

Work program 2026

Review of 2025,
Priorities for 2026

January 2026



**strong banks
strong society**

Staying the course while remaining agile in a changing world

The Dutch banking sector is committed to contributing to a prosperous, sustainable, and inclusive society. Our 2025 work program has enabled us to make significant progress within our strategic pillars. The results achieved confirm that we are on the right track. In 2026, we will continue to build on this foundation, with focus and additional emphases in response to the rapidly changing world around us.

The international context is affected by geopolitical tensions, climate change, economic shifts, and technological acceleration. These developments place new demands on the resilience and agility of our society and the financial system. The ability to absorb shocks and respond flexibly to new circumstances is essential if we are to further strengthen our role as a reliable and solid partner in the economy and wider society.

The NVB board has therefore adopted an updated strategy for the period 2026–2029, under the motto: ‘Strong banks, strong society’. Our three strategic pillars remain unchanged: a future-proof sector, a sustainable economy, and an inclusive society. At the same time, we are setting new priorities, such as strengthening cyber resilience, European digital sovereignty, and cross-sector scenario planning. European policy influence will hold a central position across all pillars.

We will focus on themes where we can deliver demonstrable added value, while transferring operational activities to suitable organisations. However we are also making clear and deliberate choices about what we will do less of, or stop doing altogether.

This work program sets the direction for our efforts for 2026, focusing on goals, the future, and social challenges of today and tomorrow.

This document contains a selection of elements from the work program of the Dutch Banking Association (NVB). It highlights several key points intended to outline overall direction and high level priorities. No rights can be derived from this summary.



‘Building trust, progress and connection together’

2025 was a year in which the banking sector once again demonstrated the strength we possess when we focus on what truly matters: trust, transparency, and societal progress. In a time when changes unfold at great speed – from technological innovations to geopolitical uncertainties – banks have firmly fulfilled their role as a reliable and solid partner: by working actively together, by listening, and by learning.

With that in mind, we also took to the stage. As a sector, we aim to guide, enrich, and challenge the public debate. A clear example is the Banking & Society Conference, which we organised in December for leaders from the financial sector, government, business, and civil society. Together, we explored one urgent question: “What does a strong Europe require from us?”

Another key moment was the BNR election debate. The results speak for themselves: the debate attracted twice as many listeners as regular episodes and achieved an exceptionally high average listening time. This shows that our themes resonate and that the sector stands for reliability in a world where distinguishing fact from fiction is becoming increasingly difficult.

The banking sector has many topics on which we are working hard. While we cannot do justice to all the important achievements, I would like to highlight two areas in which significant progress was made over the past year. Banks have made strong efforts to improve access to appropriate financing for SMEs. The further development of the Financing Guide and

close cooperation with stakeholders such as the Ministry of Economic Affairs, the SME Financing Foundation, the Chamber of Commerce, and SME Netherlands ensures faster clarity for businesses.

I am also particularly pleased that banks, supervisors, and politicians are now increasingly engaging in a constructive dialogue on preventing money laundering. This enables us to reduce unnecessary friction for well intentioned customers while making it harder for criminals. The fact that the government is now working on proposals to grant banks access to the Personal Records Database (BRP) is, in my view, a real milestone.

With pride, I present this work program. It is not only a reflection on the past year, but above all an invitation to continue building together.

Medy van der Laan, NVB Chair

Our three strategic pillars



Future-proof sector



Sustainable economy



Inclusive society



Future-proof sector

Review of 2025 >

- Stronger digital and operational resilience
- Business climate
- Progress in the fight against money laundering
- Fraud prevention: visible impact for consumers
- SME financing
- Financing of the defence industry

Priorities for 2026 >

Ambitions

Future-proof sector **Review of 2025**

In 2025, the resilience of the sector was further strengthened during a period in which geopolitical tensions, digitalisation, and emerging risks followed each other in rapid succession. Banks made significant progress in the areas of resilience, cybersecurity, stability, and integrity.

Stronger digital and operational resilience

The sector presented an updated edition of the joint threat assessment for the Dutch financial sector: the *One Financial Threat Landscape*. It was developed in collaboration with, among others, the AIVD, NCSC, DNB and major banks. Participants particularly valued its practical applicability and the continuous improvement of the threat assessment.

