

2025 EU-wide EBA Stress Test Our First Glance at Results Confirms Banks Will Continue to Raise Dividends

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A | FINANCIAL SERVICES | INDUSTRY GROUP

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2025 EU-wide **Stress Test** Results are out



Key **Takeaways**

Results of 64 participating banks show a decline in capital depletion from 2023. Given strong capital positions, higher capital buffers post stress and improved profitability, most banks are expected to increase dividends and share buybacks.

Stress Test Impacts



- Capital depletion (2024 CET1 to adverse) of -304bps, 155bps lower than depletion observed in 2023 Stress Tests (-459bps)
- Lower depletion explained by similar severity of scenario and improved levels of starting point net interest income, profitability and credit risk
- Quality assurance impact remains high estimated at an average of -100bps or 1/3 of total impact
- Results do not generate any major surprises and demonstrate strong capital resilience of the European banking sector

Results by Country



- the largest and smallest changes in CET1
- Worst 3 countries by CET1 depletion:

· The following countries experienced

ratios under stress scenarios

Ireland: -453bps Denmark: -422bps

France: -417bps

Best 3 countries by CET1 depletion:

Poland: +91bps Norway: +26bps Portugal: -50bps

Capital Waterfall



- An analysis of the drivers of capital depletion shows NII and NFCI as the main improvement drivers, with impacts +52bps and +23bps vs 2023. NII projections are based on the ECB centralized NII platform
- Credit risk deteriorate by -14bps vs 2023
- OCI improves by 8bps and net trading income by 26bps compared to 2023

CRR3 Impact



- 2025 stress test has introduced a CRR3 restatement to account for Basel IV effects in the starting point, serving as first consistent disclosure for investors to compare European Banks.
- Basel IV restatement impact accounts for -3bps and -129pbs CET1 impact on transitional and fully loaded basis, respectively.
- The -182bps CET1 fully loaded impact is material for European G-SIBs. 85% of the impact is attributed to the output floor. As a result, the impact is manageable as only crystalizes in 2030 due to lengthy transitional arrangements.

Capital Distribution



- No incremental capital needs with no bank falling below the 5.5% old CET1 minimum threshold and 5 banks falling below 9% CET1
- Capital flexibility (measured as the buffer between CET1 post stress test and minimum threshold of 5.5%) increases to 584bps from 488bps in 2023
- Improvement in capital flexibility together with strong bank profitability trends mean increased capacity to raise dividends and buybacks
- Overall, we expect P2G to decline by as much as 50bps.

Stress Tests Go Forward



- The ECB will launch a geopolitical reverse stress test within the 2026 ICAAP assessment process, questioning banks about possible scenarios that could breach their minimum capital requirements.
- Banking, insurance, and market supervisors intend to launch a joint stress test focusing on less regulated entities such as hedge funds, private equity funds, private credit funds and other alternative asset managers to evaluate possible contagion effects on the financial system.
- Deregulation will be the top debate across global banking.



CCR3 Impact

Stress Test History

Our stress test scorecard is based on 2 metrics

Capital depletion (2024 CET1 to adverse FL)

Capital flexibility as post stress buffer*



Key takeaways

2025 EU Stress Test impact shows less capital depletion compared to ST'23 (-304bps vs. -459bps). Also, capital flexibility shows better results (584bps vs. 466bps).

CET1 Ratio (%)



