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New EBA Instant Payments Report

What you need to do before 9 April 2026



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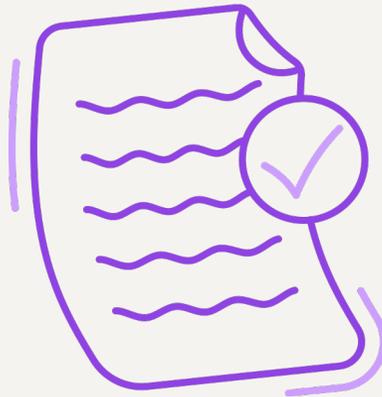
Dan Jelly
CTO, Complyfirst



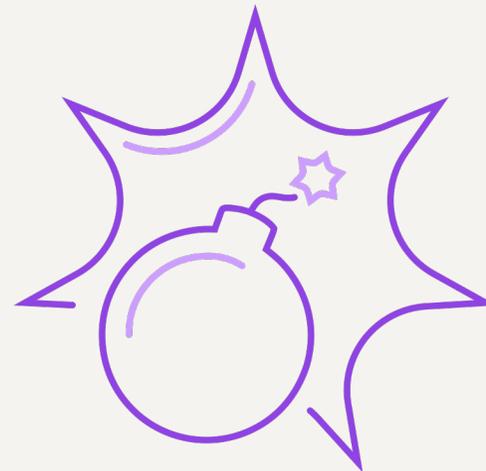
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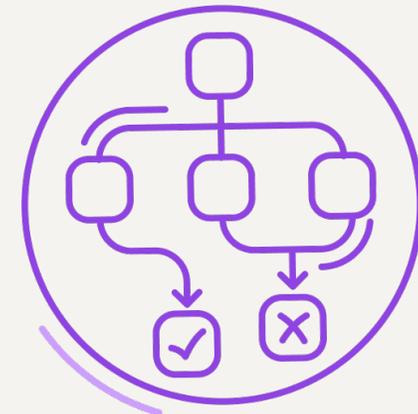
What we'll cover today



Overview of the new
Instant Payments Report



The grenades you need
to watch out for



How to complete this report
(each tab step-by-step)

Presented by



Sinead Halhed-Moran Walsh

Founder, Financial InnovateHER

- ✓ Built Financial InnovateHER, along with the core team, to advance women in financial services.
- ✓ Fintech INED & Chair, Advocate, Speaker & Judge across Irish public and private sectors.
- ✓ Barrister with 18+years experience in financial services.



Fiona Jelly

CEO & Founder, Complyfirst

- ✓ 12+ years in compliance at Goldman Sachs, Citi bank, and in Fintech.
- ✓ Barrister (England & Wales) and Certified Anti-Money Laundering Specialist.



Dan Jelly

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- ✓ 10years+ in FX and interest rates sales/trading at Goldman Sachs and CTO in Fintech.
- ✓ Self-taught engineer with economics background.



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LET'S POLL:

**Where are you at with your
IPR report? 🤔**



Overview



Instant Payments Report Overview

(Annual + retrospective requirement of 4 years)



Legal Basis

Art. 15(3) (SEPA Regulation (EU) No 260/2012), with ITS under Art. 15(5), as amended by the EU Instant Payments Regulation (EU) 2024/886.

Objective

Give regulators a clear view of instant payments pricing and sanctions-related rejects/freezes. Regulators will benchmark PSPs across the EU for pricing consistency and sanctions screening performance.

Description

Annual instant payments report on
(1) **Charges** for credit transfers (both instant and non-instant), payment account charges, and;
(2) **Rejection/freeze rates** due to EU sanctions or targeted financial restrictive measures (TFRMs).

Scope

- **Activity/Nexus:** Provision of SEPA credit transfers and/or SEPA instant credit transfers
- **Entity:** PSPs in euro member states and PSPs in non-euro member states where they offer euro credit transfers (e.g. a Polish PSP providing EUR SEPA credit transfers).

Submission

Generate the XBRL using the EBA templates, taxonomy and validation rules, then submit to your national competent authority.

Considerations

- **Backfill year 1:** Four reports (26 Oct–31 Dec 2022, then full years 2023–2025).
- **Cross-check:** Totals for transfers and accounts should align with other returns (e.g. Payment Statistics)

Data fields needed

There are 4 core templates (6 if you include non-euro member state firms):

- **Template 1.1 (Volumes):** SCT + SCT Inst transfers sent/received, transaction counts and total values, split by national vs cross-border
- **Template 2.1 (Charges):** fees charged for SCT + SCT Inst sent/received, split by national vs cross-border
- **Template 3 (Accounts):** total number of payment accounts and total account charges (incl. maintenance fees)
- **Template 4 (Sanctions):** Number and % of SCT Inst rejected/frozen due to sanctions screening, split national vs cross-border

Note: Templates are linked – totals and splits should reconcile across them.

