



What regulators actually expect from the DORA ICT Register

14 real questions financial institutions asked regulators, and what the answers mean for your ICT Register



EU-based infrastructure



How to use this guide?

- Each slide covers one **real DORA ICT RoI question**
- We summarize the regulator position in plain language
- We add one practical implication for compliance teams

1. Do Visa and Mastercard belong in the ICT Register?

Often yes. Visa and Mastercard can qualify as ICT service providers when the service they deliver meets the DORA definition of an ICT service. Not all services they provide are automatically in scope.

Regulator answer

- Do not exclude Visa or Mastercard just because they are known as payment infrastructure providers
- Assess the specific service, not just the provider name
- If the service has a clear ICT component, it likely belongs in the register

Practical implication

Excluding payment providers entirely because they are seen as financial infrastructure, not ICT services.

Common mistake

2. If a provider is supervised at EU level, should it still be included in the ICT Register?

Yes. Even if an ICT provider is supervised at EU level as a critical ICT provider, financial institutions must still include it in their ICT Register and manage the relationship under DORA third-party risk requirements.

Regulator answer

- Critical designation does not reduce your DORA responsibilities
- EU supervision does not remove reporting obligations
- Contracts and risk management obligations still apply

Practical implication

Assuming EU supervision of a critical provider replaces your own DORA third-party risk obligations.

Common mistake

3. Do one-time ICT purchases need to be included in the DORA ICT Register?

Not always. The ICT Register should include ongoing ICT services. A one-time hardware or software purchase may fall outside scope unless it includes continuous ICT support or updates.

Regulator answer

- Focus on ongoing ICT service relationships
- Pure one-time purchases may fall outside scope

Practical implication

Including every IT-related purchase or invoice instead of identifying actual ICT services.

Common mistake

4. Should public authorities be included as ICT providers in the DORA ICT Register?

No. Public authorities are generally not considered ICT third-party service providers under DORA and should not be included in the ICT Register.

Regulator answer

- The register should focus on commercial ICT providers
- Government institutions are typically out of scope

Practical implication

Adding regulators or public authorities as ICT providers in the register.

Common mistake

5. If we buy Microsoft or Azure through a reseller, who should appear in the register?

It depends on the reseller's role. If the reseller only sells the service once, it may not need to be recorded. If it actively delivers or supports the service, the subcontracting chain should be shown.

Regulator answer

- Map the actual service delivery chain
- The reseller may appear as provider, the cloud provider as subcontractor

Practical implication

Recording only the reseller or only the cloud provider, instead of the full delivery chain.

Common mistake

6. When does the subcontracting chain need to be shown in the ICT Register?

If ICT services supporting critical or important functions rely on subcontractors, the relationship should be reflected and the associated risks periodically assessed.

Regulator answer

- Subcontractors involved in delivering critical services should be visible in the register
- Risks related to those subcontractors must be regularly reassessed

Practical implication

Treating the ICT Register as a simple vendor list instead of mapping service dependencies.

Common mistake

7. Who is responsible for assessing subcontractor risk?

Financial institutions must periodically assess risks related to subcontracted ICT services that support critical or important functions. This includes ICT threats, concentration risk, and geopolitical risk.

Regulator answer

- The financial institution remains responsible for subcontractor risk
- Do not rely solely on the provider's own risk assessments
- Reassess subcontractor risk regularly, especially for critical services

Practical implication

Assuming the primary ICT provider manages subcontractor risk alone

Common mistake

8. What if the ICT provider has no LEI or EU-ID?

For ICT providers outside the EU, the regulator expects the use of a Legal Entity Identifier (LEI) for identification in the ICT Register. Entities established in the EU should have an EU-ID.

Regulator answer

- Validate vendor identifiers early when preparing the register
- Non-EU ICT providers should typically be identified using LEI
- Missing identifiers can delay or complicate reporting

Practical implication

Trying to report providers without verifying standard entity identifiers first.

Common mistake

9. What if the ICT provider's LEI has expired?

If an LEI has expired, the ICT service provider should renew the LEI or obtain a new one. If the entity is established in the EU, an EU-ID can also be used for identification.

