

Paris, 08 July 2025



Mrs Maya ATIG

Director General
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THE DEPUTY SECRETARY GENERAL

ACPR-PUBLIC DOCUMENT

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Subject: Internal control report frameworks for the 2025 review period

Dear Mrs Atig,

The General Secretariat of the *Autorité de Contrôle Prudentiel et de Résolution* (SGACPR) is often called upon by institutions in the banking sector to clarify the nature of information they must include in their report on internal control, prepared in accordance with Articles 258 to 266 of the amended *Arrêté du 3 novembre 2014* on internal control. That report, as well as an excerpt from the minutes summarising the deliberations of the supervisory body, must indeed be sent to the SGACPR each year, by electronic transfer in office automation format, as set out in Articles 12 and 13 of Instruction No 2017-I-24, as amended, on the methods applicable for the submission of accounting documents, prudential information and other documents to the ACPR.

In order to facilitate the drafting of that report, please find attached, as was done last year, two framework templates designed to help credit institutions (CIs), investment firms (IFs) and financing companies (FCs) on the one hand, and payment institutions, account information service providers and electronic money institutions on the other hand, in structuring their report on internal control and substantiating its content.

These frameworks are provided for reference only, and internal control reports may be adapted, where appropriate, to align with the nature of the activities, risks and organisational arrangements of each institution. Institutions should, however, ensure that all elements listed in the templates are covered in their report on internal control, insofar as they are relevant to their individual circumstances.

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Overall, the changes made to the frameworks compared to last year are limited in scope. They mainly consist of:

- an added box in the preamble of the framework applicable to CIs/IFs/FCs to serve as a reminder that the consideration of environmental, social and governance (ESG) risk factors -through strategies, policies and monitoring and control arrangements- must be integrated, where relevant, across all sections of the report on internal control. As you know, in 2025, institutions will be required to implement the final adjustments necessary to comply with the new provisions set out in Directive (EU) 2024/1619 of the European Parliament and of the Council of 31 May 2024 ("CRD6") and in the guidelines issued by the European Banking Authority on 8 January 2025 (EBA/GL/2025/01) on ESG risk management;
- adjustments to the reporting requirements for operational risk to reflect the entry into force of European Regulation 2024/1623 of 31 May 2024 ("CRR3");
- the removal of certain items, such as intra-group transactions within financial conglomerates and the outcomes of "Supervisory outlier tests" for overall interest-rate risk, as they are now collected separately following the entry into force of relevant European delegated regulations;
- an update to Section III of the annex relating to the security of non-cash means of payment, to be submitted to the Banque de France or to the Institut d'Émission d'Outre-Mer (IEOM – the French overseas note-issuing bank), to integrate the latest recommendations issued by the Observatoire de la sécurité des moyens de paiement (OSMP – Observatory for the Security of Payment Means).

Lastly, and as was done last year, please find attached the template to be used for the annex dedicated to information and communication technology (ICT), which aims to further clarify the nature of the information expected by the supervisory authority. Please note that this annex only applies to institutions referred to in Article 2 of European Regulation 2022/2554 on digital operational resilience for the financial sector, known as the "DORA Regulation". In addition, it must be submitted to the SGACPR in office automation format, under the conditions set out in the aforementioned Instruction No 2017-I-24, as amended, by April 30 at the latest following the end of each financial year.

I kindly ask you to circulate this correspondence and the attached templates to the members of your association.

Please accept, Madam Director General, the assurance of my highest consideration.



Frédéric HERVO