



Paris, 18 August 2026



Mrs Maya ATIG
Director General
French Association of Credit Institutions and
Investment Firms
36, rue Taitbout
75009 PARIS
France

THE DEPUTY SECRETARY GENERAL

ACPR-PUBLIC DOCUMENT

Overseen by: Isabelle BARRÉ
Phone: +33142443899
E-mail : Isabelle.BARRE@acpr.banque-france.fr
Reference No: D-26-01733
External reference:
Delivery by e-mail

Subject: Internal control report frameworks for the 2026 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 the 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 2025-I-13 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.

The changes made to the frameworks compared to last year mainly consist of:

- the incorporation of the provisions of the *Arrêté du 29 juillet 2026* amending the *Arrêté du 3 novembre 2014* on the internal control of institutions in the banking, payment services and investment services sectors subject to supervision by the ACPR. This *Arrêté* incorporates the new

provisions resulting from the transposition of Directive 2013/36/EU ("CRD6") of the European Parliament and of the Council of 31 May 2013 amending Directive 2002/87/EC as regards supervisory powers, sanctions, third-country branches and ESG risks;

- the inclusion of information on intra-group transactions for financial conglomerates to supplement the data reported under Commission Implementing Regulation (EU) 2022/2454 of 14 December 2022 laying down implementing technical standards for the application of Directive 2002/87/EC of the European Parliament and of the Council with regard to supervisory reporting of risk concentrations and intra-group transactions;
- 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". Compared to last year, the members of your association are now required to:

- to outline the policy on encryption and cryptographic controls, as well as the techniques used, and the potential impact of the roll-out of new post-quantum technologies;
- with regard to the letter sent to you on 5 June 2026 concerning the emergence of new state-of-the-art artificial intelligence models, to detail all the measures implemented to address the increased risks that these models could entail.

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

Yours sincerely,

Frédéric HERVO