part II, Chapter 12.4.21

Definition: The attribute “Balance sheet total” is used to report the value of the assets on the balance sheet of the counterparty.

Legal basis: Regulation (EU) No 549/2013

Mandatoriness: The data must be reported if the debtor meets the criteria but not the reporting concessions described in section 3.1.1.2.

Value: Euro amount.

The main rule is that if there is a value reported for the attribute “Enterprise size”, the balance sheet total or annual turnover must also be reported.

In the case of newly established enterprises whose accounts have not been closed yet, the observed data are established on the basis of a reliable estimate made during the financial period.

Balance sheet total is one of the factors considered in determining the value for the attribute “Enterprise size”.

4.25 Annual turnover

Manual Part II, Chapter 12.4.22

Definition: The attribute “Annual turnover” is used to report the annual sales volume net of all discounts and sales taxes of the counterparty in accordance with Recommendation 2003/361/EC.

Legal basis: Regulation (EU) No 575/2013. The concept used in paragraph (4) of said Article 153 is “total annual sales”.



Mandatoriness: The data must be reported if the debtor meets the criteria but not the reporting concessions described in section 3.1.1.2.

Value: Euro amount.

The main rule is that if there is a value reported for the attribute “Enterprise size”, the balance sheet total or annual turnover must also be reported.

In the case of newly established enterprises whose accounts have not been closed yet, the observed data are established on the basis of a reliable estimate made during the financial period.

Annual turnover is one of the factors considered in determining the value for the attribute “Enterprise size”.

4.26 Accounting standard

Manual Part II, Chapter 12.4.23

Definition: The attribute “Accounting standard” is used to report the accounting standard used by the observed agent’s legal entity. If the reporting agent is subject to Regulation (EU) 2015/534 (ECB/2015/13), the data are recorded in accordance with the accounting standard – International Financial Reporting Standards (IFRS) or national generally accepted accounting principles (GAAP) – applied to fulfil the requirements under Regulation (EU) 2015/534 (ECB/2015/13) by the observed agent’s legal entity.

Mandatoriness: The attribute is only reported for the observed agent, not other counterparties to the credit. The attribute is not reported for other entities than observed agents.

Value: Code list.

5 INSTRUMENT INFORMATION RECORD

The “Instrument information record” is used to report the attributes in Template 2 (instrument data) and Template 3 (financial data) of the AnaCredit Regulation. The attributes in Template 2 are such that they seldom change, whereas the data in Template 3 are expected to change over time.

The key identifiers in the “Instrument information record” are “Contract identifier” and “Instrument identifier”.

The attributes of the record are divided on the basis of their nature into the following categories:

1. Common information
2. Other common information
3. Dates



4. Interest information
5. Amount information
6. Default information
7. Other information

5.1 Common information

The attributes regarded as common information are data from Template 2 of the AnaCredit Regulation.

5.1.1 Contract identifier

Part II of the Manual, Chapter 2.2.4

Definition: The attribute “Contract identifier” is used to report an internal identifier applied by the reporting agent to uniquely identify each contract between the creditor and debtor.

Mandatoriness: The attribute must always be reported.

Value: Contract identifier applied by the reporting agent.

Each contract must have one “Contract identifier”. The contract identifier is unique and stable, and it cannot be used as the contract identifier for any other contract. It is possible to record one or more instruments arising in relation to the same credit contract. Instruments recorded in relation to the same contract have the same contract identifier.

5.1.2 Instrument identifier

Part II of the Manual, Chapter 2.2.5

Definition: The attribute “Instrument identifier” is used to report an internal identifier applied by the reporting agent to uniquely identify each instrument between the creditor and debtor.

Mandatoriness: The attribute must always be reported.

Value: Instrument identifier applied by the reporting agent.

Each instrument must have one “Instrument identifier”. The instrument identifier is stable. An individual instrument identifier does not have to be unique in isolation.

It is the combination of the contract identifier and instrument identifier reported by the reporting agent that unambiguously identifies the credit for the purposes of the credit data collection.



5.1.3 Credit status

Definition: The observed agent indicates whether the instrument remains on the balance sheet in the “Credit status” attribute. A credit may exit the system only through a report submitted by a reporting agent. The field is a national extension.

Mandatoriness: The field is always mandatory.

Value: Code list.

See Section 12 EXITING CREDIT

5.1.4 Type of instrument

Manual Part II, Chapter 3.4.1

Definition: The attribute “Type of instrument” is used to report the classification of the instrument according to the type of contractual terms agreed between the parties. The code list includes national extensions.

Mandatoriness: The attribute must always be reported.

Value: Code list.

Each credit is allocated to one of the instrument categories based on its contractual terms. Credits can be broken down into two categories by debtor:

- the debtor is a credit institution, in which case the type of instrument is always a deposit
- the debtor is not a credit institution, in which case the type of instrument may not be a deposit

The division into deposits and loans is based on Regulation (EU) No 549/2013 providing on the calculation of national accounts. According to the Regulation, transactions between credit institutions are considered deposits. The idea is that items between credit institutions are reported using the same instrument type regardless of whether it is a debt or receivable. All other instrument types are credit instruments.

The observed agent only reports its assets and never its deposit liabilities, not even if the counterparty is a credit institution.

If the type of instrument is factoring, other trade receivables or other loans, the following national additional attributes are mandatory to report.

5.1.4.1 Revolving credit

Definition: “Revolving credit” refers to a credit where

- credit may be freely drawn up to an agreed credit limit



- credit may be used repeatedly
- amortisation increases the amount of available credit

5.1.4.2 Credit lines other than revolving credit

Definition: “Credit lines other than revolving credit” refer to a credit where

- credit may be freely drawn up to an agreed credit limit
- credit is drawn in several tranches
- amortisation does not increase the amount of available credit

Value: Code list.

Revolving credit and credit lines other than revolving credit are national extensions involving the alternatives “yes” or “no”. The Bank of Finland considers these attributes characteristics of the credit rather than actual types of instrument.

It is typical for revolving credits that the limit specified in the credit agreement can be re-drawn without separate agreement and the nominal amount of the credit fluctuates within the limit. In some types of instrument, revolving credit is embedded in the claim (for example extended credit card credit), and the relationship does not have to be reported.

A single-tranche credit is not a revolving credit or a credit line other than revolving credit. For example, if the borrower is a developer drawing credit in several tranches, the credit meets the definition of a credit line other than revolving credit.

The Excel file available on the Bank of Finland website⁴ (BoF AnaCredit requirements.xls) contains a sheet “Instrument type” with a table on the use of the above attributes.

5.1.5 Purpose

Manual Part II, Chapter 3.4.14

Definition: The attribute “Purpose” is used to report the purpose of use of the credit. The code list includes national extensions.

Mandatoriness: The attribute must always be reported.

Value: Code list.

If the credit is spent in several different purposes, the principal purpose is recorded. The purpose may change if the original contract is revised (renegotiation).

⁴[https://www.suomenpankki.fi/en/statistics/to-the-reporter/analytical-credit-database/?epslanguage=en /](https://www.suomenpankki.fi/en/statistics/to-the-reporter/analytical-credit-database/?epslanguage=en/)



5.1.6 Amortisation type

Manual Part II, Chapter 3.4.15

Definition: The attribute “Amortisation type” is used to report the amortisation method applied to the credit, including the principal and interest.

Mandatoriness: The attribute must always be reported.

Value: Code list.

If none of the amortisation types available describes the amortisation type of the credit, the value “Other” is reported. The value “Other” is used for example in the case of unauthorised overdrafts.

The amortisation type is assessed when a credit is drawn and does not change even if a grace period is applied to the contract.

5.1.7 Payment frequency

Manual Part II, Chapter 3.4.16

Definition: The attribute “Payment frequency” is used to report the frequency of payments due, either of principal or interest, i.e. number of months between payments.

Mandatoriness: The attribute must always be reported.

Value: Code list.

If the payment frequency is neither “bullet” nor “zero coupon” and the frequencies of principal and interest payments differ, the higher of the two payment frequencies is reported in the data attribute “payment frequency”. If accrued interest is paid quarterly and principal is amortised annually, then the repayment frequency of the credit is “quarterly”.

5.2 Other common information

The attributes regarded as common information are data from Template 2 (Instrument data) of the AnaCredit Regulation.

5.2.1 Syndicated loan

Definition: The attribute “Syndicated loan” is used to report whether the credit is part of a syndicated loan.

Mandatoriness: The attribute must always be reported.

Value: Code list.



5.2.2 Syndicated contract identifier

Manual Part II, Chapter 3.4.17

Definition: The attribute “Syndicated contract identifier” is used to report the the contract identifier applied by the lead arranger of the syndicated

contract to uniquely identify each contract. Each syndicated contract will have one syndicated contract identifier. All creditors participating in the syndicated contract must use the same syndicated contract identifier.

Mandatoriness: The attribute is conditionally mandatory, exceptions listed below.

Value: identifier.

If the attribute “Syndicated loan” is assigned the value “Yes”, the syndicated contract identifier must be reported.

If there is no syndicated contract identifier for a syndicated loan, a replacement identifier is formed as follows:

- lead arranger's BIC code (ISO 9362)
- hyphen
- inception date of the credit
- Example: BIC-15/02/2019

5.2.3 Fiduciary instrument

Manual Part II, Chapter 3.4.20

Definition: The attribute “Fiduciary instrument” is used to report credits in which the observed agent acts in its own name but on behalf of and with the risk borne by a third party.

Mandatoriness: The attribute must always be reported.

Value: Code list.

Normally, where a credit is a fiduciary instrument, the trustor acts as the creditor, and the observed agent acts both as the trustee and servicer. Credits are classified as fiduciary instruments upon inception.

If the observed agent securitises credits off its balance sheet (traditional securitisation) but continues as its servicer, these credits are not recorded as fiduciary instruments.



5.2.4 Project finance loan

Manual Part II, Chapter 3.4.2

Definition: The attribute “Project finance loan” is used to identify project finance loans. Project finance loans are loans whose repayment is fully based on the object being financed.

Mandatoriness: The attribute must always be reported.

Value: Code list.

Common characteristics of project finance:

- the loan is granted to an entity which was created specifically to finance or operate physical assets (special purpose entity SPE) whose activities are solely limited to the construction, ownership and operation of the project object
- the creditor obtains a substantial degree of control over the assets
- the primary source of repayment of the obligation is the income generated by the assets being financed

Credits related to project finance are typically assigned the value “Yes” for the attribute “Credit lines other than revolving credit”, since the project receives more funding as the construction of the project object advances towards completion. Usually, the project object itself is used as protection for project finance and the attribute “Protection type” is reported as “Other physical collaterals”.

5.2.5 Subordinated debt

Manual Part II, Chapter 3.4.18

Definition: The attribute “Subordinated debt” is used to report debts ranking junior to other debt. Subordinated debt instruments provide a subsidiary claim on the issuing institution that can only be exercised after all claims with a higher status (e.g. deposits/loans) have been satisfied.

Mandatoriness: The attribute must always be reported.

Value: Code list.

A claim reported by the observed agent as “Subordinated debt” can be can only be exercised after all claims with a higher status have been satisfied.

5.2.6 Repayment rights

Manual Part II, Chapter 3.4.19

Definition: The attribute “Repayment rights” is used to report the right of the creditor to claim the repayment of the exposure.



Mandatoriness: The attribute must always be reported.

Value: Code list.

Credits repayable on demand or short notice include, for example:

- inter-MFI deposits payable on demand
- credits repayable by close of business on the day following that on which the demand was made
- credits repayable overnight

Credits assigned the value “Other” for the attribute “Repayment rights” are not reclassified for example as a consequence of a temporary limit overrun. Although the limit overrun must be repaid immediately, it does not change the status of the credit itself.

5.2.7 Recourse

Manual Part II, Chapter 3.4.7

Definition: The attribute “Recourse” is used to report the classification of instruments based on the creditor’s rights to seize assets other than any protection pledged to secure the instrument.

Mandatoriness: The attribute must always be reported.

Value: Code list.

If there is a “Recourse” attached to a credit, the creditor has the right to require the debtor to produce additional protection or collateral in addition to the originally agreed protection. Recourse is often related to trade credit.

5.3 Dates

The attributes regarded as dates are data from Template 2 of the AnaCredit Regulation.

5.3.1 Inception date

Manual Part II, Chapter 3.4.4

Definition: The attribute “Inception date” is used to report the date on which the contractual relationship originated, i.e. the date on which the contract became binding for all parties.

Mandatoriness: The attribute must always be reported.

Value: Date.



On the inception date, the credit prerequisite “Contract identifier” exists. The inception date alone does not give rise to the reporting obligation, since the attribute “Instrument identifier” does not necessarily exist yet. The attribute “Instrument identifier” is created when the debtor has the possibility to draw credit, which gives rise to the reporting obligation by the observed agent.

The attribute “Inception date” for a reported credit does not change even if the contract related to the credit is revised. If the parties together decide to decrease or increase the limit of the credit, the change date is recorded (at the end of the quarter) in the attribute “Date of the forbearance and renegotiation status”.

In the case of a transferred credit, the transferee must report the inception date of the original credit as the inception date. If the transferee (and new servicer) establishes a new credit using a new combination of contract and instrument identifiers and the initial inception date is unknown, the inception date may also be another date.

5.3.2 Settlement date

Manual Part II, Chapter 3.4.5

Definition: The attribute “Settlement date” is used to report the date when the credit was drawn for the first time. Settlement date cannot be earlier than the reported inception date.

Mandatoriness: The settlement date must be reported when the outstanding nominal amount is for the first time higher than zero. Thereafter, the attribute is always mandatory.

Value: Date.

The attribute “Settlement date” is defined differently in the Regulation and the Manual. The Bank of Finland applies the definition of the Manual.

5.3.3 Legal final maturity date

Manual Part II, Chapter 3.4.6

Definition: The attribute “Legal final maturity date” is used to report the contractual maturity date of the instrument, taking into account any agreements amending initial contracts.

Mandatoriness: The attribute is conditionally mandatory, exceptions listed below.

Value: Date.

The contractual terms usually specify a binding maturity date. If the credit is not renegotiated, the date as a rule remains unchanged throughout the validity of contract. Certain types of instruments, such as credit cards, unauthorised limit



or account overdrafts and repayment agreements do not necessarily have a legal final maturity date. Similarly, credit whose attribute “Repayment rights” is assigned the value “On demand or at short notice” often have no final maturity date.

If the contract is amended or the maturity date under the original contractual terms may change, the legal final maturity date may change. If the contractual terms are revised with respect to the legal final maturity date, the changing maturity date is determined by the changed data in the attributes “Status of forbearance and renegotiation” and “Date of the forbearance and renegotiation status”.

The reporting obligation regarding the credit does not necessarily cease on the final maturity date, for example if there is still “Outstanding nominal amount”.

If the credit does not involve a final maturity date, the field in the scheme is left completely unreported.

5.4 Interest information

In the data model used in the credit data reporting, the interest rate related to a credit is described by eleven attributes. Attributes concerning interest information are read from AnaCredit Template 2 (Instrument data) as well as Template 3 (Financial data). Interest information includes numeric and date data as well as code list attributes.

5.4.1 Interest rate type

Manual Part II, Chapter 3.4.8

Definition: The attribute “Interest rate type” is used to report the type of interest rate used for establishing the interest rate for each payment period.

Mandatoriness: The attribute must always be reported.

Value: Code list.

“Interest rate type” is reported as from the inception date. If the interest rate type is reported as mixed at the inception date, the interest rate type does not change into fixed or variable on the date when the rate changes from fixed to variable or vice versa. The change was taken into account already by the initially reported mixed classification.

If the interest rate type is fixed and the value of the fixed rate is renegotiable on the basis of the contract, the interest rate type is fixed even if the charged interest rate were to change later on due to such negotiation.

The interest rate type may change during the life of a credit if the relevant contract terms are revised. Negotiations leading to a change are reported using



the attributes “Status of forbearance and renegotiation” and “Date of the forbearance and renegotiation status”.

The Bank of Finland’s code list includes the value “Not applicable” for the attribute “Interest rate type”. Examples of credit not considered in the terms and conditions of a credit contract include unauthorised limit or account overdrafts.

5.4.2 End date of interest-only period

Manual Part II, Chapter 3.4.10

Definition: The attribute “End date of interest-only period” is used to report the date on which the interest-only period ends.

Mandatoriness: For credits that have never involved grace periods, the attribute “End date of interest-only period” is left unreported.

Value: Date.

Interest-only is an instrument for which, for a contractually set period, only the interest on the principal balance is paid. The outstanding nominal amount remains unchanged during the period.

If the credit has included a grace period, the attribute is used to report the end date of the latest grace period.

5.4.3 Next interest rate reset date

Manual Part II, Chapter 4.4.2

Definition: The attribute is used to report the date when the next interest rate reset will take place.

Legal basis: Regulation (EU) No 1071/2013 (ECB/2013/33). The definition is found in Part 3 of Annex I to the Regulation.

Mandatoriness: The attribute is conditionally mandatory, exceptions listed below.

Value: Date.

“Next interest rate reset date” is reported for credits which have a contractual interest rate reset date regardless of the interest rate type. The next interest rate reset date is always in the future after the reporting reference date.

