

ECB ICAAP & ILAAP

Updates on:

ECB Guide to the internal capital adequacy assessment process (ICAAP)

ECB clarification on ICAAPs and ILAAPs and respective package submissions

Grant Thornton Financial Services

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01 | Introduction

Background & Purpose

The ECB's July 2026 Clarification builds on the existing ICAAP Guide by reinforcing supervisory expectations and providing greater clarity on how ICAAP & ILAAP should be implemented, governed and evidenced in practice.



Overview

In July 2026, the European Central Bank (ECB) published its Clarification on **Internal Capital Adequacy Assessment Process (ICAAP)**, **Internal Liquidity Adequacy Assessment Process (ILAAP)** and the related submissions packages, providing additional guidance on how significant institutions are expected to implement and demonstrate their frameworks.

The publication **does not introduce a new regulatory framework**. Instead, it complements the existing ECB ICAAP and ILAAP Guide (2018) by clarifying supervisory expectations in areas where institutions have demonstrated inconsistent implementation during supervisory reviews.



Supervisory Focus

The Clarification reinforces the expectation that ICAAP and ILAAP should operate as **embedded management frameworks**, supporting strategic planning, capital allocation and day-to-day decision-making rather than serving solely as regulatory reporting exercises.

Accordingly, institutions are expected to demonstrate that capital and liquidity assessments (CAS/ LAS) are actively incorporated into governance processes, business decisions and risk management practices.



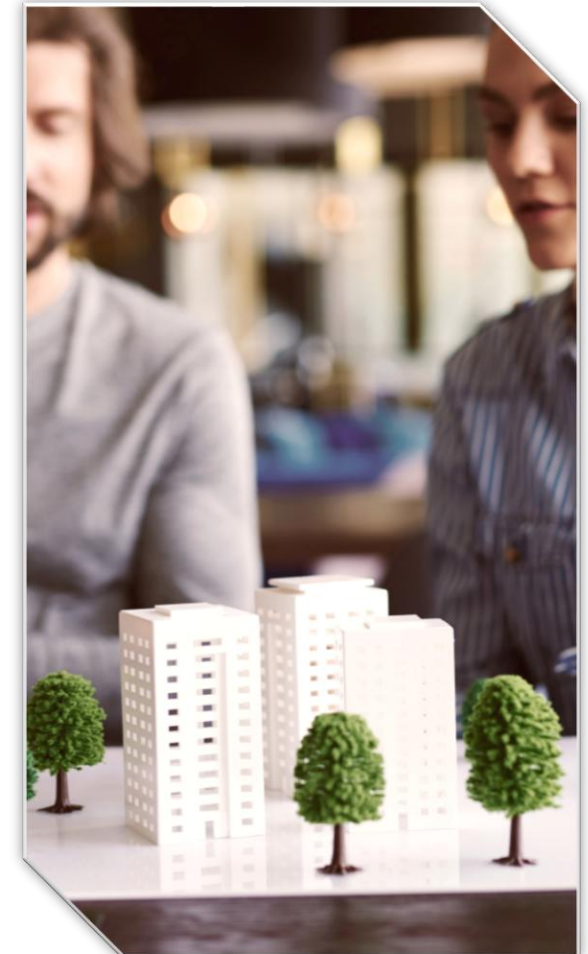
Regulatory Relevance

The Clarification supports the ECB's assessment of institutions under the **Supervisory Review And Evaluation Process (SREP)** with ICAAP serving as an important input into the **Pillar 2 capital determination process**.



Key Takeaway

The ECB's July 2026 clarification reinforces existing supervisory expectations regarding how ICAAP and ILAAP are governed, applied and evidenced in practice, without setting additional expectations or requirements.



The Seven ICAAP Principles

The ECB ICAAP Guide is structured around seven supervisory principles, which collectively define the characteristics of an effective ICAAP framework. Together, these principles establish the ECB's expectations regarding governance, capital adequacy, risk management and resilience.

1



Principle 1 – Management body & governance

The management body is expected to take overall responsibility for ICAAP, ensuring appropriate governance arrangements, oversight and accountability.

2



Principle 2 – ICAAP as part of the overall management framework

ICAAP should be fully integrated into the institution's governance, business strategy, risk management framework and decision-making.

