Observations from testing of RoI reporting to the ESAs. Key common issues identified

16 April 2025

Introduction

- The ESAs have performed testing of the submissions of DORA Registers of information from the EU competent authorities to its infrastructure.
- Most EU competent authorities have submitted data in the TEST environment, using either test data or real data collected from financial entities.
- The end-to-end testing revealed data quality issues that were communicated to the competent authorities, often requiring further interaction with financial entities and resubmission of the data.
- These slides provide an overview of the most common issues identified in the testing phase and the explanations of the most common errors.
- Technical checks and validation rules that are applied by the ESAs are described here: Overview of technical checks, validation rules and business checks to be applied by the EBA for RoI reporting (updated 14 March 2025)

All information provided is for illustration and reference purposes, reflecting the design and set-up of the ESAs reporting infrastructure. It should be noted that the validation checks, and feedback messages implemented by the competent authorities in their reporting solutions used for the collection of the registers of information from the financial entities may differ from those explained on these slides.

Most Common Errors – per error code

	A	B	C	D
1	Rule Code	Count	Category	Description
2	805	32969	Additional Plain-csv	For open tables, the key columns values cannot be empty
3	v8886_m	26716	DPM Business Validation-User defined	with {tB_07.01, default: null, interval: false}: if (not (isnull ({c0030}))) or not ((isnull ({c0060}))) or not ((isnull ({c0070}))) or not ((isnull ({c0050}))) or not ((isnull ({c0090}))) or not ((isnull ({c0100}))) or
4	v8885_m	26296	DPM Business Validation-User defined	with {tB_07.01, default: null, interval: false}: if (not (isnull ({c0030}))) or not ((isnull ({c0060}))) or not ((isnull ({c0050}))) or not ((isnull ({c0080}))) or not ((isnull ({c0090}))) or not ((isnull ({c0100}))) or
5	v8884_m	26281	DPM Business Validation-User defined	with {tB_07.01, default: null, interval: false}: if (not (isnull ({c0030}))) or not ((isnull ({c0060}))) or not ((isnull ({c0070}))) or not ((isnull ({c0080}))) or not ((isnull ({c0090}))) or not ((isnull ({c0100}))) or
6	v8888_m	26278	DPM Business Validation-User defined	with {tB_07.01, default: 0, interval: false}: if (not (isnull ({c0030}))) or not ((isnull ({c0060}))) or not ((isnull ({c0070}))) or not ((isnull ({c0080}))) or not ((isnull ({c0090}))) or not ((isnull ({c0050}))) or
7	v88889_m	26277	DPM Business Validation-User defined	with {tB_07.01, default: null, interval: false}: if (not (isnull ({c0060}))) or not ((isnull ({c0070}))) or not ((isnull ({c0080}))) or not ((isnull ({c0090}))) or not ((isnull ({c0100}))) or
8	807	13753	Additional Plain-csv	The reported data must follow the key-foreign key contraints defined in the DPM
9	v8850_m	6059	DPM Business Validation-User defined	with {tB_05.01, default: null, interval: false}: if (not (isnull ({c0030}))) or not ((isnull ({c0040}))) or not ((isnull ({c0050}))) or not ((isnull ({c0060}))) or not ((isnull ({c0070}))) or not ((isnull ({c0080}))) or
10	VR_71	252	Business Check-LEI code validity	b_05_01-ICT third-party service providers, c0010
11	806	240	Additional Plain-csv	For open tables, you cannot have multiple rows with identical key values
12	VR_16	216	Business Check-Country Code validity	b_01_02-List of entities within the scope of the register of information, c0030
13	v8882_m	125	DPM Business Validation-User defined	with {tB_06.01, default: null, interval: false}: if (not (isnull ({c0030}))) or not ((isnull ({c0050}))) or not ((isnull ({c0060}))) or not ((isnull ({c0070}))) or not ((isnull ({c0080}))) or not ((isnull ({c0020}))) or
14	v8881_m	125	DPM Business Validation-User defined	with {tB_06.01, default: null, interval: false}: if (not (isnull ({c0030}))) or not ((isnull ({c0050}))) or not ((isnull ({c0060}))) or not ((isnull ({c0070}))) or not ((isnull ({c0020}))) or not ((isnull ({c0090}))) or
15	v8883_m	119	DPM Business Validation-User defined	with {tB_06.01, default: null, interval: false}: if (not (isnull ({c0030}))) or not ((isnull ({c0050}))) or not ((isnull ({c0060}))) or not ((isnull ({c0070}))) or not ((isnull ({c0080}))) or not ((isnull ({c0020}))) or
16	808	98	Additional Plain-csv	All filing indicators have to be sent as true - and the templates reported empty if no data is present
17	503	85	DPM Technical Checks	Extensible main property and explicit key dimension must only be reported with one of the restricted value of a hierarchy
18	801	53	Additional Plain-csv	All the header column codes must be defined in the taxonomy json files (in DPM)
19	VR_77	49	Business Check-LEI code validity	b_05_01-ICT third-party service providers, c0030
20	v8851_m	41	DPM Business Validation-User defined	with {tB_05.01, default: null, interval: false}: if (not (isnull ({c0030}))) or not ((isnull ({c0040}))) or not ((isnull ({c0020}))) or not ((isnull ({c0060}))) or not ((isnull ({c0070}))) or not ((isnull ({c0080}))) or
21	v8878_m	39	DPM Business Validation-User defined	with {tB_06.01, default: null, interval: false}: if (not (isnull ({c0020}))) or not ((isnull ({c0050}))) or not ((isnull ({c0060}))) or not ((isnull ({c0070}))) or not ((isnull ({c0080}))) or not ((isnull ({c0090}))) or
22	VR_72	38	Business Check-EUID code validity	b_05_01-ICT third-party service providers, c0010
23	v8852_m	33	DPM Business Validation-User defined	with {tB_05.01, default: null, interval: false}: if (not (isnull ({c0030}))) or not ((isnull ({c0040}))) or not ((isnull ({c0050}))) or not ((isnull ({c0020}))) or not ((isnull ({c0070}))) or not ((isnull ({c0080}))) or
24	v8871_m	32	DPM Business Validation-User defined	with {tB_02.02, default: null, interval: false}: if (not (isnull ({c0070}))) or not ((isnull ({c0040}))) or not ((isnull ({c0090}))) or not ((isnull ({c0100}))) or not ((isnull ({c0110}))) or not ((isnull ({c0120}))) or
25	v8825_m	26	DPM Business Validation-User defined	with {tB_07.01, default:0, interval: false}: if {c0050} = [eba_ZZ:x959] or {c0050} = [eba_ZZ:x960] then (not (isnull ({c0060}))) endif
26	VR_23	23	Business Check-LEI code validity	b_01_02-List of entities within the scope of the register of information, c0060
27	VR_12	20	Business Check-LEI code validity	b_01_02-List of entities within the scope of the register of information, c0010
28	v8826_m	19	DPM Business Validation-User defined	match({tB_01.02, c0060}, "^[A-Z0-9]{18}[0-9]{2}$")
29	720	19	CSV	Valid table names must be used as .csv filenames
30	714	17	CSV	The 'entityID' parameter must exist and its value must match filename
31	v8853_m	17	DPM Business Validation-User defined	with {tB_05.01, default: null, interval: false}: if (not (isnull ({c0030}))) or not ((isnull ({c0040}))) or not ((isnull ({c0050}))) or not ((isnull ({c0060}))) or not ((isnull ({c0020}))) or not ((isnull ({c0080}))) or

