22 July 2026
ESMA02-1812230391-17874

Annual Accounts 2025

Accounting Officer's Certificate

on the Annual Accounts

I acknowledge my responsibility for the preparation and presentation of the annual accounts of the European Securities and Markets Authority in accordance with Article 102 of the Framework Financial Regulation[1].

I hereby certify that the annual accounts of ESMA for the year 2025 have been prepared in accordance with Title IX of the Framework Financial Regulation and the accounting rules adopted by the Commission's Accounting Officer, as are to be applied by all the institutions and Union bodies.

I have obtained from the Authorising Officer, who certified its reliability, all the information necessary for the production of the accounts that show the European Securities and Markets Authority's assets and liabilities and the budgetary implementation.

Based on this information and on such checks as I deemed necessary to sign off the accounts, I have a reasonable assurance that the accounts present fairly, in all material aspects, the financial position, the results of the operations and the cash-flow of ESMA.

Paris, 3 June 2026

[signed]

Jordi Climent-Campins
Accounting Officer

[1] COMMISSION DELEGATED REGULATION (EU) 2019/715 of 18 December 2018 on the framework financial regulation for the bodies set up under the TFEU and Euratom Treaty and referred to in Article 70 of Regulation (EU, Euratom) 2018/1046 of the European Parliament and of the Council.

Contents

Abbreviations

ABAC	Accrual Based Accounting (accounting system used at ESMA)
BoS	Board of Supervisors
(TC) CCP	(Third Country) Central Counterparty
CRA	Credit Rating Agency
CTPs	Consolidated Tape Providers
CTPPs	Critical ICT third-party service providers
DORA	Digital Operational Resilience Act
DRSP	Data Reporting Service Provider
EBA	European Banking Authority
EC	European Commission
EFTA	European Free Trade Association
EIOPA	European Insurance and Occupational Pensions Authority
EMIR	European Market Infrastructure Regulation
ESAs	European Supervisory Authorities
ESG	Environmental, Social and Governance
(DG) FISMA	Directorate-General for Financial Stability, Financial Services and Capital Markets
FTE	Full-time equivalent
ICT	Information and communication technologies
IPSAS	International Public Sector Accounting Standard
LFS	Legislative Financial Statement
MB	Management Board
MiCA	Markets in Crypto-Assets
MiFIR	Markets in Financial Instruments Regulation
NCA	National Competent Authority
RAL	Reste à Liquider (share of a committed amount not yet paid)
REFORM (SG)	Secretariat-General for Reform and Investment Task Force
RIS	Retail Investment Strategy
SaaS	Software as a Service
SDFA	Supervisory Digital Finance Academy
SFTR	Securities Financing Transactions Regulation
SLA	Service Level Agreement
SNE	Seconded National Expert
SR	Securitisation Repository
STS	Simple, Transparent and Standardised securitisations
TR	Trade Repository

Background information

Introduction

The European Securities and Markets Authority (the “Authority” or “ESMA”) was established by Regulation (EU) No 1095/2010 of the European Parliament and of the Council of 24 November 2010 establishing a European Supervisory Authority (ESMA), amending Decision No 716/2009/EC and repealing Commission Decision 2009/77/EC.

Regulation (EU) 2019/2175 of the European Parliament and of the Council, amending Regulation (EU) No 1095/2010 and strengthening the role and powers of the European Supervisory Authorities, was published on 27 December 2019 and became applicable as from 1 January 2020.

The accounts of the Authority are kept in accordance with the Decision on the Financial Regulation of the European Securities and Markets Authority, as adopted by its Management Board, and its Implementing Rules.

The annual accounts, together with the reports on the implementation of the budget of the Authority, have been drawn up in accordance with Article 70 of Regulation (EU, Euratom) 2018/1046 of the European Parliament and of the Council of 18 July 2018 on the financial rules applicable to the general budget of the Union, and Article 98 of the Decision on the Financial Regulation of ESMA.

Legal status and principal office

The Authority is a body of the Union within the meaning of Article 70 of Regulation (EU, Euratom) 2018/1046. It has legal personality.

The Authority is represented by its Chair, Ms Verena Ross, who is appointed by the Council after confirmation by the European Parliament. The day-to-day management of the Authority is entrusted to the Executive Director, Ms Natasha Cazenave, who is appointed by the Board of Supervisors after confirmation by the European Parliament.

The headquarters of the Authority are located at 201–203 rue de Bercy, Paris, France.

The Protocol on the Privileges and Immunities of the European Union applies to the Authority.

Governing structure

The Board of Supervisors and the Management Board are the Authority's main decision-making bodies.

The Board of Supervisors is composed of the heads of the national authorities competent for the supervision of financial markets in each EU Member State and the Chair of ESMA. Representatives of the European Commission, the European Banking Authority, the European Insurance and Occupational Pensions Authority and the European Systemic Risk Board participate as non-voting members. The heads of the national competent authorities from Iceland, Norway and Liechtenstein, as well as a representative of the EFTA Surveillance Authority, also participate as non-voting members.

The Board of Supervisors provides strategic direction and guidance for the work of the Authority and is responsible for taking the key decisions relating to ESMA's mandate.

The Management Board is composed of the Chair and six members elected from among the members of the Board of Supervisors. The Executive Director and a representative of the European Commission participate as non-voting members, while the Vice-Chair attends meetings as an observer. The Management Board ensures that the Authority carries out its mission and performs the tasks assigned to it, and exercises specific powers in relation to budgetary, administrative and supervisory matters.

Both the Board of Supervisors and the Management Board are chaired by the Chair of the Authority. The Executive Director is responsible for the management of the Authority.

Highlights of the year

During the financial year 2025, several significant developments had an impact on ESMA's financial statements:

- In 2025, ESMA delivered a strong set of policy, supervisory and operational achievements, with a clear emphasis on simplification and burden reduction, initiatives to streamline regulatory reporting, the advancement of its Digital Strategy, the selection of the first EU consolidated tape providers under MiFIR, and active support for the transition to a T+1 settlement cycle. The year also marked the full deployment of the MiCA framework, the operationalisation of the DORA oversight framework through the designation of critical ICT third-party providers, implementation of the EMIR 3 requirements and the completion of the tiering and recognition of UK CCPs. Together, these milestones strengthened supervisory convergence, enhanced market transparency and resilience, and supported a more integrated and efficient EU capital markets framework.
- These achievements were delivered amid a sustained high operational workload, as ESMA continued implementing its 2023–2028 multi-annual strategy in alignment with the European Commission's priorities under the Savings and Investment Union (SIU). In parallel, ESMA

devoted significant efforts to preparing for new and expanded mandates, notably the revised Benchmark Regulation, the European Green Bond Regulation and the ESG Rating Regulation, ensuring its readiness for their effective and timely implementation in the years ahead.

- ESMA recognised new revenue streams arising from the implementation of recently conferred mandates, notably EUR 581 731 relating to the Digital Operational Resilience Act (DORA) and EUR 1 378 251 relating to the MiCA Common Monitoring Tool delegated project. The Authority also began levying fees under the DRSP CTP mandate, which in 2025 amounted to EUR 100 000.
- The signature of a renegotiated lease agreement, aimed at achieving financial savings through a reduction in rented office space and the securing of stable and advantageous rental conditions led to a revision of the release schedule for existing lease incentives.
- ESMA made a pre-financing payment for Cloud Brokering services in connection with the development of the European Single Access Point (ESAP) and BIGDA projects. This pre-financing payment enabled the Authority to benefit from advantageous discounted rates, thereby optimising the use of budgetary resources.
- On 29 October 2025, the General Court of the European Union dismissed the applicant's claims in Case T-750/22, *UniSystems Luxembourg and Unisystems systimata pliroforikis v ESMA*. Consequently, the contingent liability previously disclosed in relation to this case has been removed from the 2025 annual accounts.

Further information sources

Further information on the Authority's administrative and operational activities, organisational structure, applicable legislation, and the composition of the Board of Supervisors and the Management Board is available on the Authority's website (https://www.esma.europa.eu) and in its annual report.

Financial Statements

Statement of Financial Position

	Note	2025	2024 (restated)
ASSETS			
Non-current Assets			
Intangible fixed assets	**II.1.a**		
Computer software		3,350,022	3,513,511
Tangible fixed assets	**II.1.b**		
Plant and equipment		-	-
Computer hardware		2,459	15,713
Furniture		161,853	209,925
Fixtures, fittings and other		1,495,112	2,784,520
Other non-current assets			
Long term receivables	II.1.c	-	288,900
Total		**5,009,446**	**6,812,569**
Current Assets	**II.2**		
Current receivables	II.2.a	1,142,629	1,731,450
Sundry receivables	II.2.b	9,243,992	2,222,776
Deferred charges and accrued income	II.2.c	5,964,497	4,775,635
Cash and cash equivalents	II.2.d	2,032,990	869,823
Total		**18,384,107**	**9,599,683**
TOTAL ASSETS		**23,393,553**	**16,412,252**
LIABILITIES			
Non-current Liabilities			
Long term payables	II.1.c	-	288,900
Deferred revenue	II.4	1,042,290	2,304,266
Total		**1,042,290**	**2,593,165**
Current Liabilities			
Current payables	II.5.a	6,356,483	3,188,549
Payables towards consolidated entities	II.5.c	3,607,948	2,814,799
Deferred revenue	II.4	1,982,591	854,250
Total		**11,947,022**	**6,857,598**
TOTAL LIABILITIES		**12,989,312**	**9,450,763**
TOTAL NET ASSETS		**10,404,241**	**6,961,489**

Statement of Financial Performance

	Note	2025	2024 (restated)
OPERATING RESULT			
Operating revenue	**III.1**		
Subsidy from the Member States		33,099,187	30,041,495
Subsidy from EFTA countries		1,024,743	930,077
EU Balancing subsidy		21,829,490	19,842,611
Fees from supervised entities		26,610,637	23,678,866
NCA contribution to IT delegated projects		610,891	329,862
Foreign currency conversion gains		1,742	1,122
Other miscellaneous revenue		1,809,280	794,786
Total		**84,985,969**	**75,618,819**
Operating Expenses	**III.2**		
Staff expenses	III.2.a	55,563,383	52,919,553
Building and related expenses	III.2.b	7,003,103	6,343,909
Other expenses	III.2.c	16,124,917	18,014,855
Depreciation and amortisation	III.2.d	2,878,670	2,330,286
Foreign currency conversion losses		1,324	878
Total		**81,571,398**	**79,609,481**
OPERATING RESULT		**3,414,572**	**(3,990,662)**
NON-OPERATING RESULT	**III.3**		
Financial revenue		28,879	12,285
Financial expenses		698	1,099
NON-OPERATING RESULT		**28,180**	**11,186**
Result from Ordinary Activities		**3,442,752**	**(3,979,475)**
Result from Extraordinary items		**-**	**-**
ECONOMIC RESULT FOR THE YEAR		**3,442,752**	**(3,979,475)**

Cashflow Statement

	2025	2024 (restated)
CASHFLOW FROM ORDINARY ACTIVITIES		
Surplus/(Deficit) from ordinary activities	**3,442,752**	**(3,979,475)**
Depreciation and amortisation	2,878,670	2,330,286
Increase/(decrease) in provisions	-	-
(Increase)/decrease in receivables	(7,332,358)	4,067,970
Increase/(decrease) in accounts payable	2,879,033	(1,404,026)
Increase/(decrease) in liabilities to cons. entities	793,149	2,059,496
Increase/(decrease) in deferred revenue	(133,634)	(1,233,386)
Net cashflow from operating activities	**2,527,613**	**1,840,864**
CASHFLOW FROM INVESTING ACTIVITIES		
(Increase)/decrease in fixed assets	(1,364,446)	(973,034)
Net cashflow from investing activities	**(1,364,446)**	**(973,034)**
OTHER	**-**	**57**
NET INCREASE/(DECREASE) IN CASH	**1,163,167**	**867,887**
Cash at the beginning of the period	**869,823**	**1,935**
Cash at the end of the period	**2,032,990**	**869,823**

Statement of Changes in Net Assets

	Capital	Reserves		Accumulated equity	Economic result of the year	Total Net Assets
		Fair value	Other			
Balance as at 31 December 2024 (restated)		**-**	**-**	**10,940,964**	**(3,979,475)**	**6,961,489**
Changes in accounting policies		-	-	-	-	-
Balance at 1 January 2025 (restated)		**-**	**-**	**10,940,964**	**(3,979,475)**	**6,961,489**
Allocation of the result of 2024		-	-	(3,979,475)	3,979,475	-
Economic result for the year		-	-	-	3,442,752	**3,442,752**
Balance as at 31 December 2025		**-**	**-**	**6,961,489**	**3,442,752**	**10,404,241**

Notes to the Financial Statements

I. Significant accounting policies

1. Accounting principles

The annual accounts of the European Securities and Markets Authority comprise the financial statements and the reports on the implementation of the budget.

