

EBA BSG 2025 030 rev. 1

Banking Stakeholder Group

2 July 2025 | 09:30 – 15:00

Location: EBA premises, Paris

Banking Stakeholder Group

Minutes of the meeting on 2 July 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 meeting.
2. The BSG Chairperson informed the Members that the Minutes of the 1 April 2025 conference call have been approved by the BSG in the written procedure and would be published on the EBA website.

Conclusion

3. The BSG approved the agenda of the meeting.

Agenda item 2: BSG update on the latest developments

4. The coordinators of TWGs updated the Members on the ongoing work in each group.
5. The coordinators of TWG 1 (Capital & Liquidity Recovery & Resolution) informed that the TWG was mainly focusing on the preparation of the presentation under item 6 in relation to the Guidelines on definition of default.
6. The coordinators of TWG 2 (Governance & Supervision, Accounting, Reporting & Disclosure) noted that the TWG has been drafting a response to the Consultation paper on the draft ITS on disclosures on ESG risks, equity exposures and the aggregate exposure to shadow banking entities.
7. The coordinator of TWG 3 (Consumer Protection) mentioned that the TWG prepared the presentation under item 6 and started initial work on their own initiative note related to access to cash and banking services.

8. The coordinator of TWG 4 (Sustainable Finance) said that the TWG closely liaised with TWG 2 on the preparation of the response to the Consultation paper on the draft ITS.
9. The coordinator of TWG 5 (Payments) and the coordinator of the TWG 6 (Financial Innovation & Digitalisation) both referred to the ongoing legislative processes, in particular with regard to FIDA.
10. The coordinators of TWG 7 (AML/CFT) mentioned the work and submission of the response to the Public Consultation on RTS in the context of the EBA's response to the European Commission's Call for advice on new AMLA mandates
11. The BSG Chairperson concluded by noting the work by the TWGs and thanked all BSG Members involved.

Agenda item 3: EBA Chairperson update on the latest developments

12. The EBA Chairperson updated the Members on the EBA's latest publications.
13. Firstly, the EBA Chairperson informed that since the previous BSG meeting in April, the EBA has published several reports in various areas. On 3 April 2025, the EBA published two Reports on the market share of subsidiaries of non-EU banks in the EU, as well as on EU banks' assets and liabilities in foreign currencies. According to the EBA's analysis, the market share of EU subsidiaries of third country banking groups amounted to 10.17% of total assets as of December 2023, mostly owing to exposures towards credit institutions and other financial corporations in the EU. Of the individual asset categories, the market share of third country players was highest in derivatives while their largest sources of income were fees and commission income and interest income from credit institutions and other financial corporations. On 4 April 2025, the EBA published its 2024 Reports on the annual market and credit risk benchmarking exercises. For the first time, the EBA also released a specific Report on the fundamental review of the trading book Alternative Standardised Approach (FRTB ASA). These exercises aimed at monitoring the consistency of risk weighted assets (RWAs) across all EU institutions authorised to use internal approaches for the calculation of capital requirements. On 15 April 2025, the EBA published its Report on Remuneration and Gender Pay Gap Benchmarking for institutions and investment firms. The Report showed a material gender pay gap in 2023 with women earning less than men. Remuneration practices in institutions remained stable between 2021 - 2023, but the ratio between the variable and fixed remuneration in investment firms increased significantly after the introduction of the Investment Firms Directive (IFD). On 15 May 2025, the EBA published an updated Report on monitoring of liquidity coverage ratio and net stable funding ratio in the EU. This update was necessary in light of the banking turmoil experienced in March 2023, which highlighted the need for enhanced supervision of various liquidity aspects resulting from the change in the interest rate environment and related trends in deposit behaviour and concentration. On 20 June, the EBA published its Report on the standardised terminology for services related to payment accounts, in which

it reviewed the standardised terms for the most common services related to payment accounts, as mandated by the Payment Accounts Directive (PAD). These standardised terms, which the EBA had issued in 2018, aimed at making it easier for consumers to make informed choices by being able to compare payment accounts fees and offers, including on a cross-border basis. The review found that the standardised terms remain fit-for-purpose across the European Union. Finally, the EBA Chairperson said the EBA together with the other ESAs, published the Joint Committee Annual Report for 2024 and the EBA separately published on 20 May, the first part of its 2024 Annual Report presenting the main achievements and activities of the organisation in fulfilling its mandates under its Work Programme over the past year.

