



HELLENIC REPUBLIC
Hellenic Capital Market Commission

TIBER-GR NATIONAL IMPLEMENTATION DOCUMENT

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1 Introduction

TIBER-EU (Threat Intelligence-Based Ethical Red Teaming Europe) was developed by the European System of Central Banks (ESCB) and constitutes the European framework for conducting Threat-Led Penetration Testing (TLPT). The framework focuses on the realistic simulation of cyber-attacks on the critical production systems and functions of Financial Entities (FEs), with the objective of continuously enhancing digital operational resilience across the financial sector.

Following the initial publication of the TIBER-EU framework in 2018, the European Central Bank (ECB) established the TIBER-EU Knowledge Centre (TKC) to oversee and support the consistent implementation of the TIBER-EU framework at a European level. The TIBER-EU framework was updated in February 2025 to ensure that tests conducted under its methodology comply with the requirements of Regulation (EU) 2022/2554 on digital operational resilience for the financial sector (DORA)¹ and Commission Delegated Regulation (EU) 2025/1190², which lays down the criteria for identifying the FEs required to conduct TLPT, 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 process, including results, closure and remediation stages, as well as the type of supervisory and other relevant cooperation needed for the implementation of TLPT and for the facilitation of mutual recognition.

For FEs falling within the scope of Regulation (EU) 2022/2554 (DORA) and meeting the eligibility criteria set out in Commission Delegated Regulation (EU) 2025/1190, TLPT constitutes an explicit regulatory obligation. In accordance with the TIBER-EU framework, the tested FE is required to implement the necessary measures to appropriately manage any risks that may arise during the execution of the TLPT.

2 Statement of Adoption

The Bank of Greece (BoG) and the Hellenic Capital Market Commission (HCMC) hereby jointly declare, within the scope of their respective competences, the adoption of the revised

¹ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32022R2554>.

² <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32025R1190>.

TIBER-EU framework in Greece through this “TIBER-GR National Implementation Document”, under the name TIBER-GR.

3 TIBER-GR Implementation

3.1 Competent Authorities for Threat-Led Penetration Testing (TLPT)

Pursuant to Article 148 of Law 5193/2025, the Bank of Greece (BoG) and the Hellenic Capital Market Commission (HCMC) are the competent authorities in Greece for the application of Regulation (EU) 2022/2554 (DORA), its delegated acts, and the provisions of Chapter III of the aforementioned Law, within their respective supervisory mandates over the FEs.

As the competent authorities for TLPT in respect of the FEs falling under their supervisory remit, with the exception of systemically important institutions (SIIs), for which the European Central Bank (ECB) is the competent authority, the BoG or the HCMC, as applicable, shall be responsible for issuing the attestation referred to in Article 26(7) of Regulation (EU) 2022/2554 (DORA) and Article 14 of Commission Delegated Regulation (EU) 2025/1190, confirming that the testing was conducted under the TIBER-GR framework in accordance with the requirements of Regulation (EU) 2022/2554 (DORA) and Commission Delegated Regulation (EU) 2025/1190.

3.2 Recipients

Taking into account their respective supervisory mandates, as set out in Article 148 of Law 5193/2025, the Bank of Greece (BoG) and the Hellenic Capital Market Commission (HCMC) shall identify the FEs under their supervision that, pursuant to Article 2 of Commission Delegated Regulation (EU) 2025/1190, are required to conduct Threat-Led Penetration Testing (TLPT) in accordance with Regulation (EU) 2022/2554 (DORA) under the TIBER-GR framework. The obligation to conduct TLPT under the TIBER-GR framework does not apply to systemically important institutions (SIIs), for which the European Central Bank (ECB), within the framework of the Single Supervisory Mechanism (SSM), acts as the competent TLPT authority, and the relevant TLPT is conducted in accordance with the TIBER-EU framework.

FEs supervised by the BoG and the HCMC that are not required to conduct TLPT pursuant to Article 2 of Commission Delegated Regulation (EU) 2025/1190 may apply to participate on a voluntary basis in TLPT conducted under the TIBER-GR framework.

3.3 TLPT Cyber Team (TCT-GR)

For the purpose of coordinating TLPT, the Bank of Greece (BoG) and the Hellenic Capital Market Commission (HCMC) establish the TCT-GR (TLPT Cyber Team Greece) in accordance with Article 3 of Commission Delegated Regulation (EU) 2025/1190. The TCT-GR shall consist of staff members of the BoG and the HCMC possessing the expertise and experience required in matters relating to Threat-Led Penetration Testing (TLPT). The members of the TCT-GR shall act within the scope of the responsibilities of the respective authorities they represent.

