DORA Exit Strategy & Exit Plan Template

Article 28(8), Regulation (EU) 2022/2554 · RTS (EU) 2024/1773 Article 10

FREE TEMPLATE — DOCX · PDF · MD | Version 1.0 · Updated 2026-07-17

What this pack contains

Part A	Entity-level exit strategy — scope, governance, the five Art 28(8) risk scenarios, alternatives-assessment method
Part B	Per-arrangement exit plan form — one per critical/important arrangement (RTS Art 10): triggers, alternatives, transition plan, contractual anchors, contingency, cost
Part C	Testing & review log — scenario, test type, findings, remediation, next test
Part D	Activation runbook — declare, notify, freeze, execute, verify, close
Part E	Completed fictional example (Nordbank SE / CloudCore GmbH, CTR-2024-018)

The regulatory ladder

Art 28(7)	Mandatory termination circumstances every ICT contract must allow: significant breach · monitoring findings capable of altering performance · evidenced ICT-risk-management weaknesses · loss of effective supervisability
Art 28(8)	For critical/important ICT services: exit strategies covering provider failure, quality deterioration, business disruption, material deployment risk, and Art 28(7) termination. Exit without business disruption, regulatory limitation, or client detriment. Plans comprehensive, documented, sufficiently tested, periodically reviewed; alternatives identified; transition plans for secure and integral transfer; contingency measures
Art 30(3)(f)	Contracts must include exit strategies with a mandatory adequate transition period — provider keeps delivering while you migrate to another provider or in-house, sized to service complexity
RTS 2024/1773 Art 10	A documented exit plan per contractual arrangement; periodic review and testing; realistic, feasible, plausible scenarios, reasonable assumptions; schedule compatible with the contract's exit terms; testing considers unforeseen and persistent service interruptions

Why paper plans fail inspections

Early ECB-led DORA inspections flagged **overly generic or untested exit strategies** as a recurring finding. BaFin's DORA implementation guidance requires exit plans built on **plausible scenarios and appropriate assumptions**, sufficiently tested.

The two failure modes to design against: (1) plans that name no concrete alternative, data format, or timeline — 'migrate to a comparable provider' is the flagged phrasing; (2) plans never tested against an unforeseen or persistent interruption — the RTS names both cases explicitly.

The schedule-fit check in Part B.5 catches the third, quieter failure: an exit plan whose timeline does not fit inside the Art 30(3)(f) transition period agreed in the contract is not executable — that is a contract-remediation item.

UK & Norway

UK: DORA does not apply; PRA SS2/21 expects a documented, maintained, tested exit strategy per material outsourcing arrangement, differentiating **stressed** (failure/insolvency) from **non-stressed** exits. Part B's trigger split maps onto SS2/21 directly.

Norway/EEA: the Norwegian DORA Act (in force 1 July 2025, Finanstilsynet) carries Art 28(8) over intact — comprehensive, well-documented, tested, regularly reviewed exit plans. Finanstilsynet expects plans to be realistic and regularly tested.

Testing cadence that survives review

Every arrangement	Tabletop / walkthrough at least annually; scenario set includes one unforeseen and one persistent interruption
Highest criticality	Partial data-extraction test with integrity verification; validate export throughput assumptions
After every test	Log findings, remediate, update the plan, set the next test date — Part C is the evidence trail
On change	Re-review when provider, service, subcontracting chain, market alternatives, or function criticality changes

Companion templates: DORA Register of Information starter (the register these plans key into) · DORA ICT provider evidence checklist (the per-provider evidence the plans rely on). Machine-readable variant of this template: orbiqhq.com/downloads/templates/dora-exit-strategy-plan.md