

Luxembourg, le 15 avril 2026

Note d'information 26/3 du Commissariat aux Assurances par rapport à un contrôle supplémentaire unique du reporting DORA – Register of Information (ROI)

Dans le contexte du reporting annuel des « **DORA - Register of Information (ROI)** » et sur base de la collecte de données pour la désignation des « Fournisseurs tiers critiques (CTPP) » en 2025, les Autorités européennes de surveillance (AES) ont identifié plusieurs incohérences notamment en ce qui concerne les données relatives aux fournisseurs de services TIC tiers issues du tableau B.05.01.

Les AES viennent de ce fait d'effectuer un **contrôle supplémentaire unique** de la qualité de certaines données avec date de référence 31/12/2025 conformément à l'article 7(3) de « [ESA 2024 22](#) ».

Suite à la réception de ces nouvelles validations supplémentaires de la part des ESA, le Commissariat aux Assurances (CAA), en cas d'incohérences trouvées, vient de les transmettre aux entreprises d'assurance et de réassurance concernées via les canaux de transmission usuels SOFiE ou E-File et sous forme d'un **nouveau fichier feedback (FBV)** au format .xlsx dont le nom commence par « ROI...LU-99-20251231-... ».

Les entités concernées sont priées de corriger – le cas échéant – leur reporting ROI suite à la réception de ce nouveau fichier feedback unique et de renvoyer au CAA leur registre d'informations (ROI) corrigé via SOFiE ou E-File jusqu'au **30 avril 2026 au plus tard**.

A toutes fins utiles, l'**annexe** à cette note d'information reprend une liste des nouvelles validations des ESA, respectivement des erreurs possibles avec des explications.

Le Comité de Direction

Annex :

The tables below list all the validation checks, grouped by the type of data field, along with their error codes and descriptions.

Name Field Validation (Provider Names)

These checks ensure that the provider's name fields in table B.05.01 (legal name and its Latin alphabet version) are not filled with generic or placeholder text:

Code	Field	Trigger Condition	Error Message
E001	c0060 – Name of the ICT service provider (Latin alphabet)	<p>The value is a generic placeholder instead of a real name. Examples of the values (case-insensitive) the trigger this error: "NOT APPLICABLE", "N/A", "SA", "LTD", "INC", "SL", "GMBH", "CORP", "LLC", "NV", "PLC"...</p> <p>These are commonly just parts of a name or generic terms, not unique names, some of them likely result of a wrong formatting of the CSV file. The list was created by looking at the most frequently reported names and can be updated after receiving the new submissions.</p>	<p>The field includes an invalid value. This may be a legal-entity suffix (e.g., "LTD", "INC", "GmbH") or an inappropriate value such as "N/A".</p>
E002	c0050 – Legal name of the ICT service provider (as reported)	<p>Same condition as E001: a generic or placeholder value ("NA", "LTD", "N/A", etc.) is used in place of an actual legal name.</p>	<p>Generic value reported for the legal name of the third-party service provider.</p>
E021	c0050, c0060	<p>If the name columns contain a valid LEI code, this is likely a CSV parsing issue. Reported row should be checked.</p>	<p>Unexpected value reported for the name of the ICT service provider. Please check.</p>

Rationale: Generic terms like “LLC” or “N/A” in the name fields were observed frequently in 2025 data. They caused unrelated entities to be grouped together during analysis because many companies shared those generic names which the ESAs had to correct. By flagging these as errors (E001/E002), we ensure each reported name is specific to the provider.

Identification Code (Primary ID)

These checks apply to **c0010** in table B.05.01, the primary identification code of the third-party provider (this could be a LEI, an internal code, etc., as reported by the financial institution). This is a critical field for identifying and linking entities, so it has several validations:

Code	Field	Trigger Condition	Error Message
E003	c0010	This check identifies codes containing certain substrings or whole values that were deemed invalid in 2025 cleaning. Triggers include (case-insensitive): “DUMMY”, “INVALID”, “NOTAPPLICABLE”, “XXXX”, “EMPLOYER”, “12345”, “0”, “NONE”, “TRUE”, “FALSE”, “LEI”, “EUID”...	Invalid value reported for the identification code of the third-party service provider
E006	c0010	The code contains the substring “CRN” (which stands for Company Registration Number) but the overall length is not 20 characters. This indicates that the reporter likely included a code type in the code field (e.g., “CRN123456” or similar) instead of just the code. Proper reporting would put “CRN” in the code-type field (c0020) and the number in c0010. We chose length≠20 as a valid LEI is 20 characters and it can in theory include the “CRN” sequence.	Invalid value reported for the identification code of the third-party service provider. Please make sure that the type of the code (CRN) is reported in a dedicated field, and not as part of the code.
E009	c0010	The code contains the “#” character. Some banks concatenated code type and code with a hash (e.g., “VAT#12345”) in earlier submissions. The presence of “#” indicates the code includes extra information.	Invalid value reported for the identification code of the third-party service provider. Please make sure to report only the code, not including type of the code or special characters.