Stress Test Scorecard

CCR3 Impact

Depletion by Bank and
Country

Capital Waterfall

Credit Risk

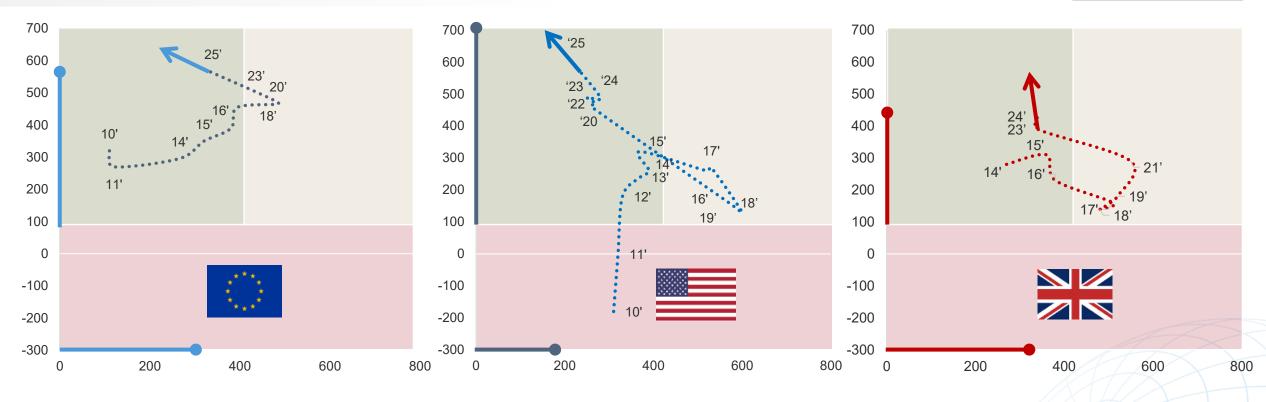
Global Stress Tests Scorecard & Trends



Key takeaways: Stress test results across the globe display a complex and varied picture. Tests across Europe, the US, and the UK indicate a shift towards lower depletion and higher capital flexibility, with US banks comparatively favorable outcomes.







CET1 Depletion (bps)

CET1 Depletion (bps)

CET1 Depletion (bps)

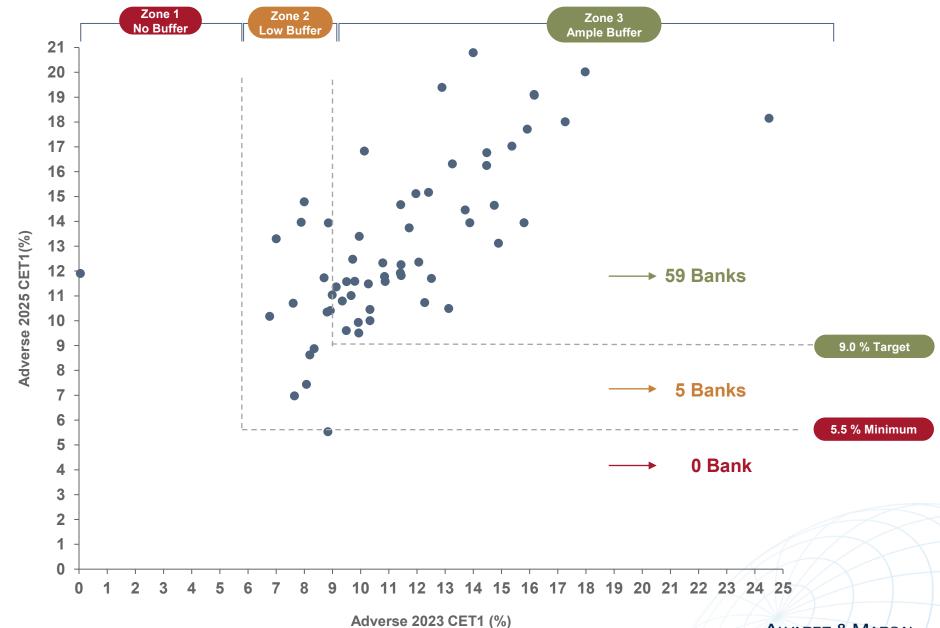
Capital Buffer Post Stress Zones



Key takeaways

We map post-stress CET1 by zone to size capital buffers.

No bank falls in the no buffer zone. A total of 5 banks are in low buffer zone, compared to 17 banks in the 2023 stress test.



