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EFDI. EUROPEAN FORUM OF DEPOSIT INSURERS

NEWSLETTER

Closing 2025 as EFDI Community

As everyone begins preparing for the festive season, this final newsletter of 2025 is a welcome moment to pause and look back at an active year across the EFDI community. Working Groups met in several European cities, new tools and analyses were shared, national schemes brought forward important developments, and our members continued to strengthen cooperation across borders.

In this edition, you'll find a concise overview of what moved in 2025: updates on CMDI and what lies ahead, highlights from the FinTech, Risk Management, Stress-Test and AMES Working Groups, national contributions from across Europe, and a first look toward EFDI's work in 2026.

And a small seasonal note: while the topics in this issue range from AI to payout tools and cross-border testing, one theme remains constant — the commitment of our members, even as the year comes to a close, to improving Europe's safety net.

We wish all our members, colleagues, and friends a peaceful end of the year and look forward to continuing our work together in 2026.

Editorial

From Wood Snake Yisi to Fire Horse Bingwu!

In Chinese astrology, **2025** was the **Year of the Wood Snake**: a year in which hard work and preparation will lead to significant successes.

2026 will see the arrival of a new ruler of the year: the **Fire Horse**. The year is considered to be eventful, both in a good and, especially, in a bad way.

As a European deposit insurer, you can only really relate this to one topic: **CMDI**!

Finally decided upon in the Year of the Wood Snake after lengthy preparation and seemingly endless political discussions, CMDI will be implemented in the Year of the Fire Horse. And **EFDI and all its members will ensure that this happens in a good way!**

A very busy and successful 2025

From EFDI's perspective, 2026 will be a highly interesting and busy year. Not that EFDI currently suffers from a lack of topics or work — quite the opposite. EFDI is more active and productive than ever. Several reasons explain this:

- As set out in the EFDI Strategy, the association is **strengthening its focus on ICSs and their representation**.
- Rapid technological change requires proactive engagement with topics like Bitcoin and AI — an area where the **FinTech WG** is doing excellent work.
- The **Multilateral Agreement** is being modernised, with the CBWG having finalised its revision, and the EU Committee having formally approved it.
- The **BUWG** has been highly visible throughout the CMDI process, making the **voice of practitioners** (I almost wrote: the voice of reason) heard at EU level.

These examples show the breadth of EFDI's work, but "EFDI" here truly means its *members*. **Your engagement in the Working Groups is what makes all of this possible. Thank you for your dedication**.

News from the Board

EFDI strives to keep bureaucracy low and to remain as inclusive as possible. The involvement of all (full) members in decision-making is ensured, especially on European-law matters, through the EU Committee. A Board of Directors is still necessary, however, and not only for corporate-law reasons. With support from the Secretariat, it has met ten times in 2025, **ensuring the smooth running of the organisation and overseeing its strategic direction**.

Two current initiatives deserve mention:

- Given developments in the European financial market — especially around **passporting** — the Board considers it appropriate to create a **temporary working group** to address this issue, which is highly relevant for many members. The Board is finalising the details, and the group is expected to start in 2026.
- A full revision of the **EFDI Statutes**: largely unchanged since 2007, they now need restructuring and updating. With support from Belgian counsel, the Board will prepare a revised draft for approval at the 2026 General Meeting, with ample time for consultation.

That's it for now!

In the name of the whole Board (Sonja Lill, Georgia, Alfredo, Jan, Jonathan, José María, Ignacio) let me wish you a peaceful holiday season and happy 2026!

***Stefan Tacke**, EFDI Chairman*

About Us

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Content

Looking Back at 2025 - and What It Reveals

As the year closes, it becomes clearer how much the landscape for Europe's protection schemes is shifting. Several developments that once seemed gradual — regulatory, technological, and operational — have now become structural features of the environment in which DGSs and ICSs must operate.

The Changing Role of DGSs

2025 has been a year of acceleration for the DGS and ICS community. CMDI reached political agreement, but its real significance lies in what it signals: DGSs are moving into a more demanding operating model. They will be expected to contribute more to resolution funding, work more closely with resolution authorities, and meet more consistent expectations on payout readiness, data quality, and operational resilience. The role of DGSs is becoming more technical, more involved, and more central to crisis management.

A More Evolving Payout Environment

The payout process is increasingly shaped by the changing fintech landscape. Instant payment systems and digital channels introduce complexity and speed expectations, making operational readiness more demanding. At the same time, these innovations offer opportunities to enhance efficiency and customer experience. Similarly, Artificial Intelligence brings promising tools for data analysis and automation, but also raises new challenges around governance, risk management, and compliance. Banking is increasingly digital and cross-border; depositors expect faster communication. Cases such as Austria's EURAM Bank payout delay show how quickly reimbursement obligations can collide with AML processes and sanctions, investigations, and legal uncertainty — pressures I'm sure every scheme recognises.