E012	c0010	<p>If the code length is less than 5 characters, excluding any non-alphanumeric values, it is unlikely to be a valid code. For example “AB1” or “123”. In 2025, any code under 5 characters was replaced with a unique placeholder because it was assumed invalid. Now we flag it for the reporter to review and correct.</p>	<p>Value reported for the identification code of the third-party service provider is too short.</p>
E013	c0010	<p>A valid LEI is reported in c0010, but the associated name (c0050 or c0060) does not match any of the names listed for that LEI in GLEIF. Matching is done after normalization (removing accents, suffixes like “Ltd”, etc.).</p>	<p>LEI code reported in the field c0010 does not correspond to the reported name of the third-party provider. Please check.</p>
E015	c0010	<p>A valid EUID is reported in c0010, but the associated name (c0050 or c0060) does not match any of the name associated with that EUID in BRIS. Matching is done after normalization (removing accents, suffixes like “Ltd”, etc.).</p>	<p>EUID code reported in the field c0010 does not correspond to the reported name of the third-party provider. Please check.</p>
E022	c0010	<p>If the reported primary ID is not a LEI or EUID, and it is used for different TPPs reported by different entities, it is likely not a correct ID that uniquely identifies the TPP.</p>	<p>The same ID was used for third-party providers with different names. Please check.</p>

Additional Identifier (Secondary ID)

The B05.01 template allows a second identifier for the provider (column **c0030**, with a code type in c0040). Similar quality issues were seen in c0030, though missing or invalid entries here are somewhat less critical than for c0010 (since c0030 is supplementary). However, generic or invalid values reported here can still lead to incorrect entity resolution.

Code	Field	Trigger Condition	Error Message
E004	c0030	The additional ID is invalid or placeholder text. This uses largely the same criteria as E003: if c0030 contains "DUMMY", "INVALID", "NOTAPPLICABLE" (substrings), or if it exactly equals "0", "NONE", "TRUE", "FALSE", "LEI", "EUID". Any such occurrences mean the secondary ID provided is not a true identifier.	Invalid value reported for the additional identification code of the third-party service provider.
E007	c0030	The value contains "CRN" and length is not 20 (indicating an embedded code type, similar to E006 logic). For example, "CRN876543" in c0030 would trigger this. The proper approach is to put code type in c0040 (code type for additional ID) and 876543 in c0030.	Invalid value reported for the additional identification code of the third-party service provider. Please ensure the code type (CRN) is in its own field, not part of the code.
E010	c0030	The value contains a "#" character, indicating a concatenation of code type and code. Any # in c0030 triggers this (e.g., a value like "TIN#556677").	Invalid value reported for the additional identification code of the third-party service provider. Please report only the code, not any special characters or combined type.

E014	c0030	A valid LEI is reported in c0030, but the associated name (c0050 or c0060) does not match any of the names listed for that LEI in GLEIF. Matching is done after normalization (removing accents, suffixes like “Ltd”, etc.).	LEI code reported in the field c0030 does not correspond to the reported name of the third party provider. Please check.
E016	c0030	A valid EUID is reported in c0030, but the associated name (c0050 or c0060) does not match any of the name associated with that EUID in BRIS. Matching is done after normalization (removing accents, suffixes like “Ltd”, etc.).	EUID code reported in the field c0030 does not correspond to the reported name of the third party provider. Please check.
E023	c0010	If the reported secondary ID is not a LEI or EUID, and it is used for different TPPs reported by different entities, it is likely not a correct ID that uniquely identifies the TPP.	The same ID was used for third party providers with different names. Please check.

Ultimate Parent Identifier

Column **c0110** in B05.01 is meant for the **ultimate parent undertaking's ID**. This field helps group providers under the same parent in the designation process. Data quality issues here can propagate into mis-grouping providers.

Code	Field	Trigger Condition	Error Message
E005	c0110	The parent ID value is invalid or generic. Triggers if c0110 contains "DUMMY", "INVALID", "NOTAPPLICABLE", or equals "0", "NONE", "TRUE", "FALSE", "LEI", "EUID" (case-insensitive, similar to E003/E004). If the reporting entity doesn't know the parent or it doesn't apply, this field should be left blank; providing one of these placeholders is incorrect. considered	Invalid value reported for the identification code of the third-party service provider's ultimate parent undertaking.
E008	c0110	Contains "CRN" but length ≠ 20, indicating an embedded code type (same rationale as E006/E007 but for the parent code).	Invalid value for the ultimate parent's identification code. The code type (CRN) should not be included in the code field.
E011	c0110	Contains "#" character, indicating an improper format (concatenated type or special char in the parent ID).	Invalid value reported for the identification code of the third-party service provider's ultimate parent undertaking – report only the code itself, without separators.

E018	c0110	A valid LEI is reported in c0010 or c0030, but the associated ultimate parent code (c0110) does not match the parent for this entity in GLEIF.	The reported identification code of the third-party service provider's ultimate parent undertaking does not correspond to the ultimate parent for this entity in GLEIF. Please check.
E019	c0110	Ultimate parent ID is not in line with the most frequently reported parent code for this entity. This will be run only if the check against GLEIF is not possible (no LEI available).	Ultimate parent ID is not in line with the most frequently reported code for this entity. Please check.

Country of the Third-party Service Provider’s Headquarter

The combination of the service provider's name and country is used in the entity resolution process, as relying solely on identification codes does not enable us to link entities reported under different types of identifiers. Therefore, it is essential to ensure that country codes are reported accurately and consistently. When an LEI or EUID is provided in columns c0010 or c0030, we have the possibility to verify the third-party provider's country through GLEIF or BRIS.

Code	Field	Trigger Condition	Error Message
E017	c0080	Valid LEI or EUID is reported, but the associated country code differs from the reference data (GLEIF/BRIS).	Reported country differs from the reference data for the reported identifier. Please verify consistency.

Value of Total Assets of the Financial Entity

The total assets of a financial entity (table B 01.02, c0010) serve as a key metric in evaluating the significance and role of third-party providers. Errors in these reported values may lead to inaccurate conclusions during criticality assessments. For credit institutions, this can be cross-referenced with the ITS data, whereas for other financial entities, only exceptionally low or high values can be identified.

Code	Field	Trigger Condition	Error Message
E020	c0110	Reported value of total assets significantly differs from the data available from other sources. When no data is available from other sources, implausibly low or high amounts will be flagged.	Unplausible amount reported for the total assets of the financial entity. Please check.