Number of files affected per type of error

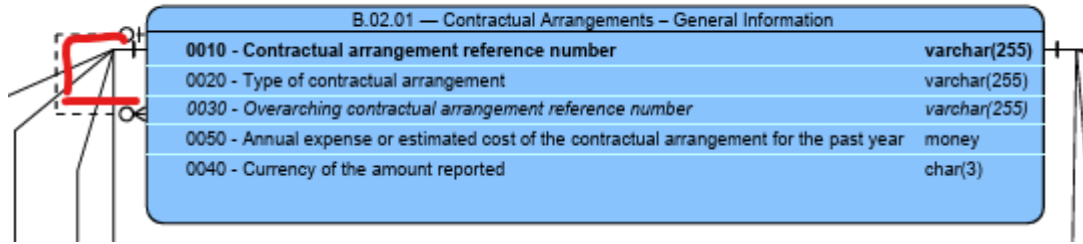| Rule Code	Count	Category	Description
807	294	Additional Plain-csv	The reported data must follow the key-foreign key contraints defined in the DPM
v8886_m	188	DPM Business Validation-User defined	with {tB_07.01, default: null, interval: false}: if (not (isnull ({c0030}))) or not ((isnull ({c0060}))) or not ((isnull ({c0070}))) or not ((isnull ({c0050}))) or not ((isnull ({c009
805	173	Additional Plain-csv	For open tables, the key columns values cannot be empty
v8850_m	166	DPM Business Validation-User defined	with {tB_05.01, default: null, interval: false}: if (not (isnull ({c0030}))) or not ((isnull ({c0040}))) or not ((isnull ({c0050}))) or not ((isnull ({c0060}))) or not ((isnull ({c007
v8885_m	166	DPM Business Validation-User defined	with {tB_07.01, default: null, interval: false}: if (not (isnull ({c0030}))) or not ((isnull ({c0060}))) or not ((isnull ({c0050}))) or not ((isnull ({c0080}))) or not ((isnull ({c009
v8884_m	165	DPM Business Validation-User defined	with {tB_07.01, default: null, interval: false}: if (not (isnull ({c0030}))) or not ((isnull ({c0060}))) or not ((isnull ({c0070}))) or not ((isnull ({c0080}))) or not ((isnull ({c009
v8888_m	164	DPM Business Validation-User defined	with {tB_07.01, default: null, interval: false}: if (not (isnull ({c0030}))) or not ((isnull ({c0060}))) or not ((isnull ({c0070}))) or not ((isnull ({c0080}))) or not ((isnull ({c009
v88889_m	163	DPM Business Validation-User defined	with {tB_07.01, default: null, interval: false}: if (not (isnull ({c0030}))) or not ((isnull ({c0060}))) or not ((isnull ({c0070}))) or not ((isnull ({c0080}))) or not ((isnull ({c009
808	87	Additional Plain-csv	All filing indicators have to be sent as true - and the templates reported empty if no data is present
VR_71	28	Business Check-LEI code validity	b_05_01-ICT third-party service providers, c0010
720	19	CSV	Valid table names must be used as .csv filenames
VR_23	18	Business Check-LEI code validity	b_01_02-List of entities within the scope of the register of information, c0060
806	16	Additional Plain-csv	For open tables, you cannot have multiple rows with identical key values
VR_12	15	Business Check-LEI code validity	b_01_02-List of entities within the scope of the register of information, c0010
714	14	CSV	The 'entityID' parameter must exist and its value must match filename
VR_72	13	Business Check-EUID code validity	b_05_01-ICT third-party service providers, c0010
103	12	Reception	ZIP consistency (checksum, unzips correctly).
801	10	Additional Plain-csv	All the header column codes must be defined in the taxonomy json files (in DPM)
VR_77	10	Business Check-LEI code validity	b_05_01-ICT third-party service providers, c0030
v8826_m	10	DPM Business Validation-User defined	match({tB_01.02, c0060}, "^[A-Z0-9]{18}[0-9]{2}$")
v8862_m	9	DPM Business Validation-User defined	with {tB_01.02, default: null, interval: false}: if (not (isnull ({c0030}))) or not ((isnull ({c0040}))) or not ((isnull ({c0020}))) or not ((isnull ({c0050}))) or not ((isnull ({c007
v8865_m	9	DPM Business Validation-User defined	with {tB_01.02, default: null, interval: false}: if (not (isnull ({c0030}))) or not ((isnull ({c0040}))) or not ((isnull ({c0050}))) or not ((isnull ({c0060}))) or not ((isnull ({c007
v8825_m	8	DPM Business Validation-User defined	with {tB_07.01, default:0, interval: false}: if {c0050} = [eba_ZZ:x959] or {c0050} = [eba_ZZ:x960] then (not (isnull ({c0060}))) endif
VR_78	7	Business Check-EUID code validity	b_05_01-ICT third-party service providers, c0030
VR_2	7	Business Check-LEI code validity	b_01_01-Entity maintaining the register of information, c0010
306	6	DPM Technical Checks	XBRL instance documents must use UTF-8 encoding.
v8864_m	6	DPM Business Validation-User defined	with {tB_01.02, default: null, interval: false}: if (not (isnull ({c0030}))) or not ((isnull ({c0040}))) or not ((isnull ({c0050}))) or not ((isnull ({c0060}))) or not ((isnull ({c007
101	5	Reception	Report filename extension must be zip
v8871_m	5	DPM Business Validation-User defined	with {tB_02.02, default: null, interval: false}: if (not (isnull ({c0070}))) or not ((isnull ({c0040}))) or not ((isnull ({c0090}))) or not ((isnull ({c0100}))) or not ((isnull ({c011
503	5	DPM Technical Checks	Extensible main property and explicit key dimension must only be reported with one of the restricted value of a hierarchy

