





CONTENTS

CHAIRMAN'S MESSAGE	5	OUR TASKS	12
FRANÇOIS VILLEROY DE GALHAU, Governor of the Banque de France, Chairman of the ACPR		2024 REVIEW	13
INTERVIEW WITH...	8	OUR KEY FIGURES	16
NATHALIE AUFAUVRE, Secretary General of the ACPR		OUR WORK PROGRAMME	18

1 • FINANCIAL SECTOR DEVELOPMENTS	20
1. New authorisations and changes to the overall structure of the population supervised by the ACPR	
2. Support for new participants and innovation	
2 • PRUDENTIAL SUPERVISION	30
1. Prudential oversight in 2024: priorities and main thematic initiatives	
2. Active involvement in efforts to adapt the regulatory framework and in international work	
3 • CUSTOMER PROTECTION	40
1. Supervisory priorities for 2024 relating to business practices	
2. Enhanced market guidance	
4 • ANTI-MONEY LAUNDERING AND COUNTER-TERRORIST FINANCING	46
1. Awareness raising and prevention	
2. Supervision	
3. Cooperation	
4. Administrative enforcement measures and individual sanctions	

5 • RESOLUTION **50**

1. In 2024, the ACPR continued its work to improve the resolvability of the banking sector, within the framework of the single resolution board's new strategy
2. A more in-depth national resolution framework for the insurance sector ahead of the European framework's entry into force in 2027
3. A second resolution planning cycle for central counterparties, with a focus on operational implementation of tools and international cooperation

6 • ACTIVITY OF THE SANCTIONS COMMITTEE **56**

1. Overview
2. Main takeaways from the 2024 rulings
3. Information about appeals against Sanctions Committee rulings

7 • SUSTAINABLE FINANCE AND CSR **60**

1. Supervision of climate risk and its implementation
2. CSR at the ACPR

8 • GOVERNANCE **66**

1. Decision-making bodies
2. General Secretariat

9 • BUDGET AND ACTIVITY MONITORING **78**

1. Budget of the ACPR
2. Activity and performance indicators

ACRONYMS **96**

ANNEXES **99**

Annex 1: Decisions taken by the Supervisory College concerning individual entities in 2024

Annex 2: List of decisions on general issues adopted in 2024
by the Supervisory College of the ACPR

Annex 3: CSR at the ACPR: collaborative and caring initiatives



CHAIRMAN'S MESSAGE

FRANÇOIS VILLEROY DE GALHAU
Governor of the Banque de France,
Chairman of the ACPR

Inflation cooled in 2024, despite the unstable economic and political environment. More favourable credit standards returned after European monetary policy was eased. Amid the risks, the French financial sector continued to show its strength and played its role in financing the economy to the full, as evidenced by the year-end upturn in lending volumes and sustained flows into life insurance. On the regulatory front, implementation of the final Basel III accord and adoption of the Solvency II Directive review bolstered the capacity of financial-sector participants to cope with shocks of varying sorts and sizes.

In a setting characterised by significant uncertainty, calling for redoubled vigilance and a high level of responsiveness, I would like to express my warmest thanks to all the staff of the ACPR. Day in, day out, they work tirelessly to perform the many tasks that safeguard the stability and strength of our financial system and protect the interests of customers.

1 • A MORE SUPPORTIVE INTEREST-RATE AND INFLATIONARY ENVIRONMENT IN 2024 UNDERPINNED THE HEALTH OF OUR FINANCIAL SECTOR

Earnings in the French financial sector increased in 2024 as more borrower-friendly macrofinancial conditions made a return. Lower interest rates paved the way for improved credit and financing conditions, which ultimately supported a pickup in the growth of outstanding loans at the end of the year. The decrease in interest rates also led to improved borrower solvency and helped to keep the cost of risk under control. Despite inching upwards, the share of non-performing loans at French banks remains at historically low levels. Meanwhile, milder inflation allowed insurance undertakings to reverse the deterioration in loss ratios observed in 2022 and 2023, while financial institutions as a whole were able to contain their operating costs.

The banking sector's results point to the structural strengths of the French model, which is based on two key factors: extensive use of fixed interest rates, which preserve the

repayment capacity of borrowers; and diversified business models. So although net interest margin was roughly unchanged, owing to the dominant role played by fixed rates, French banks reported increased net banking income thanks to the income (fees and earnings at subsidiaries) generated by their capital markets, insurance and asset management businesses.

Profitability in non-life insurance levelled out after the sharp deterioration observed in 2022-2023 during the inflationary shock.

In the life sector, the gradual normalisation of interest rates, coupled with the drawdown of reserves built up by insurers during the period of ultra-low rates, enabled life insurance contracts to maintain their appeal relative to other savings products, as reflected by the substantial net inflows into the sector in 2024, which was additionally driven by increased disposable income among retail investors.

In this environment, banks and insurance undertakings maintained elevated solvency and liquidity levels. The French banking sector had a ratio of Common Equity Tier 1 (CET1) to risk-weighted assets of 16% at end-2024, while liquidity levels were well above regulatory requirements. The insurance sector likewise continues to report solvency levels that far exceed capital requirements, with a solvency capital Requirement (SCR) ratio of close to 240%. The liquidity of assets held by insurers is also comfortable, as approximately 50% of investments may be easily and immediately converted to cash.


2 • A STRICT PRUDENTIAL FRAMEWORK AND SUPERVISION, IN A MORE TURBULENT INTERNATIONAL ENVIRONMENT

From a prudential perspective, a number of major regulatory projects were completed in 2024. Transposition of Basel III into European law was marked by the entry into force of the CRR3/CRD6 banking package, putting the final touches to a solid body of rules that will underpin the resilience of Europe's banking sector. Discussions are continuing on market risk requirements (FRTB implementation), with a view to ensuring equal treatment for European banks relative to their US and UK competitors. This robust regulatory framework is backed up by effective European supervision through the Single Supervisory Mechanism (SSM), which celebrated its tenth anniversary in 2024. In fact, the ACPR held a special event in June to commemorate the occasion. In the insurance sector, with the revised Solvency II Directive adopted and scheduled for implementation by 2027, it should be possible to recalibrate requirements to ensure that they are better tailored to risks, more proportional and conducive to the long-term financing of the economy.

There were also significant regulatory advances in 2024 in digital resilience, with preparations to implement the DORA Regulation on operational risk, the entry into force of the MiCA Regulation on crypto-assets and adoption of the AI Regulation. Regarding climate and environmental risks, surveys of banks and insurance undertakings revealed different levels of maturity among institutions, while also highlighting the significant progress made over the last two years.

Financial stability is now in a phase of regulatory stabilisation. We have reached a sufficient level of maturity and have gained enough distance to contemplate simplifying measures to make our prudential framework less complex and more understandable, and our supervision more efficient. However, simplification does not mean deregulation nor a relaxing of standards. We will not be drawn by US deregulation into a race to the bottom. We need to strike a balance that enables us to uphold our goal

of financial stability while also preserving the competitiveness of our financial sector.

After brightening for the financial sector, the cyclical and macrofinancial environment has darkened since the start of 2025 as a result of decisions by the new US administration, which has created considerable unpredictability with its trade threats and disregard for multilateralism. Although the challenges have increased, we still need to maintain constructive international collaboration. This new state of affairs adds cyclical uncertainty and magnifies longer-term structural risks, some of which are external – cyber, technological, climate – while others are connected with weaknesses within the financial system (non-bank intermediation, for instance). In a more fragmented world, initiatives such as the banking union and the savings and investment union come into their own, offering the means to secure Europe's financial sovereignty. The ACPR is resolved to play a full part in this journey! 



INTERVIEW WITH...

NATHALIE AUFAUVRE,
Secretary General of the ACPR

—What were some of the highlights for you in banking and insurance supervision in 2024?

N.A. Faced with a turbulent macrofinancial environment and persistent geopolitical uncertainty, French banks and insurers yet again demonstrated their resilience.

They continued to maintain solvency and liquidity ratios far exceeding regulatory requirements, and banks made the most of excellent access to market financing. Although resilient business models play an important part, the strength of the financial system also reflects the effectiveness of our supervision and regulatory adjustments to accommodate the changes taking place within the sector.

Against this backdrop, in 2024, the ACPR continued to assess proper asset/liability management by banks and insurers, particularly from the perspective of managing interest rate and liquidity risks, which have become more prevalent since 2022-2023. And speaking of these risks, we took part in work by the Basel Committee on best practices to consider following the banking turmoil of 2023. The ACPR continued to analyse business models and changes to these models, with the goal of measuring the capacity of financial institutions to adapt to a fast changing environment (macroeconomic conditions, technological developments, customer demand, fragmented value chain, etc.) but also their financial soundness, including in the medium term (profitability, liquidity, solvency, etc.). In this context, we paid special attention to the reinsurance market and to management fees (especially in health and life insurance). The ACPR closely monitored entities that were either in the process of being licensed or recently licensed (reinsurance captives, payment and electronic money institutions) to ensure that their development was on a sound and strong footing and that their risk management and internal control arrangements were commensurate with the institution's goals.

—In the face of the climate transition challenge, what were the findings of the second climate stress test?

N.A. Climate change risk management and a smooth transition to carbon neutrality remain central concerns for us. This year, we published the results of the second climate stress test for insurers – an exercise that involved much of the financial community. The short- and long-term findings reveal that insurers are exposed to sustainability risks, and we urge them to keep up their efforts to integrate these risks in their strategy, governance and internal models. The ACPR also continues to work to support development of the transition plans that are critical to determining the strategy adopted by financial institutions in response to climate challenges. Specifically, these plans should enable institutions to take action with a coherent overall strategy, milestones and indicators so that the entity itself and the supervisor can make sure that the plan is on track.

—On the topic of cyber risk, how have you prepared financial-sector participants for DORA's entry into force?

N.A. In response to the challenges of the digital transition, the rise in cyberattacks and growing use of outsourcing, it is vital to step up the supervision and prevention of cyber risk. In 2024, we provided the financial community with support and helped to get it ready for the entry into force in January 2025 of the DORA Regulation on the digital operational resilience of the financial system. The new regulation represents a significant advance for EU-wide supervision by setting rules for cybersecurity and IT risk management. It grants the ACPR new powers, including the power to supervise critical IT service providers. To take on its new tasks, the ACPR has made organisational changes and coordinates closely with all of the institutions involved in supervising the IT risk of financial entities.

—What did the ACPR do to nurture the innovation ecosystem in 2024?

N.A. A significant milestone was reached in 2024 in the implementation of Europe's digital finance roadmap, as the MiCA Regulation, which governs the use of crypto-assets, came into application. The ACPR also contributed to discussions on the regulation's follow-up, which is going to be addressed in a forthcoming report by the European Commission. In this context, an ACPR/AMF working group launched a consultation on the certification of smart contracts in decentralised finance. We also met with more than 100 innovators and organised our third Tech Sprint, which looked this year at the potential of large language models for the ACPR's activities.

—How would you sum up the year on the anti-money laundering and counter-terrorist financing (AML/CTF) front?

N.A. The AML/CTF legal framework is poised to undergo deep changes at the European level, mainly in connection with the AML package published in June 2024. The new package includes a section on requirements for supervised entities, and another on the establishment of the new European Anti-Money Laundering Authority (AMLA), which will be responsible for supervising the financial sector from an AML/CTF perspective and for coordinating Member States' financial intelligence units (FIUs).

In 2024, we looked specifically at the use of virtual IBANs, the rise of banking-as-a-service solutions and private banking. We paid particular attention to the laundering of fraud proceeds, including the accounts used to move the proceeds from scams or other fraudulent activities.

At the same time, we continued our supervisory activities, as we assessed or reassessed the risk profiles of 944 undertakings, which enabled us to determine our supervisory activities. We also conducted 37 on-site inspections.

—What were the main advances in 2024 in customer protection?

N.A. It was another busy year for customer protection. We worked hard to ensure that firms are operating in accordance with best practices. Our supervisory activities concentrated on solutions involving products that offer insufficient benefits to customers, such as affinity insurance products. We finalised our loan insurance review and kicked off discussions with the banking and insurance industries on initial measures that could help to rebalance and more effectively track value for money (VFM). The recommendation on the duty to provide advice in insurance was also updated to support insurers in connection with the entry into force of France's Green Industry Act and to ensure that the obligations to take account of customers' sustainability preferences are properly integrated.


—What were the main HR accomplishments?

N.A. Once again this year, many people applied to join the ACPR and we were delighted to welcome 116 wonderful new employees, which lifted our annual headcount to an average of 1,085 people, meaning that we hit our staffing cap. We are committed to offering a work environment in which everyone gets the chance to thrive and take advantage of opportunities for professional development. We continue to act in support of gender equality. In 2024, the ACPR workforce comprised 50.5% women and 49.5% men, and the share of managerial positions held by women rose from 43% in 2023 to 44% in 2024.

We made headway in our suptech approach, which is intended to harness new technologies to prepare the supervisory methods of the future and boost our supervisory capabilities. The introduction of new supervisory tools and the arrival of generative AI are prompting us to adapt constantly and try new things and, ultimately, represent a real opportunity to improve our efficiency.

—What are the priority work areas for 2025?

N.A. Strengthening the risk-based approach and simplification are at the heart of our regulatory work and supervisory activities. Besides supervising traditional risks, we are engaged in numerous workstreams connected with, for example, DORA's entry into force, ongoing work on climate risk, AML/CTF supervision of crypto-assets and disintermediated or decentralised finance. To better capture the risks linked to interconnectedness within the financial sector and especially with non-banks (NBFIs), the ACPR will team up with the Banque de France and the AMF to organise a system-wide stress test to assess the resilience of financial firms to severe market stress and to gain a clearer understanding of how risks spread between participants. This exploratory exercise does not have a regulatory goal in mind.

There is certainly no shortage of supervisory challenges. I would like to recognise the dedication and professionalism of the ACPR's employees as well as their ability to adapt and anticipate in response to the changing environment that we currently find ourselves in. 





ACPR AT A GLANCE

1,085 EMPLOYEES

FULL-TIME EQUIVALENT (FTE) ¹

PUBLIC INTEREST TASKS

PRUDENTIAL SUPERVISION	<ul style="list-style-type: none">→ Prudential oversight of the banking and insurance sectors in France→ Authorisation of new participants and activities
CUSTOMER PROTECTION	<ul style="list-style-type: none">→ Supervision of business practices relating to the sale of banking and insurance products
ANTI-MONEY LAUNDERING AND COUNTER-TERRORIST FINANCING (AML/CTF)	<ul style="list-style-type: none">→ Supervision of the compliance and effectiveness of AML/CTF systems at financial institutions, including crypto-asset service providers (CASPs)
CRISIS PREVENTION AND RESOLUTION IN THE BANKING AND INSURANCE SECTORS	
CONTRIBUTION TO FINANCIAL STABILITY	<ul style="list-style-type: none">→ Macroprudential analyses of financial sectors→ Contributions to rulemaking in the financial sector

Since the European banking union was set up in 2014, the ACPR has discharged its banking related prudential responsibilities within the framework of the Single Supervisory Mechanism (SSM) and the Single Resolution Mechanism (SRM).

¹ On an average annual basis.

2024 REVIEW

A RESILIENT FINANCIAL SECTOR SUPPORTED BY STRONG SUPERVISION

___In 2024, banks and insurers demonstrated resilience against a backdrop of economic and political uncertainty. Their strength reflected the effectiveness of the prudential framework and of our supervisory model, which is built around active and intrusive supervision that prioritises a risk-based approach. In a macroeconomic environment featuring multiple risks, 2024 was a pivotal year in which inflation eased and interest rates started coming down. The changes needed to secure the stability of the financial sector were widely discussed, while extensive work was done on managing climate and cyber risks, and on adapting supervision to the rise of non-banks. A number of significant regulatory milestones were also achieved. •

BANKING SUPERVISION

- Transposition of the final Basel III Accord into European law.
- Contribution to the European Commission's public consultation on relaunching securitisation.
- Work by the Basel Committee on the follow-up to the banking turmoil of 2023,² especially in terms of interest rate risk and liquidity risk.
- Participation in establishing Basel guidelines for managing counterparty credit risk associated with non-banks.
- Entry into force of MiCA, creating a new supervisory framework for crypto-asset service providers (CASP).

INSURANCE SUPERVISION

- Finalisation and adoption of the Solvency II Directive review.
- Finalisation and adoption of the insurance capital standard (ICS) developed by the International Association of Insurance Supervisors (IAIS).
- Contribution to drafting EIOPA's opinion on the supervision of reinsurance captives and publication of a guide for commercial enterprises planning to set up a captive.
- Industry survey of recent reinsurance trends, at a time of significant climate and environmental challenges.

CYBER RISK

- ACPR preparations and support for the financial community in readiness for DORA's entry into force.
- Participation in a cybercrisis simulation exercise organised by G7 financial authorities.
- Contribution to the Single Supervisory Mechanism's cyberstress test.

CLIMATE RISK

- Publication of the findings of the second climate stress test for insurance undertakings.
- Publication of two thematic reviews on the integration of sustainability risks in strategy, governance and risk management (by insurers and reinsurers, and by less significant credit institutions³ and specialised institutions respectively).
- Continuation of work to create a framework for nature-related financial risks within the Network for Greening the Financial System (NGFS).

² Regional bank failures in the United States and Crédit Suisse's takeover by UBS.

³ Less Significant Institutions as defined by the SSM.

PROTECTION OF BANKING AND INSURANCE CUSTOMERS

- Update of the recommendation on gathering customer information to discharge the duty to provide advice in insurance.
- Finalisation of the loan insurance review and discussions with banking and insurance professionals.
- Execution of:
 - a mystery shopping campaign targeting the distribution of mobile phone insurance products;
 - inspections targeting the marketing of funeral insurance solutions and compliance with obligations relating to inactive accounts and safe-deposit boxes.

AML/CTF

- Work related to the adoption in June 2024 of the AML6 package, which enhanced the requirements placed on supervised entities; involvement in setting up the new European Anti-Money Laundering Authority (AMLA).
- Analysis of market trends and associated risks: virtual IBANs, banking-as-a-service solutions, use of accounts to move and launder the proceeds of fraud, specific issues related to market activities, and more.

CRISIS PREVENTION AND RESOLUTION

- Participation in European work on operational planning for the management of banking crises.
- Execution with the Single Resolution Board (SRB) of exercises at two French banking institutions to test their capacity to cope with a major crisis leading to entry into resolution.
- Publication of a working paper on combining transfer and bail-in mechanisms at large banks.
- Preparation of the national resolution framework for the insurance sector with a view to transposition of the Insurance Recovery and Resolution Directive (IRRD), which is scheduled to enter into force in 2027.

FINTech-INNOVATION

- Organisation of the third annual Tech Sprint, which explored the potential of large language models for the ACPR's activities, and the Fintech Forum.
- Input to discussions with a view to adoption of the European Regulation on Artificial intelligence (Trustworthy AI).
- Continuation of work on creating a framework for decentralised finance, with a particular focus on certifying smart contracts.

OUR KEY FIGURES 2024

UNDERTAKINGS SUPERVISED

BANKS

657

INSURERS AND REINSURERS

639

65,000

INTERMEDIARIES SUBJECT TO INSPECTIONS OF BUSINESS PRACTICES

including **29,000** intermediaries covered
by AML/CTF inspections⁴

⁴ Intermediaries subject to AML/CTF supervision, in accordance with Art. L. 561-2 of the Monetary and Financial Code, include:

- intermediaries in banking transactions and payment services mentioned in Article L. 519-1 where they are acting under a mandate from a customer and are entrusted with funds as the parties' agent;
- insurance intermediaries defined in Article L. 511-1 of the Insurance Code, except those acting under the entire responsibility of the undertaking or the insurance broker.

Banks and insurers are also subject to AML/CTF supervision.

ACTIVITIES

245

Licensing and
authorisation decisions

88

on-site inspections
relating to prudential
supervision

91

on-site inspections
relating to business
practices

35

on-site inspections
relating to AML/CTF

147

meetings with innovators

3

sanctions imposed
by the Sanctions
Committee

4

resolution plans
adopted

OUR WORK PROGRAMME

The ACPR's 2025 work programme, which was approved by the Supervisory College, has four main focus areas:

1 MONITOR THE DEVELOPMENT OF RISKS TO ENSURE A SOUND FINANCIAL SECTOR IN AN UNCERTAIN POLITICAL, ECONOMIC AND FINANCIAL ENVIRONMENT

- Focus on the risks of macrofinancial contagion, at a time of market volatility and heightened geopolitical risk;
- Pay attention to the net interest margin of French banks, as a function of interest rate developments;
- Monitor risks (including credit risk) amid rising debt levels and corporate bankruptcies;
- Work with the Banque de France and the AMF to assess risks linked to interconnectedness within the financial sector, especially with the non-bank financial intermediation (NBFi) sector.

2 DEVELOP OUR RISK-BASED APPROACH AND CONTRIBUTE TO SIMPLIFYING SUPERVISION AND REGULATION

- Adjust inspections based on supervisory priorities, institutions' risk profiles and the impact of failures;
- Innovate in support of supervisory tools and data quality;
- Finalise regulatory workstreams and promote measures to simplify Europe's regulatory framework.

3 SUPPORT THE SECTOR AND WORK PROACTIVELY TO REDUCE STRUCTURAL VULNERABILITIES

- Support participants to implement CRD6/CRR3 and Solvency II; monitor Basel III application outside the EU;
- Pursue activities aimed at developing transition plans, contribute to European work on regular climate stress testing and control climate and environmental (ESG) risks;
- Resilience and performance of institutions' business models (conglomerates, insurance outsourcing, etc.), in a setting of increasing digitalisation;
- Specific risks linked to the digital transition (cyber, AI) and introduction of DORA.