If the last interest reset date provided in the credit contract has passed at the reference date, the attribute is not reported.

If the interest rate will not be reset during the entire life of the credit, the attribute is not reported.



According to the original definition, “If the instrument is not subject to a future interest rate reset, its legal final maturity date will be reported”. Reporting is clarified in the Manual as described above, i.e. the attribute is not mandatory. The Bank of Finland applies the above definition.

5.4.4 Interest rate reset frequency

Manual Part II, Chapter 3.4.9

Definition: The attribute “Interest rate reset frequency” is used to report the frequency at which the interest rate is reset after the initial fixed-rate period.

Mandatoriness: The attribute must always be reported.

Value: code list.

“Interest rate reset frequency” is reported in accordance with the jointly agreed contractual terms. The value “At creditor discretion” is the only option where the reset frequency is unilaterally determined by the creditor’s decision.

If the credit does not include the possibility of interest rate reset (for example fixed-rate credits and credits with short maturity), the attribute is assigned the value “Not resettable or not applicable”. In this case, the attribute “Next interest rate reset date” is not reported.

If the attribute “Interest rate type” is assigned the value “Mixed”, then both fixed and variable maturities are reported as “Not resettable or not applicable”.

The alternative “Other frequency” is used for the attribute for example when the interest rate on a credit linked to a variable rate is reset in another frequency than “Overnight”, “Monthly”, “Quarterly” “Semi-Annual” or “Annual”. For example, if the reset frequency is tri-annual, then it must be reported using the value “Other frequency”, since the tri-annual frequency is not on the code list.

5.4.5 Interest rate cap

Manual Part II, Chapter 3.4.13

Definition: The attribute “Interest rate cap” is used to report the maximum amount of interest charged.

Mandatoriness: The attribute is not mandatory.

Value: Interest rate percentage.

The interest rate cap and floor determine the range in which the interest rate may fluctuate. If the contract does not have an interest rate cap, the attribute is not reported.



If the interest rate applicable to the credit exceeds the interest rate cap, the interest on the loan is the interest rate cap instead of the applicable interest rate.

5.4.6 Interest rate floor

Manual Part II, Chapter 3.4.13

Definition: The attribute “Interest rate floor” is used to report the minimum amount of interest charged.

Mandatoriness: The attribute is not mandatory.

Value: Interest rate percentage.

The interest rate cap and floor determine the range in which the interest rate may fluctuate. If the contract does not have an interest rate floor, the attribute is not reported.

If the interest rate applicable to the credit is lower than the interest rate floor, the interest on the loan is the interest rate floor instead of the applicable interest rate.

If the credit contract includes a term that the reference rate may not be negative, the term is not considered an interest rate floor.

5.4.7 Reference rate

Manual Part II, Chapter 3.4.11

In the Bank of Finland’s credit data reporting, reporting of the “Reference rate” attribute under the AnaCredit Regulation takes place through two attributes: “Reference rate value” and “Reference rate maturity”. The classification enables connection with the RATI data collection. The Bank of Finland attaches the values of the national attributes in submitting the data under the AnaCredit Regulation to the ECB.

5.4.7.1 Reference rate value

Definition: The “Reference rate value” is the reference rate used in the calculation of the actual interest rate.

Mandatoriness: The attribute must always be reported.

Value: code.

If the interest rate on a credit is determined by reference to more than one reference rates, the attribute is assigned the value “Other multiple reference rates”.



If the credit is subject to a fixed interest rate on the reference data and the attribute “Interest type” is assigned the value “Fixed”, “Mixed” or “Not applicable”, then “Reference rate value” is assigned the value “Not applicable”.

If the credit is subject to a variable interest rate on the reference data and the attribute “Interest type” is assigned the value “Variable” or “Mixed”, then “Reference rate value” cannot be assigned the value “Not applicable”.

On the Bank of Finland’s code list, the Regulation value “Other single reference rates” is divided into three parts:

- “Observed agent’s own reference rate” (so-called prime rates)
- “Index or derivative”
- “Other single reference rates”

5.4.7.2 Reference rate maturity

Definition: The “Reference rate maturity” is the maturity of the reference rate used in the calculation of the actual interest rate.

Mandatoriness: The attribute must always be reported.

Value: code.

If the credit attribute “Interest rate type” is assigned the value “Fixed”, then the reference rate maturity is reported as “Not applicable”.

The observed agent’s own or banking group’s common prime rate is reported in the attribute “Reference rate value” as “Observed agent’s own reference rate”, and the attribute “Reference rate maturity” is reported as “Overnight”. This is based on the notion that the prime rate is changed at the observed agent’s own administrative decision. Theoretically, the prime rate is assessed on a daily basis, which means that the reset date cannot be anticipated.

5.4.8 Interest rate spread/margin

Manual Part II, Chapter 3.4.12

Definition: The attribute “Interest rate spread/margin” is used to report the margin or spread added to the reference rate when calculating the actual interest rate stated in basis points.

Mandatoriness: The attribute is conditionally mandatory, exceptions listed below.

Value: Interest rate percentage.

Margin is reported for credits subject to a variable rate at the reference date. The attribute “Interest rate type” is assigned the value “Variable” or “Mixed”,



and the interest rate is described by the attributes “Reference rate value” and “Reference rate maturity”.

The attribute “Interest rate spread/margin” is not reported for the credit if the attribute “Interest rate type” is assigned the value “Fixed” or the attribute “Interest rate type” is assigned another value than “Fixed” and no margin is applied in accordance with the contractual terms.

5.4.9 Interest rate

Manual Part II, Chapter 4.4.1

Definition: The attribute “Interest rate” is used to report the annualised agreed rate.

Legal basis: Regulation of the European Central Bank (EU) No 1072/2013 (ECB/2013/34). Interest rate in accordance with the Regulation.

Mandatoriness: The attribute must always be reported.

Value: Interest rate percentage.

Undrawn credit amounts (off-balance sheet amount) are not considered for the calculation of the interest rate.

5.5 Amount information

The amount information includes a total of 5 attributes, 2 of which from Regulation Template 2 (Instrument data) and 3 from Template 3 (Financial data). One of the amount information items, the currency, is based on a code list.

5.5.1 Accrued interest

Manual Part II, Chapter 4.4.11

Definition: The attribute “Accrued interest” is used to report the amount of interest accrued on loans at the reporting reference date. In accordance with the general principle of accruals accounting, interest receivable on instruments should be subject to on-balance sheet recording as it accrues (i.e. on an accruals basis) rather than when it is actually received (i.e. on a cash basis).

Legal basis: Regulation (EU) No 1071/2013 (ECB/2013/33).

Mandatoriness: The attribute must always be reported.

Value: Euro amount.



Accrued interest is calculated for all credits regardless of whether they are valued in the financial statements at depreciated cost or at fair value. Accrued interest normally refer to unpaid interest rates accrued between the previous interest payment date and the reference date.

If the unpaid interest is capitalised to the outstanding nominal amount, the corresponding amount is deducted from the amount of accrued interest.

5.5.2 Currency

Manual Part II, Chapter 3.4.3

Definition: The attribute “Currency” is used to report the currency denomination of instruments, in accordance with the ISO 4217 standard.

Mandatoriness: The attribute must always be reported.

Value: code list.

The values of credits denominated in any other currency than the euro are converted into euro at the mid-rate on the reporting reference date.

Only one currency is indexed to the credit. If a credit agreements allows credit to be drawn in different currencies, a separate credit should be established for each currency (“Instrument identifier”).

If credit has been drawn in several currencies without establishing separate credits, the currency to be chosen is the one assumed to be the most significant. The currency is not changed during the life of the credit except subject to a separate agreement revising the contractual terms.

If principal and interest are paid in different currencies, reporting is based on the currency in which the principal is denominated.

5.5.3 Commitment amount at inception

Manual Part II, Chapter 3.4.21

Definition: The attribute “Commitment amount at inception” is used to report the maximum amount of credit risk exposure of the observed agent on the inception date of the instrument without taking any protection received or other credit risk mitigation arrangements into account Total commitment amount at inception is established during the approval process and is intended to restrict an observed agent’s amount of credit risk to a given counterparty for the relevant instrument.

Mandatoriness: The attribute is conditionally mandatory, exceptions listed below.



Value: Euro amount.

The commitment amount must always be reported where the credit is drawn in tranches, i.e. the attribute “Credit lines other than revolving credit” is assigned the value “Yes” or in the case of a single-tranche credit.

In the case of revolving credit, the commitment amount at inception can usually be reported. As an exception, in circumstances where a debtor has several limits, the commitment amount at inception cannot be determined.

This attribute is not reported for unauthorised limit overruns. If the terms of a credit agreement are changed during the life of the credit so that the credit amount is increased, this does not affect the value of the “Commitment amount at inception”.

The commitment amount at inception does not change over time. Even if a credit drawn in instalments is not ultimately drawn in full, the amount at inception does not change.

5.5.4 Outstanding nominal amount

Manual Part II, Chapter 4.4.9

Definition: The attribute “Outstanding nominal amount” is used to report the principal amount outstanding at the end of the reference date, including unpaid past due interest but excluding accrued interest. “Outstanding nominal amount” must be reported in gross terms, as determined by the relevant accounting practices. Accumulated changes in fair value are not deducted, as they are reported in a separate field. Accrued and recognised write-offs reduce the outstanding nominal amount in full.

Mandatoriness: The attribute must always be reported.

Value: Euro amount.

Outstanding nominal amount is reported in gross terms. The outstanding nominal amount is not netted in any way, for example, against protection, even if the credit were 100% protected using highly liquid instruments. Outstanding nominal amount does not include accrued interest, since it is reported as a separate attribute (5.5.1).

Outstanding nominal amount is reported without taking into account the (reducing) impact of the attributes “Accumulated changes in fair value” and “Accumulated changes in fair value due to credit risk”, although this would be the case in Finland nationally in the balance sheet statistics collection (RATI) for the ECB. No other revaluation adjustments are made to outstanding nominal amount even if they are made in RATI to the carrying amount. Outstanding nominal amount indicates the amount outstanding according to the contract, not accounting.



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In the case of a non-performing loan, any unpaid interest and other expenses and fees are added to the outstanding nominal amount.

The outstanding nominal amount on the reference date consists of the following:

- principal not yet past due under the credit contract
- principal past due under the credit contract
- any unpaid interest past due
- any separate penalty fees due to breach of contract
- other claimable expenses

The four last payments on the list together constitute the euro amount reported for the attribute “Arrears for the instrument”.

If the observed agent acquires credits from a third party, the reported outstanding nominal amount is the amount that the debtor is contractually obliged to repay, as opposed to the amount actually paid by the observed agent.

In the case of a transferred credit, outstanding nominal amount comprises the amount reported in the attribute “Transferred amount” (5.7.1). If the transferred amount is only part of the outstanding nominal amount, and the observed agent continues as the servicer, then the transferred amount is always lower than the outstanding nominal amount. In this case, the credit is reported with two creditors, and the transferred amount is the nominal amount of the external creditor.

The outstanding nominal amount for credits discounted in connection with acquisition is not for example the sum of acquired trade receivables, since the difference of the total of the receivables and the acquisition price is regarded as accrued interest. In this case, the acquisition price is reported as the nominal amount.

If the parties to a credit negotiate a change of the outstanding nominal amount, the outcome of such negotiations are reflected on the attributes of the credit, and the negotiations are described in the Accounting information record in attributes “Status of forbearance and renegotiation” and “Date of the forbearance and renegotiation status”.

The “Instrument type” and “Outstanding nominal amount” attributes in the “Instrument information record” involve for example the following relationships:

- If the credit is a revolving credit (the amount of available credit increases as funds are repaid), then the credit amount may be zero on the reference date (entire limit is reported as off-balance-sheet amount)
- If the credit is not a revolving credit and does not involve an off-balance sheet amount, then the outstanding nominal amount may not be zero in any other case than if the credit institution writes off the entire outstanding nominal amount as credit loss.

Under the Bank of Finland’s reporting model:



- Each credit exits the system reported by the observed agent, in which case credits:
 - exiting due to amortisation by the debtor are reported a final outstanding nominal amount of zero
 - exiting due to a write-off by the credit institution are recognised at an outstanding nominal amount of zero on the report closing the quarter.

5.5.5 Off-balance sheet amount

Manual Part II, Chapter 4.4.10

Definition: The attribute “Off-balance sheet amount” is used to report the value of off-balance-sheet exposures. It is the amount best describing the institution's maximum credit risk exposure without taking received protection or credit risk mitigation arrangements into account.

Mandatoriness: The attribute is not mandatory for all types of instruments.

Value: Euro amount.

If the terms of the credit contract provide that the outstanding nominal amount may increase due actions taken by the debtor or the fulfilment of criteria provided in the contract, then the off-balance sheet amount cannot be higher than zero.

If the debtor cannot increase the credit amount without concluding a new contract, no off-balance sheet amount is reported.

If the outstanding nominal amount is equal to or higher than the agreed maximum credit amount, then the off-balance sheet amount is reported as zero. The off-balance-sheet amount may never be negative.

The off-balance sheet amount is specified in the credit contract, and therefore it can be reported on the inception date. The off-balance-sheet amount may not include credit already drawn, which is reported in the outstanding nominal amount.

Credits drawn in a single instalment and not involving an off-balance-sheet amount are not reported with an off-balance-sheet amount. Similarly, circumstances where the debtor has for example customer- or instrument-limits for debtors, there may be credits with no off-balance sheet amount (see Manual Part III, Chapter 3.1).

5.6 Default information

If incapacity to repay credit is considered at the level of instrument, the default information is reported in this record. If the information is considered at the level of counterparty, it is reported in the “Counterparty risk and default record”.



5.6.1 Default status of the instrument

Manual Part II, Chapter 4.4.4

- Definition:** The attribute “Default status of the instrument” is used to report the default status of the instrument.
- Legal basis:** Regulation (EU) No 575/2013. The categories describe the circumstances in which the instrument can be considered to have defaulted in accordance with Article 178 of the Regulation.
- Value:** code list.
- Mandatoriness:** The default status of the instrument does not apply where the observed agent applies counterparty assessment instead of instrument assessment to solvency calculation. The attribute is not required from observed agents not subject to the requirements of the Capital Requirements Regulation.

The value of the Default status of the instrument may change if the state of default is prolonged. The attribute “Default status of the instrument” is directly linked to other reporting attributes.

The attribute “Cumulative recoveries since default” in the “Accounting information” record is used to report on a cumulative basis any recoveries since the beginning of default up until the period in which all past due amounts accrued during the default have been paid. When the “Date of past due for the instrument” is deducted from the reporting reference date, the result is the duration of the default in terms of days.

5.6.2 Date of the default status of the instrument

Manual Part II, Chapter 4.4.5

- Definition:** The attribute “Date of the default status of the instrument” is used to report the date on which the default, as reported in the data attribute “Default status of the instrument”, is considered to have occurred.
- Mandatoriness:** Reported if the default status of the instrument is reported.
- Value:** Date.

If the attribute “Default status of the instrument” is not reported, then the attribute “Date of the default status of the instrument” is not reported either.

The reported date of the default status of the instrument cannot be later than the reporting reference date, as it must be the same or earlier than the reporting reference date. If the attribute “Default status of the instrument” is assigned the value “Not in default” and the instrument has previously been assigned a value



indicating a state of default, then the attribute “Date of the default status of the instrument” is used to report the date when the change into “Not in default” was made.

For credits performing throughout their life, the “Date of the default status of the instrument” is the inception date.

5.6.3 Arrears for the instrument

Manual Part II, Chapter 4.4.6

Definition: The attribute “Arrears for the instrument” is used to report the aggregate amount of principal, interest and any fee payment outstanding on the reference date, which is contractually past due and has not been paid (amount past due). This amount must always be reported. If the instrument has not past due amounts on the reporting date, 0 (zero) is to be reported.

Mandatoriness: The attribute must always be reported.

Value: Euro amount.

“Arrears for the instrument” always include, in addition to past due amortisations, any fee payment outstanding on the reporting date. There is no threshold in euros for arrears to be reported.

Arrears begin to accumulate on the date on which an amount falls past due. If the credit does not involve any past due payments, the amount of arrears is reported as zero (euro). The amount of arrears for the instrument is the part of the outstanding nominal amount that has not been paid in accordance with the amortisation schedule by the reference date. Arrears comprise, in addition to unpaid amortisations of principal, accrued and capitalised interest and compensations due under the terms and conditions of the contract.

Arrears do not include accrued but uncapitalised interest, since the interest accrued from the previous contractual interest payment date until the reference date has not fallen past due.

The date on which arrears begin to accumulate is reported in the attribute “Date of past due for the instrument”.

In arrears of a few days accrue on credits reported by the observed agent for example due to technical reasons related to systems (arrears are not related to the debtor’s repayment capacity), the observed agent may use discretion regarding arrears remedied by the submission date.

All items counted as arrears are part of the nominal amount outstanding at the end of the reference period. The amount of arrears cannot exceed the outstanding nominal amount.



5.6.4 Date of past due for the instrument

Manual Part II, Chapter 4.4.7

Definition: The attribute “Date of past due for the instrument” is used to report the date on which any amount arising under the instrument became due. This is the oldest (first) such date prior to the reporting reference date and it is to be reported if the instrument has past due amounts at the reporting reference date.