The objective of the annual accounts is to provide information on the Authority's financial position, financial performance and cash flows that is useful to a wide range of users for accountability and decision-making purposes.

The accounting principles applied in the preparation of the financial statements are laid down in EU Accounting Rule 1 *Financial Statements* and are consistent with the requirements of IPSAS 1 *Presentation of Financial Statements*. These principles include fair presentation, the accrual basis of accounting, the going concern assumption, consistency of presentation, materiality, aggregation, offsetting, prudence and the presentation of comparative information. The qualitative characteristics of financial reporting are relevance, faithful representation, understandability, timeliness, comparability and verifiability.

The financial statements recognise all income and expenses for the financial year on an accrual basis, in accordance with the EU Accounting Rules, and present the financial position of the Authority through a statement of financial position as at 31 December.

The budgetary accounts provide a detailed picture of the implementation of the budget. They are prepared based on a modified cash accounting principle.

Application of new and amended European Union Accounting Rules

<u>New EAR which are effective for annual periods beginning on or after 1 January 2025</u>

On 12 December 2025 the Accounting Officer of the European Commission adopted a targeted amendment of EAR 1 'Financial Statements'. The amendment, which is effective for reporting periods beginning on or after 1 January 2025, introduced changes to the guidance on the Segment Report. As ESMA is not obliged to, and does not prepare, a Segment Report, the amendment has no impact on these annual accounts.

New EAR adopted but not yet effective at 31 December 2025

EAR 8 – Leases (revised 2025)

On 15 April 2025 the Accounting Officer of the European Commission adopted the revised EAR 8 ‘Leases’, which is effective for accounting periods beginning on or after 1 January 2027. The revised EAR 8 has been updated in line with IPSAS 43 ‘Leases’ (including the amendment ‘Concessionary Leases and Other Arrangements Conveying Rights over Assets’). The main change as compared to the current EAR 8 is the introduction of a right-of-use recognition and measurement model, which requires lessees to recognise all leases, including concessionary leases, on the balance sheet, unless the short-term or low-value exemption applies. The current distinction of leases as either operating leases or finance leases, with only the latter recognised on the balance sheet, will no longer be applicable. For lessors, the revised EAR 8 largely carries forward the existing accounting requirements, with additional guidance and clarifications. Consequently, the initial application of the revised EAR 8 is expected to result in more leases being recognised on the balance sheet, with a corresponding increase in right-of-use assets and lease liabilities. The impact of the revised EAR 8, including on concessionary leases and other relevant arrangements, will continue to be assessed over the 2026 calendar year prior to the 1 January 2027 effective date.

EAR 1 – Financial Statements (revised 2025)

On 15 April 2025 the Accounting Officer of the European Commission adopted the amended EAR 1 ‘Financial Statements’, which is effective for accounting periods beginning on or after 1 January 2027. The objective of the amendment is to ensure a consistent classification of all borrowings within financing activities. Under the current EAR 1 borrowings related to leases, the acquisition of property, plant and equipment, and back-to-back operations are classified within operating activities. Under the revised EAR 1, financing activities will include all activities that result in changes on the size and composition of borrowings, without the above exceptions. Consequently, the initial application of the revised EAR 1 is expected to result in cash flows relating to the principal portion of lease liabilities to be classified within financing activities rather than operating activities. The impact of the revised EAR 1 will continue to be assessed over the 2026 calendar year prior to the 1 January 2027 effective date.

2. Basis of preparation

The financial statements are prepared on a going concern basis, as there is no indication that the Authority will not continue to operate in its current form for at least twelve months from the date of approval of these accounts. The reporting period covers 1 January to 31 December.

Functional and reporting currency

The euro (EUR) is the functional and reporting currency of the Authority. Amounts presented in the financial statements are expressed in euro, unless stated otherwise. Differences may arise due to rounding.

Currency and basis for conversion

Foreign currency transactions are translated into euro using the exchange rates prevailing at the dates of the transactions. Foreign exchange gains and losses resulting from the settlement of such transactions, and from the retranslation at year-end exchange rates of monetary assets and liabilities denominated in foreign currencies, are recognised in the statement of financial performance.

Non-monetary assets, including property, plant and equipment and intangible assets, are recorded at historical cost and remain valued at the exchange rate applicable on the date of acquisition.

At year-end, monetary assets and liabilities denominated in foreign currencies are translated into euro using the European Central Bank exchange rates applicable at 31 December.

Use of estimates

In accordance with IPSAS and the EU Accounting Rules, the preparation of the financial statements requires management to make estimates and assumptions based on the most reliable information available. These estimates affect the reported amounts of assets, liabilities, income and expenses.

Significant estimates relate to provisions, receivables, accrued income and charges, contingent assets and liabilities, and the impairment of property, plant and equipment and intangible assets. Actual results may differ from these estimates. Changes in estimates are recognised in the period in which they become known.

3. Statement of financial position

Non-current assets

Non-current assets comprise property, plant and equipment and intangible assets acquired since 1 January 2011 and still in use at the reporting date.

Internally generated intangible assets are capitalised when a project has been authorised by the Management Board, the asset meets the recognition criteria laid down in the EU Accounting Rules, and the capitalisable amount exceeds EUR 480 000. Capitalised costs include all directly attributable development costs necessary to create and prepare the asset for its intended use. Research costs, non-capitalisable development costs and maintenance costs are recognised as expenses when incurred.

Property, plant and equipment are measured at historical cost less accumulated depreciation and impairment losses. Historical cost includes expenditure directly attributable to the acquisition or construction of the asset. Subsequent expenditure is capitalised only when it is probable that future economic benefits or service potential will flow to the Authority and the cost can be measured reliably. All other subsequent expenditure, including repairs and maintenance, is recognised as an expense in the period incurred.

Assets under construction are not depreciated, as they are not yet available for use.

Depreciation is calculated on a straight-line basis over the estimated useful lives of the assets, as follows:

Intangible assets	
Software for personal computers and servers	25%
Other intangible fixed assets	25%
Tangible assets	
Plant and equipment	
Tools for industry and workshops	12,5%
Specific electric equipment	25%
Furniture and vehicles	
Office, laboratory and workshop furniture	10%
Electrical office equipment, printing and mailing equipment	12,5% / 25%
Furniture for restaurant/cafeteria/bar area	10% / 12,5%
Computer hardware	
Computers, servers, accessories, printers, screens	25%
Copying equipment, digitising and scanning equipment	25%
Telecommunications equipment	25%
Audiovisual equipment	25%
Computer books, CDs, DVDs	25% / 33%
Other fixtures and fittings	
Fit-out works buildings	10% - 17%
Other	10%
Fixed assets under construction	
Intangible fixed assets under construction	0%
Tangible fixed assets under construction	0%

Gains or losses on disposal are determined by comparing the proceeds, net of selling costs, with the carrying amount of the asset disposed of and are recognised in the statement of financial performance.

Leases

Leases under which the Authority assumes substantially all the risks and rewards of ownership are classified as finance leases. ESMA had no finance leases in force during the reporting period.

Leases where the lessor retains a significant portion of the risks and rewards incidental to ownership are classified as operating leases. Payments under operating leases are recognised as an expense on a straight-line basis over the lease term.

Receivables and recoverables

Exchange receivables and non-exchange recoverables are recognised at their original amount, adjusted for interest and penalties where applicable, and reduced by impairment losses. An impairment loss is recognised when there is objective evidence that the Authority will not be able to collect all amounts due. The impairment amount represents the difference between the carrying amount and the recoverable amount and is recognised in the statement of financial performance.

Cash and cash equivalents

Cash and cash equivalents comprise cash held in bank accounts open in the name of the Authority, as there are no other cash equivalents or liquid investments with original maturities of three months or less to be reported. Currently, the Authority has contracts with one commercial banking entity.

Payables

Accounts payable include liabilities arising from exchange transactions, such as the purchase of goods and services, as well as from non-exchange transactions, including amounts payable to funding entities as a result of balancing contributions.

Payables relating to goods and services are recognised at invoice value. The corresponding expenses are recognised when the goods or services are delivered and accepted by the Authority.

Provisions

Provisions are recognised when the Authority has a present legal or constructive obligation as a result of a past event, it is probable that an outflow of resources will be required to settle the obligation, and the amount can be reliably estimated. Provisions are measured at the best estimate of the expenditure required to settle the obligation at the reporting date. Where an obligation involves a large population of items, the expected value method is used.

Provisions for onerous contracts are measured at the present value of the lower of the expected cost of terminating the contract and the expected net cost of continuing the contract.

Accrued and deferred revenue and charges

Transactions and events are recognised in the period to which they relate.

Revenue earned but not yet received under existing contractual arrangements gives rise to accrued revenue. Amounts received or authorised in respect of activities not yet performed are recognised as deferred revenue and released in subsequent periods.

In accordance with EU Accounting Rule 10, supplemented by paragraph 19 of IPSAS 19 *Provisions, Contingent Liabilities and Contingent Assets*, accrued charges recognise amounts for goods or services received but not yet invoiced or paid, including staff-related accruals such as accrued annual leave. Accrued charges are determined based on estimates provided by the Authorising Officer following an analysis of budgetary carry-forwards and are reported under current liabilities.

4. Statement of financial performance

Revenue

Revenue comprises gross inflows of economic benefits or service potential received and receivable during the reporting period, resulting in an increase in net assets. Revenue may arise from exchange or non-exchange transactions, depending on whether the Authority provides goods or services of approximately equal value in return.

The Authority's adopted budget is financed through three main revenue streams:

- Contribution from the European Union
- Contribution from National Competent Authorities
- Contribution from supervised entities

Other sources of revenue include contributions from National Competent Authorities in relation to the TRACE and MIDAS Delegated Projects, as well as delegated funds from SG REFORM earmarked for the Supervisory Digital Academy, the Technical Support Instrument supporting supervisory capacity-building activities, including the prevention and mitigation of greenwashing risks, and the CCP Multi-Country Project.

Contributions from the European Union and from EU National Competent Authorities are supplemented by contributions from EFTA National Competent Authorities and by the employer's contribution to the

European pension scheme, financed by the European Union and the EFTA States in accordance with Article 83(a)(2) of the Staff Regulations and the Conditions of Employment of Other Servants.

Pursuant to Article 16(5) of the ESMA Financial Regulation, the Union contribution constitutes a balancing contribution to the Authority's budget and is recognised as revenue only to the extent necessary to cover budgetary expenditure. Any excess received is repayable to the European Commission and is recognised as a liability.

ESMA is also funded by fees received from supervised entities. These consist of:

Source	2025 Adopted Budget
Credit Rating Agencies Fees	11,254,976
Trade Repositories Fees	1,840,617
SFTR Fees	1,072,995
EMIR 2.2. Fees	6,677,992
STS Fees	440,579
Benchmark Fees	1,198,727
DRSP Fees	3,275,520
DORA Fees	581,731
	26,343,137

Expenditure

Expenses represent decreases in economic benefits or service potential during the reporting period in the form of outflows or consumption of assets, or the incurrence of liabilities, that result in decreases in net assets/equity.

