

WELCOME TO

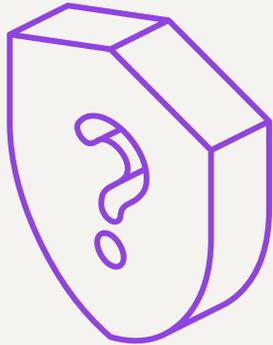
# DORA ROI Demystified



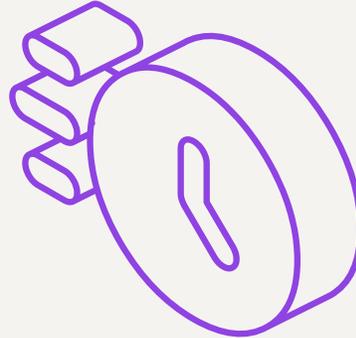
**With Fiona Jelly**  
CEO, Complyfirst



# Objectives for today



**Clarify the rules:**  
What the DORA ROI contains and how it's structured.



**How to complete ROI:**  
The 4 keys, supply chain mapping, and data quality.



**Lessons from DORA 1.0:**  
The common mistakes firms made – and how to avoid them.



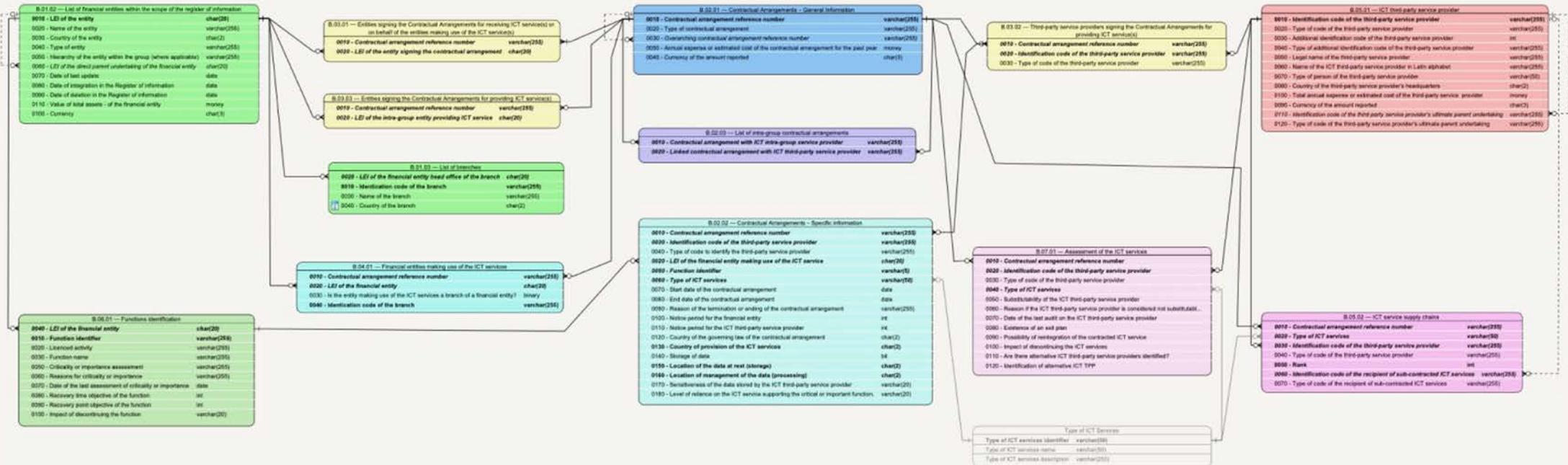
# Why the Register of Information (ROI) exists

-  Ensures your firm has **clear oversight** of ICT third party risks
-  Gives supervisors **visibility** into your ICT dependencies
-  Enables **effective supervision**, esp. of critical ICT providers

# The ROI structure

The ROI is composed of 15 tables linked by 4 keys – and mapped across your ICT supply chain.

