

Raising the bar on non-financial regulatory reporting (NFRR)

June 2025

NFRR overview and landscape

What is NFRR?

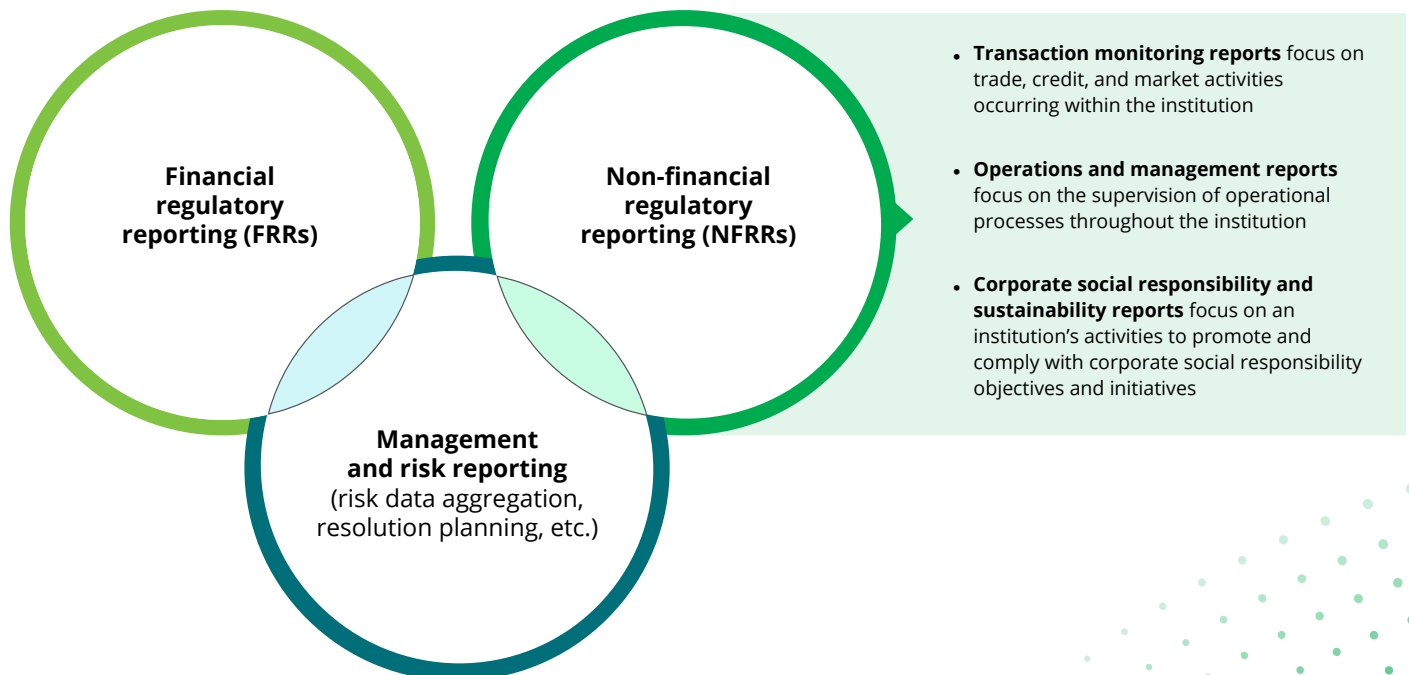
Non-financial regulatory reports (NFRRs) are mandated by laws, rules, and regulations and include data centered on complex transactional, operational, and corporate governance activities and disclosures not covered through typical income statements, balance sheets, and supplemental schedules. NFRRs are typically owned by lines of businesses (LOBs) outside of the finance group.

Depending on the scale, complexity, and product offering scope, financial institutions may have thousands of applicable NFRR obligations scattered across different LOBs, regions, and functions.

NFRR reporting landscape




Financial institutions rely upon regulatory and management reports to meet regulatory obligations, manage risks, and effectively run their business. NFRRs are foundational tools for financial institutions and regulators to track market activity, determine fairness and market transparency, monitor and investigate financial crimes, and reduce risks to financial instability.