Legal basis: Implementing Regulation (EU) No 680/2014. The date on which the instrument became past due in accordance with Part 2.48 of Annex V the Regulation.

Mandatoriness: Mandatory if there is an outstanding past due payment payable in accordance with the credit contract.

Value: Date.

If the credit is performing, i.e. Has the value zero reported for the attribute “Arrears for the instrument”, the attribute “Date of past due for the instrument” is not reported.

The reportable date refers to the date when arrears began to accrue. If arrears have been accruing from several dates, the first one, i.e. the oldest date is reported herein. Past due items referring to the date are unpaid on the reporting reference date.

The date of past due for the instrument cannot be in the future, which means that the reporting reference date must be more recent or the same as the date of past due. The period since the accrual of the arrears can be calculated by deducting the reporting reference date from the date of past due for the instrument.

The date of past due for the instrument refers to the date when the debtor failed to pay an instalment due in accordance with the credit contract, whereas the attribute “Date of the default status of the instrument” is used to report the date when the instrument was assigned another date than “Not in default” for the attribute “Default status of the instrument”. In practice, an instrument accrues arrears for some time before it is classified using another value than “Not in default” in the attribute “Default status of the instrument”.

5.7 Other information

Two of the other attributes stem from Template 3 of the AnaCredit Regulation (financial data) and one from Template 2 (instrument data).

5.7.1 Transferred amount

Manual Part II, Chapter 4.4.3



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Definition: The attribute “Transferred amount” is used to report the amount financial assets whose economic ownership was legally transferred.

Mandatoriness: The attribute must always be reported.

Value: Euro amount.

Transferred amount refers to the amount sold by the observed agent or transferred to another creditor through securitisation. From the perspective of the observed agent, the amount of a sold or securitised item is always positive.

In accordance with the ECB’s guidance, if the transferred amount equals the outstanding nominal amount and the observed agent does not continue to manage the credit, the transferred amount does not have to be reported. The Bank of Finland’s national attribute “Credit status”, however, repeals this guidance. In order that the entire lifecycle of the credit is described, when a credit exits the observed agent’s balance sheet (“Credit status = 2”) through sale or securitisation, the outstanding nominal amount at the time of exit is reported as the transferred amount. The transferred amount must be reported even if the credit has been drawn and reported during the same month. In these situations, the remaining nominal amount is reported as zero but the nominal amount at the transfer date is reported in the transferred amount.

If a sold or securitised credit involves a write-down, the credit will exit through quarterly reporting, and “Credit status” is assigned the value 3.

The Bank of Finland uses the attributes “Transferred amount” and “Credit status” for the calculation of different transactions.

Intra-group sales (transfers) must also be reported in the attribute “Transferred amount”. In mergers within banking groups, where contract and instrument identifiers do not change, the “Transferred amount” attribute is not reported.

Example 1.

Observed agent A grants a €100,000 credit (CON1&INST1) to counterparty B on 15 May 2020 (inception date). The credit is drawn in full on 2 June 2020 (Settlement date). On 15 July, observed agent A sells the credit to observed agent C. Since this is an intra-group transfer, the contract identifier and instrument identifier do not change. No instalments are made before the transfer. Accrued interest is reported as accumulated at the reference date.

For reference date 2020M05, observed agent A reports:

- Inception date 15 May 2020
- No Settlement date is reported
- Outstanding nominal amount €0
- Off-balance sheet item €100,000
- Credit status 1



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For reference date 2020M06, observed agent A reports:

- Inception date 15 May 2020
- Settlement date 2 June 2020
- Outstanding nominal amount €100,000
- Off-balance sheet item €0
- Credit status 1

For reference date 2020M07, observed agent A reports:

- Inception date 15 May 2020
- Settlement date 2 June 2020
- Outstanding nominal amount €0
- Off-balance sheet item €0
- Transferred amount €100,000
- Credit status 2

For reference date 2020M07, observed agent C reports:

- Inception date 15 May 2020
- Settlement date 2 June 2020
- Outstanding nominal amount €100,000
- Off-balance sheet item €0
- Credit status 1

Example 2.

Observed agent A grants a €100,000 credit (CON2&INST2) to counterparty B on 15 May 2020 (inception date). The credit is drawn in full on 2 June 2020 (Settlement date). On 15 July, observed agent A sells the credit to observed agent B. Since this is an intra-group transfer, the contract identifier and instrument identifier do not change. No instalments are made before the transfer. Accrued interest is reported as accumulated at the reference date.

For reference date 2020M05, observed agent A reports:

- Inception date 15 May 2020
- No Settlement date is reported
- Outstanding nominal amount €0
- Off-balance sheet item €100,000
- Credit status 1

For reference date 2020M06, observed agent A reports:

- Inception date 15 May 2020
- Settlement date 2 June 2020
- Outstanding nominal amount €0
- Off-balance sheet item €0
- Transferred amount €100,000
- Credit status 2

For reference date 2020M06, observed agent B reports:

- Inception date 15 May 2020



- Settlement date 2 June 2020
- Outstanding nominal amount €100,000
- Off-balance sheet item €0
- Credit status 1

5.7.2 Type of securitisation

Manual Part II, Chapter 4.4.8

Definition: The attribute “Type of securitisation” describes the type of securitisation to which the instrument has been subject.

Legal basis: Regulation (EU) No 575/2013. In accordance with Article 242(10) and (11) of the Regulation.

Mandatoriness: The attribute must always be reported.

Value: Code list

A traditional securitisation means a securitisation involving the economic

transfer of the assets and risks related to the securities being securitised from a party to another. In the case of securitised credits, the originator’s right of ownership is transferred totally or partially to a third party. Subsequently, the originator has no repayment obligation in respect of the transferred amount.

In a synthetic securitisation, the transfer of risk is achieved by the use of credit derivatives or protections, while the risk is not transferred but remains with the originator.

If the attribute “Type of securitisation” is assigned the value “Traditional securitisation”, then a non-zero value is reported in the attribute “Transferred amount”.

When the attribute “Type of securitisation” is assigned the value “Synthetic securitisation”, then

- the attribute “Balance sheet recognition” in the record “Financial data” cannot receive the value “Fully derecognised”
- the transaction has no impact on the attribute “Transferred amount”
- the credit is reported in the record “Instrument-protection record” and the attribute “Protection record” choosing an appropriate alternative for “Protection type”

If the credit is sold without securitisation, then the attribute “Type of securitisation” is assigned the value “Not securitised”.

In the context of securitisation, the attribute “Fiduciary instrument” in the “Instrument information record” does not change.



5.7.3 Fair value changes due to changes in credit risk before purchase

Manual Part II, Chapter 3.4.22

Definition: The attribute “Fair value changes due to changes in credit risk before purchase” is used to report the difference between the outstanding nominal amount and the purchase price of the instrument. This amount is reported for instruments purchased for an amount lower than the outstanding amount due to credit risk deterioration.

Mandatoriness: The attribute is conditionally mandatory, exceptions listed below.

Value: Euro amount.

The attribute is only reported if the observed agent purchases a credit from a third party and pays less for the credit on the purchase date than its outstanding nominal amount. Whether the credit is performing or non-performing on the purchase date makes no difference. The fair value change reflects the impaired value of the credit on the purchase date.

If the transaction object is a credit portfolio paid in a single instalment, then the fair value change is reported separately for each credit.

If the price paid for a purchased credit equals the outstanding nominal amount, then the attribute is not reported.

6 COUNTERPARTY-INSTRUMENT RECORD

The “Counterparty-instrument record” is used to describe the roles of the different counterparties with respect to the credit being reported. Each instrument described in the “Instrument information record” must have the relevant roles reported in the “Instrument information record”. In addition, the template describes the allocation of liability for credits with joint liability between the parties.

The key identifiers in the template are “Contract identifier”, “Instrument identifier”, “Counterparty identifier” and “Counterparty role”.

6.1 Counterparty role

Manual Part II, Chapter 6.4.1

Definition: The attribute “Counterparty role” is used to report all counterparties’ roles in relation to the instrument.

Mandatoriness: The attribute must always be reported.

Value: code list.



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Every credit always involves at least three roles. These are the “Creditor”, “Debtor” and “Servicer”. In addition, in the context of securitisation, an “Originator” is reported.

Creditor means the counterparty bearing the credit risk of an instrument.

Debtor means the counterparty which has the unconditional and primary obligation to make repayments arising under the contract.

Servicer means the counterparty administering the contract. Usually, it is the creditor, but in the context of sale or transfer, it may also be someone else. The observed agent always acts at least as the creditor or servicer.

In the context of securitisation, originator is the one converting the liabilities into securities. An originator must be reported if the value reported for “Type of securitisation” in the “Instrument information record” is either “Traditional securitisation” or “Synthetic securitisation”.

All parties indicated in the “Counterparty-instrument record” must be described in the “Counterparty reference record”.

Similarly, each instrument described in the “Instrument information record” must have the relevant roles reported in the “Counterparty-instrument record”.

If a credit involves several creditors, the credit is reported one in the “Instrument information record”. All creditors related to the credit are then reported in the “Counterparty-instrument record” (partly securitised credits).

If a credit involves several debtors, the credit is reported one in the “Instrument information record”. All debtors related to the credit are then reported in the “Counterparty-instrument record”.

Where the debtor is a natural person, the data are not reported in the “Counterparty-instrument record”.

The credit data reporting does not include the role “guarantor”. A guarantee is treated as a protection. The role of the guarantor is not reported in the “Counterparty-instrument record” but as a protection. If a part or the whole of the credit falls payable by the guarantor, the guarantor may become a counterparty in the role of a debtor.

6.2 Joint liability amount

Manual Part II, Chapter 7.4.1

Definition: “Joint liability amount” is used to report the outstanding nominal amount for which each debtor is liable in relation to a single instrument. If a natural person is responsible for the credit their data are not reported.



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Mandatoriness: If there is only a single debtor for a credit, no joint liability amount is reported. If a credit has several debtors which are not natural persons, the amount of joint liabilities must be reported.

Value: Euro amount.

The joint liability amount reported for each debtor cannot exceed the outstanding nominal amount.

The sum of individual joint liability amounts, where none of the debtors is a natural person exceeds or is equal to the outstanding nominal amount.

If the credit has several jointly liable debtors, then the sum of reported joint liability amounts may be less than the outstanding nominal amount, if some of the liabilities are excluded from the reporting on account of a debtor being a natural person.

7 PROTECTION RECORD

The “Protection record” is used to describe the basic information on the instrument used as protection for the repayment of the credit. The protection does not necessarily target an individual credit (combination of contract and instrument identifiers), but the protection agreement may be more general in nature, covering all of the debtor's credits or solely credits established on the basis of a contract (contract identifier alone) between the debtor and the observed agent. The basic data on the protection are only described once, even if the protection covers several credit instrument. Where a protection is not related to any credits reported in the credit data reporting, it is not reported.

Regulation (EU) No 575/2013, Article 4(1)(59) provides as follows: “unfunded credit protection” means a technique of credit risk mitigation where the reduction of the credit risk on the exposure of an institution derives from the obligation of a third party to pay an amount in the event of the default of the borrower or the occurrence of other specified credit events. In cases referred to in the Article (guarantee), the attributes “Probability of default” and “Default status of the counterparty” are reported in the “Counterparty risk and default record” for the protection provider.

Regulation (EU) No 680/2014 (technical implementation of capital requirements), Article 58: “Financial guarantees” are contracts that require the issuer to make specified payments to reimburse the holder of a loss it incurs, because a specified debtor fails to make payment when due in accordance with the original or modified terms of a debt instrument. The following items of Annex I of the CRR shall be classified as “financial guarantees”:

- “Guarantees having the character of credit substitute”,
- “Credit derivatives” that meet the definition of financial guarantee,
- “Irrevocable standby letters of credit having the character of credit substitutes”.



In practice, the above guideline means that when a guarantee is reported in the “Protection record” in credit data reporting, the attribute “Protection type” is either assigned the value “Financial guarantees other than credit derivatives” or “Credit derivatives”, if the guarantee is consistent with the definition of a financial guarantee.

Credit data reporting does not take a stance on so-called embedded protection instruments. The protection instruments embedded in the structure (e.g. securities) as such are individual (reportable) protection instruments, but the observed agent may apply its own practices in how to structure them. A protection structure consisting of several securities is reported as a single protection instrument, and the protection value is the sum of the values, based on the assessment method, of the individual securities embedded in it.

Where a reporting agent is responsible for reporting on behalf of several observed agents, and if a single protection is used as protection for credits extended by several observed agents, then the reporting agent uses the same “Protection identifier” in connection with each observed agent’s protections.

Example 1: A single protection instrument covering several credits

- Observed agent (OA#1) extends on 17/09/2018 to debtor (CPY#A) a credit of €300,000 (CON#1 & INT#1). The protection for the credit is a commercial real estate collateral (CRE#1), and the value assigned to the protection is €500,000.
- The commercial real estate is solely owned by the debtor. The attribute “Protection valuation approach” was assigned the value “Third-party valuation” and the attribute “Protection value type” the value “Market value”. The attribute “Protection value” was reported as €1,000,000.
- According to the land registry excerpt, a lien of €150,000 was granted to a third party.

As at the reference date 2018M09, the protection was reported as follows:

- “Protection provider identifier” = CPY#A (in the Protection provider record)
- “Protection identifier” = CRE#1 (in the Protection data record)
- “Protection value” = €1,000,000 (in the Protection data record)
- “Protection type” = Commercial real estate collateral

Although the lien does not affect the protection value in the “Protection data” record, the “Instrument-protection record” reports “Third party priority claims against the protection” = €150,000.

7.1 Type of protection

Manual Part II, Chapter 9.4.3

Definition: The attribute “Type of protection” is used to report the type of protection received, irrespective of its eligibility for credit risk



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mitigation. The eligibility referred to in the definition regards the eligibility of the protection in accordance with the CRR.

Mandatoriness: The attribute must always be reported.

Value: code list.

In credit data reporting, the concept of protection is extensive, without preconditions as to which instruments may be used as credit protection. A more broad variety of protections is approved in credit data reporting as opposed to for example Finrep or Corep reporting. The attribute “Protection type” intentionally comprises a broad range of different protection instruments in order to be able to report the protection accepted for a credit.

When the attribute “Type of instrument” in the “Instrument information record” is assigned the value “Reverse repurchase agreements”, the type of protection depends on the type of securities concerned, i.e. bonds, shares or investment fund shares/units.

Three of the types of protection are related to real estate. Residential real estate refers to a residence which is occupied by the owner or the lessee of the residence, including the right to inhabit an apartment in a housing cooperative. Where reference in these instructions is made to real estate or residential or commercial immovable property or a mortgage on such property, it shall include shares in Finnish residential housing companies operating in accordance with the Finnish Housing Company Act of 1991 or subsequent equivalent legislation. Shares in housing companies are reported as real estate collateral instead of securities.

The other values related to real estate are:

- “Offices and commercial premises”
 - assessment of the debtor’s creditworthiness does not reflect the income from the real estate
- “Commercial real estate collateral”
 - assessment of the debtor’s creditworthiness reflects the income from the real estate

When the attribute “Type of instrument” in the “Instrument information record” is assigned the value “Financial leases”, then the protection for the credit consists of the leased assets.

Example 1: Protection in the context of a financial lease

Observed agent (LESSOR#1) extends credit (INST#1) as part of contract (CNT#FL) to debtor (LESSEE#A).

- the lessee (LESSEE#1) needs financing to procure production equipment
- the lessor (LESSOR#1) purchases the requisite equipment
- the lessee uses the equipment for an agreed lease period and pays a regular operating fee



- the operating fee paid during the lease period covers a large proportion of the procurement cost, and as an additional source of return, the credit bears interest
- the lessee has the option to buy the equipment at the end of the lease period

The financial lease for the credit protection is reported in 2019M04 as follows:
Values in the “Instrument information” record:

- “Contract identifier” = CNT#FL
- “Instrument identifier” = INST#1
- “Instrument type” = Financial leasing

Identifiers in the “Instrument-protection received data” record:

- “Contract identifier” = CNT#FL
- “Instrument identifier” = INST#1
- “Protection identifier” = PROT#1

Values reported in the “Instrument-protection received data” record:

- “Protection identifier” = PROT#1
- “Protection type” = Other physical collaterals [equipment needed]

Values reported in the “Protection provider” record:

- “Protection identifier” = PROT#1
- “Protection provider identifier” = LESSOR#1 [equipment owner]

7.2 Maturity date of the protection

Manual Part II, Chapter 9.4.2

Definition: The attribute “Maturity date of the protection” is used to report the contractual maturity date of the protection, which is the earliest date at which the protection may terminate or be terminated, taking into account any agreements amending initial contracts.

Mandatoriness: The attribute is conditionally mandatory, exceptions listed below.

Value: Date.

The maturity date of the protection is not a property of the received protection item itself but of its function as protection securing a reported credit. If the protection is used to secure multiple instruments, the reported maturity date of the protection is the one maturing first. After this date has passed, the “maturity date of protection” is rolled over to the next such date

The attribute “Maturity date of the protection” is not reported if



- the credit contract expressly specifies that the protection is legally binding for an unlimited period of time (until further notice or otherwise agreed)
- no specific maturity date of the protection is provided in the credit contract

7.3 Protection value

Manual Part II, Chapter 9.4.4

Definition: The attribute “Protection value” is used to report the amount of the protection value at the latest valuation date prior to the reporting reference date.