Top 20 errors codes – presented in next slides

	Description	Leads to Reject
807	Foreign key constraint violated	YES
v8886_m, v8850_m, v8885_m, v8884_m, v8888_m, v88889_m	Mandatory values missing	NO
805	Primary key missing	YES
808	Missing filing indicators or case is wrong	YES
VR_71, VR_23, VR_12, VR_77	Wrong LEI reported	NO
720	Non-DORA files reported, or case is wrong	YES
806	For open tables you cannot report identical key values	NO
714	entityID parameter – does not match filename	YES
VR_72	EUID code was not found in BRIS	NO
103	Report file structure - content	YES
801	All table header codes must be in the taxonomy	YES
v8826_m	LEI mask validity	NO

eba | European Banking Authority

eiopa
European Insurance and Occupational Pensions Authority

ESMA
European Securities and Markets Authority

Top 1 - 807 – Foreign key violation – self reference

This is an example of an FK failing for self-reference being violated. The self reference can be seen in the model shared in the EBA website. Input is on the right. Violation at the bottom. C 0030 value not in any row for C 0010.

B.02.01 — Contractual Arrangements – General Information

0010 - Contractual arrangement reference number	varchar(255)
0020 - Type of contractual arrangement	varchar(255)
0030 - Overarching contractual arrangement reference number	varchar(255)
0050 - Annual expense or estimated cost of the contractual arrangement for the past year	money
0040 - Currency of the amount reported	char(3)