| B.01.01 – Financial entity maintaining the register of information |              |
|--|--------------|
| 0010 - LEI of the entity maintaining the register of information   | char(20)     |
| 0020 - Name of the entity  | varchar(255) |
| 0030 - Country of the entity                                       | char(2)      |
| 0040 - Type of entity  | varchar(255) |
| 0050 - Competent Authority   | varchar(255) |
| 0060 - Date of the reporting                                       | date         |





# What the ROI contains

-  1 set of templates for all firms
-  15 tables
-  100's of pages of EBA guidance
-  XBRL-CSV format only

## DORA Register of Information

1. Entity details
2. List of entities
3. List of branches
4. Contract overview
5. Contract details
6. Intra-group contracts
7. Signing entities
8. ICT providers
9. In-group providers
10. Service users
11. Subcontractors
12. Supply chain
13. Functions list
14. ICT assessment
15. Definitions used



# How to complete the ROI

Where to start



## 1. List all ICT services & functions

- **Capture all ICT services** from third-party + in-group providers
- List all **business + operational functions** and talk to them
- This is your initial **inventory**



## 2. Internal assessment

- Identify **critical/ important** functions (Art 3(22) DORA)
- **Additional info** is needed for these (risk assessment, supply chain, subcontractors, concentration, exit strategy)
- Identify **material sub-contractors** (Art 30 (2) DORA)
- **Rank providers** (Direct = 1, Sub-contractors = 2-3)



## 3. ICT supply chain

- Map each ICT service to its **service type** (S01 – S19) Annex III
- Capture your **supply chain**: direct providers + subcontractors
- **Link everything together** in the same supply chain



## 4. Correctly capture the 4 keys

- Record **contract ref numbers** (internal + external)
- Capture **LEI's** for signing entities + direct ICT providers
- Assign **ICT service type** codes (S01 – S19) from Annex III
- Create consistent **function IDs** for every function

# Scope + document your ICT supply chain



## Scope

1. All ICT providers
2. **Extra details** required when the ICT provider supports a critical or important function
  - Risk assessment
  - Subcontractors
  - Concentration risk
  - Exit strategy

## What to record:

To clearly document the supply chain, you must:

- **Contract ref number:** between your firm and the direct ICT TPP.
- **Assign ICT service type** (Annex III, S01 – S19)
- **Rank providers:**
  - Rank 1 = Direct provider
  - Rank 2,3 = Material subcontractors (Upto the last material subcontractor in the chain)
- **Links:** Show how each provider fits within the same supply chain

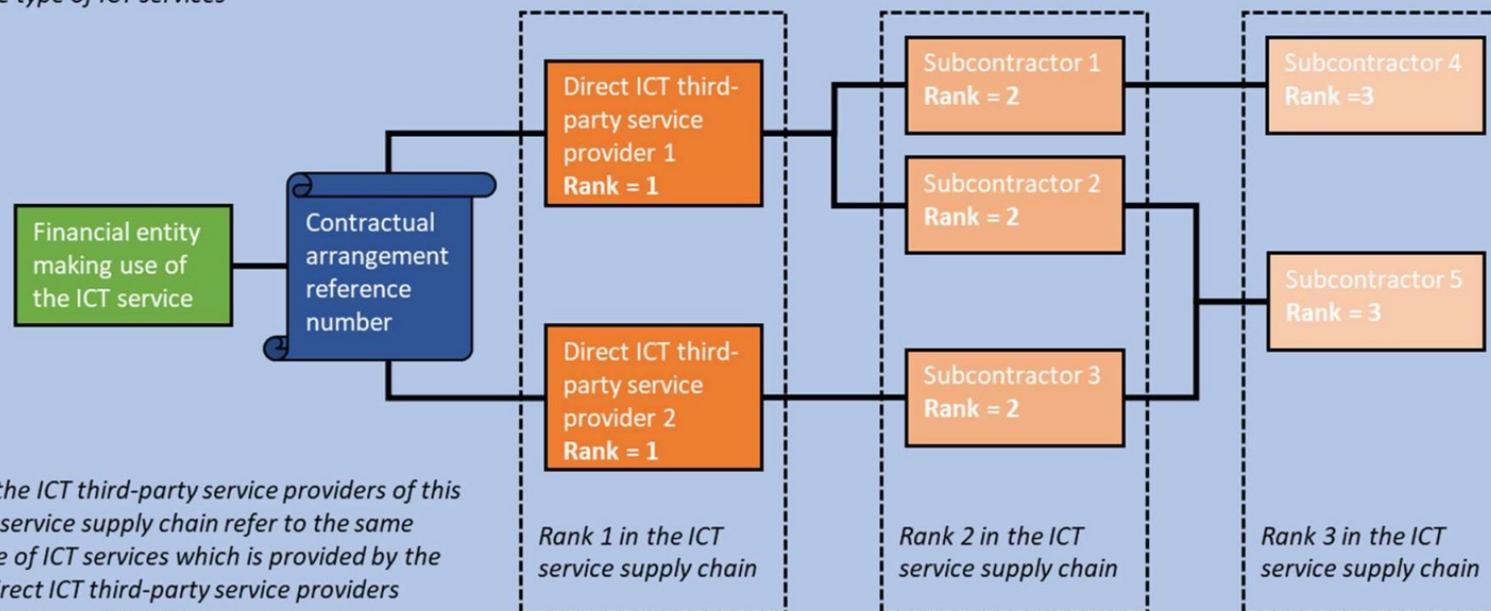
# Example of an ICT service supply chain