Expenses arising from the purchase of goods and services are recognised when the goods or services are delivered and accepted by the Authority and are measured at the original invoice cost.

At year-end, eligible expenses that have been incurred and are due to beneficiaries but have not yet been reported are estimated and recognised as accrued expenses.

5. Contingent assets and liabilities

In accordance with EU Accounting Rule 10, contingent assets and contingent liabilities are possible assets or obligations that are not recognised in the financial statements because their existence will be confirmed only by the occurrence or non-occurrence of one or more uncertain future events not wholly within the control of the Authority.

6. Other

Employee benefits

Staff of the Authority are entitled to pension rights in accordance with the pension scheme laid down in the Staff Regulations and the Conditions of Employment of Other Servants of the European Union (SR).

The pension benefits are managed and paid by the European Commission. In accordance with Article 83(a) of the Staff Regulations, the part of the employer's pension contribution corresponding to the Union subsidy share of the Authority's budget is financed by the general budget of the European Union and not by the Authority.

The remaining part of the employer's pension contribution, corresponding to the proportion of contributions from National Competent Authorities and fees within the Authority's budget, is financed by those revenue streams pursuant to Article 83(a)(2) of the Staff Regulations.

As a result, no pension liability is recognised in the Authority's statement of financial position.

7. Consolidation

The accounts of the European Securities and Markets Authority are fully consolidated in the annual accounts of the European Union.

8. Restatement of comparative figures

During an in-depth review of the fixed asset register, it was identified that certain parts of three internally developed IT systems (CSDRS, STSRE and DRSPS) had remained recorded under *assets under construction* instead of being transferred to *computer software* once they became operational.

As a result, depreciation on these components did not start from the date they were ready for use, leading to an under-recognition of depreciation expense in previous financial years.

System (component under construction)	Amount (component under construction)	Accumulated depreciation to 01/01/2024	Depreciation for 2024
CSDRS	496,353	241,037	124,088
STSRE	308,660	150,102	77,165
DRSPS	51,011	24,422	12,753
	856,024	**415,561**	**214,006**

In accordance with the EU Accounting Rules (based on IPSAS principles), prior-period misstatements must be corrected retrospectively. Consequently, the opening balance at 1 January 2024 has been adjusted to recognise the accumulated amortisation of EUR 415 561. Tables, notes and disclosures have been updated accordingly.

This restatement ensures that the 2025 result is not materially distorted by charges relating to previous years and that the financial statements present a consistent and comparable view across reporting periods.

The misstatement and the related restatement have no impact on the Authority's cash position, budget implementation or operational activities. The adjustment relates exclusively to the timing of depreciation recognition in the financial statements.

The detail of the restatements is presented below:

Statement of financial position

	2024	2024 (rest.)	Variance
ASSETS			
Non-current Assets			
Intangible fixed assets			
Computer software	4,143,078	3,513,511	(629,567)
Total non-current assets	**7,442,136**	**6,812,569**	**(629,567)**
TOTAL ASSETS	**17,041,819**	**16,412,252**	**(629,567)**
TOTAL NET ASSETS	**7,591,056**	**6,961,489**	**(629,567)**

Statement of financial performance

	2024	2024 (rest.)	Variance
Operating Expenses			
Depreciation and amortisation	2,116,280	2,330,286	214,006
Total operating expenses	**79,395,475**	**79,609,481**	**214,006**
OPERATING RESULT	**(3,776,656)**	**(3,990,662)**	**(214,006)**
ECONOMIC RESULT FOR THE YEAR	**(3,765,469)**	**(3,979,475)**	**(214,006)**

Cashflow statement

	2024	2024 (rest.)	Variance
CASHFLOW FROM ORDINARY ACTIVITIES			
Surplus/(Deficit) from ordinary activities	**(3,765,469)**	**(3,979,475)**	**(214,006)**
Depreciation and amortisation	2,116,280	2,330,286	214,006
Net cashflow from operating activities	**1,840,864**	**1,840,864**	**-**

Statement of changes in net assets

Total Net Assets	2024	2024 (rest.)	Variance
Balance as at 31 December 2023	**11,356,525**	**11,356,525**	**-**
Restatement	-	(415,561)	(415,561)
Balance at 1 January 2024	**11,356,525**	**10,940,964**	**(415,561)**
Economic result for the year	(3,765,469)	(3,979,475)	(214,006)
Balance as at 31 December 2024	**7,591,056**	**6,961,489**	**(629,567)**

Intangible assets (for comparison)

	Computer software	Intangible assets under construction	Total
Gross carrying amounts on 31.12.2024	21,312,485	1,970,042	23,282,528
Gross carrying amounts on 31.12.2024 (rest.)	22,168,509	1,114,018	23,282,528
Variance	**856,024**	**(856,024)**	**-**

Accumulated amortisation and impairment on 31.12.2024	(19,139,449)	-	(19,139,449)
Accumulated amortisation and impairment on 31.12.2024 (rest.)	(19,769,017)	-	(19,769,017)
Variance	**(629,567)**	**-**	**(629,567)**

II. Statement of financial position

1. Non-current assets

Non-current assets are fixed assets that are used and controlled by the Authority and comprise tangible assets, intangible assets and long-term receivables.

a. Intangible fixed assets

Intangible fixed assets consist of internally generated software and computer software licences. Internally generated software relates to development costs incurred in the implementation of projects linked to the Authority's mandate.

	Computer software	Intangible assets under construction	Total
Gross carrying amounts on 01.01.2025	**22,168,509**	**1,114,018**	**23,282,528**
Additions	-	1,364,446	**1,364,446**
Disposals	(2,121,569)	(414,616)	**(2,536,185)**
Transfers between headings	-	-	**-**
Other changes	-	-	**-**
Gross carrying amounts on 31.12.2025	**20,046,940**	**2,063,849**	**22,110,789**
Accumulated amortisation and impairment on 01.01.2025	**(19,769,017)**	**-**	**(19,769,017)**
Amortisation	(1,604,447)	-	**(1,604,447)**
Disposals	2,096,173	-	**2,096,173**
Transfers between headings	-	-	**-**
Other changes	516,523	-	**516,523**
Accumulated amortisation and impairment on 31.12.2025	**(18,760,767)**	**-**	**(18,760,767)**

Additions to computer software in 2025 relate to the development of several strategic IT projects. These include the Crypto-Assets Registers project (MiCA) amounting to EUR 229 958, the European Single Access Point (ESAP) project amounting to EUR 415 651, the MiFID III Review implementation (MIREV) amounting to EUR 718 712. The disposals are mainly attributed to the impairment of the DIFEA, RAFSP, REGSTN, and SECEX1 systems as well as to obsolete software licenses. The ESMA Data Hub replacement (HUBRE) did not meet the capitalisation threshold and was therefore removed from *assets under construction*. *Other changes* relate to the reversal of manual corrections previously recorded in respect of fully depreciated assets that had already been disposed of.

Additions of internally generated software in 2025, and their added value in the reporting period, correspond to:

Acronym	Project name	Status	2025 Added Value
CRYPT	Crypto Assets Registers	Under construction	229,958
ESAP	European Single Access Point	Under construction	415 651
MIREV	MiFID III Review	Under construction	718,712
			1,364,446

b. Tangible fixed assets

Tangible fixed assets include mainly furniture, fixtures and IT equipment.

	Plant and equipment	Furniture	Computer hardware	Fixtures, fittings and other	Assets under construction	Total
Gross carrying amounts on 01.01.2025	**1,019**	**795,232**	**1,108,931**	**5,526,367**	**-**	**7,431,549**
Additions	-	-	-	-	-	**-**
Disposals	-	-	(187,272)	(25,103)	-	**(212,375)**
Other changes	-	-	-	-	-	**-**
Gross carrying amounts on 31.12.2025	**1,019**	**795,232**	**921,659**	**5,501,264**	**-**	**7,219,174**
Accumulated depreciation and impairment on 01.01.2025	**(1,019)**	**(585,307)**	**(1,093,218)**	**(2,741,847)**	**-**	**(4,421,391)**
Depreciation	-	(48,072)	(13,254)	(772,885)	-	**(834,211)**
Disposals	-	-	187,272	25,103	-	**212,375**
Other changes	-	-	-	(516,523)	-	**(516,523)**
Accumulated depreciation and impairment on 31.12.2025	**(1,019)**	**(633,379)**	**(919,200)**	**(4,006,152)**	**-**	**(5,559,750)**

Depreciation of *Fixtures, fittings and other* was impacted by the accelerated fit-out obsolescence resulting from the renegotiation of the lease agreement (see section II.3 *Deferred revenue*). *Other changes* relate to the reversal of manual corrections previously recorded in respect of fully depreciated assets that had already been disposed of.

c. Long-term receivables

	2025	2024
Long term receivables	-	288,900
Total	**-**	**288,900**

Long-term receivables comprise financial assets due to the Authority with a contractual maturity exceeding twelve months from the reporting date.

In 2024, long-term receivables included the portion of an outstanding fine imposed by the Authority that was due to be settled in 2026. This amount was therefore reclassified as current receivables in 2025. Further information is provided in section *Current receivables and recoverables* (note II.2.a).

2. Current assets

a. Current receivables and recoverables

	2025	2024
VAT recoverable	505,319	574,941
Receivables from consolidated entities	30,910	910
Other current receivables	606,400	1,155,598
Total	**1,142,629**	**1,731,450**

The recoverable VAT relates to payments to suppliers made during the year 2025 and still to be refunded by the French authorities.

On 20 March 2024, the Board of Supervisors approved decision ESMA43-1868696574-770 to implement supervisory measures and impose fines on a Credit Rating Agency (CRA). In accordance with the provisions of ESMA's Financial Regulation[2], the Authority agreed to a payment plan of 24 monthly instalments, extending from April 2024 to March 2026.

The total amount due amounted to EUR 2 311 197, with each monthly instalment set at EUR 96 300. By the end of 2025, the entity had reimbursed EUR 2 022 297. The instalments due for settlement in 2026, totalling EUR 288 900, have been classified as *Other current receivables*.

In accordance with Commission Delegated Regulation (EU) No 946/2012[3], all fines imposed under this regulation are payable to the European Commission. Therefore, the amounts classified as current receivables on the ESMA balance sheet have an exact correspondence to current payables to consolidated entities.

[2] ESMA63-313-528.
[3] OJ L 282, 16.10.2012, p. 23.

Other current receivables include an amount of EUR 200 000 relating to receivables that had previously been impaired. Following a reassessment performed in the course of 2026, and before the date of signature of these financial statements, the impairment was reversed and the receivables were reinstated.

b. Sundry receivables and recoverables

	2025	2024
Amounts to be regularised from staff	51,795	63,920
Liaison bank account with the EC	9,192,197	2,158,856
Total	**9,243,992**	**2,222,776**

The increase of the cash balance of the liaison bank account is mainly attributable to a lower payment implementation rate in 2025 compared with 2024. The Authority paid the invoices from the European Commission relating to the National Competent Authorities' employer pension contribution for the second half of 2025 and to the payment of staff social contributions for December 2025 in January 2026, leading to a strong cash balance at year-end. In previous years, these invoices had been settled before year-end.

c. Deferred charges and accrued income

	2025	2024
Deferred charges	5,964,497	4,775,635
Total	**5,964,497**	**4,775,635**

Deferred charges mainly relate to rental and IT expenses. In 2025, the Authority made a one-off pre-financing payment covering three-year Azure reservations for the ESAP and BIGDA projects under the Cloud II DPS1 framework contract. This pre-financing payment enabled the Authority to benefit from advantageous discounted rates, thereby optimising the use of budgetary resources. The portion of this payment relating to future periods, amounting to EUR 1 609 900, is recognised as a deferred charge as at 31 December 2025.

d. Cash and cash equivalents

	2025	2024
Crédit Agricole - current account	1,182	1,000
Crédit Agricole - deposit account	2,031,808	868,823
Total	**2,032,990**	**869,823**

Since November 2022, the Authority has used the central treasury services provided by the European Commission. Consequently, cash available for the performance of its operational activities is presented as a sundry receivable in the statement of financial position.