3



Principle 3 – Capital adequacy from two perspectives

The ICAAP should support the institution's continuity by ensuring adequate capital from both a regulatory (Normative) and economic perspective. The ECB emphasizes the interaction between the two perspectives, which should jointly inform capital planning and risk management decisions.

4



Principle 4 – Identification of all material risks

Institutions are expected to maintain a comprehensive and regularly updated risk inventory, ensuring all material risks are identified and appropriately considered within the ICAAP framework.

5



Principle 5 – Quality and definition of internal capital

Internal capital should be clearly defined, prudently determined and capable of absorbing losses while supporting the institution's continuity.

6



Principle 6 – Risk quantification & independent validation

Risk measurement approaches should be transparent, reliable, proportionate and supported by appropriate data, assumptions and validation processes.

7



Principle 7 – Regular stress testing

Stress testing should assess the institution's key vulnerabilities under severe but plausible conditions and support capital planning and management decision-making.



Transition to the Clarification Paper

The July 2026 Clarification does not amend the seven principles or introduce additional supervisory requirements. Instead, it clarifies how existing expectations should be implemented, governed and evidenced in practice. The following slides present the principal areas of clarification and their practical implications for supervised institutions.

02 | ECB Guide to the internal capital adequacy assessment process (ICAAP)

Internal review and ICAAP architecture

A sound ICAAP framework requires comprehensive internal review across all relevant dimensions, supported by a clearly documented architecture demonstrating the interconnections between its individual components.



Internal review must cover all key dimensions

Regular internal review must cover qualitative and quantitative aspects, including ICAAP outcomes, stress-testing framework, risk capture, and data aggregation.



Three lines of defense must conduct the review

Reviews must be conducted by the **business lines** and the **independent control functions** (risk management, compliance and internal audit), in accordance with their respective roles and responsibilities.



Document the overall ICAAP architecture

Institutions should document how the key ICAAP components fit together within the overall framework.



Architecture description must be comprehensive

The description should explain the high-level structure and connections between **strategy, capital plans, risk identification, risk appetite, limit systems quantification methodologies, stress testing and management reporting.**

Key Focus Areas



Confirm internal review covers all key ICAAP dimensions

Evidence coverage of ICAAP outcomes, stress-testing, risk capture, data aggregation and validation processes.



Gap-check architecture clarity

Assess whether ICAAP elements are explicitly connected or whether they exist in silos.



Escalate findings and track remediation

Ensure review outcomes are reported to senior management and the management body, with identified weaknesses translated into timely corrective actions.

Management buffers: from expectation to discretion

The ECB clarifies that management buffers are determined by the bank's own risk appetite and capital planning. They support the sustainable operation of the business model but do not constitute new minimum capital requirements or available capital.

ECB Clarifications

01	Management buffers are owned by the institution	▪ Reflect the bank's own assessment of capital needed to operate sustainably ▪ Determined through internal governance and ICAAP ▪ May differ across institutions depending on business model and risk profile
02	Not a supervisory requirement	▪ Management buffers are not Pillar 2 Guidance ▪ They are not regulatory minimum capital ▪ They should not be interpreted as available capital ("headroom")
03	Integrated into capital management	Management buffers should remain embedded in: ✔ Risk appetite framework (RAF) ✔ Stress testing ✔ Management decision making ✔ Capital planning ✔ Recovery planning