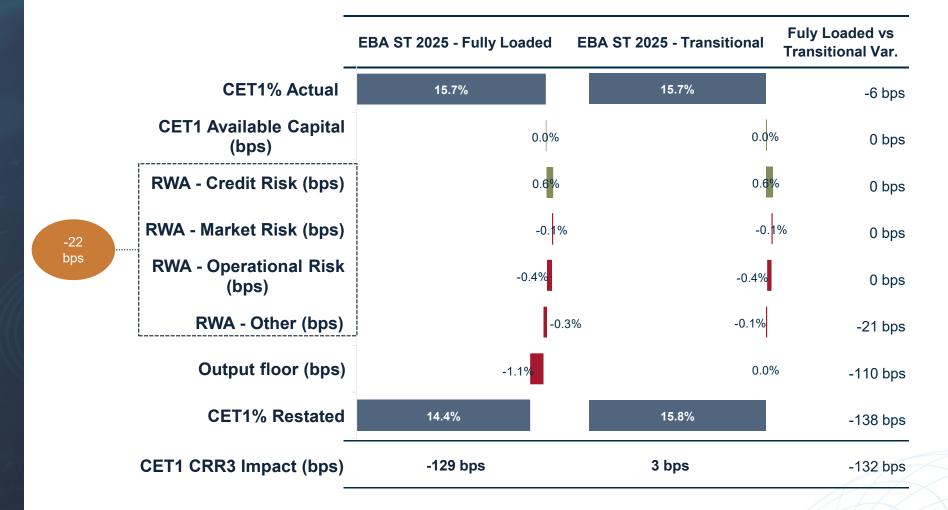
Basel IV Impact



Stress test 2025 introduces a CRR3 restatement in CET1 starting point with total impact of -129bps on a fully loaded basis. Impact for G-SIBs is -182bps.

RWA inflation accounts for - 22bps of impact due to operational risk and market risk

Output floor represents most of the impact -110bps or 85% of total. 18 banks activate the output floor.



Source: European Banking Authority (EBA) 2025 EU-wide Stress Test results

Basel IV Impact (1 of 2)



Key takeaways

Stress test 2025 introduces a CRR3 restatement in CET1 starting point with total impact of -129bps on a fully loaded basis. Impact for G-SIBs is -182bps.

RWA inflation accounts for - 22bps of impact due to operational risk and market risk

Output floor represents most of the impact -110bps or 85% of total. 18 banks activate the output floor.

					CRR3 Impact - Fully Loaded		
Code	Country	Bank Name	CET1 Available Capital (bps)	RWA (bps)	Output floor (bps)	CET1 CRR3 Impact (bps)	Qrt.
ERST	AT	Erste Group Bank AG	9	66	0	74	1st
RAZE	AT	Raiffeisen Bank	0	0	0	0	1st
BELF	BE	Belfius Banque SA	0	89	0	89	1st
KBC	BE	KBC Group NV	-6	-37	0	-43	
BLB	DE	Bayerische Landesbank	4	227	-544	-313	4th
CITI	DE	Citigroup GM Europe AG	0	-541	0	-541	4th
COM	DE	Commerzbank AG	3	-2	-139	-138	
DEBK	DE	Deutsche Bank AG	-12	13	-381	-380	4th
DZB	DE	DZ BANK	14	106	0	120	1st
GSBE	DE	GS Bank Europe SE	0	-567	0	-567	4th
JPM	DE	J.P. Morgan SE	0	-120	0	-120	
LBW	DE	Landesbank Baden-Württemberg	1	199	-390	-190	4th
LHTG	DE	Helaba	49	173	-356	-134	
MSE	DE	Morgan Stanley Europe	1	-149	0	-148	4th
NRW	DE	Norddeutsche Landesbank	41	179	-485	-264	4th
VWFS	DE	Volkswagen Financial Services	0	-73	0	-73	
DBK	DK	Danske Bank	3	19	-242	-220	4th
JBK	DK	Jyske Bank	0	-106	0	-105	701
NKR	DK	Nykredit Realkredit		-48	-121	-169	4th
BBVA	ES	BBVA	7	-7	0	0	1st
SAB	ES	Banco de Sabadell		13	0		1st
SAN	ES	Banco Santander	0 5	-62	0	13 -58	151
BKT	ES	Bankinter	0	-38	0		
KXA	ES	CaixaBank	-1	-36 24	0	-38 23	1 a t
UNI			0	-3	0	-3	1st
OPG	ES FI	Unicaja Banco					
NORD	FI FI	Nordea Bank	<u> </u>	-146	0 -277	-146 -302	441-
		OP Osuuskunta		-28			4th
BNPP	FR	BNP Paribas	6	-75	-117	-186	4th
BOFA	FR	BofA Europe	0	39	0	39	1st
BPCE	FR	Crédit Mutuel	5	56	-161	-100	
CA	FR 	Groupe Crédit Agricole	8	31	-319	-280	4th
CMUT	FR	Groupe BPCE	10	-94	-96	-180	4th
LBP	FR	La Banque Postale	0	-36	0	-36	
SOCG	FR	Société Générale	4	-86	-46	-128	
HSBCF	FR	HSBC Continental Europe	8	-139	0	-131	
G-SIBs		Total G-SIBs Weighted Avg.	3	-37	-149	-182	
EU		Total EU Weighted Avg.	4	-22	-111	-129	

