

EBA BSG 2025 022

Banking Stakeholder Group

1 April 2025 | 09:30 – 15:00

Location: teleconference

Banking Stakeholder Group

Minutes of the conference call on 1 April 2025

Agenda item 1: Welcome and approval of the agenda

1. The Banking Stakeholder Group (BSG) Chairperson welcomed the Members and asked whether they had any comments on the agenda of the conference call.
2. One Member was of the view that a discussion on the digital euro was premature given the ongoing legislative procedure and unclear mandate for the EBA in this regard. The Member also suggested the proposal to include a discussion on fraud concerns by the BSG. Other Member supported these views and noted that the EBA had already mandates that were of the interest of some Members, such as the EBA's mandate on forbearance, and that these should be discussed rather than topics where there was no legislative agreement yet.
3. The EBA Head of Governance and External Affairs Unit (GEA) explained that due to recent geopolitical developments, the EBA has been postponing development of some of its mandates and that the BSG would be updated on the upcoming publications.
4. The Chairperson clarified that the topic on fraud had been proposed and discussed during regular calls between coordinators of technical working groups and that this topic would be tabled at one of the forthcoming meetings.
5. The EBA Chairperson explained that as per its Funding Regulation, the EBA had a statutory duty to monitor and assess market developments, including technological innovation, to achieve a coordinated approach to the regulatory and supervisory treatment of new or innovative financial activities, and to provide advice to the co-legislators where needed. He added that in February 2025, the EBA's Board of Supervisors agreed on the continuation of the work under the EBA's priorities on innovative applications for 2024-25, including a thematic analysis related to the digital euro and its implications from three perspectives – AML/CFT, consumer protection, and business models.

6. Following the discussion, the majority of the Members approved the agenda.
7. The BSG Chairperson informed the Members that the Minutes of the 05 February 2025 meeting have been approved by the BSG in the written procedure and would be published on the EBA website.

Conclusion

8. The BSG approved the agenda of the conference call.

Agenda item 2: BSG update on the latest developments

9. The Chairperson informed that there were changes to the membership of some technical working groups (TWGs) and that he would share the updated list after the conference call. He asked the coordinators of TWGs to update their mailing lists accordingly.
10. The coordinators of TWGs updated the Members on the ongoing work in each group.
11. The coordinators of TWG 1 (Capital & Liquidity Recovery & Resolution) informed that they would be providing input to the EBA's taskforce on the efficiency of the regulatory and supervisory framework, including examples to simplify current framework, such as a proposal to consider any new reporting requirements only after analysing whether respective data were not collected already under other requirements. The coordinators also mentioned that they were planning to start collecting input on the subject of forbearance pending any forthcoming publications by the EBA.
12. The coordinators of TWG 2 (Governance & Supervision, Accounting, Reporting & Disclosure) informed that there would be several CRR mandates planned for later this year and noted that while the TWG 2 was aiming at responding to most of them, it might be challenging if several CPs were published at the same time. The coordinator asked the EBA to provide an update on the upcoming publications.
13. The coordinator of TWG 3 (Consumer Protection) updated on the establishment of the work on the access to banks branches.
14. The coordinator of TWG 4 (Sustainable Finance) informed that the TWG 4 has been discussing the preparation of a response to the Consultation paper on draft Guidelines on ESG scenario analysis and that they scheduled their first meeting in the coming days.
15. The coordinator of TWG 5 (Payments) said that the TWG 5 has been waiting for finalisation of mandates in PSD3. In the meantime, the TWG 5 has been monitoring new types of frauds which have been raising concerns and was considering preparing a note on the issue. Separately, the coordinator of the TWG 5 welcomed the EBA's initiative of meetings with countries neighbouring the EU, in particular with Moldova.

