

GUIDELINES COMPLIANCE TABLE

Joint Guidelines on oversight cooperation under DORA (JC/GL/2024/36)

The following competent authorities comply or intend to comply with the Joint Guidelines on oversight cooperation under DORA (JC/GL/2024/36).

The guidelines' date of entry into application is 17 January 2025, while for guideline 5.1 compliance (i.e. reporting) will only be possible when the 1st reporting starts on 30 April 2025, as per the BoS decision. Similarly, for GL 1.6, compliance (i.e. using the secure tool) will only be possible when the tool is rolled out by the ESAs in 2025 Q3.

		Competent authority	Complies or intends to comply	Comments
Member States				
AT	Austria	Financial Market Authority (FMA)	Yes	ESMA Guidelines and other Convergence Instruments - FMA Österreich ESMA-Leitlinien und andere Konvergenzinstrumente - FMA Österreich
BE	Belgium	Financial Services and Markets Authority (FSMA)	Yes	The FSMA complies with the guidelines and takes them into account as a part of its supervisory practice.
BG	Bulgaria	Financial Supervision Commission (FSC)	Yes	The FSC complies with the guidelines and takes them into account as a part of its supervisory practice. In addition, the FSC Board's Decision from 14.01.2025 is available under the FSC website:

		Competent authority	Complies or intends to comply	Comments
				https://www.fsc.bg/wp-content/uploads/2025/01/13.pdf (available only in Bulgarian)
HR	Croatia	Hrvatska agencija za nadzor financijskih usluga (HANFA)	YES	https://www.hanfa.hr/vijesti/obavijest-subjektima-nadzora-o-primjeni-zajednickih-smjernica-o-suradnji-u-podrucju-nadzora-i-razmjeni-informacija-izmedu-europskih-nadzornih-tijela-i-nadleznih-tijela-na-temelju-uredbe-eu-20222554-icgl202436/
CY	Cyprus	Cyprus Securities and Exchange Commission (CySEC)		Non-compliance by default, pending designation by the Member State of the Competent Authority for the jurisdiction. Whilst the legislative process including the designation of competent authorities in Cyprus is still on-going, the CySEC will already update its procedures and systems to ensure alignment with the guidelines and to be fully prepared for their adoption. The CySEC will take the GLs into account as a part of its supervisory practice.
CZ	Czech Republic	Czech National Bank (CNB)	Yes	https://www.cnb.cz/cs/dohled-financni-trh/legislativni-zakladna/digitalni-provozni-odolnost/metodicke-a-vykladove-materialy/ https://www.cnb.cz/en/supervision-financial-market/legislation/digital-operational-resilience/methodological-and-interpretative-documents/
DK	Denmark	Finanstilsynet	Yes	Finanstilsynet complies with the guidelines and takes them into account as a part of its supervisory practice.
EE	Estonia	Finantsinspektion	Yes	https://www.fi.ee/et/juhendid/pangandus-ja-krediit/euroopa-

		Competent authority	Complies or intends to comply	Comments
				jarevalveasutuste-uhissuuniste-jarevalvealase-koostoo-ja-teabevahetuse-kohta-euroopa
ES	Spain	Comisión Nacional del Mercado de Valores (CNMV)	Yes	The CNMV complies with the guidelines and takes them into account as a part of its supervisory practice. In addition, these guidelines have been published on the CNMV website in the legislation section.
FI	Finland	Finanssivalvonta (FSA)	Yes	The concrete measures taken in Finland consist of adding a new section 3 f) to the Finnish Act on the Financial Supervision Authority (878/2008) on cooperation between authorities to promote cyber security and resilience.
FR	France	Autorité des Marchés Financiers (AMF)	Yes	https://www.amf-france.org/en/news-publications/news/operational-resilience-amf-applies-joint-guidelines-oversight-cooperation-and-information-exchange
DE	Germany	BaFin	Yes	General commitment to ESA guidelines on our website (if not stated otherwise for a particular guideline, ESA guidelines are to be implemented) Link to BaFin's DORA landing page (guidelines are to be implemented directly)
EL	Greece	Hellenic Capital Market Commission (HCMC)	Yes	HCMC issues a press release informing the public that the guidelines are to be incorporated into the supervisory practices of the HCMC once the law incorporating DORA is adopted with a retroactive effect.
HU	Hungary	Magyar Nemzeti Bank (MNB)	Intends to comply	The MNB prepares a dedicated internal procedure to implement and detail all the CTPP oversight related tasks and procedures defined by DORA and its second level regulations for NCAs. To complete and finalise the internal procedure, the MNB is waiting for the