Where ICSs Fit Into the Picture

Investor Compensation Schemes (ICS) face similar trends. Key aspects under discussion include advancing harmonisation of coverage across clients, products, activities, and entities, and facilitating the management of cross-border cases — such as top-up arrangements — while ensuring easier access to information and actual cover for retail investors. Strengthening crisis management efficiency is critical, with emphasis on the ICS role in insolvency proceedings, effective subrogation and recovery, and guaranteed access to accurate data. Improving investor communication on ICS coverage and establishing minimum common operational standards are also priorities.

Looking Ahead to 2026

As these trends solidify, 2026 will demand even greater adaptability from DGS and ICS. Digitalisation and fintech innovation will continue to reshape our financial environment, while AI-driven tools will offer efficiency gains but also introduce governance and compliance challenges.

In short, 2026 will not just be about responding to change — it will be about building systems that thrive in a faster, more integrated, and more technology-driven financial landscape.

***Carlos Colao**,*
EFDI Secretary General

Spotlight: CMDI Under the Tree...

Gift or Burden?

As the end of the year approaches, negotiations on the EU's Crisis Management and Deposit Insurance (CMDI) framework are moving towards their final stages after the political agreement between the European Council and the European Parliament was reached this past month of June. The proposal, first presented by the European Commission in 2023, aims to update and harmonise the way the EU handles failing banks and protects depositors.

Whether this reform will truly strengthen the system — or simply make it more complex — remains a question for 2026, when the technical implications will be analysed in detail within EFDI's Working Groups.

What the CMDI reform is about

The CMDI package revises three key pieces of legislation:

- the Bank Recovery and Resolution Directive (BRRD),
- the Single Resolution Mechanism Regulation (SRMR), and
- the Deposit Guarantee Schemes Directive (DGSD).

Together, these define how authorities intervene when a bank is in trouble and how Deposit Guarantee Schemes (DGSs) operate across the EU. The Commission's goal was to make the framework more coherent, usable for small and medium-sized credit institutions, and less reliant on taxpayer support.

A larger role for DGSs

One of the main changes concerns the role of DGSs in crisis management. Under the new CMDI, DGSs could be called upon to finance resolution measures to a greater extent, such as in the sale-of-business or bridge institution tools.

This broader mandate means that DGSs could become more actively involved in the resolution process in terms of funding. While this could, in theory, make crisis responses more flexible, it also raises financial and operational concerns for the schemes that must provide these funds.

Key points of contention

Many DGSs have expressed reservations about the CMDI reform since its early stages. Although the current version of the proposal is seen as "less bad" — and more aligned with DGS preferences than the Commission's original text — it still leaves important questions open.

Super preference retained
The latest compromise maintains the "super preference" of DGSs, meaning that when a bank is liquidated, DGSs still rank ahead of other creditors when recovering funds. This is an important safeguard that many national schemes wanted to keep.

Least cost test weakened
On the other hand, the reform removes the "least cost test" principle in resolution, which currently ensures that a DGS can only intervene financially if doing so is cheaper than paying out depositors

directly, net of recoveries. The EU least cost test is an established safeguard and a recognised international best practice — reflected in the IADI Core Principles — because it limits the exposure of DGS funds

Funding responsibilities expanding
Under CMDI, DGSs would be expected to contribute to a greater extent in resolutions, while also continuing to deal with credit institutions under national insolvency procedures. In practical terms, this means that the same pool of resources may be used for multiple types of interventions, increasing the risk that funds could be depleted just when they are most needed. Many schemes are concerned about the sustainability of this approach and its potential impact on depositor confidence.

A reform still in search of clarity

The overarching question is whether the CMDI package truly simplifies the EU's crisis management landscape — or whether it adds another layer of complexity. The system already involves multiple actors — national authorities, resolution bodies, and DGSs — and the new framework may further blur the boundaries between resolution and liquidation, potentially making coordination even more challenging. For the DGS community, the CMDI reform is therefore seen as a mixed picture: an improvement in some areas, but a source of new uncertainties in others.

While certain safeguards have been preserved, others have been weakened or removed. The ultimate effect on financial stability, depositor protection, and the functioning of national schemes will only become clear once the new framework is in place.

Looking ahead

Once the legislative process concludes, EFDI's Working Groups will analyse the final text in depth throughout 2026, assessing its impact on DGS operations, funding models, and cross-border cooperation. The aim will be to help members understand the practical consequences of the new CMDI and to advocate for an implementation that preserves stability, clarity, and fairness across the European system.

For now, as policymakers aim to deliver "a new CMDI for Christmas," many in the DGS community will be watching closely—wondering whether this long-awaited package will bring a genuine improvement or simply a more complicated way of doing the same things.

CMDI-GIFT OR - BURDEN: WHAT'S YOUR TAKE?