During the NATO summit, the NVB was present at the National Cyber Security Centre (NCSC) in The Hague alongside several other vital sectors. The focus was on effectively sharing relevant information, supporting organisations with preventive measures, and strengthening situational awareness through coordinated incident reporting and the availability of expertise.

Within the NVB, we have established a joint resilience approach, including scenario analyses and cooperation with the business community and government to strengthen the resilience of customers, banks, and society. At the European level, Dutch expertise also became visible: participation in the EBF Cyber Security Expert Group enabled direct knowledge-sharing and joint best practices. In the Netherlands, the sector also gained a stronger position in national crisis structures through the Financial Services Resilience Committee of DNB, which was co established by the NVB.

Business climate

The NVB has worked to improve the business climate, including through joint statements with a coalition of stakeholders from the financial sector and the broader business community directed at political leaders and, in particular, parties involved in government formation.

Progress in tackling money laundering

An effective, risk based approach to preventing money laundering and financial crime remains a top priority. In 2025, substantial progress was made in European regulation, information sharing, and improving processes throughout the chain. For example, at our request, the government is now working on granting banks access to the Municipal Personal Records Database (BRP) to better prevent money laundering practices.

Public and private parties are working closely together through monthly consultations. The result: faster progress based on shared insights and more room for proportional application of measures, enabling banks to assess risks more precisely while reducing unnecessary friction for customers.

Fraud prevention: Visible impact for consumers

The sector continued to invest in an integrated approach to online fraud and mortgage fraud. New insights were developed into fraud types and methods, such as investment fraud and scripting. Medy van der Laan responded immediately by warning a large audience about scripting via *MaxMeldpunt*. Collaboration is key: we work closely with the police, Victim Support Netherlands, the Fraud Helpdesk, and other partners. We successfully participated in a parliamentary round table discussion, during which we advocated – together with a broad coalition – for securing the integrated fraud prevention approach, improving data sharing, and increasing responsibility for Big Tech.

In 2025, the NVB, together with the telecom sector, took a major step in combating bank helpdesk fraud. Since victims are on the phone in 75% of fraudulent transactions, we advocate for a legal basis to exchange call status information. Thanks to the successful joint lobbying effort and broad support in the House of Representatives, this legislative change

is now being developed. We also secured key consumer protection measures in the European Payment Services Regulation (PSR), ensuring better fraud protection while limiting liability to bank helpdesk fraud—consistent with the current goodwill framework.

The new campaign “Your emotion is your best warning against fraud” highlighted dating fraud, bank helpdesk fraud, and investment fraud involving crypto. The campaign reached millions of Dutch citizens via PR, radio, social media, online video, and print. Thanks to this campaign and new measures by banks, losses from bank helpdesk fraud fell by 20% and the number of victims decreased by 30%.

SME financing

In 2025, banks made substantial efforts to improve access to appropriate financing for SME entrepreneurs. Enhancements to the Financing Guide and close collaboration with stakeholders such as the Ministry of Economic Affairs, the SME Financing Foundation, the Chamber of Commerce, and SME Netherlands have resulted in faster clarity for businesses.

At the request of the Ministry of Economic Affairs, the NVB also provided a blueprint for the revised BMKB scheme (Government Loan Guarantee for SMEs).

In 2025, DNB published results from the pilot SME Financing Survey, providing—for the first time—reliable figures on SME financing by banks and non bank lenders. The publication shows that banks continue to hold a consistently large share in SME financing, while non bank lenders play an important role in smaller loans up to €50,000.

Financing the defence industry

Since early 2025, the NVB has participated in Defport, a public private platform that accelerates innovation and scaling in the defence sector. Scaling the defence industry is essential for safeguarding security and stability in society. Various banks play an important role in providing financial services to companies in the defence industry, such as bank accounts, guarantees, or loans.

The NVB emphasises that each bank provides financing in accordance with its own lending policy—some banks choose not to finance the defence industry for principled reasons.

The banking sector advocates for long term certainty and substantial orders, combined with appropriate pre financing by the government. This enables solid business cases on which banks can base financing decisions. Banks also seek insight into which companies are essential for strategic autonomy, enabling them to make targeted long term investments.

Future-proof sector **Priorities for 2026**

Introduction

The Dutch banking sector forms a stable and reliable foundation for our economy and prosperity, especially in times of change and uncertainty. Banks provide direction and ensure security, continuity, agility, and resilience. Our prosperity cannot be taken for granted: geopolitical developments and technological progress demand continuous adaptation, innovation, and the ability to respond flexibly to new challenges.