		Competent authority	Complies or intends to comply	Comments
				finalisation of the other oversight related deliverables such as the RTS specifying the criteria for determining the composition of the joint examination team (JET), Mandate of the Oversight Forum etc. The MNB intends to comply with the Joint Guidelines until 30.06.2025 at the latest.
IE	Ireland	Central Bank of Ireland	Yes	The CBI complies with the guidelines and takes them into account as a part of its supervisory practice.
IT	Italy	Commissione Nazionale per le Società e la Borsa (CONSOB)	Yes	https://www.consob.it/web/consob-and-its-activities/news-in-detail/-/asset_publisher/kcxIUuOyjO9x/content/consob-notice-of-23-january-2025/718268
LV	Latvia	Financial and Capital Market Commission (FCMC)	Yes	The Financial Market Supervision Committee on March 18, 2025 took a Decision on the application of the Joint Guidelines on the oversight cooperation and information exchange between the ESAs and the competent authorities under Regulation (EU) 2022/2554 This decision has been published at Lietuvos bankas web site - 51155_1257beb57778ab53e543be5bb12f9afb.pdf
LT	Lithuania	Bank of Lithuania	Yes	The Bank of Lithuania complies with the guidelines and takes them into account as a part of its supervisory practice.
LU	Luxembourg	Commission de Surveillance du Secteur Financier (CSSF)	Yes	The CSSF complies with the guidelines and takes them into account as a part of its supervisory practice.
MT	Malta	Malta Financial Services Authority (MFSA)	Yes	The MFSA complies with the guidelines and takes them into account as a part of its supervisory practice.

		Competent authority	Complies or intends to comply	Comments
NL	Netherlands	Autoriteit Financiële Markten (Authority for the Financial Markets)	Yes	The Guidelines are directly applied in AFM's supervision.
PL	Poland	Komisja Nadzoru Finansowego (KNF)	Intends to comply	The KNF complies with the guidelines 1-10. On 31 December, the UKNF issued a statement on the application by financial entities of DORA Regulation. As for the guidelines 11 and 12 the compliance date is dependent on the previous endorsement and application of the national act to amend certain laws in connection with ensuring the digital operational resilience of the financial sector and the issuance of European green bonds, that contains provisions for the application of Regulation 2022/2554 and which will provide UKNF with explicit legal grounds to take a decision referred to in Article 42.6 of Regulation 2022/2554. The legislation was expected to be adopted in the 1Q of 2025 – currently is subject of work by the judiciary committee (Government Legislation Centre).
PT	Portugal	Comissão do Mercado de Valores Mobiliários (CMVM)	Intends to comply	<p>CMVM intends to comply with the Guidelines, such time as the necessary legislative and regulatory proceedings have been completed, considering that the National Law implementing DORA and CMVM regulation on information reporting duties (incidents and content of the contracts with testing, inspection and certification (TIC) services providers) are yet to be published. Please find attached CMVM's compliance notification form regarding the Joint Guidelines on oversight cooperation under DORA, which have been published on the CMVM Website.</p> <p>The CMVM is already working on alternative means for submission of the relevant reports required by DORA in line with the content and formats defined in European</p>