Source: European Banking Authority (EBA) 2025 EU-wide Stress Test results

Basel IV Impact (2 of 2)



Key takeaways

Stress test 2025 introduces a CRR3 restatement in CET1 starting point with total impact of -129bps on a fully loaded basis. Impact for G-SIBs is -182bps.

RWA inflation accounts for - 22bps of impact due to operational risk and market risk

Output floor represents most of the impact -110bps or 85% of total. 18 banks activate the output floor.

					CRR3 Impact - Fully Loaded	d	
Code	Country	Bank Name	CET1 Impact (bps)	RWA before Output Floor (bps)	RWA after Output Floor (bps)	Total Impact (bps)	Qrt.
ALPHA	GR	ALPHA	0	-34	0	-34	
NBG	GR	National Bank of Greece	0	-104	0	-104	
PIRAGH	GR	Piraeus Financial Holdings	0	-147	0	-147	4th
OTP	HU	OTP Bank Nyrt.	0	-93	0	-93	
AIB	ΙΕ	Allied Irish Banks	0	127	0	127	1st
BOFE	ΙΕ	Bank of America Europe DAC	0	-52	0	-52	
BIRE	ΙΕ	Bank of Ireland Group	11	102	0	113	1st
BARC	ΙΕ	Barclays Bank Ireland	0	51	0	51	1st
CITIH	ΙΕ	Citibank Holdings Ireland	0	115	0	115	1st
MPS	IT	Monte dei Paschi di Siena	-1	120	0	120	1st
COPOP	ΙΤ	Banco BPM	-4	-139	0	-143	
BPER	ΙΤ	BPER Banca	0	-97	0	-96	
IBICCC	ΙΤ	Iccrea Banca	0	-68	0	-68	
ISP	ΙΤ	Intesa Sanpaolo	7	-94	0	-86	
UC	ΙΤ	UniCredit	1	-114	-86	-200	4th
ABN	NL	ABN AMRO	2	-52	0	-50	
COOPR	NL	Coöperatieve Rabobank	34	204	-208	30	1st
ING	NL	ING Groep	-5	-4	-119	-128	
DNB	NO	DNB Bank	-4	-49	0	-53	
PLK	PL	Bank Polska Kasa Opieki	0	57	0	57	1st
PBP	PL	PKO Bank Polski	0	-122	0	-122	
BCPSA	PT	Banco Comercial Português	12	-64	0	-52	
CGD	PT	Caixa Geral de Depósitos	0	-26	0	-26	
TRA	RO	Banca Transilvania	4	-13	0	-9	
LBAB	SE	Länförsäkringar Bank AB	5	-7	0	-2	
SBAB	SE	SBAB Bank AB	10	162	0	172	1st
SEB	SE	Skandinaviska Enskilda Banken	0	-79	-318	-397	4th
SHAN	SE	Svenska Handelsbanken	0	8	0	8	1st
SWED	SE	Swedbank	0	-12	0	-12	
G-SIBs		Total G-SIBs Weighted Avg.	3	-37	-149	-182	
EU		Total EU Weighted Avg.	4	-22	-111	-129	

Banks with the highest capital depletion on a fully loaded basis include BofA Securities Europe, Morgan Stanley Europe, and Bank of America Europe. Those with the lowest include Bank Polska, Powszechna Kasa Bank, and DNB Bank.

