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EU Accessibility Act: AFM publishes expectations of market participants

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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
Well-prepared organization	You are familiar with the EAA's provisions.
	You have performed a gap analysis of the steps needed to comply EAA
	You gain expertise and further expertise on digital accessibility and that knowledge in your organisation
	You gather information on bottlenecks
Accessible (digital) services	Your online environment is perceivable, operable, understandable a robust (WCAG)
	You meet the other requirements, such as the reporting requiremer post information documents on your website
Assurance of EAA compliance	You have policies in place to ensure that services are and remain accessible
	You monitor the implementation ofthe processes in your organisati
	You assess to verify whether the measures taken have the intende

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 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 featu

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