b_02.01.csv
```
1   c0010,c0020,c0030,c0040,c0050
2   RIVER-00008783,eba_CO:x1,,eba_CU:EUR,27000
3   RIVER-00008801,eba_CO:x1,,eba_CU:EUR,27000
4   RIVER-00008802,eba_CO:x1,,eba_CU:EUR,4239
5   RIVER-00008804,eba_CO:x1,,eba_CU:EUR,33930
6   RIVER-00008805,eba_CO:x1,,eba_CU:EUR,4200
7   RIVER-00008807,eba_CO:x1,,eba_CU:EUR,0
8   RIVER-00008808,eba_CO:x1,,eba_CU:EUR,74400
9   RIVER-00008809,eba_CO:x1,,eba_CU:EUR,220000
10  RIVER-00008810,eba_CO:x2,,eba_CU:EUR,44250
11  RIVER-00008812,eba_CO:x2,,eba_CU:EUR,170625
12  RIVER-00008813,eba_CO:x2,,eba_CU:EUR,1500000
13  RIVER-00008814,eba_CO:x2,,eba_CU:EUR,0
14  RIVER-00008815,eba_CO:x2,,eba_CU:EUR,3568215
15  RIVER-00008818,eba_CO:x1,,eba_CU:EUR,5972
16  RIVER-00008819,eba_CO:x1,,eba_CU:EUR,200000
17  RIVER-00008820,eba_CO:x1,,eba_CU:EUR,10000
18  RIVER-00008821,eba_CO:x1,,eba_CU:EUR,3000
19  RIVER-00008822,eba_CO:x1,,eba_CU:EUR,1000000
20  RIVER-00008824,eba_CO:x1,,eba_CU:EUR,15000
21  RIVER-00009701,eba_CO:x1,,eba_CU:EUR,0
22  RIVER-00009702,eba_CO:x1,,eba_CU:EUR,0
23  RIVER-00009704,eba_CO:x1,,eba_CU:EUR,0
24  RIVER-00009705,eba_CO:x1,,eba_CU:EUR,24000
25  RIVER-00009707,eba_CO:x1,,eba_CU:EUR,0
26  RIVER-00009708,eba_CO:x1,,eba_CU:EUR,0
27  RIVER-00009709,eba_CO:x1,,eba_CU:EUR,0
28  RIVER-00009710,eba_CO:x1,,eba_CU:EUR,0
29  RIVER-00009713,eba_CO:x1,,eba_CU:EUR,0
30  RIVER-00009714,eba_CO:x1,,eba_CU:EUR,18000
31  RIVER-00009715,eba_CO:x1,,eba_CU:EUR,3600
32  RIVER-00009716,eba_CO:x1,,eba_CU:EUR,19200
33  RIVER-00009718,eba_CO:x1,,eba_CU:EUR,0
34  RIVER-00009719,eba_CO:x1,,eba_CU:EUR,0
35  RIVER-00009722,eba_CO:x1,,eba_CU:EUR,0
36  RIVER-00009723,eba_CO:x1,,eba_CU:EUR,4035
37  RIVER-00009724,eba_CO:x3,RIVER-00030977,eba_CU:EUR,7800
38  RIVER-00009726,eba_CO:x3,RIVER-00030977,eba_CU:EUR,0
39  RIVER-00009728,eba_CO:x2,,eba_CU:EUR,370424
40  RIVER-00009730,eba_CO:x2,,eba_CU:EUR,4781
41  RIVER-00009731,eba_CO:x2,,eba_CU:EUR,78688
42  RIVER-00009732,eba_CO:x1,,eba_CU:EUR,0
43  RIVER-00009734,eba_CO:x2,,eba_CU:EUR,2986
44  RIVER-00009735,eba_CO:x1,,eba_CU:EUR,37500
45  RIVER-00009736,eba_CO:x1,,eba_CU:EUR,25000
46  RIVER-00009739,eba_CO:x1,,eba_CU:EUR,97500
47  RIVER-00009740,eba_CO:x1,,eba_CU:EUR,25000
48  RIVER-00031026,eba_CO:x1,,eba_CU:EUR,20000
```
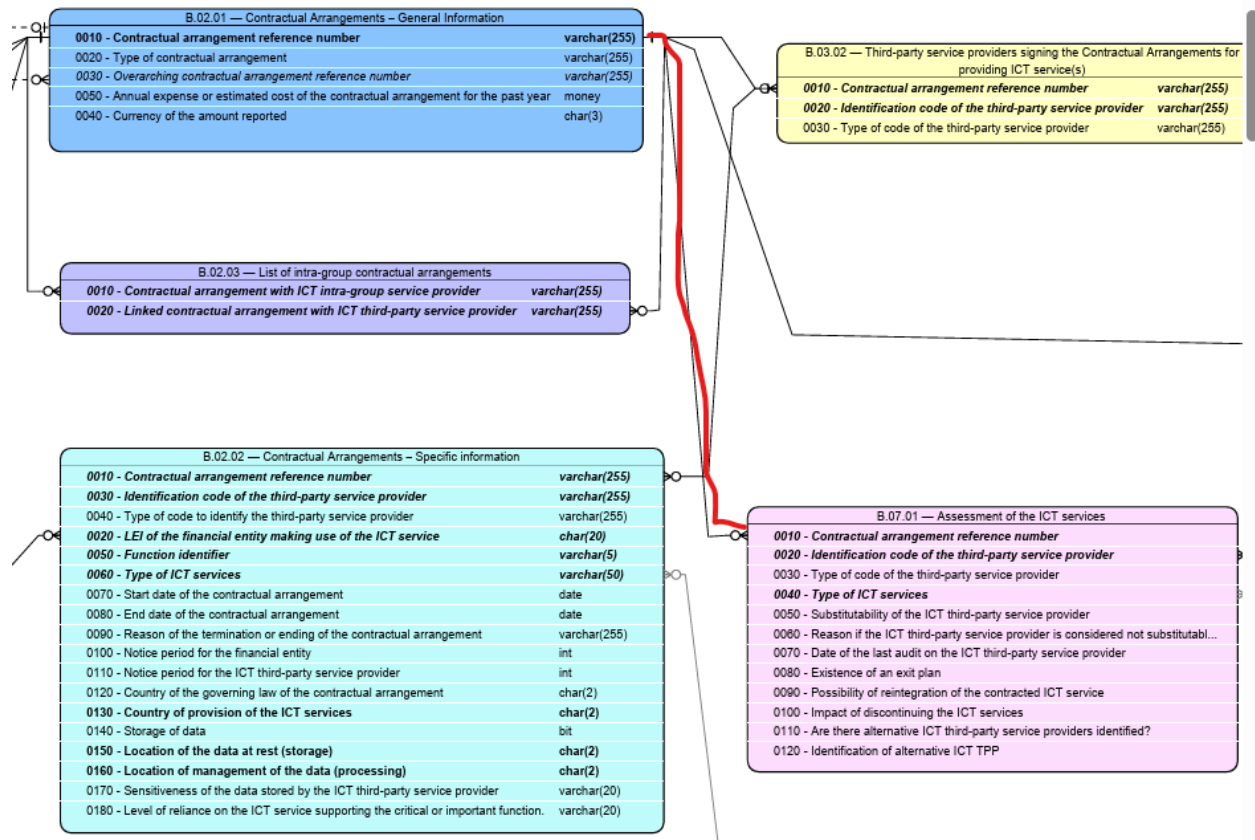
```
"detailedFeedback": [
    "templateCode,rowCode,columnCode,ruleCode,message,offendingValue",
    "b0201,36,c0030,807,The reported data must follow the key-foreign key constraints defined in the DPM,RIVER-00030977",
    "b0201,37,c0030,807,The reported data must follow the key-foreign key constraints defined in the DPM,RIVER-00030977",
]
```

eba European Banking Authority

eiopa European Insurance and Occupational Pensions Authority

ESMA European Securities and Markets Authority

Top 1 - 807 – Foreign key violation – across tables

Leads to reject

Example Relationship
B 07.10 C 0010
Must match something
In
B 02.01 C 0010

Top 1 - 807 – Foreign key violation – across tables

Error reported is

```
"detailedFeedback": [
    "templateCode,rowCode,columnCode,ruleCode,message,offendingValue",
    "b0701,12,c0010,807,The reported data must follow the key-foreign key constraints defined in the DPM,CNTR0010917",
    "b0701,13,c0010,807,The reported data must follow the key-foreign key constraints defined in the DPM,CNTR0010917",
    "b0701,14,c0010,807,The reported data must follow the key-foreign key constraints defined in the DPM,CNTR0010917",
]
```

Value found in B 07.01 is CNTR0010917

Top 1 - 807 – Foreign key violation – across tables

Leads to reject

But CNTR0010917 is not found in b 02.01 hence the error

Top 1 - 807 – Foreign key violation – across tables

If for some reason, one of the templates is not possible to integrate, for example:

- 801 error - All the header column codes must be defined in the taxonomy json files (in DPM)
- 805 error - For open tables, the key columns values cannot be empty

Then many FK can potentially fail, and other tables will be referring to the failed to load table.

This is expected behaviour, a database system would fail for this reason.