## ICT service supply chain

The ICT service supply chain is identified by the combination of both:

- the contractual arrangement reference number between the financial entity and the direct ICT third-party service providers;
- the type of ICT services



All the ICT third-party service providers of this ICT service supply chain refer to the same type of ICT services which is provided by the 2 direct ICT third-party service providers to the financial entity

# The 4 keys that link everything together



## 01

### Contract reference number

- Unique internal ID assigned to each ICT contract
- Must remain consistent across all ROI tables

## 02

### Legal entity identifier (LEI)

- 20 character code, unique to each entity
- Required for your contracting entity + each direct ICT provider

## 03

### Function identifier

- Unique function ID created from: LEI + licensed activity + function
- Must remain consistent across all tables.

## 04

### ICT service type

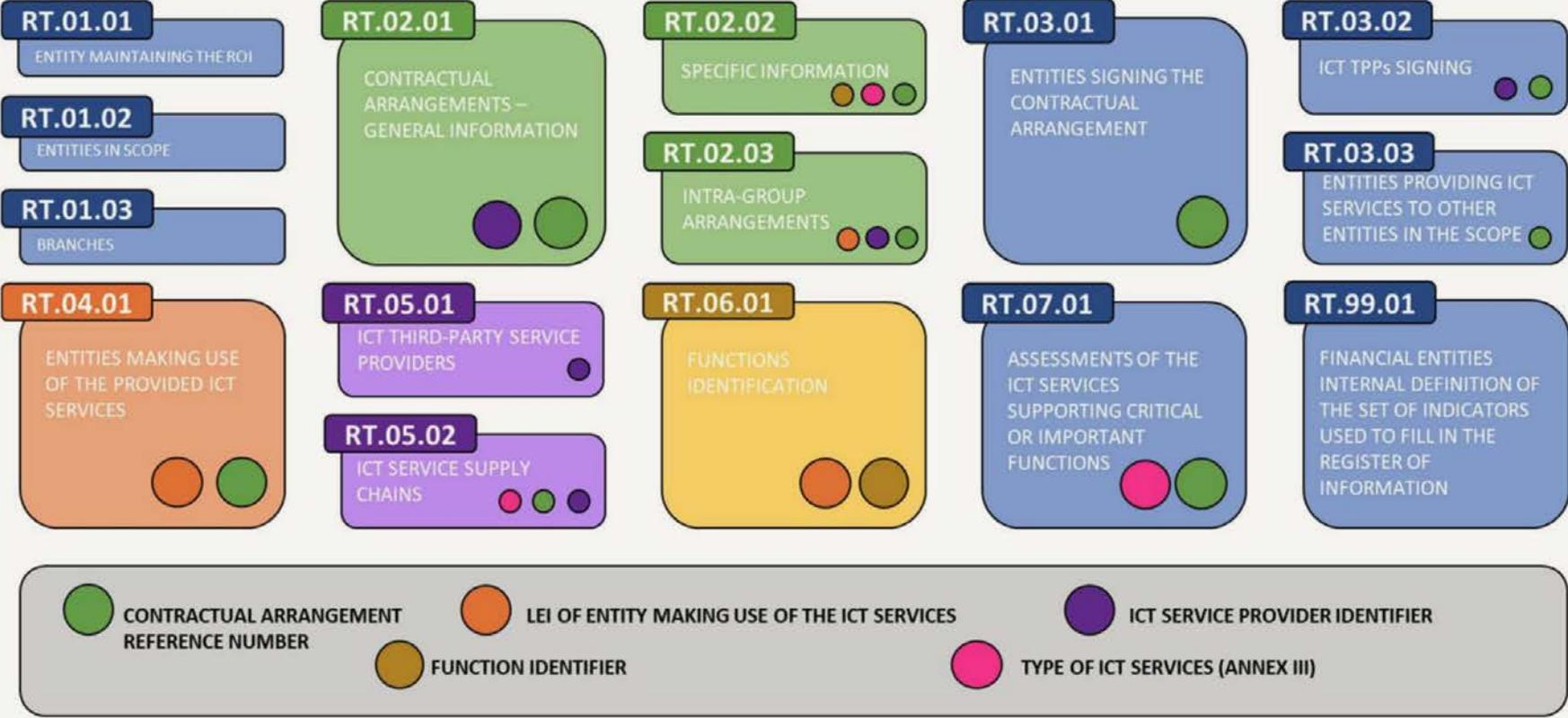
- One of 19 ICT service types (S01 – S19) from Annex III
- Drives which fields + validations rules apply