14. Secondly, the EBA Chairperson referred to the Peer Review on the performance of stress tests by deposit guarantee schemes (DGSs) across the European Union and summarised that this comprehensive review assessed how seven national DGSs performed stress tests against benchmarks developed for the purposes of this Peer Review. The benchmarks derived from the Deposit Guarantee Schemes Directive (DGSD) and the Revised EBA Guidelines on stress tests of deposit guarantee schemes.
15. Thirdly, the EBA Chairperson mentioned that the EBA published an onboarding plan for large and other institutions, setting out the steps required for accessing and submitting information to the new Pillar 3 Data Hub (P3DH) – the EBA’s centralised platform for public disclosures under the Capital Requirements Regulation (CRR3). This initiative was a significant milestone in the EBA’s commitment to enhancing transparency and consistency in Pillar 3 disclosures across the EU financial system and promoting market discipline.
16. Fourthly, the EBA Chairperson reflected on the no Action letter advising the EU Commission, EU Council and EU Parliament to ensure that, in the long term, EU law needed to avoid a dual authorisation under two pieces of EU law for the activity of transacting electronic money tokens (EMTs). While the existing Payment Services Directive 2 (PSD2) still applied, the letter advised national competent authorities (NCAs) to enforce authorisation of PSD2 for a specified subset only of crypto asset service providers (CASPs) that transact EMTs, to do so only after a transition period that ends on 2 March 2026, and then to deprioritise specified PSD2 provisions.
17. The EBA Chairperson concluded on the recent EBA publications by noting that the EBA published the Spring 2025 edition of its risk assessment report (RAR) on which the EBA staff built their presentation under item 4.
18. The EBA Chairperson also informed that the EBA, together with the other ESAs, has been progressing the work on the designations of CTPPs and finalising data collections for the 2025 EU-wide stress test, results of which were to be published on 1 August 2025. He mentioned that the EBA was closely liaising with the newly established AMLA with an aim to ensure smooth transition of tasks between the two institutions.

19. From the perspective of the EBA internal work, the EBA Chairperson informed about the work of the specific task force focusing on the efficiency of the regulatory and supervisory framework, in particular on the production of regulatory products; reporting burden; internal working arrangements, and holistic approach of the EU prudential regulatory framework. He said that the EBA Board of Supervisors was planning to discuss proposals resulting from the work of the task force during its BoS Strategy Day later in July.
20. With regard to ongoing consultations, the EBA Chairperson invited the Members to respond to the Consultation paper on ITS on disclosures on ESG risks, equity exposures and the aggregate exposure to shadow banking entities with a deadline on 22 August 2025; Consultation paper on the Draft Regulatory Technical Standards specifying the minimum list of information to be provided to the competent authorities at the time of the notification with a deadline on 18 September 2025, and Consultation Paper - Joint ESAs Guidelines on integrating ESG risks in supervisory stress tests with a deadline on 19 September 2025. He concluded by saying that the EBA has been revising the ITS on reporting of MREL decisions, which required resolution authorities to submit to the EBA once a year, information on all MREL decisions applicable to institutions in their jurisdiction. He noted that the proposed changes were limited and that the ITS was addressed only to resolution authorities and therefore, the EBA was not planning to further consult on the revised drafting.
21. In the following discussion, the BSG Chairperson asked about next steps of the EBA on the DGS framework in the event of a political agreement on CMDI; he also raised the potential impact of a change in the US administration's regulatory stance on trans-Atlantic cooperation regarding the supervision of non-EU CTPPs. Several Members welcomed the mentioned publications, in particular with regard to investment firms and funding. A few Members asked about the designation of CTPPs under DORA, noting potential issues for designations under various legal frameworks (EU/UK). Some Members mentioned potential widening of the scope of future stress tests. One Member questioned whether the EBA was considering any simplification of data required for the stress test and also, whether the EBA as planning to simplify its Q&A process. The Member also questioned whether the EBA would publish fully loaded data for the stress test. Other Member asked about CMDI and whether the EBA would be open to discuss the lessons learnt from the stress test. One Member asked what the BSG role was in the simplification work of the EBA. Another Member questioned next steps on FRTB and the ITS on Pillar 3 ESG. One Member mentioned recent changes to capital requirements in one jurisdiction and inquired about implications for the EU banking sector as result of legislative proposals in the US. Finally, one Member asked about the Joint ESAs Consumer Protection Day.
22. The EBA Chairperson reflected on the comments raised by the Members and said that on DORA, the EU and the UK were coordinating processes. With regard to the stress test, he said that the EBA was planning to publish fully loaded information and would focus on explaining that the stress test was a risk exercise. He noted that after each exercise, the EBA prepared a lesson learnt note and as part of the post-analysis of the exercise, the EBA