Banks play a key role in strengthening the competitiveness of the Netherlands and Europe. They provide a solid financial system, enable essential investments, and work together with businesses, government, and society to achieve sustainable growth.

Stable and agile banks are essential to achieving societal ambitions and enhancing strategic autonomy. This requires a level playing field in terms of regulation, taxation, and capital buffers, allowing Dutch banks to compete fairly at the European level. At the same time, it is important to engage in a public dialogue about the added value of banks. Banks connect capital to decisions that contribute to economic growth and stability. As a trusted and solid partner, we are building a future proof economy.



● **Integrated vision**

We are working towards a safe and resilient banking sector that meets the financial needs of its customers and the business community, and serves as a beacon of financial stability.

Future-proof sector **Ambitions**

○ **Ambitions**

Banks strengthen access to SME financing and increase transparency. Policymakers take concrete steps to improve the business climate for banks by simplifying regulations, reducing administrative burdens, and strengthening the Savings and Investment Union (SIU) in the Netherlands and across Europe. Through public private cooperation, we reinforce a safe and trustworthy sector that contributes to a secure society.

Themes

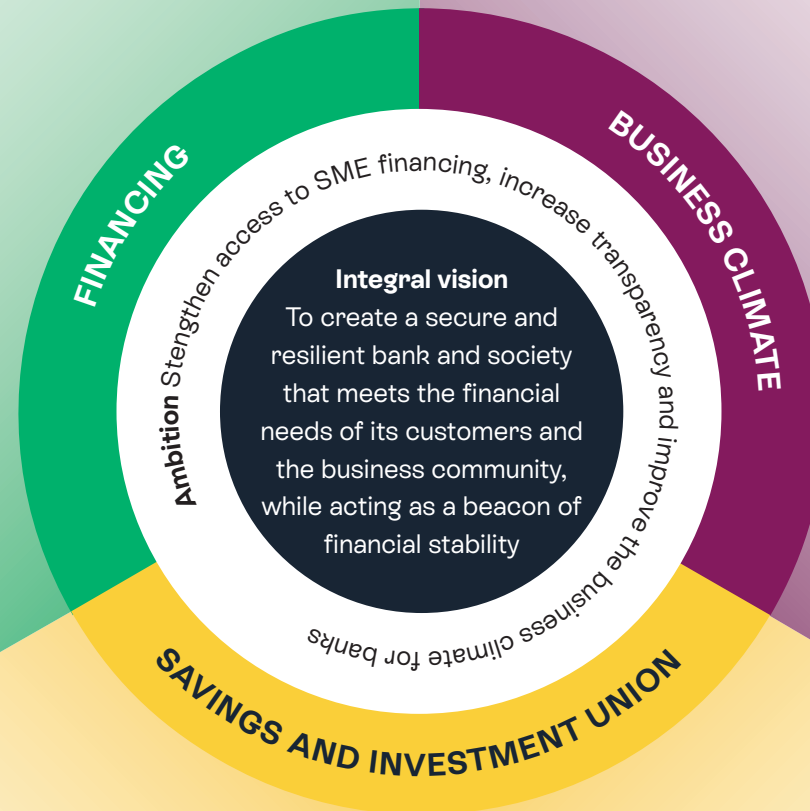
- Financing
- Savings and Investment Union
- Business climate

- Open finance & innovation
- Future-oriented banking
- Digital euro

- Resilience
- Fraud
- Gatekeeper

Future-proof sector Themes (1)

Objective The NVB, together with stakeholders (including through the National SME Financing Covenant), improves access to SME financing by increasing knowledge and insight among entrepreneurs and financiers, reducing administrative burdens, and strengthening transparency in the market. The NVB also contributes to the development of a potential National Investment Institution (NII) that complements, rather than replaces, the market.



Objective The business climate for banks is strengthened by recognising the importance of a strong, nationally rooted sector as a driver of broad prosperity in the Netherlands.

Key priorities are:

- achieving the right balance between prudential requirements and the ability to serve the economy,
- ensuring a level playing field within the Netherlands and across the EU, and
- reducing financial, fiscal, and administrative burdens.

Objective We are taking steps toward a stronger capital market and reducing fragmentation within the Netherlands and across Europe. To achieve this, we are committed to completing the Savings and Investment Union and the Banking Union.

