

## Template for comments

ECB Guideline on the supervisory approach by national competent authorities to coverage of non-performing exposures held by less significant supervised entities

Institution/Company
BankB NV

Contact person

Mr/Ms

First name

Surname

Email address

Telephone number

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General comments

## Template for comments

### ECB Guideline on the supervisory approach by national competent authorities to coverage of non-performing exposures held by less significant supervised entities

- Please enter all your feedback in this list.
- When entering feedback, please make sure that:
- each comment deals with a single issue only;
  - you indicate the relevant article/chapter/paragraph, where appropriate;
  - you indicate whether your comment is a proposed amendment, clarification or deletion.

Deadline: 27 October 2025

ID	Article	Paragraph	Type of comment	Detailed comment	Concise statement as to why your comment should be taken on board	Name of commenter	Personal data
1	Article 4	4	Amendment	Article 4 paragraph 3 gives derogation to assess NPE coverage towards certain individual exposures or portfolios whereby paragraph 4 gives some examples. We would like to see the following loans added to the specific circumstances list: Loans where insolvency procedures (e.g. bankruptcy, collective debt settlement, judicial settlement etc.) are ongoing.	Loans where insolvency procedures (e.g. bankruptcy, collective debt settlement, judicial settlement etc.) are ongoing is a special circumstanace, as the bank cannot take any action in such cases and must await the outcome of the procedures.	,	Don't publish