Implications for Banks

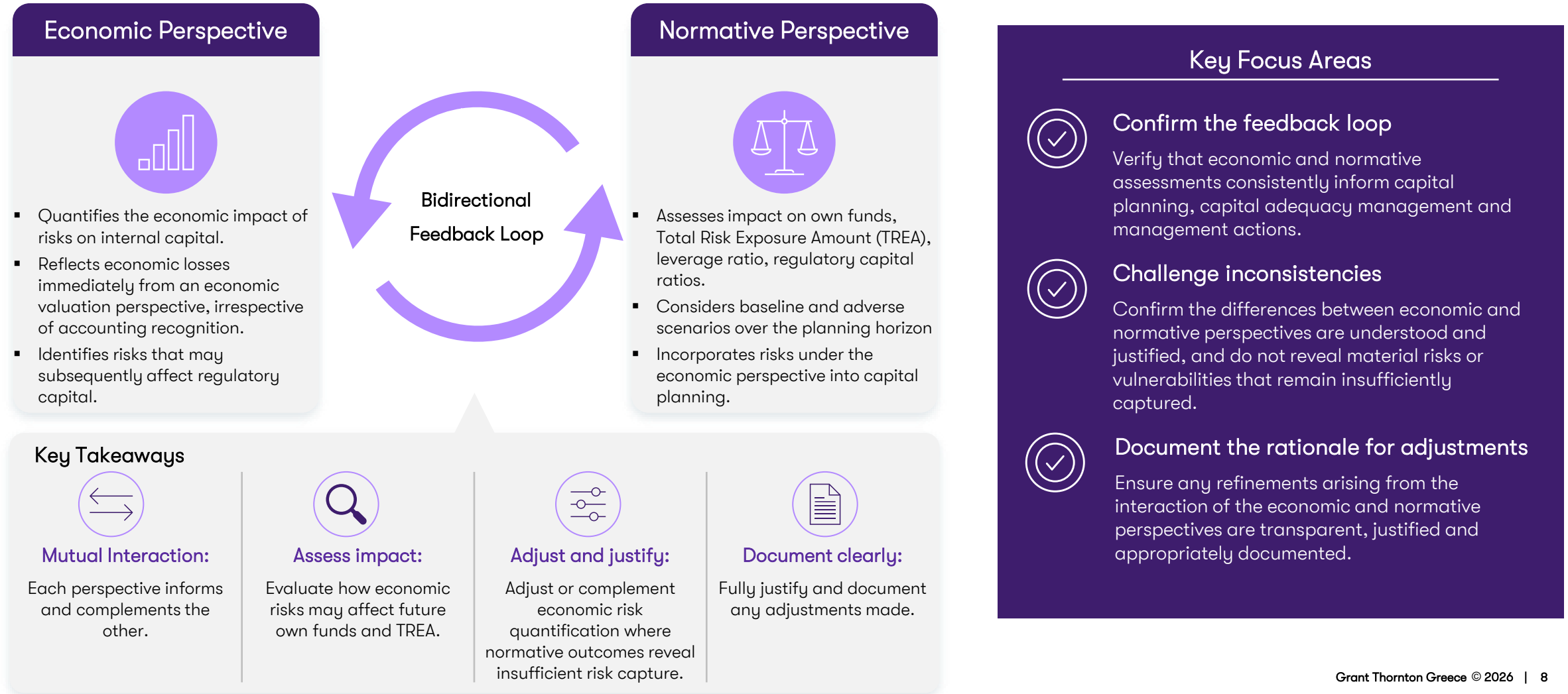
		
Governance	Capital Management	Documentation
Board approves internal buffer methodology	Buffer calibrated using internal risk assessment	ICAAP documentation clearly distinguishes management buffer from regulatory capital
Ownership rests with management	Used in planning—not as compliance threshold	
Embedded in risk governance and decision-making	Supports sustainability of business model and resilience	Consistent narrative across ICAAP, RAF and Recovery Plan

Key Focus Areas

	
Update ICAAP policy wording to reflect management buffer as an internal management concept	Ensure management buffers are linked to internal governance rather than supervisory requirements

Economic and normative perspectives must inform each other

A continuous feedback loop between the two perspectives supports coherent risk quantification, capital planning and capital adequacy management over the planning horizon.



Outsourcing does not outsource the risk

Institutions remain fully accountable for outsourced activities and must assess the associated risks as if performed in-house.

What the guide requires

- 1 **Identify, assess and quantify** the underlying risks of outsourced operations as if the institution performed them.
- 2 Take a **forward-looking** view before implementation – not a retrospective check.
- 3 Reflect the **specifics of each arrangement** in the risk assessment, including the nature of services performed externally.
- 4 Outsourcing **does not remove** the institution's obligations. **Responsibility cannot be delegated** to the provider.

Key Focus Areas



Confirm outsourcing risk assessments are completed before implementation, not added after the arrangement is live.



Ensure the **risk inventory** consistently captures material risks arising from all new and existing outsourcing arrangements.



Validate the **governance, monitoring and controls** remain effective and proportionate to the risk profile.

Why it matters



Preserves risk ownership

The institution remains fully accountable for risks arising from outsourced activities.



Strengthens resilience

Forward-looking assessments reduce blind spots and improve operational resilience.



Supports supervisory expectations

Aligns practices with ECB expectations on risk management and governance.



