

# FINNIUS

## **EU Accessibility Act: AFM publishes expectations of market participants**

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29 April 2025

 1 MINUTE

We wrote a [Finnius Blog](#) about it and we discussed it at length in our [Finnius Outlook 2025](#): by June 28, 2025, financial undertakings must comply with the accessibility requirements of the European [Accessibility Directive](#) (EU Accessibility Act, or **EAA**).

The AFM published its first [update](#) on April 24, 2025, which for the first time provides a clear overview of what the authority expects (at a minimum) from institutions as of June 28, 2025.

## AFM expectations

### Core

#### Expectation of the AFM

You are familiar with the EAA's provisions.

You have performed a gap analysis of the steps needed to comply with the EAA

### Well-prepared organization

You gain expertise and further expertise on digital accessibility and transfer that knowledge in your organisation

You gather information on bottlenecks

Your online environment is perceivable, operable, understandable and secure, and robust ([WCAG](#))

### Accessible (digital) services

You meet the other requirements, such as the reporting requirements and post information documents on your website

You have policies in place to ensure that services are and remain accessible

### Assurance of EAA compliance

You monitor the implementation of the processes in your organisation

You assess to verify whether the measures taken have the intended effect

## Emphasis on the broad scope

The AFM also emphasizes that the scope of the EAA is broad. The EAA covers:

- the provision of “banking services to consumers”: which includes certain investment services in addition to credit, payment services, payment accounts and electronic money; and
- the provision of financial “e-commerce services” to consumers: which may include the online offering of financial products, fund units or online intermediation.

## Road to compliance

There are still two months to go before financial undertakings must be compliant with the EEA's requirements.

In our experience, it is regularly underestimated what types of services must comply with the EAA. In addition to traditional banking services, an e-commerce service may be in scope as soon as when a financial service is offered online to consumers or clients who may be considered consumers (such as a retail investor or *high-net-worth individuals*, HWNI).

Additionally, how compliance with the EAA is achieved may be a blind spot. Investigate what tooling the undertaking (already) has in-house and what online features can be used (think screen features or accessibility featur

## Specialists



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