	Competent authority	Complies or intends to comply	Comments
			<p>legislation, and communicated to the financial entities subject to CMVM's supervision through its website (please refer to the following link https://www.cmvm.pt/PInstitucional/Content?Input=BB04D09564D409A25E340AD82EF32DDDD642D3BEB0DA6ABE6ED8124C1DBBFB0E), and subsequently by email, with more operational details enabling due reporting compliance under DORA of incidents and content of the contracts with testing, inspection and certification (TIC) services providers, until the national legislative and regulatory proceedings have been completed.</p>
RO	Romania Romanian Financial Supervisory Authority (ASF)	Intends to comply	<p>RO ASF intends to comply with the Guidelines by March 2025, please note that ASF shall draft an internal work procedure, planned to be adopted at the latest end of March 2025, which will ensure the full compliance with the guidelines, comprising at least the rules for:</p> <ul style="list-style-type: none"> - the establishment and functioning of the single point of contact for the exchange of information, dedicated email address with secure and restricted access; - determining the entire internal workflow from the moment of receipt of the registers of information to its transmission to the ESAs; - the exchange of information obtained in the supervision process for the evaluation of the critical character of the third party provider; - related to the JETs; - the collaboration aspects between ASF and the Lead Overseer. <p>ASF has also already published on its website the Romanian version of the Guidelines, in order to be available to the markets.</p>

		Competent authority	Complies or intends to comply	Comments
				Moreover, ASF shall conclude a protocol with the National Directorate for Cybersecurity (DNSC) (which is the national competent authority under NIS2) for the cooperation between ASF and DNSC on all matters related to DORA, including the exchange of information. The protocol will also contain provisions for the exchange of information between ASF and ESAs regarding the information obtained from the exchange of information with DNSC.
SK	Slovakia	National Bank of Slovakia (NBS)	Yes	https://nbs.sk/dohlad-nad-financnym-trhom/legislativa/legislativa/detail-dokumentu/usmernenia-esma-z-21-augusta-2024-c-esma34-1592494965-657-pre-nazvy-fondov-v-ktorych-sa-pouzivaju-vyrazy-suvisiace-s-esg-alebo-udrzatelnostou/ https://nbs.sk/en/dohlad-nad-financnym-trhom/legislativa/legislativa/detail-dokumentu/esma-guidelines-of-21-august-2024-no-esma34-1592494965-657-guidelines-on-funds-names-using-esg-or-sustainability-related-terms/
SI	Slovenia	Securities Market Agency (SMA)		<p>Non-compliance by default, pending designation by the Member State of the Competent Authority for the jurisdiction.</p> <p>The SMA intends to comply with the guidelines on the day, the law which determines the SMA as a competent authority for DORA Regulation, comes into force.</p>
SE	Sweden	Finansinspektionen (FI)	Yes	https://www.fi.se/sv/publicerat/nyheter/2024/fi-foljer-riktlinjer-om-

Competent authority			Complies or intends to comply	Comments
				tillsynssamarbete-och-informationsutbyte/
EEA EFTA States **				
IS	Iceland	Central Bank of Iceland	Intends to comply	Intends to comply when necessary legislative or regulatory proceedings have been completed DORA is expected to be implemented into Icelandic legislation in the second half of 2025.
LI	Liechtenstein	Finanzmarktaufsicht (FMA)	Yes	https://www.fma-li.li/de/regulierung/regulierungen-der-europaischen-aufsichtsbehorden/guidelines.html
NO	Norway	Finanstilsynet	No reply	

* Please note that, in the interest of transparency, if a competent authority continues to intend to comply after the application date, it will be considered “non-compliant” unless (A) the Guidelines relate to a type of institution or instruments which do not currently exist in the jurisdiction concerned; or (B) legislative or regulatory proceedings have been initiated to bring any national measures necessary to comply with the Guidelines in force in the jurisdiction concerned.

** The competent authorities of the EEA States other than the Member States of the European Union are required to notify their compliance with ESMA’s guidelines or recommendations relating to a legal act that has been incorporated in the EEA Agreement. This compliance table reports on guidelines relating to Regulation (EU) 2022/2554 and Directive (EU) 2022/2556, which have been incorporated in the EEA Agreement.

Notes

Article 16(3) of Regulation (EU) No 1095/2010 (the ESMA Regulation) requires national competent authorities to inform us whether they comply or intend to comply with each Guideline or recommendation we issue. If a competent authority does not comply or does not intend to comply it must inform us of the reasons. We decide on a case by case basis whether to publish reasons.

ESMA endeavours to ensure the accuracy of this document, however, the information is provided by the competent authorities and, as such, ESMA cannot accept responsibility for its content or any reliance placed on it.

For further information on the current position of any competent authority, please contact that competent authority. Contact details can be obtained from our website (www.esma.europa.eu).