Outsourcing transfers the performance of an activity—not responsibility for identifying, assessing, quantifying and managing the associated risks.

Internal capital must pass continuity and economic-value tests

Internal capital must represent capital that is economically available to absorb losses under a going-concern perspective—not simply capital recognized for regulatory purposes.

Key Clarifications



Reflect the institution's economic capital concept

Internal capital must be consistent with the institution's own economic capital adequacy concept and internal risk quantifications- **not simply equal to Common Equity Tier 1 (CET1) own funds.**



Apply economic adjustments

Starting from regulatory own funds, apply adjustments for hidden losses and for capital items with loss-absorption capacity only where the institution is not expected to continue.



Assess non-continuation instruments carefully

AT1 and similar instruments generally do not meet the continuity criterion, as they absorb losses mainly in non-continuation scenarios. Under a net-present-value approach, they should therefore be treated as liabilities rather than internal capital.



Reconcile both perspectives

Maintain the ability to reconcile differences between own funds under the normative perspective and available internal capital under the economic perspective.

Key Focus Areas



Re-test each capital component against continuity and economic-value criteria

CET1 classification alone does not establish adequacy.



Confirm hidden-loss adjustments

Ensure economic adjustments are appropriately identified and applied.



Confirm non-continuation instruments are treated consistently

Assess whether AT1 meets the continuity and economic value criteria.



Reconcile and document differences

Maintain clear linkage between normative own funds and internal capital.

Risk quantification must be robust, data-driven and independently validated

Supervisory focus is increasingly placed on how institutions quantify, validate and govern risks.

1 What the guide requires

- **Tailored to the institution:** risk quantification methodologies should reflect the institution's risk appetite, market expectations, business model, risk profile, size and complexity.
- **No risk is exempt:** hard-to-quantify or data-scarce risks still require conservative figures, never exclusion.
- **Conservative and coherent:** risk quantification should capture risks adequately and conservatively; assumptions should be prudent and applied consistently.

2 Key Focus Areas

- **Data quality framework:** covering completeness, accuracy, consistency, timeliness, uniqueness, validity and traceability.
- **Be transparent on diversification:** Report gross figures before inter-risk diversification alongside net figures and apply diversification assumptions prudently.
- **Validate independently:** methodologies should undergo regular independent validation; internal audit should not perform the validation.

3 Why it matters

- **Vendor models:** must be fully understood and tailored to the institution's risk profile, not imported mechanically.
- **Validation must reach the top:** findings go to senior management and the management body, and drive methodology reviews.
- **A key supervisory input:** ICAAP outcomes feed into SREP assessments and supervisory capital decisions.



Robust capital assessment relies on institution-specific methodologies, strong data quality and credible independent validation.

Capital and liquidity stress testing should inform each other

Regular, severe-but-plausible stress testing assesses the institution's resilience under adverse conditions. Reverse stress testing complements this assessment by identifying scenarios that could threaten the viability of its business model.

What the guide requires



Assess integrated impact

Institutions are expected to assess combined impact of adverse scenarios on capital and liquidity, consider interactions between the two perspectives.



Capture key liquidity stress drivers

Reflect funding pressures, asset liquidation effects and other material liquidity impacts in stress outcomes.



Ensure mutual information flows

ICAAP and ILAAP stress tests are expected to inform each other — assumptions, results and management actions mutually taken into consideration.



Perform reverse stress testing

Identify scenarios that could challenge the viability of the business model and inform risk management actions.

Key Focus Areas



Ensure ICAAP and ILAAP stress tests are aligned

Review whether assumptions, results and management actions are consistently reflected across capital and liquidity stress testing.



Challenge key stress vulnerabilities

Verify that severe-but-plausible scenarios capture the institution's principal risk drivers and material sources of vulnerability.



Strengthen reverse stress testing

Assess whether reverse stress scenarios identify credible pathways that could threaten the viability of the business model and inform management actions.



Key Takeaway

Integrated capital and liquidity stress testing enhances risk insight, supports better decision-making and strengthens overall resilience.

03 | ECB clarification on ICAAPs and ILAAPs and respective package submissions

Governance & risk inventory expectations

The ECB reinforces expectations that ICAAP and ILAAP should operate as continuous management processes supported by strong governance arrangements and regular Board involvement. Capital and liquidity plans should remain dynamic and responsive to changing market conditions.