16. The coordinator of the TWG 6 (Financial Innovation & Digitalisation) informed about their contribution to the BSG response to the Consultation paper on draft RTS on the calculation and aggregation of crypto exposure values. The coordinator stressed the importance of the work on simplification and noted that the timelines were challenging. She asked the EBA whether it was planning to issue a stance on FIDA.
17. The coordinators of TWG 7 (AML/CFT) informed that the TWG would be working on the response to the AML Consultation papers and focus on the way the new AMLA would decide which institutions would be subject to direct supervision; the determination of the ML/TF risk associated with each institution; the extent and quality of information institutions would have to obtain as part of the customer due diligence process under the new AML/CFT regime, and the indicators and criteria to be considered when setting the level of pecuniary sanctions or taking administrative measures. The deadline for submission of the response was 06 June 2025.
18. The EBA Chairperson reflected on the comments raised by the Members and explained that the EBA decided to postpone the work on some mandates due to recent developments. He referred to Omnibus' proposal and ESG, and implementation of CRR3/CRD6 changes in the supervisory reporting framework. He also mentioned the ongoing work on integrated reporting and said that the aim was to achieve that when data was reported to one authority, it would not have to be reported again by the supervised entity as respective authorities would share that data. The EBA Chairperson clarified that during the legislative process on FIDA, the EBA provided an extensive input which was being taken into account by the co-legislators in Level 1 proposal. He also referred to the discussion during the Joint BoS/BSG conference call on 25 March on the issues of efficiency in regulation and welcomed the input from the Members during the discussion. He added that following the July's BoS discussion on the proposals prepared by the task force on the efficiency of the regulatory and supervisory framework, more concrete actions and proposals would be developed by the EBA, and more BSG engagement would likely be welcomed at that stage.
19. The BSG Chairperson concluded by noting the work by the TWGs and the challenging timelines for various tasks.

Agenda item 3: EBA Chairperson update on the latest developments

20. The EBA Chairperson updated the Members on the EBA's latest publications and planned events.
21. Firstly, the Chairperson informed that on 21 March, the EBA published its Q4 2024 Risk Dashboard (RDB), which disclosed aggregated statistical information for the largest EU/EEA institutions. Based on the reported data, the banking sector could be considered as healthy at this stage.

22. Secondly, the EBA Chairperson reflected on discussion during previous meetings/call related to the EC's rejection of the original draft RTS on subcontracting, which specified further elements that financial entities must determine and assess when subcontracting ICT services that support critical or important functions under the Digital Operational Resilience Act (DORA. Together with the other ESAs, the EBA prepared an opinion in which the ESAs acknowledged the assessment performed by the EC and confirmed that the amendments proposed ensure that the draft RTS was in line with the mandate set out under DORA. For this reason, the ESAs did not recommend further amendments to the RTS in addition to the ones proposed by the EC.
23. Thirdly, the EBA Chairperson said that following the entry into application in January 2025, DORA has been enhancing digital operational resilience in the EU financial sector. The ESAs aimed to implement a pan-European oversight framework for critical ICT third-party service providers (CTPPs) under the DORA. For this purpose, they have established governance, procedures, and methodologies for oversight activities.
24. With regard to the latest EBA publications, the EBA Chairperson mentioned the Report on the short to medium term objectives of its interest rate risk in the banking book (IRRBB) Heatmap published in February 2025; Joint Committee report on the functioning of the securitisation regulation published at the end of March 2025 and the Final report on amending Guidelines on ICT risk and security management published in February 2025.
25. Fourthly, the EBA Chairperson informed that in February, the EBA published its Report on data availability and feasibility of common methodology for ESG exposures. The report assessed the availability and accessibility of data related to environmental, social, and governance (ESG) risks. It explored the feasibility of introducing a standardized methodology for identifying and qualifying banking book credit exposures to ESG risks.
26. As informed during the last BSG conference call in February, the EBA has been working on a no-action letter in response to the European Commission's (EC) request related to the interplay of MICAR and the revised Payment Services Directive (PSD2). The Chairperson noted that the EBA has been finalising the letter and was planning to publish it at the end of April/beginning of May 2025.
27. The EBA Chairperson continued by mentioning upcoming public hearings on the Consultation paper on amending draft ITS on benchmarking of internal models and on Consultation Paper on Response to Call for Advice new AMLA mandates, both scheduled for 10 April 2025 and the public hearing on the Consultation paper on draft RTS on CSDR threshold planned to take place on 13 May 2025. He added that the ESAs were organising an online workshop with ICT third-party providers on the CTPP designation and the preparatory phase for the oversight framework on 14 May 2025. Finally, he referred to the ongoing discussion on a possible Delegated Act specifying the method for the determination of fees for to be paid by financial and non-financial counterparties requiring the validation of pro forma models which was open for input until 7 April 2025.

