SmartSuite

Framework / Financial Services Regulation / Other

EBA Guidelines on Outsourcing Arrangements (EBA/GL/2019/02), Being Replaced by EBA/GL/2026/09

The EBA Guidelines on outsourcing arrangements (EBA/GL/2019/02) set the EU framework for outsourcing governance, registers, contracts, and exit plans, now being replaced by EBA/GL/2026/09.

What it is

The EBA Guidelines on outsourcing arrangements (EBA/GL/2019/02) are the European Banking Authority's harmonized framework for how financial institutions govern, assess, contract, monitor, and exit outsourcing arrangements. They set criteria for deciding whether an outsourced function is critical or important, require a register of all outsourcing arrangements, and specify the pre-outsourcing analysis, due diligence, contractual terms, sub-outsourcing conditions, access and audit rights, and exit strategies institutions must have in place.

The EBA published the guidelines on 25 February 2019; they applied from 30 September 2019 to credit institutions and investment firms subject to the Capital Requirements Directive and to payment and electronic money institutions, replacing the 2006 CEBS guidelines on outsourcing and the EBA's 2017 recommendations on outsourcing to cloud service providers. On 18 September 2026 the EBA published its final Guidelines on the sound management of third-party risk related to non-ICT services (EBA/GL/2026/09), which, once applicable, will repeal the 2019 guidelines; the new guidelines are awaiting translation into the EU official languages, are not yet applicable, and provide a two-year transitional period for reviewing and documenting existing arrangements that support critical or important functions.

At a glance

PUBLISHER European Banking Authority (EBA)	TYPE Guidance	VERSION EBA/GL/2019/02; EBA/GL/2026/09 (final report, Sep 2026)
EFFECTIVE Sep 30, 2019 (GL/2019/02); GL/2026/09 date to be set	DOMAIN Financial Services Regulation	FAMILY Other
REGION European Union	INDUSTRY Financial Services	ADOPTION MODEL Regulatory Compliance
IMPLEMENTATION COMPLEXITY High		

Source: https://www.eba.europa.eu/activities/single-rulebook/regulatory-activities/internal-governance/guidelines-third-party-risk-management

Why it matters

- **One EU-wide framework** Harmonized requirements across credit institutions, investment firms, and payment and e-money institutions replaced fragmented national and sectoral expectations.
- **Criticality drives proportionality** Arrangements supporting critical or important functions attract the full requirements, while less material arrangements receive lighter treatment.

How SmartSuite supports EBA GL/2019/02

Outsourcing Register

Hold every arrangement with its reference, provider, function, criticality assessment, data location, and sub-outsourcing chain in a register aligned with the DORA register of information.

Ownership, Cadence, and Accountability

Assign business and risk owners, schedule reviews by criticality, and route management body approvals and supervisory notifications through workflows.

Evidence Collection and Audit Trail

Attach due diligence reports, contracts, audit rights, and certifications to each arrangement with timestamps and reviewers.

Pre-Outsourcing Analysis and Monitoring

Run risk assessments and due diligence before contracting and monitor performance, incidents, and changes throughout the arrangement.

Concentration and Exit Planning

Track provider concentration across functions and entities and maintain tested exit strategies for critical or important functions.

Supervisory Reporting

Produce register extracts, critical-function summaries, and transition status for competent authorities and the management body.

Common framework mappings

EU DORA · EBA GL/2019/04 · PSD2 · BCBS Operational Resilience Principles · PRA SS1/21 · Interagency TPRM Guidance (2023) · ISO/IEC 27036 · ISO 27001:2022 · SOC 2 · NIST SP 800-161 Rev.1

Official resources

EBA Guidelines on third-party risk management page

The EBA rulebook page carrying the 2026 guidelines, their status, the final report, and the 2019 version of the outsourcing guidelines.

eba.europa.eu/activities/single-rulebook/regulatory-activities/internal-governance/guidelines-third-party-risk-management

EBA/GL/2019/02 Guidelines on outsourcing arrangements (PDF)

The consolidated text of the 2019 outsourcing guidelines as published by the EBA.

eba.europa.eu/sites/default/files/document_library//875334/EBA%20GL%202019%2002%20-%20CT%20GLs%20on%20outsourcing%20arrangements.pdf

Final report on EBA/GL/2026/09 (PDF)

The final report on the Guidelines on the sound management of third-party risk related to non-ICT services, with the guidelines text, application, transitional, and repeal provisions.

eba.europa.eu/sites/default/files/2026-09/dc9ccbb3-79b9-493d-b693-c21adeffbcc9/Final%20report%20on%20GL%20on%20third-party%20risk%20management.pdf

EBA press release of 18 September 2026

The EBA's announcement of the final third-party risk guidelines, their focus on critical or important functions, and the two-year transitional period.

eba.europa.eu/publications-and-media/press-releases/eba-publishes-its-final-guidelines-management-third-party-risk-delivering-more-proportionate-and

Frequently asked questions

What are the EBA Guidelines on outsourcing arrangements?

EBA/GL/2019/02 is the European Banking Authority's harmonized framework for governing, assessing, contracting, monitoring, and exiting outsourcing arrangements. Published on 25 February 2019 and applicable from 30 September 2019, it replaced the 2006 CEBS outsourcing guidelines and the EBA's 2017 cloud outsourcing recommendations.

Who do the 2019 guidelines apply to?

Credit institutions and investment firms subject to the Capital Requirements Directive, and payment institutions and electronic money institutions, on an individual, sub-consolidated, and consolidated basis. They are also addressed to their competent authorities.

What is EBA/GL/2026/09?

It is the EBA's final Guidelines on the sound management of third-party risk related to non-ICT services, published on 18 September 2026. Once applicable it will repeal the 2019 outsourcing guidelines, focusing the framework on third-party arrangements supporting critical or important functions and aligning it with DORA.

When do the new guidelines apply?

The final report of 18 September 2026 is awaiting translation into the EU official languages, and the application date will be set once that is complete. The guidelines apply to arrangements entered into, reviewed, or amended on or after that date, with a two-year transitional period to review and document existing arrangements supporting critical or important functions.

How do the guidelines relate to DORA?

ICT services provided by third-party providers are within the scope of the EU Digital Operational Resilience Act, so EBA/GL/2026/09 covers non-ICT services only. Its register should be consistent with the DORA register of information, and institutions may combine the two.

What must the register contain?

The 2019 guidelines require a register of all outsourcing arrangements with prescribed information, including the provider, the function, whether it is critical or important, data location, and sub-outsourcing. The 2026 guidelines require a register for non-ICT arrangements that may be combined with the DORA register.

How does SmartSuite support the EBA guidelines?

SmartSuite holds the register with criticality assessments, due diligence evidence, contractual rights, monitoring results, and exit strategies for each arrangement, and lets institutions carry the same records into the EBA/GL/2026/09 and DORA registers during the transition.

License included / downloadable: Yes Both sets of guidelines are published free of charge by the European Banking Authority, and their register and life cycle structure is included with the platform.

Full framework page and mappings: smartsuite.com/frameworks/eu-eba-guidelines-on-outsourcing-arrangements-eba-gl-2019-02