What the Clarification sets out



Governance

Banks must describe management body review/approval of capital, liquidity and funding plans, the functions responsible for and contributing to the planning process, and the frequency of comprehensive plan redesigns and regular updates.

Key Focus Areas

- Confirm governance documentation evidences management body review and approval and defines the frequency of plan redesigns updates.
- Ensure the risk inventory is complete and captures the underlying risk-profile assessment under both perspectives.



Developments

Swift updates are expected following material unforeseen developments (e.g. macro- financial/geopolitical developments, changes to the ECB's operational framework, the interest rate environment).

Why it matters?

The Clarification emphasizes that governance bodies should demonstrate a clear understanding of prospective capital and liquidity vulnerabilities.



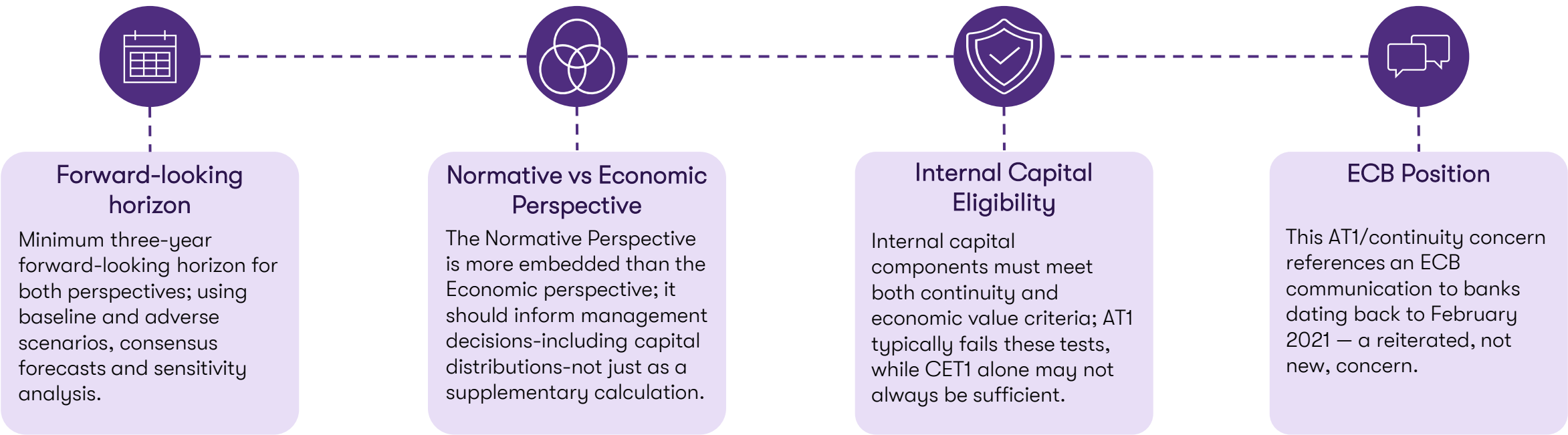
Perspectives

A complete risk inventory and the underlying assessment of their risk profile should be submitted, covering both the normative and economic perspectives.

Economic perspective embedding & internal capital eligibility (1/2)

The ECB expects the economic perspective to be effectively embedded in business, capital, and risk management , rather than operating as a parallel assessment. The Clarification reiterates the ECB’s longstanding position (February 2021) on AT1 eligibility under the continuity and economic-value criteria.

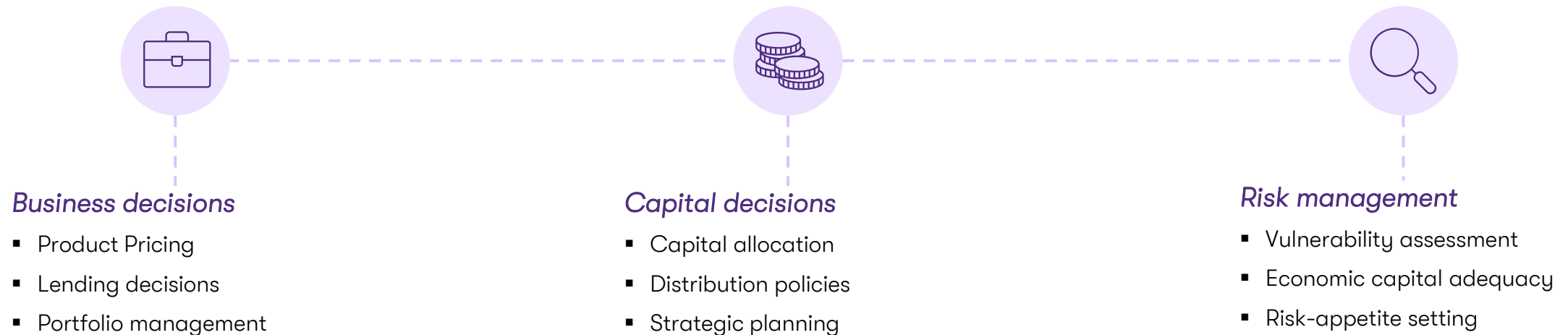
What the Clarification reiterates and clarifies