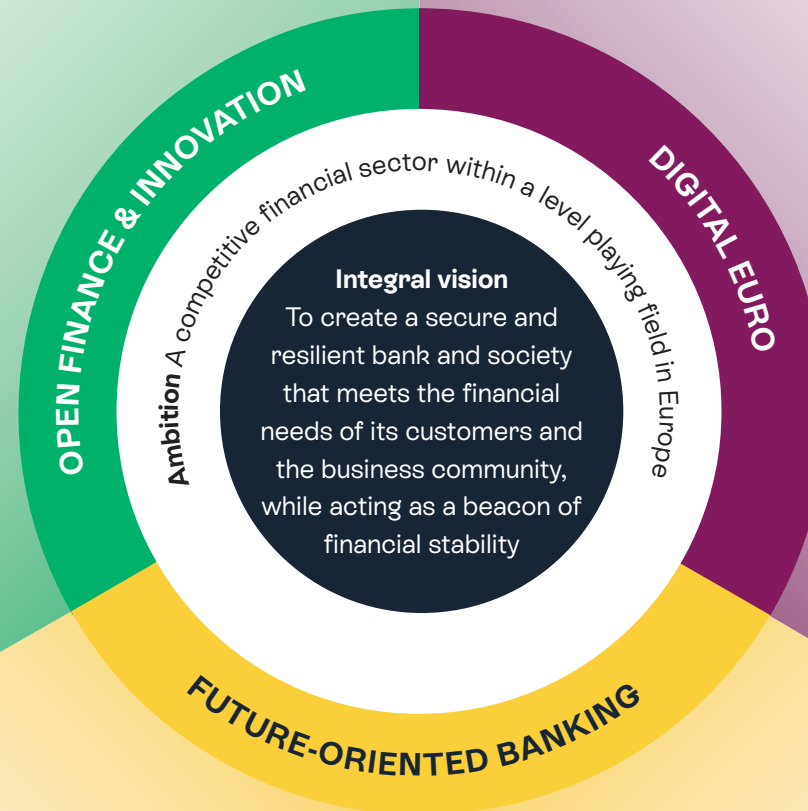
Future-proof sector Themes (2)

Objective

Open Finance: The Financial Data Access (FIDA) legislative proposal, in its current form, requires a fundamental revision.

Innovation: The NVB positions itself within the innovation and fintech domain by bringing parties together to promote innovation in shared components.

Objective The banking sector positions itself within the public debate on a future digital euro.



Objective The NVB evaluates the Future oriented Banking framework (including the Social Charter, the Banking Code, and the codes of conduct) and engages in dialogue with key stakeholders about its further development.

Future-proof sector Themes (3)

Objective The NVB strengthens the resilience of the banking sector and focuses on information sharing, cooperation with other sectors, and collaboration with the national government. We do this by preparing for various threats and threat scenarios, analysing and reducing dependencies on other sectors, and preparing for new scenarios.

Objective The NVB steers, in both Europe and the Netherlands, toward a risk based and proportionate application of, and supervision of, anti money laundering regulations and the implementation of international sanctions measures. This means applying more where needed and less where possible by prioritising risks and intensifying cooperation within the AML/CFT ecosystem.



Objective The NVB prevents fraud affecting bank customers by increasing awareness, actively lobbying for the creation of legal possibilities to share data, and promoting the adoption of fraud mitigating measures by all parties in the chain, both nationally and internationally.



Sustainable economy

Review of 2025

- Contribution to addressing foundation issues
- Insights into financing the energy transition
- Circular economy as a growth domain
- Progress in climate adaptation and water quality

Priorities for 2026

Ambitions

Sustainable economy **Review of 2025**

The transition to a sustainable and circular economy requires collaboration, knowledge sharing, and investment capacity. In 2025, banks made significant progress in strengthening their role as financiers, connector, and knowledge partners.

Contribution to addressing foundation issues

Over the past year, banks have been closely involved in addressing foundation problems. When possible within legal parameters, consumers can receive a mortgage extension from their bank to finance necessary repairs. In addition, the sector contributes to funding foundation repair through the Fonds Duurzaam Funderingsherstel (FDF: Sustainable Foundation Repair Fund), which gained national coverage in 2025. Through the FDF, loans are provided to consumers who lack sufficient income to finance the repairs themselves. Within the National Approach to Foundation Problems, the sector actively contributes to necessary policy adjustments and other preconditions, such as improved information provision and the development of a national database.