Stress Test Scorecard	CCR3 Impact	Depletion by Bank a Country

and

Capital Waterfall

				EBA 2025			EBA 2023		
Code	Country	Bank Name	Stresse	d CET1 Depletion 2024	Stressed C	ET1 Depletion 2022-	2025	Depletion Chg. 25 vs	
			Fully Loaded	Impact Bps	Qrt.	Fully Loaded	Impact Bps	Qrt.	23 (FL)
ERST	AT	Erste Group Bank AG		-350			-341		8
RAZE	AT	Raiffeisen Bank		-161	1st		-316	1st	-155
BELF	BE	Belfius Banque SA		-389			-412		-23
KBC	BE	KBC Group NV		-273			-386		-112
BLB	DE	Bayerische Landesbank		-400			-786	4th	-386
CITI	DE	Citigroup GM Europe AG		-738	4th		-860	4th	-122
COM	DE	Commerzbank AG		-412			-464		-52
DEBK	DE	Deutsche Bank AG		-226			-528		-302
DZB	DE	DZ BANK		-366			-652	4th	-286
GSBE	DE	GS Bank Europe SE		-661	4th		-712	4th	-51
JPM	DE	J.P. Morgan SE		-447	4th		-587	4th	-139
LBW	DE	Landesbank Baden-Württemberg		-709	4th		-547		162
LHTG	DE	Helaba		-578	4th		-561		17
MSE	DE	Morgan Stanley Europe		-906	4th		-877	4th	29
NRW	DE	Norddeutsche Landesbank		-302			-747	4th	-445
VWFS	DE	Volkswagen Financial Services		-277			-350		-73
DBK	DK	Danske Bank		-396			-657	4th	-261
JBK	DK	Jyske Bank		-485	4th		-649	4th	-164
NKR	DK	Nykredit Realkredit		-439			-585	4th	-146
BBVA	ES	BBVA		-186			-295	1st	-109
SAB	ES	Banco de Sabadell		-281			-374		-94
SAN	ES	Banco Santander		-173			-170	1st	3
BKT	ES	Bankinter		-55	1st		-159	1st	-104
KXA	ES	CaixaBank		-162			-313	1st	-151
UNI	ES	Unicaja Banco		-259			-326		-67
OPG	FI	Nordea Bank		-495	4th		-549		-54
NORD	FI	OP Osuuskunta		-225			-330		-105
BNPP	FR	BNP Paribas		-213			-392		-179
BOFA	FR	BofA Europe		-1263	4th		-968	4th	295
BPCE	FR	Crédit Mutuel		-523	4th		-520		4
CA	FR	Groupe Crédit Agricole		-478			-731	4th	-253
CMUT	FR	Groupe BPCE		-530	4th		-735	4th	-204
LBP	FR	La Banque Postale		-646	4th		-1462	4th	-816
SOCG	FR	Société Générale		-337			-513	7/	-176
HSBCF	FR	HSBC Continental Europe		-663	4th		1	77/	0
G-SIBs		Total G-SIBs Weighted Avg.		-332			-463	14	-131
EU		Total EU Weighted Avg.		-304			-459	1///	-155

Banks with the highest capital depletion on a fully loaded basis include BofA Securities Europe, Morgan Stanley Europe, and Bank of America Europe. Those with the lowest include Bank Polska, Powszechna Kasa Bank, and DNB Bank.