Gift

Burden

Submit

Highlights from Across EFDI's Working Groups

THBs and Beyond: D3I's Ongoing Work for Greater Consistency

Towards Harmonised THB Protection

During the second half of 2025, the D3I Working Group focused on finalising its draft **Position Paper on Temporary High Balance Payouts (THB)**, which was presented at the EU Committee meeting in Budapest. The paper examines the legal, operational, and practical aspects of THB protection across EU Member States, including statutory definitions, SCV file treatment, reimbursement procedures, and real-life payout experiences.

It also analyses the potential impact of the CMDI proposals and provides a set of recommendations for DGSs on internal procedures, depositor communication, cross-border cooperation, and monitoring. Survey results show that THB protection conditions vary widely across jurisdictions and that THB claims remain relatively rare, with high rejection rates and most cases linked to residential property sales.

DGSs generally support harmonised EU rules — particularly a six-month protection period and a €500,000 minimum limit — while maintaining a focus on natural persons and exceptional life events. Further discussions with EU Committee members are ongoing regarding the final structure of the paper, CMDI-related updates, and the potential development of non-binding EFDI guidance on THB handling and communication.

Extending the Scope: D3I Looks Beyond EU Borders

In parallel, D3I launched a new initiative: **a project on the relationship between Deposit Guarantee Schemes and Third-Country Branches (TCBs)**. The project aims to map current practices for both inbound and outbound third-country branches, assess the consistency of DGSD application, and explore cooperation mechanisms between DGSs and third-country authorities in light of recent CRD VI supervisory reforms. A comprehensive questionnaire was circulated to EFDI and ICS members on **16 October 2025**, with a submission deadline of **30 November 2025**. The results will be analysed and discussed during the first quarter of 2026, forming the basis for D3I's next analytical paper and potential recommendations for DGSs.

Renata Kadlecova & Peter Nagy
D3I WG Co-leaders

Temporary High Balances at a Glance (EFDI D3I Survey 2025)

Coverage & Legislation

- **27 DGSs** participated in the EFDI survey (25 EU/EEA, 2 non-EU).
- **All** jurisdictions cover private residential property sales, **but less than half** protect purchases of such property.
- **Coverage levels** range from **€30,000 to unlimited** – a sixteen-fold difference.
- **Protection periods** vary between **3 and 12 months**; the **most common is 6 months**.
- **7 DGSs** explicitly exclude legal persons from THB protection.

Practical Experience

- Only **11 of 27 DGSs** have ever handled THB claims.
- In large bank failures (e.g. 120,000 depositors), **less than 0.3%** of clients claimed THB compensation.
- **Rejection rates** are over **50%** in **9 of 11** DGSs with THB experience.
- The **main THB trigger** is the sale of a private residential property.
- **Processing times** range from a few days to up to 3 months, often delayed by incomplete documentation.

CMDI Reform Feedback

- **85%** of DGSs support a 6-month unified coverage period.
- **69%** support a €500,000 minimum THB limit.
- **88%** support limiting THBs to private residential properties only.
- **81%** support restricting coverage to natural persons.
- **62%** reject the proposal for a uniform 4-month “short-term” definition for real-estate transactions.

Although Temporary High Balances apply only in exceptional life events, the EFDI survey revealed wide disparities across Europe. With greater harmonisation under the CMDI reforms on the horizon, THBs remain a small but vital element of depositor protection.

Cross-Border Cooperation: Building Readiness for Future Payouts

Our Mission: Cooperation Across Borders

The core mission of the Cross-Border Working Group (CBWG) is to **strengthen cooperation between DGSs and develop practical tools that improve the efficiency and speed of cross-border payouts**.

Data retrieval project

Following the approval in June of the Revised Cooperation Agreement and the updated Cost Matrix, the EU Committee approved, on 17 October, the revised template and content of the data retrieval project, another key element of cross-border cooperation. The data retrieval file details information on relationships between DGSs, as well as the data required by DGSs when acting as a Host in a cross-border payout.

We would like to thank **Tormod Skjaerpe (NBGF) and Arnaud Ribadeau-Dumas (FGDR)**, Co-Leaders of the Finance Sub-Group (SG), for spearheading this project.

We also encourage all EFDI EU/EEA members to fill in and submit the required information, both for the data retrieval and the cost matrix, as a way of improving DGS preparedness for potential future payout events.

Passing the Torch in the Finance SG

After ten years co-leading the Finance SG, **Arnaud Schangel (FGDR)** has decided to step aside due to professional commitments. We thank Arnaud very warmly for his many years of dedication, and for his willingness to continue contributing to the work of the SG as a member.