The remaining balance held in the Crédit Agricole bank account relates to an outstanding fine pending transfer to the European Commission. Further information is provided in Note II.2.a, *Current receivables and recoverables*.

3. Deferred revenue

Description	2024	Additions	Reversed	2025	*Thereof non-current* 2025	*Thereof non-current* 2024
iBox – Landlord incentives	2,871,853	-	(1,275,784)	1,596,069	*917,843*	*2,111,718*
IT Delegated Projects	260,649	1,183,764	(68,101)	1,376,312	*124,447*	*192,548*
Joint ESA projects	26,014	-	(26,014)	-	-	-
Fees to be regularised	-	52,501	-	52,501	-	-
Total	**3,158,516**	**1,236,265**	**(1,369,899)**	**3,024,881**	**1,042,290**	**2,304,266**

Under the lease agreement for the premises located in iBox, the landlord granted several incentives, namely a contribution towards fit-out costs (EUR 5 377 730), a rent-free period (EUR 1 467 650) and an invoicing discount (EUR 3 101 660). The first two items, totalling EUR 6 845 381, were recognised as deferred revenue upon taking possession of the premises and have been released on a straight-line basis over the original lease term of nine years.

In December 2025, following approval by the Budgetary Authority, ESMA renegotiated its lease agreement with the current landlord. The amendment provides for an extension of the lease until 2035, a reduction of office space, a breakout clause in 2032, the cancellation of the existing incentives and the introduction of new ones. The amendment will enter into force on 1 July 2026.

Consequently, the schedule for the release of the existing rent-free period incentives was revised so that the remaining deferred balance is fully amortised by the date the renegotiated lease becomes effective. The portion of the fit-out incentive relating to floors that will be returned to the landlord has also been accelerated accordingly. The remaining fit-out incentive continues to be released under the existing schedule until 2028 over the useful life of the underlying asset. As a result, a total of EUR 1 275 784 was released in 2025. Of this amount, EUR 760 135 was recognised against rental expenses, in accordance with the principle of comparability, and EUR 515 649 was recognised under *Other miscellaneous revenue*.

In 2025, ESMA collected EUR 1 378 251 from entities participating in the Markets in Crypto-Assets Common Monitoring Tool (MIDAS). The platform is provided under a Software-as-a-Service (SaaS) arrangement, whereby ESMA obtains a right to access software functionality over the contract term while it remains owned and hosted by the provider. ESMA has no right to take possession of the software or to operate it outside the contractual arrangement; its access is therefore contingent on the contract and does not confer control over the underlying platform. Accordingly, the arrangement is accounted for as a service contract. Furthermore, the Authority acts as principal in this arrangement, as it contracts in its own name for the provision of the software and is responsible for the service delivery, while participating entities have no contractual relation vis-à-vis the provider. The related financial contributions therefore represent revenue recognised on a gross basis. In accordance with the Delegation Agreements (DAs) and Service Level Agreements (SLAs) concluded with the participating entities, any surplus arising where actual costs are lower than the estimated contributions must be returned to the participating NCAs through a reduction of subsequent financial contributions. Accordingly, the portion of the contributions relating to costs of the configuration and maintenance of the platform that had not yet been incurred by year-end, amounting to EUR 1 183 764, was recognised as deferred revenue and will be released in the same period and in the same amounts as the related services are delivered. Deferred revenue relating to IT delegated tasks also includes EUR 192 548 in respect of TRACE Phase 4.

Fees to be regularised include EUR 35 000 relating to two debit notes issued in 2025 to DRSP APAs that transitioned from national to European supervision in mid-2025. These amounts were collected in 2026 and will be redistributed to APAs that were already subject to ESMA supervision during 2025. In addition, a debit note issued to a DRSP ARM for EUR 17 500 was subsequently waived (see Note III.2.c, *Other expenses*). This amount will likewise be reimbursed to the participating entities in 2026.

4. Non-current liabilities

Long-term payables comprise financial liabilities with a contractual maturity exceeding twelve months that the Authority is obliged to settle.

	2025	2024
Long-term payables	-	288,900
Total	**-**	**288,900**

The only long-term payable outstanding at the end of 2024 related to an amount due to the European Commission arising from a fine imposed by the Authority. Further information is provided in Note II.2.a, *Current receivables and recoverables*. As the corresponding payment becomes due in 2026, the liability has been reclassified as a current liability as at 31 December 2025.

5. Current liabilities

a. Current payables

	2025	2024
Payables to suppliers	110,797	215,742
Accrued charges – untaken annual leave	1,030,859	987,880
Accrued charges – core business	5,214,827	1,984,928
Total	**6,356,483**	**3,188,549**

Core business accrued charges represent amounts payable for goods delivered and services rendered in 2025 for which invoices had not yet been received as at 31 December 2025. The Authority received the invoice from the European Commission relating to the National Competent Authorities' employer pension contribution for the second half of 2025 in January 2026. In previous years, this invoice had been received and settled before year-end.

b. Payables towards consolidated entities

	2025	2024
European Commission balancing subsidy	-	400,048
Other payables towards consolidated entities	3,607,948	2,414,751
Total	**3,607,948**	**2,814,799**

The budgetary result for the reporting period, as determined on a modified cash basis, resulted in a deficit of EUR 21 213. Of this amount, EUR 953 is attributable to SG REFORM and EUR -22 167 to DG FISMA. The budgetary deficit is primarily attributable to three debit notes issued in 2025 which remained outstanding as at 31 December 2025, amounting to EUR 148 117. All amounts were subsequently collected in January 2026. As a result, no impairment of the related receivables was considered necessary. These amounts will be taken into account in the 2026 budgetary result in accordance with the modified cash basis applied for budget implementation reporting. The detailed calculation of the budgetary result is presented in the section *Budget implementation reports*.

In 2025, ESMA was financed by a Union contribution amounting to EUR 21 392 466 and by contributions from Member States and EFTA countries amounting to EUR 34 560 954. In accordance with Articles 16(5) and 17(1) of the ESMA Financial Regulation, the Union contribution constitutes a balancing contribution and is accounted for as pre-financing. Where the budgetary result is positive, the surplus is repayable to the European Commission up to the amount of the Union contribution paid during the year.

As the 2025 budgetary result reflects a deficit, no liability arises in respect of the Union balancing subsidy for that year.

Other payables to EU entities include an outstanding pre-financing amounting to EUR 176 147 received from SG REFORM, an amount of EUR 1 119 365 payable to the European Commission in respect of social contributions withheld from staff and EUR 2 319 771 corresponding to the liability towards the European Commission arising from a fine imposed on a supervised entity (refer to Note II.2.a, *Current receivables and recoverables*).

III. Statement of financial performance

In 2025, the Authority concluded the financial year with an economic surplus of EUR 3 442 752.

The increase compared with the previous year is primarily attributable to the return of payment execution rates to levels observed prior to 2024. In 2025, the overall payment execution rate reached 88.8%, representing a decrease of 5.3% compared with 2024. As a result, outstanding budgetary commitments (*Reste à Liquider*, RAL) increased from EUR 4 101 476 in 2024 to EUR 8 729 228 in 2025, corresponding to an increase of 112.8%. Total net assets as at 31 December 2025 amounted to EUR 10 404 241.

In addition, non-recurring items in 2025 had an impact on the result:

1. The revision of the release schedule for existing lease incentives, resulting in additional revenue recognition of EUR 515 649.
2. The one-off pre-financing payment covering three-year Azure reservations for the ESAP and BIGDA projects under the Cloud II DPS1 framework contract, which led to the recognition of deferred charges amounting to EUR 1 609 900.
3. The transfer of unused MIDAS contributions to deferred revenue, amounting to EUR 1 183 764.

1. Operating revenue

The Authority's 2025 revenue comes from the following sources:

	2025	2024
Subsidy from the Member States	33,099,187	30,041,495
Subsidy from EFTA countries	1,024,743	930,077
EU Balancing subsidy	21,829,490	19,842,611
Fees from supervised entities	26,610,637	23,678,866
Of which fees from CRAs	*11,254,976*	*10,394,288*
Of which fees from TRs	*1,840,617*	*1,697,850*
Of which fees from SFTRs	*1,072,995*	*990,157*
Of which fees from TC CCPs	*6,927,992*	*6,302,717*
Of which fees from SRs	*440,579*	*406,708*
Of which fees from BMRKs	*1,198,727*	*1,034,247*
Of which fees from DRSPs	*3,293,020*	*2,852,899*
Of which fees from DORA	*581,731*	-
NCA contribution to IT delegated projects	610,891	329,862
Foreign currency conversion gains	1,742	1,122
Other miscellaneous revenue	1,809,280	794,786
	84,985,969	**75,618,819**

The budgeted contributions from National Competent Authorities for 2025 amounted to EUR 34 560 954, comprising EUR 33 523 088 from Member State NCAs and EUR 1 037 867 from Observer NCAs.

The contribution received in 2025 from the Directorate-General for Financial Stability, Financial Services and Capital Markets Union (DG FISMA) amounted to EUR 21 829 490. This amount includes the reimbursement of the share of the 2023 budgetary surplus attributable to Member States and Observer NCAs, amounting to EUR 437 024. This reimbursement was deducted from the funds called from the NCAs for the financial year.

As ESMA recorded a budgetary deficit in 2025, the full amount of the Union contribution received during the year is recognised as operating revenue.

ESMA established receivables from supervised entities amounting to EUR 26 410 637 during the financial year. During 2025, receivables totalling EUR 67 500 were waived by the Authorising Officer, comprising EUR 50 000 in relation to TC CCP supervision and EUR 17 500 in relation to DRSP supervision. Consequently, the total amount budgeted for the year amounted to EUR 26 343 137. The amounts waived are recognised as a loss under *Other expenses* (see Note III.2.c). Additionally, *Fees from supervised entities* include an amount of EUR 200 000 relating to receivables that had previously been impaired. Following a reassessment performed in the course of 2026, and before the date of signature of these financial statements, the impairment was reversed and the receivables were reinstated.

In 2025, ESMA collected EUR 1 726 554 in earmarked contributions relating to the development and maintenance of IT systems (TRACE and MIDAS). Of these, an amount of EUR 1 183 764 has been recognised as deferred revenue and will be released in line with the recognition of the related costs (see section *Deferred revenue*). In addition, EUR 68 101 was recognised as revenue corresponding to the portion of deferred revenue relating to TRACE Phase 4 allocated to 2025.

Other miscellaneous revenue includes EUR 1 293 631 relating to the SG REFORM's earmarked contribution delegated to ESMA, as well as EUR 515 649 resulting from the revision of the release schedule for lease incentives.

2. Operating expenses

a. Staff expenses

	2025	2024
Salaries and related allowances	45,156,919	43,498,669
Social contributions	7,657,242	6,445,760
SNE costs	1,391,150	1,818,023
Staff perquisites	1,358,072	1,157,100
	55,563,383	**52,919,553**

The variation in salaries, social contributions and related allowances is mainly attributable to a combination of factors: (i) an increase of salary indexation (+1.2% from 1 April 2025, and +3% from 1 July 2025); (ii) a decrease of the correction coefficient for France (from 114.2 to 113.6 from 1 July 2025); (iii) an increase in the pension contribution rate (from 12.1% to 13.1% from 1 July 2025).

b. Building and related expenses

	2025	2024
Rent	6,402,901	5,581,065
Rent related expenses	600,202	762,844
	7,003,103	**6,343,909**

In 2024, on an exceptional basis, the application of the 2025Q1 deduction to the invoice was anticipated to the fourth quarter of 2024. This timing difference resulted in higher rent expenses being recognised in 2025.

c. Other expenses

	2025	2024
Office supplies	19,314	56,991
Communications and Legal	304,709	421,866
Recruitment	70,704	42,739
Training	335,019	330,221
Travel	327,321	346,379
ICT costs	13,250,991	14,888,460
Other expenses	461,173	438,018
Operational activities	1,355,686	1,490,181
	16,124,917	**18,014,855**

The decrease in communication and legal expenses is mainly attributable to one-off payments recorded in 2024, as well as to a 6% reduction in the budget allocated to legal matters (after taking account of budgetary transfers). A similar trend is observed in travel costs, for which the allocated budget was reduced by 8% between 2024 and 2025.

