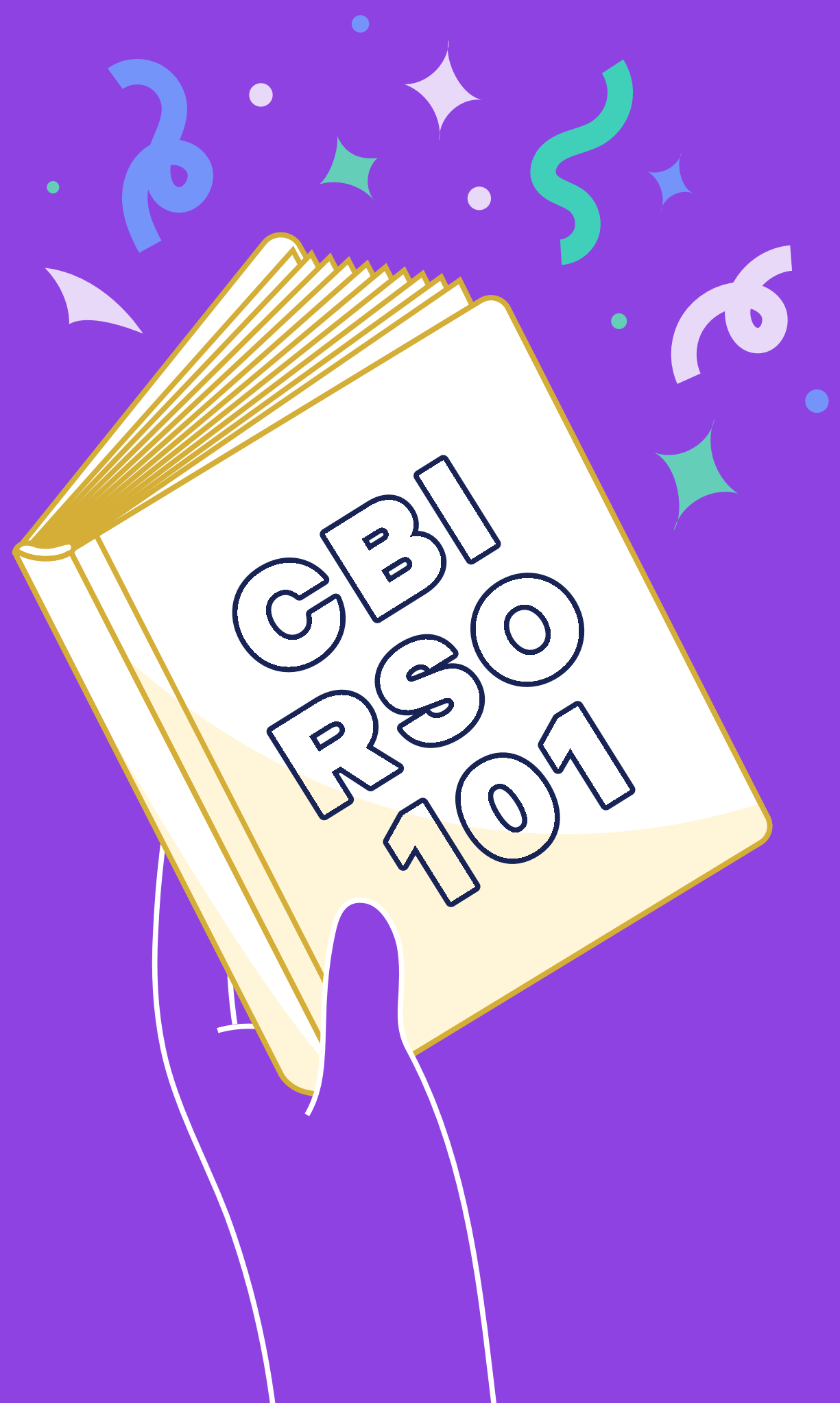


The CBI's Regulatory & Supervisory Outlook for 2026

A look at the focus
areas every PI & EMI
should be aware of



The 5 priorities

The CBI has 5 overarching priorities this year for all firms:

1

Building resilience to geopolitical & macro-financial risks

2

Securing consumer & investor interests

3

Responding to technology-driven transformation

4

Addressing environmental & societal transitions

5

Enhancing how they regulate & supervise



Also note that the CBI is the regulator under the EU AI Act for financial services in its remit. The Irish government is progressing legislation to implement this cross-sectoral regulation in Ireland by Aug 2026.