28. The Members welcomed the feedback. One Member noted that the amended Guidelines on ICT risk and security management were a good example of simplification and efficiency, as all obsolete requirements have been replaced. Other Member asked for status update on the RTS on prudent valuation and RTS on the allocation of off-balance sheet items. Another Member noted the publication of the Consumer Trends Report and asked whether there were any additional issues compared to those presented to the BSG in February 2025 by the EBA staff.
29. The EBA Chairperson acknowledged a good practice of amending the guidelines to reflect recent legislative changes. He informed that the Consumer Trends Report was published as presented to the BSG and clarified that on prudent valuation, the EBA has conducted a quantitative analysis and following the assessment, decided to postpone the finalisation of the work. The Head of GEA added that the RTS on the allocation of off-balance sheet items would be published in the coming months. The EBA Chairperson concluded by referring to the EBA's work on equivalence and confidentiality assessments and said that at one of the upcoming meetings, the EBA could present its work in this area.
30. The BSG Chairperson concluded by noting the comments raised by the Members and welcomed the proposal to discuss the EBA's equivalence work.

Agenda item 4: Risks and Vulnerabilities in the EU

31. The EBA Bank Sector Analyst (Analyst) updated the Members on the latest developments in the EU related to risks and vulnerabilities. The presentation covered market moves in view of the current geopolitical developments focusing on the recent reactions in financial markets to geopolitical uncertainty. The Analyst noted that there have been significant moves such as rising volatility, and corrections in US and other stock markets and that EU sovereign yields were higher amid expectations of increased government spending due to these geopolitical tensions. Nevertheless, he pointed that European banks' equity prices were higher and improved further despite the rising volatility. Price-to-book value of European banks' equity prices traded above 1, narrowing down the gap with their US banks peers. At the same time, spreads of banks' debt issuances remained tight. Based on Q4 2024 supervisory data, the Analyst noted that the EU/EEA banks' capitalisation and liquidity ratios remained stable. Solid profitability supported high dividend payouts and share buy-back programs. He also highlighted the rising customer loan volumes and sovereign exposures, and that asset quality only deteriorated slightly in certain segments. On the other hand, he highlighted the exacerbation of cyber risks due to worsening geopolitical developments, with peaks in distributed denial-of-service activity not least linked to geopolitical events. The Analyst concluded by summarising primary market activity and remarked that banks' debt issuances were met with high investor interest.
32. The Members welcomed the update. With regard to cyber-attacks and cyber risks, the BSG Chairperson questioned whether the EBA has been liaising with ENISA on instances of lost and/or disclosed personal data and whether there was any mechanism in place to track

