



Template for comments

ECB Guide on effective risk data aggregation and risk reporting

Institution/Company

Raiffeisen Bank International AG

Contact person

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First name

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General comments

Template for comments

ECB Guide on effective risk data aggregation and risk reporting

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 chapter/ section/ paragraph, where appropriate;
- you indicate whether your comment is a proposed amendment, clarification or deletion; and
- you include a rewording suggestion in case of a proposed amendment.

Deadline: 6 October, 2023

ID	Chapter/ section	Sub-point/ bullet/ paragraph	Page	Type of comment	Detailed comment	Concise statement as to why your comment should be taken on board	Name of commenter	Personal data
1	3.1 Responsibilities of the management body	5	5	Clarification	Is the Statement "Ensuring the implementation of the policies and standards for RDARR at the group level including a central independent Validation?"		Raiffeisen Bank International	
2	3.2 Sufficient scope of application		6	Clarification	How is the materiality threshold defined in order to comply with "framework should be applicable to all material legal entities"?	According to CRR reporting list currently consists of almost 150 group members (incl. Brancher) and some units are really very small. Therefore the threshold definition for materiality would help in implementation of BCBS 239 and avoid future discussion regarding coverage.	Raiffeisen Bank International	
3	3.2 Sufficient scope of application	1	C	Clarification	Supervisory reports that are submitted to financial supervisory or regulatory authorities. This includes, for instance, FINREP/COREP reporting templates, submissions to EBA/SSM stress test exercises and Pillar 3 disclosures. Does this need to comply from the first sending?	In case of new arising templates - especially in the case of ESG were the requirements are not always clear a fullfledged implementation does not make sense from the start	Raiffeisen Bank International	
4	3.3 Effective data governance framework	3	8	Clarification	The independent validation function must be existing in every consolidated "material" Unit (to consider the requirement of local regulator as well). What is the difference of the independent validation function on Group level and function of local Internal Audit?	The knowledge of local specifics is known in detail only on the local experts (IVF), therefore the Group IVF can not validate whether the local IVF assessment is performed properly unless an on-site review is performed but there we see a redundancy to reviews performed by local Internal Audit as 3rd line of defense.	Raiffeisen Bank International	

5	3.5 Group-wide data quality management and standards	4		Clarification	We consider EUC as a important tool to foster inovation within the bank before sustainable solutions are implemented - can you confirm that a reduction of EUC is not specifically enforced as long as the lifecycle is proper ensured		Raiffeisen Bank International	
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