ESAs publish first list of "Critical ICT Third-Party Providers" under DORA

On **18 November 2025**, the three European Supervisory Authorities – **EBA, EIOPA and ESMA** – published the **first official list of "Critical ICT Third-Party Providers" (CTPPs)** under the **Digital Operational Resilience Act (DORA)**. https://www.eba.europa.eu/publications-and-media/press-releases/european-supervisory-authorities-designate-critical-ict-third-party-providers-under-digital?utm_source=chatgpt.com

These are **19 technology and ICT providers** whose failure could have **system-wide impact on the EU financial sector**. The list includes major cloud and tech players such as **Oracle, Amazon Web Services, Google Cloud, Microsoft, IBM, Bloomberg and the London Stock Exchange Group**, among others.

Under DORA, these designated CTPPs are now subject to **direct EU-level oversight** by the ESAs, who will (by means of specific Joint Examination Teams – JETs):

- Assess their **ICT risk management and governance** frameworks
- Scrutinise **incident management, subcontracting and resilience testing**
- Use findings to help safeguard the **operational resilience of EU financial entities**

Why this matters for CSA Swiss Community

Even though DORA is EU law, this move is highly relevant for the **Swiss cloud and security community**:

- Many Swiss-based institutions operate in the EU or rely on **the same hyperscalers and ICT providers** now classified as CTPPs.
- DORA crystallises regulatory expectations around **cloud concentration risk, shared responsibility, resilience testing and supply-chain transparency** – topics central to **CSA guidance and the CCM**.
- Swiss providers serving EU-regulated clients will increasingly be asked to **demonstrate alignment** with DORA-style controls and to map their controls to the **DORA / CTPP oversight themes**.

Next steps for our community

- **Financial institutions:**
  - Map your **critical services and cloud workloads** to any of the designated CTPPs.
  - Align your **cloud governance and third-party risk processes** with DORA concepts (Registers of Information, exit strategies, resilience testing).
- **Cloud / ICT providers in Switzerland:**
  - Use CSA frameworks (e.g. **CCM, CAIQ, AICQ STAR**) to structure your story around **DORA-relevant controls**.
  - Monitor ESAs guidance and CTPP oversight practices as a **preview of future expectations**.

CSA Switzerland will continue to follow how **DORA's CTPP oversight regime** evolves and what it means for **cloud architectures, supply chains and assurance practices** in our region.