Insight into financing the energy transition

In the sectoral financing scenarios project, banks work together with stakeholders from industry, the built environment, and the mobility sector on financing pathways for these three sectors. The goal is to map out the total investment need for a climate neutral Netherlands in the period 2026–2050.

In 2025, phase 1 delivered a potential pathway toward climate neutrality by 2050, including an investment budget for 2025–2050 (broken down into five year periods), as well as an assessment of financing needs and the distribution across different funding sources. At the end of 2025, phase 2 was launched—continuing in 2026—now in collaboration with the private sector and government through a partner coalition. Broad involvement from businesses and the public sector is essential for the success of this project.

Circular economy as a growth domain

In 2025, Dutch banks strengthened their position as knowledge partners on circularity. The published definition of *circular financing* and a new scorecard provide banks with a uniform basis for assessing circular projects. Dutch expertise also gained visibility at the European level: the NVB position paper was adopted by the European Banking Federation (EBF). The successful impact session on the circular

economy further underscored the growing network and shared sense of urgency.

Progress in climate adaptation and water quality

Banks collaborated with various stakeholders to build knowledge and raise awareness of the effects of climate change on banks and their customers. Examples include the NL AAA Klimaatbestendig (climate resilient) podcasts and a knowledge dinner with leaders from politics, business, and academia. The sector also contributed to the development of the Dutch Climate Risk Portal, which centrally provides climate related data. Based on an earlier inventory of data needs within the sector, we will continue working with knowledge institutions in 2026 to make climate data more usable for end users in the banking sector. For the built environment, preparations were made for a customer focused approach, providing home owners with clear guidance and practical next steps.

In the area of water quality, a broadly supported research proposal was approved. This study, conducted together with Deltares, will further map in 2026 how insufficient water quality translates into risks and impacts for the banking sector, and, importantly, what opportunities it offers banks in supporting their customers.

Sustainable economy **Priorities for 2026**

Introduction

The Dutch banking sector is a reliable partner in the transition to a sustainable economy. Banks finance change, stimulate green investments, and actively contribute to solutions that help society move forward. We create impact by linking capital to sustainable choices.

We are building a future proof economy by investing in climate adaptation, circularity, resource autonomy, nature, and biodiversity. Banks take the lead in developing financing scenarios for sectors such as the built environment, mobility, and industry, and work together in coalitions to accelerate the energy transition. In addition, we are committed to transparency and responsible risk management regarding ESG themes, and we help strengthen the resilience of customers and society. In doing so, we reinforce our role as an expert and engaged partner.



● **Integrated vision**

A sustainable society and banking sector for 2050.

○ **Ambition**

We focus on sharing insights and knowledge to support and facilitate sustainable decision making.