these cases. He noted that data related threats have been growing and should be considered also from a consumers' and users' perspective. He also raised the question whether the EBA had a methodology to disaggregate and track valuation drivers, such as expected earnings per share and dividend yield in its analysis of banks' share prices. One Member informed about growing cyber-attacks in Nordic countries in the last three years and said that in some countries, the criminal law has been amended to address the increased cases of cyber-attacks on financial institutions which were not only external but often conducted by employees of these institutions. Another Member was of the view that solutions like the digital euro could help in dealing with some of the crypto-related issues but unfortunately, in this case, the implementation has been taking too long and may not achieve planned aims. On fees and commissions, one Member raised concerns related to their continuous increase, under the justification of compensation of diminishing profits, and stressed that there was a role for the EBA and EC to prepare a proportionality framework for the fees and commission which would not continuously negatively impact consumers. He added that without such framework, the consumers may further consider other options than traditional banking services. With regard to geopolitical tensions and related risks, one Member stressed the impact of recently introduced tariffs, in particular on their national export-orientated industry. Other Member questioned to what extent proactive risk management of banks could address threats stemming from geopolitical developments and whether banks were able to incorporate geopolitical and other risks in their models. Furthermore, the Member asked if the US banks could have comparative advantages due to softer application of Basel III requirements. One Member mentioned recent social media cases and another Member reflected on national legislative proposals that have been covering not only banking sector but also telecommunication providers and social media platforms. This Member also noted growing housing prices, raising mortgages, loans, personal credits as well as crypto-related frauds. The BSG Chairperson added a comment on profitability and positive growth of the banking sector and asked if the EBA had an overview of drivers for these developments.

33. In his response, the Analyst clarified that the EBA has been liaising with ENISA on various instances. He noted that current pay-out ratios of EU banks, at historically high levels, were likely to have a high explanatory value for share prices at present, whereas there were certain doubts about sustainability of banks' profitability. On the modelling, he explained that the banks have been using overlays and that there has been an increase in their use due to intensified geopolitical risks.
34. The EBA Chairperson reflected on regulatory changes in the US and potential impact on the EU and stressed the ongoing uncertainty.
35. The BSG Chairperson concluded by noting the comments raised by the Members.

Agenda item 5: Review of the standardised Union terminology for services linked to a payment account under Article 3(6) PAD

36. The EBA Senior Expert (Expert) introduced the item by reminding the Members that the Payment Accounts Directive (PAD) mandated the EBA to draft RTS on standardised terminology for the most common services linked to a payment account. The RTS were developed and published in 2016 and aimed at facilitating consumers comparing offers from different payment services providers (PSPs) and making informed decisions on the payment account that best suited their needs. PSPs had used the terminology specified by the EBA in two contractual documents: the pre-contractual Fee Information Document and the post-contractual Statement of Fees. The RTS introduced eight standardised terms for services linked to a payment account, as well as consumer-friendly definitions of these terms in all EU official languages, which were “Maintaining the account”; “Providing a debit card”; “Providing a credit card”; “Overdraft”; “Credit transfer”; “Standing order”; “Direct debit”; “Cash withdrawal”. While the PAD, and the RTS, have now been in force for several years, the PAD additionally required that the fulfilment of the mandate was reviewed by the EBA. The Expert informed that the EBA has been reviewing to which extent the list and underlying RTS were still fit for purpose. As part of this review, EBA staff was approaching the BSG to collect their input on i) their perception of the most common EU services linked to a payment account in the market, ii) the continued suitability of the Union standardised terminology in the EBA RTS, iii) whether other sources should be considered by the EBA and iv) if external stakeholders should be approached for input. The Expert concluded by clarifying that the EBA was planning to complete its assessment in a form of a short report in Q2 2025. Should the assessment conclude that no revision of the RTS was needed, said report would subsequently be submitted to the BoS via written procedure and also published, to demonstrate that the EBA has fulfilled the review mandate. The work would end at this point in time. Should the assessment conclude that a revision of the RTS was needed, said revision would commence and would result in the development of a Consultation Paper on the revised RTS expected to be published by the end of 2025.
37. The Members supported the work. Several Members acknowledged that as they represented their stakeholders at the European level, they did not necessarily have all national details and therefore, recommended that the EBA discuss the list of standardised terminology primarily with competent authorities (CAs). Nevertheless, the Members commented on some services. On overdraft, one Member questioned if it should be included as it was a credit service. On cash withdrawals, one Member noted different fees for this service based on use of credit/debit card, in ATM or over the counter etc. Regarding the service of maintaining the account, the Members had mixed views. Some were of the view that this was not a service, others argued that banks had to fulfil various requirements linked to the maintaining of accounts, such as AML checks, and thus it was a service. Some Members confirmed that they have not identified any needs for changes to the list of terms. One Member said that some consumers may have difficulties understanding the Fee information document. Several Members raised concerns related to dynamic currency