The reduction in ICT costs is primarily attributable to the one-off pre-financing payment covering three-year Azure reservations for the ESAP and BIGDA projects under the Cloud II DPS1 framework contract, which resulted in the recognition of deferred charges amounting to EUR 1 609 900. In addition, the level of available payment appropriations carried forward decreased by 36%. Conversely, accrued charges increased by EUR 361 259. The portion of ICT costs capitalised during the year amounted to EUR 605 734, compared with EUR 668 482 in 2024.

Costs incurred for other projects which do not meet the requirements for capitalisation amount to EUR 742 222.

Other expenses include the loss recognised by two waivers authorised during the reporting period, comprising EUR 50 000 in relation to a TC CCP and EUR 17 500 in relation to the supervision of a DRSP ARM.

Operational activities include various types of expenses financed under Title III, notably access to commercial data, translations and costs for experts and associated expenditure. The variation in *Operational activities* reflects a decrease in the expenditure for translation services. Costs for translations with appropriations adopted in the year amounted to EUR 181 612 in 2025, compared with EUR 377 367 in 2024, after taking into account the impact of accrued charges.

Expenses with consolidated entities are presented according to the nature of the services rendered in order to enhance transparency and comparability.

d. Fixed asset related expenses

	2025	2024
Depreciation of tangible fixed assets	1,255,525	849,878
Depreciation of intangible fixed assets	1,183,133	1,480,408
Amounts written-off	440,012	-
	2,878,670	**2,330,286**

3. Non-operating result

	2025	2024
Non-operating revenue		
Bank interest received	92	1
Other financial income	28,787	12,284
	28,879	**12,285**
Non-operating expenses		
Bank charges	698	687
Other financial expenses	-	411
	698	**1,099**
Total non-operating activities (net)	**28,180**	**11,186**

IV. Other significant disclosures

1. Contingent liabilities

Dilapidation costs

The lease agreement between ESMA and the landlord of the iBox premises requires the Authority to reinstate the premises to their original condition upon termination of the lease.

However, in accordance with the relevant contractual provisions, any reinstatement costs must be formally requested by the landlord following an assessment of the condition of the premises at the date of departure. As the amount of such costs depends on a future assessment and cannot be reliably estimated at the reporting date, no provision has been recognised in the financial statements.

Closed litigation

By its judgement of 29 October 2025, the General Court of the European Union dismissed the applicant's action for annulment and claim for damages in Case T-750/22, *UniSystems Luxembourg and Unisystems systimata pliroforikis v ESMA*, concerning the outcome of procurement procedure PROC/2021/12, launched together with the EBA, EIOPA and ERA (EU Agency for Railways), for which ESMA acted as the responsible and lead contracting authority.

The period for lodging an appeal against that judgement expired in January 2026 and, as at the date of signature of these accounts, ESMA had not received notification of any appeal. Consequently, the Authority considers that no obligation remained outstanding as at 31 December 2025.

2. Budgetary commitments not yet expensed (Accounting RAL)

The Accounting RAL includes the part of the outstanding budgetary commitments which have not yet been recognised as expenses by 31 December 2025:

	2025	2024
Budgetary commitments carried forward to N+1	8,729,228	4,101,476
(Less) Expenses already recognised in N	(5,291,819)	(2,531,294)
	3,437,409	**1,570,182**

3. Events after the reporting date

In 2026, developments occurred that led to the reassessment of the impairment of receivables recognised in previous years. As a result of this reassessment, part of the impairment was reversed and the underlying receivables were reinstated.

Up to the date of authorisation of these financial statements, no other events have come to the attention of the Accounting Officer that would require adjustment to, or separate disclosure in, these financial statements.

The annual accounts and the accompanying notes have been prepared on the basis of the best information available at the date of authorisation. The amounts recognised and the disclosures provided reflect the conditions and information available at that date.

4. Operating lease commitments

The table below presents the future minimum lease payments payable by ESMA in respect of the rental of its office premises.

Under the current lease agreement, the annual gross rental amount amounts to EUR 4 774 580, from which an annual lease incentive of EUR 344 629 is deducted and building charges of EUR 940 447 per year. In December 2025, following approval by the Budgetary Authority, ESMA signed an amendment to the lease agreement with the current landlord. The amended agreement will enter into force on 1 July 2026 and has a duration of 9 years. It provides for annual rent payments of EUR 4 221 668 and annual building charges of EUR 1 184 766. The amended lease includes a break clause exercisable at the end of the sixth year of the lease term (2032). In the event that the break clause is exercised, a penalty equivalent to ten months of payments would be due which would be off-set against remaining uncashed incentives.

iBox premises (Paris)	<1 year	2-5 years	>5 years	Total
Rent and charges	5,556,542	21,625,737	7,769,211	**34,951,490**
Other	-	-	4,085,458	**4,085,458**
Bank guarantee (commission)	2,420	9,680	3,630	**15,730**
Total	**5,558,962**	**21,635,417**	**11,858,299**	**39,052,678**

5. Related party disclosures

Highest grades description	Grade
Chair CCP Supervisory Committee	AD 16
Chairperson	AD 15
Independent Members of the CCP Supervisory Committee	AD 15
Executive Director	AD 14

The remuneration equivalent to the grades of the key management personnel in the table can be found in the Official Journal of the European Union, C/2025/6564 of 11 December 2025.

6. Posts in the establishment plan not funded by underlying revenue

Following the entry into force and/or application of several Union legislative acts, the Authority has been entrusted with new tasks, in particular under the Digital Operational Resilience Act (DORA), the Retail Investment Strategy (RIS), the ESG rating regulation (ESGRR), MIFIR in relation to consolidated tape providers (CTP) and additional tasks related to EMIR. The LFS (Legislative Financial Statements) accompanying these initiatives foresee additional resources, including fee-funded posts, the mobilisation of which is dependent on the conditions set out in the respective legal frameworks.

As of 31 December 2025, 19 establishment plan posts related to these mandates remained vacant. This primarily reflected the timing of the underlying mandates. Notably for CTPs and Critical Third-Party Providers under DORA, the fee collection could only be initiated late in the year; the entry into force of the ESGRR was postponed to 2026 while the RIS was still not adopted. ESMA also faced limited capacity to collect fees under EMIR 2.2 due to the divergence between supervisory context and the initial expectations by the legislation. Furthermore, 11 unfilled establishment plan posts relate to structural vacancy factors. Overall, recruitment has been aligned with the phased and conditional nature of the mandates and corresponding funding.

V. Financial risk management

Financial instruments comprise cash and cash equivalents, current receivables and recoverables, current payables, and amounts due to and from consolidated entities. These instruments give rise to liquidity risk, credit risk, interest rate risk and foreign currency risk.

Information on the nature of these risks and on how they are managed by the Authority is presented below. Deferred charges, accrued income, deferred revenue and accrued charges are excluded from this analysis.

The carrying amounts of the Authority's financial instruments are presented below:

	2025	2024
Financial assets		
Long term receivables	-	288,900
Current receivables	1,142,629	1,731,450
Sundry receivables	9,243,992	2,222,776
Cash and cash equivalents	2,032,990	869,823
	12,419,610	**5,112,948**
Financial liabilities		
Long term payables	-	288,900
Current payables	110,797	215,742
Payables towards EU entities	3,607,948	2,814,799
	3,718,745	**3,319,440**
Total net financial instruments	**8,700,866**	**1,793,507**

1. Liquidity risk

Liquidity risk arises from the Authority's ongoing financial obligations, including the settlement of payables as they fall due. The Authority manages liquidity risk by continuously monitoring forecasted and actual cash flows. In addition, the application of EU budgetary principles, in particular the principle of equilibrium, ensures that overall cash resources available during the financial year are sufficient to meet payment obligations.

Information on the contractual maturities of financial assets and financial liabilities constitutes a key element of liquidity risk management.

The table below presents the contractual maturity analysis of the Authority's financial instruments:

At 31.12.2025	On demand	<1 year	1-2 years	>2 years	Total
Long-term receivables	-	-	-	-	-
Current receivables	-	1,142,629	-	-	1,142,629
Sundry receivables	9,192,197	51,795	-	-	9,243,992
Cash and cash equivalents	2,032,990	-	-	-	2,032,990
Total financial assets (A)	**11,225,187**	**1,194,424**	**-**	**-**	**12,419,610**
Current payables	-	110,797	-	-	110,797
Sundry payables	-	-	-	-	-
Payables to EU entities	-	3,607,948	-	-	3,607,948
Total financial liabilities (B)	**-**	**3,718,745**	**-**	**-**	**3,718,745**
Cumulative liquidity gap (A-B)	**11,225,187**	**8,700,866**	**8,700,866**	**8,700,866**	**8,700,866**

2. Credit risk

Credit risk is the risk of financial loss arising from a counterparty's failure to meet its contractual obligations. Such default events may include delayed payments, restructuring of obligations or insolvency.

Since November 2022, ESMA has used the central treasury services provided by the European Commission for its main operations. The Authority recovers contributions from national supervisory authorities and the European Commission several times per year in order to ensure sound cash management and to maintain an appropriate level of liquidity. Requests for funds submitted to the European Commission are supported by cash flow forecasts. As a result of the centralisation of treasury activities, ESMA's exposure to counterparty credit risk is significantly reduced, as the majority of its cash resources are held with the European Commission.

The maximum exposure to credit risk is:

At 31.12.2025	2025	2024
Long term receivables	-	288,900
Current receivables	1,142,629	1,731,450
Other receivables	9,243,992	2,222,776
Cash in banks	2,032,990	869,823
	12,419,610	**5,112,948**

3. Market risk

Interest rate risk

Interest rate risk is the risk that the value of financial assets or liabilities, or future cash flows, will fluctuate due to changes in market interest rates.

At the Authority, exposure to interest rate risk arises primarily from cash balances. The Authority does not hold interest-bearing securities and does not borrow funds. Consequently, it is not exposed to interest rate risk arising from debt instruments.

Cash balances held in bank accounts are subject to variable market interest rates. The Authority accepts this limited exposure and does not consider it to be material. Interest earned on bank balances is calculated on the basis of variable market reference rates, to which a contractual margin (positive or negative) is applied. Overnight balances held with commercial banks accrue interest on a daily basis.

The Authority monitors market developments to ensure that the remuneration conditions applicable to its bank accounts remain aligned with prevailing market rates.

Currency risk

Currency risk is the risk that the value of financial assets or liabilities will fluctuate as a result of changes in foreign exchange rates.

The majority of the Authority's financial assets and liabilities are denominated in euro. As a result, exposure to foreign currency risk is limited. Any amounts received in currencies other than euro are promptly converted into euro and transferred to euro-denominated accounts.

At the end of 2025, the Authority had no material receivable or payable balances denominated in foreign currencies.

At 31.12.2025	EUR	Other EUR equivalent	Total (EUR)
Other receivables	1,163,514	-	1,163,514
Receivables from other EU entities	9,223,107	-	9,223,107
Cash and cash equivalents	2,032,990	-	2,032,990
Total monetary assets (C)	**12,419,610**	**-**	**12,419,610**
Payables to third parties	110,797	-	110,797
Payables to other EU entities	3,607,948	-	3,607,948
Total monetary liabilities (D)	**3,718,745**	**-**	**3,718,745**
Net Position (C)-(D)	**8,700,866**	**-**	**8,700,866**

Budget implementation reports

I. Budget principles, structure and implementation

1. Budgetary principles

The establishment and implementation of the Authority’s budget comply with the principles of unity and budget accuracy, annuality, equilibrium, unit of account, universality, specification, sound financial management and transparency, as laid down in the Authority’s Financial Regulation and in the Financial Regulation applicable to the general budget of the Union.