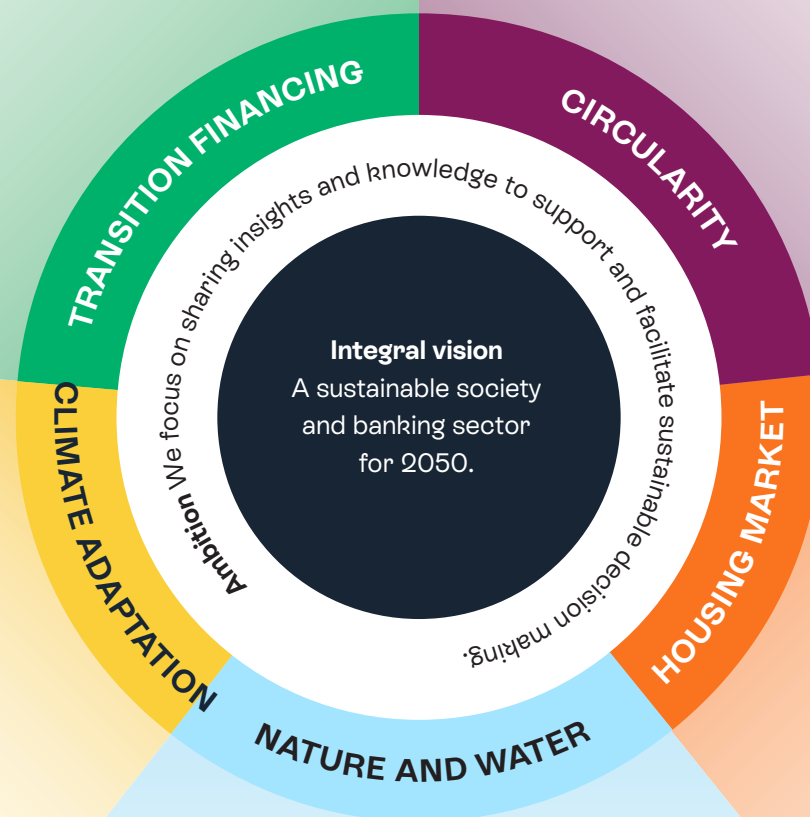
Themes

- Transition financing
- Climate adaptation
- Nature and water
- Housing market
- Circularity

Sustainable economy Themes

Objective The NVB translates the climate neutral ambition into financing by moving from identifying the required technologies, to determining investment volumes and financial feasibility, through to identifying financing sources. In doing so, we develop financing scenarios that provide insight into the total investment needs for a climate neutral Netherlands through 2050.

Objective The NVB clarifies the role of banks in climate adaptation and the responsibilities they hold in maintaining the resilience of customers and society. In addition, we take the lead in ad hoc coalitions to strengthen our position, contribute to the national approach to foundation issues, and work to bring climate risk information forward in the home buying process.



Objective The NVB accelerates the transition to a circular economy and contributes to achieving climate goals and strengthening resource autonomy.

Objective The NVB is committed to achieving the emission reduction targets for the built environment toward 2030. To do this, banks ensure that the necessary data becomes available. Based on these insights, we develop concrete improvement proposals for sustainability measures, launch a study with the Ministry of Housing and Spatial Planning (VRO) into actual energy use, work with NHG on a sustainability proposition, and actively contribute to the implementation of EPBD IV.

Objective The NVB maps the risks, impacts, and opportunities associated with declining water quality in the Netherlands for the banking sector, working in collaboration with scientific partners. Where relevant, we position ourselves externally regarding developments related to the European Water Framework Directive (WFD).



Inclusive society

Review of 2025 >

- Accessibility of payment services
- Financial health
- Addressing exclusion and discrimination
- Covenant to improve accessibility of the Business Basic Payment Account
- Transparent savings market

Priorities for 2026 >

Ambitions

Inclusive society **Review of 2025**

An inclusive banking sector means that everyone can participate in the financial system safely, independently, and fully. In 2025, progress was made on several fronts.

Accessibility of payment services

The sector successfully worked on a joint long term vision for accessible banking. Together with social partners and the government, steps were taken to improve the accessibility of banking products. Positive feedback from customer groups shows that this approach is effective. In the coming years, the vision will be further developed and embedded within banks and chain partners.

Financial health

Banks contributed widely to improving the financial health of households. Examples include Bank voor de Klas, the Socially Responsible Debt Collection Framework, and a broad package of educational and preventive initiatives. A notable educational event organised by the NVB was the film premiere “Blij dat je betaald hebt” (Glad that you’ve paid.), attended by young people and Queen Máxima.

Bank voor de Klas began the new school year strongly, with a growing number of guest teachers and participating schools. New interactive teaching materials were also launched for upper secondary and vocational education, stimulating classroom conversations about topics such as Buy Now, Pay Later, social pressure, and money related crime.

Addressing exclusion and discrimination

The approach taken in recent years has led to a clearer understanding of the issues, enabling more effective interventions. We work closely with advocacy organisations and regulators, creating greater transparency and trust. Communication has become more inclusive, processes have been tightened, and complaints are handled more quickly. Complaints are now also used as a learning tool to better identify and address risks of discrimination.

Covenant to improve access to the business basic payment account

In 2025, the sector reached agreements on access to business payment accounts. In December, a covenant was signed between the NVB, five individual banks, the Dutch Payments Association, VNO NCW, Goede Doelen Nederland, and Vrijwilligerswerk Nederland. Participating banks include ABN AMRO, ING, Rabobank, Triodos, and ASN Bank. The covenant, established in cooperation with the

Ministry of Finance and De Nederlandsche Bank, sets out the creation of a support desk where entrepreneurs and non profit organisations can ask questions about applying for a business payment account. The desk will provide information on required documentation, the application process, and reasons for rejection. Where possible, it will refer applicants to another provider after a rejection. The support desk is expected to become operational during 2026.