conversion and use of cards with dual credit/debit functions. One Member opened a discussion on deposit guarantee schemes and potential increase of the current limit. On the sources of information to be considered by the EBA in order to feed its assessment of the list, the Members mentioned, in addition to the CAs, consumer associations and civil society.

38. In her response, the Expert clarified that the CAs have developed their national lists and that the EBA was planning to consult with them to collect their feedback on these lists and how any changes to their lists may have impact on the EU standardised list.

39. The BSG Chairperson concluded by noting the Members' comments

Agenda item 6: Discussion on potential implications of the introduction of a digital euro for consumers

40. The Chairperson introduced the item by reminding the Members that at the May 2024 BSG meeting, BSG members expressed their support for EBA staff to investigate the potential implications of the introduction of a digital euro, including on consumer protection, and welcomed any opportunity to input views on matters within the EBA's sphere of competence.

41. The EBA Senior Policy Expert (Expert) continued by explaining that the EBA had a statutory duty to monitor and assess market developments, including technological innovation, to achieve a coordinated approach to the regulatory and supervisory treatment of new or innovative financial activities, and to provide advice to the co-legislators where needed. Such work was forward-looking and also informed communications to consumers (e.g. in the context of consumer financial education initiatives). In February 2025, the EBA's BoS agreed on the continuation of the work under the EBA's priorities on innovative applications for 2024-25, including a thematic analysis related to the digital euro. The Expert noted that following the publication of a report on a digital euro in October 2020, the ECB started investigating the introduction of a digital euro in 2021, moving to a preparation phase at the end of 2023. The ECB has been planning to finalise the preparation phase towards the end of 2025 and was expected to consider any next steps towards year-end. In parallel, in June 2023, the EC published the legislative proposal establishing the legal framework for a possible digital euro, that remained under discussion by the co-legislators.

42. The EBA Policy Expert continued by noting that the introduction of a digital euro may have implications in some of the areas under the EBA's mandate, including on banks' liquidity and wider business models, on consumers and on AML/CFT. As such, the EBA was planning to assess potential implications in these areas as a complement to ECB analysis. As part of this assessment, and based on the interest shown by BSG members during previous interactions on the topic in 2024, the EBA staff were keen to collect the input of BSG members on the topics related to (i) potential implications for consumers; (ii) financial inclusion and complaints handling; and (iii) tools for effective management of AML/CFT

risks and therefore, tabled a set of questions to be answered and discussed during the conference call. The Expert concluded by saying that the EBA would aim to complete its assessment of the implications of the introduction of a digital euro and present the main findings to the BoS and BSG in October. Based on the outcome of the assessment, the EBA would consider possible follow-up actions.