| Function identifier | LEI                      | Licensed activity | Function name | ICT service |
|---------------------|--------------------------|-------------------|---------------|-------------|
| F1                  | 1234567890DU<br>MMYLEI01 | Payments          | Sales         | Salesforce  |
| F2                  | 1234567890DU<br>MMYLEI01 | E-money           | Sales         | Salesforce  |

| Identifier | Type of ICT Service      | Description  |
|------------|--------------------------|--|
| S01        | 1.ICT project management | Provision of services related to Project Management Officer (PMO).                             |
| S02        | 2.ICT Development        | Provision of services related to: business analysis, software design and development, testing. |

# How the keys link across templates

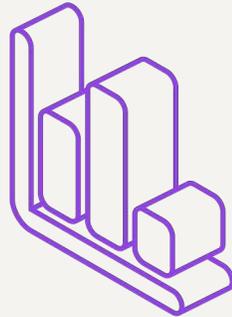
Illustration 1: Structure of the Register of Information





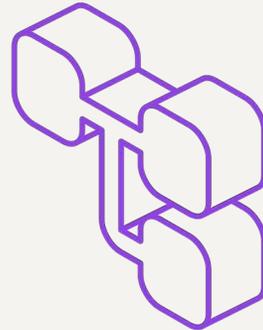
Don't forget...

# Data quality is everything



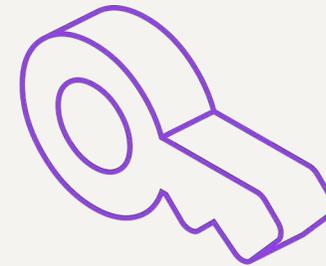
## Data principles:

accuracy, completeness,  
consistency, integrity,  
uniformity, validity



## Clear taxonomies:

Create clear taxonomies of  
functions so each ID clearly  
distinguishes between  
internal functions



## Consistency across the 4 keys:

Check for consistency  
across the 4 keys at  
entity and group level

# Lessons learned from DORA 1.0

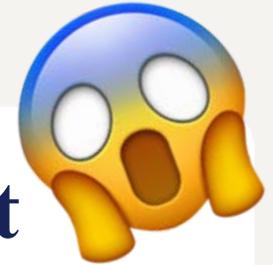


# 93.5% of firms failed the dry run

**Participation:** Nearly 1,000 firms across the EU

**Pass rate:** Only 6.5% of the ROI's submitted passed all 116 data quality checks

[Key findings from the 2024 ESA's Dry Run Exercise](#)