Principle of unity and budget accuracy

The budget constitutes the instrument by which, for each financial year, all revenue and expenditure considered necessary for the Authority’s activities are forecast and authorised. No revenue may be collected and no expenditure incurred unless it is entered in a budget line. No appropriations may be entered in the budget unless they correspond to an activity considered necessary, and no commitments or payments may be made in excess of the appropriations authorised in the budget.

Principle of annuality

Budget appropriations are authorised for a single financial year running from 1 January to 31 December. Commitments are recorded on the basis of legal commitments entered into by 31 December. Payments are recorded in the accounts of the financial year in which they are made by the Accounting Officer.

Principle of equilibrium

The budget must be in balance in terms of revenue and payment appropriations. Commitment appropriations may not exceed the total of voted appropriations plus assigned revenue and any other revenue. The Authority is not authorised to borrow.

Principle of unit of account

The budget is drawn up, implemented and reported in euro.

Principle of universality

All revenue and expenditure are entered in the budget in full and without any netting or adjustment between them.

Principle of specification

Appropriations are earmarked for specific purposes by title and chapter and are further subdivided into articles and items. The Executive Director may authorise transfers between articles within a chapter in accordance with the Authority's Financial Regulation.

Principle of sound financial management

Appropriations are used in accordance with the principles of economy, efficiency and effectiveness.

The principle of economy requires that resources are made available in due time, in appropriate quantity and quality and at the best price. The principle of efficiency concerns the optimal relationship between resources employed and results achieved. The principle of effectiveness concerns the achievement of the objectives set and the attainment of the intended results.

Principle of transparency

The budget is drawn up and implemented, and the accounts are presented in accordance with the principle of transparency. The budget as finally adopted is published in the Official Journal of the European Union, and any amending budgets are published in an appropriate manner within two months of their adoption.

2. Types of appropriations

The Authority uses non-differentiated appropriations for both its administrative expenditure (Titles I and II) and its operational expenditure (Titles III and IV).

3. Description of the budget accounts

In accordance with the Authority's Financial Regulation, the budget accounts provide a detailed record of budget implementation and reflect all budgetary revenue and expenditure operations, including voted appropriations, commitments, payments and established entitlements.

The budgetary nomenclature, also referred to as budget lines, is adopted annually by the Board of Supervisors, taking into account the general budgetary nomenclature and the Authority's rules on the structure and presentation of the statement of expenditure.

Title I covers staff expenditure, including salaries and allowances, social security contributions, pensions financed through the EU budget, recruitment costs, training, missions, interim staff and other staff-related entitlements.

Title II covers expenditure relating to buildings, equipment, information technology and other administrative operating costs.

Title III covers operational expenditure relating to the activities carried out in the framework of the Authority's mandate, including information technology, meetings, training, coordination activities, supervisory work and other regulatory and policy tasks.

Title IV budget lines relate to external assigned revenue – activities for which earmarked funds are made available. Such is the case for the budget management of the TRACE and MIDAS projects.

II. Budget result for the financial year

	2025	2024
Revenue		
National Competent Authorities' contribution	33,099,187	30,041,495
Observers' contribution	1,024,743	930,077
Balancing EU subsidy	21,392,466	19,938,075
Recovery of the NCA surplus N-2	437,024	304,584
Earmarked funds from SG REFORM	1,414,899	796,855
Fees from Supervised Entities	26,247,521	23,678,866
NCA contributions for delegated tasks	1,726,554	408,066
Other income	15,625	208,453
Revenue from joint ESAs operations	297,987	-
Bank Interest	-	1
Total Revenue	**85,656,007**	**76,306,472**
Expenditure		
Title I: Staff		
Payments	53,180,095	53,318,039
Appropriations carried over	3,498,599	189,406
Title II: Administrative expenses		
Payments	8,830,459	8,129,555
Appropriations carried over	584,626	423,942
Title III: Operating expenditure		
Payments	13,759,820	10,272,079
Appropriations carried over	4,179,594	3,545,172
Title IV: Expenditure on Delegated Tasks		
Payments	811,660	358,545
Appropriations carried over	1,829,349	717,104
Total Expenditure	**86,674,202**	**76,953,841**
RESULT FOR THE FINANCIAL YEAR	**(1,018,196)**	**(647,369)**
Cancellation of unused appropriations carried over from previous years	73,987	278,841
Adjustment for carry-over of appropriations arising from assigned revenue	922,578	768,331
Exchange differences for the year	418	244
BALANCE OF THE RESULT ACCOUNT	**(21,213)**	**400,048**

III. Reconciliation between the budget result and the economic result

	2025	2024 (restated)
ECONOMIC OUTTURN	**3,442,752**	**(3,979,475)**
Adjustment for accrual items		
Adjustment for accrual cut-off N-1	1,344,586	1,467,490
Adjustment for accrual cut-off N	(43,466)	(2,129,770)
Unpaid invoices at year-end but booked in charges	(1,026,609)	1,365,549
Depreciation and amortisation	2,878,670	2,330,286
Provisions	-	-
Recovery orders booked in revenue not yet cashed	(148,117)	-
Pre-financing given in previous years and cleared in N	-	-
Pre-financing received in previous years and cleared in N	(54,878)	(26,909)
Payments made from carry-over of N-1 appropriations	3,877,658	5,618,206
Other	(7,906)	(290)
Adjustment for budgetary items		
Asset acquisitions (less unpaid amounts)	(1,364,446)	(973,034)
Pre-financing paid in N and open at 31.12.N	-	-
Pre-financing received in N and open at 31.12.N	176,147	454,926
Recovery orders issued before N and cashed in N	-	101,521
Cashed recovery orders issued against balance sheet items	-	-
Payment appropriations carried over to N+1	(10,092,168)	(4,875,624)
Cancellation of unused n-1 appropriations	73,987	278,841
Adjustment for carry-over of assigned revenue from N-1	922,578	768,331
BUDGET RESULT	**(21,213)**	**400,048**

IV. Budget Accounts

1. Revenue

Line	Item	Income appropriations			Entitlements established			Revenue			Outstanding
		Initial budget	Amending budget	Final budget	Current year	Carried over	Total	Current year	Carried over	Total	
1000	Contribution from Member States NCAs	34,243,776	(720,688)	33,523,088	33,523,087	-	33,523,087	33,523,087	-	33,523,087	-
1001	Contribution from Observer NCAs	1,060,179	(22,312)	1,037,867	1,037,867	-	1,037,867	1,037,867	-	1,037,867	-
Total Title I		**35,303,955**	**(743,000)**	**34,560,955**	**34,560,954**	**-**	**34,560,954**	**34,560,954**	**-**	**34,560,954**	**-**
2000	Subsidy from the EU	21,876,466	(484,000)	21,392,466	21,392,466	-	21,392,466	21,392,466	-	21,392,466	-
2100	SG REFORM assigned revenue	-	-	-	1,414,899	-	1,414,899	1,414,899	-	1,414,899	-
Total Title II		**21,876,466**	**(484,000)**	**21,392,466**	**22,807,365**	**-**	**22,807,365**	**22,807,365**	**-**	**22,807,365**	**-**
3000	Fees from CRAs	11,252,976	2,000	11,254,976	11,254,976	-	11,254,976	11,254,976	-	11,254,976	-
3001	Fees from TRs	1,840,617	-	1,840,617	1,840,617	-	1,840,617	1,840,617	-	1,840,617	-
3002	Fees from SFTRs	1,072,995	-	1,072,995	1,072,995	-	1,072,995	1,072,995	-	1,072,995	-
3003	Fees from TC CCPs	6,577,992	100,000	6,677,992	6,677,992	300,000	6,977,992	6,677,992	-	6,677,992	300,000
3004	Fees from SRs	440,579	-	440,579	440,579	-	440,579	440,579	-	440,579	-
3005	Fees from BMRKs	1,118,727	80,000	1,198,727	1,198,727	-	1,198,727	1,198,727	-	1,198,727	-
3006	Fees from DRSPs	3,264,088	11,432	3,275,520	3,328,021	-	3,328,021	3,210,521	-	3,210,521	117,500
3007	Fees from DORA	554,884	26,847	581,731	581,731	-	581,731	551,114	-	551,114	30,617
Total Title III		**26,122,858**	**220,279**	**26,343,137**	**26,395,638**	**300,000**	**26,695,638**	**26,247,521**	**-**	**26,247,521**	**448,117**
7000	Contribution to TRACE	-	-	-	348,303	-	348,303	348,303	-	348,303	-
7100	Contribution to MIDAS	-	-	-	1,378,251	-	1,378,251	1,378,251	-	1,378,251	-
Total Title VII		**-**	**-**	**-**	**1,726,554**	**-**	**1,726,554**	**1,726,554**	**-**	**1,726,554**	**-**
9000	Miscellaneous Revenue	-	-	-	15,625	-	15,625	15,625	-	15,625	-

9100	Revenue from Joint ESA Operations	-	-	-	297,987	-	297,987	297,987	-	297,987	-
Total Title IX		**-**	**-**	**-**	**313,612**	**-**	**313,612**	**313,612**	**-**	**313,612**	**-**
GRAND TOTAL		**83,303,279**	**(1,006,721)**	**82,296,558**	**85,804,124**	**300,000**	**86,104,124**	**85,656,007**	**-**	**85,656,007**	**448,117**

2. Commitment appropriations (breakdown and changes)

Line	Item	Budget appropriations				Additional appropriations			Total appropr. available
		Initial adopted budget	Amending budgets	Transfers	Final adopted budget	Carry-overs	Assigned revenue	Total	
1100	Staff salaries - allowances - insurance and grants	50,502,652	(310,000)	(2,272,614)	47,920,038	-	890,052	890,052	48,810,090
1120	Temporary workers	30,000	-	(30,000)	-	-	-	-	-
1133	Contribution to the Community pension scheme	4,597,468	(17,000)	1,486,358	6,066,826	-	-	-	6,066,826
1200	Expenditure staff management and recruitment	415,000	-	172,845	587,845	-	-	-	587,845
1400	Medical service	81,000	-	18,202	99,202	-	-	-	99,202
1410	Schools and kindergartens	370,000	-	25,000	395,000	-	-	-	395,000
1420	Canteen and associated services	400,000	-	(24,842)	375,158	-	-	-	375,158
1600	Training	352,000	-	(8,363)	343,637	-	936	936	344,573
	Total Title I	**56,748,120**	**(327,000)**	**(633,414)**	**55,787,706**	**-**	**890,988**	**890,988**	**56,678,694**
2000	Building rental - charges and taxes	7,000,000	-	214,838	7,214,838	-	282,409	282,409	7,497,247
2020	Maintenance - works and refurbishment	143,000	-	(86,143)	56,857	-	-	-	56,857
2090	Other expenditure on building	451,000	-	(127,142)	323,858	-	-	-	323,858
2100	Internal ICT and telecommunications	350,000	-	103,377	453,377	-	-	-	453,377
2300	Facility management services	220,000	-	(25,903)	194,097	-	-	-	194,097
2304	Services on administrative matters	574,000	-	67,545	641,545	-	71,745	71,745	713,291