43. On the implications for consumers and their knowledge and understanding of benefits of a digital euro, the majority of the Members stressed that consumers had limited knowledge and were often not familiar with the digital euro at all. They argued that there were many open questions and unclear concepts, such as a difference between digital euro – crypto currencies – electronic payments as used already, in particular for young generations who are not always able to identify differences between various payment solutions. This issue has currently exacerbated as there was no clarity on the design features of a digital euro as the ECB was currently continuing the preparation phase. One Member noted that if the digital euro should be cash-like, it would have to be as anonymous as possible, non-traceable and with the least possible costs for end-users. Other Members mentioned that it was not only consumers who had limited knowledge about the digital euro but also bank employees and said that, as these were key intermediaries, the education of them should be facilitated without further delay in order to ensure consistency of messaging to consumer. One Member was of a different view and said that all education initiatives should only start once there was a final legislative framework and concrete design from the ECB. Another Member considered the education as key and noted that some groups, in particular older population, may be resistant to any new solutions and so it was important that the digital euro would be positioned as a complement (and not replacement) to cash. On the benefits, one Member was of the view that the digital euro could be beneficial for small merchants who rely on card-based payments, as the use of digital euro would be cheaper for them. Another Member stressed that the benefits could not be identified until the details of the overall concept were clearly defined. This Member added that based on current proposals, the benefits may be in the offline environment, a solution not yet covered by existing electronic payments. The Member also stressed the need for delicate communication towards consumers and warned from presenting the digital euro as safer (given that it involved central banks' sources) compared to other solutions which used commercial banks' sources. Another Member said that the use of central banks' money should be positively highlighted. One Member was of the view that physical cash had to be replaced in a digital setting, and another Member mentioned that some countries had been moving already to cashless economies and then seeing a re-introduction of cash based on consumer preferences. One Member noted that the digital euro would compete with all other types of payments with the advantage that it would always be accepted in the Eurozone – a feature that was not the case for all other existing products. This Member raised concerns regarding impacts on the broader payment services sector and said that a lot of payment service providers would be directly competing with the digital euro and that the impact on non-banks had not been assessed at all yet. One Member questioned the risk of not adopting the digital euro in the EU noting aspects relating to strategic issues and

geopolitical considerations. Other Member said that if the main reasoning for the introduction of the digital euro as a public sector solution was to keep up with technological progress of commercial subjects, the development should progress. In reaction to the discussion under a previous item on dynamic currency conversion, one Member was of the view that the adoption of the digital euro, where basic services were free, would be high, and it would be an exemplary EU invention beneficial also for those whose national currency was not in euro.

44. The BSG Chairperson noted that if the physical euro was considered to be a public good, the digital euro would be its equivalent in the digital framework. Communicating the potential role of the digital euro in the context of the strategic autonomy of the EU would be important.
45. Regarding the factors that could facilitate the use of digital euro by EU consumers, the Members named accessibility, including without a smartphone, the offering of an offline solution, a wide distribution network, and financial education. One Member reminded the Members of the implementation issues linked to the two-factor authentication in some EU Member States, including the costs of rolling-out the technology.
46. On the general challenges for EU consumers in using the digital euro, the Members were of the view that the consumers had to be informed and engaged to ensure that any rollout was successful. One Member considered habits and user experience as main challenges mainly because some consumers may be reluctant to download additional apps and register and share their data if they have been doing so already for other no/low cost digital payment services.
47. The BSG Chairperson added that in some member states much of the public discussion tends to centre on privacy and data security and suggested that more emphasis should be placed on addressing these concerns in communications to the consumers.
48. In relation to financial inclusion and complaints handling and the features of the digital euro that could help foster the financial inclusion, one Member referred to lessons learned from implementation of basic payment accounts under PAD. The Member said that the digital euro should be free of charge for basic service, mandatory to accept for all merchants and that it should be given the status of legal tender. This Member also highlighted that the reachability of the digital euro and a wide network of distributors were essential.
49. On the aspects of importance for consumers for complaints handling, the Members stressed the importance of clear reporting channels, the possibility of in-person discussion, and clarity on the roles and responsibilities of intermediaries. One Member also suggested considering existing complaints handling frameworks and facilitating integration, if possible, to reduce costs. One Member also noted the importance of mitigating fraud and leveraging existing approaches.