considered simplification aspects. On the widening of the scope of the exercise, the EBA Chairperson informed that several institutions have been discussing a launch of a system-wide stress test to identify gaps in the financial system and how different buffers and capital requirements have been interacting. On CMDI, the EBA Chairperson noted that while the topic was high on the EU agenda, there were no new developments. He mentioned concerns in connection to latest US legislative proposals on DORA and concluded by informing the Members that the next Joint ESAs Consumer Protection Day was planned to take place in Riga, on 5 November 2025.

23. 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

24. The EBA Bank Sector Analyst (Analyst) updated the Members based on the Spring 2025 Risk Assessment Report that the EBA published on 27 June 2025. Firstly, the Analyst referred to geopolitical tensions and policy uncertainties and noted that these remained significant while driving financial market volatility and economic risks, including a slowdown in economic growth and inflation developments. Geopolitical risks and the need for sovereigns to increase spending around defence for example, may also re-ignite the sovereign-bank nexus, which during times of financial stress could still be a source of risk for the banks. The Analyst noted that EU/EEA banks' profits grew by approximately 9% in 2024, recording a Return on Equity (RoE) of 10.5% in 2024 (10.3% in 2023). However, he pointed out to rising pressure on net interest income, as lower interest rates fed into banks' margins were questioning the sustainability of these profits. Banks, so far, have successfully managed to increase their fee and trading income and to substitute the loss due to NII. Costs increased by around 2% in 2024, mainly driven by an increase in other costs (including taxes) and rising provisions. The Analysis then focused on the topic of capital buffers and said that there was an increase in capital which was primarily due to rising retained earnings and other reserves. As result of the robust capital buffers and high profitability, banks' payouts continued to rise, and banks have been anticipating a further rise in the planned dividends for 2025. The Analyst also pointed out a slight increase of non-performing loans and a notable increase in IFRS 9 stage 2 allocation of loans, driven by not only CRE, and SME related but as well as due to household loans. Despite worsening asset quality indicators, the overall outlook was more positive, supported by a lower interest rate environment and stabilisation of real estate markets. Nonetheless, given the intensified geopolitical and macroeconomic uncertainties, especially concerning tariffs, downside credit risks continue to be significant. The Analyst concluded by saying that operational risks have remained high on the agenda, affected by digitalisation, technological progress, and increased geopolitical tensions. Fraud, reputational issues, digitalisation and risks associated with financial crime (including AML concerns), and technological advancements, along with related cyber risks, were significant contributors to operational risk. The number of successful cyber-attacks has further increased.

25. The Members welcomed the update. One Member noted that increased investments into digitalisation gave new opportunities to banks which came with additional risks. Other Member reflected on operational risk, including assessment of clients during war conflicts and long-term consequences of these risks. Another Member asked about Crypto-asset Service Providers (CASPs) and the EBA's role in this regard, in particular in relation to consumer protection. The BSG Chairperson voiced his concern that a decline of regulatory cooperation with other jurisdictions, especially the US, may affect the implementation and enforceability of the MiCA framework for ARTs ("stablecoins"), especially with regard to "reverse solicitation". He also commented on potential concentration of risk in the SRT market and asked for more information on SRT investors. Members asked for clarification on the link between shadow banking and non-bank financial institutions. Several Members comments on the Bitcoin and risks for consumers. One Member noted that there was a move of credit risk from banking to the insurance sector, as part of the SRTs. The Member also questioned how prepared the sector was for potential trade war as result of imposed US tariffs. Other Member raised the issue of fees and whether there were any limits on their growth. The Member also welcomed the ESAs' initiative on the consumer warning and said that consumer organisations were prepared to help with communication towards affected groups. One Member noted that there could be a risk to the financial sector arising from the ongoing conflict in Gaza.
26. The BSG Vice-Chairperson referred to credit risk and stage 2 loans and asked for further breakdown of information which would allow more detailed analysis. He also mentioned that regardless on new MICA provisions, investing in crypto-assets by consumers should still be considered as risky and the consumers should be adequately warned about all potential risks and speculations.
27. The EBA Chairperson clarified that CASPs were, in general, within the ESMA's remit and that together with the other ESAs, the EBA has been updating the warning for consumers on the risks of crypto-assets as following MICA's entry into force, there were other aspects to be on considered by the consumers to ensure that they make informed decision. On the ongoing conflict, the EBA Chair responded that the EBA had already considered the risk relating to terrorist actions in the past and that there was merit in reviewing the risk relating to the further development of the situation in the region.
28. The EBA Director of Economic and Risk Analysis Department (ERA) explained that stage 2 loans were only one aspect that has been considered by the EBA in its analysis and should not be the only indication of the market situation. He also acknowledged that for the first time, the EU banks outperformed their US peers. On the transfer of risks between the sectors, he noted that there were legal provisions governing such situations.
29. In this response, the Analyst informed that the market for SRTs was fairly concentrated with a small number of investors, including the EIB and EBRD. On stage 2 loans, he said that increasing households' debt was mainly related to mortgages and interest-rates only mortgages related to specific jurisdiction. He acknowledged that in the past, the banks had