2305	Subscriptions	170,000	-	(6,523)	163,477	-	-	-	163,477
2308	Library expenditure	7,700	-	4,232	11,932	-	-	-	11,932
2700	Representation expenses - receptions and events	6,900	-	(5,950)	950	-	-	-	950
	Total Title II	**8,922,600**	**-**	**138,331**	**9,060,931**	**-**	**354,154**	**354,154**	**9,415,085**
3100	Training costs	10,000	-	(10,000)	-	-	27,000	27,000	27,000
3200	IT project costs	14,500,000	(179,721)	938,185	15,258,464	-	357,581	357,581	15,616,045
3400	Legal advice	148,000	-	(95,825)	52,175	-	-	-	52,175
3500	Access to data for Economic Research	735,000	-	(14,637)	720,363	-	-	-	720,363
3600	Mission expenses	451,000	-	(161,591)	289,409	-	195,155	195,155	484,564
3700	Translation and interpretation	427,672	-	(120,000)	307,672	-	37,535	37,535	345,207
3701	Communications services	240,000	-	(59,193)	180,807	-	-	-	180,807
3800	General meeting expenses	250,000	-	(57,770)	192,230	-	25,109	25,109	217,339
3810	Stakeholder groups - Consultations	110,000	-	(35,143)	74,857	-	-	-	74,857
3820	Governance	20,000	-	(2,500)	17,500	-	-	-	17,500
3830	Board of Appeal costs	50,000	-	(46,151)	3,849	-	-	-	3,849
3900	Services on operational matters	540,000	(500,000)	159,708	199,708	-	-	-	199,708
	Total Title III	**17,481,672**	**(679,721)**	**495,083**	**17,297,034**	**-**	**642,380**	**642,380**	**17,939,414**
4000	Single Interface to Trade Repositories	50,888	-	-	50,888	-	899,328	899,328	950,216
4200	Markets in Crypto-Assets	100,000	-	-	100,000	-	1,378,251	1,378,251	1,478,251
4301	EU SDFA v02	-	-	-	-	-	76,300	76,300	76,300
	Total Title IV	**150,888**	**-**	**-**	**150,888**	**-**	**2,353,879**	**2,353,879**	**2,504,767**
	GRAND TOTAL	**83,303,280**	**(1,006,721)**	**-**	**82,296,559**	**-**	**4,241,402**	**4,241,402**	**86,537,961**

3. Payment appropriations (breakdown and changes)

Line	Item	Budget appropriations				Additional appropriations			Total appropr. available
		Initial adopted budget	Amending budgets	Transfers	Final adopted budget	Carry-overs	Assigned revenue	Total	
1100	Staff salaries - allowances - insurance and grants	50,502,652	(310,000)	(2,272,614)	47,920,038	774	890,052	890,826	48,810,864
1120	Temporary workers	30,000	-	(30,000)	-	-	-	-	-
1133	Contribution to the Community pension scheme	4,597,468	(17,000)	1,486,358	6,066,826	-	-	-	6,066,826
1200	Expenditure staff management and recruitment	415,000	-	172,845	587,845	19,371	-	19,371	607,216
1400	Medical service	81,000	-	18,202	99,202	5,912	-	5,912	105,114
1410	Schools and kindergartens	370,000	-	25,000	395,000	-	-	-	395,000
1420	Canteen and associated services	400,000	-	(24,842)	375,158	12,671	-	12,671	387,829
1600	Training	352,000	-	(8,363)	343,637	150,677	936	151,613	495,250
	Total Title I	**56,748,120**	**(327,000)**	**(633,414)**	**55,787,706**	**189,406**	**890,988**	**1,080,394**	**56,868,100**
2000	Building rental - charges and taxes	7,000,000	-	214,838	7,214,838	4,392	282,409	286,801	7,501,639
2020	Maintenance - works and refurbishment	143,000	-	(86,143)	56,857	15,252	-	15,252	72,109
2090	Other expenditure on building	451,000	-	(127,142)	323,858	96,045	-	96,045	419,903
2100	Internal ICT and telecommunications	350,000	-	103,377	453,377	173,780	-	173,780	627,157
2300	Facility management services	220,000	-	(25,903)	194,097	28,614	-	28,614	222,711
2304	Services on administrative matters	574,000	-	67,545	641,545	76,141	71,745	147,886	789,431
2305	Subscriptions	170,000	-	(6,523)	163,477	27,851	-	27,851	191,328
2308	Library expenditure	7,700	-	4,232	11,932	1,286	-	1,286	13,218
2700	Representation expenses - receptions and events	6,900	-	(5,950)	950	292	-	292	1,242
	Total Title II	**8,922,600**	**-**	**138,331**	**9,060,931**	**423,652**	**354,154**	**777,807**	**9,838,738**
3100	Training costs	10,000	-	(10,000)	-	11,000	27,000	38,000	38,000

3200	IT project costs	14,500,000	(179,721)	938,185	15,258,464	2,513,488	357,581	2,871,069	18,129,533
3400	Legal advice	148,000	-	(95,825)	52,175	26,850	-	26,850	79,025
3500	Access to data for Economic Research	735,000	-	(14,637)	720,363	375,140	-	375,140	1,095,503
3600	Mission expenses	451,000	-	(161,591)	289,409	16,812	195,155	211,968	501,377
3700	Translation and interpretation	427,672	-	(120,000)	307,672	308,676	37,535	346,210	653,882
3701	Communications services	240,000	-	(59,193)	180,807	37,935	-	37,935	218,742
3800	General meeting expenses	250,000	-	(57,770)	192,230	26,482	25,109	51,591	243,820
3810	Stakeholder groups - Consultations	110,000	-	(35,143)	74,857	14,400	-	14,400	89,257
3820	Governance	20,000	-	(2,500)	17,500	7,273	-	7,273	24,773
3830	Board of Appeal costs	50,000	-	(46,151)	3,849	-	-	-	3,849
3900	Services on operational matters	540,000	(500,000)	159,708	199,708	-	-	-	199,708
	Total Title III	**17,481,672**	**(679,721)**	**495,083**	**17,297,034**	**3,338,055**	**642,380**	**3,980,435**	**21,277,469**
4000	Single Interface to Trade Repositories	50,888	-	-	50,888	532	1,035,570	1,036,102	1,086,990
4200	Markets in Crypto-Assets	100,000	-	-	100,000	-	1,378,251	1,378,251	1,478,251
4301	EU SDFA v02	-	-	-	-	-	76,300	76,300	76,300
	Total Title IV	**150,888**	**-**	**-**	**150,888**	**532**	**2,490,121**	**2,490,653**	**2,641,541**
	GRAND TOTAL	**83,303,280**	**(1,006,721)**	**-**	**82,296,559**	**3,951,645**	**4,377,643**	**8,329,288**	**90,625,847**

4. Implementation of commitment appropriations

Line	Item	Total appropr. available	Commitments made				Appropriations carried over to 2026		
			from final adopted budget	from carry-overs	from assigned revenue	Total	Assigned revenue	Carry over on decision	Total
1100	Staff salaries - allowances - insurance and grants	48,810,090	47,920,038	-	890,052	48,810,090	-	-	-
1133	Contribution to the Community pension scheme	6,066,826	6,066,826	-	-	6,066,826	-	-	-
1200	Expenditure staff management and recruitment	587,845	587,845	-	-	587,845	-	-	-
1400	Medical service	99,202	99,202	-	-	99,202	-	-	-
1410	Schools and kindergartens	395,000	395,000	-	-	395,000	-	-	-
1420	Canteen and associated services	375,158	375,158	-	-	375,158	-	-	-
1600	Training	344,573	343,637	-	-	343,637	936	-	936
	Total Title I	**56,678,694**	**55,787,706**	**-**	**890,052**	**56,677,758**	**936**	**-**	**936**
2000	Building rental - charges and taxes	7,497,247	7,214,838	-	282,409	7,497,247	-	-	-
2020	Maintenance - works and refurbishment	56,857	56,857	-	-	56,857	-	-	-
2090	Other expenditure on building	323,858	323,858	-	-	323,858	-	-	-
2100	Internal ICT and telecommunications	453,377	453,377	-	-	453,377	-	-	-
2300	Facility management services	194,097	194,097	-	-	194,097	-	-	-
2304	Services on administrative matters	713,291	641,545	-	757	642,302	70,989	-	70,989
2305	Subscriptions	163,477	163,477	-	-	163,477	-	-	-
2308	Library expenditure	11,932	11,932	-	-	11,932	-	-	-
2700	Representation expenses - receptions and events	950	950	-	-	950	-	-	-
	Total Title II	**9,415,085**	**9,060,931**	**-**	**283,166**	**9,344,097**	**70,989**	**-**	**70,989**
3100	Training costs	27,000	-	-	27,000	27,000	-	-	-
3200	IT project costs	15,616,045	15,258,464	-	131,339	15,389,803	226,242	-	226,242
3400	Legal advice	52,175	52,175	-	-	52,175	-	-	-
3500	Access to data for Economic Research	720,363	720,363	-	-	720,363	-	-	-
3600	Mission expenses	484,564	289,409	-	195,155	484,564	-	-	-

3700	Translation and interpretation	345,207	307,672	-	37,535	345,207	-	-	-
3701	Communications services	180,807	180,807	-	-	180,807	-	-	-
3800	General meeting expenses	217,339	192,230	-	25,109	217,339	-	-	-
3810	Stakeholder groups - Consultations	74,857	74,857	-	-	74,857	-	-	-
3820	Governance	17,500	17,500	-	-	17,500	-	-	-
3830	Board of Appeal costs	3,849	3,849	-	-	3,849	-	-	-
3900	Services on operational matters	199,708	199,708	-	-	199,708	-	-	-
	Total Title III	**17,939,414**	**17,297,034**	**-**	**416,138**	**17,713,172**	**226,242**	**-**	**226,242**
4000	Single Interface to Trade Repositories	950,216	50,888	-	406,536	457,424	492,793	-	492,793
4200	Markets in Crypto-Assets	1,478,251	100,000	-	806,270	906,270	571,981	-	571,981
4301	EU SDFA v02	76,300	-	-	76,300	76,300	-	-	-
	Total Title IV	**2,504,767**	**150,888**	**-**	**1,289,106**	**1,439,994**	**1,064,773**	**-**	**1,064,773**
	GRAND TOTAL	**86,537,961**	**82,296,559**	**-**	**2,878,462**	**85,175,021**	**1,362,940**	**-**	**1,362,940**

Line	Item	Appropriations lapsing from final adopted budget	Appropriations lapsing from carry-overs	Appropriations lapsing from assigned revenue	Total
1100	Staff salaries - allowances - insurance and grants	-	-	-	-
1133	Contribution to the Community pension scheme	-	-	-	-
1200	Expenditure staff management and recruitment	-	-	-	-
1400	Medical service	-	-	-	-
1410	Schools and kindergartens	-	-	-	-
1420	Canteen and associated services	-	-	-	-
1600	Training	-	-	-	-
	Total Title I	-	-	-	-
2000	Building rental - charges and taxes	-	-	-	-
2020	Maintenance - works and refurbishment	-	-	-	-
2090	Other expenditure on building	-	-	-	-
2100	Internal ICT and telecommunications	-	-	-	-
2300	Facility management services	-	-	-	-
2304	Services on administrative matters	-	-	-	-
2305	Subscriptions	-	-	-	-
2308	Library expenditure	-	-	-	-
2700	Representation expenses - receptions and events	-	-	-	-
	Total Title II	-	-	-	-
3100	Training costs	-	-	-	-
3200	IT project costs	-	-	-	-
3400	Legal advice	-	-	-	-
3500	Access to data for Economic Research	-	-	-	-
3600	Mission expenses	-	-	-	-
3700	Translation and interpretation	-	-	-	-
3701	Communications services	-	-	-	-
3800	General meeting expenses	-	-	-	-
3810	Stakeholder groups - Consultations	-	-	-	-
3820	Governance	-	-	-	-
3830	Board of Appeal costs	-	-	-	-
3900	Services on operational matters	-	-	-	-
	Total Title III	-	-	-	-
4000	Single Interface to Trade Repositories	-	-	-	-
4200	Markets in Crypto-Assets	-	-	-	-
4301	EU SDFA v02	-	-	-	-
	Total Title IV	-	-	-	-
	GRAND TOTAL	-	-	-	-

