



Methodology for determining the institutions that are eligible for derogations within the AnaCredit reporting framework

According to Article 16 (1) of Regulation (EU) 2016/867 national central banks can grant derogations to "small" reporting agents, provided that the **combined contribution** of all reporting agents that are granted a derogation **to the total outstanding amount of loans reported** pursuant to Regulation (EU) No 2021/379 of the European Central Bank (ECB/2021/2) by all reporting agents resident in the reporting Member State **does not exceed 2 %**.

On this basis, the Deutsche Bundesbank has sorted all institutions that are required to report their monthly balance sheet statistics in Germany (according to Regulation (EU) no. 2021/379) by their share in the total outstanding amount of loans.

These shares (of the total outstanding amount of loans) have been cumulated. Therefore, the institutions could be identified, whose combined share does not exceed 2 % of the total outstanding amount of loans. To determine the "small" institutions, data from the monthly balance sheet statistics as of **31st December 2025** was used¹.

The following positions of the monthly balance sheet statistics are included in the calculation of the total outstanding amount of loans of an institution:

A1 100 05	Loans and advances to banks (MFIs)
A1 100 07	Holdings of bills of exchange of banks (MFIs)
A1 100 09	Balances with central banks
B1 500 04	Loans and advances to non-banks (non-MFIs)
B1 500 06	Holdings of bills of exchange of non-banks (non-MFIs)
HV11 130	Equalisation claims on general government

The evaluation of the data of the monthly balance sheet statistics as of 31st December 2025 showed that the average of the five largest "small" institutions (i.e. the five institutions that do not exceed the 2 % limit and thus are granted derogations) regarding the total outstanding amount of loans amounts to 760.3 million euros.

¹ Prospectively the re-determination of institutions that are eligible for derogations will occur annually in the first quarter of a year based on the monthly balance sheet statistics as of 31st December of the preceding year.