4 STRENGTHEN ANTI-MONEY LAUNDERING AND COUNTER-TERRORIST FINANCING (AML/CTF) SYSTEMS AND IMPROVE THE QUALITY OF BUSINESS PRACTICES

- Participate in setting up the new European Anti-Money Laundering Authority (AMLA) and the European supervisory model;
- Supervise AML/CTF systems and deploy risk-based supervision, especially in the crypto-asset sector and in disintermediated finance;
- Make sure that the interests of customers and policyholders are protected and upheld.

The Resolution College identified and adopted three key priorities:

- 1 BE PART OF THE SINGLE RESOLUTION BOARD'S 2028 STRATEGY;
- 2 BOLSTER THE ACPR'S EXPERTISE IN INSURANCE RESOLUTION;
- 3 PURSUE THE STRATEGY AIMED AT EXERTING INFLUENCE.



1

FINANCIAL SECTOR DEVELOPMENTS

245

LICENSING AND AUTHORISATION
DECISIONS

639

INSURERS AND REINSURERS

657

BANKS

147

MEETINGS WITH INNOVATORS

1. NEW AUTHORISATIONS AND CHANGES TO THE OVERALL STRUCTURE OF THE POPULATION SUPERVISED BY THE ACPR

1.1 INSURANCE SECTOR

The number of undertakings licensed in the insurance sector fell overall in 2024 due to the decrease in the number of mutual insurers. Five new reinsurance captives were also licenced over the course of the year.⁵

The other licences issued concerned the following undertakings:

- Insurem SA, which took over the business of Malta-based Insurem Ltd, which had previously operated in France under the freedom to provide services (FPS);
- Société mutuelle d'assurance de Bourgogne (SMAB), a mutual insurer that took over the entire business of UniRé Assurances, a union of mutual insurers, and its three members, through a total portfolio transfer;
- 157 RE 25, a sub-fund of a securitisation fund (FCT) bearing insurance risks for CCR RE.

The 42 mergers or portfolio transfers authorised in 2024 resulted in 11 licences lapsing while nine risk transfer agreements were terminated.

Authorisations for significant ownership changes included the sale of Neuflyze Vie by ABN Amro and Axa to BNP Paribas Cardif and the acquisition by CNP Assurances of a 65% stake in LMG Assurances.

The ACPR also took:

- 768 decisions concerning new appointments and reappointments of effective managers and key function holders in the insurance sector;
- 211 decisions on European passports enabling French institutions to do business in other European Economic Area countries. The ACPR also received 119 notifications enabling EEA institutions to do business in France.

1.2 BANKING SECTOR⁶

The number of licensed institutions in the banking sector was roughly unchanged in 2024.

Decisions in 2024 included:


- issuance of licences to two electronic money institutions, Société Générale – Forge and Circle Internet Financial Europe, which issue EUR- and USD-backed electronic money tokens⁷ on blockchains and which have been subject to the provisions of the European Markets in Crypto-Assets (MiCA) Regulation since 1 July 2024;
- Société de Bourse Gilbert Dupont was licensed as a credit and investment institution, in accordance with the supervisory framework applicable to investment firms. Its licence was issued by the ECB, based on a proposal by the ACPR following a joint review;
- BSG France SA was licensed as a Class 2 investment firm. The result of a partnership between Société Générale and AllianceBernstein, a major US asset manager, this international project entailed significant review work, which was done in conjunction with the AMF;
- licences were issued to eight credit servicers that were already operating on the French market following the transposition of Directive (EU) 2021/2167 on credit servicers and credit purchasers.
- Ownership changes, including the takeover of Younited, a credit institution, by US private equity fund Ripplewood, in partnership with institutional investors and family offices. The acquisition of capital stakes by the new shareholders is intended to finance business growth at the bank, which specialises in consumer lending.

⁵ See box on reinsurance captives. A reinsurance captive is a non-financial corporation that is not owned by an insurance undertaking and whose purpose is to provide reinsurance coverage exclusively for the risks of the company or companies to which it belongs, or the risks of one or several other companies in the group to which it belongs.

⁶ Credit institutions, financing companies, investment firms, payment institutions, electronic money institutions, credit servicers.

⁷ See box on licensing the first electronic money token issuers.

The ACPR also took:

- 1,632 decisions concerning appointments/renewals of appointments of effective managers and members of supervisory bodies, of which 147 were the subject of an ECB decision following an ACPR review;
- 913 decisions on European passports enabling French institutions to do business in other EEA countries, and, conversely, allowing EEA institutions to operate in France;
- 4,922 decisions authorising the agents of payment service providers, 1,414 of which concerned agents in other EEA countries. 

SUMMARY OF ACPR LICENSING AND AUTHORISATION DECISIONS

	Total	Insurance	Banking
Granting of licences, authorisations and registrations	33	8	25
Licence extensions	12	4	8
Waivers and exemptions from licensing and authorisation requirements	9	0	9
Amendments to licences and authorisations	8	3	5
Withdrawals of licences and authorisations	27	13	14
Risk transfer agreements	10	10	/
Administrative changes	22	6	16
Changes in ownership	57	31	26
Mergers, demergers and/or portfolio transfers	42	42	/
Other	25	3	22
Total number of decisions	245	120	125

Number of times assent was given to the AMF for applications to register digital asset service providers (DASPs) ¹

15

Number of times assent was given to the AMF for applications to license crowdfunding service providers (CSPs) specialising in full or in part in loan intermediation ²

5

¹ DASPs are registered with the AMF once the ACPR has given its assent (new framework for CASPs: see 2.2. Supporting innovation in finance: regulatory challenges).

² CSPs specialising in full or in part in loan intermediation are licensed by the AMF once the ACPR has given its assent.



Reinsurance captives

A reinsurance captive is a non-financial corporation that is not owned by an insurance undertaking and whose purpose is to provide reinsurance coverage exclusively for the risks of the company or companies to which it belongs, or the risks of one or several other companies in the group to which it belongs. For the industrial and commercial groups that own shares in them, reinsurance captives offer a valuable instrument to analyse and control risks. By means of a reinsurance treaty, captives take on a portion of the risks borne by the insurers in their group, so that the associated costs can be managed more efficiently.

The ACPR licensed five new reinsurance captives in 2024 (La Poste, Chantiers de l'Atlantique, Orange, Safran and Lucien Barrière Groups), bringing the total number of captives licensed in France to 19.

Several new projects are currently under discussion with the ACPR for 2025. To help in the preparation of these projects, the ACPR published an information guide in November 2024 setting out the main regulatory and prudential principles to obey to obtain a licence, as well as best practices in this area.⁸ •

⁸ [Publication of an information guide on reinsurance captives on the ACPR's website.](#)



Licensing the first electronic money token issuers

The provisions of Europe's Markets in Crypto-Assets (MiCA) Regulation relating to

- electronic money tokens and asset-referenced tokens came into application on 30 June 2024⁹,
- other sections of the regulation entered into application on 30 December 2024. A new framework for issuers of other crypto-assets and crypto-asset service providers (CASPs) has replaced the framework covering digital asset service providers (DASPs). This will enable CASPs to market their services throughout the European Union. The AMF is in charge of authorising and supervising these service providers, but the ACPR is totally responsible for AML/CTF aspects.

The regulation was transposed into French law by an ordinance dated 15 October 2024, which specifies, among other things, the respective powers of the two authorities.

Stablecoins are crypto-assets that seek to maintain a stable value with reference to a currency, or another security more generally, or to a basket of currencies or other securities. These include electronic money tokens (EMTs), which may be backed by a single currency, such as the euro or the US dollar, as well as asset-referenced tokens (ARTs), whose value may be pegged to the gold price, for example, or to a basket of currencies. EMT issuers must have electronic money institution (EMI) or credit institution (CI) status and must submit a white paper to the ACPR for each token issued.

Two firms were licensed in France as EMIs on 1 July 2024 with a view to issuing EMTs in compliance with MiCA. Since 30 December 2024, non-compliant tokens may no longer be offered to the public in the EU or admitted to trading with a CASP. •

⁹ See box on licensing the first electronic money token issuers.

SUMMARY OF INSTITUTIONS AUTHORISED TO DO BUSINESS IN FRANCE

INSURANCE SECTOR	31/12/2023	31/12/2024	Change 2023/2024
Insurance Code	302	301	-1
Insurance companies	254	248	-6
Funds for supplementary occupational retirement provision	21	21	0
Reinsurance companies	23	28	5
Non-EU country branches	4	4	0
Social Security Code	34	33	-1
Provident institutions	33	32	-1
Undertakings for supplementary occupational retirement provision	1	1	0
Mutual Insurance Code	324	305	-19
Mutual insurers governed by Book II and not backed by larger partners	249	239	-10
Mutual insurers for supplementary occupational retirement provision	1	1	0
Mutual reinsurers	2	2	0
Mutual insurers governed by Book II and backed by larger partners	72	63	-9
TOTAL LICENSED UNDERTAKINGS AND UNDERTAKINGS NOT REQUIRING A LICENCE	660	639	-21

INSURANCE AND BANKING SECTORS	31/12/2023	31/12/2024	Change 2023/2024
Branches of EEA institutions operating under the freedom of establishment	179	180	1
Branches of insurance undertakings	57	58	1
Branches of credit institutions	70	70	0
Branches of investment firms	31	32	1
Branches of payment institutions and electronic money institutions	21	20	-1

BANKING SECTOR	31/12/2023	31/12/2024	Change 2023/2024
Credit institutions	331	327	-4
Credit institutions licensed in France	313	310	-3
Institutions licensed for all banking activities	239	234	-5
Banks	144	141	-3
o/w branches of institutions with registered offices in non-EU countries	23	24	1
Mutual and cooperative banks	77	76	-1
Municipal credit banks	18	17	-1
Specialised credit institutions (formally financial companies or specialised financial institutions until end-2013)	70	70	0
Credit and investment institutions	4	6	2
Credit institutions licensed in Monaco	18	17	-1
Investment firms	98	98	0
o/w branches of institutions with registered offices in non-EU countries	1	1	0
Financing companies	144	142	-2
Financing companies	125	124	-1
o/w mutual guarantee companies	37	37	0
Dual status: financing companies and investment firms	2	1	-1
Dual status: financing companies and payment institutions	15	15	0
Dual status: financing companies and electronic money institutions	2	2	0
Payment institutions	55	58	3
Account information service providers	10	10	0
Electronic money institutions	19	22	3
TOTAL LICENSED BANKING INSTITUTIONS	657	657	0
Third-party financing companies	5	5	0
Money changers	209	221	12
Credit servicers	/	8	8
TOTAL OTHER INSTITUTIONS AUTHORISED BY THE ACPR	214	234	20

2. SUPPORT FOR NEW PARTICIPANTS AND INNOVATION

The ACPR supports innovators, monitors market transformations linked to new technologies, and contributes through its work to maintaining oversight that is adapted to the changes taking place in the sector.

2.1 WORKING AND DIALOGUING WITH INNOVATORS

At end-2021, the ACPR adopted a fintech charter¹⁰ to improve the way that it deals with innovators. The charter specifies the stages of the authorisation procedure, describes the ACPR's deadline commitments and sets out the authority's expectations for innovators. If an innovator is looking for an initial opinion on their project or guidance on the authorisation process, they can reach out to the Fintech-Innovation Unit, which is the ACPR's gateway for fintechs.¹¹ The unit was in contact with 100 new innovators in 2024, compared with 89 in 2023, and provided an initial response within two weeks in 95% of cases. Thereafter, once an application was submitted to the ACPR's authorisations departments, the average response time was 9.5 days.

The Fintech-Innovation Unit also spearheads the ACPR-AMF Fintech Forum, in partnership with the AMF. The annual day-long event, held this year on 14 October 2024, provided an opportunity to get members of the fintech ecosystem and supervisory authorities together to talk about major themes, such as artificial intelligence and the European Commission's digital finance strategy. The Forum also featured teaching workshops spanning a variety of regulatory topics, including MiCA and DORA implementation, payment regulations, and AML/CTF aspects. The ACPR conference on 26 November 2024, entitled "The financial sector innovates, supervision evolves", was another highlight in the authority's dialogue with the Paris financial centre around innovation and its operational and regulatory challenges.

The ACPR's Fintech-Innovation Unit also plays an active part in dialogue between authorities at national and European level, as well as in international bodies, such as the International Association of Insurance Supervisors (IAIS) and the Bank for International Settlements (BIS). As such, it provides input to the work of the European Central Bank (ECB), the European Banking Authority (EBA), the European Insurance and Occupational

Pensions Authority (EIOPA) and the European Forum for Innovation Facilitators (EFIF), which is coordinated by the European authorities.

2.2 SUPPORTING INNOVATION IN FINANCE: REGULATORY CHALLENGES

A significant milestone was reached in 2024 in the implementation of Europe's digital finance roadmap.

The MiCA Regulation, which governs the use of crypto-assets, came into application (see box on licensing the first electronic money token issuers).

Besides doing work to implement the regulation, the ACPR also contributed to discussions on the follow-up to MiCA, which is going to be covered by a forthcoming report by the European Commission. It was notably in this context that the ACPR proposed rules for decentralised finance and the certification of smart contracts¹² that provide or help to provide DeFi services.

The DORA Regulation on digital operational resilience, which came into application on 17 January 2025, was also the topic of a considerable amount of preparatory work and communication with the financial community.

The bulk of Europe's new cross-sector regulation on artificial intelligence¹³, which was adopted on 13 June 2024, will come into application in August 2026. Designed according to a product safety rationale, the regulation has two goals: address risks to the safety, health and fundamental rights of citizens and create a single European "trustworthy AI" market. Two categories of AI systems in the financial sector are treated as high risk by the regulation: banking systems to assess the solvency of individuals; and the systems used in life and health insurance to assess risks and set pricing for individuals.

The regulation provides that, unless stipulated otherwise by domestic requirements, the national authority for prudential supervision shall act as the market surveillance authority for AI systems linked to the provision of financial services. The ACPR could therefore be appointed as the market surveillance authority.

Finally, negotiations continued in 2024 on the legislative proposal on financial data access (FIDA). The proposal aims to promote the development of "open finance" by, among other things, defining the rights and obligations of companies that hold and use data,

in order to facilitate the sharing and reuse of data while providing a secure framework for customers.

2.3 PREPARING THE SUPERVISORY METHODS OF THE FUTURE

For some years, the ACPR has been engaged in a Suptech ¹⁴ approach aimed at harnessing new technologies to boost the authority's supervisory capabilities. As a second series of trials concluded with the introduction of new supervisory tools, the arrival of generative AI prompted the ACPR to renew its roadmap.

As part of this, from 27 to 29 February 2024, the ACPR organised its third annual Tech Sprint ¹⁵, which this year explored the potential of large language models for the ACPR's activities. Participants, who included data scientists, students and specialist engineers, were invited to work over three days, with input from ACPR staff, to develop a prototype for an innovative tool based on a realistic use case tailored to the authority's business needs.

Following the event, the ACPR selected the most relevant use cases for longer-term development. The first tools under development (mapping of life insurance unit-linked products based on the specifications described in key information documents, comparison of legal provisions) cover non-confidential data. ●

¹⁰ See [Fintech Journey](#) page on the ACPR's website.

¹¹ The term "fintech" means technological innovation in financial services. By extension, the term is also used to refer to new financial participants, especially in lending, payments, tokenisation and crypto-assets, financial product distribution and savings management, whose business models are derived from these technological innovations.

¹² Smart contracts are programmes deployed on a blockchain that execute automatically when predefined trigger events occur. By facilitating, verifying or executing transactions on the blockchain, they enable the delivery of decentralised finance (DeFi) services.

¹³ See [Regulation \(EU\) 2024/1689](#) on the eur-lex website.

¹⁴ English portmanteau of "supervisory technology" and referring to the use of new technologies in supervision.

¹⁵ A Tech Sprint organised by supervisory authorities means a hackathon around a regulatory or supervision-related theme.



A working group on the certification of smart contracts ¹⁶

Following their work on decentralised finance (DeFi) ¹⁷, the ACPR and the AMF set up a working group led by the ACPR-AMF Fintech Forum to explore the question of certification for smart contracts as a possible element in future DeFi rules. DeFi services are delivered in a decentralised manner via smart contracts. A mechanism that strengthens their security and governance would help to make DeFi services safer and lower the risks for users.

The working group, made up of representatives from the crypto-assets sector, technical experts and affected authorities, met 11 times in 2024 and looked at three themes:

1. existing and potential **certification standards**;
2. potential **audit methods** and bodies or resources that could be involved in implementing them;
3. ways in which **the rules** could incorporate a certification mechanism and practical implementation issues.

A **report** summarising the group's work will be published and put out to consultation in 2025. •



AI Regulation: preparations at the ACPR

The ACPR is getting ready to perform a new surveillance role under the AI Regulation, should it be named as the competent authority. This will be done in accordance with the following principles:

- it will be required to put in place "market surveillance" to identify AI systems that could raise compliance issues;
- to do this, it will adopt a risk-based approach to ensure that the resources implemented are proportionate to the expected results;
- and it will harness synergies with prudential oversight as much as possible.

Preparatory work in 2025 will cover four areas: legal questions (in conjunction with European authorities), methodological issues, national and European coordination and, finally, matters of internal organisation (including specialist HR requirements). This work will also include discussions with the financial sector covering technical and regulatory issues. •

¹⁶ Smart contracts are programmes deployed on a blockchain that execute automatically when predefined trigger events occur. By facilitating, verifying or executing transactions on the blockchain, they enable the delivery of decentralised finance (DeFi) services.

¹⁷ "Finance décentralisée ou désintermédiée (DeFi): quelle réponse réglementaire?" (ACPR discussion paper, April 2023), "AMF Discussion Paper on Decentralised Finance (DeFi)", June 2023. Decentralised or disintermediated finance (DeFi) refers to a set of crypto-asset services that are comparable to financial services but performed without the involvement of an intermediary. DeFi is generally characterised, at least in theory, by the use of public blockchains, protocols based on smart contracts, decentralised governance arrangements and the absence of depositories.



2

PRUDENTIAL SUPERVISION

88

ON-SITE INSPECTIONS
RELATING TO PRUDENTIAL SUPERVISION

15

MEETINGS ATTENDED
OF DECISION-MAKING BODIES
OF EUROPEAN SUPERVISORY AUTHORITIES

14

MEETINGS OF THE ECB'S
PRUDENTIAL SUPERVISORY BOARD

11

ANALYSES ET SYNTHÈSES
REPORTS PUBLISHED

4

FORMAL NOTICES

Prudential supervision is performed on an ongoing basis. It aims to ensure that banking and insurance undertakings supervised by the ACPR are in a sufficiently sound financial position, especially in terms of their liquidity and solvency, and that they are operating in accordance with applicable provisions and in a way that does not threaten their position (quality of governance, internal control, risk management).

The ACPR's supervisory teams use various tools, such as reporting, interviews, thematic studies and on-site inspections, to analyse the risk profile of each undertaking and group and thereby determine the appropriate supervisory measures, address identified areas of vulnerability and improve firms' practices, where necessary. These core activities are guided by annually revised priorities.

1. PRUDENTIAL OVERSIGHT IN 2024: PRIORITIES AND MAIN THEMATIC INITIATIVES

1.1 INSURANCE SECTOR

1.1.1 Impact of the economic environment on the insurance sector

Insurers maintained high levels of solvency and liquidity in 2024. Undertakings continue to hold capital well in excess of requirements, with a solvency capital requirement coverage ratio of close to 240%, despite the slight rise in medium- and long-term risk-free rates. Assets also remain highly liquid as approximately 50% of investments may be easily and immediately converted to cash. Around 80% of the bonds held by insurers are rated A- or better, while the share of bonds with a rating lower than BBB- is just 1% or so.

Buoyed by the increase in disposable income and the household saving ratio, life insurance reported extremely brisk inflows in 2024. The rates paid by insurers on the non-unit-linked portions of individual contracts have been climbing since 2021 (2.6% on average in 2023), making it possible to contain surrenders. Until 2022, in the low rate environment, as returns on non-unit-linked products dwindled, insurers promoted investments in unit-linked products, which offer potentially more attractive returns, but policyholders must bear a greater

share of the risk in return. In 2023, with the increase in interest rates, some bank products, such as fixed-term deposits or regulated savings solutions, drew a portion of savings. In addition, the increased cost of housing loans may have prompted households to draw on their life insurance savings to fund real estate purchases. As interest rates gradually normalised in 2024, life insurance enjoyed renewed appeal.

Moreover, following a pronounced deterioration in 2022 linked in particular to the inflationary shock, profitability in the non-life insurance sector has plateaued since 2023 at below pre-shock levels. This reflects two simultaneous and countervailing effects:

- the increase in premiums paid for individual insurance services reached a high level in 2024, after being significantly below overall inflation in 2022 and 2023;
- but the cost of automotive spare parts, home repair services, reinsurance and climate catastrophes rose sharply, due to insurance's inverted cycle, in which premiums are earned before claims arise.

Inflation in the costs borne by insurers could also have longer-term effects for products offering multi-year coverage or whose claims are settled over long periods, such as construction, liability and death & disability insurance.

1.1.2 Enhanced monitoring of insurance activities exposed to the interest rate and inflationary environment

The inflationary environment prompted ACPR teams to conduct targeted activities on the health insurance and reinsurance markets, where premiums have risen recently, as well as in life insurance, owing to its sensitivity to economic conditions.