Regulatory and Management Reporting Landscape



NFRR demographics and footprint

NFRR is particularly challenging for financial institutions as it spans multiple LOBs and control functions. NFRR represents diverse and complex reporting topics, and covers expansive regulatory jurisdictions/regions and regulatory authorities (including local, state, national regulatory agencies, and self-regulatory agencies).

Regions	Example NFRR regulators	Example languages and frequencies
 Americas (AMRS)	<ul style="list-style-type: none">Office of the Comptroller of the Currency (OCC)Federal Reserve Bank (FRB)Financial Industry Regulatory Authority (FINRA)Securities and Exchange Commission (SEC)Commodity Futures Trading Commission (CFTC)Federal Deposit Insurance Corporation (FDIC)	<p>LANGUAGES</p> <p>English, Chinese, Korean, Spanish, Japanese, etc.</p> <p>FILING FREQUENCIES</p> <p>Real time, Daily, Weekly, Monthly, Quarterly, Semi-annual, Annual, Event-driven</p>
 Europe, Middle East, and Africa (EMEA)	<ul style="list-style-type: none">Financial Conduct Authority (FCA)European Securities and Markets Authority (ESMA)Federal Financial Supervisory Authority (BaFin)Prudential Regulation Authority (PRA)	
 Asia-Pacific (APAC)	<ul style="list-style-type: none">People's Bank of China (PBOC)Reserve Bank of India (RBI)Australian Transaction Reports and Analysis Centre (AUSTRAC)Financial Services Agency of Japan (JFSA)Financial Supervisory Services (FSS)	

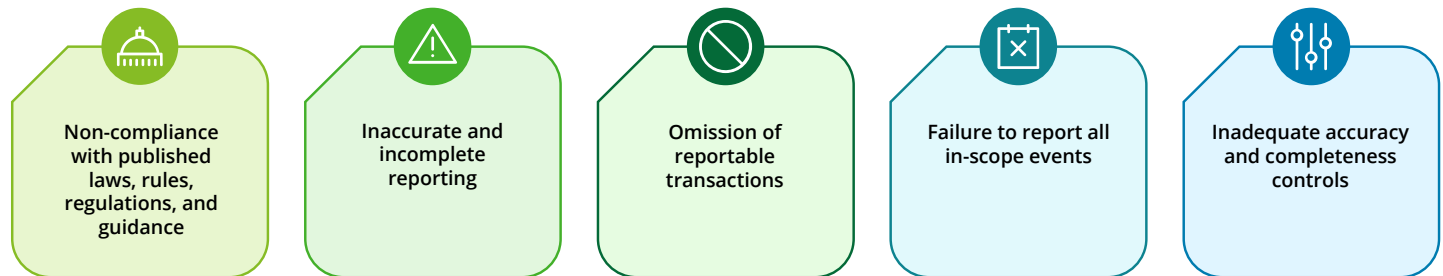
NFRR in the headlines

How are regulators raising the bar on NFRR compliance through increased scrutiny?