increased costs related to digitalisation, ICT and security but latterly, the costs remained stable. On the fees, the Analyst said that while banks were not, according to their latest updates, planning to significantly increase or decrease their fees related to deposit or notice accounts.

30. The BSG Chairperson concluded by noting the comments raised by the Members.

Agenda item 5: Draft RTS / ITS on acquisition, mergers and material operations

31. The EBA Senior Legal Expert (Expert) introduced the item by explaining that the CRD6 has introduced new harmonised tools for prudentially material operations carried out by credit institutions, financial holding companies and mixed-financial holding companies, namely: acquisition of material holdings; material transfers of assets or liabilities; and mergers or divisions. These new supervisory tools aimed to a) level the playing field across the Union, given that such operations were subject to regulation in some Member States but not in others, b) strengthen the prudential resilience of the supervised entities concerned. The Expert added that the setting of materiality thresholds aimed at ensuring proportionality and that only mergers or divisions were automatically considered material operations. The Expert clarified that the framework set out for the acquisition of material holdings and mergers and divisions [spin-offs?] was comprehensive and covered the notification, assessment and process. She briefly summarised the key aspects of each part of the framework and mentioned that for the material transfers of assets or liabilities, the CRD6 only covered the notification, without laying down a harmonised assessment requirement. The Expert continued by listing the mandates conferred to the EBA and said that there was only one single articulated RTS for all three tools and two ITSs on cooperation between the competent authorities in charge of the assessment and other authorities of financial sector entities involved. She highlighted several areas in which the EBA was planning to introduce aspects of proportionality and concluded by listing the next steps and saying that the RTS was due to be submitted to the co-legislators by January 2026.
32. The BSG Chairperson raised technical comments related to the notification of material acquisitions by way of synthetic holdings, the application of disclosure obligations to financial conglomerates without an insurance component, and the application of disclosure requirements to private-equity controlled entities on a consolidated basis. He also asked whether the draft standards provide for an ex-ante assessment of the systemic importance of resulting entities.
33. One BSG Vice-Chairperson pointed out that there were different obligations for notifications in different jurisdictions and as result, it was difficult to obtain approval for mergers and acquisitions at the same time in different countries. This had legal implications and impact on legal certainty of these processes. The Vice-Chairperson asked whether the provisions apply to banks or to their shareholders. Other BSG Vice-Chairperson referred to IFRS12 and asked the EBA to consider potential overlaps and need for alignment.

34. The Members welcome the update on the EBA's ongoing work. One Member was of the view that there were some open issues that caused uncertainty of outcomes in mergers, notably covering the competent authorities' assessment of systemic risk, Pillar 2 capital requirements, the use of internal models and the treatment of goodwill. The Member asked whether the EBA RTS would cover this ground.
35. In her response, the Expert clarified that some aspects mentioned by the Chairpersons were covered by the RTS on qualifying holdings. She also explained different notifications requirements for mergers and for acquisitions.
36. The EBA Senior Policy Expert added that the EBA would analyse links between the draft RTS/ITS and IFRS12 to identify opportunities for alignment. She acknowledged the role of the competent authorities' determinations on systemic importance but noted that these are assessed ex-post under distinct regulatory frameworks with different objectives and timelines. On Pillar 2 capital and other technical assessments she added that the EBA would further consider whether the RTS provides sufficient guidance.
37. The BSG Chairperson concluded by noting the Members' comments.