## EuropeanPensions.net

### Just 6.5% of DORA dry run registers passed all data quality checks – ESAs

By Natalie Tuck 18/12/24

Just 6.5 per cent of the registers analysed in the dry run exercise on reporting the registers of information under the Digital Operational Resilience Act (DORA) successfully passed all quality checks, the European Supervisory Authorities (EBA, EIOPA and ESMA – the ESAs) have revealed.

However, the ESAs' summary report on the exercise revealed that 50 per cent of the remaining registers failed less than five out of 116 data quality checks.

Around 1,000 financial entities across the EU submitted data, and the ESAs said it was "in line with expectations".

The ESAs announced the dry run exercise on the reporting of registers of information in April 2024 to help the industry prepare for the DORA.



# What tripped firms up



## Missing mandatory data (86% of errors)

Key identifiers were missing: LEI's for parent entities and ICT providers, Function IDs, ICT service type, Country of provider, Supply chain details



## Not using the 4 keys correctly

Firms re-used values that must be unique (contract ref no, function ID etc) which prevents tables from linking correctly



## Not following the DPM (Data point model)

Didn't use the required drop-down values, used free text instead of the allowed codes, or didn't follow the official DPM structure



## FAQs differing from EBA guidance

Firms got stuck when newer FAQs superseded the EBA guidance and working with multiple files + packages.



## Missing supply chain details

Left supply chain fields blank, didn't identify subcontractors, didn't assign ranks, or didn't link providers correctly.



## Gap in compliance AND technical knowledge

Teams struggled to fix validation errors + existing vendors couldn't support or generate the correct files



# Key Takeaways

- ☑ Start early

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- ☑ Bring in the right experts

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- ☑ Get your vendor DD done

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- ☑ Secure XBRL-CSV tooling

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- ☑ Get references for vendors

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- ☑ Test, test, test

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- ☑ Document everything & create a run-book