Mandatoriness: The attribute must always be reported.

Value: Euro amount.

A single value is reported for each protection. Protection value is reported without considering any regulatory haircuts (such as risk weights required by the Regulation). The value reported for a protection identifier is the value confirmed in the most recent valuation carried out prior to the reporting reference date.

This applies to both separate protection instruments as well as bundled protection, consisting for example of a basket of securities.

7.4 Date of protection value

Manual Part II, Chapter 9.4.8

Definition: The attribute “Date of protection value” is used to report the the date on which the latest appraisal or valuation of the protection was carried out prior to the reporting reference date.

Mandatoriness: The attribute must always be reported.

Value: Date.

If the attribute “Type of protection value” is assigned the value “Notional amount” and the attribute “Type of protection” is assigned the value “Financial guarantees other than credit derivatives”, the date of protection value is the same than reference date.

If the attribute “Type of protection value” is assigned the value “Notional amount” and the currency of the value is other than euro, the date of protection value is the same than reference date.

If the attribute “Type of protection value” is assigned the value “Notional amount” and the currency of the value is euro and the attribute “Type of protection” is assigned the value “Financial guarantees other than credit derivatives”,



the date of the attribute refers to the date on which the latest valuation was carried out prior to the reporting reference date.

If the attribute “Type of protection value” is assigned any other value than “Notional amount” the date of the attribute refers to the date on which the latest valuation was carried out prior to the reporting reference date.

7.5 Type of protection value

Manual Part II, Chapter 9.4.5

Definition: The attribute “Type of protection value” is used to define the valuation approach whereby “Protection value” was determined.

Mandatoriness: The attribute must always be reported.

Value: code list.

**Table 3. Indicative connection of protection type and protection value type**

Protection type	Protection value type
Gold	Fair value
Currency and deposits	Notional amount
Securities	Notional amount
Loans	Notional amount
Equity and investment fund shares or units	Fair value
Credit derivatives	Notional amount
Financial guarantees other than credit derivatives	Notional amount
Trade receivables	Notional amount
Life insurance policies pledged	Notional amount
Residential real estate collateral	Market value/long-term sustainable value
Office and retail properties	Market value/long-term sustainable value
Commercial real estate collateral	Market value/long-term sustainable value
Other physical collaterals	Fair value
Other protection	Notional amount/fair value

7.6 Protection valuation approach

Manual Part II, Chapter 9.4.6

Definition: The attribute “Protection valuation approach” is used to report the method whereby the protection value was determined.

Mandatoriness: The attribute must always be reported.

Value: code list.

The attributes “Type of protection value” and “Protection valuation approach” are closely interlinked, and together they affect the euro value of the protection. If the attribute “Type of protection value” is “Notional amount”, there is no actual valuation approach and the attribute is reported as value “Other type of valuation”.

If the attribute “Type of protection value” other than “Notational amount”, there are four different types of valuation approaches:

- mark-to-market valuation (price of an identical instrument in an active market)
 - for example gold, listed shares, securities and investment fund shares
- counterparty estimation (price determined by the protection provider)
 - unlisted shares and shares in private equity funds
- creditor valuation (valuation is performed by a credit institution employee with the necessary experience to execute a valuation but who is not independent of the credit decision process)



- unlisted shares, estimates derived on the basis of the market values of other instruments, various types of real estate collateral
- third-party valuation (valuation is
 - unlisted shares valued at their fair value, leased assets, values of various types of real estate collateral

provided by an appraiser who is independent of the credit decision process by a methodology which is not controlled by the creditor)

No hierarchy is established for the different valuation approaches for the purposes of credit data reporting.

7.7 Original protection value

Manual Part II, Chapter 9.4.9

Definition: The attribute “Original protection value” is used to report the protection's fair value at the date when it was originally received as a credit protection.

Mandatoriness: The attribute is mandatory for protection items securing credits originated on or after 1 September 2018.

Value: euro amount.

In the case of a protection item securing the same instrument throughout its life, the original protection value will remain unchanged over time. The same applies to cases where the same protection is used to concurrently secure other credits originated later than the first one.

The original protection value does not change over time and the protection value is not updated due to changes in foreign exchange rates.

7.8 Date of original protection value

Manual Part II, Chapter 9.4.10

Definition: The attribute “Date of original protection value” is used to report the date of original protection value, i.e. the date on which the latest appraisal or valuation of the protection was carried out prior to its initial receipt as credit protection.

Mandatoriness: The attribute is mandatory for protection items securing credits originated on or after 1 September 2018.

Value: Date.

The attribute is linked to the above attribute “Original protection value”.



7.9 Real estate collateral location

Manual Part II, Chapter 9.4.7

Definition: The attribute “Real estate collateral location” is used to report the region or the country where the real estate collateral is located.

Mandatoriness: The attribute is reported for different types of real estate collateral.

Value: Code list (NUTS3 and ISO country list)

Real estate collateral types concerned by the reporting of the attribute are:

- Residential real estate
- Offices and commercial premises
- Commercial real estate

If the attribute “Protection type” is assigned another value than real estate collateral, then the attribute is not reported.

Reporting until 28 February 2021:

The level of detail in the reporting of the type of real estate collateral depends on the country of location of the real estate. If the property is located in:

- an AnaCredit country, the attribute is assigned one of the NUTS3 values
- a non-AnaCredit country, then a country code (ISO 3166) is reported in the attribute

In the credit data reporting, the regional allocation is made by the ECB on a centralised basis on by reference to the postal codes of the AnaCredit countries. Therefore, observed agents may report either a NUTS3 value or a postal code.

Observed agents have two alternatives (AnaCredit country):

- ISO 3166 country code + dash + postal code
- NUTS3 value
- If neither is available, the country code is reported in the attribute.

Applicable as of the reporting date 31 March 2021:

Only NUTS3 area codes of real estate collateral located in an AnaCredit country may be reported with this attribute.

- The field is voluntary for domestic locations.
- If the location is in another AnaCredit country, either of the following or both must be reported: NUTS3 area code and/or postal code.
- The attribute is not used for locations outside the AnaCredit area.



7.10 Real estate collateral country

Definition:	“Real estate collateral location country” is the country in which the collateral is located. The field is a national extension.
Mandatoriness:	(until 28 February 2021): The attribute must be reported if the attribute “Collateral location” is not reported. (as of 31 March 2021): The attribute is mandatory.
Value:	Code list.

7.11 Real estate collateral postal code

Definition:	The attribute “Real estate collateral postal code” is used to report the postal code in which the collateral is located. The field is a national extension.
Mandatoriness:	(until 28 February 2021): The attribute must be reported if the attributes “Real estate collateral location” and “Real estate collateral location city” are not reported and the real estate collateral is located in an AnaCredit country. Mandatoriness (as of 31 March 2021): The field is Mandatory for domestic locations. The field is voluntary for locations in other AnaCredit countries if NUTS3 area code is reported in the field “Real estate collateral location”. The field is voluntary for locations outside the AnaCredit area.
Value:	Postal code.

7.12 Real estate collateral city

Definition:	The attribute “Real estate collateral location city” is used to report the city in which the real estate collateral is located. The field is a national extension.
Mandatoriness:	(until 28 February 2021): The attribute is mandatory to report if the attributes “Real estate collateral location” and “Postal code of the real estate collateral location” are not reported and the real estate collateral is located in an AnaCredit country. (as of 31 March 2021): The attribute is voluntary.
Value:	City/town

8 INSTRUMENT-PROTECTION RECORD

The “Instrument-protection record” indicates the relationship between an instrument and protection. If the protection is reported in the “Protection record”, then the protection must be linked to at least one instrument in the “Instrument-



protection record”. If there is a protection linked to a credit, it is indicated in the “Instrument-protection record”.

The key identifiers of the record are “Contract identifier”, “Instrument identifier” and “Protection identifier”.

8.1 Protection allocated value

Manual Part II, Chapter 8.4.1

Definition: The attribute “Protection allocated value” is used to report the maximum amount of the protection value that can be considered as credit protection for the instrument. The amount of the existing third parties or observed agent priority claims against the protection must be excluded in the protection allocated value.

Mandatoriness: The attribute must always be reported.

Value: Euro amount.

In determining the value assigned to a protection, the observed agent complies with the principles used by it internally in risk management. Although the AnaCredit Regulation first makes reference to assignment in line with Finrep, here the Manual and Regulation differ from each other. Credit data reporting does not have any guidance related to the reporting of the allocation of protections, which means there is no direct link to Finrep or Corep allocation.

More versatile types of protection are accepted in credit data reporting than allowed by the CRR. If a credit has more than one protection instruments, they do not have to be prioritised.

If a protection is not assigned to a credit but a creditor, then it covers all of the creditor's credits. If a protection is assigned by the credit contract to several credits drawn on the basis of several instrument identifiers, the protection is assigned to all of these instruments. In these cases, all of the instruments are linked to the protection using the key identifiers in the “Instrument-protection record”.

The use of a protection instrument in connection with an individual credit reduces the value available for other protections based on the same instrument. If a protection instrument can be used as a credit protection, it is reported using the key identifiers even if the available amount is zero.

As a rule, there are two types of values allocated to a protection:

- protection value is directly the nominal amount of the protection
- more advanced valuation approaches, where the nominal value is linked to other factors affecting the value of the protection

Example 1: Several protection instruments protecting several credits



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Supervised credit institution subject to capital requirements (OA#1) has extended to a debtor (DEB#X) on the basis of a contract (CON#1) three credits (INST#1, INST#2 ja INST#3). The outstanding nominal amount of each of these credits on the reference date 2019M09 is €10,000,000.

The debtor (DEB#2) and therefore all of the credits are covered by two protections:

- The value of protection (PROT#1) is €15,000,000
- The value of protection (PROT#2) is €3,000,000

The observed agent's (OA#1) internal risk management approach only approves a maximum of €18,000,000 as protection for the debtor's (DEB#X) credits. The observed agent allocates the protection internally as follows:

- PROT#1: to credit (CON#1 & INST#1) 10 000 000 €
- PROT#1: to credit (CON#1 & INST#2) 5 000 000 €
- PROT#2: to credit (CON#1 & INST#2) 3 000 000 €

In order to comply with the minimum capital requirements, the observed agent cuts 50% of the value of both of the protection instruments, and then the values of the protections (in line with the minimum capital requirements) are cut in half (PROT#1: €7,500,000 and PROT#2: €1,500,000).

The protection value reported in the credit data reporting is based on the value approved by the observed agent's internal risk management instead of the value in accordance with the CRR (cutting values in half). The protection is assigned to all protection objects, including the credit CON#1 & INST#3, since the protection covers all of the debtor's (DEB#X) credits.

The record "Instrument-protection record" as at 2019M09

- CON#1 & INST#1: PROT#1: 10 000 000 €
- CON#1 & INST#1: PROT#2: 0 €
- CON#1 & INST#2: PROT#1: 5 000 000 €
- CON#1 & INST#2: PROT#2: 3 000 000 €
- CON#1 & INST#3: PROT#1: 0 €
- CON#1 & INST#3: PROT#2: 0 €

Example 2: Impact of a priority claim on value assigned to a protection.

- An observed agent (OA#1) has extended to a debtor (DEB#X) a credit of €1,000,000 for the purchase of a residential real estate (RRE#1).
- The debtor submits to the observed agent a report on the liens on a property, according to which €1,200,000 of the €2,000,000 the value of the real estate remains unpledged (collateral value available).

The identifiers of the credit (CON#1 & INST#1) and protection (RRE#1) are reported in the key identifiers of the "Instrument-protection record". The attribute "Protection value" in the "Protection record" is assigned the value



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€2,000,000. The protection is the only protection for the credit. However, the observed agent must consider all factors related to the protection in assigning the value of the protection for the credit. At the maximum, this value may be €1,200,000. If the debtor winds up in payment difficulties and subsequently a bankruptcy, then in the context of the sale of protection, the observed agent may receive this amount from the bankruptcy estate.

The value assigned to a credit protection depends on:

- the amount of priority claims
- liquidity of protection (ease of selling the protection)
- quality of protection (how to assess the true protection by trade receivables, when the default risk of instruments in a credit portfolio is difficult to assess)
- quality of securities used as protection (for example bonds issued by a non-financial corporation)

8.2 Third party priority claims against the protection

Manual Part II, Chapter 8.4.1

Definition: The attribute “Third party priority claims against the protection” is used to report the maximum amount of any existing higher ranked liens with respect to third parties other than the observed agent against the protection.

Mandatoriness: The attribute must always be reported.

Value: Euro amount.

The total amount of third party priority claims, whose liens rank higher with respect to the observed agent. Priority claims (credits) are not reported for the observed agent, since they are not credits under the reporting agent’s reporting obligation.

Priority claims are usually known in the context of inception of a credit contract. The attribute may not be updated regularly, but only in the context of the exit of the claim to which a priority claim is related. If the observed agent has an attribute under continuous monitoring, the data may be updated more frequently.

Example 1: Credit and priority

The example is reviewed from the perspective of the observed agent OA#.

- In 2016M08, observed agent OA#1 extends a credit of €100,000 (CON#1 & INST#1) to debtor CPY#A, and observed agent OA#1 has contractually the highest priority in relation to the protection (priority no 1). Protection for the credit consists of commercial real estate CRE#1, whose market value is €950,000 and value assigned to the protection €400,000.



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- In 2017M06, observed agent OA#1 extends a credit of €150,000 (CON#2 & INST#2) to debtor CPY#A, and observed agent OA#1 has contractually the second-highest priority in relation to the protection (priority no 2). Protection for the credit consists of commercial real estate CRE#1, whose market value is €950,000 and value assigned to the protection € 300,000.
- In 2018M09, observed agent OA#1 extends a credit of € 500,000 (CON#1 & INST#3) to debtor CPY#A, and observed agent OA#1 has contractually the third-highest priority in relation to the protection (priority no 3). Protection for the credit consists of commercial real estate CRE#1, whose market value is €1,000,000 and value assigned to the protection €500,000.
- At the end of 2018M09, the nominal amount of the observed agent's credit INST#1 is €100,000 and the nominal amount of credit INST#3 is €500,000. The commercial real estate is owned by debtor DPY#A. Observed agent OA#1 does not know how much the nominal amount of debtor CPY#A's credit INST#2 is at the time.

The commercial real estate in the "Protection record" as at 2018M09:

- "Protection identifier" = CRE#1
- protection value = €1,000,000
- protection type = 10 (Commercial real estate collateral)

Observed agent OA#1 allocates the protection to its credits INST#1 and INST#3 as follows:

- The market value of protection CRE#1 is €1,000,000 and
- with the first priority, it allocates €400,000 as follows:
 - INST#1: € 100,000
 - INST#3: EUR 300,000
- As regards the remaining market value of €600,000, observed agent OA# deducts €300,000 (observed agent OA#2's priority no 2) and allocates €300,000 of the remaining €300,000 to credit INST#3.

Commercial real estate in the "Instrument-protection received data" record 2018M09:

- "Protection identifier" = CRE#1
- INST#1: value assigned to the protection = €100,000
- INST#1: third-party priority claims = €0
- INST#3: value assigned to the protection = € 500,000
- INST#3: third-party priority claims = €300,000

In the example, observed agent OA#1 has two priorities, and a third party OA#2 has priority no 2. Third-party priority claims include all claims ranking higher than the claims related to observed agent OA#1. In the calculation, no specific priority claims (no 1) have been calculated for credit INST#3 on third-party claims (only no 2: €300,000).

The data in the "Instrument-protection record" indicate that if debtor CPY#1 were to go bankrupt and the loans still had their original nominal value, then creditor OA#2 would not face credit losses, if €550,000 are recovered from the commercial real estate. In this case, observed agent OA#1 would recognise a



credit loss of €200,000, since on the basis of priority no 1, €300,000 of credit related to priority no3 would also be recovered.

8.3 General collateral

Definition: The attribute “General collateral” is used to report whether the protection is a general collateral. General collateral is not explicitly assigned to specific loan instruments. The field is a national extension.

Mandatoriness: The attribute must always be reported.

Value: code list.

A general collateral means a contract-based protection where the creditor may freely transfer the protection between a debtor's different credits. A general collateral is not contractually assigned to an individual credit or several credits, and it may in some cases be used to protect other credits extended to the same consolidation group.

The observed agent divides (allocates) the protection to individual credits in accordance with its own internal practice. In the “Instrument-protection record”, all credits covered by a general collateral are reported by key identifiers. In the record, all such credits are reported that may be protected by the general collateral, regardless of whether any protection was being used on the reference date on the credit concerned.

9 PROTECTION PROVIDER RECORD

The “Protection provider record” was added to the national implementation on the ECB’s request. The ECB found that, under the initial wording of the AnaCredit Regulation, a protection identifier could only be related to a single “Protection provider identifier”. However, it is possible that more than one protection providers are related to a protection identifier.