Economic perspective embedding & internal capital eligibility (2/2)

The ECB expects the economic perspective to be effectively embedded in business, capital, and risk management , rather than operating as a parallel assessment. The Clarification reiterates the ECB's longstanding position (February 2021) on AT1 eligibility under the continuity and economic-value criteria.

Where the Economic Perspective is expected to inform decisions



Key Focus Areas

Evidence that Economic Perspective outcomes are used in strategic and operational decisions, including pricing, credit decisions, capital allocation and distribution policies.

Why it matters?

The ECB expects economic-perspective outcomes to influence concrete management decisions and forward-looking capital management, not remain confined to ICAAP documentation.

Distribution policy & management actions

The Clarification reinforces expectations regarding the credibility of management actions and the prudence of distribution decisions under baseline and adverse conditions.

What the Clarification reiterates and clarifies

- Capital plans must set out credible, feasible, quantified management actions per scenario, linked to recovery plan escalation where relevant.
- Distribution policies must be management body-approved and documented in the ICAAP package.
- Distributions are expected to be expressed exclusively as a percentage of profit, not as absolute amounts — in line with EBA.
- Caution is flagged on interim dividend distributions, given the potential volatility of interim profits before year-end closing.

Key Focus Areas

01

Review ordinary distribution-policy wording and confirm that cash dividends and share buybacks are expressed as a percentage of profits.

02

Confirm management body approval is documented and engage with the joint supervisory team (JST) before publishing material changes to the distribution policy or specific distribution plans.

03

Limit the amount distributed from interim profits and delay pay-outs, as such profits may not yet be confirmed at year-end.

04

Assess and quantify each management action under relevant scenarios and align escalation procedures with available recovery-plan options.

Submission mechanics: a two-leg approach

Supervisory implication: Continuous submission gives the relevant JST more timely visibility over ICAAP/ILAAP developments and enables a more proactive supervisory assessment.

What the Clarification reiterates and clarifies

- Starting with SREP 2025, submissions follow two legs: (i) an annual submission of key documents by 15 March, and (ii) continuous submission of new or significantly revised internal documents throughout the year.
- Key documents in the annual submission include the Capital and Liquidity Adequacy Statements, the latest internal capital and funding plans, and a reader's manual confirming completeness.
- The CAS and LAS should each be concise and indicatively around 15 pages, while providing sufficient supporting evidence.
- "Significantly revised" documents exclude purely editorial changes (e.g. a department name change) — only substantive revisions trigger continuous submission.

Key Focus Areas

- Establish governance criteria for identifying documents that trigger continuous submission.
- Review CAS/LAS content and ensure management-body ownership is clearly evidenced.
- Maintain ICAAP/ILAAP documentation that is current, traceable and readily available throughout the year, supporting the more proactive supervisory assessment enabled by continuous submission.



Additional items in the annual submission package

- ICAAP: template, Pillar 1–ICAAP reconciliation document, and financial/capital projections (reference date: preceding year-end).
- ILAAP: template and European Banking Authority (EBA) funding plan — both submitted, alongside the above, by 15 March.

Practical Implications

Effective ICAAP and ILAAP frameworks require institutions to demonstrate that capital and liquidity assessments actively inform governance, strategic planning, risk management and management decision-making, supported by robust and traceable documentation.



No additional supervisory requirements

The July 2026 publications do not introduce additional ICAAP principles or regulatory requirements. They clarify supervisory expectations where inconsistent implementation has been observed.