Transparent savings market

In consultation with societal stakeholders, the NVB explored ways to further improve transparency in the savings market. This resulted in a shared ambition aimed at giving consumers better insight into savings products and corresponding interest rates, encouraging them to make more informed decisions about building their financial resilience. Due to competition regulations, banks implemented these transparency measures individually. Most of these measures have now been introduced or are currently being implemented.

Inclusive society **Priorities for 2026**

Introduction

Diversity and inclusion are, and will remain, top priorities for the banking sector. As a sector, we carry a societal responsibility: everyone must have equal access to payment systems and financial services. Banks contribute to the financial health of their customers through a broad and accessible range of services that acknowledge and respect differences between people whether related to age, gender, religion, education, or cultural background. There is no place for discrimination.

We do not shy away from shortcomings. Instead, we work actively to prevent discrimination and to strengthen objective and fair procedures in the provision of our services. Customer privacy is strictly safeguarded, and we take measures to prevent problematic debt and to strengthen the financial resilience of consumers.

Collaboration and dialogue are central to this effort. We are a partner for and a partner of everyone in society. We believe that financial inclusion is the foundation for social progress. That is why we ensure that everyone can participate.



● **Integrated vision**

The sector remains relevant by continuously adapting to developments and societal needs. By identifying emerging issues and offering a broad, accessible range of services and products, the sector responds appropriately to the differences and diverse needs within society.

○ **Ambition**

The banking sector acts decisively on signals from society and is transparent about both successes and setbacks.

Themes

- Housing market
- Financial health
- Discrimination
- Accessible business

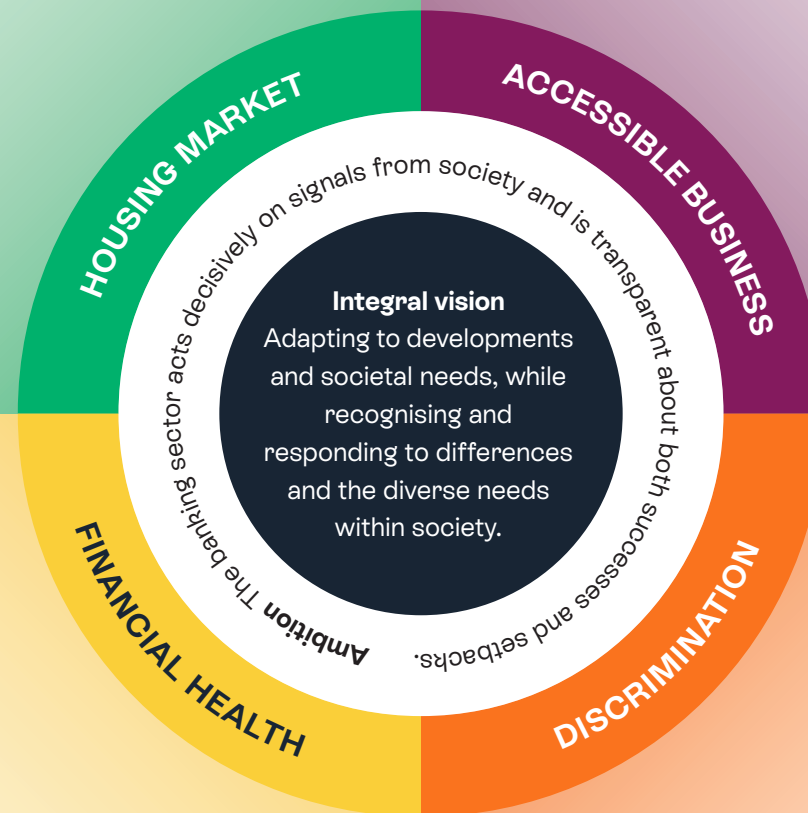
Inclusive society Themes

Objective Within the boundaries of legal requirements, consumers must have access to financing for purchasing a home. Where possible, issues arising from societal, regulatory, or supervisory perspectives are addressed collectively.

Objective Improving accessibility and communication so that entrepreneurs and non profit organisations are better informed about the application process and the reasons why an application is rejected. Through the support desk, these organisations receive independent assistance with questions about the procedure and required documentation, and are referred to another provider where they may have a higher chance of approval.

Objective The banking sector takes a leading role in raising awareness and improving understanding of people's financial situations, and stands united in preventing and addressing financial problems.

Objective Embedding the prevention of direct, indirect, and perceived discrimination in banking processes and their implementation.



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strong society**