This co-leader position is now open. If you are interested in co-leading this important SG with **Antoaneta Geala (FGDB)**, ahead of relevant projects in the pipeline (such as the upcoming review of the EFDI H2C Rulebook), please send your expression of interest to Antoaneta (Antoaneta.Geala@fgdb.ro) and the Cross-Border WG Co-Leaders (bpeletero@fgd.es and I.G.C.Jeuken@dnb.nl).

Borja Peletero and Ivy Jeuken
CBWG Co-Leaders

Banking Union: CMDI Analysis and New Workstreams

With Council and European Parliament votes on the CMDI provisional agreement expected in the first quarter of 2026, the legislative texts are now largely stable. The Working Group will begin an in-depth analysis of the revised **BRRD**, **SRMR**, and **DGSD**. As reported at the last EU Committee in Budapest, **two workstreams** have been established, with volunteers preparing initial draft analyses. **Key topics** include bridge-the-gap funding, resolution objectives, PIA, creditor hierarchy, and all issues covered in the EFDI position papers on DGSD review.

The kick-off meeting approved the intermediate objectives, resource allocation, and the work plan to deliver a **new EFDI paper on the CMDI by the end of March**, coinciding with publication of the final texts in the **Official Journal of the EU**. The workstreams will also follow developments in the **EBA Task Force on DGSs** and share insights throughout the process — ensuring a very active year ahead for the BUWG!

Marcello Bredice & Juliane Seiter
Banking Union WG Co-leaders

EFDI Joint Meetings BUWG-CBWG-D3IWG

EFDI Headquarters, Brussels, 22-23 September 2025

EU Committee Meeting

Budapest, 16-17 October 2025

AMES Working Group – 24th Meeting in Gibraltar

The AMES Working Group held its 24th meeting on 6 November, hosted by the **Gibraltar Financial Services Resolution and Compensation Committee (FSRCC)**. Participants joined from Andorra, Gibraltar, Guernsey, Iceland, the Isle of Man, Jersey, Liechtenstein, and Malta, with additional contributions from several national Resolution Authorities. EFDI was represented in person by **Carlos Colao** and **Jonathan Pallant**.

The agenda combined updates from across the EFDI community – including the Fintech, PR & Communication, Risk Management, and Stress-Testing Working Groups – as well as a strategic overview of IADI presented by **Eva Hüpkes**.

A key highlight was a case study by **Rafik Yezza (Liechtenstein)**, who shared lessons from the **Sora Bank payout**. The Gibraltar Deposit Guarantee Scheme also demonstrated its new payout tool, planned for launch in 2026, followed by remarks from the **Hon. Nigel Feetham KC MP, Gibraltar's Minister for Justice, Trade, Industry and Taxation**, on the evolving role of deposit insurers.

The meeting concluded with an afternoon visit to landmarks such as the **Rock of Gibraltar** and the **Great Siege Tunnels**, a wine tasting at the Gibraltar Garrison Library, and a closing talk by historian **Dr Ryan Asquez**.

For any additional information, please contact johngill@fsc.gi.

Rafik Yezza
AMES WG Leader

Stress-Test Working Group: Berlin Meeting Highlights

In line with the work plan approved in June in Madrid, the Stress-Test Working Group met in Berlin on 13 November, bringing together close to 50 participants — an exceptional level of engagement that reflects the strong interest in the Group's work.

The meeting featured contributions from **Michaela Norgall (DSGV, Germany), Ljubica Pantelic (DIA, Serbia), Roman Kahanek** and **Daniel Novy (GSTF, Czech Republic)**, as well as **Ivy Jeuken, Myrna van Dijk (DNB, the Netherlands)**, and **Juliane Seiter (EdB, Germany)**. Their presentations provided a rich overview of ongoing initiatives across Europe.

Topics covered included:

- the Institutional Protection Scheme of the Savings Banks Finance Group and its approach to modelling available financial means;
- lessons learned and next steps from the Serbian DIA's tests of its new payout software and procedures;
- a stress-test exercise focusing on resolution measures to be jointly conducted by the Czech DGS and its Resolution Authority;
- and an H2C payout test between DNB and EdB designed to verify the ability to complete the key steps of an H2C payout within seven working days.

These exchanges offered valuable insights into how different systems organise their stress-testing frameworks and operational readiness, and provided useful comparative perspectives for future WG work.

The Working Group also wishes to thank Christian Helwig for hosting the meeting and for the excellent organisation at the DSGV premises.

José María Fernández Real
Stress-Test WG Leader

FinTech Working Group: Berlin Meeting Summary

The Fintech Working Group met in Berlin on 14 November, hosted by DSGV, to discuss recent developments in the fast-evolving financial landscape.

The meeting featured an update on the progress of the Digital Euro from **Manfred Richter (Digital Euro Rulebook Development WG)**. The group then turned to the strategic use of AI, with a presentation by **Oliver Gordon (FSCS)**, Co-Leader of the Risk Management WG, highlighting potential synergies between the two WGs on AI-related risks.