In health insurance, with underwriting income contracting despite an increase in premiums, the ACPR conducted a study on management fees borne in 2023 by supplementary health insurance undertakings (OCAMs) in respect of health coverage. The aim was to analyse fee components and the financial flows linked to outsourced activities. The study found in particular that mutual insurers operating essentially in the health segment and provident institutions offering health and death & disability coverage are subject to similar levels of fees for the various risks to which they are exposed. Conversely, in the case of insurance undertakings offering a broader product range, the fee ratio is lower in health than in other activities,

whose claims management cost is much higher. Fee ratios for individual contracts are higher than those for group contracts. Compared with other undertakings, undertakings subject to the Insurance Code employ outsourcing more extensively for some or all of their health business.

In reinsurance, the catastrophic events of recent years due in large part to climate change worldwide and riots in France, coupled with inflation and higher interest rates, pushed up reinsurance prices and spurred changes to coverage offered to ceding insurers. This was true to some extent in 2023 and even more so in 2024, with changes to deductibles and even to the scope of coverage. In this environment, the ACPR made reinsurance one of its supervisory priorities for 2024. It carried out a cross-cutting survey of the industry via two questionnaires, one for reinsurers operating in France, which elicited a dozen responses, and a symmetrically constructed survey for cedents, whose participation ensured coverage of the entire market.

In France, insurers cede a large portion of “high-intensity” risks ¹⁸ via a specific mechanism. Natural catastrophes are dealt with through a public-private partnership steered by *Caisse Centrale de Réassurance* (CCR – French central reinsurance fund), which is backed by a State guarantee of last resort. This mechanism has largely absorbed the cost of claims linked to high-intensity catastrophes in recent years. Besides the regulatory regime operated by the CCR, most catastrophic-risk reinsurers on the French market are international firms.

According to the ACPR’s 2024 survey, ceding insurers were affected by changes to reinsurance terms: increased deductibles (also called “priorities”) made earnings more volatile, while higher prices had an immediate impact on net underwriting income. However, when reinsurers and cedents are considered together, these changes did not prevent the market from covering all risks.

In life insurance, inspection teams paid close attention to ensure that undertakings’ models captured surrender risk properly, since higher interest rates could boost cyclical surrenders with a view to investing in competing savings products, thereby challenging the way the models were calibrated during the low interest rate period. The ACPR therefore carried out a cross-cutting survey in 2024 on surrender modelling at 56 life insurance undertakings. The survey also checked the

consistency of surrender modelling for the purpose of assessing insurance commitments (best estimate), capital requirements (solvency capital requirement) and risk management, for example under ORSA assessments.¹⁹

In addition, the ACPR conducted several on-site inspections to check the appropriateness of surrender modelling. The swift change in interest rates in 2022-2023 underlined the need to use prudent assumptions when modelling policyholder behaviour and assessing commitments, and to not shy away from drawing comparisons against experience. Moreover, although modelling cyclical surrenders is a complex exercise, this should not mean that technical provisions are underestimated or that their measurement is less well justified and documented. The ACPR will pay attention to the documentation provided for assumptions, checking to ensure that assumptions are realistic and consistent, whether at the level of each undertaking or across comparable undertakings.

1.2 BANKING SECTOR

Within the framework of the Single Supervisory Mechanism (SSM), Joint Supervisory Teams (JSTs) supervise France’s 12 ²⁰ major banking groups, or significant institutions (SIs), which are directly supervised by the ECB. JSTs are made up of staff supplied by the ECB, the ACPR and the other national authorities of countries where these groups do business. ACPR staff are additionally involved in the work of four other JSTs in charge of supervising European SIs operating in France.

The ACPR also supervises 91 less significant institutions (LSIs) ²¹ that are subject to indirect supervision by the ECB, which is working to harmonise the practices of national authorities.

The ACPR also supervises institutions that are not part of the SSM:

- specialised institutions, including financing companies, non-EU country branches, investment firms, payment institutions, electronic money institutions, account information service providers and credit servicers;
- the two parts of the Caisse des Dépôts et Consignations (CDC), namely the Central Sector, which acts as the lead institution of the CDC group, and the ring-fenced Savings Funds, which hold much of France’s regulated savings. Consistent with its public interest tasks and special status, the CDC is covered by specific supervision similar to that applied to large institutions.

1.2.1 A sector that has shown resilience to upheaval and developments in the interest rate environment

The ACPR conducted its prudential supervisory activities in 2024 against a backdrop featuring uncertainties stoked by mounting geopolitical tensions and changes in the interest rate environment. In this setting, the strength of the banking sector is a factor of resilience ²².

French banks rely on diversified business models

French banks saw their net banking income increase, driven by fees and income from market activities, whereas net interest margin was more or less unchanged. Operating expenses remained contained and the increase in the cost of risk was kept under control, enabling net income to rise slightly.

While credit risk increased in 2024, it remains under control

Credit risk in the portfolio of non-financial corporations (NFCs) rose slightly in 2024. The share of non-performing loans (NPLs) at French banks was close to record low levels, although it inched up slightly, particularly reflecting the downturn in the financial situation of small and medium-sized enterprises (SMEs). The NFC NPL provisioning coverage ratio remains satisfactory and above that recorded among European peers.

Regarding institutions under its direct supervision, in 2024 the ACPR conducted enhanced monitoring of strategies for managing and reducing non-performing exposures and analysed the coverage ratio of these exposures.

Liquidity and solvency fundamentals remain sound

In 2024, the main French banking groups maintained liquidity ratios that were significantly above regulatory requirements and also continued to enjoy satisfactory access to market financing. The sector's average liquidity coverage ratio (LCR) remains close to 150%, while the net stable funding ratio (NSFR) is 115%.

The ACPR continued its work monitoring the liquidity risk of institutions under its direct supervision, which included a review of refinancing plans and internal liquidity adequacy assessment processes (ILAAPs). In some instances, this led to the introduction of specific liquidity requirements.

The resilience of French banks is further underpinned by strong own funds ratios. The Common Equity Tier 1 (CET1) ratio is 16%, while the CET1 margin is capable of absorbing the increased requirements introduced in 2024 as well as those linked to European transposition of the Basel III framework in 2025.

As regards entities under its direct supervision, in 2024 the ACPR conducted its first Pillar 2 campaign (which involved formulating supplementary capital requirements and recommendations) under Investment Firms Regulation/Investment Firms Directive (IFR/IFD) rules.²³ The campaign was conducted in addition to those covering credit institutions (notably LSIs), financing companies and payment and electronic money institutions.

The ACPR also organised several marketwide gatherings in 2024 so that it could present its supervisory priorities and set out its expectations in terms of data quality for institutions under its direct supervision and also in terms of the protection of customer funds for payment institutions, electronic money institutions and investment firms.

¹⁸ Risks representing high per-claim losses, as opposed to high-frequency or mass risks.

¹⁹ Own Risk and Solvency Assessment.

²⁰ Bank of America Securities Europe, BNP Paribas, BPCE, Bpifrance, Confédération Nationale du Crédit Mutuel, Crédit Agricole SA, Crédit Commercial de France, HSBC Continental Europe, La Banque Postale, RCI Banque, SFIL and Société Générale.

²¹ This includes only institutions subject to indirect ECB supervision (LSIs), not all institutions licensed and supervised exclusively by the ACPR, which include financing companies, investment firms and payment institutions, for example. It comprises: one non-SSM EEA branch, 23 subsidiaries of French LSIs and 77 French lead companies or independent LSIs.

²² See [Financial Stability Report](#) published in December 2024 on the Banque de France website.

²³ [Regulation \(EU\) 2019/2033](#) of the European Parliament and of the Council of 27 November 2019 on the prudential requirements applicable to investment firms and [Directive \(EU\) 2019/2034](#) of the European Parliament and of the Council on the prudential supervision of investment firms.

1.2.2 Monitoring the changes taking place in the banking sector

From a regulatory perspective, it was a busy year in cyber risk, with preparations to implement the DORA Regulation (see box on that topic), and also in crypto-assets, with MiCA's entry into force (see box on licensing the first electronic money token issuers).

The ACPR was actively involved in crisis management exercises organised in 2024 (ECB cyber stress test, G7 cyber exercise organised in coordination with the exercise conducted by France's Marketwide Robustness Group).²⁴ 

²⁴ The MRG, which is a Banque de France body in which the ACPR is represented, aims, through coordination and information-sharing activities, to ensure that a major operational crisis does not cause the financial system to seize up for a prolonged period.



EIOPA stress test

The European Insurance and Occupational Pensions Authority (EIOPA) organises stress tests according to a three-year schedule. The 2024 exercise involved 48 insurance groups, including ten French groups representing 32 individual French entities. ACPR teams took part in every stage. The simulated scenario was based on several assumptions:

- persistent geopolitical tensions, leading to high and lasting inflation;
- swift increase in short-term interest rates;
- heightened credit risk, depressing the value of bonds (corporates and public-sector issuers);
- decrease in equity valuations;
- adverse change in policyholder behaviours (massive surrenders, decrease in earned premiums).

Insurers had to simulate an extremely severe shock, far exceeding anything experienced in recent decades.

Post-shock solvency and liquidity indicators fell sharply, but insurers remained in a satisfactory position, in particular due to potential management actions taken. Factoring in these actions, the average liquidity indicator for all participants fell from 222% to 140%, showing that the risk is relatively low. Similarly, all French participants retained a post-shock solvency ratio of more than 100%, although impacts varied depending on business models. The test confirmed the resilience of the French insurance sector. •



Survey of open banking in France

In 2024, the ACPR conducted a survey of open banking at the six main French banking groups. Open banking, which is responsible for multiple interconnections between entities, is being conducted in particular through the two payment services introduced by the second Payment Services Directive (PSD2), namely account information services, which are the most developed, and payment initiation services. The opportunities opened up by open banking are being seized not only by traditional banking groups, but also by fintechs, most of which operate as licensed payment institutions. An ecosystem has taken shape in particular around firms providing technological infrastructure enabling data to be shared via application programming interface (APIs). The survey also underlined the international nature of this market, which features large European institutions. Beyond the scope of the PSD2, the ACPR's survey pointed to the emergence of paid services providing enhanced and personalised solutions for specific groups or catering to specific needs. The investigations also identified the steering and oversight systems set up by French banking groups to ensure compliance with PSD2's API-related requirements. •



Thematic review of LSI funding plans

Changes in interest rates and dwindling liquidity reserves are prompting banks to review their multi-year funding plans, which are critical to assessing refinancing sources and their cost. To assess the situation of France's LSIs, the ACPR, working in conjunction with the ECB, carried out a thematic review of a sample of entities selected based on their size and liquidity position.

Overall, the institutions had satisfactory refinancing capacity, and areas identified for attention were linked to the specific features of certain business models rather than to economic conditions. Improvements are chiefly expected in terms of planning and assessing the adequacy of refinancing, and more specifically concerning the quality and granularity of internal liquidity adequacy assessment processes (ILAAPs).

Guidelines from the European Banking Authority (EBA) on the ILAAP ²⁵ and funding plans ²⁶ set out best practices in this regard. The ACPR reiterates the need to establish emergency liquidity plans, quantitative projections covering several years, liquidity stress tests and reliable liquidity indicators. •

²⁵ See [Guidelines on the collection of information related to the ICAAP and ILAAP, as part of the SREP](#), on the EBA website.

²⁶ See [Guidelines on harmonised definitions and templates for funding plans of credit institutions](#), on the EBA website.



Implementing DORA

Europe's Digital Operational Resilience Act (DORA) Regulation, which came into force on 17 January 2025, aims to strengthen the rules on digital operational resilience. This framework, which is harmonised across the entire financial sector (banks and insurers), strengthens governance and IT risk management requirements, establishes a regime for disclosures and reporting IT security incidents to the European authorities, and introduces operational resilience tests by institutions, as well as arrangements for direct supervision by the European supervisory authorities of the most critical IT service providers at European level.

In this context, the ACPR worked on three main areas:

- It focused on preparations by the banking and insurance sectors for the new regulatory requirements through communication initiatives, including two conferences with the sectors to go over the new features introduced by DORA; it also took part in a test exercise to gather information on the IT service providers of financial entities, and adjusted its supervisory tools, which included changing the template for the internal control reports compiled by supervised institutions and publishing insurance notices to adapt the framework of the regular supervisory reports.
- At the same time, it modified its own organisation in order to be operational as soon as DORA came into force on 17 January 2025, and to be able to successfully carry out its new tasks, especially those connected with processing notifications relating to major incidents and registers of information, and monitoring penetration testing.
- It continued to participate actively in drafting the regulatory framework, including Level 2 European provisions and transposition work. •

2. ACTIVE INVOLVEMENT IN EFFORTS TO ADAPT THE REGULATORY FRAMEWORK AND IN INTERNATIONAL WORK

2.1 INSURANCE SECTOR

Following agreement on 13 December 2023 on the draft review of the Solvency II Directive, the legislation was finalised over the course of 2024 and adopted on 5 November 2024. In parallel, the ACPR was heavily involved, alongside the European Commission and EIOPA, in reviewing the directive's implementing provisions (see box on the Solvency II review), which will enter into application on 30 January 2027.

The ACPR also played a full part in designing and implementing the DORA framework (see box).

In reinsurance, the ACPR supported the publication of EIOPA's statement on the supervision of reinsurance concluded with third-country (re)insurance undertakings,²⁷ consistent with the decree on third-country (re)insurance adopted on 31 October 2023. In addition, the ACPR was involved in the preparation of EIOPA's opinion on the supervision of captives.²⁸

At international level, the insurance capital standard (ICS) developed by the International Association of Insurance Supervisors (IAIS) was finalised and adopted on 5 December 2024 (see box on adoption and implementation of the ICS).

2.2 BANKING SECTOR

At European level, the ACPR was involved in Basel III implementation as part of work by the EBA and preparations for national implementation of the banking package (see box on Basel III/CRR3 implementation). The ACPR offered proposals to support the European Commission's initiative to relaunch securitisation (see box on the ACPR's involvement in discussions on relaunching securitisation). And it published a discussion paper suggesting prudential measures to limit the risks linked to the rise of bigtechs in the financial sector. In the wake of the Noyer and Letta reports, the ACPR advocated for simplifying standards in the bodies to which it belongs.

On the international scene, the ACPR contributed to work by the Basel Committee on the follow-up to the banking turmoil of 2023, especially in terms of interest rate and liquidity risk, by identifying best supervisory practices. To glean lessons from other bouts of stress observed in the financial sector in recent years, the ACPR was also involved in finalising the report by the Financial Stability Board (FSB) on preparedness for margin calls, as well as in the publication of Basel guidelines on the management of counterparty risk related to non-bank institutions. The ACPR continued its engagement within the Network for Greening the Financial System (NGFS), in particular on management of nature-related financial risks. ●

²⁷ See [Supervisory Statement on the supervision of reinsurance concluded with third-country \(re\)insurance undertakings](#) on EIOPA's website.

²⁸ See [Opinion on Supervision of Captives](#) on EIOPA's website.



Solvency II review

The revised version of the Solvency II Directive was adopted on 5 November 2024. Once transposed into national law, the new measures will enter into application on 30 January 2027.

Work is currently being done on the directive's implementing provisions (revision of the delegated regulation, new technical standards, EIOPA guidelines to be revised or drafted) around three main priorities:

- the quantitative requirements are set by parameters, some of which are defined by the delegated regulation. These must be calibrated to ensure that the review has a neutral overall impact on the European and French markets, while steering savings towards the long-term financing of the economy;
- implementation of the new proportionality regime must be framed using criteria that have yet to be determined. The ACPR will ensure that these criteria deliver broad-based application of the regime, while supporting uniform treatment throughout Europe;
- the new sustainable finance measures are ambitious, in particular as regards transition plans. The ACPR will pay attention to how these measures interact with other regulatory initiatives, to make sure that insurers are not subject to more onerous requirements. •



ICS adoption and implementation

The insurance capital standard (ICS) is a global standard for measuring the solvency of internationally active insurance groups (IAIGs). The new standard will act as the quantitative component of the common framework (ComFrame), which forms a set of standards designed to ensure that IAIG supervision is performed on a comparable basis.

The ICS was adopted by the International Association of Insurance Supervisors (IAIS) in December 2024, after a decade of work. It sets down the principles for balance sheet construction, provides a framework for calculating the minimum capital requirement and determines eligible resources to cover the requirement. The ACPR, which has been involved since the project's inception, achieved its goals, namely:

- design a standard closely modelled on Solvency II;
- establish a single standard, since the alternative method proposed for US groups is set to be treated as an implementation of the ICS going forwards.

The ACPR and its European partners are now aiming for the Solvency II regime to be Europe's implementation standard for the ICS. With this in mind, assessment of Solvency II's compliance with the ICS will get underway in 2027, based on a single methodology for all jurisdictions, which will be drawn up starting in 2025. •



Basel III/CRR3 implementation

The ACPR was at the forefront of preparations to implement the CRR3/CRD6 banking package, which transposes the final Basel III Accord into European law:

- by contributing to work to prepare the EBA's technical standards and priority guidelines, particularly those dealing with credit, market, operational and climate risk;
- by contributing to or ensuring national implementation of some of the options provided by the regulation, aimed in particular at adjusting the impact of the output floor and recognising the risk coverage offered by the French guaranteed loan model as comparable to that provided by mortgage loans. The ACPR thus gathered and published data to allow French banks to activate various CRR3 provisions for the prudential treatment of real estate exposures. These elements were presented in two updates to the "Notice on Prudential Ratios", in June and December respectively, to ensure that the financial community was properly prepared for CRR3's entry into application on 1 January 2025;
- by working with the EBA on regular data collections to assess the impact of CRR3. •



ACPR involvement in discussions on relaunching securitisation

The ACPR contributed actively to discussions on relaunching Europe's securitisation market. If properly regulated and supervised, a developed securitisation market can be a powerful source of financing for the economy. Relaunching the market at European level has been recommended in various high-level reports by Christian Noyer, Enrico Letta and Mario Draghi, and is one of France's priorities within the framework of developing a European Capital Markets Union.

In this environment, the ACPR is supporting an ambitious review of the regulatory framework including targeted measures to simplify and adjust the existing requirements, particularly those relating to prudential and operational aspects. These proposals, which are dependent on maintaining solid safeguards and adequate transparency, seek to preserve the resilience of the financial system, while supporting sustainable growth of securitisation.

The ACPR, the Banque de France, the AMF and the Ministry for the Economy and Finance submitted a joint response to the consultation organised by the European Commission on the EU's regulatory framework for securitisation. •



3

CUSTOMER PROTECTION

90

ON-SITE INSPECTIONS

11

SURVEYS

1,924

ADVERTISEMENTS ANALYSED

6

FORMAL NOTICES

The ACPR is tasked with supervising the business practices of several hundred credit institutions and insurance undertakings, along with more than 65,000 intermediaries. As part of this, it examines the entire value chain involved in the production and distribution of financial products, from bank accounts to insurance contracts and online money pots. The ACPR cooperates with the AMF through a Joint Unit and dialogues with European counterparts, public institutions, industry and consumer representatives, and ombudsmen. The ACPR informs the public about financial products and scams via the ABEIS website and on social media.

1. SUPERVISORY PRIORITIES FOR 2024 RELATING TO BUSINESS PRACTICES

1.1 LOW VALUE-ADDED PRODUCTS

In 2024, the ACPR looked particularly at solutions combining banking and insurance products as well as insurance contracts linked to bank accounts. These products tend to be ill-suited to customers' actual needs, offering few benefits, and end up being under-utilised. Customers often keep them for several years without realising that they have them, owing to a lack of advice and information from distributors, both upon entry and during the product's life.

Since inspections had revealed the weak customer benefits of some insurance products for mobile products such as mobile phones, the ACPR carried out a campaign of 200 mystery shopping visits to look at marketing of these products by 11 distribution networks. While few visitors felt sales pressure to buy, most of them were not asked enough about their needs and expectations, nor were they correctly informed about the scope of coverage and the cooling-off period.

1.2 VALUE FOR MONEY²⁹ (VFM)

The ACPR completed its loan insurance review, which revealed that:

- the distribution of value between professionals (insurers and distributors) and customers in real estate loan insurance needs to be tilted more towards the latter. There is an even more pronounced imbalance in consumer loans, with fees to distributors accounting for up to three-quarters of the value of premiums;
- some firms have elevated claim rejection rates and do not do enough to monitor VFM.

Discussions were held with banking and insurance professionals at end-2024 to agree on initial measures to restore balance and track VFM more effectively.

As regards life insurance contracts offering unit-linked solutions, the annual review of investment vehicles resulting from marketwide work with the ACPR in 2022 and 2023 prompted insurance undertakings to take steps in relation to a significant number of unit-linked products whose VFM failed to uphold customer interests sufficiently over time. Insurers negotiated lower internal expenses with management companies or actually ceased distribution of more than 10% of unit-linked products offered to French customers. After fresh discussions with the ACPR in 2024, the industry agreed that expenses specific to the contracts themselves could be integrated in the mechanism to assess the VFM of individual life insurance contracts and retirement savings plans.

²⁹ See box entitled "What is Value For Money?".

1.3 DISTRIBUTION OF FUNERAL INSURANCE: THE ACPR'S RECOMMENDATION ³⁰ CONTINUES TO BE INADEQUATELY APPLIED BY THE MARKET

The ACPR inspected several major networks that market funeral insurance contracts following mystery visits in 2023 that revealed insufficient compliance with the authority's recommendation and in particular inappropriate customer information about how coverage works and incomplete identification of customer needs in order to offer appropriate products. Broadly, institutions paid attention to the findings shared last October and many non-compliances were in the process of being resolved in the course of 2024, with some institutions actually ceasing to market funeral contracts.

1.4 DORMANT BANK ACCOUNTS

The Eckert Act of 13 June 2014 on dormant bank accounts and unclaimed life insurance contracts established the requirements for accounts to be considered dormant and set down the obligations placed on institutions, notably with regard to asset identification, information, pricing and transfer to the Caisse des Dépôts et Consignations (CDC). In 2024, the ACPR conducted a series of on-site inspections to ensure that banks were complying with their obligations in relation to dormant accounts and safe-deposit boxes.

The checks revealed several types of breaches. For example, internal transactions sometimes caused accounts to be unduly reactivated. Customers received incomplete information. The regulatory cap of EUR 30 on fees for dormant deposit accounts was not applied systematically. Mechanisms to ensure compliance with obligations in relation to dormant safe-deposit boxes were not implemented in a timely fashion.

2. ENHANCED MARKET GUIDANCE

2.1 FOR PROFESSIONAL BROKERAGE ASSOCIATIONS: FROM SUPPORT TO OVERSIGHT

In 2024, the ACPR continued to provide support to the professional associations set up for the brokerage sector in 2022, made sure that they were stepping up information-system security and the quality of membership data, and checked their compliance with rules on industry representativeness. Working groups examined the methodology underpinning the in-depth checks that associations must periodically conduct with members to verify their liability insurance, financial guarantees, professional capacity and ongoing training. The associations now have access to common standards ensuring that all brokers and their agents get equal treatment and structured support to bring them into compliance. Finally, the filing of annual reports fuelled discussions aimed at taking stock of the associations' first two years of operation. Inspections will be carried out in 2025 to assess the effectiveness of the associations' systems and check that they are properly discharging their tasks.

2.2 UPDATE OF THE RECOMMENDATION ON GATHERING CUSTOMER INFORMATION TO DISCHARGE THE DUTY TO PROVIDE ADVICE IN INSURANCE

The duty to provide advice in insurance, which is mandatory in France, is provided in return for the fee paid. Since insurance products are often complex, professionals must provide their customers with high-quality support and offer products that meet their needs and requirements.

The revised recommendation on this topic addresses three goals:

- support insurance distributors in relation to the establishment of the duty to provide advice over time in life insurance and the new requirement for profile-based management solutions to include a minimum proportion of unlisted funds (under France's Green Industry Act);

- integrate obligations relating to the inclusion of customers' sustainability preferences;
- draw lessons from ACPR inspections in terms of the duty to provide advice, such as the need to avoid having multiple insurance solutions covering the same risks.

The scope of the recommendation was also extended to cover all insurance products. Recommendation 2024-R-03 was the topic of many discussions with professionals and consumer associations. It will enter into application on 31 December 2025.

2.3 DISPUTED TRANSACTIONS

The ACPR and the Banque de France teamed up to conduct a survey of 15 significant banking institutions, aimed at checking their implementation of the 13 recommendations issued by the Observatory for the Security of Payment Means (OSMP) on the reimbursement of fraud victims ³¹.

Blocking and dispute mechanisms were satisfactory overall, but refund requests often required the customer to file a complaint or form before being processed. When it comes to reviewing refund requests, many institutions:

- wait for receipt of the mandate by the issuer (direct debit) or a successful return of funds (credit transfer) before reimbursing;
- do not reimburse the expenses incurred or refuse to pay late fees;
- do not take account of the three categories of criteria defined by the OSMP, namely strong authentication methods, circumstances and technical parameters.

While efforts to improve customer awareness have advanced, gaps persist in some areas, e.g. the fact that the match between the IBAN and the beneficiary's name is not checked in credit transfers, or in relation to strong authentication/alerts for connections by new devices.

Finally, since quantitative data are frequently incomplete, the Banque de France decided to start monitoring them on a regular basis. ●

³⁰ See [Recommendation 2021-R-01 of 18 February 2021 on the marketing of life insurance contracts linked to funeral payment plans](#) on the ACPR's website.

³¹ See [OSMP recommendations on procedures for reimbursing fraudulent payment transactions](#) on the Banque de France's website.



Advice over time in life insurance

The 2023 Green Industry Act introduced the duty to provide advice over time in life insurance. This created an obligation for distributors to regularly monitor policyholders' requirements and needs, as these may change over time, to make sure that the contract is always suited to their situation.

The ACPR set out recommendations to support professionals:

- Expand advice over time to most life insurance contracts in order to treat policyholders fairly, since the legislative change applies only to new contracts, new subscriptions to existing group contracts and tacitly renewed contracts. These subtle distinctions are rather opaque to non-experts.
- While the duty to provide advice is not due to be updated until 2028, in most cases, the ACPR recommends that professionals get started in 2025 on the work needed to put the measures in place. •



What is Value For Money?

Value For Money (VFM) is a concept used to define a financial product's usefulness to a customer relative to its cost. The approach comes from financial-market regulation but has been applied to insurance products for several years now by the European Insurance and Occupational Pensions Authority (EIOPA). The European Commission's Retail Investment Strategy plans to revise the directives on marketing financial products with this in mind, in order to better protect individual investors and customers, by requiring VFM to be improved if it is unsatisfactory.

In life insurance (retirement savings), investment vehicles, and the contracts in which they are referenced, are chiefly assessed by looking at the ratio of costs to performance. In non-life, products are mainly evaluated by means of the loss ratio, i.e. the share of premiums that goes towards covering claims. •



4

ANTI-MONEY LAUNDERING AND COUNTER-TERRORIST FINANCING

35

ON-SITE INSPECTIONS

2

DISCIPLINARY SANCTIONS

3

FORMAL NOTICES

25

ACTION LETTERS

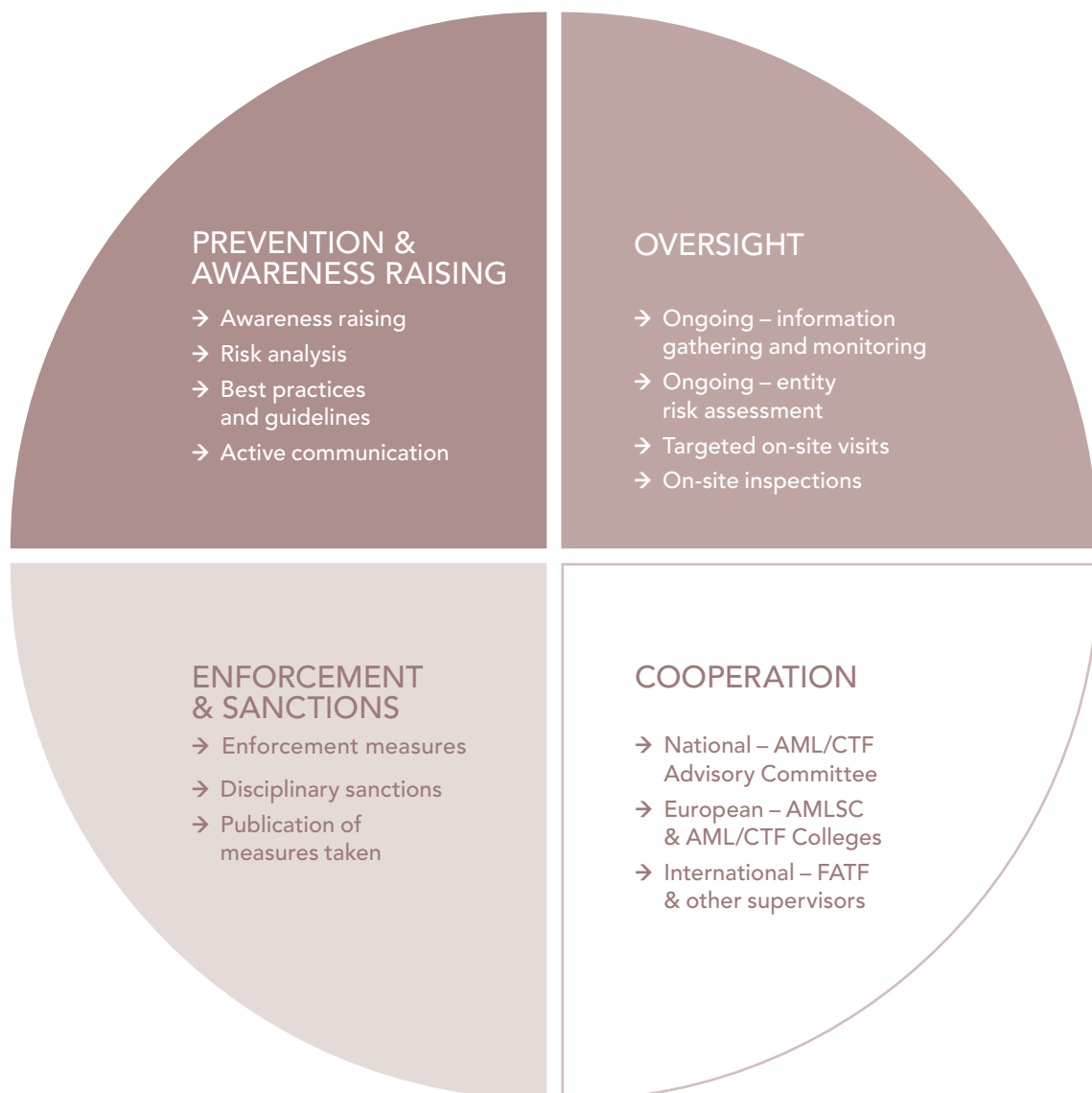
35

AML/CTF COLLEGES ORGANISED

The ACPR makes sure that the entities under its supervision, including institutions supervised directly by the ECB as regards prudential aspects, or those supervised as part of shared duties with the AMF, such as digital asset service providers, comply with their anti-money laundering and counter-terrorist financing (AML/CTF) obligations.

The ACPR checks the compliance of the preventive systems put in place as well as the effective implementation of appropriate AML/CTF due diligence measures. It also monitors the effectiveness of systems to detect people or entities subject to restrictions or asset freeze measures.

Supervisory practices are organised around four focus areas:



1. AWARENESS RAISING AND PREVENTION

The first component of the framework deals with analysing money laundering and terrorist financing (ML/TF) risks at the level of the financial sector. Updated in 2023, this sector ML/TF risk analysis is reviewed on a multi-year basis and acts as the financial sector sub-component of the national ML/TF risk analysis led by France's AML/CTF Advisory Committee.³²

Areas of risk and market developments are thus monitored by ACPR teams, in partnership with professional organisations and other public authorities, and are analysed by drawing on interviews, questionnaires and inspections at financial undertakings established in France. The use of virtual IBANs,³³ the rise of banking-as-a-service solutions³⁴ and private banking were among the topics analysed in 2024 from an AML/CTF perspective. Particular attention was paid to the laundering of fraud proceeds, i.e. to the accounts through which the proceeds from scams or other frauds are moved. Several institutions offering French accounts were approached, with a view to identifying best practices, as well as the riskiest types of conduct.

The findings of the analyses are shared with market participants during meetings with industry, including meetings of the ACPR's AML/CTF Consultative Commission or conferences organised by the ACPR, such as the event held on 4 July 2024, for instance.³⁵

This work also gives rise to guidelines, potentially co-drafted with other authorities, setting out the ACPR's expectations for specific aspects of participants' systems. In 2024, for example, the ACPR released sector enforcement principles on transactions in gold and other precious metals, which were co-drafted with the *Direction Générale des Douanes et Droits Indirects* (DGDDI – French customs authorities). It also teamed up with Tracfin, France's financial intelligence unit, to update joint guidelines on due diligence obligations for transactions and Tracfin disclosure and reporting obligations. The ACPR also provided its expertise to the *Direction Générale du Trésor* (DGT – French Treasury) on regulatory and legislative developments.

2. SUPERVISION

The ACPR implements a risk-based AML/CTF supervisory approach that was determined to be robust by the Financial Action Task Force (FATF) in its most recent assessment in May 2022. The ACPR applies a methodology for assessing the ML/TF risk profile of supervised entities. This assessment determines the level of supervision applied to each entity.

The teams responsible for ongoing supervision thus assess the ML/TF risks borne by undertakings supervised by the ACPR, drawing on annual industry-specific questionnaires, as well as thematic and sector reviews.

For most undertakings, the analysis relies on the annual AML/CTF questionnaire, which covers quantitative and qualitative aspects of the intrinsic risks of undertakings and the control mechanisms implemented by institutions. The ongoing supervision teams analyse other sources (interviews, annual AML/CTF reports, internal audit reports, etc.) and share information with the Treasury, Tracfin and other French or foreign authorities, notably in the context of AML/CTF Colleges and on-site inspections and visits carried out by the ACPR.

In 2024, the ACPR assessed or reassessed the individual risk profiles of 944 undertakings. Supervisory measures for these undertakings are determined based on the assessment findings. In total, 35 on-site inspections, including two conducted jointly with a prudential inspection, and two on-site visits were performed in 2024. Special attention was paid to participants with digital asset service provider (DASP) status, to track their recently established business and monitor changes to their business models, but also to review their effective implementation of the ML/TF risk management systems that they presented in their registration application. Crypto-assets come with elevated laundering risks, and it is important for DASPs to implement effective systems to manage these risks.

The ACPR's supervisory teams also communicate areas of attention to members of the financial community via conferences and webinars. For example, the ACPR was in touch with money changers in the first quarter of 2024, in the lead-up to the Olympics.

3. COOPERATION

Cooperation between national and international authorities is essential in AML/CTF, and the ACPR contributes actively to the work of France's AML/CTF Advisory Committee on themes relating to the entities under its supervision.

The ACPR sent:

- 315 suspicious transaction information items to Tracfin following on-site inspections and dealing with files not reported by inspected institutions from the banking or insurance sectors; and
- 77 notifications to the *Direction générale des Finances publiques* (DGFIP – Directorate General for Public Finances) about transactions raising tax-related suspicions.

Another example of cooperation with the DGFIP involved implementation of the provisions needed to apply the Organization for Economic Co-operation and Development's agreement on the automatic exchange of tax information. Under this framework, financial institutions submit an annual report to the tax authorities with information on their non-resident customers. The relevant tax authorities then exchange this information. Financial institutions must therefore ensure that the financial accounts of their customers are correctly identified, and especially their tax residency. The ACPR checks that the entities under its supervision have internal control systems that allow them to comply with these obligations.


At European level, the ACPR organised 35 meetings of AML/CTF Supervisory Colleges. These colleges comprised between three and several dozen AML/CTF supervisors, plus the EBA in some cases. The ACPR was asked to attend 59 meetings of AML/CTF Colleges and receives invitations to participate in new colleges organised by its sister authorities. The colleges are used to share individual ML/TF risk assessments between member authorities. The ACPR can thus take account of this information when conducting consolidated assessments of groups for which it is the lead supervisor. These colleges form the foundation for the future European supervisory system.

The ACPR is, moreover, fully engaged in efforts to set up the AMLA and is taking part in work on the regulatory framework, which is in the process of being established, as well as in the associated preparations; it also represents France on the General Board of the new European authority.

4. ADMINISTRATIVE ENFORCEMENT MEASURES AND INDIVIDUAL SANCTIONS

Depending on the seriousness of the breaches found, on-site inspections may give rise to an action letter, a formal notice, or, in the most serious cases, the initiation of disciplinary proceedings by the Supervisory College.

In 2024, follow-up from these on-site inspections gave rise to:

- 25 action letters identifying areas for improvement;
- 1 formal notice and 1 temporary ban on doing business initiated by the ACPR (administrative enforcement measures included in point III of Article 561-36-1);
- 2 sanctions imposed by the Sanctions Committee (sanction powers under point IV of the same article). 

³² France's AML/CTF Advisory Committee brings together and coordinates all government departments and supervisory authorities involved in AML/CTF, from prevention to enforcement and financial intelligence.

³³ IBANs that link automatically to a principal deposit or payment account with which they are associated.

³⁴ These solutions enable unregulated participants to offer, under their own name and to their own customers, financial services (generally payment) provided by other, regulated, participants, such as white-label payment cards or management of the third-party payment function (marketplaces, e-tailers, online gambling websites, etc.).

³⁵ See [Conference of 4 July 2024](#) on the ACPR's website.



5

RESOLUTION

4

RESOLUTION PLANS ADOPTED

5

SRB MEETINGS ATTENDED

1. IN 2024, THE ACPR CONTINUED ITS WORK TO IMPROVE THE RESOLVABILITY ³⁶ OF THE BANKING SECTOR, WITHIN THE FRAMEWORK OF THE SINGLE RESOLUTION BOARD'S NEW STRATEGY

The banking turmoil in 2023 outside the European Union underlined the importance of the work done to increase resilience and crisis preparedness. Within Europe, this work is being conducted as part of the EU mechanism for managing banking crises set up after the 2008 financial crisis: the Single Resolution Mechanism (SRM) gives supervisory and resolution authorities the means to take action to prevent and manage crises.

National authorities draw up a preventive resolution plan for each banking group, including a preferred resolution strategy in the event of a crisis. The ACPR participates actively in work on operational planning for the management of banking crises alongside its European sister authorities through Internal Resolution Teams (IRTs),³⁷ which are responsible for monitoring the 13 main French groups and four banking union banks with a subsidiary in France. It also does work for smaller institutions that are under its direct supervision within the banking union or under its specific authority. In 2024, the ACPR Resolution College thus adopted four preventive resolution plans, concerning two overseas institutions, one investment firm and one financing company. The Minimum Requirement for own funds and Eligible Liabilities (MREL), which is used to absorb losses and recapitalise institutions in the event of failure, supplements resolution plans.

Under the SRM's new strategy,³⁸ resolvability work is assigning greater importance to exercises aimed at testing banks' capacity to cope with resolution. The ACPR, along with the SRB, thus participated in two "deep dives" at two French banks. The two institutions also worked to improve the assessment methodology covering resolvability and the identification of substantial obstacles to resolvability at banking groups (resolvability heat-map). In addition, the ACPR pursued analyses and discussions, especially on reorganising the business of a failing institution following a bail-in³⁹ and on promoting strategies to combine resolution tools (see box).

To cover the costs of resolving crises at banking institutions once shareholders and creditors have borne their share, two distinct funds have been set up: a Single Resolution Fund (SRF) for credit institutions subject to direct or indirect supervision within the banking union, and a National Resolution Fund (NRF) for institutions under the ACPR's exclusive responsibility. The funds' resources are set at 1% of covered deposits at supervised institutions. This target was reached in 2023 for the SRF and the NRF, giving a total amount of EUR 79.5 billion for the former and EUR 70.8 million for the latter. While no contribution was levied for the funds in 2024, the ACPR continued to perform the calculations aimed at ensuring that the funds have the financing they need.

The ACPR also calculated contribution amounts required from institutions for the three guarantee schemes managed by the *Fonds de garantie des dépôts et de résolution* (FGDR – Deposit Insurance and Resolution Fund), namely the deposit, securities and bank guarantee schemes. It notified institutions of these amounts. Amid an increase in covered deposits, the rate setting the funding of the deposit insurance fund was kept just above the target of 0.5% of covered deposits, to ensure that depositors are protected up to EUR 100,000 per depositor and per institution. The resources available to the deposit guarantee scheme thus reached EUR 7.5 billion.

³⁶ Ability of an entity subject to a resolution regime to be effectively put into resolution or wound up in an orderly manner.

³⁷ IRTs are made up of staff from the Single Resolution Board (SRB) and National Resolution Authorities (NRAs) from the banking union countries in which the parent company or subsidiaries of the cross-border group are based. IRTs were set up for institutions that come under the direct responsibility of the SRB within the SRM.

³⁸ See [SRM: Vision 2028 – a strategy for the next phase of the SRM on the SRB's website](#).

³⁹ See [Réorganisation des activités après un renflouement interne : une analyse de la préparation des grands groupes bancaires français](#) on the ACPR's website.

On 18 April 2023 the European Commission published a proposal to revise the Crisis Management and Deposit Insurance (CMDI) framework.⁴⁰ The ACPR actively supported the Treasury in talks on the proposal, with the aim of strengthening Europe's resolution regime and encouraging greater harmonisation in its implementation.

2. A MORE IN-DEPTH NATIONAL RESOLUTION FRAMEWORK FOR THE INSURANCE SECTOR AHEAD OF THE EUROPEAN FRAMEWORK'S ENTRY INTO FORCE IN 2027

In 2017, France became one of the first EU countries to adopt a preventive recovery and resolution regime for the insurance sector. Leveraging this experience, the ACPR did work in 2024 to go deeper into several major themes, including critical function analysis, interconnectedness, activities that are major revenue or profit sources, governance and communication. In connection with this work, the content of the nine resolution plans drafted by the ACPR for the insurance sector was strengthened.

Improving the resolvability of insurance groups is a focal point for these efforts. To this end, discussions in 2024 on resolution entry points and on financial conglomerates will be the subject of talks with the financial community in 2025. Following consultations with the industry, the ACPR also published a method for performing the public interest assessment that seeks to clarify the procedures for choosing between judicial liquidation or the special resolution regime in the event of crisis (see box).

At European level, the ACPR continued to provide support to the Treasury in negotiations on adoption of the European Insurance Recovery and Resolution Directive (IRRDR) published on 8 January 2025.⁴¹ The directive is to be transposed into French law by January 2027.

The ACPR contributed actively to work organised by the European Insurance and Occupational Pensions Authority (EIOPA) to draft regulatory technical standards, implementing technical standards and guidelines arising from IRRDR. It also engaged in

exchanges with its foreign sister authorities to share national-level experiences and get ready for IRRDR implementation.

Internationally, the ACPR provided input to the work of the Financial Stability Board (FSB), which notably culminated in the publication of the list of global systemically important insurers, which are subject to specific expectations in terms of resolution planning.

3. A SECOND RESOLUTION PLANNING CYCLE FOR CENTRAL COUNTERPARTIES, WITH A FOCUS ON OPERATIONAL IMPLEMENTATION OF TOOLS AND INTERNATIONAL COOPERATION

Central counterparties (CCPs) are under the direct responsibility of national authorities designated by EU Member States. France's CCP is LCH SA.

Since Regulation (EU) 2021/23 on a framework for CCP Recovery and Resolution (CCPRRR) came into application on 12 August 2022, LCH SA has had a special framework to draft its preventive recovery plan and its preventive resolution plan.

The ACPR adopted an incremental working method in this context, similar to the SRB's approach to the banking sector, in order to arrive at a full preventive resolution plan over several cycles. In 2024, the ACPR deepened and widened the scope of the topics examined in order to increase LCH SA's resolvability. This work was presented to the college of LCH SA resolution authorities in November 2024. Chaired by the ACPR, this second meeting of the college, which was attended by 30 or so European and international authorities, gave rise to fruitful discussions on CCP resolution.

At European level, ESMA set up a CCP resolution committee in 2023, pursuant to CCPRRR provisions. In 2024, the establishment of two working groups enabled the ACPR to participate in drafting new guidelines aimed at harmonising practices and interpreting European provisions on assessing CCP critical functions and on applying the liquidity call tool for resolution purposes. Internationally, the ACPR took

part in work by the FSB's specialised group in charge of CCP resolution planning. The group aims to share the experiences of different authorities in implementing FSB guidelines on available financial resources and the treatment of equity in resolution. ●

⁴⁰ See [Reform of bank crisis management and deposit insurance framework](#) on the European Commission's website.

⁴¹ See [Directive \(EU\) 2025/1](#) of the European Parliament and of the Council of 27 November 2024 establishing a framework for the recovery and resolution of insurance and reinsurance undertakings.



Advances in combining resolution instruments

The ACPR promotes the use of transfer resolution strategies to supplement bail-ins, including at large banks, in order to have significant room for manoeuvre in the event of a crisis. During the banking turmoil of 2023, for example, US and Swiss authorities used transfer tools to support a return to financial stability, which involved transferring business to a bridge bank (US regional banks) or to a private buyer (UBS takeover of Crédit Suisse).

In 2024, the ACPR presented a working paper on combining transfer and bail-in mechanisms for large banks, as part of international discussions organised in part by the Financial Stability Board (FSB). The ACPR was also involved in an SRB working group tasked with designing and drafting a new policy for resolution strategies using combinations of instruments, which will provide a harmonised framework in the banking union to determine new strategies for major banks that go beyond bail-ins alone. •



Public interest assessment: a key tool for the resolution of insurance undertakings

The public interest assessment (PIA) is an essential tool in the preparation and eventual implementation of a resolution procedure for an insurance undertaking that is failing or likely to fail. The ACPR's Resolution College must assess whether such an initiative is preferable to judicial liquidation under ordinary law.

The PIA considers the four objectives of resolution, namely to ensure the continuity of critical functions, maintain financial stability, limit the use of public funds, and protect the rights of policyholders and beneficiaries. A positive PIA indicates that implementing a resolution procedure would offer a manifest comparative benefit. Conversely, a negative PIA indicates that the undertaking should go into judicial liquidation. The assessment is carried out at two key moments: during the planning phase, in order to anticipate the crisis and prepare the necessary measures, and then at the time of failure, in order to tailor measures to the circumstances of the crisis.

The current approach is based especially on protecting critical functions, which is a key objective that overlaps with the others. An undertaking is deemed to perform critical functions if its market shares exceed 10%. This assessment is based on a list of six critical functions established by the Resolution College.

In judicial liquidation, critical functions are not protected as such, which tends to support a strong presumption that undertakings performing at least one such function will have a positive PIA. Each situation is subject to an expert analysis and considered on a case-by-case basis. •



6

ACTIVITY OF THE SANCTIONS COMMITTEE

6

NEW CASES

16.75

MONTHS ON AVERAGE TAKEN
TO HANDLE A CASE

3

RULINGS HANDED DOWN

1. OVERVIEW

Owing to the small number of cases in 2023 (four) and slightly longer processing times, the Committee handed down just three rulings in 2024, all involving institutions from the banking sector: two decisions dealt with AML/CTF and asset freeze measures, while the third punished breaches of internal control, risk management and governance obligations.

The Committee issued three reprimands and three fines, ranging from EUR 1 million to EUR 2.5 million. Total fines came to EUR 5.2 million. The Committee also named the entities concerned by its decisions for a period of five years.

Despite the small increase in the number of cases in 2024, the Committee will continue, at least in 2025, to be significantly less active than it was prior to the Covid-19 crisis.

2. MAIN TAKEAWAYS FROM THE 2024 RULINGS

2.1 OBLIGATIONS RELATING TO ANTI-MONEY LAUNDERING, COUNTER-TERRORIST FINANCING AND ASSET FREEZE MEASURES

In *Treezor Ruling No. 2022-07 of 9 April 2024* (reprimand and fine of EUR 1 million, decision published on a non-anonymous basis for five years), the Committee considered that the electronic money institution, which provided, via a programming interface, a range of white-label payment services to its customers, chiefly fintechs registered as agents of payment service providers, had, at the time of the inspection, failed to establish a risk profile for its business relationships in order to comply with its ongoing due diligence and transaction monitoring obligations: the rating system was insufficiently discriminating and inconsistent with the risks to which the entity was exposed, know-your-customer (KYC) data were unreliable, and the risk profile had no impact on the intelligence gathered. The Committee noted the inadequacy of the automated transaction monitoring system, which, being mainly designed to prevent the risk of documentary fraud, was unable, despite some overlap between AML and documentary fraud prevention, to ensure that Treezor

complied fully with its AML/CTF obligations, and in particular: the obligation to detect unusual transactions with regard to the business relationship profile; the obligation to deal with warnings and follow up on them appropriately by either classifying them for no further action if the unusual nature of the transaction with regard to the business relationship profile could be explained or, if this was not the case, by taking steps, as appropriate, to conduct an enhanced investigation or file a suspicious transaction report (STR); and the obligation to justify these choices, in particular by explaining why cases were designated for no further action.

The Committee also identified several failures to conduct enhanced investigations and file STRs as well as some untimely STR submissions, which revealed shortcomings in the transaction monitoring system.

Conversely, the Committee dismissed the complaint relating to internal control, after reiterating the need to distinguish between two obligations, namely: the obligation to establish an adequate internal control system, set down in Article 11 of the Order of 3 November 2014,⁴² and substantially taken up by Article 13 of the Order of 6 January 2021; and the obligation to remedy compliance breaches within a reasonable timeframe, which stems from Articles 11 and 38 of the 2014 order, especially those that should be flagged by an effective internal control system. In this instance, it was impossible to tell which of the two obligations the institution was accused of breaching.

In determining the sanction, the Committee noted that Treezor had quickly introduced corrective measures by improving its risk classification and procedures, by upgrading its IT tools, by reorganising its compliance and internal control departments and by significantly strengthening the HR resources assigned to these tasks. It also considered the firm's financial position, which had deteriorated significantly over the recent period.

⁴² Order of 3 November 2014 on the internal control of companies from the banking, payment services and investment services sector subject to ACPR supervision.

In *Banque régionale d'escompte et de dépôts (BRED)* Ruling No. 2023-01 of 6 June 2024 (reprimand and fine of EUR 2.5 million, decision published on a non-anonymous basis for five years), the Committee considered that the institution's automated transaction monitoring system had several significant deficiencies at the time of the inspection, including the following: certain scenarios were deactivated or exempted for some accounts or transactions, without being compensated for by another mechanism; some scenarios were incorrectly configured (the Committee used this opportunity to reiterate that incorrectly configuring a scenario constitutes, in and of itself, a failure in the system to detect unusual transactions); the customer database had incomplete information on the income or turnover of many customers, a problem not addressed by artificially classifying these customers in the monitoring system's lowest income/turnover bracket, since this classification artificially increased the number of warnings likely to be triggered and therefore interfered with the effectiveness of the institution's system; inadequate evidence was provided for the classification of warnings.

The Committee also identified several failures relating to enhanced investigations and STRs. In this regard, referring to cases that have given rise to a judicial requisition, it noted that a supervised undertaking shall be considered to have failed in its Tracfin reporting obligation if the examination of the business relationship that it is required to perform after receiving a judicial requisition or following Tracfin's exercise of its right to request information reveals suspicious transactions that are different from those mentioned in these documents, either because the purpose is different or because they were executed during another period.

Conversely, it dismissed the complaint that BRED had failed to meet the obligation allegedly arising, according to the charges, from Article L. 561-5-1 of the Monetary and Financial Code (MFC), for supervised undertakings, at least large ones such as BRED, to use a watchlist to screen for negative public information that could affect customer risk profiles, and especially information about convictions for activities connected with terrorist acts.

The Committee said that it was impossible to consider that MFC Article L. 561-5-1 could be interpreted, at the time of the inspection, as implicitly but necessarily creating such a clear and predictable obligation.

It noted that such a legal interpretation was predicated on the notion that, for an entity the size of BRED, with such diverse activities and customers, the use of a watchlist, whether prepared inhouse or acquired on the market, was the only way to ensure adequate knowledge of business relationships, which is vital to an effective AML/CTF system.

The Committee did however observe that no court decision had yet settled the question of whether, as argued by BRED, Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR) and France's Data Protection Act No. 78-17 of 6 January 1978 prevented a supervised entity from using a watchlist.

Considering that, in any event, it had a duty to ensure at all times that the obligation that it upheld through its interpretation was, at the time of the inspection, clear and predictable for a knowledgeable professional, and that a breach of this obligation could therefore be punished, the Committee made the initial observation that watchlists constitute processing of personal data, both for the entity that creates them and, where applicable, sells them, and also for the entity that uses them.

It said that the use of watchlists by supervised undertakings could definitely be justified on "public interest" grounds, within the meaning of point 1e) of Article 6 of the GDPR, which deals with AML/CTF. But it noted that watchlists are also intended to gather personal data on criminal convictions and offences, within the meaning of Article 10 of the GDPR and of Article 46 of the French Data Protection Act – indeed, this is an essential element for the purpose of AML/CTF objectives – and that there was, in this respect, a specific problem at the time of the inspection, since GDPR Article 10 states that processing of such data may be carried out only "under the control of official authority", while Article 46 of the French Data Protection Act authorises such processing only in specified instances. Although GDPR Article 10 states that such processing may take place where "authorised by Union or Member State law providing for appropriate safeguards for the rights and freedoms of data subjects", the question is whether such authorisation, together with "appropriate safeguards", existed and, in particular, whether it could be found in the provisions of MFC Article L. 561-5-1 or in the AML Directive.

On this point, after finding that the various provisions on this subject to which the charges referred could not be deemed to apply, the Committee noted that the Regulation of 15 May 2024 of the European Parliament and of the Council on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, whose Article 76 authorises obliged entities to process, under specified conditions, special categories of personal data referred to in Article 9(1) of Regulation (EU) 2016/679 and personal data relating to criminal convictions and offences referred to in Article 10 of that Regulation, had in any case only just been adopted.

2.2 INTERNAL CONTROL, RISK MANAGEMENT AND GOVERNANCE OBLIGATIONS

In its *Tunisian Foreign Bank (TFB) Ruling No. 2023-02* of 9 October 2024 (reprimand and fine of EUR 1.7 million, decision published on a non-anonymous basis for five years), the Committee punished serious internal control deficiencies found during the on-site inspection. The permanent control system was neither exhaustive nor reliable, and the HR resources assigned to it were inadequate; internal audit was similarly under-resourced to properly conduct the investigations that should have been executed; monitoring of recommendations was deficient; and companies providing essential outsourced services were inadequately overseen. These breaches persisted for a prolonged period, because similar deficiencies were partly noted during an on-site inspection carried out in 2011 and punished by the Committee's ruling of 1 March 2013.

The Committee identified other serious risk management and governance breaches, including the following: deficiencies in the measurement and management of interest rate, currency, market and operational risk; failure to establish a risk tolerance framework (which could not be considered to be optional, as claimed by TFB); the lending procedure was flawed in some instances, and there was no formal process for regularly reviewing loan files; there was no remuneration policy designed to prevent conflicts of interest and dealing with performance assessment, payment of variable remuneration, and risk takers; there were likewise no procedures specifying responsibilities and methodological choices used in calculating the solvency ratio.

In determining the sanction, the Committee took into consideration, among other things, TFB's implementation of several corrective measures and the elevated and recurring losses that the entity had sustained.

3. INFORMATION ABOUT APPEALS AGAINST SANCTIONS COMMITTEE RULINGS

Caisse Régionale de Crédit Agricole Mutuel du Languedoc (CRCAM Languedoc) Ruling No. 2021-05 of 1 December 2022 was appealed before the *Conseil d'État*. The appeal was dismissed in a decision on 5 February 2024 (No. 470957).

In addition, after the *Conseil d'État* dismissed its appeal (No. 399491), a union of mutual insurance companies disciplined by the Committee on 11 March 2016 for breaches committed by a company that it took over during a disciplinary procedure (*Ruling No. 2015-02 and No. 2015-03 on Company C as successor in interest to Company A of 11 March 2016*), filed an application on 27 April 2018 against France with the European Court of Human Rights. In a ruling handed down on 24 October 2024 (*Ruling No. 20224/18*), the Court considered that by imposing a fine on the applicant in an anonymised decision, the ACPR's Sanctions Committee had not breached the principle that punishment should only be applied only to the offender. Accordingly, the entity's application was deemed to be unfounded, declared inadmissible and dismissed. ●



SUSTAINABLE FINANCE AND CSR

1. SUPERVISION OF CLIMATE RISK AND ITS IMPLEMENTATION

1.1 THEMATIC REVIEW OF CLIMATE AND ENVIRONMENTAL RISKS IN THE BANKING SECTOR

As it did in 2023, the ACPR conducted a thematic review in 2024 to analyse the inclusion of climate and environmental risks in the strategy, governance and risk management of institutions under its direct supervision, namely less significant institutions (LSIs) and specialised institutions. A self-assessment questionnaire, filled out by a sample of 90 entities, compared with around 60 in 2023, helped to continue raising awareness among institutions about these issues and to assess the progress made in the last year.

Overall, recognition of the impact of climate and environmental risks improved between the two exercises. A growing number of entities confirmed that they are analysing the impact of these risks on their economic environment. Likewise, more and more of them are integrating climate and environmental risks in their risk management systems, including via their internal capital adequacy assessment processes (ICAAP for credit institutions, ICARAP for investment firms). Respondents also reported that senior managers and employees are increasingly being trained in these risks.

However, improvements remain to be made, particularly by smaller entities, as too few institutions include climate and environmental risks explicitly in their risk tolerance frameworks. Similarly, these risks are insufficiently integrated in assessments of credit risk exposure.

As regulations are stepped up, notably with the entry into application of CRD VI in January 2026, the ACPR will pay increased attention to these risks in the coming years.

1.2 THEMATIC REVIEW OF SUSTAINABILITY RISKS IN THE INSURANCE SECTOR

In 2024, the ACPR conducted a thematic review that covered 90% of the French insurance and reinsurance market by premium volume, to analyse the recognition of sustainability risks (i.e. environmental risks, including nature-related, social and governance risks) in insurers' governance and risk management systems.⁴³ An *Analyses et Synthèses* report published by the ACPR on 7 April 2025⁴⁴ clarified the supervisor's expectations in this regard.

The survey highlighted differences in maturity between undertakings in how far they have come in this integration. Whereas 68% of undertakings have modified their strategy to take account of sustainability risks and 57% of undertakings describe these risks as "material" to their business, just half of them include these risks in their written policies as per the regulations.⁴⁵ According to the survey, investment risk management policies incorporate sustainability risks most effectively, although at some undertakings, this merely entails including environmental, social and governance (ESG) criteria in the investment criteria. Conversely, climate change-related risks seldom lead to changes to provisioning methodologies for written underwriting and provisioning policies. Regarding the assessment of climate change-related risks in the Own Risk and Solvency Assessment (ORSA), EIOPA recommends⁴⁶ specific scenarios and a longer time horizon than that used to assess other risks, which are measured according to the same horizon as strategic plans,⁴⁷ to determine the materiality of the impacts associated with climate change. The vast majority of undertakings (75%) do not properly apply this recommendation, whereas compliance helps to improve the quality of assessments.

⁴³ See [Delegated Regulation 2021/1256](#) on the eur-lex website.

⁴⁴ [Analyses et Synthèses](#) report on the ACPR's website.

⁴⁵ Underwriting and provisioning policy, investment risk management policy and remuneration policy.

⁴⁶ See [Application guidance on climate change materiality assessments and climate change scenarios in ORSA](#) on EIOPA's website.

⁴⁷ i.e. four or five years.

The scenarios for the ACPR's 2024 climate stress test exercise used by undertakings were selected for their marketwide relevance but do not fully meet EIOPA's ORSA recommendations. According to EIOPA, the scenarios and shocks used in the ORSA process should consider the specific vulnerability points of each insurer. Meanwhile, one of the two long-term scenarios should be aligned with the temperature indicator of the Paris Agreement (global temperature increase < 2°C), while the other should include a global temperature increase of well above 2°C.

To integrate sustainability risks more effectively, in line with the stated willingness of a majority of insurance undertakings, several items for attention were identified:

- ensure that all sustainability risks are correctly assessed through the application of uniform principles throughout the same insurance group;
- ensure that the data and methodologies used in internal risk assessment work and published data are consistent;
- raise awareness and provide training in sustainability risks for all persons responsible for risk management.

1.3 EUROPEAN AND NATIONAL WORK ON GREENWASHING

The ACPR extended the survey conducted in 2023 on greenwashing risk in the distribution of life insurance and retirement products. Following a results briefing during the Customer Protection Morning held on 6 March 2024, a campaign of on-site visits at several distributors of savings products in 2024 was used to assess the systems in place to gather customers' extra-financial preferences and integrate them in advice.

In 2024, the authority noted a 50% decrease in communications promoting extra-financial claims. These advertisements made up just 8% of communications, down from 15% in 2023. The ACPR will continue to monitor information on the topic to ensure that it is transparent and balanced.

The ACPR's greenwashing initiatives also informed work at European level by EIOPA and the EBA. In May 2024, the European agencies submitted to the European Commission their final reports on greenwashing,⁴⁸ which put forward several recommendations aimed at more effectively regulating business practices

relating to the distribution of financial products that are presented as being sustainable, as well as the disclosures on these products required by Europe's Sustainable Finance Disclosure Regulation (SFDR).

2. CSR AT THE ACPR

The ACPR conducts numerous activities in the areas of sustainable finance and corporate social responsibility (CSR). These efforts are part of the CSR strategy established and steered by the Banque de France. The ACPR contributed significantly to several major goals of the CSR strategy, such as reducing greenhouse gas emissions by at least 15% relative to the 2019 baseline year, through measures including digital sobriety, lowering the energy consumed by buildings, and reducing CO₂ emissions generated by business travel.

It also worked on the social component of the Banque de France's CSR strategy, which seeks to promote diversity in hiring and ensure fair treatment, and took part in several community engagement events.

2.1 REDUCING THE ACPR'S ENVIRONMENTAL FOOTPRINT

2.1.1 Digital sobriety

Raising awareness about digital responsibility was again given pride of place in the ACPR's CSR initiatives. Every ACPR and Banque de France employee has a digital profile and can access an individual dashboard to track their impact and use available measures to take action. To help in this regard, regular reminders were issued about the need to shut off IT equipment, and printers were set to energy saver mode.

2.1.2 Responsible real estate

Energy sobriety: lighting, heating and A/C work

The ACPR's main building on place de Budapest has been granted High Environment Quality (HQE) certification. In 2024, LED lighting was installed in the building's circulation spaces.

Composting to reduce the ACPR's carbon footprint

In 2022, the ACPR set up a compost bin in the garden of its Paris offices with the aim of reducing non-recycled waste. Coffee grounds, paper teabags, fruit peelings, cardboard and other food waste is now composted thanks to employee participation and the hard work of the 15 or so project leads. The compost is being used to improve the soil in the ACPR's green spaces.

NoEE, the new application to steer the reduction in greenhouse gas (GHG) emissions

NoEE, a new app, was introduced in October 2024 to calculate the GHG emissions generated by the ACPR and the Banque de France's activities. Its purpose is to introduce greater automation to the collection, control and processing of activity-related data flows, in order to track the carbon footprint. Communication and reporting of results have also been enhanced, in line with national standards (carbon assessment, regulatory assessment of greenhouse gas emissions) as well as international standards (GHG Protocol). The goal is to manage GHG emissions more effectively through accurate steering of the carbon trajectory over the medium and long term, based on the action plans executed in each of our business areas.

2.1.3 Sustainable mobility

Sustainable mobility incentive scheme

In 2024, around 200 ACPR staffmembers took part in this scheme. Most of them said that they used bicycles to get around.

The sustainable mobility incentive scheme, which is part of the CSR strategy, offers financial incentives to use sustainable transportation methods for commuting, namely:

- standard and electric bikes (personal and rental);
- carpooling (driver or passenger);
- carsharing with electric, hybrid rechargeable or hydrogen cars;
- public transport tickets (excluding passes).

The scheme was introduced in response to the French Mobility Act of 26 December 2019.

Compliance with "carbon budgets" for business travel

In 2024, the ACPR, like the Banque de France, took part in the strategy aimed at curbing emissions linked to business travel. Out of its "carbon budget", which set a target emissions allowance of 266 tonnes of carbon equivalent, the ACPR used just 196 tonnes. Efforts focused on plane travel, which is the most polluting method, whose emissions fell by 18% compared with 2023 and by around 60% on 2019.

2.2 EMPLOYEE-CENTRED INITIATIVES

2.2.1 A commitment to equality, diversity, inclusion and employability

The ACPR continued to pursue its commitment to gender equality in 2024. As at 31 December 2024, women made up 50.5% of the ACPR's workforce and men made up the remaining 49.5%. The share of women occupying management functions has increased: women hold 44% of management positions, up from 43% in 2023. The share of women among directors and deputy directors has risen, climbing from 40% in 2023 to 41% in 2024.

The hiring methods employed by the ACPR and the Banque de France, especially competitive examinations, and non-discrimination training for recruiters likewise promote diversity.

The ACPR also works alongside the Banque de France to promote the employment of people with disabilities, assisting them to get started in their positions and integrate within the ACPR.

2.2.2 Collaborative and caring initiatives ⁴⁹

In 2024, ACPR employees signed up as part of the Banque de France's sponsorship activities for a number of environmental, company and community challenges, including World Cleanup Day, the annual donation drive for Restos du Cœur, a charity, and the No Finish Line charity race.

⁴⁸ See final reports by [EIOPA](#) and the [EBA](#) on greenwashing.

⁴⁹ See Appendix 3.

2.3 RESPONSIBLE INVESTMENT AND PURCHASING

The ACPR also takes part in the Banque de France's responsible investment and purchasing approach,⁵⁰ as a response to sustainability challenges. It acts in accordance with the Banque de France's 2024-2026 scheme to promote socially and environmentally responsible purchasing (SPASER), which incorporates environmental performance criteria, circular economy-related product requirements, and the inclusion of social clauses in purchasing procedures. ●

⁵⁰ See [Banque de France Annual Report 2024](#), Chapter 5 on social and environmental responsibility.



Collectif Agir pour la Planète (CAP), a collaborative initiative designed to promote CSR, celebrates its first year

In 2023, ACPR employees created *Collectif Agir pour la Planète (CAP)*, an environmental discussion group aimed at helping to quickly and massively instil a climate and environmental risk culture within the ACPR and Banque de France.

A year after it was set up, CAP has more than 350 members and has already organised several events:

- a conference moderated by Evelyne Massé, First Deputy Secretary General of the ACPR, and attended by Julien Le Fournier ⁵¹ and Hervé Guez ⁵² entitled “Greenfinance: hope or (dis)illusion?”;
- lunch debates to share information and talk about a range of topics, such as carbon bombs, for example;
- short, informal business line meetings to talk about activity at and/or the latest news from an ACPR or Banque de France department involved in sustainable finance issues. •

⁵¹ Independent consultant and co-author of *L'illusion de la finance verte* (2021) with Alain Grandjean.

⁵² Director of investment management, equities, fixed income and social impact investing at Mirova and co-author of *Pour une finance positive* (2024) with Philippe Zaouati.



8

GOVERNANCE

36

SUPERVISORY COLLEGE MEETINGS

4

RESOLUTION COLLEGE MEETINGS

4

SANCTIONS COMMITTEE MEETINGS

1,085

FTE

1. DECISION-MAKING BODIES

To discharge its statutory objectives, the ACPR relies on a number of decision-making bodies, including the Supervisory College and its various configurations (plenary and restricted sessions and sub-colleges for each sector), the Resolution College and the Sanctions Committee.

To provide it with further information on some of the topics it has to address, the ACPR's Supervisory College is supported by an Audit Committee, four consultative commissions covering prudential affairs, AML/CTF, business practices, and climate and sustainable finance respectively, and a Scientific Consultative Committee. These different bodies met 22 times in 2024.

THE SUPERVISORY COLLEGE

(AT 1 MAY 2025)



François VILLEROY de GALHAU
Governor of the
Banque de France,
Chairman of the ACPR



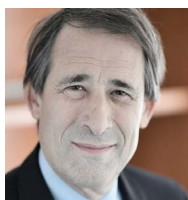
Denis BEAU
Deputy Governor
of the Banque de France



Jean-Paul FAUGÈRE
Vice-chairman
of the ACPR



Marie-Anne BARBAT-LAYANI
Chair of the AMF



Robert OPHÈLE
Chairman of the *Autorité
des normes comptables*



Marianne VERDIER
Professor of Economics
at Panthéon-Assas
University, appointed
by the President
of the Senate



Christelle LECOURT
Professor of Finance
at Aix-Marseille
University, appointed
by the President of the
National Assembly



Fabien RAYNAUD
Member of the *Conseil
d'État*, appointed at
the recommendation
of the Vice-Chairman
of the *Conseil d'État*



Marie-Laure BELAVAL
Honorary Counsellor at
the *Cour de Cassation*,
appointed at the
recommendation of
the Chairman of the
Cour de Cassation



Denis MORIN
Honorary presiding judge at the
Cour des Comptes appointed
at the recommendation
of the Chairman of the
Cour des Comptes



Patricia CRIFO, David NOGUÉRO

Appointed for their expertise in customer protection, quantitative or actuarial techniques, or other areas that help the Authority fulfil its statutory objectives



Jean-Louis DAVET, Cécile GÉRARD, Frédéric HÉRAULT, Anne LARPIN-POURDIEU

Appointed for their expertise in insurance, mutual insurance, provident institutions or reinsurance



Denis ALEXANDRE, Agnès de CLERMONT-TONNERRE, Pascal DURAND, Isabelle LEFEBVRE

Appointed for their expertise in banking, electronic money issuance and management, payment services or investment services

The following do not have a vote, but may request that matters be deliberated a second time:

Bertrand DUMONT

The Director General of the Treasury, or his representative, sits on the College in all its configurations,

Pierre PRIBILE

The Director of the Social Security administration, or his representative, sits on the Insurance Sub-College or other configurations dealing with entities governed by the Mutual Insurance Code or the Social Security Code

THE RESOLUTION COLLEGE

(AT 1 MAY 2025)



**François
VILLEROY de GALHAU**
Governor of the Banque de
France, Chairman of the ACPR



Jean-Paul FAUGÈRE
Vice-Chairman of the ACPR



Bertrand DUMONT
Director General of the Treasury



**Marie-Anne
BARBAT-LAYANI**
Chair of the AMF



Denis BEAU
Deputy Governor
of the Banque de France



Vincent VIGNEAU
Presiding judge at the
Commercial, Financial
and Economic Chamber
of the *Cour de Cassation*



Anthony REQUIN
Chairman of the
Executive Board
of the Deposit Insurance
and Resolution Fund

THE SANCTIONS COMMITTEE

(AT 1 MAY 2025)

Appointed by the Vice-Chairman
of the *Conseil d'État*

Appointed by
the Chairman of the
Cour de Cassation



Pierre COLLIN
Member of the
Conseil d'État, Chairman



Gaëlle DUMORTIER
Member of the *Conseil d'État*,
Full Member



Édith SUDRE
Counsellor at the *Cour*
de Cassation, Full Member



N.



Christophe POURREAU
Junior Member of the
Conseil d'État, Alternate



Nicolas MICHON
Counsellor at the
Cour de Cassation, Alternate

Appointed for their expertise in matters that are helpful for the ACPR to meet its statutory objectives



Claire CASTANET
Full Member



Georges DECOCQ
Full Member



François ROSIER
Full Member



Jean-Michel BERLING
Alternate



Pascale FASSINOTTI
Alternate

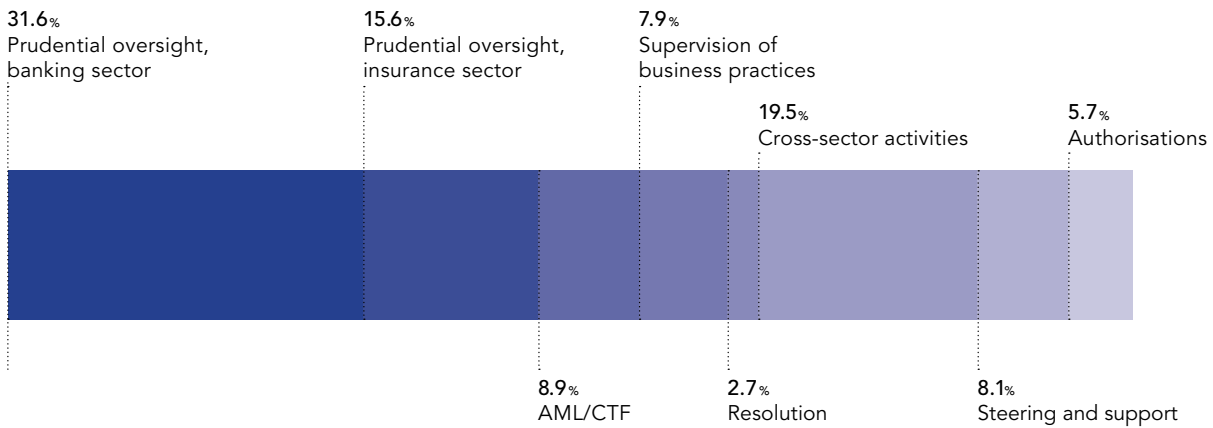


Odile TESSIER
Alternate

2. GENERAL SECRETARIAT

The ACPR’s departments are overseen by the General Secretariat. The average annual headcount in full-time equivalent (FTE) terms stood at 1,085. At 31 December 2024, the staff headcount comprised 1,103 employees

(1,068.4 FTE), including 546 men and 557 women. These staff members, who have a wide range of backgrounds, are distributed as follows in the Authority’s different areas of activity:





COMPOSITION OF THE ACPR GENERAL SECRETARIAT

From left to right
and from top to bottom

Secretary General

Nathalie AUFAUVRE

First Deputy Secretary General

Evelyne MASSÉ

Deputy Secretaries General

François HAAS

Frédéric HERVO

Frédéric VISNOVSKY



ACPR GENERAL SECRETARIAT (AT 1 MAY 2025)







DIRECTORS, ACPR GENERAL SECRETARIAT

From left to right and from top to bottom
 Marc Baran, Jean Boissinot, Mary-Cécile Duchon,
 Olivier Fliche, Olivier Prato, Anne-Laure Kaminski,
 Ludovic Lebrun, Eric Molina, Emilie Perez-Alexandre,
 Emmanuel Rocher, Alain Sanz, Barbara Souverain-Dez,
 Marie-Lorraine Vallat, Grégoire Vuarlot



9

BUDGET AND ACTIVITY MONITORING

234.3

INCOME (EUR MILLION)

-1.7

INCOME (EUR MILLION)

236

EXPENSES (EUR MILLION)

The ACPR is financially independent,⁵³ thanks to the income generated by contributions paid by undertakings under its supervision, within the limits of the allocation cap set by the Budget Act and the available reserve. The ACPR's budget consists of all of its receipts and expenses, and is an annex to the budget of the Banque de France.

The ACPR relies on support functions provided by the Banque de France in order to benefit from the pooling of certain services (property management, IT, personnel management, etc.) whose costs are measured on the basis of the Banque de France's cost accounting model. Capital expenditure is incurred by the Banque de France, with the ACPR budget recording the associated depreciation and amortisation expenses.

1. BUDGET OF THE ACPR

The report on the ACPR budget outturn for 2024 was submitted to the Audit Committee on 3 March 2025 and approved by the College at its plenary meeting of 17 March 2025. The authority ended 2024 with a deficit of EUR 1.7 million. After taking into account this deficit, the balance of contributions carried forward totalled EUR 17.7 million.

1.1 2024 BUDGET OUTTURN

1.1.1 Income

The authority's income essentially comprises contributions for the cost of supervision payable by entities supervised by the ACPR.⁵⁴

⁵³ Articles L. 612-18 and L. 612-19 of the Monetary and Financial Code detail how the ACPR's budget works.

⁵⁴ Article L. 612-20 sets out the procedures for calculating contributions for the cost of supervision per category of contributing entity in force in 2024: for the banking sector, the rate applied to banks' capital requirements or minimum capital requirements was set at 0.66%, with a minimum contribution of EUR 500; for the insurance sector, the rate applied to written premiums and contributions was set at 0.23%, with a minimum contribution of EUR 500; flat-rate contributions were set at EUR 1,000 for money changers, EUR 500 for mutual insurers and unions referred to in Book I of the Mutual Insurance Code that manage mutual insurance payments and contracts on behalf of mutual insurance companies and unions referred to in Book II, and EUR 150 for insurance and reinsurance brokers and for intermediaries in banking transactions and payment services; the flat-rate contribution for crowdfunding intermediaries and non-profit associations was EUR 100. Finally, the flat-rate contribution for mixed financial holding companies and mixed parent undertakings of financing companies was set at EUR 5,000.

TABLE 1 – SUMMARY OF 2023 AND 2024 EXPENSES AND INCOME

Expenses and income in EUR million	2023	2024	Change
Contributions from supervised institutions (for information)	231.2	234.9	1.6%
Total income (A) taking into account the tax allocation cap	209.7	234.3	11.7%
Tax allocation cap	195.0	220.0	12.8%
Amount paid by Caisse des Dépôts et Consignations	10.0	10.0	0.0%
Other income	4.7	4.3	-8.2%
Total expenses (B)	231.7	236.0	1.9%
Personnel costs	134.0	138.2	3.1%
IT	35.0	34.2	-2.3%
Property	24.3	25.0	2.8%
Other expenses	28.5	28.2	-0.9%
Amortisation and depreciation	9.9	10.4	5.7%
Budget balance (A)-(B)	-22.0	-1.7	-92.3%
Available reserve at the end of the year	19.4	17.7	-8.7%

In 2024, total income taking into account the tax allocation cap amounted to EUR 234.3 million, up 11.7% on 2023.

- The main reason for this was the increase in the tax allocation cap in 2024 (from EUR 195 million in 2023 to EUR 220 million in 2024), with the surplus (EUR 14.2 million) being paid back to the general State budget. Contributions received in 2024 were up by just 1.6% compared with 2023. This rise was mainly due to the increase in premium income in 2023, which formed the basis to calculate the contributions paid by the insurance sector in 2024 (increase of 3.7%). The overall collection rate for contributions was steady at 99.4% in 2024.
- The amount paid by the Caisse des Dépôts et Consignations (CDC), which does not come under MFC Article L. 612-20, is included under other income received by the ACPR. It was set at EUR 10 million annually between 2020 and 2024 inclusive and will be raised to EUR 11 million from 2025.
- Other income includes reimbursement for services provided by the employees of the General Secretariat of the ACPR to the Banque de France in connection with the supervisory tasks assigned to the Bank, work on behalf of the *Comité consultatif de la législation and de la réglementation financières* (CCLRF – Advisory Committee on Financial Legislation and Regulation), as well as services provided to the AMF in connection with tasks performed on its behalf. Other income in 2024 also included interest earned over the year (EUR 0.8 million) on the amount of contributions carried forward (reserve), which earns interest at the rate paid on the main refinancing operations.⁵⁵

1.1.2 Expenses

Expenses in FY2024 came to EUR 236 million, an increase of 1.9% relative to 2023. This moderate increase was linked to the recognition of exceptional adjustments to amounts charged out by the Banque de France in 2024 in the amount of EUR 1.7 million (2.6% increase if the impact of the adjustments is stripped out).

Personnel costs climbed by 3.1% relative to 2023 and stood at EUR 138.2 million, chiefly owing to the volume effect. Because of significant hiring in 2023 (77% increase between 2021 and 2023), the average headcount rose from 1,065 in 2023 to 1,085 in 2024. This was mainly used to strengthen prudential oversight staffing in the banking and insurance sectors. In 2024, hiring was scaled back, with the aim of stabilising the headcount at an average of 1,080 FTE through careful management of new arrivals and departures. At 31 December 2024, the ACPR had 1,068.4 FTE employees.

Property expenses were up by 2.8% compared with FY 2023 owing to the increase in rents based on the ILAT index (index of rents for service-based activities), which rose by 3.76% year-on-year (data to Q3 2024).

The increase in amortisation and depreciation expenses recorded between 2023 and 2024 is the result of the ACPR's strong commitment, as the authority invests to maintain high-performance IT tools that will enable it to discharge its tasks effectively, especially in data collection and processing.

TABLE 2 – PERSONNEL BY MAJOR FUNCTION (AVERAGE FTE)

Average FTE	2023	2024	Change
Prudential oversight, banking sector	394	405	10
Prudential oversight, insurance sector	188	199	11
Supervision of business practices	81	85	4
AML/CTF	96	97	1
Cross-cutting risk analysis and inspection support	210	211	2
Steering and support	95	88	-8
Total	1,065	1,085	20

1.2 THREE-YEAR FORECASTS

The three-year forecasts cover FYs 2026 to 2028 and are projected in particular using the 2025 budget assumptions adopted by the plenary College, supplemented by the impact of renegotiating the lease for the building occupied by the SGACPR (March 2025). The forecasts cover income (contributions from supervised entities and other income), expenses (personnel costs, overheads, amortisation and depreciation) and the outturn (budget balance and reserve).

1.2.1 Income

For FY 2025, total projected contributions from supervised entities are up on 2024 and could reach EUR 239.9 million.

In the banking sector, the estimated contribution is based on the change in the contribution base (value of risk-weighted assets at end-2024). Based on these elements, contributions from the banking sector are forecast to increase by 2% compared with 2024. These prudent forecasts factor in previous developments and the uncertain economic environment.

The estimated contribution from insurance undertakings for FY 2025 is projected to increase by 2.5%, which is a prudent assumption based on the situation on the insurance market in 2024 and developments in the contribution base, which is made up of total life and non-life premium income earned over the year.

Specifically, life insurance contributions were higher than in 2023, as were net inflows.

For insurance and reinsurance brokers and intermediaries in banking transactions and payment services, the same overall contribution amount as in 2024 was retained for 2025 and is based on the number of these intermediaries registered in the ORIAS lists at 1 April 2024.

For FYs 2026 to 2028, prudent assumptions for the increase in contributions take account of previous developments along with the economic outlook and currently available data. A 2% increase was retained for the insurance sector. For the banking sector, a 3% rise was projected to capture a sharper increase in capital requirements, owing to the entry into application of the Basel III regulatory framework starting in 2025.

These estimates will naturally depend on changes in the economic environment in the coming years.

⁵⁵ From FY 2025 onwards, following a decision by the Governing Council on the procedures for sharing monetary income, the deposit facility rate will apply.

TABLE 3 – FORECAST CONTRIBUTIONS FROM SUPERVISED ENTITIES (EUR THOUSANDS)

Contributions (EUR thousands)	2024 Actual	2025 Budget	Forecasts 2026	Forecasts 2027	Forecasts 2028
Credit institutions and investment firms, MFHCs-MPUFCs*	157,910	161,067	165,899	170,876	176,002
Insurance undertakings (insurers, mutual insurers and provident institutions)	69,617	71,430	72,859	74,316	75,802
Intermediaries in banking transactions and payment services	3,357	3,373	3,373	3,373	3,373
Insurance and reinsurance brokers, microcredit associations and CIs**	3,774	3,781	3,781	3,781	3,781
Money changers	203	208	208	208	208
Total	234,861	239,859	246,120	252,554	259,166

* Mixed financial holding companies, mixed parent undertakings of financing companies.

** Crowdfunding intermediaries.

For intermediaries, the change in the contribution amount is hard to assess because most of the entities that make up the group are small. The decision has been taken to keep the 2025 population and amount for the entire three-year period. Since the flat-rate amount of these contributions is set by order, any change would entail a regulatory amendment.

The CDC's annual contribution will increase to EUR 11 million in 2025.⁵⁶ The same amount is used through to 2028 in the forecasts.

Other income corresponds mainly to services charged out to the Banque de France for supervisory work performed on its behalf by SGACPR staff. These receipts are calculated on the basis of a flat-rate amount that is based on actual costs observed in previous years. The forecast amount for 2025 is adjusted to reflect estimated inflation for the next three years (see below, point 1.2.2). Other income also includes remuneration of the reserve, which will end in 2027 unless the tax allocation cap is raised (see Table 7).

1.2.2 Expenses

The ACPR's expenses were estimated based on the following assumptions:

Inflation projections for 2026 and 2027 are based, unless otherwise indicated, on the data mentioned in the macroeconomic projections published by the Banque de France for 2025-2027 in December 2024.⁵⁷ For 2028, it was assumed that inflation would remain at 1.9%.

Expense forecasts between 2026 and 2028 are based on demanding assumptions that target, wherever possible, a below-inflation average increase in expenses and a stable headcount at 1,080 FTE. This baseline scenario for the three-year forecasts is therefore at the lower end of the range. A second scenario includes assumptions featuring larger changes.

TABLE 4 – FORECAST OTHER INCOME (IN EUR THOUSANDS)

Other income	2024 Actual	2025 Budget	Forecasts 2026	Forecasts 2027	Forecasts 2028
Amount paid by Caisse des Dépôts et Consignations	10,000	11,000	11,000	11,000	11,000
Other income	4,309	3,907	3,767	3,724	3,795
Total other income	14,309	14,907	14,767	14,724	14,795

KEY POINTS IN THE PROJECTION FOR FRANCE, ON AN AVERAGE ANNUAL BASIS

	2023	2024	2025	2026	2027
Real GDP	1.1	1.1	0.9	1.3	1.3
HICP	5.7	2.4	1.6	1.7	1.9
HICP excluding energy and food	4.0	2.4	2.2	1.9	1.8
Unemployment rate (ILO, entire country, % working population)	7.3	7.4	7.8	7.8	7.4

Data adjusted for working days. Annual growth rate unless otherwise indicated.

Sources: INSEE for 2023 (quarterly national accounts of 30 October 2024), Banque de France projections against beige background.

TABLE 5 – FORECAST EXPENSES (IN EUR THOUSANDS)

Expenses	2024 Actual*	2025 Budget**	Forecasts 2026	Forecasts 2027	Forecasts 2028
Personnel costs	138,153	142,127	145,680	149,322	153,055
Overheads	87,428	92,916	95,789	97,420	99,594
Amortisation and depreciation	10,426	10,142	7,980	8,067	7,536
Expenses for the year	236,007	245,186	249,449	254,809	260,185

* In 2024, overheads were reduced by EUR 1.7 million due to adjustments to amounts charged out by the Banque de France. Stripping out these non-recurring items, overheads were EUR 89.1 million.

** For 2025, the initial budget (EUR 247.6 million) voted by the plenary College was exceptionally updated to reflect the effects of the lease renegotiation, which provides for a rent holiday from 2025 to 2027.

The assumption for personnel costs is based on the average 1,080 FTE target set in accordance with the Banque de France's trajectory and is intended to enable the ACPR to fulfil its tasks and maintain its influence with French and European institutions. Careful management of new arrivals and departures will be conducted to keep the headcount steady in 2025 and following years at around 1,080 FTE, which is an ambitious goal, considering the many new supervisory tasks and areas that will be entrusted to the ACPR between 2025 and 2027. They include digital resilience (DORA), crypto-assets (MiCA), and market surveillance of artificial intelligence use in the financial sector (AI Act), integration of climate transition plans in prudential regulations, the new European recovery and resolution regime applicable to insurers, and establishment of the new European anti-laundering authority (AMLA), all of which will entail new skills and an increased workload. To perform these new tasks properly while maintaining adequate supervisory quality in existing areas of activity, the ACPR is stepping up its risk-based supervisory approach, while streamlining and rationalising processes in order to boost its efficiency, so that it can carry out these new activities with the same number of employees. All ACPR personnel are called on to play their part in this demanding approach. Employee assignment to these various tasks is thus set to change, consistent with the priorities of the ACPR's work programme (see details in the section entitled "Our work programme").

For FY 2025, based on a central scenario featuring an average annual forecast headcount of 1,080 FTE, **personnel costs** are budgeted at EUR 142.1 million, applying the scales used to project Banque de France personnel costs.

For FYs 2026-2028, factoring in assumptions that the headcount will remain steady at around 1,080 FTE, Banque de France inflation forecasts and wage increase mechanisms (age and job skill coefficient), personnel costs could rise to EUR 145.7 million in 2026, EUR 149.3 million in 2027 and EUR 153.1 million in 2028.

Overheads include services provided by the Banque de France to the ACPR, which are either billed at their actual cost or charged out based on the Banque de France's cost-accounting model, and expenses that are directly incurred by the ACPR. They are divided as indicated below.

The Banque de France's inflation projections (1.7% in 2026 and 1.9% annually in 2027 and 2028) are a significant guide to the change in overheads and are used in the absence of assumptions to the contrary. On average, however, overheads are set to increase at below the pace of inflation, owing to continued efforts to control spending forecast for the next three years.

⁵⁶ [Order of 4 December 2024 amending the Order of 10 June 2020 establishing the procedures and amount of the contribution provided for in Article L. 518-15-2 of the Monetary and Financial Code.](#)

⁵⁷ [Macroeconomic projections](#) on the Banque de France's website.

TABLE 6 – FORECAST OVERHEADS (IN EUR THOUSANDS)

Overheads managed by the ACPR	2024 Actual	Budget 2025	Forecasts 2026	Forecasts 2027	Forecasts 2028
IT*	34,181	39,268	39,706	40,148	40,596
Property (rents, rental expenses)	25,003	23,839	25,825	26,484	27,558
Other charging out of BDF services (excluding IT and property)	17,747	18,554	18,869	19,228	19,593
Overheads incurred directly by the ACPR (excluding IT)	10,498	11,255	11,389	11,560	11,846
Total overheads	87,428	92,916	95,789	97,420	99,594

* In 2024, after stripping out the impact of exceptional adjustments to amounts charged out by the Banque de France, IT spending totalled EUR 35.3 million and property spending stood at EUR 25.6 million.

The Bank bills the ACPR for **property expenses** (rents and rental expenses) at their actual cost. Renegotiating the lease for the main building will lead to a decrease in overheads due to a EUR 5 million rent holiday over the 2025-2027 period, followed by a EUR 4 million increase annually from 2028 onwards. In 2028, the project to convert the offices into shared spaces will see all ACPR departments housed in a single building from end-2027 and keep the increase in property costs to EUR 1 million relative to 2027, by saving on the cost of a second rent.

IT expenses include costs relating to the maintenance of IT applications, the costs of services carried out by the Banque de France for the ACPR, and charges by the European Central Bank (ECB) for IT resources provided to national supervisory authorities within the framework of the SSM. The amounts charged out for 2025 are based on actual costs in 2023, which have been adjusted, and take into account the authority's needs in terms of the IT services and technical infrastructure required for project and application development.

Excluding unknown elements linked notably to the need to engage in new projects to take advantage of technological developments, overall IT costs are expected to show controlled growth of 1.1% annually for FYs 2026-2028.

This growth is chiefly attributable to the operating expenses associated with an upgraded information system. Following the establishment of a functional collection system, an analytics component for the platform set up to harness the regulatory data available to the ACPR is due to come onstream in 2026. The portal for electronic exchanges with supervised entities (ACPR portal) came online at the end of 2024. In the

coming years, alongside the overhaul of the register that records financial agents operating in France (REGAFI) and necessary steps to adapt the IT system to accommodate regulatory reforms affecting the financial sector, projects will seek to enhance the effectiveness of supervisory tools, harness artificial intelligence and take advantage of innovation more broadly.

The ACPR will also pursue efforts to control **overheads that it incurs directly** (excluding IT). These direct expenses totalled EUR 10.5 million in 2024 and are expected to reach EUR 11.3 million in 2025, before settling in the following years at below EUR 12 million.

The ACPR will therefore continue to pay close attention to inspection expenses and to the environmental footprint of staff travel. The carbon budget allocated to the SGACPR in 2024 was respected, and the 2025 ceiling is lower than that set for 2024 (see CSR section). Inspection expenses are estimated to decrease in 2026-2028 compared with 2025.

Forecasts for contributions to the operation of the two European sector authorities (EBA and EIOPA), which have risen significantly in recent years, are based on the agencies' three-year projections, which expect an increase in operating budgets to allow them to discharge their tasks.

Billing for the IT resources made available to national supervisory authorities under the SSM is estimated to keep pace with inflation.

Other overheads incurred directly by the ACPR include spending on documentation, publications and public relations.

Amortisation and depreciation expenses (see Table 5) have increased sharply since 2021 as several major IT projects have gone live. Total amortisation and depreciation expenses in 2024-2025 are forecast to be around EUR 10 million, but should ease from 2026 onwards owing to the end of the amortisation period for the first two batches of the platform set up to harness regulatory data. Amortisation and depreciation relating to the project to set up shared offices are recognised in annual amortisation and depreciation expenses from 2028.

1.2.3 Change in the budget balance and reserve

The following table summarises the overall change in income and expenses, and in the resulting budget balance, for the 2025-2028 period. The tax allocation cap is kept the same in the assumptions presented below.

After recognising a deficit of EUR 1.7 million for 2024, at 31 December 2024 the balance of contributions carried forward (reserve) stood at EUR 17.7 million. Meanwhile, EUR 14.2 million in respect of excess amounts received was paid back to the State. The increase in the tax

allocation cap in 2024 to EUR 220 million limited the deficits in 2024 and 2025 but will not be enough to cover those of following years.

Estimated expenses for **FY 2025**, updated to recognise the effects of the lease renegotiation, indicate an increase in operating expenses due in particular to non-recurring reductions in 2024 overheads (adjustment of amounts charged out by the Banque de France, specific cost-savings programme). Given the EUR 220 million tax allocation cap and including the CDC's EUR 11 million contribution and "other income", the balance in 2025 is expected to show a **EUR 10.3 million** deficit.

Estimated expenses for 2026 to 2028 reflect, overall, continued efforts to control costs (1.7% increase in 2026, 2.1% in 2027 and 2028). The contained growth of these expenses especially reflects efforts relating to overheads (controlled increase in IT and property expenses) as well as personnel costs (headcount to decrease slightly in 2025 before stabilising, notwithstanding the fact that the new tasks entrusted to the ACPR will necessarily entail significant staff reassignments), while amortisation and depreciation expenses are projected to fall from 2026 onwards.

TABLE 7 – SUMMARY OF EXPENSES AND INCOME (IN EUR THOUSANDS)

Expenses and income	2024 Actual	2025 Budget	Forecasts 2026	Forecasts 2027	Forecasts 2028
Contributions from supervised institutions	234,861	239,859	246,120	252,554	259,166
Tax allocation cap	220,000	220,000	220,000	220,000	220,000
Caisse des Dépôts et Consignations	10,000	11,000	11,000	11,000	11,000
Other income	4,309	3,907	3,767	3,724	3,795
Income (A) taking into account the tax allocation cap	234,309	234,907	234,767	234,724	234,795
Personnel costs	138,153	142,127	145,680	149,322	153,055
Overheads	87,428	92,916	95,789	97,420	99,594
Amortisation and depreciation	10,426	10,142	7,980	8,067	7,536
Expenses for the year (B)	236,007	245,186	249,449	254,809	260,185
Budget balance (A)-(B)	-1,698	-10,279	-14,681	-20,084	-25,391
Reserve	17,734	7,455	-7,227	-27,311	-52,702
Paid back to the Treasury*	14,214	19,859	26,120	32,554	39,166

* Theoretical amount from 2025.

Although expenses for FYs 2026 to 2028 are estimated to increase by a small amount, the unchanged tax allocation cap of EUR 220 million will not be enough to ensure that the ACPR is funded in keeping with the principal of financial independence set out in Article L. 612-18 of the Monetary and Financial Code and to have a safety reserve, estimated at approximately EUR 5 million from 2026. For that to be the case, **the cap needs to be raised** to EUR 233 million in 2026, EUR 240 million in 2027 and EUR 245 million in 2028. The excess amount paid back to the Treasury would remain above EUR 10 million.

Sensitivity analysis (1% increase in expenses)

The baseline scenario presented here includes particularly ambitious cost control assumptions; for this reason, it makes sense to analyse the sensitivity of the 2026-2028 projections to an increase in variable expenses (personnel costs and overheads) of more than one point relative to the baseline scenario's assumptions, especially for inflation. IT expenditures could be affected by technological developments, especially in artificial intelligence, or by changes made necessary by the regularly widening scope of the ACPR's duties and the increasing complexity of these tasks, in order to keep its headcount steady overall. Personnel expenditures could also be affected by the need for hard-to-find expert skills. A trajectory such as this would still require measures to rationalise the information system and careful management of the headcount, just as in the baseline scenario.

In this alternate scenario, expenses would total EUR 251.8 million in 2026, EUR 259.6 million in 2027 and EUR 267.5 million in 2028. To ensure balance (income greater than expenses), the tax allocation cap would need to be raised to EUR 235 million in 2026, EUR 245 million in 2027 and EUR 252 million in 2028. The amount paid back to the Treasury would remain above EUR 7 million overall in this scenario.

2. ACTIVITY AND PERFORMANCE INDICATORS

The ACPR uses a series of indicators to assess the authority's activities in carrying out its tasks. These activity and performance indicators are grouped here according to the ACPR's broad tasks, namely: conduct risk-adjusted prudential supervision, oversee proper application by the financial sector of AML/CTF measures, protect customers, resolve and prevent crises, participate in European and international supervisory harmonisation, and participate in the response to new challenges. They are commented on in the previous chapters of this report.

2.1 PRUDENTIAL SUPERVISION

The prudential supervision indicators cover execution of the inspection programme and the activity of the Supervisory Colleges. Chapter 2 of this report covers the main challenges and characteristics of prudential supervision in 2024.

2.1.1 Inspection programme

The initially planned on-site inspection programme was executed in 2024. Of the 214 inspections begun, 78 were completed over the year, since inspection starts are staggered across the whole year and inspections may last several months (averaging nine). The 136 inspections remaining from 2024 will be completed in the following year. In addition, 139 inspections started in previous years were completed over the course of 2024.

A total of 48 prudential inspections in the banking sector were scheduled in the 2024 programme, including 36 for the ECB at significant institutions. In addition to the 46 inspections begun in 2024, 14 inspections were done at institutions doing business in France but were led by head inspectors from the ECB or other national supervisory authorities and involved staff from the ACPR's Delegation for On-site Inspections.

EXECUTION OF THE ON-SITE INSPECTION PROGRAMME

	2024				2025	
	Initial Programme	Additional programme	Cancelled	Begun	Of which completed	Initial programme
Number of inspections	211	27	16	214	78	184
Prudential, banking sector	48	0	2	46	13	55
SSM-SI	36	0	2	34	6	39
SSM-LSI / Non-SSM	12	0	0	12	7	26
Prudential, insurance sector	45	4	7	42	15	36
AML/CTF	30	13	1	35	8	22
Business practices	88	10	6	91	42	71



Clarification

The on-inspection programme comprises, for the current year, the initial programme plus additional inspections, less cancelled inspections (e.g. replaced by an additional inspection or cancelled outright due to circumstances); inspections described as “begun” are inspections that were effectively launched during the year. In the annual programme, “completed” inspections are inspections that were concluded within the same year (final report sent to the supervised institution), on the understanding that

inspections may start at any time, including at the end of the year, and last several months. Accordingly, only a proportion of the inspections “begun” during a year may be “completed” within that same year.

The table above deals solely with 2024.

Source: Data from SGACPR indicators, extracted from the application used to track execution of inspection programmes.

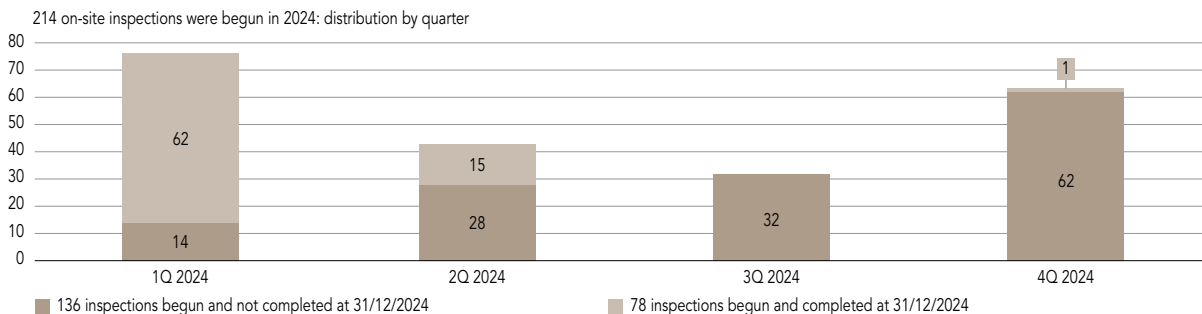
Whereas 30 on-site AML/CTF inspections were scheduled for 2024, 35 were begun. The ACPR also carried out two inspections in 2024 that covered AML/CTF as well as prudential aspects and were recorded under prudential inspections for the banking sector.

Overall, the initial on-site inspection programme for 2025 is smaller than in 2024, based on the feedback

from 2024, when 214 inspections were initiated. The adjustment also reflects the new tasks assigned to the ACPR and that will affect its workload.

At this stage, the initial 2025 inspection programme of 22 AML/CTF inspections does not include the overseas inspections to be conducted in 2025 (discussions are underway with the IEDOM on which entities to inspect).

On-site inspections begun and completed in 2024



NUMBER OF CORRECTIVE-MEASURE REQUESTS IN 2024

Number of corrective-measure requests	2024
Number of corrective-measure requests issued	765
Number of corrective-measure requests closed	892

ACPR departments write to every supervised entity that has been the subject of an on-site inspection with a list of corrective-measure requests for problems encountered during the inspection. These requests are assigned an implementation deadline and are closely tracked by the ACPR. Closed requests many have been issued in previous years.

2.1.2 Tracking the activity of the Supervisory Colleges

Supervisory Colleges strengthen the supervision of cross-border groups by enabling deeper information exchanges between competent authorities, including those responsible for supervising significant branches. European supervisors may decide, within this framework, to implement coordinated measures, such as joint on-site inspections. Each college meeting entails a considerable amount of work and

exchanges for the ACPR in the lead-up period, and several preparatory meetings have to be organised, representing a significant workload for staff of the affected supervisory departments.

In 2024, more than 60 meetings of prudential Supervisory Colleges and 92 meetings of AML/CTF Colleges were held. The ACPR organised 71 meetings directly, in its capacity as the supervisory authority for the group's lead entity (Home college). The increase in the number of meetings of Supervisory Colleges in the insurance sector between 2023 and 2024 was due to specific meetings to approve the internal model of a major insurance group. In addition, the ACPR belongs to several Supervisory Colleges for central counterparties, alongside the Banque de France and the AMF (notably those responsible for Eurex and LCH). In 2024, the ACPR participated in 18 of these college meetings.

NUMBER OF MEETINGS OF PRUDENTIAL SUPERVISORY COLLEGES

		2023	2024
Total Banks		4	8
Banking	Organised by the ACPR (Home college)	1	1
	Organised by other supervisory authorities (Host college)	3	7
Total Insurers		43	56
Insurance	Organised by the ACPR (Home college)	24	35
	Organised by other supervisory authorities (Host college)	19	21

NUMBER OF AML/CTF SUPERVISORY COLLEGE MEETINGS

		2023	2024
	Total Banks	98	87
Banking	Organised by the ACPR (Home college)	32	30
	Organised by other supervisory authorities (Host college)	66	57
	Total Insurers	6	5
Insurance	Organised by the ACPR (Home college)	5	5
	Organised by other supervisory authorities (Host college)	1	0
↓			

Clarification

The Supervisory Colleges are standing bodies for cooperation and coordination among the supervisory authorities of the main entities that make up a banking or insurance group, with a view to facilitating supervision on a consolidated basis.

A college is required to be set up for groups with at least one subsidiary in a Member State other than that where the parent company has its headquarters:

- *Home college: the parent company is headquartered in France. The ACPR coordinates the college as the supervisory authority for the group's lead entity;*

- *Host college: the parent company is headquartered in the EU outside France and has at least one subsidiary in France. The ACPR sits on the college as the supervisory authority for an EU subsidiary. The colleges led by the ECB are counted under host colleges.*

Source: Data taken from SGACPR indicators its headquarters; and gathered from supervisory directorates.

2.2 AUTHORISATIONS

Chapter 1 on financial sector developments details the ACPR's licensing and authorisation activities.

	2023	2024
Banks licensed	657	657
Insurance companies and mutual insurers licensed	660	639

2.3 ACPR INVOLVEMENT IN EFFORTS TO ADAPT THE REGULATORY FRAMEWORK AND IN INTERNATIONAL WORK

2.3.1 Relations with financial centre participants

The ACPR’s publications inform people working in the insurance and banking sectors, along with the general public, about developments in the sectors (through recurring annual or semi-annual publications) or about themes linked to topical issues. In 2024, the ACPR published two studies in the *Débats économiques et financiers* series. The first dealt with insurance supervision under climate change, while the second covered the use by banks of artificial intelligence when designing internal models to calculate regulatory capital.

The ACPR also organises academic conferences and research seminars to present the work of invited

researchers or ACPR members. It finances the ACPR Chair, an initiative supporting research into regulation and systemic risk, whose main tasks are to organise research activities, facilitate contacts between the academic world and the ACPR, and develop an internationally-open centre for discussion and ideas focused on the management of systemic risk. In 2024, ten monthly seminars were organised through this initiative. A *Débats économiques et financiers* research seminar was also organised to present a research paper by an ACPR staffmember on the specific qualities of the loan solutions offered by mutual banks to non-financial corporations.

PRUDENTIAL SUPERVISION

		2023	2024
	Conferences and seminars	12	11
	Publications	16	13
<i>Analyses et synthèses, Débats économiques et financiers series</i>	<i>Banking</i>	5	4
	<i>Insurance</i>	8	8
Other publications on the ACPR web-site	<i>Banking</i>	3	1
	<i>Insurance</i>	0	0
Notices	<i>Banking</i>	2	2
	<i>Insurance</i>	6	2

AML/CTF

	2023	2024
Publications on the website on AML/CTF topics	2	0

BUSINESS PRACTICES

	2023	2024
Publications on the ACPR website	12	3
Warnings and press releases on the ABEIS website	18	13
Number of blacklisted websites or entities	5,167	6,455
Number of advertisements checked – <i>Banking</i>	1,281	1,111
Number of advertisements checked – <i>Insurance</i>	937	813

Efforts to prevent scams continued in 2024 and resulted, among other things, in additions to the ACPR's blacklist ⁵⁸ of websites without authorisation to offer loans, savings passbooks, payment services or insurance contracts. In 2024, 1,288 addresses were added, bringing the number of unauthorised sites to 6,455.

The ACPR continued to monitor advertising communications, analysing over 800 life insurance advertisements in 2024 and more than 1,100 in the banking sector.

It published a press release warning the public about fraudulent offers of loans, savings.

SUSTAINABLE FINANCE

	2023	2024
Number of publications and research papers	2	6

In terms of sustainable finance, in 2024 the ACPR published an analysis of the main findings of the climate stress test exercise covering the insurance sector, which was launched in 2023. The ACPR and the AMF published their fourth joint report on monitoring

and assessing the climate commitments of members of the financial centre. An article was also published in *The Journal of Economic Surveys* on the effects of climate change-related risks on banks.