Regulator answer

- Vendor identifiers must be kept up to date
- Expired LEIs can create validation issues during reporting
- Vendor data maintenance becomes part of RoI governance

Practical implication

Assuming vendor identifiers remain valid without periodic verification.

Common mistake

10. What if the ICT provider has no LEI?

For ICT providers outside the EU, the register should use a Legal Entity Identifier (LEI) for identification. EU-established entities should have an EU-ID.

Regulator answer

- Vendor identifiers must be verified before reporting
- Non-EU ICT providers should normally be identified using LEI

Practical implication

Vendor identifiers must be verified before reporting Non-EU ICT providers should normally be identified using LEI.

Common mistake

11. Is the ICT Register a full-year record or a point-in-time snapshot?

The ICT Register represents a snapshot at the reporting date. For the first reporting cycle, institutions must report ICT contracts that are active on 31 December 2025.

Regulator answer

- The register reflects ICT dependencies at the reporting date
- Only active contracts should appear in the register
- Do not treat the register as a full historical contract list

Practical implication

Trying to report all ICT contracts from the year, instead of focusing on those active on the reporting date.

Common mistake

12. Do institutions with a license but no activity need to submit the register?

No. If the institution did not conduct activity during the reporting period, the ICT Register does not need to be submitted.

Regulator answer

- The obligation applies to active institutions
- No activity means no ICT contracts to report

Practical implication

Preparing a register even when no reportable ICT services exist.

Common mistake

13. What does “solo reporting” mean for DORA ICT Registers?

For the first reporting cycle, the regulator collects ICT Registers at the individual entity (solo) level. Each financial institution must submit its own register. One group entity may submit the report on behalf of another, but the data must remain separate for each licensed entity.

Regulator answer

- ICT Registers are not submitted as one group-wide register
- Each regulated entity must maintain its own register
- Group reporting may be centralized, but data must stay entity-specific

Practical implication

Building a single group vendor list and assuming it satisfies entity-level reporting.

Common mistake

14. Can one entity submit the register for another group entity?

Yes. One entity may submit the register on behalf of another, but the data must still be reported separately for each regulated entity.

Regulator answer

- Reporting may be operationally centralized but registers must remain entity-specific

Practical implication

Submitting one consolidated group register instead of entity-level data.

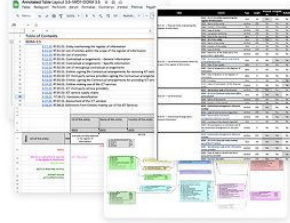
Common mistake

What these clarifications reveal about DORA ICT Registers

- 1. Scope is broader than many teams expect**
Payment providers, cloud services, and some infrastructure services may fall within the ICT service definition.
- 2. Supply chains must be visible**
Resellers and subcontractors can appear in the register when they participate in service delivery.
- 3. Vendor data quality matters**
Identifiers such as LEI and EU-ID must be accurate and up to date to avoid reporting issues.
- 4. The register is a snapshot**
Only ICT service contracts active at the reporting date must be included.
- 5. Registers are entity-level**
Even within groups, each regulated entity must maintain its own ICT Register.

Copla Registry

A controlled system for regulatory registers under DORA



Without Copla Registry

- ✗ Manual registers and coded templates
- ✗ Duplicated data across multiple spreadsheets
- ✗ Errors discovered late

DocuSign Inc. Ready to export	DORA ICT Ref		
Atlassian Corporation Plc Ready to export	DORA ICT Ref		
Microsoft Corp. Draft	DORA ICT Ref		
Simbarweb UK Ltd Draft	DORA ICT Ref		

With Copla Registry

- ✓ Structured inputs with enforced EBA logic
- ✓ Single data entry, reused consistently
- ✓ Automatic validation
- ✓ Export-ready xBLR-CSV files

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Fewer late corrections

Easier review

Lower reporting risk

Copla Registry supports regulator-facing reporting, aligns with local supervisory expectations, and maintains full auditability and traceability.