Agenda item 6: Guidelines on the application of the definition of default - BSG presentation on the forbearance measures

38. The BSG Chairperson introduced the item by announcing the publication of the consultation paper on the draft amended Guidelines on the application of the definition of default earlier that day.
39. A representative of TWG 1 presented, as a basis for following discussion, notes on forbearance measures and definition of diminished financial obligation in relation to the ongoing revision of the EBA Guidelines on the definition of default. She outlined the rationale behind the current Diminished Financial Obligation ("DFO") definition and provided some evidence on forborne exposures as well as advantages and disadvantages of having a quantitative criterion as a trigger of the non-performing status, including perceived limitations of the current criterion and unintended consequences. She also presented five options for discussion to ensure that the default classification framework remained risk-sensitive, coherent and did not disincentivise the use of legitimate and prudent forbearance strategies. These options covered removal of the 1% threshold to determine DFO, material revision of the current threshold, exemptions and exclusions from the 1% threshold as well as an option of retaining the 1% net present value (NPV) threshold. The TWG 1 representative concluded by suggesting that the mechanistic and isolated application of the current 1% delta NPV threshold revealed certain limitations and may be inadequate from a risk-based perspective, potentially impeding proactive, borrower-centric restructuring. In light of the strengthened regulatory framework, enhanced risk management practices within banks, and the growing demand for more proactive approaches, there was significant scope to better integrate quantitative and qualitative

criteria. She suggested, therefore, that there may be a need for an open and constructive dialogue to develop a classification framework for forbearance measures that could flexibly address temporary distress without compromising the accurate classification of credit deterioration.

40. The EBA Policy Expert explained the legal and technical background of the proposed amendments to the Guidelines. He recalled that the topic was discussed extensively with the industry, in particular via a workshop organised last year. The key difficulty of the matter was that the notion of a “default” was both a mere observation of the realization of the risk (in this case, a credit event following a credit loss), as well as a concept heavily used in risk management, which had operational consequences. The EBA was proposing to maintain the existing 1% threshold for NPV loss in debt restructuring, in particular to maintain a non-biased observation of the risk and an appropriate calibration of internal models. The 1% threshold was also in line with other thresholds in the regulation (e.g. day past due criteria) and should be evaluated in line with the high leverage banks face.
41. The BSG Vice-Chairperson pointed out that the “technical limitations” of the current 1% NPV presented in the introduction seemed rather grounded by the “economic differences” of the different cases, which hence justified the different outcomes observed. He also noted that the prudential framework was only one side of the issue, and there were other considerations to be taken into account: in particular, banks already had an incentive to perform early restricting if this reduced the final loss.
42. The Members welcomed the discussion and commented on the points presented by the BSG Member. One Member provided additional arguments for the retention of the 1% NPV threshold, arguing that an increase of the threshold, e.g. to 5% , would not be in line with the prudential mandate as it would become effective too late and may incentivise banks to hide the losses. Several Members questioned the most suitable NPV level, noted that there was not sufficient data available from banks to analyse the issue and one Member stressed the discussed provisions were in addition to other measures which banks had to consider with regard to their debtors. Other Member linked the topic with national consumer protection provisions, which already incorporated dedicated frameworks regarding forbearance in some Member States.
43. In her response, the BSG Member welcomed the comments by other Members and said that banks have adopted different measures in response to the introduction of the NPV criterion and therefore, there was no data that would allow concluding that 1% NPV have prevented cases of forbearance, nor was there sufficient evidence to conclude that a different threshold would have resulted in misclassification of forborne loans
44. The EBA Policy Expert added that the default did not necessarily equal the end of relationship between the bank and its clients.

45. The EBA Chairperson pointed out the potential impact of a 1% NPV loss in case of a systemic event, which had to also be taken into account when calibrating a quantitative backstop. He highlighted that the published consultation paper on the Guidelines did not exclusively focus on 1% NPV threshold and asked the Members to consider, when drafting their response to the consultation paper, the overall proposed amendments to the Guidelines. At the same time, he acknowledged that this issue was very precise and that the EBA has often been asked by its stakeholders to assess the NPV threshold and therefore, the BSG's input on the topic would be further analysed by the EBA.
46. The BSG Chairperson concluded by noting the comments by the Members and reiterated the need for a differentiated discussion, in particular by clearly separating prudential and consumer protection aspects, and by considering the economic and credit cycle in its entirety when calibrating prudential requirements.