Regulator observations

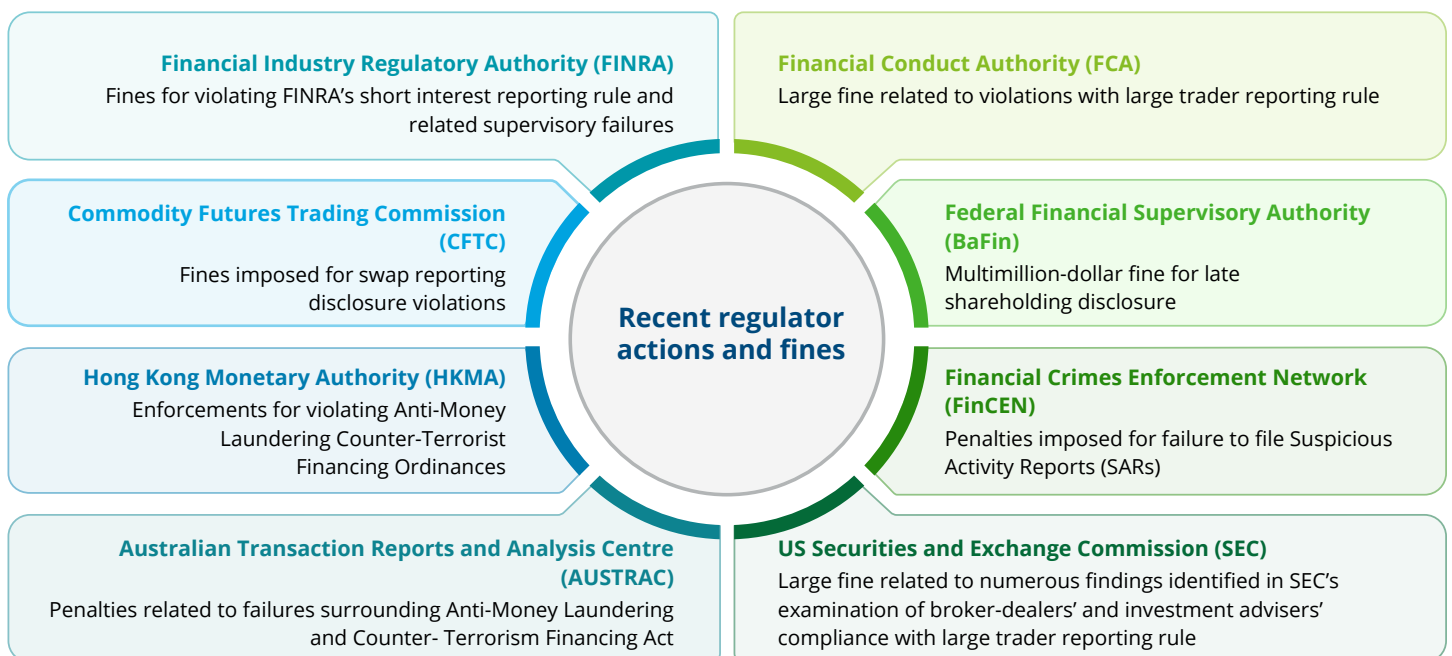
While many financial institutions have historically prioritized investments in FRRs, regulators continue to expand the scope, depth, and breadth of their oversight and examinations around NFRR. Lack of oversight, ineffective controls, and failure to comply with reporting requirements can have dire consequences for financial institutions in terms of monetary fines, consent orders, and supervisory concerns expressed through matters requiring immediate attention (MRA/MRIA), as well as reputational risk.

Recurring themes and regulatory observations:



Regulatory action and fines

Recently, there has been an increase in levels of scrutiny from regulators not only on the regulatory submissions, but also on the end-to-end report production process, controls, and governance. In addition to fines, reporting issues identified by regulators may result in negative media attention and/or lack of customer confidence. Examples of recent regulator actions include:



NFRR challenges

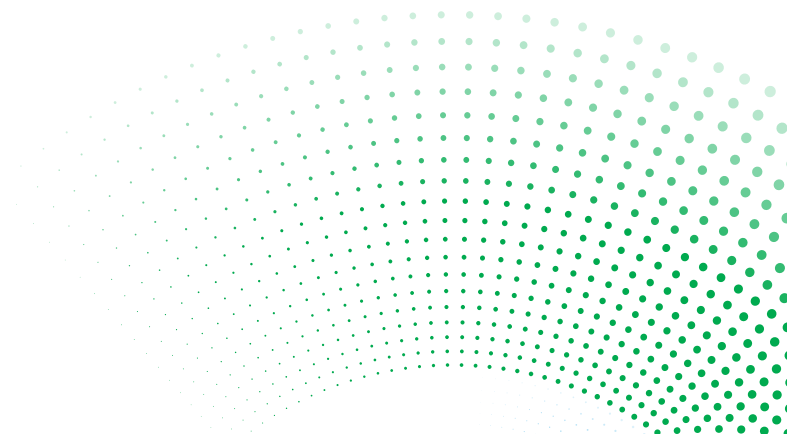
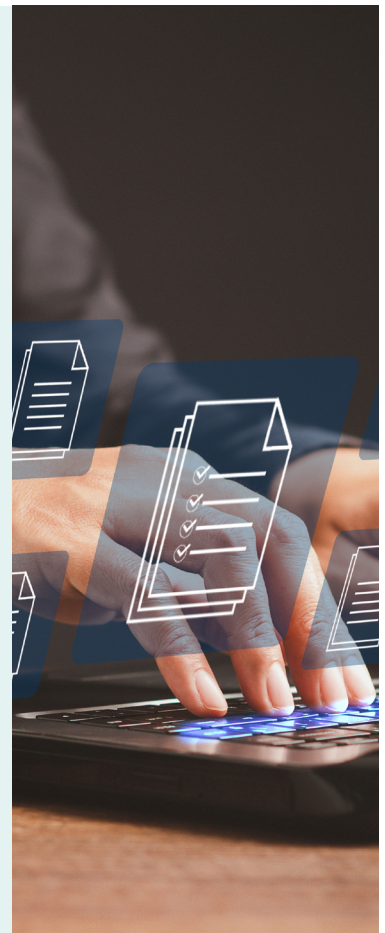
What are common challenges and issues with NFRR?