Now, what's relevant to PIs & EMIs? 🤔

For Payments & E-Money, the signal is clear:

- ✓ Safeguarding of customers' funds
- ✓ Financial crime & fraud
- ✓ Business models & financial resilience
- ✓ Operational & cyber resilience
- ✓ Culture, governance & risk management



Trends driving supervisory pressure in the Payments & E-money sector



The sector is scaling fast: 58 authorised firms. €11.8bn safeguarded (↑17%). €702bn processed (↑14%).

Business models are expanding: More firms are stacking multiple licences (incl. crypto).

Profitability is under pressure: Consolidation or exits are expected – and must be managed with consumer interests at the centre.

Safeguarding gaps remain: Root cause? Often consumer interests not fully embedded in decision-making.

Financial crime risk is high: Given large transaction volumes, international reach, and complex business models.

E-money licensing implications: The European Commission's clarification on the definition of e-money may materially impact certain business models.

Safeguarding of customers' funds

CBI EXPECTATION

Zero tolerance for safeguarding weaknesses.

Protection of customer funds is a **core supervisory priority.**

Recent inspections identified **significant deficiencies** in firms' safeguarding frameworks.

The **new Head of Safeguarding PCF** (from Feb 2026) must strengthen oversight, not simply exist in your org chart.



SUPERVISORY FOCUS (2026):

- ✓ **H1 2026:** Assessment of actions taken by firms to address gaps in safeguarding processes
- ✓ **H2 2026:** Assessment of firms implementation of new Head of Safeguarding PCF role

Financial crime & fraud

3X increase in fraudulent payments in 2024
(€57m recorded by Irish PIs & EMIs) 🤯

CBI EXPECTATION

Strong AML & fraud prevention controls are non-negotiable.

Firms must ensure systems for detection and prevention are **robust and proportionate**, and that customers who fall victim to fraud are **treated fairly**, particularly those in **vulnerable circumstances**.



SUPERVISORY FOCUS (2026):

- ✓ **H1 + H2 2026:** Assessment of AML/CTF risk management frameworks
- ✓ **H1 + H2 2026:** Review of enhanced AML REQ data to identify firm and sector-specific risks
- ✓ **H1 + H2 2026:** Thematic review of fraud controls and treatment of affected customers

Business models & financial resilience

CBI EXPECTATION

Business models must be sustainable, and wind-down plans credible and customer-focused.



Curveball: EC clarification on when e-money exists

- ❓ The European Commission has clarified when e-money exists under EMD2. Certain prepaid card models may not constitute e-money issuance.
- ❓ The CBI will engage with impacted firms who should assess the impact on their licence, permissions and overall business model.



SUPERVISORY FOCUS (2026):

- ✅ **H1 + H2 2026:** Thematic review of financial resilience, including wind-down planning
- ✅ **H1 + H2 2026:** Engagement with firms in the sector regarding the European Commission Q&A 2022_6336

Operational & cyber resilience

CBI EXPECTATION

Operational resilience and ICT risk management must be embedded and effective.

Operational and cyber **risks remain elevated.**

Firms are expected to embed **DORA** requirements, strengthen oversight of **third-party providers**, and **ensure critical services can be maintained** through disruption.



SUPERVISORY FOCUS (2026):

- ✓ **H1 2026:** Communication of findings from thematic review on IT outsourcing governance
- ✓ **H1 + H2 2026:** Follow-up on firms with operational and cyber risk weaknesses
- ✓ **H1 + H2 2026:** Assessment of DORA Registers of Information and major incident reporting
- ✓ **H1 + H2 2026:** Readiness for PSD3 and Payment Services Regulation
- ✓ **H1 + H2 2026:** Collaboration on system-wide operational resilience for payments (incl. cash)

Culture, governance & risk management

CBI EXPECTATION

Firms must address root causes of customer complaints and demonstrate effective governance.



SUPERVISORY FOCUS (2026):

- ✓ **H1 2026:** Thematic review of whether customers are being informed effectively
- ✓ **H1 + H2 2026:** Thematic review of how firms are carrying out root cause analysis of errors and applying learnings
- ✓ **H1 + H2 2026:** Review of the identification and treatment of vulnerable customers

CBI EXPECTATION

Board composition and resourcing must support sustainable growth.



SUPERVISORY FOCUS (2027):

- ✓ **2027:** Assessment of board composition, resourcing levels and governance structures
- ✓ **2027:** Review of agents and distributors model

Have questions?

🗨️ DROP ME A DM – LET'S CHAT



Fiona Jelly

Founder & CEO

