

DORA RTS (whole Part)

Audit Checklist

480 audit questions across **61** sections.

HOW TO USE THIS CHECKLIST

Each question has three boxes the auditor fills in during the audit:

1. **Compliance** — the binary headline: Compliant / Non-compliant.
2. **Classification** — where the gap is, four-state grid: Documented / Implemented matrix.
3. **Finding level** — severity: Maj / Min / Obs (Major nonconformity / Minor nonconformity / Observation).

Severity is the auditor's call on the day, against the real finding — no severity is pre-suggested per question.



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Clients, financial counterparts and transactions

Q1 ARTICLE

RTS-1772 Art.1(1)

Does the entity count affected clients as all (natural or legal) clients unable to use the service during the incident or adversely impacted – including third parties explicitly covered by the entity-client contract as beneficiaries of the affected service?

SOURCE VERBATIM

1. The number of clients affected by the incident as referred to in Article 18(1), point (a), of Regulation (EU) 2022/2554, shall reflect the number of all affected clients, whether natural or legal persons, that are or were unable to make use of the service provided by the financial entity during the incident or that were adversely impacted by the incident. That number shall also include third parties explicitly covered by the contractual agreement between the financial entity and the client as beneficiaries of the affected service.

– Commission Delegated Regulation (EU) 2024/1772 Article 1(1), Original 2024-03-13 (RTS-1772)

COMPLIANCE

Compliant Non-compliant

CLASSIFICATION (FOUR-STATE)

- Documented and Implemented
 Documented Not Implemented
 Not Documented but Implemented
 Not Documented and Not Implemented

FINDING LEVEL

Maj Min Obs
 Maj = Major nonconformity · Min =
 Minor nonconformity · Obs =
 Observation

SUGGESTED EVIDENCE TO REQUEST

- Client-counting procedure for incident classification
- Contracts identifying covered third-party beneficiaries
- Past incident records showing applied count

MANAGEMENT SYSTEM REFERENCE:

FINDINGS / NOTES:

Does the entity count the number of financial counterparts affected by an incident as the number of all affected financial counterparts that have concluded a contractual arrangement with the entity?

SOURCE VERBATIM

1. The number of financial counterparts affected by the incident as referred to in Article 18(1), point (a), of Regulation (EU) 2022/2554 shall reflect the number of all affected financial counterparts that have concluded a contractual arrangement with the financial entity.

— Commission Delegated Regulation (EU) 2024/1772 Article 1(2), Original 2024-03-13 (RTS-1772)

COMPLIANCE

Compliant Non-compliant

CLASSIFICATION (FOUR-STATE)

- Documented and Implemented
 Documented Not Implemented
 Not Documented but Implemented
 Not Documented and Not Implemented

FINDING LEVEL

Maj Min Obs
Maj = Major nonconformity · Min =
Minor nonconformity · Obs =
Observation

SUGGESTED EVIDENCE TO REQUEST

- Counterparts register linked to contracts
- Counterparts-counting procedure for incident classification

MANAGEMENT SYSTEM REFERENCE:

FINDINGS / NOTES:

In assessing the relevance of clients and financial counterparts affected, does the entity take into account the extent to which the impact on a client or counterpart will affect implementation of its business objectives, as well as the potential impact of the incident on market efficiency?

SOURCE VERBATIM

1. In relation to the relevance of clients and financial counterparts affected by the incident as referred to in Article 18(1), point (a), of Regulation (EU) 2022/2554, the financial entity shall take into account the extent to which the impact on a client or a financial counterpart will affect the implementation of the business objectives of the financial entity, as well as the potential impact of the incident on market efficiency.

— Commission Delegated Regulation (EU) 2024/1772 Article 1(3), Original 2024-03-13 (RTS-1772)

COMPLIANCE

Compliant Non-compliant

CLASSIFICATION (FOUR-STATE)

- Documented and Implemented
 Documented Not Implemented
 Not Documented but Implemented
 Not Documented and Not Implemented

FINDING LEVEL

Maj Min Obs
Maj = Major nonconformity · Min =
Minor nonconformity · Obs =
Observation

SUGGESTED EVIDENCE TO REQUEST

- Relevance-assessment methodology
- Per past incident: business-objective impact + market-efficiency impact

MANAGEMENT SYSTEM REFERENCE:

FINDINGS / NOTES: