Terms of Engagement for the Open Finance Working Group

Background of the OFWG

The EBA initially started this thought leadership journey by launching a work stream on the topic of electronic alternative payments focusing on payment innovation taking place in the consumer and retail e-commerce space and the challenges of the changes this innovation entails. The EBA Board then decided to continue these activities under a new umbrella heading that would better reflect the shift in the group's focus to topics related to Open Banking and access to the account. To this end, the e-APWG was renamed Open Banking Working Group (OBWG).

Thereafter, the OBWG engaged in an analysis of the strategic implications that Open Banking considerations and the advent of Open Application Programming Interfaces (APIs) could have for the payments industry, in connection with the requirements introduced by the revised Payment Services Directive (PSD2). The result was a conceptual framework called Digital Customer Services Interface (DCSI), which bridges the gap between electronic alternative payments methods offered in the services layer and the traditional payment systems operating in the infrastructure layer.

From there, the working group's focus moved to the strategic implications of using Open APIs in the open banking context. The OBWG published several papers dealing with various aspects of open banking, zooming in on data sharing opportunities while building digital trust and how to engage with the increasingly complex ecosystem to create reach and value for their customers and themselves. It also investigated the use of APIs by PSPs in interfacing with SMEs and delved into the potential transformation of transaction banking services for larger corporates through business-to-business API developments, hurdles and collaborative endeavours aimed at driving widespread adoption among corporates.

Banks at the forefront of open banking initiatives, which have invested in and explored these avenues for years, are now turning their attention towards an embedded finance perspective. Embedded finance builds upon the foundation of open APIs and Banking-as-a-Service (BaaS) architectures, taking it a step further by placing a strong emphasis on successful collaboration. In this context, in 2023, the Board decided to carry on the working group's activities under a new heading that would better capture the group's broadened scope. To this end, the working group was renamed Open Finance Working Group (OFWG).

In June 2024, the working group released a comprehensive guidance to EBA members on understanding the core principles of embedded finance, seizing its potential opportunities, selecting promising use cases and market segments, identifying key capabilities and providing overarching strategic insights.

Following the European Commission introduction of a proposal for a regulation aimed at establishing a framework for financial data access (FiDA), with the goal of advancing open finance and promoting data-driven finance, the EBA Board then gave mandate to the OFWG in November 2024 to consider diverse viewpoints and take informed steps to embrace the opportunities and address the challenges presented by FIDA. The paper titled “Financial Data Access: the catalyst for an open data economy” was released in June 2025.

Focus of the next phase of research to be launched in November 2025:

As FIDA continues to progress through the EU legislative review process, the Board decided to defer any FIDA-related work by the OFWG until further legal developments occur. In the meantime, the Board has tasked the OFWG with launching the next phase of research, focusing on developing a strategic perspective on the role and potential synergies of agentic AI middleware within the context of embedded finance.

Agentic AI can further accelerate the future role of technology in banks from an enabler towards data-driven BaaS offerings powering embedded finance. It is proposed that the OFWG develop a strategic view on the synergy between AI agents and embedded finance along these key questions:

- What is the strategic impact of an interrelation between agentic AI and other core concepts such as open banking, open finance, Baas and embedded finance?
- What embedded finance use cases will agentic AI enable?
- How does agentic AI alter the ecosystem dynamics in the embedded finance value chain?
- What regulatory, privacy and operational challenges & risks does agentic AI introduce or mitigate within embedded finance?
- Which critical success factors need to be in place to reap full potential of agentic AI within embedded finance?
- What are the strategic and collaborative considerations for PSPs when using agentic AI within embedded finance?

The result of this phase is a thought leadership paper on the relevance & synergy of agentic AI in the context of embedded finance that will be launched at EBAday 2026.

To support the OFWG’s discussion, some workshops will host external guest speakers representing different perspectives (incumbent banks, AI fintechs, BaaS-providers, etc.) to bring perspectives on the topic.

Membership and organisation

The working group will be composed of existing EBA OFWG members who have taken part in previous phase of research and additional EBA members or Ecosystem partners with expertise on the topic.

The OFWG will be chaired by a Board Member of the EBA. The OFWG will be facilitated by EBA staff with the support of other (external) resources as required and approved by the Board.

The Chair may invite external attendees to share experiences with the OFWG members.

Frequency, duration and effort

The OFWG will continue its mandate until completion of this phase of activities and may continue in an appropriate form afterwards, as further deliverables are approved by the EBA Board.

The OFWG will have up to 4 workshops at the premises of the EBA and will have regular online meetings during the research phase that will span from the period of November 2025 to March 2026. The OFWG will follow a 3–4-week heartbeat for the workshops / online meetings.

Participants are requested to come prepared to the workshops / online meetings by analysing the pre-read material when available. Participants are also requested to provide ongoing feedback on intermediate versions of the research report as it progresses.