Top 2 - v8886_m, etc – Mandatory values missing

Pattern example:

with {tB_07.01, default: null, interval: false}: if (….) then ((not (isnull ({c0080})))) endif

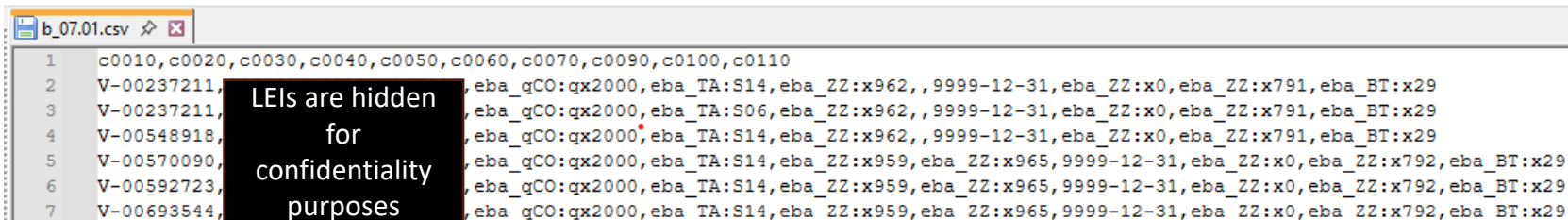Essentially means

For B 07.01 c0080 is mandatory

Also, can be found on the model shared on the EBA website here as in the table shared next

Table	Column	Type	Length	PrimaryKey	ForeignKey	Nullable
	0010 - Contractual arrangement reference number	varchar	255	Yes	Yes	No
	0020 - Identification code of the third-party service provider	varchar	255	Yes	Yes	No
	0030 - Type of code of the third-party service provider	varchar	255	No	No	Yes
	0040 - Type of ICT services	varchar	255	Yes	No	No
	0050 - Substitutability of the ICT third-party service provider	varchar	255	No	No	No
B.07.01 — Assessment of the ICT services	0060 - Reason if the ICT third-party service provider is considered not substitutable or difficult to be substitutable	varchar	255	No	No	Yes
	0070 - Date of the last audit on the ICT third-party service provider	date	0	No	No	No
	0080 - Existence of an exit plan	bit	0	No	No	No
	0090 - Possibility of reintegration of the contracted ICT service	varchar	255	No	No	No
	0100 - Impact of discontinuing the ICT services	varchar	255	No	No	No
	0110 - Are there alternative ICT third-party service providers identified?	bit	0	No	No	No
	0120 - Identification of alternative ICT TPP	varchar	255	No	No	Yes

Top 2 - v8886_m, etc – Mandatory values – column is gone

```
"detailedFeedback": [
    "templateCode,rowCode,columnCode,ruleCode,message,offendingValue",
    "b0701,1,c0080,v8886_m,Value should not be missing,None",
    "b0701,2,c0080,v8886_m,Value should not be missing,None",
    "b0701,3,c0080,v8886_m,Value should not be missing,None",
    "b0701,4,c0080,v8886_m,Value should not be missing,None",
    "b0701,5,c0080,v8886_m,Value should not be missing,None",
    "b0701,6,c0080,v8886_m,Value should not be missing,None"
]
```

C 0080 is missing completely from the input

b_07.01.csv

```
1   c0010,c0020,c0030,c0040,c0050,c0060,c0070,c0090,c0100,c0110
2   V-00237211,          ,eba_qCO:qx2000,eba_TA:S14,eba_ZZ:x962,,9999-12-31,eba_ZZ:x0,eba_ZZ:x791,eba_BT:x29
3   V-00237211,   LEIs are hidden   ,eba_qCO:qx2000,eba_TA:S06,eba_ZZ:x962,,9999-12-31,eba_ZZ:x0,eba_ZZ:x791,eba_BT:x29
4   V-00548918,        for           ,eba_qCO:qx2000,eba_TA:S14,eba_ZZ:x962,,9999-12-31,eba_ZZ:x0,eba_ZZ:x791,eba_BT:x29
5   V-00570090,   confidentiality   ,eba_qCO:qx2000,eba_TA:S14,eba_ZZ:x959,eba_ZZ:x965,9999-12-31,eba_ZZ:x0,eba_ZZ:x792,eba_BT:x29
6   V-00592723,     purposes         ,eba_qCO:qx2000,eba_TA:S14,eba_ZZ:x959,eba_ZZ:x965,9999-12-31,eba_ZZ:x0,eba_ZZ:x792,eba_BT:x29
7   V-00693544,                      ,eba_qCO:qx2000,eba_TA:S14,eba_ZZ:x959,eba_ZZ:x965,9999-12-31,eba_ZZ:x0,eba_ZZ:x792,eba_BT:x29
```

Top 2 - v8886_m, etc – Mandatory values – value is gone

```
"detailedFeedback": [
    "templateCode,rowCode,columnCode,ruleCode,message,offendingValue",
    "b0701,1,c0080,v8886_m,Value should not be missing,None",
    "b0701,3,c0080,v8886_m,Value should not be missing,None",
    "b0701,5,c0080,v8886_m,Value should not be missing,None",
    "b0701,7,c0080,v8886_m,Value should not be missing,None",
    "b0701,12,c0080,v8886_m,Value should not be missing,None",
    "b0701,14,c0080,v8886_m,Value should not be missing,None"
]
```

C 0080 is not filled

Leads to reject

Primary keys can be found documented in the model share in the EBA web site

Table	Column	Type	Length	PrimaryKey	ForeignKey	Nullable
	function					
	0010 - Contractual arrangement reference number	varchar	255	Yes	Yes	No
	0020 - Identification code of the third-party service provider	varchar	255	Yes	Yes	No
	0030 - Type of code of the third-party service provider	varchar	255	No	No	Yes
	0040 - Type of ICT services	varchar	255	Yes	No	No
	0050 - Substitutability of the ICT third-party service provider	varchar	255	No	No	No
B.07.01 — Assessment of the ICT services	0060 - Reason if the ICT third-party service provider is considered not substitutable or difficult to be substitutable	varchar	255	No	No	Yes
	0070 - Date of the last audit on the ICT third-party service provider	date	0	No	No	No
	0080 - Existence of an exit plan	bit	0	No	No	No
	0090 - Possibility of reintegration of the contracted ICT service	varchar	255	No	No	No
	0100 - Impact of discontinuing the ICT services	varchar	255	No	No	No
	0110 - Are there alternative ICT third-party service providers identified?	bit	0	No	No	No
	0120 - Identification of alternative ICT TPP	varchar	255	No	No	Yes