Greater emphasis on demonstrable implementation

Institutions are expected to provide clear evidence that ICAAP and ILAAP actively support governance, strategic planning, capital allocation and day-to-day decision making, not merely regulatory reporting.



Documentation quality becomes a supervisory focus

Supervisory attention increasingly extends beyond methodologies to the consistency, traceability and governance of ICAAP documentation, internal reviews, management actions and submissions.



Priority for institutions

Institutions should reassess existing ICAAP frameworks to ensure governance, documentation and practical application are fully aligned with the clarified ECB expectations.

Related Supervisory Case Study

ECB administrative penalty | Banque Internationale à Luxembourg (BIL)



Issue

The bank intentionally failed to apply its ECB-approved internal models for calculating expected losses on defaulted retail and corporate exposures



Impact

- Capital was overstated
- Capital ratios were overstated
- Misstatement continued for three consecutive quarters (Q4 2023- Q2 2024)



Outcome

ECB administrative penalty

€3.255 million



Key message

The case illustrates that supervisory expectations extend beyond model approval to consistent implementation and accurate application. Weak execution of approved internal methodologies can have direct supervisory consequences.

How can Grant Thornton support you?

The ECB's July 2026 Clarification reinforces existing ICAAP/ILAAP expectations. Grant Thornton supports institutions in aligning governance, methodologies, documentation and submission processes with the clarified expectations and the annual and continuous submission framework.



Why Grant Thornton?

More client-facing messaging about what makes us the best choice for global banks

Grant Thornton aims to turn uncertainty into clarity for global banks. With fresh thinking, deep expertise and a global team dedicated to you, we can offer the guidance you need to thrive in complex times.



**Global banking
expertise**

We are a truly global network, with multiple international solutions, immense industry knowledge and deep understanding of global regulations. Our audit heritage means we have banking relationships around the world to deliver exceptional service.



**Agility and
flexibility**

We are known for our execution excellence and results-driven programmed management. Count on our harmonized services, agile network, reliable business model and robust back-up system.



**Innovative
thinkers**

We listen to your unique challenges and offer fresh ideas that solve them. A flexible fee structure means you get the best solution at the best value. We also convene a global banking steering committee to you always get cutting-edge insights.



**Collaborative
approach**

We are trusted by global banks for our personalized services and dedicated client teams that deliver when you need it even at short notice. The result is a pragmatic approach that helps tackle change management complexities head on.

Go beyond with Grant Thornton



100%

of FTSE 100 banking companies are clients of Grant Thornton member firms



93%

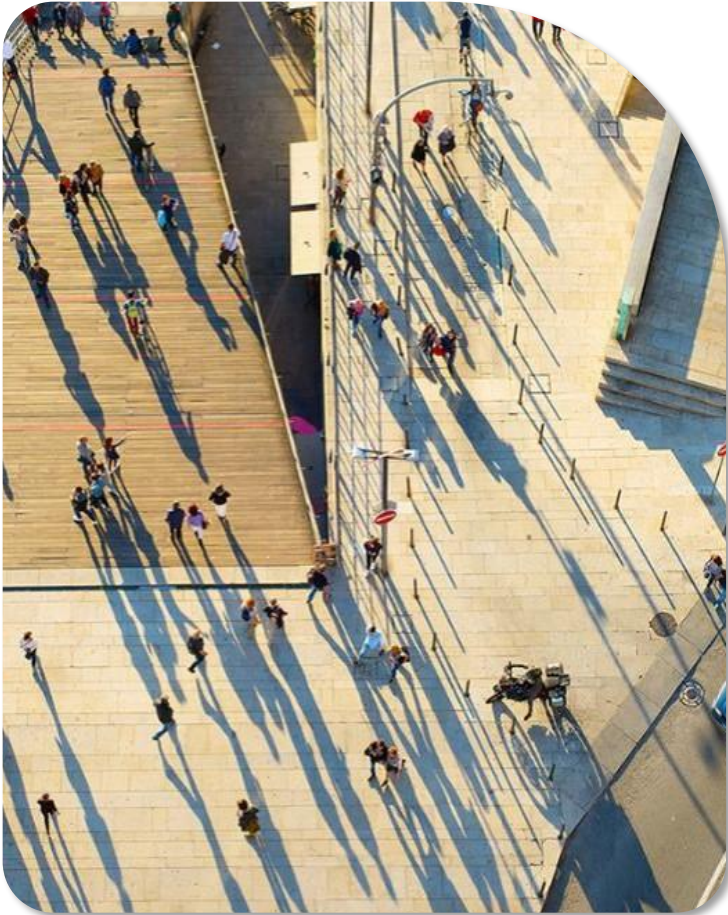
Of Forbes 100 banking companies are clients of Grant Thornton member firms

The world's leading companies choose Grant Thornton to help realise their ambitions.