The key identifier of the “Protection provider record” consists of the “Protection identifier” and “Protection provider identifier” (“Counterparty identifier” of the protection provider).

9.1 Protection provider identifier

Manual Part II, Chapter 9.4.1

Definition: The attribute “Protection provider identifier” is used to report the “Counterparty identifier” of the protection provider.

Mandatoriness: The attribute must always be reported.

Value: “Counterparty identifier” applied by the reporting agent.



The attribute is used to report the protection provider identifier. The protection provider is not reported as a role in the “Counterparty-instrument record”.

If the protection provider is a natural person, the personal identification code is not reported. Where the protection provider is a natural person, the value “NP” is reported for the attribute “Protection provider identifier”. Where a single protection involves more than one natural persons as protection providers, the value “NP” is reported for the protection only once, and the natural persons are not differentiated.

9.2 Protection provider type

Definition: The attribute is used to report the “Protection provider type” in order to be able to report the primary protection provider to the ECB. For the time being, only a single protection provider (which should be the primary protection provider) can be reported to the ECB. The attribute is a national addition.

Mandatoriness: The attribute must always be reported.

Value: code list.

The attribute is also used to report whether the protection provider is a natural person. In this case, the counterparty data is neither reported in the “Counterparty reference record” nor in the “Counterparty risk and default record”.

If the counterparty is a natural person, the “Protection provider type” attribute is always assigned the value ‘3’ Natural person.

Each protection may only have one primary protection provider. Other protection providers are reported as other protection providers. If the protection provider is a natural person, Protection provider type cannot have the value ‘1’ Primary protection provider (non-natural person) or ‘2’ Other protection provider (non-natural person).

If a credit has two protection providers, a natural person and a non-natural person, the non-natural person is always chosen as the primary protection provider regardless of how the protection is actually divided amongst them.



10 COUNTERPARTY RISK AND DEFAULT RECORD

The “Counterparty risk and default record” links two tables under the ECB Regulation, no 9 (counterparty risk data) and no 10 (counterparty default data). These are used to report risk and default data related to the counterparty. The data are only reported on debtors and protection providers, where the protection provider functions as a guarantor as defined below. No data on natural persons are reported.

Regulation (EU) No 575/2013, Article 4(1)(59) provides as follows: “unfunded credit protection” means a technique of credit risk mitigation where the reduction of the credit risk on the exposure of an institution derives from the obligation of a third party to pay an amount in the event of the default of the borrower or the occurrence of other specified credit events. In cases referred to in the Article (guarantee), the attributes “Probability of default” and “Default status of the counterparty” are reported in the “Counterparty risk data” for the protection provider.

The key identifier of the record is “Counterparty identifier”.

10.1 Default status of the counterparty

Manual Part II, Chapter 10.4.1

Definition: The attribute “Default status of the counterparty” is used to identify the default status of the counterparty and describe the motives for which the counterparty can be in default.

Mandatoriness: The attribute is conditionally mandatory, exceptions listed below.

Value: code list.

The default status of the counterparty identified in the field is defined at the level of a counterparty.

If the definition is made at the level of an instrument and reported in the “Instrument information record” the default status of the counterparty is not reported.

10.2 Date of the default status of the counterparty

Manual Part II, Chapter 10.4.2

Definition: The attribute “Date of the default status” is used to report the date on which the default status reported in the “Default status of the counterparty” is considered to have arisen.

Mandatoriness: The attribute is mandatory if the attribute “Default status of the counterparty” is reported.

Value: Date.



If the counterparty has never defaulted, no date is reported.

10.3 Probability of default

Manual Part II, Chapter 11.4.1

Definition: The attribute “Probability of default” of the counterparty is used to report the probability of default of the counterparty as established in accordance with the Internal Ratings Based (IRB) method. The probability of default is reported on a through the cycle (TTC) perspective.

Mandatoriness: The attribute is conditionally mandatory.

Value: Numeric (between 0 and 1, with a maximum of six decimals)

If the observed agent calculates the probability of default at the instrument level, then the probability of default of the counterparty is the weighted average calculated on the basis of instruments reported in the credit data collection.

If the PD calculation by the observed agent gives more than one results, the highest is reported in accordance with the prudence principle.

PD ratios calculated by other methods than the IRB are not reported in the credit data collection.

11 ACCOUNTING INFORMATION RECORD

The “Accounting information record” is used to describe the treatment of the instrument in financial statements under the applicable accounting standards.

If the credit is not included in the observed agent’s assets, the accounting information attributes are not reported. Credits that are fully derecognised but serviced by the observed agent have a special status.

The financial statements are based on the “Accounting standard” reported in the “Counterparty reference record”. If the credit is partially transferred, then only the part of the credit recognised by the observed agent in its balance sheet is reported in the accounting data.

The “Accounting information” record is reported on a quarterly basis, and the key identifiers of the record are “Contract identifier” and “Instrument identifier”.

11.1 Accounting classification of instruments

Manual Part II, Chapter 5.4.1

Definition: The attribute “Accounting classification of instruments” is used to report the accounting portfolio where the credit is



recorded in accordance with the accounting standard – IFRS or national GAAP – applied by the observed agent’s legal entity.

Legal basis: Regulation (EU) No 2015/534 (ECB/2013/13).

Mandatoriness: The attribute must always be reported.

Value: code list.

If the credit is not included in the observed agent’s assets, the classification is not reported. The classification of the credit in accounting has a direct impact on the attributes “Accumulated impairment amount”, “Accumulated changes in fair value due to credit risk” and “Prudential portfolio”.

The classes used by the observed agent for the attribute “Accounting classification of instruments” must correspond with the attribute “Accounting standard” reported for the observed agent in Table 1 “Counterparty reference record”.

Table 4. Connection of instrument classification to certain attributes

Accounting classification of instruments	Impairment	Accumulated changes in fair value due to credit risk	Prudential portfolio
IFRS accounting portfolios			
Cash balances at central banks and other demand deposits	Possible	Possible	Non-trading book
Financial assets held form trading		Possible	Trading book
Non-trading financial assets mandatorily at fair value through profit or loss		Possible	Non-trading book
Financial assets designated at fair value through profit or loss		Possible	Non-trading book
Financial assets at fair value through other comprehensive income	Possible		Non-trading book
Financial assets at amortised cost	Possible		Non-trading book
National GAAP accounting portfolios			
Cash balances at central banks	Possible	Possible	Non-trading book
Financial assets held form trading		Possible	Trading book
Non-trading financial assets mandatorily at		Possible	Non-trading book



fair value through profit or loss			
Non-trading non-derivative financial assets measured at fair value through profit or loss	Possible	Possible	Non-trading book
Non-trading debt instruments measured at a cost-based method	Possible		Non-trading book
Other Non-trading Non-derivative Financial assets	Possible		Non-trading book

11.2 Balance sheet recognition

Manual Part II, Chapter 5.4.2

Definition: The attribute “Balance sheet recognition” is used to report to which extent the credit is recognised on the balance sheet by the observed agent.

Legal basis: Annex III and Template 15 of Annex IV to the ITS.

Mandatoriness: The attribute must always be reported.

Value: code list.

If the credit is recognised in the observed agent's accounts, then it is included in the assets on the balance sheet. In this case, the credit is included in full or to the extent that the observed agent still participates in it.

The observed agent may take a stand on the credit and its balance sheet recognition even where it is not the creditor. According to some national accounting practices, a fiduciary credit may be part of the observed agent's balance sheet even if the economic owner of the credit is someone else than the observed agent.

The code list value “Fully derecognised” does not mean that the credit has been recognised on the balance sheet at some point in time, but it may have been recognised on the balance sheet previously.

There are some common principles regarding the balance sheet recognition of credits:

- Write-off of the full credit amount leads to the full derecognition of the credit.



- After a partial write-down, the remaining proportion of the credit is reported as fully recognised on the balance sheet.
- Credits associated with traditional securitisation or otherwise fully transferred off the balance sheet are reported as fully derecognised.
- Credits associated with synthetic securitisation are reported as fully recognised on the balance sheet.
- If the credit is a fiduciary credit, then the observed agent only records it on the balance sheet if required by the national accounting model.

11.3 Accumulated write-offs

Manual Part II, Chapter 5.4.4

Definition: The attribute “Accumulated write-offs” is used to report the cumulative amount of principal and past due interest of any debt instrument that the institution is no longer recognising because they are considered uncollectible, independently of the portfolio in which they were included. Write-offs could be caused both by reductions in the carrying amount of financial assets recognised directly in profit or loss and by reductions in the amounts of the allowance accounts for credit losses set off against the carrying amount of financial assets.

Mandatoriness: The attribute is mandatory for all other credits than fully derecognised credits still administered by the observed agent.

Value: Euro amount (without sign).

If no write-offs are made between the “Inception date” and “Reference date”, then the value zero is reported for the attribute.

If the credit continues to be reported after the write-off recognition and the debtor amortises more than the outstanding nominal amount, then the amount of accumulated write-offs is reduced accordingly.

If the write-off is assigned instead of the credit to the debtor, then it is divided between the debtor’s credits.

A credit fully derecognised due to write-offs continues to be reported until the period ending the quarter (see instructions on exiting credits in Section 12). After the exit, the credit is no longer reported on. Hence, any recoveries received after the exit are not reported in the credit data reporting.

Accumulated write-offs is a cumulative field, and it includes all write-offs made during the life of the credit. Cumulation in the field is not reset to zero when the financial period changes.

11.4 Accumulated impairment amount

Manual Part II, Chapter 5.4.5



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Definition: The attribute “Accumulated impairment amount” is used to report the amount of loss allowances that are held against or are allocated to the instrument on the reporting reference date.

Mandatoriness: The attribute is conditionally mandatory, exceptions listed below.

Value: Euro amount (without sign).

Under the IFRS standards, accumulated impairment relates to the following amounts:

- ii) loss allowance at an amount equal to 12-month expected credit losses;
- ii) loss allowance at an amount equal to lifetime expected credit losses;

Under GAAP, the accumulated impairment relates to the following amounts:

- i) loss allowance at an amount equal to general allowances;
- ii) loss allowance at an amount equal to specific allowances;

The attribute is mandatory if the instrument is allocated in financial statements to a portfolio subject to impairment. If the relevant financial statement classification does not recognise impairment, the attribute is not reported (see table in section 11.1 Accounting classification of instruments).

If the attribute “Type of impairment” is assigned the value “Not subject to impairment or Non-applicable”, then the attribute is not reported.

The attribute is not reported if the credit is still serviced by the observed agent but fully derecognised.

When the attribute “Accumulated impairment amount” is reported, the attributes “Type of impairment” and “Impairment assessment method” indicate the method used to calculate the impairment.

If the attribute “Impairment assessment method” is assigned the value “General allowances”, the impairment amount assessed for a group of credits must be allocated to the individual credits in the group.

The attributes "Accumulated impairment amount" and "Accumulated changes in fair value due to credit risk" are not reported for the credit at the same time.

Example 1: Accumulated impairment amount

Observed agent C purchases a €100,000 single-instalment credit (CON#1 & INST#1), and recognises a €10,000 change in fair value due to credit risk in connection with the purchase. In reporting the period 2018M09, the observed agent enters a €10,000 recognition in the accumulated impairment amount eliminating credit risk. After the entry, the carrying amount of the credit is €90,000.



In the period 2018M12, the outstanding nominal amount of the credit is still €100,000, but the observed agent has made a further €20,000 provision in the carrying amount.

The observed agent complies with the IFRS in its accounting and the credit is carried at amortised cost, i.e. it is subject to impairments.

As at the reference date 2018M09 and 2018M12:

- outstanding nominal amount = €100,000
- fair value changes due to changes in credit risk before purchase = €10,000

As at the reference date 2018M09:

- accumulated impairment amount = €10,000
- accumulated changes in fair value due to credit risk = not reported
- carrying amount = €90,000

As at the reference date 2018M12:

- accumulated impairment amount = €30,000
- accumulated changes in fair value due to credit risk = not reported
- carrying amount = €70,000

Since an impairment is recognised on the credit, accumulated changes in fair value due to credit risk are not recognised (i.e. the attribute is not reported). Accumulated impairments are shown in the carrying amount as a deduction, but accumulated impairments do not reduce the outstanding nominal amount.

11.5 Type of impairment

Manual Part II, Chapter 5.4.6

Definition: The attribute “Type of impairment” is used to report the type of impairment.

Mandatoriness: The attribute is conditionally mandatory, exceptions listed below.

Value: code list.

The reportable type of impairment is linked to the accounting practice, which means that there are separate values for entities applying the IFRSs and national GAAP.

The attribute “Type of impairment” is referred to as “Impairment assessment method” in the link.

The attribute is not reported if the credit is still serviced by the observed agent but fully derecognised.

The attribute is not reported if no impairments can be applied to the credit on the basis of the accounting standard and balance sheet classification.



The attribute is also not reported if the credit does not belong to the balance sheet of the observed agent.

11.6 Impairment assessment method

Manual Part II, Chapter 5.4.7

Definition: The attribute “Impairment assessment method*” is used to report the method by which the impairment is assessed, if the instrument is subject to impairment in accordance with applied accounting standards. Collective and individual methods are distinguished.

Mandatoriness: The attribute must always be reported.

Value: code list.

The code value zero “Not subject to impairment or Not applicable” is reported for the attribute,

- if the credit is still serviced by the observed agent but fully derecognised
- if no impairments can be applied to the credit on the basis of the accounting standard and balance sheet classification
- if the credit does not belong to the balance sheet of the observed agent.

11.7 Sources of encumbrance

Manual Part II, Chapter 5.4.3

Definition: The attribute “Sources of encumbrance” is used to report the type of transaction in which the exposure is encumbered. An asset will be treated as encumbered if it has been pledged or if it is subject to any form of arrangement to secure, collateralise or credit enhance any instrument based on which the asset is not freely transferable.

Legal basis: Regulation (EU) No 680/2014.

Mandatoriness: The attribute is conditionally mandatory, exceptions listed below.

Value: code list.

The attribute is not reported if the credit is still serviced by the observed agent but fully derecognised.

A credit not involving encumbrances is assigned the value “No encumbrance” for the attribute “Sources of encumbrance”. Other credits, whether fully or partly



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encumbered, are reported in credit data reporting in accordance with the relevant source of encumbrance.

The general guideline is that credits that are freely usable by the observed agent in financial transactions are free from encumbrance. If a credit concurrently involves several encumbrances, the most important encumbrance is reported in the attribute.

Where a protection consists of a group of loans instead of an individual credit and only if part of the credits are used as protection and the classification can be made, then only the loans used as protection are reported as encumbered. If the classification cannot be made, then all credits pertaining to the protection are recorded as encumbered.

If a credit has been provided to the Bank of Finland as collateral for central bank refinancing, the encumbrance “Central bank refinancing” must always be reported for the credit.

11.8 Accumulated changes in fair value due to credit risk

Manual Part II, Chapter 5.4.8

Definition: The attribute “Accumulated changes in fair value due to credit risk” is used to report changes in fair value due to credit risk.

Legal basis: Regulation (EU) No 680/2014. Part 2.46 of Annex V to the Regulation.

Mandatoriness: The attribute is conditionally mandatory, exceptions listed below.

Value: Euro amount (without sign)

The attribute is used to describe the effect of a change in credit risk on fair value. The change can be assessed on the basis of other factors, for example by reference to a third-party assessment of the debtor’s creditworthiness before the deterioration of creditworthiness has (yet) had an impact on the servicing of the extended credit. In this case, an estimate of the accrued change is entered in the attribute.

If there have not been changes in the creditworthiness of the credit or debtor, zero is reported for the attribute.

A recognised change in fair value due to credit risk may be positive or negative in the financial statements. If the fair value of a credit has decreased due to a change in the debtor’s creditworthiness, a positive amount is reported for the attribute. If the fair value has increased due to the debtor’s improved creditworthiness, the change is not reported. In circumstances where fair value has risen due to improved creditworthiness, 0.0 is reported as a default value.



The attribute is not reported if the credit is still serviced by the observed agent but fully derecognised.

The attribute is not reported if the credit is not measured under the accounting standard at fair value through profit and loss (see table 4. Connection of instrument classification to certain attributes).

If the credit is not included in the observed agent's assets, the attribute is not reported.

The attributes "Accumulated impairment amount" and "Accumulated changes in fair value due to credit risk" are not reported for the credit at the same time.

11.9 Performing status of the instrument

Manual Part II, Chapter 5.4.9

Definition: The attribute "Performing status of the instrument" is used to report whether the credit is performing or non-performing.

Mandatoriness: The attribute must always be reported.

Value: code list.

The code list includes a national extension. The Bank of Finland divides performing credits into two categories.

The attribute describes the performing status of a credit also in circumstances where the credit is not included in assets. When the credit is not performing, there are difficulties related to the servicing of the credit. A credit performing throughout its life is assigned the value "Performing not under probation" in the attribute "Performing status of the instrument".

This attribute does not concern instruments fully derecognised from the balance sheet. "The performing status of the instrument" for such instruments is reported as "Not applicable".

The performing status of the instrument reflects the same principles by which credits are reported in FINREP Template 18 (non-performing exposures).

Non-performing exposures are receivables meeting one of the following criteria:

- material exposures that are over 90 days past-due
- the debtor is assessed as unlikely to pay its credit obligations in full without realisation of collateral, regardless of the existence of any past due amount or of the number of days past due.