Thematic issues and challenges with NFRR

In recent years, regulators and internal second- and third-line reviews have exposed recurring themes and challenges with establishing an effective NFRR controls environment.

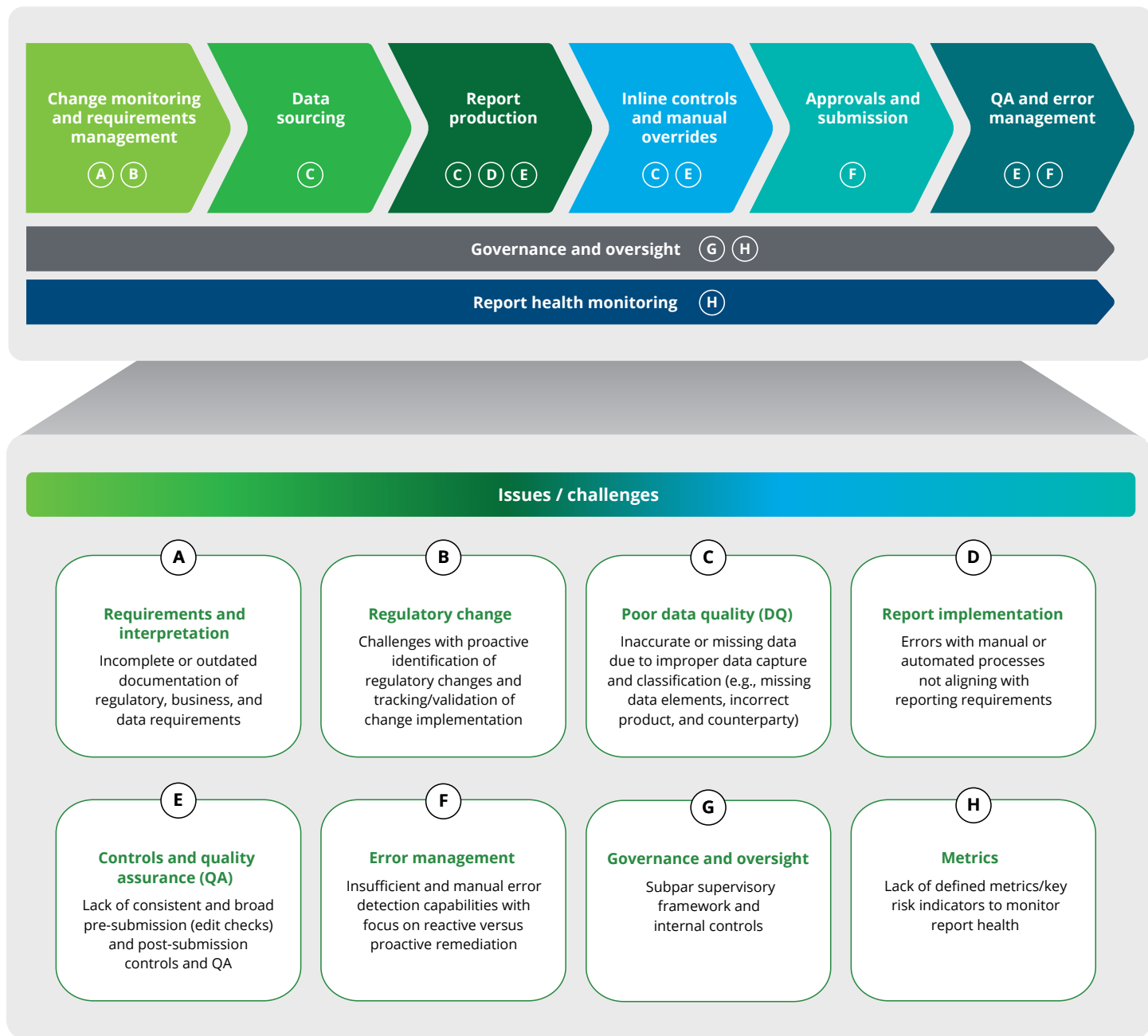
Common themes include:

- Lack of effective NFRR enterprise governance, oversight, and risk appetite.
- Inaccurate and incomplete inventory of NFRR obligations.
- Policies and standards fall short in establishing clear NFRR ownership and accountabilities, outlining baseline minimum controls, and improving consistency of execution across the enterprise.
- Regulatory change monitoring and management approach is not holistic and does not adequately account for effective monitoring of supplemental regulatory guidance (e.g., FAQs).
- Regulatory requirement traceability is not documented and/or maintained.
- Reliance on manual data sourcing, report preparation, and overrides affect accuracy and completeness of reports.
- Siloed execution of reporting processes leads to redundant, inconsistent, and ineffective regulatory reporting operations and controls.
- Issue management programs are not effective in proactive identification, thematic analysis, and timely remediation of issues.
- Pace of execution of strategic regulatory reporting transformation programs is slow and inadequate.



NFRR challenges along the report life cycle

The NFRR life cycle can be broken down into a set of standard pre-production, production, and post-production stages. When designing an effective NFRR control framework, it is important for institutions to consider all aspects of the life cycle as issues can manifest at each stage:



NFRR framework

What are the components and benefits of establishing an NFRR program?

To help identify potential gaps and opportunities, financial institutions should consider the following "guiding questions". Weaknesses in these areas suggest opportunities to strengthen the control environment to meet expanding regulatory expectations:



NFRR framework components

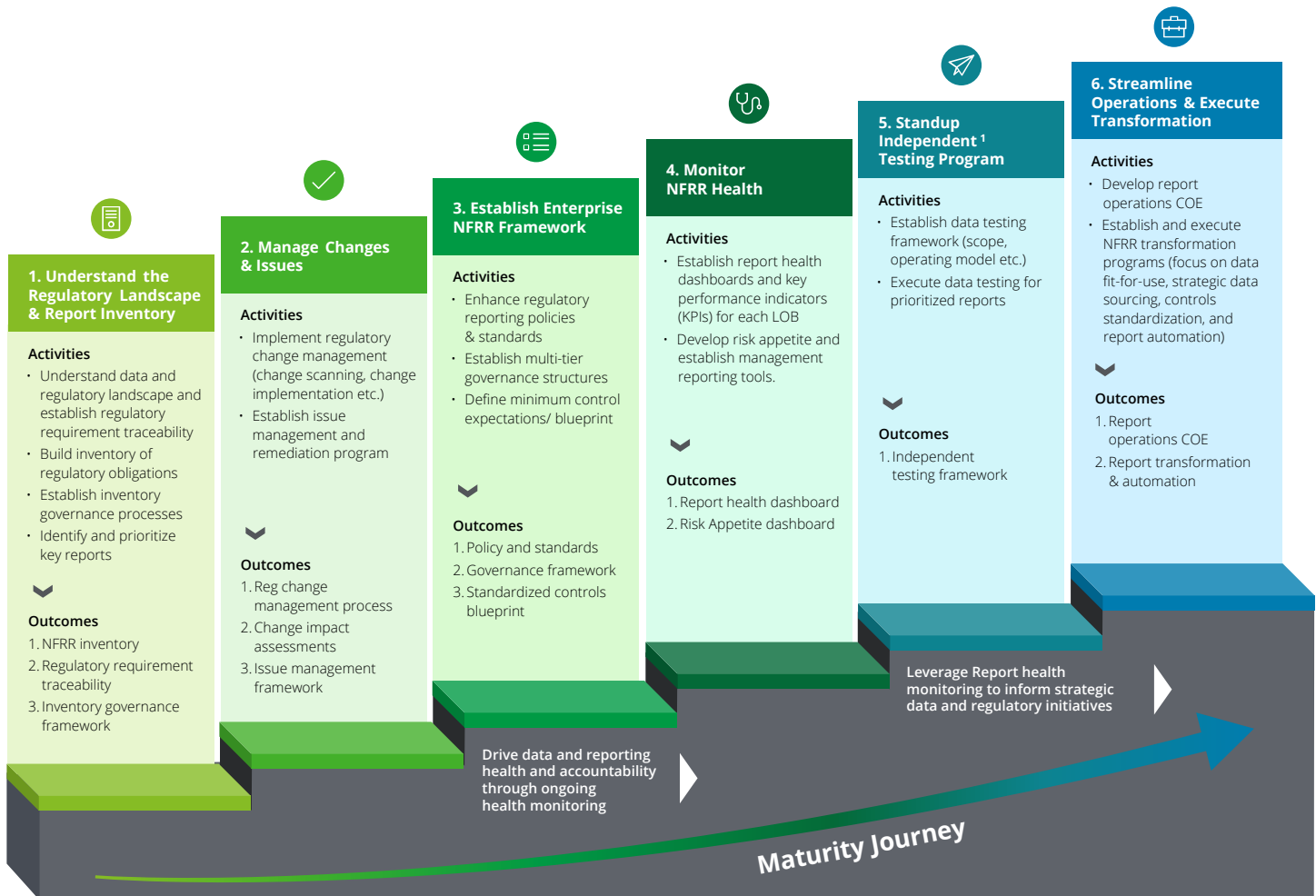
To answer these "guiding questions", institutions should design a NFRR Program that considers the following components:



NFRR maturity journey

Where is your organization on its NFRR journey?

While each financial institution's journey is different, the typical journey can be broken down into six stages



¹"Independent" refers to activities performed by a party who is not part of the organization and was not involved in the preparation of the materials being assessed.

What's next?

Assess where your organization is in its NFRR journey.

- Confirm understanding of your regulatory obligations by creating and/or refining report inventory and documenting associated data dependencies
- Review policies and standards to validate clear ownership, effective governance, and consistent control expectations
- Establish and/or redefine risk appetite and enhance report health monitoring (enterprise and LOBs) to gauge effectiveness of controls environment
- Drive operational excellence by establishing report operations COE and NFRR transformation programs

Contact us

Regardless of where your organization is on its NFRR journey, we have a suite of accelerators, technology enablers, and industry experiences that can be leveraged to accelerate your NFRR program—from developing an inventory of reporting obligations to establishing an effective governance framework with supporting KPIs.

With flexible and tailored program models, we are duly positioned to assist with the emerging needs on your maturity journey.



Dinesh Patel

Managing Director
Deloitte & Touche LLP
+1 609 806 7111
dineshpatel@deloitte.com



George Black

Principal
Deloitte & Touche LLP
+1 917 984 2710
geblack@deloitte.com



Satish Iyengar

Managing Director
Deloitte & Touche LLP
+1 215 789 6868
siyengar@deloitte.com



Cory Liepold

Principal
Deloitte & Touche LLP
+1 612 397 4168
cliepold@deloitte.com

Contributors

Supriya Shrivastava, Specialist Master | Deloitte Risk & Financial Advisory, Deloitte & Touche LLP

Ryan Hughes, Manager | Deloitte Risk & Financial Advisory, Deloitte & Touche LLP



About Deloitte.

As used in this document, "Deloitte" means Deloitte & Touche LLP, a subsidiary of Deloitte LLP. Please see www.deloitte.com/us/about for a detailed description of our legal structure. Certain services may not be available to attest clients under the rules and regulations of public accounting.

This document contains general information only and Deloitte is not, by means of this document, rendering accounting, business, financial, investment, legal, tax, or other professional advice or services. This document is not a substitute for such professional advice or services, nor should it be used as a basis for any decision or action that may affect your business. Before making any decision or taking any action that may affect your business, you should consult a qualified professional adviser.

Deloitte shall not be responsible for any loss sustained by any person who relies on this document.

Copyright © 2025 Deloitte Development LLC. All rights reserved.