Top 3 - 805 – Primary key missing

```
"detailedFeedback": [
    "templateCode,rowCode,columnCode,ruleCode,message,offendingValue",
    "b0701,41,c0010,805,"For open tables, the key columns values cannot be empty",None",
    "b0701,42,c0010,805,"For open tables, the key columns values cannot be empty",None",
    "b0701,43,c0010,805,"For open tables, the key columns values cannot be empty",None",
    "b0701,44,c0010,805,"For open tables, the key columns values cannot be empty",None",
]
```

C 0010 values are missing

	b_07.01.csv
1	c0010,c0020,c0030,c0040,c0050,c0060,c0070,c0080,c0090,c0100,c0110,c0120
42	,eba_qCO:qx2000,,,,,,,,,
43	,eba_qCO:qx2000,,,,,,,,,
44	,eba_qCO:qx2000,,,,,,,,,
45	,eba_qCO:qx2000,,,,,,,,,
46	eba_qCO:qx2000

LEIs are hidden for confidentiality purposes

Top 4 - 808 – Missing filing indicators or case is wrong

```
"detailedFeedback": [
    "templateCode,rowCode,columnCode,ruleCode,message,offendingValue",
    "FilingIndicators.csv,,,808,All filing indicators have to be sent as true,"
]
```
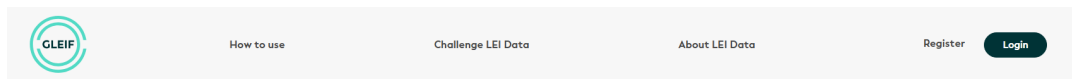
All DORA templates must be reported

- TemplateIDs are expected in **capitals** in the FilingIndicators.csv.
- All reported template IDs must be declared as **true**, with **1,** allowed as **true** value.
- Template can be reported empty, if no content to report.
- Rule 808 replaces 405 in the rest of EUCLID; it is an indication that the reporter has <u>NOT</u> declared to report all templates expected.
- Reported template IDs declared as **false** or with the value **0,** will be rejected with 808 filing indicator error.

```
FilingIndicators.csv
 1   templateID,reported
 2   B_01.01,true
 3   B_01.02,true
 4   B_01.03,false
 5   B_02.01,true
 6   B_02.02,true
 7   B_02.03,false
 8   B_03.01,false
 9   B_03.02,true
10   B_03.03,false
11   B_04.01,false
12   B_05.01,true
13   B_05.02,true
14   B_06.01,true
15   B_07.01,true
16   B_99.01,false
17
```

```
"detailedFeedback": [
    "templateCode,rowCode,columnCode,ruleCode,message,offendingValue",
    "b0501,23,c0010,VR_71,LEI code needs to be a valid one according to the GLEIF database,3912009K5596FEEZIQ",
]
```

There is a set of Business validation rules checking against GLEIF. EBA keeps a cache of the GLEIF database

Top 6 - 720 - Non-DORA templates, or case is wrong

Lower case accepted

Missing files now accepted

Top 6 - 720 - Non-DORA templates, or case is wrong

Leads to reject

Name	Date modified	Type	Size
B_01.01.csv	11/04/2025 10:10	Microsoft Excel C...	1 KB
B_01.02.csv	10/04/2025 11:27	Microsoft Excel C...	1 KB
B_01.03.csv	09/04/2025 15:05	Microsoft Excel C...	1 KB
B_02.01.csv	09/04/2025 15:24	Microsoft Excel C...	2 KB
B_02.02.csv	09/04/2025 15:05	Microsoft Excel C...	92 KB
B_02.03.csv	09/04/2025 15:05	Microsoft Excel C...	1 KB
B_03.01.csv	09/04/2025 15:05	Microsoft Excel C...	1 KB
B_03.02.csv	09/04/2025 15:04	Microsoft Excel C...	1 KB
B_03.03.csv	09/04/2025 15:02	Microsoft Excel C...	1 KB
B_04.01.csv	09/04/2025 15:04	Microsoft Excel C...	2 KB
B_05.01.csv	09/04/2025 15:25	Microsoft Excel C...	3 KB
B_05.02.csv	09/04/2025 15:01	Microsoft Excel C...	3 KB
B_06.01.csv	09/04/2025 15:01	Microsoft Excel C...	17 KB
B_07.01.csv	09/04/2025 15:06	Microsoft Excel C...	4 KB
B_99.01.csv	10/04/2025 10:08	Microsoft Excel C...	2 KB
FilingIndicators.csv	11/04/2025 11:55	Microsoft Excel C...	1 KB
parameters.csv	11/04/2025 11:05	Microsoft Excel C...	1 KB
report.json	09/04/2025 15:53	JSON File	1 KB

b_01.01.csv	11/04/2025 15:46	Microsoft Excel C...	1 KB
b_01.02.csv	11/04/2025 15:46	Microsoft Excel C...	1 KB
b_02.01.csv	11/04/2025 15:46	Microsoft Excel C...	2 KB
b_02.02.csv	11/04/2025 15:46	Microsoft Excel C...	5 KB
b_03.02.csv	11/04/2025 15:46	Microsoft Excel C...	3 KB
b_05.01.csv	11/04/2025 15:46	Microsoft Excel C...	6 KB
b_05.02.csv	11/04/2025 15:46	Microsoft Excel C...	3 KB
b_06.01.csv	11/04/2025 15:46	Microsoft Excel C...	2 KB
b_07.01.csv	11/04/2025 15:46	Microsoft Excel C...	7 KB
FilingIndicators.csv	13/04/2025 13:56	Microsoft Excel C...	1 KB
parameters.csv	11/04/2025 15:46	Microsoft Excel C...	1 KB
report.json	11/04/2025 15:46	JSON File	1 KB
s_99.01.csv	11/04/2025 15:46	Microsoft Excel C...	7 KB