If a non-performing credit has encumbrances, the non-performing credit is moved from non-performing into performing through a probation. In this case, the status "Performing under probation". The length of the probation is (at least)



two years. An unencumbered non-performing credit is moved to performing without a probation.

Example 1: The assessment of credit status “on the basis of the transaction”

The observed agent assesses a debtor (DEB#1) with two credits included in retail exposures in solvency calculation. The observed agent applies to the credits the option included in Article 178(1) of the CRR “in the case of retail exposures, institutions may apply the definition of default laid down in points (a) and (b) of the first subparagraph at the level of an individual credit facility rather than in relation to the total obligations of a borrower”.

The inception and settlement date of both credits was 31/12/2017.

- Credit 1 is not in default but has been non-performing since 12/09/2019.
- Credit 2 is in default since on 20/09/2019 it has been past due more than 90 days and is therefore non-performing.

The following is reported for the period 2019M09:

Report 2019M09	Credit 1	Credit 2
Instrument information record		
Default status of the instrument	Not in default	Default because more than 90/180 days past due
Date of the default status of the instrument	31.12.2017	20.9.2019
Record Accounting information		
Performing status of the instrument	Non-performing	Non-performing
Date of the performing status of the instrument	12/09/2019	20/09/2019

Since the observed agent applies the option under Article 178(1) to the assessment of the default status, then the attributes “Default status of the counterparty” and “Date of the default status of the counterparty” are not reported in the “Counterparty risk and default record”.

Example 2: The assessment of credit status “on the basis of the debtor”

The observed agent assesses a debtor (DEB#1) with two credits included in retail exposures in solvency calculation. The observed agent does not apply the option included in Article 178(1) of the CRR to the credits.

The inception and settlement date of both credits was 31/12/2017.

- Credit 1 is not past due, but since the assessment of the performing status is made on the basis of the debtor and credit 2 has been past due for more than 90, then the “Performing status of the instrument” for credit 1 is assigned the value “Non-performing”.
- Credit 2 is in default since on 20/09/2019 it has been past due more than 90 days and is therefore non-performing.



Instrument information record		
Default status of the instrument	not reported	not reported
Date of the default status of the instrument	not reported	not reported
Record Accounting information		
Performing status of the instrument	Non-performing	Non-performing
Date of the performing status of the instrument	20/09/2019	20/09/2019
Counterparty risk and default record	Debtor DEB#1	
Default status of the counterparty	Default because more than 90/180 days past due	
Date of the default status of the counterparty	20/09/2019	

Example 3: Performing status of the credit not included in retail exposures (but corporate exposures)

The observed agent has three debtors with the following performing statuses in its credit portfolio:

- debtor 1: corporate exposure performing throughout the loan period (credit 1)
- Debtor 2: non-performing and status reported on 15/09/2017 as “Default because unlikely to pay” (credit 2)
- debtor 3: exposure to central government performing throughout the loan period (credit 3)
- credits 1 and 2 granted on 11/05/2018 and credit 3 on 21/10/2019

Report 2019M09	Credit 1	Credit 2	Credit 3
Instrument information record			
Default status of the instrument	not reported	not reported	not reported
Date of the default status of the instrument	not reported	not reported	not reported
Record Accounting information			
Performing status of the instrument	Performing not under probation	Non-performing	Performing not under probation
Date of the performing status of the instrument	11/05/2018	15/09/2019	21/01/2019
Counterparty risk and default record			
Default status of the counterparty	Not in default	Default because unlikely to pay	Not in default
Date of the default status of the counterparty	not reported*	15/09/2019	not reported*

*) the attribute is not reported if the instrument has been performing throughout the loan period

11.10 Date of the performing status of the instrument



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Definition: The attribute “Date of the performing status of the instrument” is used to report the date on which the performing status, as reported in the data attribute “Performing status of the instrument”, is considered to have been established or changed.

Mandatoriness: The attribute must always be reported.

Value: Date.

The date reported in the “Date of the performing status of the instrument” must be earlier than or the same as the reporting reference date. If the credit has been performing throughout the loan period, then the inception date of the credit is reported. A credit that was non-performing until date t and became performing with probation as at $t+1$ is reported for the date attribute as $t+1$ (provided that the credit has remained performing). When the probation ends and the attribute is assigned the value “Performing, no probation”, the date changes again.

11.11 Provisions associated to off-balance sheet exposures

Manual Part II, Chapter 5.4.11

Definition: The attribute “Provisions associated to off-balance-sheet exposures” is used to report the amount of provisions for off-balance-sheet amounts.

Mandatoriness: The attribute is conditionally mandatory, exceptions listed below.

Value: Euro amount.

Value is reported in the attribute if the observed agent has granted a credit limit to a debtor which cannot be cancelled unconditionally at any time without notice or that does not contractually provide for a right of revision due to deterioration in the debtor’s creditworthiness.

The attribute is not reported if the credit is still serviced by the observed agent but fully derecognised.

The attribute is not reported if the credit involves an off-balance sheet amount.

11.12 Status of forbearance and renegotiation

Manual Part II, Chapter 5.4.12

Definition: The attribute “Status of forbearance and renegotiation” is used to report whether the instrument is subject to forbearances or renegotiation.

Mandatoriness: The attribute must always be reported.



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Value: Code list.

The purpose of the attribute is to describe all modifications of the terms and conditions of the credit, and the date attribute always refers to the most recent change. A credit may pass through multiple statuses reported in this attribute over its life.

Normally when a credit enters credit data reporting, the attribute “Status of forbearance and renegotiation” is assigned the value “Not forborne or renegotiated”. If the servicing of the credit during the loan period does not involve difficulties and the contractual terms are not intervened in, the attribute remains unchanged throughout the loan period. If a new credit is used to rearrange previous non-performing finance, the new loan may be assigned at inception the value: “Forborne: refinanced debt”.

A forbearance means that the debtor has or will in the near term have difficulties in meeting its financial commitments (“financial difficulties”), and the terms and conditions of the credit are modified to the benefit of the debtor (forbearance measures consist of concessions to the debtor).

If the debtor is active and renegotiates the terms of repayment, extension of the loan period or interest rate margin without the negotiations being affected by payment difficulties, the attribute is assigned the value “Renegotiated instrument without forbearances”.

If a credit institution makes an offer applicable to all debtors for example on postponing the amortisation of outstanding capital and if a debtor accepts the offer, the renegotiation of the contract is reported as “Renegotiated instrument without forbearances”.

Changes resulting from contractual terms without actions by the debtor, for example in terms of the length of the loan period, are not reportable changes.

11.13 Date of the forbearance and renegotiation status

Manual Part II, Chapter 5.4.13

Definition: The attribute “Date of the forbearance and renegotiation status” is used to report the date on which a forbearance or renegotiation status as reported under “Status of forbearance and renegotiation” is considered to have occurred.

Mandatoriness: The attribute must always be reported.

Value: Date.

If the credit has been performing throughout the loan period and no changes are made to the credit contract, then the inception date is reported in the “Date of the forbearance and renegotiation status”.



If a new credit is used to rearrange previous non-performing finance, then the inception date of the new credit is reported in the date field.

The date of the attribute always changes when the master field (“Status of forbearance and renegotiation”) changes. The date field may change even if the master field does not, if the terms and conditions of the contract have been modified without affecting the value of the master field.

11.14 Cumulative recoveries since default

Manual Part II, Chapter 5.4.14

Definition: The attribute “Cumulative recoveries since default” is used to report the total amount recovered since the beginning date of the most recent default.

Mandatoriness: The attribute is conditionally mandatory, exceptions listed below.

Value: Euro amount.

In calculating cumulative recoveries since default, all recoveries are taken into account regardless of their source. This includes for example all voluntary recoveries, recoveries from the sale of a hedging instrument and any amounts paid by the collateral provider. Cumulative recoveries do not include expenses caused for example by the sale of a protection instrument. Only recoveries reducing the amount of unpaid capital are taken into account.

The attribute does not include recoveries from previous default periods, but the cumulative recoveries are set to zero at the beginning of each new period.

The attribute is not reported at all if,

- the credit has performed since inception, and assessment of its default status is conducted on the basis of the “transaction principle” under Article 178 of the CRR
- The debtor has not been in default during the life of the credits with the observed agent, and assessment of its default status is conducted on the basis of the “debtor principle”.

Cumulative recoveries are also reported for periods when the instrument or counterparty no longer is in default. This ensures that the recoveries during the period of change of the default status are also reported.

Cumulative recoveries and the outstanding nominal amount are related, since recoveries are shown as a reduction of the nominal amount.

In addition, it must be taken into account that the default date from which recoveries are calculated is not necessarily in the same period when the value reported for the default status of the instrument or counterparty changes.



Example 1: Cumulative recoveries since default

The observed agent has granted the credit in 2018M02.

- The credit is assessed to be in default on 10/08/2018 (due to the debtor being unlikely to pay)
- In 2018M12, the outstanding nominal amount is €100,000, €20,000 has been recovered, but the amount includes €5,000 of legal fees payable to third parties.
- The debtor is assessed as performing on 10/07/2019.
- The credit is assessed to be in default on 30/09/2020 (due to the debtor being unlikely to pay)

Reference date	Cumulative recoveries since default	Outstanding nominal amount	Performing status of the instrument	Default status of the counterparty	Date of the default status of the counterparty
2018M03	Not reported	100,000.00	Performing not under probation	Not in default	Not reported
2018M09	0.00	100,000.00	Non-performing	Default because unlikely to pay	10/08/2018
2018M12	15,000.00	85,000.00	Non-performing	Default because unlikely to pay	10/08/2018
2019M09	15,000.00	85,000.00	Performing under probation	Not in default	10/07/2019
2019M12	15,000.00	85,000.00	Performing under probation	Not in default	10/07/2019
2020M03	15,000.00	85,000.00	Performing under probation	Not in default	10/07/2019
2020M06	15,000.00	85,000.00	Performing under probation	Not in default	10/07/2019
2020M09	0.00	85,000.00	Non-performing	Default because unlikely to pay	30/09/2020

11.15 Prudential portfolio

Manual Part II, Chapter 5.4.15

Definition: The attribute “Prudential portfolio” indicates whether the instrument belongs to the trading book. Trading book means all positions in financial instruments and commodities held by an institution either with trading intent, or in order to hedge positions held with trading intent. The value if the attribute depends on the classification of the credit either in the trading book or non-trading book for the purposes of the calculation of the capital ratio, hence the classification is not based on instrument type or accounting classification.



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Legal basis: Regulation (EU) No 575/2013. Article 4(1)(86) of the Regulation.

Mandatoriness: The attribute must always be reported.

Value: code list.

The code value zero "Not applicable" is reported for the attribute,

- if the credit is still serviced by the observed agent but fully derecognised.
- if the credit does not belong to the balance sheet of the observed agent.

11.16 Carrying amount

Manual Part II, Chapter 5.4.16

Definition: The attribute "Carrying amount" is used to report the amount reported on the asset side of the balance sheet. Carrying amount includes accrued interest.

Legal basis: Regulation (EU) No 680/2014. Annex V to the Regulation.

Mandatoriness: The attribute is conditionally mandatory, exceptions listed below.

Value: Euro amount.

The carrying amount is the net carrying amount for instruments measured at amortised cost and the fair value for instruments measured at fair value through other comprehensive income. The carrying amount is reported net of impairment if the credit is recorded in a portfolio including impairments.

The carrying amount includes the amount reported in the data attribute "Accrued interest" in the "Instrument information record".

If an instrument is in the scope of hedge accounting, and the effect of the protection can be reported at instrument level, the effect of the protection is allocated to the carrying amount.

The attribute is not reported if the credit is still serviced by the observed agent but fully derecognised.

The attribute is also not reported if the credit does not belong to the balance sheet of the observed agent.

If the observed agent net repurchase agreements in its accounting, the effect of netting is not allocated to the carrying amount.



12 EXITING CREDIT

In credit data reporting, a credit consists of a combination of the contract and instrument identifier. The objective is to keep the reporting of credits exiting the system and remaining in it as consistent as possible.

In the context of removal of a credit, attention must be paid to the AnaCredit Regulation, national special requirements (there is no threshold value for a credit to be reported), the Bank of Finland's reporting model (schema), statistical requirements for flow calculation, reporting of credit protection and content requirements for attributes linked to the credit.

A credit may exit the system only through a report submitted by a reporting agent. The observed agent indicates whether the instrument remains on the balance sheet in the *Credit status attribute* in the *Instrument information record*. The attribute may take the following values:

- 1 = Continuing
- 2 = Exiting
- 3 = Exiting (written off)

Value 1 (Continuing) is used to report credits that do not exit the scope of reporting during the reference period. Only credits reported with the value 1 move from the final period in a quarter to the next one.

Credits reported with the value 2 (Exiting) are linked to the records and attributes for the reference period. The credit exits the balance sheet as paid off by the debtor without write-offs recognised by the observed agent.

- If a credit exits during the final period in quarter, then all records and attributes for the credit are reported (records related to protection are voluntary).
- If a credit exits during an interim month in a quarter, then the *Accounting record* and its attributes are not reported (records related to protection are voluntary) at the end of the quarter.
- A credit with a non-zero value reported in *Accumulated write-offs* in the *Accounting record* at the end of the previous period but which exits the balance sheet due to being amortised by the debtor is reported with the value 2 (Exiting).

A credit reported with the value 2 for the *Credit status attribute* is not reported in the next period.

A credit reported with the value 3 (Exiting) is linked to all records and attributes for the reference period until the report closing the quarter. The value 3 is used when the exit involves a write-off during the last quarter, or when the amount



of *Accumulated write-offs* increases from the previous quarter to the current one.

A credit reported with the value 3 for the *Credit status* attribute is not reported after the final period of the quarter.

Table 5. Value and reporting of the attribute *Credit status*

Credit	M03	M04	M05	M06	M07
001	1	2	no reporting	no reporting	no reporting
002	1	1	2	no reporting	no reporting
003	1	1	1	2	no reporting
004	1	3	3	3	no reporting
005	1	1	3	3	no reporting
006	1	1	1	3	no reporting

During a quarter, in periods when the attribute *Credit status* takes the value 2 or 3, complete data is reported on the credit (excluding protection data, see section 12.6 for more detail). Hence, if *Credit status* takes the value 2 or 3 in period M06, then also the accounting record is linked to the credit.

The Bank of Finland monitors the use of the attribute *Credit status*. If a credit was assigned the value 1 (Continuing) in the previous quarter, then it must be reported in the following quarter.

12.1 Allocation of exiting credits

A credit may exit the system for several reasons. This section describes the reporting of exiting credit in general terms.

When a credit exits the system, the attribute *Credit status* takes the value 2 (Exiting) if,

- the credit is amortised without a write-off recognition
- the credit is transferred (sold) without a write-off recognition

When a credit exits the system, the attribute *Credit status* takes the value 3 (Exiting (written off)) if,

- the credit is subject to full write-off during the quarter
- the credit exits due to a combination of amortisation and write-off during the quarter
- the credit exits due to a combination of sale and write-off during the quarter

12.1.1 Amortisation of credit without write-offs

The debtor pays off the entire outstanding nominal amount at once:



- the last amortisation resets the outstanding nominal amount and credit line, if an off-balance-sheet amount has been reported for the credit, to zero
- the credit is reported with the value 2 (Exiting) in the attribute Credit status
- the records and attributes which should be reported for the period in question in the case of a continuing credit are linked to the credit.
- the reporting of protection is voluntary (see section 12.2.6)
- the credit is no longer reported in the following period

12.1.2 Sale of credit without write-offs

The creditor sells the entire credit to a third party without a write-off recognition so that the servicing of the credit ends:

- the transfer of the entire credit resets the accrued interest and credit line, if an off-balance-sheet amount has been reported for the credit, to zero
- in the context of transfer of the entire credit, the value reported for the attribute Transferred amount equals the value of the attribute Outstanding nominal amount
- the credit is reported with the value 2 (Exiting) in the attribute Credit status
- the records and attributes which should be reported for the period in question in the case of a continuing credit are linked to the credit
- reporting of the protection is voluntary
- the credit is no longer reported in the following period

12.1.3 Full write-off of a credit

The credit institution recognises a credit loss impairment equalling the entire outstanding nominal amount (write-off):

- the write-off recognition resets the accrued interest and credit line, if an off-balance-sheet amount has been reported for the credit, to zero
- the credit is reported with the value 3 Exiting (written off) in the attribute Credit status
- the credit is reported until the final period of the quarter
- the records and attributes which should be reported for the periods in question in the case of a continuing credit are linked to the credit
- in the period ending the quarter, the value in the attribute Accumulated write-offs increases corresponding to the write-off recognition made during the quarter from the previous quarter-end value
- in the period ending the quarter, the value in the attribute Carrying amount is zero
- in the period ending the quarter, the attribute Balance sheet recognition takes the value 3 (Fully derecognised)
- reporting of the protection is voluntary



12.1.4 Combination of amortisation and write-off

The debtor pays off part of the outstanding nominal amount and the credit institution recognises the remainder of the outstanding nominal amount as a credit loss:

- the combination resets the outstanding nominal amount, accrued interest and credit line, if an off-balance-sheet amount has been reported for the credit, to zero
- the credit is reported with the value 3 Exiting (written off) in the attribute Credit status
- the credit is reported until the final period of the quarter
- the records and attributes which should be reported for the period in question in the case of a continuing credit are linked to the credit
- in the period ending the quarter, the value in the attribute Accumulated write-offs increases corresponding to the write-off recognition made during the quarter from the previous quarter-end value
- in the period ending the quarter, the value in the attribute Cumulative recoveries since default grow in line with the amount amortised, since the credit is assumed to have been in default at the end of the previous quarter
- in the period ending the quarter, the value in the attribute Carrying amount is zero
- in the period ending the quarter, the attribute Balance sheet recognition takes the value 3 (Fully derecognised)
- reporting of the protection is voluntary

12.1.5 Combination of sale and write-off

The creditor sells the entire credit to a third party and makes a write-off recognition so that the servicing of the credit ends:

- the combination resets the accrued interest and credit line, if an off-balance-sheet amount has been reported for the credit, to zero
- in the context of transfer of the entire credit, the value reported for the attribute Transferred amount equals the value of the attribute Outstanding nominal amount
- the credit is reported with the value 3 Exiting (written off) in the attribute Credit status
- the credit is reported until the final period of the quarter
- the records and attributes which should be reported for the period in question in the case of a continuing credit are linked to the credit
- in the period ending the quarter, the value in the attribute Accumulated write-offs increases corresponding to the write-off recognition made during the quarter from the previous quarter-end value
- in the period ending the quarter, the value in the attribute Cumulative recoveries since default grow corresponding to the amount transferred, since the credit is assumed to have been in default at the end of the previous quarter



- in the period ending the quarter, the value in the attribute Carrying amount is zero
- in the period ending the quarter, the attribute Balance sheet recognition takes the value 3 (Fully derecognised)
- reporting of the protection is voluntary

12.2 Records and reportable attributes in the Exiting credit schema

This section describes the reporting requirements for exiting credit by attribute. Table-specific key identifiers and referential integrities are described in paragraph 2.