50. With respect to AML/CFT, tools for effective management of ML/TF risks and types of tiering (if any) to be considered to build simplified and enhanced customer due diligence, the Members noted that the AML responsibilities would fall on intermediaries who may have separate AML obligations under any rulebook for the digital euro as well as risk assessments and questioned whether this was proportionate (as compared to fully integrating with the existing approach).
51. With respect to the possibility of hampering the monitoring of ML/TF risks due the possibility of having multiple digital euro wallets per user, one Member was of the view that said option could be beneficial for consumers, and that ML/TF risks could be assessed thanks to new (AI) technologies.
52. Two Members proposed that any further discussions on the topic should also include rationale behind this project, ECB's scenario analysis, any key design considerations, and further background information.
53. The Policy Experts informed that the BSG's input would be considered in the preparation of the next discussion on the main findings of the EBA' assessment and next steps. They also invited the Members to send further feedback in writing after the conference call, including data sources which could support the EBA's assessment on business model impact, and on other elements including potential consumer-facing considerations.
54. The Chairperson concluded by noting the comments by the Members.

Agenda item 7: AOB

55. The BSG Chairperson announced the upcoming physical meetings at the EBA in Paris on 2 July, 15 October as the Joint BoS/BSG physical meeting and a physical meeting of the BSG on 16 October. The next conference call was scheduled for 11 December 2025.
56. Two Members requested whether the EBA had a list of preferential hotel rates, and one Member asked for tentative timing of the next physical BSG meeting.
57. The Head of GEA informed that the list of hotel rates would be shared by the EBA after the conference call and that the agenda of the next meeting would be shared with the Members in advance of the meeting. The tentative timing of the meeting was between 09:00 – 17:00.

Annex 1: Attendance list

Participants of the Banking Stakeholder Group conference call on 1 April 2025

Attending

First Name	Surname	Institution	Country
Alin Eugen	Iacob	AURSF	Romania
Anna-Delia	Papenberg	Nordic Financial Union	Germany
Caroline	Liesegang	AFME	Germany
Christian	Stiefmueller	Finance Watch	Germany
Christophe	Nijdam	ADAM	France
Dermott	Jewell	Consumers' association of Ireland (CAI)	Ireland
Dominique	Carriou	European Savings Banks Group	France
Edgar	Loew	Frankfurt School of Finance and Management	Germany
Erik Isak	Bengtzbøe	Eurofinas - European Federation of Finance House Associations	Sweden
Fotios	Pasiouras	MBS School of Business	Greece
Gema	Diaz-Ufano Navarro	Santander	Spain
Gonzalo	Gasos	European Banking Federation	Spain
Guillermo	De la Fuente	European Association of Corporate Treasurers	Spain
Henrik	Ramlau-Hausen	Copenhaguen Business School	Denmark
Jekaterina	Govina	Amlyze	Lithuania
Joshua	Kaplan	Satispay	France
Julia	Strau	Raiffeisen	Austria
Kęstutis	Kupšys	Lithuanian Consumers Alliance	Lithuania
Laura	Grassi	University of Milano	Italy
Laura	Nieri	University of Genova	Italy
Maria	Angiulli	Italian Banking Association	Italy
Marieke	Van Berkel	European Association of Cooperative Banks	Netherlands
Paolo Giuseppe	Grinaschi	Italian trade union for financial sector	Italy
Patricia	Bogard	Crédit Agricole	France
Patricia	Suarez Ramirez	ASUFIN	Spain
Riina	Salpakari	Nordea	Finland
Sandra	Burggraf	FIA – European Principal Traders Association	France
Sangeeta	Goswami	Human Security Collective	Netherlands

Thaer	Sabri	Electronic Money Association	United Kingdom
Vinay	Pranjivan	DECO	Portugal

EBA

Chairperson Jose Manuel Campa

Executive Director Francois-Louis Michaud

Director Meri Rimmanen
Kamil Liberadzki

Heads of Unit Philippe Allard

Experts Tea Eger
Elisabeth Noble
Andreas Pfeil
Noemie Papp
Alessia Benevelli

For the Banking Stakeholder Group

Done at Paris on 21 May 2025

[signed]

Christian Stiefmueller

BSG Chairperson