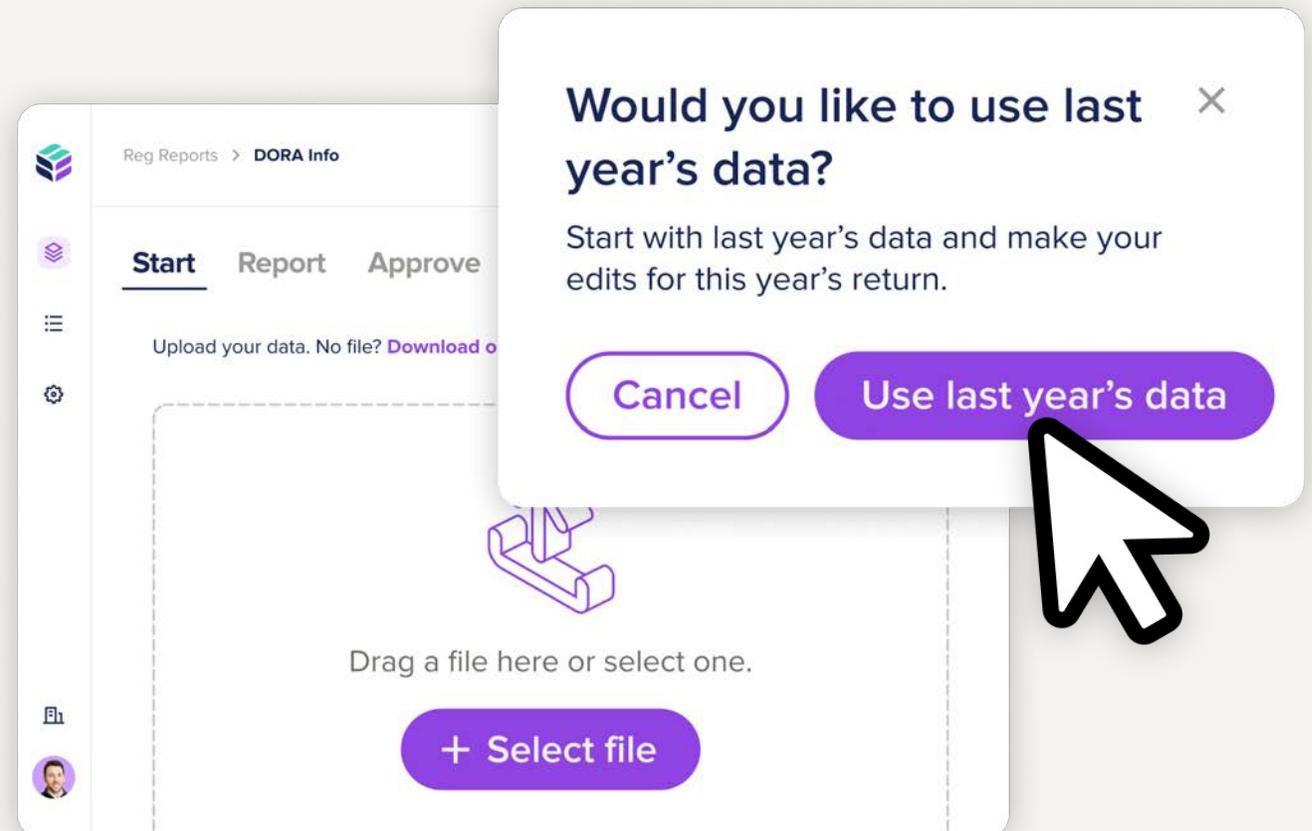
# How Complyfirst can help



How it works

# Easy data uploads

**Easy uploads & updates:**  
Use your own files or the EBA's templates – no reformatting. Reuse last year's data in one click, so you never start from scratch.





How it works

# EBA guidance built-in

**EBA Guidance built-in:** We pull guidance directly from the EBA and show it in the cell where you need it.

Reg Reports > DORA Info

Start Report Approve Su

B\_01.01 B\_01.02 B\_01.03 B\_02.01 B\_02.02  
B\_05.01 B\_05.02 B\_06.01 B\_07.01 1 error B\_99.01

Functions identification

| Function Identifier | Licensed activity | Function Name      | LEI             |
|---------------------|-------------------|--------------------|-----------------|
| F1                  | Payment Services  | Payment Process... | ABC1234567VZN18 |
| F2                  | Payment Services  | Data Processing    | ABC1234567VZN18 |

**EBA Guidance**

**Function Identifier**

The function identifier shall be composed by the letter F (capital letter) followed by a natural number (e.g. 'F1' for the 1st function identifier and 'Fn' for the nth function identifier with 'n' being a natural number). Each combination between 'LEI of the...



How it works

# Clear, real-time error messages

**Real-time, human-readable errors:** We validate your data as you work. When something's wrong, we translate the error message into plain English and tell you how to fix it.

Reg Reports > DORA Info

Start Report Approve Su

B\_01.01 B\_01.02 15 errors B\_01.03 B\_02.01 5 errors  
B\_03.03 B\_04.01 B\_05.01 1 error B\_05.02 1 error

### Validation Errors

| Sheet   | Row | Column | Notes                                    |
|---------|-----|--------|--|
| B_01.02 | 3   | A      | LEI must be exactly 20 uppercase alp...  |
| B_01.02 | 1   | G      | Date format must be YYYY-MM-DD           |
| B_02.01 | 2   | E      | Cell can not be left blank when other... |

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Contractual arrangements – General Information