12.2.1 Counterparty-instrument record

The attribute *Joint liability amount* is a data item outside the key identifier, and it is used to report the debtors' liabilities for outstanding nominal amount when there are more than one debtors. For exiting credit, the amount is zero.

12.2.2 Instrument information record

In the *Accounting record*, a credit is described by 39 attributes. Templates 2 (instrument data) and 3 (financial data) of the AnaCredit Regulation are reported in the record. The attributes in template 2 are such data pertaining to the credit that seldom change over time. As a rule, exiting credit is reported the same information in these attributes as in the previous period when the credit was reported by the value 1 (Continuing) in *Credit status*.

12.2.2.1 Common information

Table ⁵		Attribute	Reporting of exiting credit
2	List	Instrument type	Always ⁶ / Previous reported value
2	List	Revolving credit	If instrument type takes the value Factoring, Other accounts receivables or Other loans, then the previous reported value
2	List	Credit lines other than revolving credit	
2	List	Purpose	Always / Previous reported value
2	List	Amortisation type	Always / Previous reported value
2	List	Payment frequency	Always / Previous reported value

12.2.2.2 Other common information

Table		Attribute	Reporting of exiting credit
2	List	Syndicated loan	Always / Previous reported value

⁵ The column "Table" refers to the Bank of Finland's table-specific reporting requirements, including 11 tables in total.

"Always" refers to the requirement that the attribute concerned must always be reported regardless of the instrument type or other credit characteristics.



2		Syndicated contract identifier	Previous reported value if reported for the previous period
2	List	Fiduciary instrument	Always / Previous reported value
2	List	Project finance loan	Always / Previous reported value
2	List	Subordinated debt	Always / Previous reported value
2	List	Repayment rights	Always / Previous reported value
2	List	Recourse	Always / Previous reported value

12.2.2.3 Dates

Table		Attribute	Reporting of exiting credit
2	Date	Valid from	Always / Previous reported value
2	Date	Settlement date	Previous reported value if reported for the previous period
2	Date	Legal final maturity date	Previous reported value if reported for the previous period

12.2.2.4 Interest information

Table		Attribute	Reporting of exiting credit
2	List	Interest rate type	Always / Previous reported value
2	Date	End date of interest-only period	Previous reported value if reported for the previous period
3	Date	Next interest rate reset date	Previous reported value if reported for the previous period
2	List	Interest rate reset frequency	Always / Previous reported value
2	%	Interest rate cap	Previous reported value if reported for the previous period
2	%	Interest rate floor	Previous reported value if reported for the previous period
2	List	Reference rate value	Always / Previous reported value
2	List	Reference rate maturity	Always / Previous reported value
2	%	Interest rate spread/margin	Previous reported value if reported for the previous period
3	%	Interest rate	Always / Previous reported value [or zero]

12.2.2.5 Amount information

Table		Attribute	Reporting of exiting credit
3	€	Accrued interest	0
2	List	Currency	Always / Previous reported value
2	€	Commitment amount on inception date	Previous reported value if reported for the previous period



3	€	Outstanding nominal amount	0 or in case of fully transferred (sold) credit, transferred amount
2	€	Off-balance sheet amount	0 if reported for the previous period

12.2.2.6 Default information

Table		Attribute	Reporting of exiting credit
3	List	Default status of the instrument	Most recent data
3	Date	Date of the default status of the instrument	Date of the most recent data
3	€	Arrears for the instrument	0
3	Date	Date of past due for the instrument	Previous reported value if reported for the previous period

12.2.2.7 Other information

Table*		Attribute	Reporting of exiting credit
3	€	Transferred amount	0 or in case of fully transferred (sold) credit, transferred amount
3	List	Type of securitisation	Always / Previous reported value
2	€	Fair value changes due to changes in credit risk before purchase	Previous reported value if reported for the previous period

12.2.3 Accounting record

In the *Accounting record*, a credit is described by 16 attributes. Eight (8) of these attributes are linked to the code list, six (6) are value fields in euro terms and two (2) are date fields.

12.2.3.1 Code list attributes

Table	Attribute	Reporting of exiting credit
6	Accounting classification of instruments	Always / Previous reported value
6	Balance sheet recognition	Fully derecognised
6	Type of impairment ⁷	Always / Previous reported value
6	Impairment assessment method*	Always / Previous reported value
6	Sources of encumbrance ⁷	Always / Previous reported value
6	Performing status of the instrument	Always / Previous reported value

The attribute is not required if credit is fully derecognised but being serviced.



6	Status of forbearance and renegotiation	Most recent data
6	Prudential portfolio ⁷	Always / Previous reported value

12.2.3.2 Amount fields

Table	Attribute	Reporting of exiting credit
6	Accumulated write-offs ⁷	Most recent data
6	Accumulated impairment amount	0 if reported for the previous period
6	Accumulated changes in fair value due to credit risk	0 if reported for the previous period
6	Provisions associated to off-balance-sheet exposures	0 if reported for the previous period
6	Cumulative recoveries since default	Most recent data

12.2.3.3 Date fields

Table	Attribute	Reporting of exiting credit
6	Date of the performing status of the instrument	Always / Previous reported value
6	Date of the forbearance and renegotiation status	Date of the most recent data

12.2.4 Counterparty reference record

The debtor of an exiting credit may concurrently have several outstanding credits from the observed agent, and therefore the Counterparty-reference record must always contain the most recent data.

The minimum requirement is that the counterparty identifier includes the same attributes that were reported for it in the previous period.

12.2.5 Counterparty risk and default record

12.2.5.1 Attributes

Table	Attribute	Reporting of exiting credit
9	Probability of default	If reported for the previous period, the most recent data
10	Default status of the counterparty	If reported for the previous period, the most recent data
10	Date of the default status of the counterparty	If reported for the previous period, the most recent data



If there is already previously reported data, data must be reported in any case if the debtor has several outstanding loans from the observed agent.

12.2.6 Protection

The reporting of protection for exiting credit is voluntary. The section describes the reporting of data related to protection both in case where protection is not reported and in case it is reported voluntarily.

12.2.6.1 Protection is not reported for exiting credit.

If the observed agent decides not to report protection data, all protection records are left non-reported. The records are:

- Instrument-protection record
- *Protection record*
- *Protection provider record*

12.2.6.2 Voluntary reporting of protection for exiting credit.

If data on protection concerning exiting credit is reported, it must be reported on a complete basis in order for the validations to work properly. The data is primarily the same that was reported in the previous period, when the value of the attribute *Credit status* was 1 (Continuing).

12.2.6.2.1 Instrument-protection record

Table	Attribute	Reporting of exiting credit
8	Protection allocated value	0
8	Third party priority claims against the protection	0
8	General collateral	Always / Previous reported value

12.2.6.2.2 Protection provider record

Table	Attribute	Reporting of exiting credit
11	Protection provider identifier	Always / Previous reported value
11	Protection provider type	Always / Previous reported value

12.2.6.2.3 Protection record

12.2.6.2.4 Code list attributes

Table	Attribute	Reporting of exiting credit
7	Protection type	Always / Previous reported value
7	Protection value type	Always / Previous reported value
7	Protection valuation approach	Always / Previous reported value



7	Real estate collateral location	Previous reported value if reported for the previous period
7	Real estate collateral location country	Previous reported value if reported for the previous period

12.2.6.2.5 Date fields

Table	Attribute	Reporting of exiting credit
7	Maturity date of the protection	Previous reported value if reported for the previous period
7	Date of protection value	Always / Previous reported value
7	Date of original protection value ⁸	Previous reported value if reported for the previous period

12.2.6.2.6 Amount fields

Table	Attribute	Reporting of exiting credit
7	Protection value	Always / Previous reported value
7	Original protection value ⁸	Previous reported value if reported for the previous period

12.2.6.2.7 Other attributes

Table	Attribute	Reporting of exiting credit
7	Postal code of the real estate collateral location	Previous reported value if reported for the previous period
7	Real estate collateral location city	Previous reported value if reported for the previous period

13 INTER-MFI DEPOSITS (ASSETS)

Positions between credit institutions are generally called deposits instead of loans; for example, the observed agent has a reserve deposit with the central bank recorded in its assets. In the credit data collection, all receivables from credit institutions are reported with deposit instruments (instruments in the code list starting with "2"). **The reporting obligation only concerns the observed agent's receivables** (assets) In the credit data collection, deposits recorded as the observed agent's debt (liabilities) are not reported. All receivables within the scope of reporting from the Bank of Finland or another credit institution are described using one of the deposit instruments even though a corresponding

⁸ Mandatory if credit granted on 1 September 2018 or thereafter



receivable from another entity than a credit institution is reported using a loan instrument (instruments in the code list starting with “4”).

13.1 Instruments used for inter-MFI deposits

The instrument category “Deposits other than reverse repurchase agreements” under the AnaCredit Regulation is broken down in the Bank of Finland's credit data collection into instruments used in the MFI data collection (“RATI”):

- Transferable overnight deposits (221)
- Non-transferable overnight deposits (222)
- Deposits with agreed maturity (225)
- Deposits redeemable at notice (226)
- e-money: Hardware based (227)
- e-money: Software based (228)

Part II of the AnaCredit Manual clarifies concepts related to the credit. The use of the instrument type “Deposits other than reverse repurchase agreements” in describing inter-MFI credits is justified by the requirements of the Regulation on the European System of Accounts (ESA2010). The Regulation governs all statistics describing the economy in accordance with Article 5.81 of the ESA2010 Regulation.

Deposits include positions between credit institutions (debtor/creditor relationships between credit institutions) including:

- central bank deposits (reserve deposits and other deposits)
- collateral deposits with credit institutions
- short-term funding between credit institutions
- deposits with other credit institutions

RATI instruments 41 Money market promissory notes, 42 Revolving loans, 43 Overdrafts and 4791 Other loans are always reported as inter-MFI deposits. As regards other instrument categories (for example credit card credit and leases), the reporter may use discretion as to whether to use an instrument starting with ‘4’ or ‘2’.

Credits granted to credit institutions referred to in Article 4 1.1 b of the CRR are not reported as inter-MFI deposits. Loans given to such non-MFI -credit institutions are reported by credit instruments (instruments starting with ‘4’).

13.2 Reporting of inter-MFI deposits and intra-group items

In accordance with definition 1.1 a in Article 4 of the Capital Requirements Regulation, a credit institution means an undertaking the business of which is to take deposits or other repayable funds from the public and to grant credits for its own account. In accordance with paragraph 1.1 b, credit institutions may also include collective investment undertakings meeting certain requirements (non-MFI credit institutions). In the credit data reporting, only the criterion 1.1 a applies to the definition of inter-MFI deposits.



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The definition of credit institution is clarified in Annex 1, Part 1.1 of the Regulation on MFI balance sheet statistics. It provides that financial institutions other than credit institutions which issue financial instruments that are considered close substitutes for deposits are classified as MFIs provided that they meet the MFI definition in other respects.

Section 5.3 of Annex 1 of the same Regulation describes the reporting of intra-group loans. It provides that an additional distinction is made for intra-group loan and deposit positions and transactions between deposit taking corporations to allow the identification of inter-linkages between credit institutions belonging to the same group (domestic and other euro area Member States).

In Finland, credit institutions consist of credit institutions supervised by the Financial Supervisory Authority. Their sectoral classification starts with S.122 and they are broken down as follows:

- deposit banks (S.1221) may receive deposits from the public
- credit companies (S.1222 and S.1223), which are also credit institutions subject to the ECB's reserve deposit

Section 2 of Part I of the AnaCredit Manual clarifies the concept of a counterparty. The basic concept for counterparties reported in the data collection is an “institutional unit”. In accordance with definition 2.12 provided in the Regulation on the European system of national accounts (ESA2010), an institutional unit is an “economic entity characterised by decision-making autonomy in the exercise of its principal function. A resident unit is regarded as constituting an institutional unit in the economic territory where it has its centre of predominant economic interest”.

A domestic credit institution has one unique corporate identifier (business ID), but there may be several branches, either in the same municipality or around the country. All branches operate under the same business ID, and the reporting requirement obliges the credit institution to report all credits granted under the same business ID.

The credit institution's internal receivables (for example the headquarters' receivables from a branch) are not reported, since the branches in total constitute the party under the reporting obligation. If there are several separate legal units within the same group operating in a single country, receivables between these separate units (each with a unique business ID) are reported.

In accordance with definition 4 in Article 1 of the AnaCredit Regulation, a “foreign branch” means an institutional unit which is a legally dependent part of a legal entity resident in a different country to that where the legal entity is incorporated in accordance with the concept of a “single branch” referred to in Article 2(3) of Regulation (EC) No 2533/98.

Article 3 of the AnaCredit Regulation limits the actual reporting population, providing that “The actual reporting population shall consist of resident credit institutions and resident foreign branches of credit institutions, regardless of



whether or not they are institutions supervised under Directive 2013/36/EU of the European Parliament and of the Council”.

If a domestic credit institution has a foreign branch, the foreign branch is considered a separate institutional unit in reporting, and the credit institution's receivables from the branch or vice versa must be reported.

Example 1

Domestic credit institution A has, in addition to the headquarters (A1), 49 branches around Finland (A2–A50). Credit institution (A) has a credit institution operating in Finland and specialising in consumer credit (B). In addition, the credit institution has established a branch (C) operating with the credit institution status in Sweden.

In the credit data collection, credit institution A:

- reports an inter-MFI deposit in credit institution B
- reports an inter-MFI deposit in credit institution C
- does not report its branches' internal receivables (receivables among 1–A50)

In the credit data collection, credit institution B:

- reports an inter-MFI deposit in credit institution A (deposits in all branches A1–A50 in total)
- reports an inter-MFI deposit in credit institution C

In the credit data collection, credit institution C (if under the reporting obligation)

- reports an inter-MFI deposit in credit institution A (deposits in all branches A1–A50 in total)
- reports an inter-MFI deposit in credit institution B

A financial transaction between credit institution is reported as an inter-MFI deposit if,

- the transaction is reported in assets (paragraph II of Article 4 of the AnaCredit Regulation) **or**
- the transaction gives rise to credit risk for the observed agent (paragraph I of Article 4 of the AnaCredit Regulation)

13.3 Report data

13.3.1 Outstanding nominal amount, off-balance sheet amount and credit status

The attributes “Outstanding nominal amount” and “Off-balance sheet amount” are reported for a combination of contract and instrument identifiers underlying an inter-MFI deposit similarly to any other credit.

The observed agent does not report deposits recognised as liabilities in its balance sheet, regardless of what the counterparty is. Only items counting as the observed agent's assets are reported.



Observed agent A reports only the outstanding nominal amount on inter-MFI deposits if the settlement date has already passed and

- observed agent A has granted a single-tranche credit to credit institution B, **or**
- observed agent A has a deposit in credit institution B

Observed agent A reports the outstanding nominal amount and off-balance sheet amount on inter-MFI deposits if the settlement date has already passed and

- Observed agent A has granted a credit line to credit institution B, **or**
- Credit institution B has a current account with an overdraft facility in observed agent A, and credit institution B has used the credit line related to the account

If the entire credit line of an overdraft account is unused, the drawdown capacity is reported as an off-balance-sheet amount and outstanding nominal amount as zero.