Next steps

- **Map ownership:** Map which licensed entities/branches report to which CA (home vs host)
- **Separate sanctions:** Tag/extract “rejected/frozen” due to sanctions vs other fail reasons
- **Dry-run backfill:** Produce 2022 (partial), 2023, 2024 and 2025 early

DEADLINE

First submission 9 Apr 2026

FREQUENCY

Annual

FILE FORMAT

XBRL



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Watch out for...



Watch out for these grenades

01

Payment accounts are in scope + follow PSD2 definition

An account held in the name of one or more payment service users and used for the execution of payment transactions.



02

BUT... Only credit transfers are to be reported

Money remittance, card payments, and direct debits are all explicitly excluded.



03

Intermediated transfers

If you're processing a payment but don't hold the payers account, the transfer is not yours to report.



04

Parent & branch reporting

The EBA says branches must report to their host NCA and the parent entity reports to its home NCA.



05

Euro vs Non-Euro Member State PSPs

Euro PSPs report credit transfers in euro only.
Non-Euro PSPs report in their national currency and also in euro (2 extra tabs to complete)



06

Definition of charges

Exclude FX mark-up and currency conversion fees from all figures.



07

Rejected transactions

Only report rejections caused by EU targeted financial restrictive measures (TRFMs). Rejections for any other reason are excluded.



08

ECB payment statistics alignment

The IPR ITS uses the same terminology as the ECB regulation on payment statistics - check that your returns align (sisters, not twins).





How to complete the IPR (step-by-step)



General instructions

01

Euro PSPs: you report 4 templates - S01.01, S02.01, S03.00 and S04.00

02

Non-euro PSPs: you report all 6 templates

03

Euro transfer charges: report charges in euro regardless of what currency the fee was collected in

04

Non-euro transfer charges: report charges in national currency regardless of what currency the fee was collected in (use ECB rate to convert if needed)

05

Currency conversion fees: these must be excluded from all charges across every template

06

Reference periods: each full set of templates must be completed separately per reporting period.



Total no of payment accounts to align with payment stats report



Tab S01.01

No. and value of credit transfers and instant credit transfers (national currency)

		Credit transfers sent				Credit transfers received			
		Number of credit transfers		Value of credit transfers		Number of credit transfers		Value of credit transfers	
			of which: instant credit transfers		of which: instant credit transfers		of which: instant credit transfers		of which: instant credit transfers
		0010	0020	0030	0040	0050	0060	0070	0080
Total		0010							
of which: initiated electronically via online banking		0020							
of which: initiated electronically via mobile payment solutions		0030							
of which: initiated in a paper-based form		0040							
Breakdown by location of PSPs	National	0050							
	Cross-border	0060							
Breakdown by charges	Free of charge	0070							

Sent transfers

Enter total no. and value of all credit transfers sent, then complete the instant breakdown. No. of transfers must be whole numbers, values can be to 2 decimal places.

Break down sent totals

By initiation channel, national vs cross-border, free vs charged, consumer vs non-consumer - complete instant breakdown for each.

Rules on sent breakdowns

Initiation rows do not need to add up to your total. Each transfer in a batch counts individually (not one figure)

Received transfers

Requires less detail – totals and free vs charged and instant breakdown on every row



Tab S01.02

No. and value of credit transfers and instant credit transfers
(Euro)

		Credit transfers sent				Credit transfers received			
		Number of credit transfers		Value of credit transfers		Number of credit transfers		Value of credit transfers	
		of which: instant credit transfers		of which: instant credit transfers		of which: instant credit transfers		of which: instant credit transfers	
		0010	0020	0030	0040	0050	0060	0070	0080
Total		0010							

Non-Euro PSPs only

This tab captures your euro denominated transfers separately from your national currency figures in S01.01. Report all figures in euro.

Totals only (no breakdowns)

Enter total number and value of sent and received transfers and instant breakdown on every row.