Participants also reviewed a preliminary draft of an upcoming survey mapping AI uses, risks, and emerging practices across DGSs and ICSs, providing feedback on its scope and structure.

The session concluded with a discussion on crypto-assets and stablecoins, including an update from **Anneka Beccarelli (EAS Liechtenstein)** on the paper "Potential Coverage of Crypto Assets for Deposit Guarantee and Investor Compensation Purposes."

The WG thanks all contributors and participants for their input.

Christian Helwig & Alessio Greco,
FinTech WG Co-Leaders

Risk Management: Workplan & New Co-Leader

The Risk Management Working Group is preparing its first dedicated activities. A meeting will take place on 3 December, focusing on two themes:

- **Artificial Intelligence** – exploring how AI can enhance DGS effectiveness while maintaining risk integrity;
- **ESG Risks** – translating ESG principles into practical risk management actions, building on the groundwork laid by the **Research WG**.

On 3 November, Melinda Friesz and Loïc Trintignac presented the **newly published Non-Binding Risk Management Policy for Deposit Guarantee Schemes**, a practical, harmonising blueprint that defines the core risks all DGSs should understand and manage, regardless of size or mandate, and supports consistent, coordinated practices across Europe.

The Working Group is also undergoing a leadership transition. **Loïc Trintignac** has stepped down from his role as Co-Leader after several years of dedicated contribution. We thank Loïc warmly for his expertise and commitment to the group's work. **Oliver Gordon**, Head of Risk & Compliance at the FSCS, has been appointed as the new Co-Leader.

Melinda Friesz & Oliver Gordon
Risk Management WG Co-leaders

PRC Committee Update: Communication, Depositor Information & Emerging Risks

The EFDI Public Relations and Communication (PRC) Committee met **in Podgorica on 9–10 October 2025** to review key developments in communication practices, depositor information, and cross-border coordination.

Strengthening DGS Communication Frameworks

The **Deposit Protection Fund of Montenegro (FZD)** presented its 2022–2025 communication strategy, highlighting several elements increasingly relevant across the EU/EEA:

- a national Memorandum of Understanding covering communication with safety-net authorities,
- defined crisis-communication procedures with clear responsibilities,
- and targeted public-information and education initiatives.

Case Study: Communication Lessons from the Fortuna Failure

The **Luxembourg DGS** shared insights from the Fortuna Bank failure, which involved a high number of complex client cases. The experience underscored the importance of early, clear general information (e.g., press releases) to reduce call volumes, and the operational value of consistent messaging during payout execution.

Cross-Border Cooperation: Updating the Cost Matrix

The PRC Committee welcomed the ongoing update of the simplified cross-border cost matrix, co-led by the **Romanian FGDB and the French FGDR**. The revised template will help Host DGSs quickly estimate and confirm operational and communication-related costs in case of a cross-border payout.

DGSD3 Depositor Information Requirements

The Committee received an update on the **DGSD3 trilogue discussions** concerning depositor information, which is expected to be further developed through **EBA Implementing Technical Standards (ITS)**. The ITS will aim to ensure consistent disclosure and communication. Drafting and adoption of the ITS are expected between the end of 2025 and the first half of 2026.

Looking Ahead: Monitoring Expansion

As part of the 2025–2026 roadmap, the PRC Committee will collect data on the rapid international expansion of credit institutions within the EU and consult with the EFDI EU Committee on how DGSs should monitor and assess such developments, especially in relation to cross-border activity and consumer awareness.

The full PRC Committee press release is available via this link.

Sylvie Godron-de Maintenant,
PRC Leader

Montenegro in Three Facts

- **Montenegro uses the euro without being part of the eurozone** — a unique situation in the Western Balkans, and an important backdrop for the work of its financial authorities.
- **Podgorica lies between the Adriatic coast and Lake Skadar National Park**, one of Europe's most significant bird-migration habitats.
- **The Deposit Protection Fund of Montenegro (FZD)** operates within an EU-candidate framework and has developed advanced communication and crisis-management tools, including a national MoU on communication with safety-net stakeholders.

United Kingdom: Deposit Protection Limit Raised to £120,000

The UK's Prudential Regulation Authority (PRA) has confirmed that, **from 1 December 2025**, the FSCS deposit protection limit will rise **from £85,000 to £120,000** per person, per authorised banking licence. The limit for Temporary High Balances will also increase, f**rom £1 million to £1.4 million**.

This adjustment reflects inflation since the last update in 2017 and aims to ensure that depositor protection remains aligned with saving patterns and financial needs. FSCS emphasises that compensation will continue to be paid within **seven working days** if a bank, building society, or credit union fails.

Alongside the change, FSCS is introducing a refreshed "FSCS Protected" badge to support clarity for consumers. The updated badge will gradually appear in branches, banking apps, and promotional materials **between December 2025 and May 2026**.