Extra-wrong filename rejected

Upper case rejected

Top 7 - 806 – Identical key values on open tables

Key columns can be identified from the model shared on the web site. If a user reports the same key twice then it will be rejected with 806. This is an example

Table	Column	Type	Length	PrimaryKey	ForeignKey	Nullable
B.05.01 — ICT third-party service provider	**0010 - Identification code of the third-party service provider**	varchar	255	Yes	No	No
	0020 - Type of code of the third-party service provider	varchar	255	No	No	No
	0030 - Additional identification code of the third-party service provider	int	0	No	No	Yes
	0040 - Type of additional identification code of the third-party service provider	varchar	255	No	No	Yes
	0050 - Legal name of the third-party service provider	varchar	255	No	No	No
	0060 - Name of the ICT third-party service provider in Latin alphabet	varchar	255	No	No	Yes
	0070 - Type of person of the third-party service provider	varchar	255	No	No	No
	0080 - Country of the third-party service provider's headquarters	char	2	No	No	No
	0090 - Currency of the amount reported	char	3	No	No	Yes
	0100 - Total annual expense or estimated cost of the third-party service provider	money	0	No	No	Yes
	0110 - Identification code of the third-party service provider's ultimate parent undertaking	varchar	255	No	Yes	No
	0120 - Type of code of the third-party service provider's ultimate parent undertaking	varchar	255	No	No	Yes

```
  b_05.01.csv
1  c0010,c0020,c0030,c0040,c0050,c0060,c0070,c0080,c0090,c0100,c0110,c0120
2  INR2EJN1ERANOW5ZP974,eba_qCO:qx2000,,,Microsoft Corporation,Microsoft Corporation,eba_CT:x212,eba_GA:USA,eba_CU:EUR,1093.38,INR2EJN1ERANOW5ZP974,eba_qCO:qx2000
3  INR2EJN1ERANOW5ZP974,eba_qCO:qx2000,,,Microsoft Corporation,Microsoft Corporation,eba_CT:x212,eba_GA:USA,eba_CU:EUR,6811.98,INR2EJN1ERANOW5ZP974,eba_qCO:qx2000
4  ELGEMI.134501901000,eba_qCO:qx2002,,,VOICELAND AE,VOICELAND AE,eba_CT:x212,eba_GA:GR,eba_CU:EUR,371.07,ELGEMI.134501901000,eba_qCO:qx2002
5  529900BLNVEW0MVKJB37,eba_qCO:qx2000,,,Hubspot Inc.,Hubspot Inc.,eba_CT:x212,eba_GA:USA,eba_CU:EUR,0,529900BLNVEW0MVKJB37,eba_qCO:qx2000
6  6354003LMZZAKOPXLX69,eba_qCO:qx2000,,,Github Inc.,Github Inc.,eba_CT:x212,eba_GA:USA,eba_CU:EUR,0,6354003LMZZAKOPXLX69,eba_qCO:qx2000
7  254900X7UAJNMLPLZ510,eba_qCO:qx2000,,,Asana Inc.,Asana Inc.,eba_CT:x212,eba_GA:USA,eba_CU:EUR,0,254900X7UAJNMLPLZ510,eba_qCO:qx2000
```

Top 8 - 714 - entityID parameter does not match filename

Leads to reject

Example filename
5299001ZDCILHOAR7Q32.CON_DE_DORA010100_DORA_2025-03-31_20250411211200001.zip

```
parameters.csv
1    "name","value"
2    "entityID","lei:5299001ZDCILHOAR7Q32.CON"
3    "refPeriod","2025-03-31"
4    "baseCurrency","iso4217:EUR"
5    "decimalsInteger","0"
6    "decimalsMonetary","-3"
7
```

```
parameters.csv
1    "name","value"
2    "entityID","rs:5299001ZDCILHOAR7Q32.CON"
3    "refPeriod","2025-03-31"
4    "baseCurrency","iso4217:EUR"
5    "decimalsInteger","0"
6    "decimalsMonetary","-3"
7
```

Gets rejected

Gets accepted

Top 9 - VR_72 - EUID code was not found in BRIS

Hard for the CAs and reporters to check the EUID in advance

Common issues that can be avoided
- LEI is flagged as EUID.
- Reported EUID does not follow the EUID pattern.
- Easy validations for the CAs to implement
  - It should have a dot (.)
  - It should start with the 2 letter ISO-code of one of the EEA countries

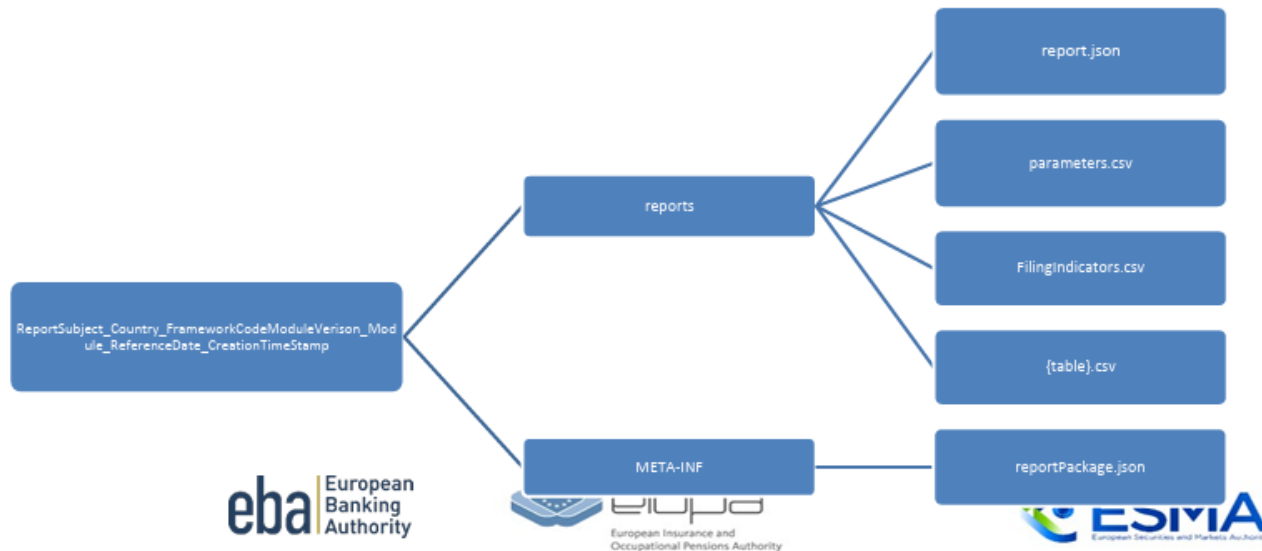| BRIS Status	Count
INVALID_EUID_FORMAT	58170
FOUND	2717
NOT_FOUND	258