Tab S02.01

Charges for credit transfers and instant credit transfers (National currency)

	A	B	C	D	E	F	G	H	I	J
1	Back to ToC									
2	S 02.01 - CHARGES FOR CREDIT TRANSFERS AND INSTANT CREDIT TRANSFERS (NATIONAL CURRENCY)									
3										
4					Credit transfers sent		Credit transfers received			
5					Value of charges for credit transfers		Value of charges for credit transfers			
6					of which: instant credit transfers		of which: instant credit transfers			
7					0010	0020	0030	0040		
8	Total				0010					
9	of which: initiated electronically via online banking				0020					
10	of which: initiated electronically via mobile payment solutions				0030					
11	of which:									
12	Breakdown of									
13	Breakdown of									
14	Breakdown of									
15	Breakdown of									
16	Breakdown of									
17	Breakdown of									
18	Breakdown of									
19	Breakdown of									
20	Breakdown of									

Sent transfer charges

Enter total value of all credit transfer charges, then complete the instant breakdown.

Break down sent charges

By initiation channel, national vs cross-border, free vs charged, consumer vs non-consumer - complete instant breakdown for each.

Received transfer charges

Total charges only – no further breakdowns needed.



Tab S02.02

Charges for credit transfers and instant credit transfers (Euro)

	A	B	C	D	E	F	G	H	I	J
1	Back to ToC									
2	S 02.02 - CHARGES FOR CREDIT TRANSFERS AND INSTANT CREDIT TRANSFERS (EURO)									
3										
4					Credit transfers sent			Credit transfers received		
5					Value of charges for credit transfers		Value of charges for credit transfers			
6					of which: instant credit transfers		of which: instant credit transfers			
7					0010	0020	0030	0040		
8	Total				0010					
9										
10										
11										
12										
13										
14										
15										
16										
17										
18										

Non-euro PSPs only

This tab captures your euro denominated transfers separately from your national currency figures in S01.01. Report all figures in euro.

Totals only (no breakdowns)

Enter total value of charges for sent and received transfers and instant breakdown on every row.



Total no of payment accounts to align with payment stats report

Tab S03.00

No. of payment accounts and total charges
(National currency)

	A	B	C	D	E	F	G	H	I
1	Back to ToC								
2	S 03.00 - NUMBER OF PAYMENT ACCOUNTS AND TOTAL CHARGES (NATIONAL CURRENCY)								
3									
4									
5					Number of payment accounts	Value of charges for payment accounts			
6							of which: maintenance of payment accounts		
7					0010	0020	0030		
8	Total	0010							
9									
10									
11									

Total no. of payment accounts

Report total no. of all payment accounts as at the end of the reporting period.

Value of charges per account

Report total fees paid per account – use the statement of fees where possible OR total fees paid by the account holder. Exclude currency conversion fees.

Value of maintenance charges

Report the basic account operation fee only, use fee information doc where possible OR use the charge levied to operate the account.



Tab S04.00

No. of rejected instant credit transfers

	A	B	C	D	E	F	G	H
1	Back to ToC							
2	S 04.00 - NUMBER OF REJECTED INSTANT CREDIT TRANSFERS							
3								
4								
5					Number of instances when instant credit transfers were not executed or funds were frozen, as			
6					Payee's PSP		Payer's PSP	
7					0010		0020	
8	Total				0010			
9	Breakdown by location of PSPs		National	0020				
10			Cross-border	0030				

What to report

Report every instance where an instant credit transfer was blocked or funds frozen due to EU sanctions (don't include any other reasons for rejections).

Report from both perspectives

You must complete this tab as both the payer's PSP and the payee's PSP – these are separate columns and both are mandatory.

What counts as a rejection

- Transfers you stopped before execution
- Funds frozen before a transfer was initiated
- Funds frozen after a transfer arrived at the payee's account

Break down by geography

Report rejections across 3 categories – all transfers combined, national only, and cross-border only. Transfers between your own customers must be included.



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**Want a 1:1 call with us for
some last minute support?**



ASK US (ALMOST) ANYTHING:

Q&A



Resources

☑ **EBA technical standards:**

<https://www.eba.europa.eu/publications-and-media/press-releases/eba-publishes-its-draft-final-technical-standards-reporting-data-charges-credit-transfers-and>

☑ **Complyfirst Excel template:**

Drop us an email & we'll share it

☑ **Complyfirst one page overview:**

<https://complyfirst.co/resources/files/reporting-snapshot-ipr>

Slides + webinar recording will follow later today.



Got feedback for us?

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Webinar Feedback

What was your biggest takeaway from the session? What could we improve for future webinars?

Submit





And, your first IPR submission is *on us!* 🚀



We'll handle your first IPR end-to-end for free.

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Thank you

Let's stay in touch



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