Counterparty information on inter-MFI deposits is reported similarly to other counterparties' information. Credit institutions have national identifiers (and usually a LEI), and it is recommended that these are attached to the counterparty identifier reported by the reporting agent.

Inter-MFI deposits are reported in the attribute "Credit status" as continuing throughout the validity of the contract (or existence of the account).

13.3.2 Reporting of central bank deposits

The minimum reserve deposit held by the reporting agent with the Bank of Finland on the last day of the month is reported using the instrument transferable overnight deposits (221). Overnight deposits with the central bank subject to separate agreement are reported as separate contracts using the instrument 222. In the MFI balance sheet data collection ("RATI"), corresponding items are reported on the assets side of the balance sheet using the instrument 43.

Minimum reserve deposits are paid the interest rate decided by the ECB council. In contrast, overnight deposits are paid the deposit facility rate. Monetary policy counterparties' central bank deposits may include, in addition to the reserve deposit, also other liquidity for payment transactions. In this case, the part in excess of the minimum reserve deposit is subject to the overnight deposit rate, where the reserve requirement has already been fulfilled during the holding period. The interest rates applicable to central bank deposits (minimum bid rate of the Eurosystem's main refinancing operations / overnight deposit rate) are published at the Bank of Finland website.

As regards central bank deposits, the attribute 'Interest rate type' is assigned the value 1 (Fixed) and 'Interest rate reset frequency' the value 0 (Not resettable or not applicable). Consequently, the attributes related to variable interest rate are not reported.



Table 6. Example of a reserve deposit in credit data reporting, example values of attributes by record

* If the “Accumulated impairment amount” attribute is reported then the “Type of impairment” attribute must also be reported.

** If the value of the “Accumulated impairment amount” attribute is 0.00 then the “Type of impairment” attribute must be reported according to the code list.

In the example, the top row in the column on the right shows a value pertaining to a reserve deposit, and the lower row shows the general basis of reporting in the field.

Counterparty reference record		
The counterparty reference record is reported based on the same rules as other counterparty data		
Instrument information record		
Contract identifier	CNTRCT_ID	Contract identifier
Instrument identifier	INSTRMNT_ID	Instrument identifier
Credit status	CRDT_STTS	1 (Continuing) Value based on the code list
Instrument type	TYP_INSTRMNT	221 (Transferable overnight deposits) Value based on the code list
Revolving credit	RVLVNG_CRDT	2 (No) Value based on the code list
Credit lines other than revolving credit	CRDT_LNS_OTH_RVLVNG_CRDT	2 (No) Value based on the code list
Purpose	PRPS	11 (Other purposes) Value based on the code list
Amortisation type	TYP_AMRTSTN	5 (Other) Value based on the code list
Payment frequency	PYMNT_FRQNCY	15 (Other) Value based on the code list
Syndicated loan	SYNDCTD_CNTRCT_TF	2 (Non-syndicated loan) Value based on the code list
Syndicated contract identifier	SYNDCTD_CNTRCT_TF	If a syndicated loan is assigned the value 2, the element is not reported at all
Fiduciary instrument	FDCRY	2 (Non-fiduciary instrument) Value based on the code list
Project finance loan	PRJCT_FNNC_LN	2 (non-project finance loan)



		Value based on the code list
Subordinated debt	SBRDNTD_DBT	2 (Non-subordinated debt)
		Value based on the code list
Repayment rights	RPYMNT_RGHTS	1 (On demand or at short notice)
		Value based on the code list
Recourse	RCRS	2 (Other)
		Value based on the code list
Valid from	DT_INCPTN	2010-01-01
		Mandatory
Settlement date	DT_STTLMNT	2010-01-01
		Mandatory
Legal final maturity date	DT_LGL_FNL_MTRTY	If the date exists, it is reported. In other cases, the element is not reported.
Interest rate type	TYP_INTRST_RT	1 (Fixed)
		Value based on the code list
End date of interest-only period	DT_END_INTRST_ONLY	The element is not reported
		When necessary, date
Next interest rate reset date	DT_NXT_INTRST_RT_RST	The element is not reported
		When necessary, date
Interest rate reset frequency	INTRST_RT_RST_FRQNCY	0 (Not resettable or not applicable)
		Value based on the code list
Interest rate cap	INTRST_RT_CP	The element is not reported
Interest rate floor	INTRST_RT_FLR	The element is not reported
Reference rate value	RFRNC_RT_V	0 (Not applicable)
		Value based on the code list
Reference rate maturity	RFRNC_RT_M	0 (Not applicable)
		Value based on the code list
Interest rate spread/margin	INTRST_RT_SPRD	The element is not reported (due to fixed interest rate)
Interest rate	ANNLSD_AGRD_RT	For example, 0.0000 if the minimum bid rate is 0.0%
		Mandatory



Accrued interest	ACCRD_INTRST	0.00 (when the interest rate is zero) Mandatory
Currency denomination	CRRNCY_DNMNTN	EUR Value based on the code list
Commitment amount on inception date	CMMTMNT_INCPTN	0.00 Mandatory
Outstanding nominal amount	OTSTNDNG_NMNL_AMNT	1234567.89 Mandatory
Off-balance sheet amount	OFF_BLNC_SHT_AMNT	The element is not reported Reported if there is an outstanding off-balance sheet amount
Default status of the instrument	DFLT_STTS	Reported if default status is assessed at the level of instrument instead of counterparty. Either the default status of the instrument or the default status of the counterparty must be reported.
Date of the default status of the instrument	DT_DFLT_STTS	Mandatory if the default status of the instrument is reported.
Arrears for the instrument	ARRRS	0.00 Mandatory
Date of past due for the instrument	DT_PST_D	The element is not reported
Transferred amount	TRNSFRRD_AMNT	0.00 Mandatory
Type of securitisation	TYP_SCRTSTN	7 (Non-securitised) Value based on the code list
Fair value changes due to changes in credit risk before purchase	FV_CHNG_CR_BFR_PRCHS	The element is not reported
Counterparty-instrument record		
Counterparty role	ENTTY_RL	At least three roles are always reported for a credit. As regards reserve deposits, the Bank of Finland is assigned the role 2 (debtor)



		Value based on the code list
Joint liability amount	JNT_LBLTY_AMNT	The element is not reported
Counterparty-instrument record		
Probability of default	PD	0.0001 (value between 0 and 1) Mandatory
Default status of the counterparty	DFLT_STTS	Reported if default status is assessed at the level of counterparty instead of instrument. Either the default status of the instrument or the default status of the counterparty must be reported.
Date of the default status of the counterparty	DT_DFLT_STTS	Mandatory if the default status of the counterparty is reported.
Accounting classification record		
Accounting classification of instruments	ACCNTNG_CLSSFCTN	14 (Cash balances at central banks and other demand deposits) Value based on the code list
Balance sheet recognition	RCGNTN_STTS	1 (Entirely recognised) Value based on the code list
Accumulated write-offs	ACCMLTD_WRTFFS	0.00 Mandatory
Accumulated impairment amount	ACCMLTD_IMPRMNT	≥ 0.00 *
Type of impairment	IMPRMNT_STTS	23 (Stage 1 (IFRS)) ** Value based on the code list
Impairment assessment method	IMPRMNT_ASSSSMNT_MTHD	(Impairment not deducted / Not applicable) Value based on the code list
Sources of encumbrance	SRC_ENCMBRNC	1 (No encumbrance) Value based on the code list
Accumulated changes in fair value due to credit risk	ACCMLTD_CHNGS_FV_CR	The element is not reported
Performing status of the instrument	PRFRMNG_STTS	N11 (Performing, not under probation)



		Value based on the code list
Date of the performing status of the instrument	DT_PRFRMNG_STTS	2010-01-01 Mandatory
Provisions associated to off-balance-sheet exposures	PRVSNS_OFF_BLNC_SHT	The element is not reported
Status of forbearance and renegotiation	FRBRNC_STTS	8 (Not forborne or renegotiated) Value based on the code list
Date of the forbearance and renegotiation status	DT_FRBRNC_STTS	2010-01-01 Mandatory
Cumulative recoveries since default	CMLTV_RCVRS_SNC_DFLT	The element is not reported
Prudential portfolio	PRDNTL_PRTFL	1 (Non-trading book) Value based on the code list
Carrying amount	CRRYNG_AMNT	1234567.89 Mandatory

14 REPORTING OF UNAUTHORISED DEBITS

The AnaCredit Manual does not have separate chapter for unauthorised debits, but instructions on reporting them are included elsewhere in the text, particularly in connection with the reporting of overdrafts. The place is logical in the sense that an unauthorised debit is reported using the instrument “overdraft”. Article 8.3.8 of Part 3 of the AnaCredit Manual presents a collection of information on unauthorised debits.

Unauthorised debits may be related to accounts with an overdraft facility. In the context of an overdraft account, an unauthorised debit refers to a situation where the debtor exceeds the credit line. In this case, the unauthorised debit is reported as part of the outstanding nominal amount and the off-balance sheet amount is zero. In other respects, this is reported as normally.

A current account not including a credit facility may be subject to an unauthorised debit. Normally, the balance on a current account is counted as the observed agent's liabilities and is not reported as a deposit. In the case of an unauthorised debit, the observed agent has a receivable from the customer, and the unauthorised debit should be reported as a credit using the instrument “overdraft”

There are not necessarily all credit data reporting attributes agreed for unauthorised debits. Therefore, in the Bank of Finland's schema, some attributes are not reported at all in connection with an unauthorised debit. If the same customer overdraws the same account for several times, the unauthorised



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debit must be reported using the same contract and instrument identifier even if the credit has been reported at times as exiting.

The counterparty reference record and the counterparty-instrument record are reported normally. The protection records are not reported.



Table 7. Example of an unauthorised debit in credit data reporting, assuming a customer with no defaults etc.

Counterparty reference record		
The counterparty reference record is reported based on the same rules as other counterparty data		
Instrument information record		
Contract identifier	CNTRCT_ID	Contract identifier
Instrument identifier	INSTRMNT_ID	Instrument identifier
Credit status	CRDT_STTS	1 (Continuing) Payment month 2
Instrument type	TYP_INSTRMNT	43 (overdrafts) 222 (Non-transferable overnight deposits, where the counterparty is a credit institution)
Revolving credit	RVLVNG_CRDT	The element is not reported; value 2 is used when reporting the element
Credit lines other than revolving credit	CRDT_LNS_OTH_RVLVNG_CRDT	The element is not reported; value 2 is used when reporting the element
Purpose	PRPS	11 (Other purposes)
Amortisation type	TYP_AMRTSTN	5 (Other)
Payment frequency	PYMNT_FRQNCY	15 (Other)
Syndicated loan	SYNDCTD_CNTRCT_TF	2 (Non-syndicated loan)
Syndicated contract identifier	SYNDCTD_CNTRCT_TF	The element is not reported
Fiduciary instrument	FDCRY	2 (Non-fiduciary instrument)
Project finance loan	PRJCT_FNNC_LN	2 (non-project finance loan)
Subordinated debt	SBRDNTD_DBT	2 (Non-subordinated debt)
Repayment rights	RPYMNT_RGHTS	1 (On demand or at short notice)
Recourse	RCRS	2 (No recourse)
Inception date	DT_INCPTN	Overdraft date
Settlement date	DT_STTLMNT	Overdraft date
Legal final maturity date	DT_LGL_FNL_MTRTY	The element is not reported.
Interest rate type	TYP_INTRST_RT	1 (Fixed), if a fixed penalty rate included in the contract applies, otherwise 0 (not applicable)
End date of interest-only period	DT_END_INTRST_ONLY	The element is not reported
Next interest rate reset date	DT_NXT_INTRST_RT_RST	The element is not reported
Interest rate reset frequency	INTRST_RT_RST_FRQNCY	0 (Not resettable or not applicable)
Interest rate cap	INTRST_RT_CP	The element is not reported
Interest rate floor	INTRST_RT_FLR	The element is not reported



Reference rate value	RFRNC_RT_V	0 (Not applicable)
Reference rate maturity	RFRNC_RT_V	0 (Not applicable)
Interest rate spread/margin	INTRST_RT_SPRD	The element is not reported
Interest rate	ANNLSD_AGRD_RT	Penalty interest rate or other interest rate
Accrued interest	ACCRD_INTRST	Interest accrued during the period between the overdraft date and the reporting reference date.
Currency denomination	CRRNCY_DNMNTN	Value based on the code list
Commitment amount on inception date	CMMTMNT_INCPTN	The element is not reported
Outstanding nominal amount	OTSTNDNG_NMNL_AMNT	Amount overdraft (same as overdue)
Off-balance sheet amount	OFF_BLNC_SHT_AMNT	The element is not reported
Default status of the instrument	DFLT_STTS	14 (Not in default)
Date of the default status of the instrument	DT_DFLT_STTS	Overdraft date
Arrears for the instrument	ARRRS	Amount overdraft (same as outstanding nominal amount)
Date of past due for the instrument	DT_PST_D	Overdraft date
Transferred amount	TRNSFRRD_AMNT	0.00
Type of securitisation	TYP_SCRTSTN	7 (Non-securitised)
Fair value changes due to changes in credit risk before purchase	FV_CHNG_CR_BFR_PRCHS	The element is not reported
Counterparty-instrument record		
Counterparty role	ENTTY_RL	At least three roles are always reported for a credit. As regards overdrafts, the counterparty is assigned the role 2 (debtor)
Joint liability amount	JNT_LBLTY_AMNT	The element is not reported
Counterparty-instrument record		
Probability of default	PD	Mandatory (value between 0 and 1)
Default status of the counterparty	DFLT_STTS	The element is not reported since the default status of the instrument is assessed.
Date of the default status of the counterparty	DT_DFLT_STTS	The element is not reported
Accounting classification record		



Accounting classification of instruments	ACCNTNG_CLSSFCTN	Value based on the code list
Balance sheet recognition	RCGNTN_STTS	1 (Entirely recognised)
Accumulated write-offs	ACCMLTD_WRTFFS	0.00
Accumulated impairment amount	ACCMLTD_IMPRMNT	0.00 or element not reported
Type of impairment	IMPRMNT_STTS	(Impairment not deducted or not applicable)
Impairment assessment method	IMPRMNT_ASSSSMNT_MTHD	(Impairment not deducted / Not applicable)
Sources of encumbrance	SRC_ENCMBRNC	1 (No encumbrance)
Accumulated changes in fair value due to credit risk	ACCMLTD_CHNGS_FV_CR	0.00 or element not reported
Performing status of the instrument	PRFRMNG_STTS	N11 (Performing, not under probation)
Date of the performing status of the instrument	DT_PRFRMNG_STTS	Overdraft date
Provisions associated to off-balance-sheet exposures	PRVSNS_OFF_BLNC_SHT	The element is not reported
Status of forbearance and renegotiation	FRBRNC_STTS	8 (Not forborne or renegotiated)
Date of the forbearance and renegotiation status	DT_FRBRNC_STTS	Overdraft date
Cumulative recoveries since default	CMLTV_RCVRS_SNC_DFLT	The element is not reported
Prudential portfolio	PRDNTL_PRTFL	1 (Non-trading book)
Carrying amount	CRRYNG_AMNT	Outstanding nominal amount + accrued interest

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Table 1. chema records and key identifiers linked to the templates of the AnaCredit Regulation

Table 2. Firm size

Table 3. Indicative connection of protection type and protection value type

Table 4. Connection of instrument classification to certain attributes

Table 5. Value and reporting of the attribute Credit status

Table 6. Example of a reserve deposit in credit data reporting, example values of attributes by record

89Table 7. Example of an unauthorised debit in credit data reporting, assuming a customer with no defaults etc.



15 IDENTIFIER MAPPING FILE

In case of any change to the identifiers, you must always contact the Bank of Finland in advance at luottotieto@bof.fi.

The AnaCredit Regulation requires that the unique identifiers used in credit data reporting:

- counterparty identifier
- contract identifier
- instrument identifier
- protection identifier

remain unchanged throughout all reporting periods. In practice, the identifiers may change for various reasons, but the continuity required by the Regulation must be preserved at all times.

The Bank of Finland has introduced a separate identifier mapping file to credit data reporting to ensure continuity. The file is submitted for a period when there is a change of identifiers.

Let us assume that a reporter changes the unique identifiers of a credit (both contract and instrument identifiers). The identifier mapping file is used to report the old and new identifiers for credits reported for the previous period with Credit Status code '1' (Continuing). In addition, credits reported for the previous period with the Credit Status code '3' (Exiting (written off)) are also reported in the file, unless the change takes place in January, April, July or October. A credit reported with the status '3' exits the reporting in the final report for the quarter.

The data reported for the contract identifier is described on the row:

```
< SRC_ID="old identifier" TGT_ID="new identifier" IdentifierType="Contract"
Action="Replace" >
```

The field "IdentifierType" involves a separate codelist "CL_MPPBL_IDNTFR_TYP_AC" containing the code values used:

- Counterparty
- Contract
- Instrument
- Protection.

The content of the last data item in an identifier mapping file is always "Replace".

The technical content of the identifier mapping table is provided on the Bank of Finland website in the reporting instructions titled "Credit data collection – Description of electronic reporting".