FSCS will continue coordinating with the PRA and the Bank of England to support firms during the transition and raise awareness of the new limit. Social media assets and communication materials are available on the FSCS website.

FGDB Romania: Expanding Engagement and Outreach

Interinstitutional Cooperation

The Tripartite Interinstitutional Cooperation Agreement between the National Bank of Romania (NBR), the Ministry of Finance (MF), and the Bank Deposit Guarantee Fund (FGDB) entered into force on **4 May 2023**, establishing a formal framework for joint activities. In line with this agreement, FGDB concluded bilateral cooperation agreements with the MF on **10 April 2025** and with the NBR on **18 June 2025**.

Financial Education Initiatives

Between **July and September 2025**, FGDB participated, together with partner institutions, in more than **28 financial education workshops** attended by approximately **800 pre-university teachers**.

'Costin Murgescu' Research Contest

Following the review of submitted papers, FGDB has designated the winners of the **14th edition** of the *Costin Murgescu* Research Contest, a competition dedicated to master's and doctoral students.

World Savings Day Activities

In **October 2025**, FGDB joined nationwide initiatives marking World Savings Day, providing information to students about the role of saving and the importance of developing responsible financial behaviour.

EURAM Bank Payout Case: Lessons Learned by ESA Practitioners

ESA shares an update on the EURAM Bank payout case, outlining the sequence of events and the challenges encountered during the compensation process.

In Newsletter 28 from April 2025, ESA first informed about (systemic) issues related to suspected money laundering/terrorist financing in connection with the **EURAM Bank payout case in Vienna**. What has happened since then?

As a reminder, in mid-October 2024, the **Financial Market Authority (FMA)** prohibited **EURAM Bank** from continuing its business operations with immediate effect, thereby triggering a payout case. Prior to this, a meeting had taken place between **A-FIU**, **FMA**, and **ESA**, in which ESA was informed that the A-FIU would investigate the entire (!) depositor base due to the bank's years of negligence in money-laundering prevention on the one hand, and the bank's special clientele on the other (only around 750 depositors, most of them from high-risk third countries or based in tax havens). Compensation for depositors would only be permissible after the investigation had been completed.

The A-FIU and the FMA referred to **Article 8(8) of the DGSD**, which provides for a deferral of compensation where a depositor or any person entitled to or interested in sums held in an account has been charged with an offence arising out of or in relation to money laundering. This provision was implemented in **Section 14 of the Austrian Deposit Guarantee and Investor Compensation Act** as follows:

"Compensation shall be suspended if criminal proceedings for money laundering are pending against the depositor ... or if the Financial Intelligence Unit ... has been informed by the bank. In such cases, reimbursement shall be suspended until the public prosecutor's office announces that the criminal proceedings have been legally concluded, discontinued, or otherwise terminated, or the Financial Intelligence Unit declares that there are no grounds for further prosecution; the Financial Intelligence Unit shall immediately submit this declaration to the relevant guarantee scheme once the facts of the case have been clarified."

The investigation dragged on and on, and the A-FIU did not provide ESA with any specific information on the current status of the investigation, nor did it give an estimate of how long the investigation would take.

As a result, ESA was still unable to make any compensation payments at the beginning of 2025, and the first depositors began to sue ESA for compensation.

It was not until mid-April 2025, after repeated urgings, that ESA was able to ascertain that the A-FIU had already completed its investigation and forwarded the entire file to the **Central Public Prosecutor's Office for the Prosecution of Economic Crime and Corruption in Vienna**. There, ESA was finally granted access to the files. ESA was able to determine that the investigation by the A-FIU had not led to the initiation of criminal proceedings for money laundering and terrorist financing against any of the 750 EURAM depositors.

ESA then immediately compensated the depositors, taking into account the necessary checks against the current sanctions lists.

All's well that ends well, then? No, not at all: the depositors who had sued ESA have reduced their claims by the amount of compensation paid, but are still claiming interest for the transfer made around six months later, as well as legal and court costs. The depositors are of the opinion that a general investigation of the entire depositor base by the A-FIU does not justify a deferral within the meaning of the **ESAEG**, but that a separate investigation procedure must be carried out for each depositor.

It is also interesting to note that in the court proceedings, both the A-FIU and the FMA declined to testify as witnesses, citing the administrative secrecy that must be observed.

As a result, ESA is now being sued as the defendant solely for interest and costs that it did not cause (without the A-FIU's investigation, ESA would of course have paid compensation within seven days) and, in the worst case, will also have to bear these costs. Avoidable additional costs due to administrative action?

This is a highly unsatisfactory situation, which clearly shows that the interaction between the DGS and money-laundering authorities needs to be regulated more clearly by law.