5. Implementation of payment appropriations

Line	Item	Total appropr. available	Payments made: from final adopted budget	Payments made: from carry-overs	Payments made: from assigned revenue	Payments made: Total	Appropriations carried over to 2026: Automatic carry-overs	Appropriations carried over to 2026: Carry over on decision	Appropriations carried over to 2026: Assigned revenue	Appropriations carried over to 2026: Total
1100	Staff salaries - allowances - insurance and grants	48,810,864	47,919,900	620	890,052	48,810,571	138	-	-	138
1133	Contribution to the Community pension scheme	6,066,826	2,859,421	-	-	2,859,421	3,207,405	-	-	3,207,405
1200	Expenditure staff management and recruitment	607,216	453,938	19,282	-	473,220	133,907	-	-	133,907
1400	Medical service	105,114	77,482	5,873	-	83,356	21,720	-	-	21,720
1410	Schools and kindergartens	395,000	390,470	-	-	390,470	4,530	-	-	4,530
1420	Canteen and associated services	387,829	361,668	12,671	-	374,339	13,490	-	-	13,490
1600	Training	495,250	227,164	144,275	-	371,440	116,473	-	936	117,409
	Total Title I	**56,868,100**	**52,290,044**	**182,722**	**890,052**	**53,362,817**	**3,497,662**	**-**	**936**	**3,498,599**
2000	Building rental - charges and taxes	7,501,639	7,214,838	4,392	282,409	7,501,639	-	-	-	-
2020	Maintenance - works and refurbishment	72,109	41,503	14,128	-	55,631	15,354	-	-	15,354
2090	Other expenditure on building	419,903	245,336	91,612	-	336,949	78,522	-	-	78,522
2100	Internal ICT and telecommunications	627,157	258,978	167,172	-	426,150	194,399	-	-	194,399
2300	Facility management services	222,711	175,632	26,745	-	202,377	18,465	-	-	18,465
2304	Services on administrative matters	789,431	505,066	67,808	-	572,874	136,479	-	71,745	208,224
2305	Subscriptions	191,328	101,833	27,851	-	129,684	61,644	-	-	61,644
2308	Library expenditure	13,218	4,126	1,286	-	5,412	7,806	-	-	7,806
2700	Representation expenses - receptions and events	1,242	737	110	-	847	213	-	-	213
	Total Title II	**9,838,738**	**8,548,050**	**401,104**	**282,409**	**9,231,563**	**512,881**	**-**	**71,745**	**584,626**
3100	Training costs	38,000	-	10,854	-	10,854	-	-	27,000	27,000
3200	IT project costs	18,129,533	12,419,347	2,479,906	91,928	14,991,181	2,839,117	-	265,653	3,104,770
3400	Legal advice	79,025	49,180	26,850	-	76,030	2,995	-	-	2,995
3500	Access to data for Economic Research	1,095,503	405,197	372,357	-	777,554	315,166	-	-	315,166

3600	Mission expenses	501,377	230,177	16,403	81,486	328,065	59,232	-	113,670	172,902
3700	Translation and interpretation	653,882	127,949	307,876	33,335	469,159	179,724	-	4,200	183,923
3701	Communications services	218,742	65,004	37,272	-	102,276	115,804	-	-	115,804
3800	General meeting expenses	243,820	155,389	23,412	14,085	192,886	36,841	-	11,024	47,865
3810	Stakeholder groups - Consultations	89,257	66,277	14,400	-	80,677	8,580	-	-	8,580
3820	Governance	24,773	16,619	3,971	-	20,590	881	-	-	881
3830	Board of Appeal costs	3,849	3,849	-	-	3,849	-	-	-	-
3900	Services on operational matters	199,708	-	-	-	-	199,708	-	-	199,708
	Total Title III	**21,277,469**	**13,538,986**	**3,293,301**	**220,833**	**17,053,120**	**3,758,048**	**-**	**421,546**	**4,179,594**
4000	Single Interface to Trade Repositories	1,086,990	46,105	532	463,087	509,723	4,783	-	572,483	577,267
4200	Markets in Crypto-Assets	1,478,251	5,284	-	240,185	245,469	94,716	-	1,138,066	1,232,782
4301	EU SDFA v02	76,300	-	-	57,000	57,000	-	-	19,300	19,300
	Total Title IV	**2,641,541**	**51,389**	**532**	**760,272**	**812,192**	**99,499**	**-**	**1,729,849**	**1,829,349**
	GRAND TOTAL	**90,625,847**	**74,428,468**	**3,877,658**	**2,153,566**	**80,459,692**	**7,868,091**	**-**	**2,224,077**	**10,092,168**

Line	Item	Appropriations lapsing from final adopted budget	Appropriations lapsing from carry-overs	Appropriations lapsing from assigned revenue	Total
1100	Staff salaries - allowances - insurance and grants	-	155	-	155
1133	Contribution to the Community pension scheme	-	-	-	-
1200	Expenditure staff management and recruitment	-	89	-	89
1400	Medical service	-	39	-	39
1410	Schools and kindergartens	-	-	-	
1420	Canteen and associated services	-	-	-	
1600	Training	-	6,401	-	6,401
	Total Title I	**-**	**6,684**	**-**	**6,684**
2000	Building rental - charges and taxes	-	-	-	-
2020	Maintenance - works and refurbishment	-	1,123	-	1,123
2090	Other expenditure on building	-	4,432	-	4,432
2100	Internal ICT and telecommunications	-	6,609	-	6,609
2300	Facility management services	-	1,869	-	1,869
2304	Services on administrative matters	-	8,333	-	8,333
2305	Subscriptions	-	-	-	-
2308	Library expenditure	-	-	-	-
2700	Representation expenses - receptions and events	-	182	-	182
	Total Title II	**-**	**22,549**	**-**	**22,549**
3100	Training costs	-	146	-	146
3200	IT project costs	-	33,582	-	33,582
3400	Legal advice	-	-	-	-
3500	Access to data for Economic Research	-	2,783	-	2,783
3600	Mission expenses	-	409	-	409
3700	Translation and interpretation	-	800	-	800
3701	Communications services	-	663	-	663
3800	General meeting expenses	-	3,070	-	3,070
3810	Stakeholder groups - Consultations	-		-	
3820	Governance	-	3,302	-	3,302
3830	Board of Appeal costs	-	-	-	-
3900	Services on operational matters	-	-	-	-
	Total Title III	**-**	**44,754**	**-**	**44,754**
4000	Single Interface to Trade Repositories	-	-	-	-
4200	Markets in Crypto-Assets	-	-	-	-
4301	EU SDFA v02	-	-	-	-
	Total Title IV	**-**	**-**	**-**	**-**
	GRAND TOTAL	**-**	**73,987**	**-**	**73,987**

6. Commitments outstanding at the end of the year

Line	Item	Commitments outstanding at the end of 2024				Commitments of the current year			Total commitments outstanding
		Commitments carried forward	Decommitments/ Cancellations	Payments	Total	Commitments made	Payments	Commitments outstanding	
1100	Staff salaries - allowances - insurance and grants	774	(155)	620	-	48,810,090	48,809,951	138	138
1133	Contribution to the Community pension scheme	-	-	-	-	6,066,826	2,859,421	3,207,405	3,207,405
1200	Expenditure staff management and recruitment	19,371	(89)	19,282	-	587,845	453,938	133,907	133,907
1400	Medical service	5,912	(39)	5,873	-	99,202	77,482	21,720	21,720
1410	Schools and kindergartens	-	-	-	-	395,000	390,470	4,530	4,530
1420	Canteen and associated services	12,671	-	12,671	-	375,158	361,668	13,490	13,490
1600	Training	150,677	(6,401)	144,275	-	343,637	227,164	116,473	116,473
	Total Title I	**189,406**	**(6,684)**	**182,722**	**-**	**56,677,758**	**53,180,095**	**3,497,662**	**3,497,662**
2000	Building rental - charges and taxes	4,392	-	4,392	-	7,497,247	7,497,247	-	-
2020	Maintenance - works and refurbishment	15,252	(1,123)	14,128	-	56,857	41,503	15,354	15,354
2090	Other expenditure on building	96,045	(4,432)	91,612	-	323,858	245,336	78,522	78,522
2100	Internal ICT and telecommunications	173,780	(6,609)	167,172	-	453,377	258,978	194,399	194,399
2300	Facility management services	28,614	(1,869)	26,745	-	194,097	175,632	18,465	18,465
2304	Services on administrative matters	76,141	(8,333)	67,808	-	642,302	505,066	137,236	137,236
2305	Subscriptions	27,851	-	27,851	-	163,477	101,833	61,644	61,644
2308	Library expenditure	1,286	-	1,286	-	11,932	4,126	7,806	7,806
2700	Representation expenses - receptions and events	292	(182)	110	-	950	737	213	213
	Total Title II	**423,652**	**(22,549)**	**401,104**	**-**	**9,344,097**	**8,830,459**	**513,638**	**513,638**
3100	Training costs	11,000	(146)	10,854	-	27,000	-	27,000	27,000
3200	IT project costs	2,513,488	(33,582)	2,479,906	-	15,389,803	12,511,275	2,878,528	2,878,528
3400	Legal advice	26,850	-	26,850	-	52,175	49,180	2,995	2,995
3500	Access to data for Economic Research	375,140	(2,783)	372,357	-	720,363	405,197	315,166	315,166
3600	Mission expenses	16,812	(409)	16,403	-	484,564	311,662	172,902	172,902
3700	Translation and interpretation	308,676	(800)	307,876	-	345,207	161,284	183,923	183,923

3701	Communications services	37,935	(663)	37,272	-	180,807	65,004	115,804	115,804
3800	General meeting expenses	26,482	(3,070)	23,412	-	217,339	169,474	47,865	47,865
3810	Stakeholder groups - Consultations	14,400	-	14,400	-	74,857	66,277	8,580	8,580
3820	Governance	7,273	(3,302)	3,971	-	17,500	16,619	881	881
3830	Board of Appeal costs	-	-	-	-	3,849	3,849	-	-
3900	Services on operational matters	-	-	-	-	199,708	-	199,708	199,708
	Total Title III	**3,338,055**	**(44,754)**	**3,293,301**	**-**	**17,713,172**	**13,759,820**	**3,953,352**	**3,953,352**
4000	Single Interface to Trade Repositories	150,362	(13,589)	121,812	14,962	457,424	387,911	69,512	84,474
4200	Markets in Crypto-Assets	-	-	-	-	906,270	245,469	660,801	660,801
4301	EU SDFA v02	-	-	-	-	76,300	57,000	19,300	19,300
	Total Title IV	**150,362**	**(13,589)**	**121,812**	**14,962**	**1,439,994**	**690,381**	**749,613**	**764,575**
	GRAND TOTAL	**4,101,476**	**(87,576)**	**3,998,938**	**14,962**	**85,175,021**	**76,460,754**	**8,714,266**	**8,729,228**

Financial systems and management

ESMA uses the ABAC system for both budgetary and financial accounting. The system integrates budget implementation and accrual-based accounting information within a single environment, with SAP serving as the back-end accounting engine. The reporting tool used by ESMA is ABAC Data Warehouse.

The ABAC workflow module supports the authorisation process and ensures compliance with the principle of segregation of duties, including the application of the “four-eyes” principle for each transaction.

For the management of fixed assets and inventory, in accordance with the requirements of the ESMA Financial Regulation, the Authority uses ABAC Assets.

In November 2025, ESMA’s financial systems were validated by the Accounting Officer in accordance with Article 49(e) of the ESMA Financial Regulation.

A full physical inventory of IT equipment and furniture was conducted in the first quarter of 2025. Any material discrepancies identified during this exercise were duly recorded in the accounts prior to the finalisation of the annual financial statements.

Establishment plan

Function group and grade	2025			
	Authorised budget		Filled as of 31/12	
	Permanent	Temporary	Permanent	Temporary
AD 16		1		1
AD 15		3		3
AD 14		1		1
AD 13		3		
AD 12		11		10
AD 11		19		9
AD 10		39		36
AD 9		42		30
AD 8		34		30
AD 7		38		36
AD 6		66		49
AD 5		7		32
AD TOTAL		264		237
AST 11				
AST 10				
AST 9				
AST 8		1		
AST 7		1		1
AST 6		6		4
AST 5		6		3
AST 4				1
AST 3		1		2
AST 2				1
AST 1				
AST TOTAL		15		12
GRAND TOTAL	**279**		**249**	