



## Template for comments

### ECB Guide on effective risk data aggregation and risk reporting

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#### General comments

Paragraph 3.5 “Group-wide data quality management and standards” highlights the importance of ensuring coherence among front office systems and reporting layer, as well as periodical reconciliations with other sources and reports.

Could you elaborate on recommended reconciliation typologies and frequencies ? Are there minimum expectations in place to ensure compliance in case of on-site inspections ? For instance:

- Are there reconciliations of paramount importance that can be considered mandatory ? Maybe Front Office Systems vs. General Ledger, General Ledger Accounts vs. Balance Sheet, or Balance Sheet vs. FINREP ?
- Is there a minimum frequency that can be deemed as sufficient ? For instance Balance Sheet vs. FINREP may be performed quarterly, whilst Front Office Systems vs. General Ledger should be daily ?

We think that these few additional information regarding implementing aspects may be helpful in order to fully address the requirements in scope properly.