RESOLUTION

	2023	2024
Number of publications	3	2
Number of notices	1	1
Number of meetings, Banking sector	112	114
Number of meetings, Insurance sector	14	18

In the banking sector, meetings organised in 2024 included workshops, in-depth work by ongoing supervision teams on specific aspects, senior management meetings (SMMs) and high-level meetings (HLMs), and were attended by representatives from the Single Resolution Board (SRB), affected banks and the ACPR. Meetings in the insurance sector were held between insurance undertakings and the ACPR.

In 2024, the ACPR published two papers on resolution on its website, entitled "La réorganisation des activités après un renflouement interne : une analyse de la préparation des grands groupes français" and "La mise en œuvre du renflouement interne (*bail-in*)".

⁵⁸ [Authority blacklists](#) on the Assurance Banque InfoService website.

2.3.2 Participate in European and international supervisory harmonisation

The ACPR's involvement in international working groups is detailed in point 3 of Chapter 2. It was another busy year in this regard in 2024. The change between 2023 and 2024 shown in the table reflects a methodological adjustment in terms of how

international working groups are counted. In 2023, all working groups were included. From 2024, for the sake of simplicity, only lead groups and groups that report directly to them are counted.

Number of working groups and committees in which the ACPR participates	2023	2024
International bodies (BCBS, BIS, Fed, FSB, IAIS)	101	25
European agencies (EBA, EC, ECB, EIOPA, SRB, ECB-SSM)	284	105

2.3.3 Number of ACPR employees holding positions at European or international institutions

	2023	2024
International bodies (BIS, BCBS and IAIS)		
Number of seconded employees	7	9
Holding key positions	4	3
European agencies (EBA, EIOPA, ESMA, etc.)		
Number of seconded employees	35	34
Holding key positions	4	5
European Banking Union (ECB-SSM and SRM)		
Number of seconded employees	94	91
Holding key positions	7	8

2.4 RESOLUTION

NUMBER OF RESOLUTION PLANS ADOPTED

	Banking SI		Banking LSI		Insurance		CCP	
	2024	2025	2024	2025	2024	2025	2024	2025
Planned number of resolution plans	14	13	4	41	15	8	1	1
Number of resolution plans adopted	14		4		9		1	

In the banking sector, 14 resolution plans planned for significant institutions were adopted. 13 resolution plans are planned for 2025. The small number of LSI plans adopted in 2024 is due to the fact that the vast majority of these entities are subject to simplified obligations, so resolution plans need to be prepared only every four years. Since these entities are dealt with in sequenced cycles organised by category, once every four years there is an "empty year", when only

entities that are not eligible for simplified obligations are covered.

In the case of insurers, out of the 15 resolution plans planned for 2024, just nine were adopted. Following the late reception of preventive recovery plans, which are critical to drafting preventive resolution plans, the six other plans were postponed. A resolution plan planned for CCPs was adopted.

2.5 GOVERNANCE

NUMBER OF SUPERVISORY COLLEGE MEETINGS

	2023	2024
Number of Supervisory College meetings	37	35

NUMBER OF SANCTIONS COMMITTEE MEETINGS

	2023	2024
Number of Sanctions Committee meetings	9	6

NUMBER OF RESOLUTION COLLEGE MEETINGS

	2023	2024
Number of Resolution College meetings	4	4

NUMBER OF MEETINGS BY CONSULTATIVE COMMISSIONS

	2023	2024
Meetings of the Consultative Commission on Prudential Affairs	4	4
Meetings of the AML/CTF Consultative Commission	4	5
Meetings of the Consultative Commission on Business Practices	4	4
Meetings of the Consultative Commission on Climate and Sustainable Finance	4	5

2.6 COMMUNICATION

	2023	2024
Marketwide events	10	17
Press conferences	5	5
Press releases	20	27
Media requests	250	300
LinkedIn members	120,000	130,000
Subscribers to the <i>ACPR Review</i> external newsletter	3,000	3,500
Number of visits to the ACPR website		Over 1.5 million

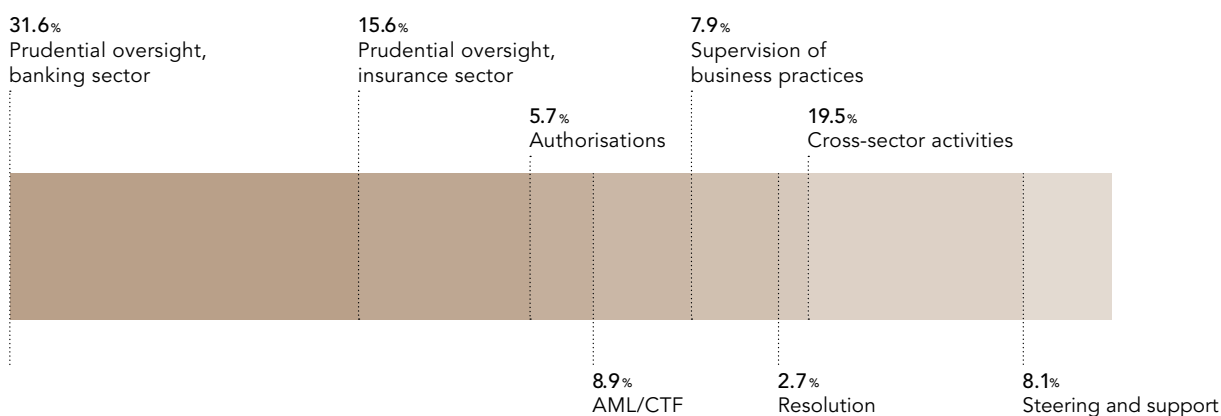
2.7 ACPR CROSS-CUTTING FUNCTIONS

2.7.1 HR data (gross headcount)

	2023	2024
Distribution of headcount:	1,128	1,103
Women	555	557
Men	573	546
Distribution of managers:	128	133
Women	52	59
Men	76	74

	2023	2024
Hiring:	126	45
Permanent	38	13
On contract	85	28
Fixed-term contract	3	4

2.7.2 HR data (average FTE 2024, by major category)



2.7.3 IT data

	2023	2024
Documents submitted to the online data exchange portal:		
• By supervised entities: number of statistical, prudential or regulatory documents	86,300	86,927
• By the ACPR:		
– number of lists of documents to be provided by supervised entities within the required timeframe	17,856	15,168
– number of reminders	13,986	9,774

2.7.4 Innovation

FINTECH	2023	2024
Meetings of the Fintech Forum and its working groups	8	13
Industry/Forum gatherings attended, including webinars	45	42
Number of publications relating to financial innovation	6	4
Number of meetings with innovators	157	146

Analyses published in 2024 addressed several themes, including: the rise of big tech in the financial sector, with an examination of the risks and possible regulatory responses; the collateral effects arising from the role of fintechs in financing small and medium-sized enterprises; and the promises and challenges of blockchain. ●

ACRONYMS USED

ABEIS	<i>Assurance Banque Épargne Info Service</i>	DGCCRF	<i>Direction générale de la concurrence, de la consommation and de la répression des fraudes</i> (Directorate General for Competition Policy, Consumer Affairs and Fraud Control)
ACPR	<i>Autorité de contrôle prudentiel et de résolution</i> (Prudential Supervision and Resolution Authority)	DGT	Directorate General of the Treasury
AMF	<i>Autorité des marchés financiers</i> (Financial Markets Authority)	DORA	Digital Operational Resilience Act
AMLA	Anti-Money Laundering Authority	EBA	European Banking Authority
AML/CTF	Anti-money laundering and counter-terrorist financing	ECB	European Central Bank
ANSSI	<i>Agence nationale de la sécurité des systèmes d'information</i> (National Cybersecurity Agency)	EEA	European Economic Area
API	Application Programming Interface	EFRAG	European Financial Reporting Advisory Group
ARCEP	<i>Autorité de régulation des communications électroniques, des postes et de la distribution de la presse</i> (Regulatory Authority for Electronic Communication, Postal Services and Print Media Distribution)	eiDAS	Electronic Identification And Trust Services
ASF	<i>Association française des sociétés financières</i> (French Association of Financial Companies)	EIOPA	European Insurance and Occupational Pensions Authority
BDF	Banque de France	EMIR	European Market Infrastructure Regulation
CASP	Crypto-asset service provider	ESRB	European Systemic Risk Board
CCP	Central CounterParty	FATF	Financial Action Task Force
CII	Credit and investment institution	FBF	<i>Fédération bancaire française</i> (French Banking Federation)
COLB	<i>Conseil d'Orientation de la lutte contre le blanchiment des capitaux et le financement du terrorisme</i> (France's AML/CTF Advisory Committee)	FCT	<i>Fonds commun de titrisation</i> (Securitisation fund)
COREP	COmmon solvency ratio REPorting	FINREP	FINancial REPorting
CRD	Capital Requirements Directive	Fintech	Financial technology
CRR	Capital Requirements Regulation	FRTB	Fundamental Review of the Trading Book
CSRBB	Credit Spread Risk in the Banking Book	FSB	Financial Stability Board
CSRD	Corporate Sustainability Reporting Directive	HCSF	<i>Haut conseil de stabilité financière</i> (High Council for Financial Stability)
DASP	Digital asset service provider	IAIS	International Association of Insurance Supervisors
		IFRS	International Financial Reporting Standards
		IMAS	Information Management System (IT tool used by the SSM to formalise the annual assessment of banks)
		IORP	Institution For Occupational Retirement Provision

IPCC	Intergovernmental Panel on Climate Change	ORIAS	<i>Organisme pour le registre unique des intermédiaires en assurance, banque et finance</i> (France's national insurance, banking and finance intermediary register)
IRRBB	Interest Rate Risk in the Banking Book		
IRRD	Insurance Recovery and Resolution Directive	ORSA	Own Risk and Solvency Assessment
ISSB	International Sustainability Standards Board	PACTE	<i>Plan d'action pour la croissance et la transformation des entreprises</i> (Action Plan for Business Growth and Transformation)
JST	Joint Supervisory Team		
LCR	Liquidity Coverage Ratio	SFDR	Sustainable Finance Disclosure Regulation
LSI	Less Significant Institution	SI	Significant Institution
MiCA	Markets in Crypto-Assets	SNCI	Small and Non Complex Institution
MREL	Minimum Requirement for Own Funds and Eligible Liabilities	SRB	Single Resolution Board
NGFS	Network for Greening the Financial System	SSM	Single Supervisory Mechanism
NRA	National Resolution Authority	Suptech	Supervisory Technology

ANNEX 1: DECISIONS TAKEN BY THE SUPERVISORY COLLEGE CONCERNING INDIVIDUAL ENTITIES IN 2024

	TOTAL	of which	BANKING SECTOR	INSURANCE SECTOR
Supervision (monitoring of prudential ratios, exemptions)	25		5	20
Administrative enforcement measures	18		9	9
Warning	0		0	0
Formal notice (issued by the Chairman acting under delegated authority)	11		6	5
Request for recovery programme	2		0	2
Placement under special supervision	0		0	0
Limitation of activity	2		2	0
Placement under provisional administration	0		0	0
Reappointment of a provisional administrator	2		0	2
Other				
Temporary ban on engaging in certain transactions maintained until satisfaction of conditions precedent	1		1	0
Other binding measures	90		88	2
Additional capital requirement	73		73	0
Specific liquidity requirement	14		14	0
Request for short-term funding plan	0		0	0
Injunction with coercive fines	0		0	0
Appointment of a liquidator	1		1	0
Other binding measures				
1/ Request for clarification about the content of actions taken and their outcomes to verify compliance by an effective manager with fit and proper requirements	2		0	2
2/ Confirmation of an additional governance-related capital requirement measure				
Initiation of disciplinary proceedings	6		6	0
Other measures concerning individual entities (including prudential exemptions and measures relating to preventive recovery plans)	189		146	43
Total decisions concerning individual entities	328		254	74
Number of appeals referred to the Conseil d'État against Supervisory College decisions	6		3	3

ANNEX 2: LIST OF DECISIONS ON GENERAL ISSUES ADOPTED IN 2024 BY THE SUPERVISORY COLLEGE OF THE ACPR

INSTRUCTIONS

Instruction 2024-I-01	Repealing and replacing Instruction 2022-I-24 of 14 December 2022 on the annual documents to be provided by insurance undertakings and undertakings for supplementary occupational retirement provision subject to the provisions of Article 29 of Energy and Climate Act No. 2019-1147 and the provisions of Article 4 of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector.
Instruction 2024-I-02	Repealing and replacing Instruction 2023-I-03 of 13 April 2023 on the annual prudential documents to be provided by institutions that are subject to ACPR supervision, that fall outside the scope of the "Solvency II" regime and that are not undertakings for supplementary occupational retirement provision, amended by Instruction 2021-I-12 of 15 October 2021.
Instruction 2024-I-03	On licence applications and disclosures by credit servicers amended by Instruction 2024-I-13 of 24 October 2024.
Instruction 2024-I-04	On the appointment or reappointment of an effective manager or a member of a supervisory body.
Instruction 2024-I-05	On licence withdrawal, authorisation and registration of financing companies, third-party financing companies, investment firms, payment institutions, account information service providers, electronic money institutions and credit servicers amended by Instruction 2024-I-13 of 24 October 2024.
Instruction 2024-I-06	On the new prudential reports by credit servicers, credit institutions, third-country branches, financing companies and credit purchasers.
Instruction 2024-I-07	On the prudential requirements applicable to financing companies repealing and replacing Instruction 2014-I-10 of 22 August 2014, with a view to extending to financing companies disclosure requirements for the supervision of interest rate risk in the banking book.
Instruction 2024-I-08	On information to be submitted to the ACPR in connection with the acquisition or extension of an ownership interest in an issuer of asset-referenced tokens.
Instruction 2024-I-09	On licence withdrawal, authorisation and registration of credit institutions, financing companies, third-party financing companies, investment firms, payment institutions, account information service providers, electronic money institutions and issuers of asset-referenced tokens.
Instruction 2024-I-10	On the appointment or reappointment of an effective manager or a member of a supervisory body amended by Instruction 2024-I-13 of 24 October 2024.

Instruction 2024-I-11	On exchanges between the ACPR and insurance undertakings, reinsurance undertakings as well as undertakings for supplementary occupational retirement provision amending Instructions 2015-I-04 of 29 May 2015, 2015-I-05 of 29 May 2015, 2015-I-06 of 29 May 2015, 2015-I-07 of 29 May 2015, 2015-I-12 of 21 April 2015, 2015-I-15 of 30 June 2015, 2015-I-17 of 30 June 2015, 2015-I-27 of 17 December 2015, 2015-I-28 of 17 December 2015, 2015-I-34 of 17 December 2015, 2016-I-02 of 14 January 2016, 2016-I-06 of 11 March 2016, 2017-I-07 of 19 July 2017, 2017-I-20 of 23 November 2017, 2018-I-13 of 11 July 2018, 2019-I-06 of 15 March 2019, 2022-I-25 of 14 December 2022 and 2022-I-26 of 14 December 2022.
Instruction 2024-I-12	On the communication by certain reporting institutions of their international Legal Entity identifier to the ACPR and repealing instruction 2013-I-16.
Instruction 2024-I-13	On exchanges between the ACPR and banking sector institutions and undertakings amending Instructions 2012-I-01 of 11 April 2012, 2013-I-09 of 12 July 2013, 2013-I-13 of 12 November 2013, 2013-I-16 of 12 December 2013, 2014-I-04 of 3 March 2014, 2014-I-05 of 2 June 2014, 2015-I-09 of 2 March 2015, 2017-I-05 of 6 March 2017, 2017-I-23 of 21 December 2017, 2019-I-01 of 20 February 2019, 2019-I-22 of 23 April 2019, 2023-I-19 of 23 October 2023, 2024-I-03 of 19 April 2024, 2024-I-05 of 19 April 2024, 2024-I-09 of 21 June 2024 and 2024-I-10 of 21 June 2024.
Instruction 2024-I-14	On the comparative assessment of diversity practices, including diversity policies and the gender wage gap, under Directive 2013/36/EU and Directive 2019/2031/EU.
Instruction 2024-I-15	On information to be submitted to the ACPR on statutory auditors, replacing Instruction 2016-I-07 of 11 March 2016 (amended).
Instruction 2024-I-16	On licence withdrawal, authorisation and registration of financing companies, third-party financing companies, investment firms, payment institutions, account information service providers, electronic money institutions, credit servicers or issuers of asset-referenced tokens replacing Instruction 2024-I-05 and Instruction 2024-I-09.
Instruction 2024-I-17	On setting up the unified reporting system for banks and equivalents, replacing Instruction 2023-I-15 of 23 October 2023.
Instruction 2024-I-18	On prudential reports by credit purchasers replacing Instruction 2024-I-06 of 19 April 2024 on the prudential reports of credit servicers, credit institutions, third-country branches, financing companies and credit purchasers.

RECOMMENDATIONS

1. **Recommendation 2024-R-01 of 28 June 2024** on the implementation of certain provisions arising from Insurance Distribution Directive (EU) 2016/97.
2. **Recommendation 2024-R-02 of 2 July 2024** on complaints handling.
3. **Recommendation 2024-R-03 of 21 November 2024** on gathering customer information in the framework of the duty to provide advice and a personalised recommendation service in life insurance.

NOTICES

2024 Notice on the procedures for calculating and disclosing prudential ratios under CRDIV and MREL (version of 28 June 2024).

2024 Notice on the procedures for calculating and disclosing prudential ratios under CRDIV and MREL (version of 30 December 2024).

Notice describing the framework for the management of ICT-related risks within the meaning of European Regulation No. 2022/2554 of 14 December 2022 on the digital operational resilience of the financial sector (DORA).

Notice on the communication of information to the supervisory authority and to the public (RSR/SFCR) for insurance companies and groups subject to the Solvency II Directive.

POSITIONS

ACPR Position 2024-P-01 on placement without a firm commitment, investment advice and business advice on capital structure, industrial strategy, mergers and corporate takeovers.

SECTOR ENFORCEMENT PRINCIPLES

Joint sector enforcement principles by the ACPR and DGDDI on transactions in gold and other precious metals.

DECISIONS

Decision 2024-C-18 of 12 June 2024 on treating exposures to regional governments or local authorities as exposures to the central government under Article 115(2) of Regulation (EU) No. 575/2013 of the European Parliament and of the Council of 26 June 2013.

ANNEX 3: CSR AT THE ACPR: COLLABORATIVE AND CARING INITIATIVES

COURSE DES FOULÉES DE L'ASSURANCE CHARITY RUN

In March 2024, around 90 ACPR employees participated in Foulées de l'Assurance, a charity run organised by the insurance sector. The ACPR took first place in the 10 km race in the Institutions category. A total of EUR 33,940 was raised for ADICARE, an organisation working to support research into cardiology and heart surgery.

THE ACPR AND BANQUE DE FRANCE HELPED OUT IN THE NATIONWIDE DONATION DRIVE FOR RESTOS DU CŒUR

From 1 to 3 March 2024, *Les Restos du Cœur*, a charity, organised its annual nationwide food and hygiene products donation drive. The campaign targeted shoppers at supermarkets and neighbourhood stores and aimed to collect goods and products for the needy. The ACPR and Banque de France took part in the initiative through the skills sponsorship programme.

In total, seven pallets of goods were collected at Carrefour Sèvres, a supermarket in the seventh *arrondissement* of Paris.

40TH MARCHÉ DE LA BIÈVRE

In the night of Saturday 27 to Sunday 28 April 2024, four ACPR employees participated in the *Marché de la Bièvre*, a charity event, in support of *Petit Cœur de Beurre*, an organisation that advocates for the inclusion in sporting events of people suffering from congenital heart conditions, along with their family members. The walkers covered 52 km and proudly sported the ACPR's colours.

NO FINISH LINE

In June 2024, ACPR employees were part of the Banque de France team that came first in the annual No Finish Line charity race to support the Samu Social and Médecins du Monde charities, which received EUR 1 per km walked or run, or approximately EUR 60,000. Over the event's five days, 1,481 walkers and runners from the ACPR and the Banque de France covered more than 44,000 km.

GETTING INVOLVED IN WORLD CLEANUP DAY

As part of European Sustainability Week, around 20 ACPR and Banque de France employees took part in World Cleanup Day, which aims to raise awareness about growing amounts of waste and the consequences for our ecosystem. They picked up litter in the area around the ACPR's main building. In one hour, they collected around 2 kg of cigarette butts, 2 kg of recyclable waste, and 3.5 kg of general waste.

A TRAVELLING PHOTO EXHIBITION HIGHLIGHTING THE EFFECTS OF CLIMATE CHANGE

Over the space of a month, the ACPR's Paris office hosted "Regards croisés des témoins du changement climatique", a photo exhibition created by a colleague from the Banque de France showcasing different threatened European species.

The exhibition was an opportunity to raise awareness about species loss and biodiversity protection.

PARTICIPATION IN THE PIÈCES JAUNES FUNDRAISING CAMPAIGN WITH THE BANQUE DE FRANCE

The ACPR teamed up with the Banque de France, as part of its community engagement activities, to take part in the Pièces Jaunes (Small Change) fundraising campaign.

This initiative works to improve the daily lives of hospitalised young children and teenagers in France. The 2024 campaign raised EUR 5 million and funded 170 projects.

Director of publication: Nathalie Aufauvre
Photos: Antoine Monegier du Sorbier
Design and production: SGS&CO
Registration of copyright: May 2025
ISSN: 2416-8114

Autorité de contrôle prudentiel et de résolution



4, Place de Budapest,
CS 92459
75436 Paris Cedex 09

<https://acpr.banque-france.fr>