FITD – Recent Activities and Developments

External Credit Rating
On **13 June**, **Morningstar DBRS** assigned **FITD** a Long-Term Issuer Rating of "A" (Positive Trend), a Short-Term Issuer Rating of R-1 (low), and a Long-Term Senior Debt Rating of BBB (high) (Positive Trend). FITD is the first DGS to obtain an external credit rating, in line with the revised **IADI** Core Principles.

Strategic Guidelines 2025–2027
In July, FITD published its Strategic Guidelines 2025–2027, setting out its priorities for innovation and efficiency through specialised projects, while maintaining its institutional mandate and role within the financial safety net.

Renewal of Credit Facility
On **1 August**, FITD renewed the agreement for a €3 billion committed credit line with a pool of 12 member banks. The new agreement extends the previous arrangement, which expired on **3 August 2025**.

International Cooperation
During the reporting period, FITD hosted two representatives of the **Indonesia Deposit Insurance Corporation (IDIC)** as part of a secondment programme under the bilateral **MoU** signed in 2020.

Participation in IADI Events
From **9 to 11 September**, FITD took part in the IADI International Conference on Core Principles in Taipei, hosted by **CDIC**, in connection with the ad hoc EXCO meeting.

On **25–26 September**, FITD participated in the IADI Europe Regional Committee Conference in Warsaw, hosted by Poland's **BFG** on the occasion of its 30th anniversary. FITD's Director General delivered the opening remarks and joined the closing panel.

5-Countries Meeting in Vienna

The annual meeting of the deposit guarantee schemes of Austria, Germany, Liechtenstein, Luxembourg and Switzerland took place on **6–7 November in Vienna**, hosted by **ESA**. Around 40 colleagues participated in two days of exchanges covering current cases, operational tools, and cross-border developments within the five jurisdictions.

The programme included a wide range of case studies and technical updates:

- **Bankhaus Obotritia payout case** and a presentation of **EdB's new compensation platform** (Martin Bögl, EdB; Christoph Thielen, EIS).
- **EURAM Bank payout case**, with a focus on AML-related challenges (Stefan Popadić and Thomas Skotnik, ESA).
- **Investment strategy of the EdB** (Jörg Ortgies).
- Overview of recent developments in the Swiss system and an explanation of **Switzerland's deposit guarantee framework** (Gregor Frey and Siro Imber, esisuisse).
- Experience from **Liechtenstein's first payout case (Sora Bank)** (Anneka Beccarelli, EAS).
- Update on the **German cooperative sector** (Michael Fischer, BVR).
- Detailed presentation on **sanctions screening issues** (Dominique Müller-Feyen, ESF).
- Report on a **cross-border stress test with DNB colleagues** (Juliane Seiter, EdB).

A highlight of the meeting was the discussion with Oliver Schütz, Head of the Austrian resolution authority and Chair of the EBA Resolution Committee (ResCo), who provided insights into current CMDI discussions from a resolution-authority perspective.

The 2026 edition of the 5-countries meeting will be hosted by the German colleagues in Berlin.

Did you know?

The meeting venue — the Austrian Cooperative Association Schulze-Delitzsch in Vienna's old town — stands on a site of major historical significance. In 1683, this area formed part of Vienna's defensive wall during the Ottoman siege led by Grand Vizier Kara Mustafa Pasha. Some of the fiercest attacks of the siege took place exactly where the building now stands. The siege ended with the arrival of a Polish-Lithuanian relief army under King Jan Sobieski, marking a decisive turning point in the conflict and the beginning of the Ottoman Empire's long decline.

EFDI AGM 2026: The Countdown Begins!

Welcome to Romania !

We are very pleased to welcome you to **Bucharest, Romania**, from **Tuesday, 9 June to Saturday, 13 June**, for the **EFDI 2026 AGM and International Conferences**. This year's host country offers more than a meeting venue: it invites you to discover a landscape and culture that are as varied as they are memorable.

Bucharest impresses with its grand boulevards and the vast Parliament building, while only a short journey away you'll find serene hillsides, wooden churches, and castles rising out of forested valleys. Rural traditions and unspoiled nature remain part of daily life here.

Be prepared to be surprised and charmed: Romania has a way of staying with those who visit!

The official event website will go live in early spring 2026, when registrations open. From then, you'll find: detailed programme and session themes, registration and participation fees, hotel booking options, and practical information for your stay in Bucharest.