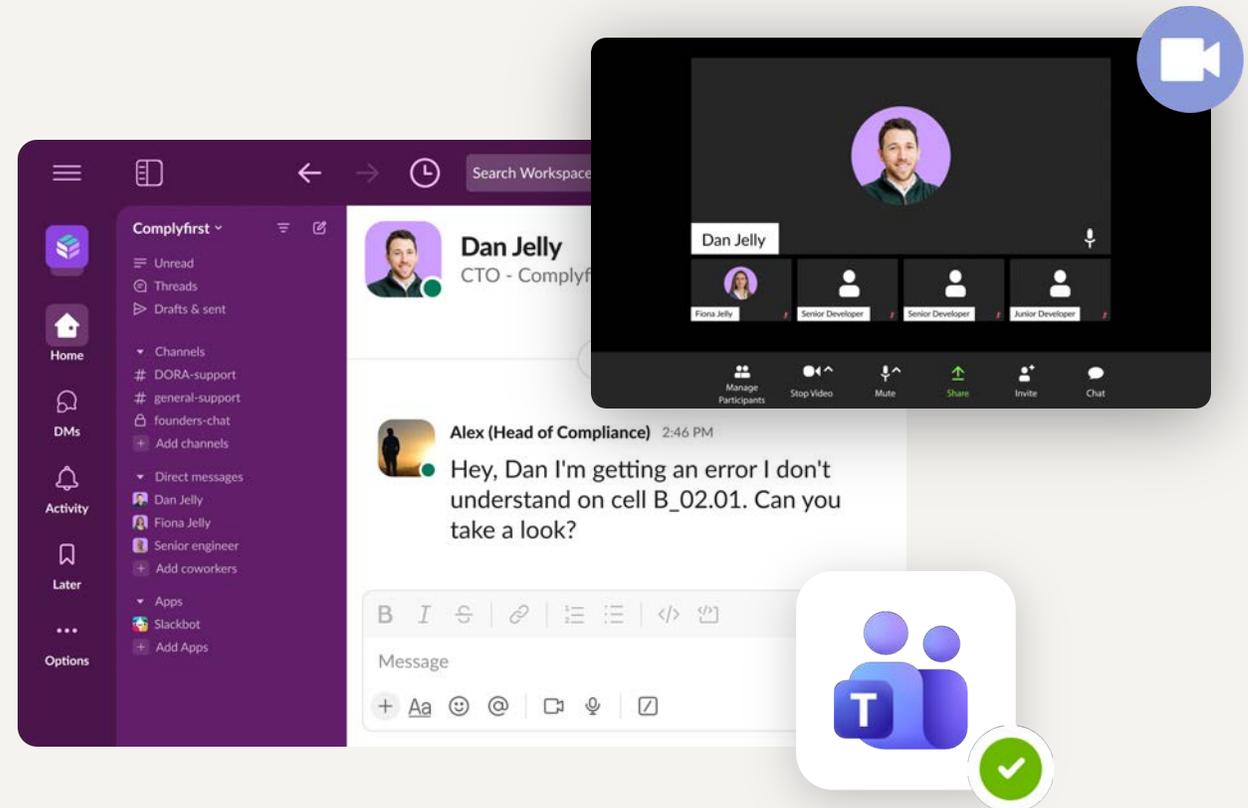
| Ref #    | Type           | Overall Ref #  | Currency | Annual Expense |
|----------|----------------|----------------|----------|----------------|
| CRN-1230 | Overarching... | Not Applicable | Euro     | 7670.53        |
| CRN-1231 | Standalone...  |                | Euro     |                |



How it works

# 1:1 expert support

**1:1 expert support:** Talk to us on Slack, Teams, or Zoom and get fast, practical help – especially on deadline day.





# What our clients say



*“What sets Complyfirst apart is its **ability to simulate a regulator’s review**”*



**DORA submitted within 24 hours**



Reporting time cut by 50%



Saving 100’s of hours across UK and Ireland



*“What took weeks, Complyfirst fixed in hours—**within 48 hours we were live, errors fixed and submitted... 10/10!**”*



**DORA submitted within 48 hours**



Reporting effort reduced by 90%



Scaled globally (UK, Ireland, Poland, Australia, Lithuania)

# Need help with your DORA ROI?



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# Abbreviations

**DORA = Digital Operational Resilience Act**

**EBA = European Banking Authority**

**ROI = Register of Information**

**XBRL = Extensible Business Reporting Language**

**ITS = Implementing Technical Standards**

**ICT = Information & Communications Technology**

**ICT TPP = ICT third-party service provider**