SmartSuite

Framework / Financial Services Regulation / Other

EBA Guidelines on Outsourcing Arrangements (EBA/GL/2019/02)

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.

At a glance

PUBLISHER
European Banking Authority (EBA)

TYPE
Guidance

VERSION
EBA/GL/2019/02 (applicable); EBA/GL/2026/09 final report of 18 September 2026 (not yet applicable)

EFFECTIVE
September 30, 2019 (EBA/GL/2019/02); EBA/GL/2026/09 application date to be set after translation, with a two-year transitional period

DOMAIN
Financial Services Regulation

FAMILY
Other

REGION
European Union

INDUSTRY
Financial Services

ADOPTION MODEL
Regulatory Compliance

IMPLEMENTATION COMPLEXITY
High

Source: 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.
- **A register supervisors can rely on** The register of outsourcing arrangements (paragraph 54 lists the minimum fields, such as a reference number, dates, provider details, data location and whether the function is critical or important) gives institutions and competent authorities a single record of what is outsourced, to whom, and with what risk.
- **Contracts that secure control** Required contractual terms cover access, information and audit rights, sub-outsourcing, data location, business continuity, and termination.

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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. It was published on 25 February 2019 and has applied since 30 September 2019, replacing the 2006 CEBS guidelines and the EBA's 2017 cloud outsourcing recommendations.

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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 they will repeal the 2019 guidelines (paragraph 22) and focus the framework on arrangements supporting critical or important functions, aligned with DORA.

When do the new guidelines apply?

The final report leaves the application date open until translations are complete. The new guidelines apply to arrangements entered into, reviewed or amended on or after that date (paragraph 18). Existing arrangements supporting critical or important functions are to be reviewed and documented within two years, and others at renewal (paragraphs 20 and 21).

What must the outsourcing register contain, and how does DORA affect it?

The 2019 guidelines require a register of all outsourcing arrangements with at least the reference number, dates, a description of the function and data, provider details, countries of service and data location, and whether the function is critical or important (section 11, paragraphs 52 to 54). ICT services fall under DORA, so the 2026 guidelines cover non-ICT services and ask for a register consistent with the DORA register of information.

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

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