With **76,000 people** in **150 markets**, our network combines global scale and capability with local insights and understanding. That means we can help you prosper across borders with our unique combination of expertise and collaboration.

Financial Services Department

Financial services organizations operate under an intensively dynamic and heavily regulated environment where changes and challenges are constants.



Grant Thornton is committed to providing clients with value-added, forward-looking advice. To enhance this approach, we have established a dedicated **Financial Services Department** that integrates expertise from our **Assurance, Advisory, and Tax Business Lines**. This department is composed of experienced professionals specializing in services for dynamic organizations in the financial sector. Through a comprehensive range of integrated solutions, we identify client needs and adopt a collaborative approach to deliver flexible, effective solutions that can be implemented immediately.

We do not stop designing new services and enhancing existing ones adapting to the challenging environment. Our key industry specific solutions can be summarized in the following groups of services:

- Financial Advisory
- Portfolio Services
- Risk Services
- Operational Advisory
- Internal Audit & Compliance
- Audit & Assurance
- Tax & Outsourcing Services
- Environmental, Social and Governance (ESG)

Grant Thornton: Genuine response to your challenges

Executing complex and technical advanced projects in the constantly evolving environment includes many challenges as well as opportunities. Our team of experts will provide you with a tailored, flexible solution and the expertise you require at competitive rates. We summarise below how we can meet your criteria and key areas of focus:

Our Experience and Capabilities



- **Industry knowledge** which leads to deep understanding of the risks and opportunities associated with the project. We understand the banking market and the challenges faced by the entities in this sector. We will bring this learning to **help benchmark your procedures against good industry practice and the expectations of all stakeholders** (shareholders, customers, staff, agents and society).
- We have significant experience of working with all major financial institutions, including undertaking and overseeing a wide range of regulatory, risk and governance reviews.
- **Pool of more 300 dedicated executives in the Financial Services** with unique set of skills, experienced in handling complex projects and delivering high-quality results and **a team of 150+ experts**, with extensive experience spanning a diverse range of **technology domains**.

Our People



- **Unparalleled experience** of our **Leadership team**.
- **Our people are open, flexible and easy to work with**. We work through the issues together, not alongside you.
- **Our collaborative style enables** us to assemble teams with a broader perspective – working across service lines and diverse industry teams to tailor our capabilities for you.
- Our team will provide guidance at each step of the project, notifying the risks and ways to overcome them.
- Our **global network** of International Business Centers (IBCs) and country desks are in place to coordinate international work and to effectively provide inside and any possible help that your project requires.

Proven track record



- **We have an extensive track record** of supporting financial institutions in advisory services.
- Specifically, we have successfully completed many similar projects across a range of financial institutions of important size and complexity.
- Unique combination of **Senior Banking Experts** along with advisors & **Technology experts**.

Our approach



- **Hands on approach, by our dedicated teams**, to ensure proper and timely execution of the agreed time-plan.
- **We invest the time to truly understand your business**, giving real insight and a fresh perspective to keep your moving. We are agile with shorter decision-making chains and empowered teams; so, you get the outcomes you need when speed matters.
- **Put simply, our teams add value**. We like to bring ideas to the table, going beyond the technical issues to recommend ways to make your business better.
- **Focus on pragmatic solutions** to help you improve and bypass any obstacles.
- **We joint forces** to provide the best possible services to our clients. **Collaboration is a key element of our value chain**.



We are committed to provide the highest standard of services at a competitive fee with a view to establish a long-term relationship and help the bank to navigate through the challenging environment.

Contact

Our specialists support institutions in responding to evolving ECB expectations across ICAAP and ILAAP frameworks, from governance reviews and risk inventory assessments to forward-looking capital planning, management actions and Economic Perspective integration. We help banks translate supervisory expectations into practical, well-governed and decision-oriented capital and liquidity management processes.

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