DORA – ROI Guidelines for Effective Submission

The EBA website provides comprehensive information regarding the preparations for reporting of the Digital Operational Resilience Act (DORA) Registers of Information (RoI). Below is a summary of the key details pertaining to the RoI submission process. Each step outlines the necessary tasks to prepare a submission file that can be successfully uploaded to the RoI submission portal of the relevant Competent Authority (CA).

In Q1 2025, ahead of the RoI submission date, the Central Bank will also publish further information on how to submit Registers of Information through the CBI Portal.

Populating the RoI template is typically a highly manual process that involves a number of steps. Due to the manual nature of the process it may be prone to error and therefore it is important that validation checks are completed across the populated template before submission.

KPMG can provide trusted advisory support for the final preparation and submission process. For more information on how KPMG can assist you, please reach out to the key contacts below.

For your ease of reference, we have included guidelines below to support the manual submission process.

01 If this is the financial entity's first time submitting a Register of Information, go to EBA website **here** to obtain the standard template for recording required DORA information.

02 Click on **this link** to download a zip file and extract the annotated excel template for DORA, titled - "20241217 Annotated Table Layout DORADORA 4.0.xlsx". This file serves as the "human-readable" template for populating the DORA Register of Information.

03 Fill in the required information in the RoI template in line with the instructions as per the Implementing Technical Standards (ITS) with regard to standard templates for the register of information and carry out your internal review process of the RoI to ensure the principles of data quality are adhered to (see step 4).

04 Review the 15 content CSV files to be uploaded, and perform four types of validation rules as set out in the spreadsheet **here** and described in the PDF document **here**.

05 Click on **this link** to download a zip file and extract the "sample documents" for DORA – located in the "instances xBRL-CSV" folder. This folder contains an example of the file structure and contents to be uploaded to the CA portal as part of RoI submission. Further details on this structure and contents can be found from page 2 onwards at **this link**.

06 You will need to generate content based on your input RoI template filled in in step 3 similar to that downloaded and unzipped in step 5. Note that 'reportPackage.json' and 'report.json' do not require any changes. These files are designed to be interpreted by the CA portal, which facilitates understanding and processing the content submitted. All other files (15 RoI content files and two configuration files) should be tailored for your entity(entities) according to the instructions provided from page 2 onwards in **this document**.

07 Sanitise the 15 content CSV files by removing any column and row descriptions. For guidance on what needs to be removed, refer to the example submission file referenced in step 5 to understand the desired format of the final content files to be zipped/ compressed in the submission file. Data processing tip: You should sanitise content in a copy of the RoI excel spreadsheet that you have populated in step 3 and save each of the 15 csv files down separately as CSV files. This method of content CSV creation will help to avoid data validation issues arising.

08 Update the "parameters.csv", updating for your entity ID, fiscal period and reporting currency.

09 By default, FilingIndicators.csv indicates that the submitting entity plans to upload all 15 content CSV files. This file can be left as is, in its default state.

10 Copy the CSV files which have been updated/ created in steps 6 to 9 above. Ensure JSON files referenced in step 6 are also present and ensure folder structure is in line with example provided by EBA (described in step 5).

11 Compress/ zip the folder structure described in step 10, using the naming convention described in the validation rules from step 4.

12 There is guidance in an FAQ document **here** which may capture specific questions in relation to the submission process.
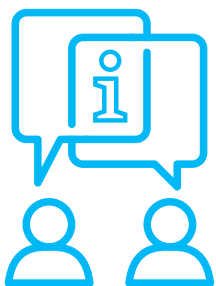
Additional useful links:

There are several useful files available on the EBA website to assist FEs in preparing the Register of Information. These include:

ITS on RoI - Annex 2 list of licensed activities for data point model updated to reflect DPM V4.0: This document helps firms identify the licensed activities relevant to their type of entity. It clarifies which activities may appear in scope for their entity but may not actually be applicable to their industry.

List of possible values for all data fields with drop downs:
This file provides a user-friendly list of dropdown values to select from, making it easier to populate the required fields. It can also help in understanding what content is needed and where it should be placed.

How can KPMG help?

KPMG has a dedicated Technology Risk Consulting team who works with small, medium and large organisations across the financial services sector to provide a range of different services. This includes extensive DORA design and implementation experience as well as ensuring firms have the appropriate systems, policies, procedures and controls to support compliance with regulatory expectations and requirements.

We can help you with various aspects of your DORA journey, including:

- Assist with the design and implementation of the ICT Risk Management Framework and supporting documents in place to comply with DORA.

- Assist with the preparation, review and submission of the Register of Information.

- Provide an independent review of Financial Entities (FEs) DORA programme as well as deep dives across specific DORA areas.

- Provide accessible insights relating to compliance with DORA.

- Develop and facilitate training sessions on DORA to promote understanding and improve implementation.

- Develop a target operating model to support your DORA programme transition into BAU.

- Advise on assurance and compliance models to ensure continued DORA compliance.

Contact our team

If you would like to discuss how KPMG can provide guidance and support on your DORA compliance journey, please get in touch with our Technology Risk Consulting Team below. We'd be delighted to hear from you.

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