

16 January 2025

Regulation (EU) 2022/2554 on Digital Operational Resilience for the Financial Sector – Register of Information Reporting Timelines for Authorised Persons

This Circular is an update to Circular titled [Commission Implementing Regulation under Regulation \(EU\) 2022/2554 on Digital Operational Resilience for the Financial Sector Published in the EU Official Journal \[Update 2\]](#) published by the Authority in December 2024 which reported that the Implementing Technical Standard regarding the standard templates for the register of information, was adopted by the European Commission (access [here](#)). This circular is also an update to Circular titled [Regulation \(EU\) 2022/2554 on Digital Operational Resilience for the Financial Sector – Register of Information Reporting Timelines from Competent Authorities to the European Supervisory Authorities \('ESAs'\) and 2024 Dry Run ad hoc Exercise Outcomes Webinar](#) published by the Authority earlier, in November 2024.

Once the [DORA Regulation](#) becomes applicable (17 January 2025), pursuant to Article 28(3), financial entities shall maintain a Register of Information ('RoI') with information on all of their arrangements with ICT Third-Party Service Providers ('ICT TPPs') and upon request, make the full RoI available or, as requested, specific sections, along with any information deemed necessary to the competent authority.

On 4 December 2024, the European Supervisory Authorities (ESAs) published a [Joint Statement](#) with a clear expectation on financial entities falling within the scope of the DORA Regulation to prepare for the new reporting obligations with a particular reference to the RoI. The European Banking Authority (EBA) held a workshop for the industry on 18 December 2024, to share a summary of the Dry Run exercise and to discuss the preparations made for the 2025 RoI reporting, which was followed by a [Press Release](#) on 19 December 2024. All the relevant information regarding the Dry Run exercise, the summary, and the 2025 RoI reporting can now be found on the [Preparation for DORA Application](#) and [The EBA releases the technical package for its 4.0 reporting framework](#) pages on the EBA website.

In 2025, Authorised Persons falling within the scope of the DORA Regulation, shall submit their RoI to the Malta Financial Services Authority between **01 April 2025** and **08 April 2025 (both days included)**. This applies to all Authorised Persons that are authorised by the Authority up until and including **31 March 2025**. Any Authorised Person that is authorised after **31 March 2025** will not be included in the 2025 RoI reporting run but will still be required to maintain a RoI and make it available to the Authority upon request.

For the avoidance of doubt, the deadline(s) provided by this Circular further specify the requirement provided under Article 28(3) of the DORA Regulation and shall constitute the actual deadline(s) for submission of the Register of Information to the Authority. Failure to submit the full Register of Information from **01 April 2025** to **08 April 2025** may result in regulatory action by the Authority by virtue of the [DORA Regulation, LN 166 of 2024 and the MFSA Act](#).

With regards to the reporting procedure, the EBA has released the [Final Technical Package for its Reporting Framework 4.0](#) on 19 December 2024. Financial Entities can access the [Reporting Framework 4.0](#) on the EBA website to acquire the files required to complete the RoI. Furthermore, the Authority will be providing additional details regarding the completion and submission of the RoI for 2025.

The Authority shall communicate further instructions with regards to the RoI reporting of 2026 in due time.

Financial Entities may request further information by sending an email to the Register of Information Team at roi@mfsa.mt.