Agenda item 7: Access to cash and banking services – BSG presentation

47. The BSG representative introduced the item by clarifying that TWG 3 agreed in developing an own-initiative paper on access to cash and banking services, related to the growth of digital services and the closing of bank's branches. The aim was to present the paper during the Joint BoS/BSG meeting in October 2025 and to maximise BSG's engagement, the tabled presentation summarised the proposed structure of the paper and the Members were invited to provide contributions. On the structure, the BSG representative said that in the paper, the focus would be first on the overview of the current situation and legal framework, followed by current trends and policy frameworks and national, EU and international level. He concluded by listing the next steps and planned finalisation of the paper in October 2025.
48. The Members supported the initiative. One Member reflected on the Iberian blackout and raised issues experienced by consumers who did not have cash available during the blackout period. Several Members noted the importance of the topic, also from the risk perspective and one Member asked what would be the EBA's role in relation to the access of cash and closing of banks' branches. Another Member was of the view that the drafted paper should not prescribe solutions but rather focus on how to address identified issues. A few Members were of a different view and said that the paper should conclude with some concrete solutions. One Member questioned whether the BSG would be in the position to provide solutions to all identified issues in the proposed paper and stressed a necessary link with digitalisation and potential future means of using cash. Another Member suggested to focus on banking concentration and financial inclusion and noted that there were many situations in which consumers could not use cash for payments. One Member stressed that the scope of the proposed paper was comprehensive and would require longer time frame and discussions and noted that there was no prescribed time limit. Other Members were of the view that that the focus of the paper should be on two main topics – access to cash and access to banking services. One Member pointed at national measures

introduced in several jurisdictions which recommended their citizens to have reserves in cash at home.

49. The EBA Chairperson clarified that the EBA had, primarily, mandates in relation to payment accounts and the EBA Expert added that access to cash was a high priority for the EU regulators and that also the PDS3/PSR proposals introduced a novelty in the landscape - cash withdrawal could be provided in retail shops and that this was a measure to improve access to cash while ATMs were declining in some countries. The Expert noted that the EBA has not conducted any direct initiative on access to cash as this has not been highlighted as a significant EU wide issue during responses collected in preparation of the last Consumer Trends Reports and when liaising with other stakeholders. Similarly, the closure of banks' branches has been a concern in only a very few jurisdictions. The Expert concluded by saying that the EBA has been monitoring the accessibility of services in a wider scope, such as reducing obstacles to access payment accounts for certain categories. Furthermore, the Expert said that in the next two years the EBA would work on another area of accessibility to banking services, i.e., de-risking, as a follow-up to the findings of the last CTR. Finally, in reaction to one Member's comment, the Expert mentioned that there was no specific mandate for the EBA in the Accessibility Act.
50. In his response, the BSG representative thanked the Member for their initial contributions and said that in order to reflect the EBA's mandate and scope of work, the paper would primarily focus on access to banking services which also covered the access to cash and the right to pay cash. He noted that the timeline was set up to allow the presentation during the joint BoS/BSG meeting in October 2025.
51. The BSG Chairperson concluded by noting the comments raised by the Members and said that the scope of the paper should be narrowed down and agreed with the proposal to focus on the access to banking services.

Agenda item 7: AOB

52. The BSG Chairperson announced the upcoming physical meetings at the EBA in Paris on 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.

Annex 1: Attendance list

Participants of the Banking Stakeholder Group meeting on 2 July 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
Edgar	Loew	Frankfurt School of Finance and Management	Germany
Erik Isak	Bengtzboe	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
Henrik	Ramlau-Hausen	Copenhaguen Business School	Denmark
Joshua	Kaplan	Satispay	France
Julia	Strau	Raiffeisen	Austria
Kęstutis	Kupšys	Lithuanian Consumers Alliance	Lithuania
Laura	Grassi	Politecnico di Milano	Italy
Laura	Nieri	University of Genova	Italy
Maria	Angiulli	Italian Banking Association	Italy
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	United Kingdom
Thaer	Sabri	Electronic Money Association	United Kingdom
Vinay	Pranjivan	DECO	Portugal

EBA

Chairperson	Jose Manuel Campa
Executive Director	Francois-Louis Michaud
Director	Kamil Liberadzki
Heads of Unit	Philippe Allard Angel Monzon

Experts	Tea Eger Achilleas Nicolaou Guillaume Olivier Anna Gardella Melania Savino Margaux Morganti Alessia Benevelli
---------	---

For the Banking Stakeholder Group

Done at Paris on 24 September 2025

[signed]

Christian Stiefmueller

BSG Chairperson