Where a multi-jurisdictional TLPT³ involving a Greek Financial Entity (FE) is conducted, the TCT-GR shall cooperate with the competent authorities responsible for TLPT and participate in mutual recognition among them, in accordance with the provisions of Article 16 of Commission Delegated Regulation (EU) 2025/1190.

Within Greece, the TCT-GR shall serve as the national point of contact and coordination hub for TLPT conducted in respect of FEs falling within the respective supervisory remit of the two competent authorities.

3.4 Test Manager

For each TLPT, the BoG or the HCMC, as applicable, shall designate a Test Manager and at least one alternate Test Manager from among the members of the TCT-GR. In accordance with Recital 7 of Commission Delegated Regulation (EU) 2025/1190, the Test Manager shall not be involved in the supervision of the tested Financial Entity throughout the duration of the TLPT. The alternate Test Manager shall have the same rights and obligations as the Test Manager in relation to the responsibilities associated with the conduct of the TLPT.

The primary responsibility of the Test Manager is to ensure that the Financial Entity conducts the TLPT in a consistent manner and in accordance with the TIBER-GR framework, Regulation (EU) 2022/2554 (DORA) and Commission Delegated Regulation (EU) 2025/1190.

³ For more details on multi-jurisdictional testing, see section 3.7.1 of the TIBER-EU Framework.

4 Legal Disclaimer

This document and its contents are intended solely as guidance. It does not constitute legal, regulatory or professional advice, nor does it replace or interpret any legislation, regulations, technical standards, rules, frameworks or guidelines applicable to the FEs referred to in Article 2 of Regulation (EU) 2022/2554 (DORA). Neither the Bank of Greece (BoG) nor the Hellenic Capital Market Commission (HCMC), nor any person acting on their behalf, shall be liable for any use made of this document.

The “TIBER-GR National Implementation Document” has been developed in accordance with:

- the European Central Bank’s Threat Intelligence-Based Ethical Red Teaming Europe ([TIBER-EU](#)) Framework, published in February 2025;
- Regulation (EU) 2022/2554 ([DORA](#)) on digital operational resilience for the financial sector;
- Commission Delegated Regulation (EU) 2025/1190 ([Regulation \(EU\) 2025/1190](#)), supplementing Regulation (EU) 2022/2554 (DORA) by specifying elements related to Threat-Led Penetration Testing pursuant to Article [26\(11\)](#) of that Regulation; and
- Law 5193/2025 on the strengthening of the capital market and other provisions ([Law](#)).

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This document has been prepared based on the legislation, regulatory requirements and applicable frameworks in force at the time of its preparation. Its contents may be amended or updated without prior notice.

5 Contact Points

The contact details of the TCT-GR are tct@bankofgreece.gr or tct@cmc.gov.gr, depending on the competence of the respective authority, for any enquiries relating to TIBER-GR. General enquiries regarding the TIBER-EU framework should be addressed directly to tiber-eu@ecb.europa.eu. For communications with the TCT-SSM concerning TLPT conducted for

systemically important institutions (SIIs), the following email address may be used: tct-ssm@ecb.europa.eu.

6 Annex

6.1 Useful Links

Link	Source
DORA Regulation (EUR-Lex)	EUR-Lex
SSM List of Supervised Entities (ECB)	ECB
Adopting TIBER-EU will help fulfil DORA requirements (ECB Paper)	ECB
Attestation Guidance	ECB
Blue Team Test Report Guidance	ECB
Control Team Guidance	ECB
Initiation Documents Guidance	ECB
Purple Teaming Guidance	ECB
Red Team Test Plan Guidance	ECB
Red Team Test Report Guidance	ECB
Remediation Plan Guidance	ECB
Scope Specification Document Guidance	ECB
Guidance for Service Provider Procurement	ECB
Targeted Threat Intelligence Report Guidance	ECB
Test Summary Report Guidance	ECB
TIBER-EU Framework	ECB

6.2 Acronyms

Abbreviation	Term
BoG	Bank of Greece
DORA	Digital Operational Resilience Act
ECB	European Central Bank
ESCB	European System of Central Banks
FE	Financial Entity
HCMC	Hellenic Capital Market Commission
SII	Systemically Important Institution
SSM	Single Supervisory Mechanism
TCT	TLPT Cyber Team
TCT-GR	TLPT Cyber Team Greece
TIBER-EU	Threat Intelligence-Based Ethical Red Teaming Europe
TIBER-GR	Threat Intelligence-Based Ethical Red Teaming Greece
TKC	TIBER-EU Knowledge Centre
TLPT	Threat-Led Penetration Testing