

### PRIIP Checklist for Risk Analysis & Reporting (as of July 2025)

This checklist supports risk and compliance teams in systematically reviewing the regulatory requirements of the PRIIP Regulation.

It serves as a basis for internal controls, audit preparation, and investor-focused disclosure in accordance with EU 1286/2014. The contents should be reviewed regularly for updates from the ESAs, the RTS, and national supervisory authorities, and adapted to company-specific processes.

#### 1. Product Review

Is the product considered a packaged retail investment product under the PRIIP Regulation?

Are there exemptions under Art. 2(2) PRIIP Regulation (e.g. occupational pensions)?

Is distribution to retail investors in the EU planned or possible?

Is the KID provided to investors before contract conclusion?

Is the KID available in the investor's language and written clearly?

Is the current version of the KID available?

#### 2. Responsibilities

Has the PRIIP manufacturer been clearly identified (e.g. asset manager, insurer) in accordance with Art. 4 PRIIP Regulation?

Has it been clarified whether the bank acts as PRIIP manufacturer or as a distributor?

Is there documented role allocation for drafting, reviewing, publishing, and archiving the KID?

Is a responsibility delegation or deputy assignment defined for staff absences?

#### 3. KID Content

Is the product description and investment objective clear and easy to understand?

Is the Summary Risk Indicator (SRI) accurately calculated and up to date?

Are performance and stress scenarios calculated in line with Delegated Regulation (EU) 2021/2268?

Is the cost overview complete, including both implicit and explicit costs?

Are redemption terms and termination rights clearly described?

Are ESG details included if the product is classified under Art. 8 or 9 of SFDR?

Is information on complaint procedures provided?



Starting from 01/01/2025, the Arrival Price method for transaction costs will be MANDATORY for all PRIIP KIDs.

#### 4. Calculation Logic & Data Sources

Are all calculations based on consistent, documented time series?

Are all input data traceable and transparent?

Is the reproducibility of simulations ensured?

Is the new calculation method under Delegated Regulation (EU) 2021/2268 applied?

Are simulation-based approaches used for complex products?

Is the minimum return on investment calculated?

Are historical data correctly applied (if available)?

Is market risk measured appropriately?

Is credit risk considered?

Is liquidity risk included?

Is the SRI classification validated for plausibility?

Is volatility measured according to Annex II of the RTS?

Is an ex-ante cost estimate prepared?

Are all cost types fully captured?

Are transaction costs included using the Arrival Price Method as per EPT 2.0 / MiFID II?

Are production costs (e.g. structuring) considered?

Are opportunity costs (e.g. foregone returns) clearly documented?

Is the timing of costs accurately reported?

**PRIIP KIDs created using UnRisk:**

[Oberbank](#) [Schoellerbank Vorsorgefonds](#)

## 5. Governance & Controls

Is the risk methodology reviewed after any changes?  
Are there documented escalation procedures for calculation errors?  
Is there an audit trail for calculation parameters and data changes?  
Are technical checks in place to prevent outdated KIDs from being used in distribution?  
Is the ESG methodology (including SFDR classification) documented?  
Are procedures established for translations and cross-border distribution?  
Are external data sources regularly reviewed and updated?  
Is version control of KIDs (V1, V2, ...) clearly managed?

## 6. Complaint Handling

Does it contain references to customer complaints?  
Are internal processes for handling complaints documented?

## 7. Review Processes & Archiving

Are internal approval processes (Compliance, Legal, Risk) established?  
Archiving obligation in accordance with Art. 10 PRIIP Regulation fulfilled (at least 5 years)?  
Have trigger events (such as product modifications or market movements) been clearly defined and documented?  
Is there an automated reminder system in place for KID updates?  
Traceable documentation of changes and adjustments?

## 8. Technical Implementation

Is automated KID generation available for high volumes?  
Is Excel integration or API in use?  
Are export functions with complete documentation available for audits?

## 9. Data Delivery & Partner Coordination

Are EPT/CEPT templates correctly and promptly shared with insurers or distributors?  
Are data formats and content market-compliant (e.g. EPT 2.0 EU, 2.1 UK)?  
Are responsibilities, liability, and data use contractually defined with partners?

## 10. Versioning & Change Tracking

Is the SRI change history traceable?  
Are versioning and access rights clearly defined (KID V1, V2, ...)?  
Are audit trails and change logs (model parameters, input data) available?

### Legal Basis

- Regulation (EU) No 1286/2014 (PRIIP Base Regulation)
- Commission Delegated Regulation (EU) 2017/653 (Technical standards)
- Commission Delegated Regulation (EU) 2021/2268 (Amendments since 2023)
- Regulation (EU) 2023/2859 (ESAP)
- Upcoming Developments: EU Retail Investment Strategy (Trilogue ongoing)

## Schedule a Meeting

We'll show you how to generate PRIIP KIDs – simple, transparent, and scalable!

### Key Dates and Deadlines

- **Immediately:** All new PRIIPs require an up-to-date KID
- **Annually:** Review of existing KIDs
- **In case of changes:** Immediate KID update required
- **01/01/2025:** Arrival Price method MANDATORY for all PRIIP KIDs
- **2025/2026:** Adoption of the EU Retail Investment Strategy expected
- **2028:** Mandatory digital submission (ESAP Regulation)