AFB POLICY WORKING GROUPS

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A. Standing working groups

- **Policy and Regulatory Network (PRN):** The purpose of the PRN is to understand and represent the policy/regulatory concerns of AFB members and advocate on their behalf with regulators and policymakers.

  During meetings, AFB members have the opportunity to discuss prevalent policy and regulatory topics. Recent topics discussed include; the Chancellor's 2026 Mansion House Speech, the Financial Services and Markets Bill 2026, AFB's priorities for the Senior Managers & Certification Regime, changes to the UK transaction reporting regime, cyber risk and resilience management, and the proposed revisions to the Consumer Duty requirements.

  The PRN also undertakes the following activities:

  - Coordinates AFB members' responses to policy and other consultations and, where appropriate, convenes directly with (mainly UK) regulators/policymakers in roundtable and other formats on specific areas of interest
  - Provides regular updates (by email) on important policy/regulatory developments
  - Scans the horizon for future issues and commissions research where appropriate
  - Provides networking opportunities to members
  - Provides input into the AFB's programme of events in relation to technical/policy matters

  The Network meets in-person five times a year for a 90-minute session.

- **Climate Financial Risk:** This Working Group feeds into discussions and policy matters relating to climate-related risk. The Working Group is chaired by Bobby Charalambous, Climate Risk Director, Group Regulatory Compliance and Policy, ANZ, and meets three times a year. AFB interacts with policymakers and stakeholders including the PRA and the Climate Financial Risk Forum on this topic. The Working Group informed AFB's response to PRA CP10/25 – '10/25 – 'Enhancing banks' and insurers' approaches to managing climate-related risks – Update to SS3/19', which was submitted in July 2025. In July 2025 the Working Group reviewed AFB's response to a DBT consultation on UK SRS and to a DESNZ consultation on transition plan requirements, which was submitted in September 2025 (here).

- **Financial Crime Compliance:** This Working Group focuses on discussions and policy matters relating to Money Laundering Reporting in the UK. AFB interacts with policy makers and stakeholders, including the FCA and HM Treasury, on this topic. The Working Group is chaired by Carly Blades, Managing Director & Head of Europe FCC, The Bank of Nova Scotia, and Richard Wall, MLRO, Türkiye Is Bankasi AS, and meets quarterly. The Terms of Reference of the Working Group can be read here. The Working Group has submitted responses to a number of recent consultations. For example, the HM Treasury Consultation on improving the effectiveness of the MLRs (here) and the HM Treasury Consultation 'Anti-Money Laundering/Counter Terrorist Financing (AML/CTF) Supervision Reform: Duties, Powers and Accountability Consultation' (here). On 17 July 2025 HM Treasury published its response to the feedback received in response to its consultation on 'Improving the effectiveness of the Money Laundering Regulations' (here). The Working Group informed AFB's response to the Home Office Call for Evidence on Economic Crime Information Sharing, submitted on 18 May 2026 (here).

- **NEDs Forum:** The Non-Executive Directors (NEDs) forum is designed to address issues faced by NEDs in balancing their responsibilities to the company and regulatory expectations. The NEDs forum convenes twice a year and provides an opportunity for attendees to benchmark against other NEDs who work with international banks and allow them to share experiences. The most recent NEDs Forum was held on 8 July 2026.
- **Sanctions Compliance:** This Working Group was created in September 2025 to provide a dedicated forum for discussions on UK sanctions policy, regulatory, and enforcement issues. The Working Group Shereen George, Head of Sanctions, BNPP. The terms of reference of the WG can be found here.
- **Tax Policy:** This Working Group was created to identify tax related issues specific to international banks operating in the UK. The Working Group identifies challenges, provides insight into how that has an effect on the competitiveness of international banks operating in the UK, and proposes potential solutions or more efficient ways to operate. The Terms of Reference of the WG can be read here. The most recent Tax Policy Working Group Meeting was held on 2 July 2026.

B. Ad hoc policy working groups

- **Branch and Subsidiary Supervision:** Following the collapse of Silicon Valley Bank UK, the PRA informed AFB that it was considering a review of its approach to branch and subsidiary supervision (including SS5/21). In response, AFB formed the Working Group. The Working Group informed AFB's response (here) to PRA CP11/24 – 'International firms: Updates to SS5/21 and branch reporting'. On 9 June 2025, AFB held a seminar with the PRA at PwC to discuss the regulators' final PS6/25 – 'International Firms: Updates to SS5/21 and branch reporting'.
- **Critical Third Parties:** This Working Group was formed following the FCA/PRA DP3/22 – 'Operational resilience: Critical third parties to the UK financial sector', as well as HM Treasury's June Policy Statement on critical third parties. The Working Group informed AFB's response (here) to FCA CP24/28 and PRA CP17/24 – 'Operational Incident and Outsourcing and Third Party Reporting', in collaboration with the AFB Operational Resilience/Outsourcing Working Group, in March 2025. AFB continues to monitor developments on this topic following the publication of PS16/24 – 'Operational Resilience: Critical Third Parties to the UK Financial Sector' and joint SS6/24.
- **Culture, Conduct and Non-Financial Misconduct:** This Working Group discusses the FCA and PRA proposals regarding D&I in financial services (FCA CP23/20 and PRA CP18/23). Members contributed to AFB's responses to the consultation papers here and here. This group has also discussed the regulators' proposals regarding non-financial misconduct. In June 2025 the FCA published a Policy Statement and CP25/18: 'Tackling non-financial misconduct in financial services'. The Working Group helped inform AFB's response (here), which was submitted on 10

September 2025. (Note: On 12 December 2025, the FCA published PS25/23 - *Tacking non-financial misconduct in financial services,* setting out its feedback on responses received to CP25/18, together with its updated guidance (here).

- **EU Capital Requirements Directive VI:** The final CRD VI text was published in the EU Official Journal on 19 June 2024 (here). Members of the Working Group meet regularly to discuss the implementation of CRD VI (Article 21c) with peers and increase their understanding of the requirements. The Working Group fed into AFB's position paper (June 2026) on the potential use of the reverse solicitation exemption, as well as other exemptions, in the context of cross border lending (here). The most recent meeting of the Working Group was held on 22 July 2026.
- **Financial Services Skills:** In 2020 the AFB became a partner member of the Financial Services Skills Commission (FSSC), which aims to ensure that the financial services sector has the talent and skills it needs for the future. This Working Group also receives biannual updates on the work of FSSC. (Note: Please see AFB's FSSC update document, which outlines the FSSC's activities from September 2025 to June 2026 (here)).
- **Operational Resilience/Outsourcing:** The Working Group was initially formed in 2020 in response to PRA and FCA consultation papers on operational resilience and outsourcing. On 5 February 2025 the PRA held a roundtable to discuss with the Working Group its supervisory expectations for category 2-4 subsidiaries on operational resilience ahead of the 31 March 2025 deadline for the full implementation of all aspects of the PRA's operational resilience policy (SS1/21). In March 2025 the WG informed AFB's response (here) to FCA CP24/28 and PRA CP17/24 – 'Operational Incident and Outsourcing and Third Party Reporting', in collaboration with the AFB Critical Third Parties Working Group.
- **PRA Future Banking Data:** This Working Group was originally formed in March 2021 to discuss the Bank of England's data transformation plan, aimed at improving alignment of data collections with the needs of day-to-day supervision, improving integration and streamlining of data collections, and ensuring the PRA has the necessary data to carry out its future policymaking responsibilities. In line with its strategy to run an efficient and modern regulator, in spring 2025 the PRA relaunched this initiative as Future Banking Data project. On 13 June 2025 AFB, in partnership with Deloitte, held a roundtable with the PRA to discuss how to streamline data collection and reduce the cost of regulatory reporting. The PRA's summary of the roundtable can be read here.
- **Senior Managers & Certification Regime:** This Working Group was formed to consider the regulators' (FCA/PRA DP1/23) and HM Treasury's (CfE) review of the SM&CR. AFB responded to both the HMT CfE (here) and FCA/PRA DP1/23 (here). On 15 July, HM Treasury (here) as well as the PRA (here) and FCA (here), each launched consultations proposing legislative and regulatory changes to the SM&CR. The Working Group helped inform AFB's responses, which were submitted to HMT (here), the FCA (here) and the PRA (here) on 10 October 2025. On 22 April 2026, HMT (here), the FCA (here) and the PRA (here) published policy statements on intended reforms and changes to the SM&CR.
- **UK-EU Reset:** The Working Group was created to inform AFB's response (here) to the House of Lords European Affairs Committee Call for Evidence on the UK-EU reset, which was submitted in March 2025. AFB will monitor developments on the topic as the UK looks to reset relations with

the EU.

- **UK Immigration/Visa:** This Working Group discusses and provides feedback on proposals to change the UK Immigration/Visa system. It monitors the UK's approach to immigration, in particular following the publication of the Home Office's immigration white paper 'Restoring control over the immigration system' on 12 May 2025.
- **Client Categorisation and Conflicts of Interest:** This Working Group was formed to inform AFB's response to the FCA's CP25/36 - *Client categorisation and conflict of interest*, which was submitted in February 2026 (here).
- **Cyber Risk and Resilience:** This Working Group held a roundtable with the PRA and FCA in July 2026. The group will inform AFB's response to a consultation by the PRA/FCA on a proposed supervisory statement on cyber risk resilience. The consultation will be published in Q4 2026.

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