Your Week at a Glance

DAY 1: Tuesday, 9 June

- Public Relations Committee & Stress-Test WGs (11:30-12:30)
- Affiliation of Micro-European States & Financial Technology WGs (14:00-15:00)
- Investor Compensation Schemes (ICS), Risk Management & Research WGs (15:30-16:30)
- Welcome Cocktail (20:00)

DAY 2: Wednesday, 10 June

- ICS International Conference (09:00-15:30)
- EU Committee (16:00-18:30)
- ICS Dinner (20:00)

DAY 3: Thursday, 11 June

- AGM 2026 (09:30-13:00)
- DGS International Conference, Part 1 (14:30-18:30)
- EFDI Gala Dinner (20:00)

DAY 4: Friday, 12 June

- DGS International Conference, Part 2 (09:30-13:00)

DAY 5: Saturday, 13 June

- Optional Excursion (08:00-17:00)

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EFDI Working Groups List

Banking Union Working Group
Marcello Bredice and Juliane Seiter

Cross-Border Working Group
Borja Peletero and Ivy Jeuken

DGSD 3 Working Group (D3I WG)
Renata Kadlecova and Peter Gabor Nagy

Stress-Test Working Group (STWG)
José María Fernández

Financial Technology Working Group (FinTech WG)
Alessio Greco and Christian Helwig

Research Working Group
Riccardo de Lisa and Theo Kiriazidis

Investor Compensation Schemes Working Group (ICS WG)
Alan de Lacy

Affiliation of Micro-European States Working Group (AMES)
Rafik Yezza

Public Relations and Communication Committee (PRC)
Sylvie Godron-de Maintenant

Risk Management Working Group (RMWG)
Melinda Friesz and Oliver Gordon

EFDI Members List

EFDI is: 71 Members Institutions • 56 Deposit Guarantee Schemes • 15 Investor Compensation Schemes • 50 jurisdictions from enlarged Europe.

Full Members

Andorra, Andorran Deposit Guarantee Fund • **Albania,** Deposit Insurance Agency of Albania • **Armenia,** Deposit Guarantee Fund of Armenia • **Austria,** Austrian Raiffeisen Guarantee Scheme, Deposit Guarantee Scheme Austria (ESA) • **Azerbaijan,** Azerbaijani Deposit Insurance Fund • **Belgium,** Guarantee Fund • **Bosnia Herzegovina,** Deposit Insurance Agency of Bosnia and Herzegovina • **Bulgaria,** Bulgarian Deposit Insurance Fund (BDIF) • **Croatia,** Croatian Deposit Insurance Agency • **Cyprus,** Deposit Guarantee and Resolution of Credit and Other Institutions Scheme • **Czech Republic,** Financial Market Guarantee System • **Denmark,** Guarantee Fund • **Estonia,** Guarantee Fund • **Finland,** Financial Stability Authority (FFSA) • **France,** The Deposit Guarantee and Resolution Fund • **Georgia,** Deposit Insurance Agency • **Germany,** Deposit Protection Fund of the Association of German Banks, BVR Institutional Guarantee Scheme GmbH, Compensation Scheme of German Private Banks (EdB), Institutional Protection Scheme of the German Saving Banks Association • **Gibraltar,** Gibraltar Financial Services Commission • **Greece,** Hellenic Deposit and Investment Guarantee Fund (TEKE) • **Guernsey,** Guernsey Banking Deposit Compensation Scheme (GBDCS) • **Hungary,** National Deposit Insurance Fund of Hungary (NDIF) • **Iceland,** The Icelandic Financial Institutions' Guarantee Fund • **Ireland,** Central Bank of Ireland - Irish Deposit Guarantee Scheme • **Isle of Man,** Isle of man Depositors' Compensation Scheme • **Italy,** Interbank Deposit Protection Fund , Cooperative Credit Depositors' Guarantee Fund • **Jersey,** Jersey Bank Depositors Compensation Board (JDCS) • **Kosovo,** Kosovo Deposit Insurance Fund • **Latvia,** Deposit Guarantee Fund of Latvia • **Liechtenstein,** Deposit Guarantee and Investor Compensation Foundation PCC • **Lithuania,** Deposit and Investment Insurance • **Luxembourg,** The Luxembourg Association for Deposit Guarantee, Luxemburg Deposit Guarantee Scheme • **Moldova,** Deposit Guarantee Fund in the Banking System • **North Macedonia,** Deposit Insurance Fund Republic of Macedonia • **Malta,** Depositor Compensation Scheme • **Montenegro,** Deposit Protection Fund • **Norway,** The Norwegian Banks' Guarantee Fund • **Poland,** Bank Guarantee Fund • **Portugal,** Deposit Guarantee Fund • **Romania,** Bank Deposit Guarantee Fund • **San Marino,** Depositors Guarantee Fund, Central Bank of San Marino • **Serbia,** Deposit Insurance Agency • **Slovakia,** The Deposit Protection Fund • **Slovenia,** Deposit Guarantee Scheme • **Spain,** Deposit Guarantee Fund of Credit Institutions • **Sweden,** Swedish National Debt Office (SNDO) • **Switzerland,** esisuisse • **The Netherlands,** De Nederlandsche Bank • **Turkey,** Savings Deposit Insurance Fund (SDIF) • **Ukraine,** Deposit Guarantee Fund (DGF) • **United Kingdom,** Financial Services Compensation Scheme (FSCS).

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