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COVER NOTE

From:	Secretary-General of the European Commission, signed by Ms Martine DEPREZ, Director
date of receipt:	10 June 2025
To:	Ms Thérèse BLANCHET, Secretary-General of the Council of the European Union
No. Cion doc.:	C(2025) 3781 final
Subject:	CORRIGENDUM to Commission Delegated Regulation (EU) of 13 February 2025 supplementing Regulation (EU) 2022/2554 of the European Parliament and of the Council with regard to regulatory technical standards specifying the criteria used for identifying financial entities required to perform threat-led penetration testing, the requirements and standards governing the use of internal testers, the requirements in relation to the scope, testing methodology and approach for each phase of the testing, results, closure and remediation stages and the type of supervisory and other relevant cooperation needed for the implementation of TLPT and for the facilitation of mutual recognition (C(2025) 885 final)

Delegations will find attached document C(2025) 3781 final.

Encl.: C(2025) 3781 final

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Brussels, 6.6.2025
C(2025) 3781 final

CORRIGENDUM

of 6.6.2025

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(C(2025) 885 final)

In Recital 5:

for: '(5) To mirror the TIBER-EU framework, it is necessary that the testing methodology provides for the involvement of the following main participants: the financial entity, with a control team (mirroring the TIBER-EU 'white team') and a blue team (mirroring the TIBER-EU 'blue team'), and the TLPT authority, in the form of a TLPT cyber team (mirroring the TIBER-EU 'TIBER cyber teams'), a threat intelligence provider, and testers (whereby the testers mirror the TIBER-EU 'red team provider')'.

read: '(5) To mirror the TIBER-EU framework, it is necessary that the testing methodology provides for the involvement of the following main participants: the financial entity, with a control team (mirroring the TIBER-EU 'control team') and a blue team (mirroring the TIBER-EU 'blue team'), and the TLPT authority, in the form of a TLPT cyber team (mirroring the TIBER-EU 'TIBER cyber teams'), a threat intelligence provider, and testers (whereby the testers mirror the TIBER-EU 'red team provider')'.

In Recital 10:

for: '(10) As evidenced through the experience gathered in the TIBER-EU framework with respect to the 'white team', the selection of an adequate control team lead is indispensable for the safe conduct of TLPT. The control team lead should have the necessary mandate within the financial entity to guide all the aspects of the testing, without compromising its confidentiality. For the same reason, members of the control team should have a deep knowledge of the financial entity, of the control team lead's job role and strategic positioning, should have the required seniority and should have access to the management board. To reduce the risk of compromising the TLPT, the control team should be as small as possible.'

read: '(10) As evidenced through the experience gathered in the TIBER-EU framework with respect to the 'control team', the selection of an adequate control team lead is indispensable for the safe conduct of TLPT. The control team lead should have the necessary mandate within the financial entity to guide all the aspects of the testing, without compromising its confidentiality. For the same reason, members of the control team should have a deep knowledge of the financial entity, of the control team lead's job role and strategic positioning, should have the required seniority and should have access to the management board. To reduce the risk of compromising the TLPT, the control team should be as small as possible.'

In Article 2(3), first subparagraph:

for: ‘3. Where more than one financial entity belonging to the same group and sharing ICT systems, or where more than one financial entity using the same ICT intra-group service provider, meet the criteria set out in paragraph 2, the TLPT authorities of those financial entities shall, in accordance with Article 14(2), decide whether the requirement to perform TLPT on an individual basis is relevant for those financial entities.’

read: ‘3. Where more than one financial entity belonging to the same group and sharing ICT systems, or where more than one financial entity using the same ICT intra-group service provider, meet the criteria set out in paragraph 2, the TLPT authorities of those financial entities shall, in accordance with Article 16(2), decide whether the requirement to perform TLPT on an individual basis is relevant for those financial entities.’