Top 10 - 103 - Report file structure - content

Please just follow the structure on the presentation about creating the reporting package

Plain-csv reporting package structure

- **ReportSubject.CON/.IND_Country_FrameworkCodeModuleVersion_Module_ReferenceDate_CreationTimestamp. zip**
  - ➤ DUMMYLEI123456789012.CON_IT_DORA010100_DORA_2024-12-31_20240821141632000.zip
  - ➤ DUMMYLEI123456789012.IND_IT_DORA010100_DORA_2024-12-31_20240821141632000.zip
  - (DUMMYLEI123456789012 should be replaced by the LEI of the reporter institution)

Top 11- 801 - All table header codes must be in the taxonomy

"detailedFeedback": [
    "templateCode,rowCode,columnCode,ruleCode,message,offendingValue",
    "b_01.02.csv,,,801,All header column codes must be defined in the schema,"
]

Leads to reject

Table	Column	Type	Length	PrimaryKey	ForeignKey	Nullable
	0010 - LEI of the entity	char	20	Yes	No	No
	0020 - Name of the entity	varchar	255	No	No	No
	0030 - Country of the entity	char	2	No	No	No
	0040 - Type of entity	varchar	255	No	No	No
	0050 - Hierarchy of the entity within the group (where applicable)	varchar	255	No	No	No
B.01.02 — List of financial entities within the scope of the register of information	*0060 - LEI of the direct parent undertaking of the financial entity*	char	20	No	Yes	Yes
	0070 - Date of last update	date	0	No	No	No
	0080 - Date of integration in the Register of information	date	0	No	No	No
	0090 - Date of deletion in the Register of information	date	0	No	No	No
	0100 - Currency	char	3	No	No	Yes
	0110 - Value of total assets - of the financial entity	money	0	No	No	Yes

There is no c0120 in the definition it goes up to c0110

Top 12 - v8826_m – LEI Mask validity

Rule is
match({tB_01.02, c0060}, "^[A-Z0-9]{18}[0-9]{2}$")
Means:
- 18 characters A-Z or 0-9
- Followed by 2 characters 0-9
20 characters in total

Example
"detailedFeedback": [
    "templateCode,rowCode,columnCode,ruleCode,message,offendingValue",
    "b0102,2,c0010,v8826_m,Value should be in valid LEI format,9322330961"
]

Parameter.csv, FilingIndicators.csv

parameters.csv - order of the headers is important – name first, value later

```
name,value
entityID,rs:DUMMYLEI123456789012.CON
refPeriod,2024-12-31
baseCurrency,iso4217:EUR
decimalsInteger,0
decimalsMonetary,-3
```

FilingIndicators.csv
- order of the headers is not important
- reported, values allowed are 1, true
- templateIDs values are in capitals

FootNotes.csv
- Supported by xbrl – we ignore it

```
templateID,reported
B_01.01,true
B_01.02,true
B_01.03,true
B_02.01,true
B_02.02,true
B_02.03,true
B_03.01,true
B_03.02,true
B_03.03,true
B_04.01,true
B_05.01,true
B_05.02,true
B_06.01,true
B_07.01,true
B_99.01,true
```

Table.csv files

- Filename must be in lower case – e.g. b_01.01.csv
- Column names can come in any order
- Column names are case-sensitive in lower case
- The first row in a table is the header row. Each cell in the header row MUST not be empty – 801 rule.
- Empty table.csv file – devoid of any data is allowed – means nothing to report
- "" can be used even if not necessary to enclose the cells.
- CRLF is optional in the last row whichever than one might be.
- Decimals suffix – e.g. 78920030d-4 disallowed
- Data for table.csv (and report.json, parameter.csv, FilingIndicators.csv) must be in UTF-8, if not so 306 error is raised.

More on table.csv files – file exists with data

Good file - all columns exists in the file and in table schema:

c0010	c0020	c0030	c0040	c0050	c0060
635400EWECOAKJOHRI84	Godzilla Heavy Industries	eba_GA:IE	eba_CT:x309	Central Bank of Ireland	31/03/2025

Also **good file** - one column is missing (c0050) but the rest exists in table schema:

c0010	c0020	c0030	c0040	c0060
635400EWECOAKJOHRI84	Godzilla Heavy Industries	eba_GA:IE	eba_CT:x309	31/03/2025

Also **good file** - only header no data:

c0010	c0020	c0030	c0040	c0050	c0060

Not good file - if file contains extra column which doesn't exist in table schema (c0500)

c0010	c0020	c0030	c0040	c0050	c0060	c0500
635400EWECOAKJOHRI84	Godzilla Heavy Industries	eba_GA:IE	eba_CT:x309	Central Bank of Ireland	31/03/2025	TEST

Not good file - if file header don't have column_name (,,)

c0010		c0020	c0030	c0040	c0050	c0060
635400EWECOAKJOHRI84	TEST	Godzilla Heavy Industries	eba_GA:IE	eba_CT:x309	Central Bank of Ireland	31/03/2025

Thank you!