

Getting started with the European Accessibility Act (EAA): making banking services and financial e-commerce services accessible or more accessible.

In short This is the first edition in a series of AFM publications on the European Accessibility Act (EAA). This series is intended for all companies that will have to comply with this directive. This first EAA update provides an overview of the AFM's minimum expectations of these institutions with effect from 28 June 2025.

There are approximately 5.5 million people with a disability living in the Netherlands (32%). In Europe, this number stands at 101 million (27%). The European Accessibility Act (EAA) will come into force on 28 June 2025, introducing provisions to make products and online services accessible to people with disabilities. The AFM has been designated as the competent authority for the supervision of banking services and financial e-commerce services to consumers. The AFM expects your organisation to be well prepared and that steps towards meeting the directive have already been taken.

What does the AFM specifically expect from market participants in practice? This first EAA update provides an overview of our minimum expectations of institutions that will be required to comply. Our next EAA updates will focus on one or more specific themes. Where possible, we do so in line with signals from market participants. We expect to publish a new EAA update in the fall. You will receive it if you are registered for the monthly sector news email.

1. Aim of the directive: inclusion and equal access

The Accessibility Act aims to improve inclusion and equal access within the European Union. The European directive's requirements have been included in Dutch legislation, including the Financial Supervision Act and the Consumer Protection (Enforcement) Act. For financial

institutions, this means they need their digital services to be accessible to everyone, including people with motor, vision, hearing or cognitive disabilities.

It takes a great deal of effort to improve digital accessibility, however, it also offers opportunities, commercially or otherwise. It allows a larger target audience to make use of financial services and products. Additionally, a good customer journey helps people navigate your sales channels more quickly and successfully.

2. Target audience: broad

The EAA's scope is broad and will mostly apply to providers of products and services in Europe, including financial services. The AFM has been designated as the competent authority for banking services and financial e-commerce services.

- **Providing 'banking services' to consumers** means offering credit agreements, investment services/activities and ancillary services, payment services, electronic money and services related to current accounts.
- In short, **providing 'financial e-commerce services' to consumers** covers the provision of financial services via the internet, upon individual request and with a view to concluding an agreement.

Examples of organisations that will have to comply with the EAA include banks and insurers, as well as companies that only provide

online services, such as BNPL and neo-brokers. Larger investment firms, online platforms such as crowdfunding platforms and larger chains selling mortgages may also be covered by the EAA.

3. This is what the AFM expects from you with effect from 28 June 2025

Your organisation has prepared for the European Accessibility Act

- You are familiar with the EAA's provisions.
- You have performed a gap analysis of the steps needed to comply with the EAA.
- You gain expertise and further expertise on digital accessibility and embed that knowledge in your organisation.
- You gather information on bottlenecks.

Your organisation ensures accessible digital services

- Your online environment is perceivable, operable, understandable and robust (POUR).
- You meet the other requirements, such as the reporting requirement and having to post information documents on your website.

Your organisation ensures compliance with the Accessibility Act

- You have policies in place to ensure that services are and remain accessible.
- You monitor the implementation of the processes in your organisation.
- You assess to verify whether the measures taken have the intended effect.

4. What does the AFM do?

We are in continuous dialogue with the other national and international EAA supervisory authorities, aiming at a consistent interpretation of standards and a level playing field within Europe. Additionally, we offer market participants guidance on topics that prompt questions and we are setting up a hotline for market participants and consumers.

Further explanation of the requirements imposed by the European Accessibility Act is set out on our theme page '[Accessibility of \(digital\) services](#)' (in Dutch only).

Should information be missing from the theme page or if you have specific aspects you are struggling with, please notify us by sending an email to: Toegankelijkheidsrichtlijn@afm.nl. Considering the large number of questions we expect to receive, we will not be able to answer all questions individually. Instead, we will use your questions to identify the main bottlenecks. The AFM will subsequently provide the best possible interpretation by further supplementing the information on the theme page.