In Article 5(1), introductory wording:

for: ‘1. During the preparation phase referred to in Article 8, the control team shall assess the risks associated with the testing of live production systems of critical or important functions of the financial entity, including potential impacts on:’

read: ‘1. During the preparation phase referred to in Article 9, the control team shall assess the risks associated with the testing of live production systems of critical or important functions of the financial entity, including potential impacts on:’

In Article 6(2):

for: ‘2. The control team of the designated financial entity referred to in Article 14(3), point (b), of this Regulation, or the financial entity designated in accordance with Article 26(4) of Regulation (EU) 2022/2554, shall assess the risks relating to the involvement in the TLPT of multiple financial entities. The control teams of the involved financial entities shall cooperate with the control team of the designated financial entity to identify potential joint risks.’

read: ‘2. The control team of the designated financial entity referred to in Article 16(3), point (b), of this Regulation, or the financial entity designated in accordance with Article 26(4) of Regulation (EU) 2022/2554, shall assess the risks relating to the involvement in the TLPT of multiple financial entities. The control teams of the involved financial entities shall cooperate with the control team of the designated financial entity to identify potential joint risks.’

In Article 7(1), point (h)(vi):

for: ‘(vi) monitoring of the blue team activities and information to the control team of any possible detections;

read: ‘(vi) monitoring of the blue team activities and informing the control team of any possible detections;

In Article 7(2):

for: ‘2. The control team shall keep record of the documentation provided by the testers and the threat intelligence providers to evidence compliance with paragraph 2, points (a) to (f).

In exceptional circumstances, financial entities may contract external testers and threat intelligence providers that do not meet one or more of the requirements set out in paragraph 2, points (a) to (f), provided that those financial entities adopt measures that are appropriate to mitigate the risks relating to the lack of compliance with such points and record those measures.'

read: '2. The control team shall keep record of the documentation provided by the testers and the threat intelligence providers to evidence compliance with paragraph 1, points (a) to (f).

In exceptional circumstances, financial entities may contract external testers and threat intelligence providers that do not meet one or more of the requirements set out in paragraph 1, points (a) to (f), provided that those financial entities adopt measures that are appropriate to mitigate the risks relating to the lack of compliance with such points and record those measures.'

In Article 8(1):

for: '1. Unless otherwise decided by the lead TLPT authority, where several financial entities, identified in accordance with Article 16(3) or (4), are involved in a pooled or joint TLPT, each financial entity shall follow each of the steps set out in Articles 9 to 15.'

read: '1. Unless otherwise decided by the lead TLPT authority, where several financial entities, identified in accordance with Article 16(2) or (4), are involved in a pooled or joint TLPT, each financial entity shall follow each of the steps set out in Articles 9 to 15.'

In Article 9(1):

for: '1. A financial entity identified pursuant to Article 26, paragraph 8, second subparagraph of Regulation (EU) 2022/2554 shall initiate a TLPT following a notification from the TLPT authority that a TLPT is to be carried out.'

read: '1. A financial entity identified pursuant to Article 26, paragraph 8, third subparagraph of Regulation (EU) 2022/2554 shall initiate a TLPT following a notification from the TLPT authority that a TLPT is to be carried out.'

In Article 9(6):

for: '6. The financial entity shall submit a scope specification document containing all information set out in Annex II to the test managers within 6 months from the receipt of the notification from the TLPT authority referred to in paragraph 2. The management body of the financial entity shall approve the scope specification document.'

read: '6. The financial entity shall submit a scope specification document containing all information set out in Annex II to the test managers within 6 months from the receipt of the notification from the TLPT authority referred to in paragraph 1. The management body of the financial entity shall approve the scope specification document.'

In Article 15(3), point (a):

for: '(a) the test initiation documents referred to in Article 9;'

read: '(a) the test initiation information referred to in Article 9;'

In Article 16(5), point (a):

for: ‘(a) the TLPT authorities of the financial entities shall agree on which financial entity shall be designated to lead the conduct of the pooled TLPT, considering the ICT services provided by the ICT third-party service provider to the financial entities and the efficiency of the test;’

read: ‘(a) the TLPT authorities of the financial entities shall agree on which financial entity shall be designated to conduct the pooled TLPT, considering the ICT services provided by the ICT third-party service provider to the financial entities and the efficiency of the test;’