

16 April 2024

## Regulation (EU) 2022/2554 on Digital Operational Resilience for the Financial Sector: 'Dry-Run' 2024 *ad hoc* Exercise on the Data Collection of Registers of Information

This circular builds upon Circular titled [Regulation \(EU\) 2022/2554 and Amending Directive \(EU\) 2022/2556 on Digital Operational Resilience for the Financial Sector published on the EU Official Journal](#) published by the MFSA in January 2023. As detailed by the latter circular, Regulation (EU) 2022/2554 (the 'DORA Regulation') is to be supplemented by, *inter alia*, a series of Technical Standards and Guidelines.

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.

Amongst other purposes, the RoI allows financial entities to monitor their ICT TPP risk and the European Supervisory Authorities ('ESAs') to designate the Critical ICT TPPs which will be subject to an EU-level oversight framework pursuant to Chapter V Section II of the DORA Regulation.

According to Article 28(9) of the DORA Regulation, the RoI is to be supplemented by an Implementing Technical Standard that establishes a standard template. The latest draft version of such standard template can be found in the [Final Report on Draft Implementing Technical Standards on the standard templates for the purposes of the register of information in relation to all contractual arrangements on the use of ICT services provided by ICT third-party service providers under Article 28\(9\) of Regulation \(EU\) 2022/2554](#) (note that this Implementing Technical Standard is in the process of being adopted by the European Commission and it may be subject to change).

To facilitate and support the industry's preparations on the establishment, maintenance, and reporting of the RoI, in mid-2024, the ESAs and participating competent authorities including

the MFSA, are launching a 2024 'dry run' *ad hoc* exercise on the data collection of the RoI (hereinafter referred to as the 'Preparatory Exercise'). More details on the Preparatory Exercise can be found in the links provided below:

1. [European Banking Authority;](#)
2. [European Insurance and Occupational Pensions Authority;](#)
3. [European Securities and Markets Authority.](#)

Whilst participation in the Preparatory Exercise is voluntary, the MFSA encourages all financial entities within scope of the DORA Regulation to participate, as it will ultimately contribute towards compliance with the Regulation by its date of applicability. By participating in the Preparatory Exercise, financial entities can find support from competent authorities and the ESAs to build, to the extent possible, a DORA-compliant RoI, to test reporting processes, to address data quality issues and to improve internal processes.

Participation in this Preparatory Exercise is aligned with, and contributes towards, MFSA's minimum expectation sixteen (16), outlined in the letter released by the Authority in March 2024, titled [The Authority's Minimum Expectations in Relation to Financial Entities' Preparedness to Regulation \(EU\) 2022/2554 on Digital Operational Resilience](#). For ease of reference, minimum expectation sixteen (16) states:

*"Financial Entities that will fall within scope of the Regulation are expected to take steps towards developing a Register of Information ('RoI'), also taking into consideration the Implementing Technical Standard referred to in Article 28(9)".*

Financial Entities are **requested to indicate their participation** in the Preparatory Exercise by sending an email to the Supervisory ICT Risk and Cybersecurity ('SIRC') function within the Authority at [roi@mfsa.mt](mailto:roi@mfsa.mt) by not later than, **Friday 3 May 2024**.

To provide more information regarding the Preparatory Exercise, the ESAs invite financial entities to take part in an introductory workshop on **30 April 2024** from 10:00 to 12:00. The workshop will be held virtually, and interested parties are invited to **register by 25 April 2024** using the [following link](#).