Country	Stress Test Scorecard	CCR3 Impact	Depletion by Bank a Country
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Source: European Banking Authority (EBA) 2025 EU-wide Stress Test results

ank and Capital Waterfall

				EBA 2025			EBA 2023		
Code	Country	Bank Name	Stresse	d CET1 Depletion 2024	4-2027	Stressed C	ET1 Depletion 2022-	-2025	Depletion Chg. 25 vs
	Joanna, J		Fully Loaded			Fully Loaded	Impact Bps	Qrt.	23 (FL)
ALPHA	GR	ALPHA		-197			-307	1st	-110
NBG	GR	National Bank of Greece		-50	1st		-136	1st	-86
PIRAGH	GR	Piraeus Financial Holdings		-165			-240	1st	-76
OTP	HU	OTP Bank Nyrt.		-124	1st		-77	4th	47
AIB	ΙΕ	Allied Irish Banks		-298			-632		-334
BOFE	ΙΕ	Bank of America Europe DAC		-857	4th				
BIRE	ΙΕ	Bank of Ireland Group		-195			-393	4th	-198
BARC	ΙΕ	Barclays Bank Ireland		-634	4th		-974		-340
CITIH	ΙE	Citibank Holdings Ireland		-351			-323		28
MPS	IT	Monte dei Paschi di Siena		-257			-551		-294
COPOP	IT	Banco BPM		-258			-384		-126
BPER	IT	BPER Banca		-89	1st		-415		-327
IBICCC	ΙΤ	Iccrea Banca		-176			-435	1st	-259
ISP	ΙΤ	Intesa Sanpaolo		-62	1st		-268		-206
UC	IT	UniCredit		-215			-349		-133
ABN	NL	ABN AMRO		-394			-484		-90
COOPR	NL	Coöperatieve Rabobank		-252			-453		-201
ING	NL	ING Groep		-187			-554	1st	-367
DNB	NO	DNB Bank		26	1st		-212		-185
PLK	PL	Bank Polska Kasa Opieki		118	1st		59		59
PBP	PL	PKO Bank Polski		74	1st		-322	1st	-247
BCPSA	PT	Banco Comercial Português		-100	1st		-449		-349
CGD	PT	Caixa Geral de Depósitos		2	1st		-76	1st	-74
TRA	RO	Banca Transilvania		-139	1st			1st	
LBAB	SE	Länförsäkringar Bank AB		-132	1st		40		92
SBAB	SE	SBAB Bank AB		-244			-136		108
SEB	SE	Skandinaviska Enskilda Banken		-51	1st		-407	1st	-356
SHAN	SE	Svenska Handelsbanken		-119	1st		-371		-252
SWED	SE	Swedbank		-59	1st		-163		-105
G-SIBs		Total G-SIBs Weighted Avg.		-332			-463		-131
EU		Total EU Weighted Avg.		-304			-459		-155

Credit Risk

Capital Depletion by Country



Key takeaways

The three countries with the greatest CET1 depletion on a fully loaded basis (measured as adverse CET1 depletion from 2023 to 2025) are Ireland, Denmark and France. The three countries with the lowest depletion are Poland, Norway and Portugal.

			EBA 2025		Е	BA 2023		
Country	Bank Name	Stressed C	ET1 Depletion	2024-2027	Stressed CET1	Depletion 2	022-2025	Depletion Chg.
		Fully Loaded	Impact Bps	Qrt.	Fully Loaded	Impact Bps	Qrt.	25 vs 23 (FL)
AT	Austria		-279			-325		-45
BE	Belgium		-315			-395		-80
DE	Germany		-384	4th		-577	4th	-193
DK	Denmark		-422	4th		-625	4th	-202
ES	Spain		-180			-242		-62
FI	Finland		-301			-403		-102
FR	France		-417	4th		-592	4th	-175
GR	Greece		-134			-228		-94
HU	Hungary		-124	1st		-77	1st	47
IE	Ireland		-453	4th		-549	4th	-96
IT	Italy		-154			-351		-196
NL	Netherlands		-249			-523		-274
NO	Norway		26	1st		-212	1st	-185
PL	Poland		91	1st		-170	1st	-79
PT	Portugal		-50	1st		-271		-221
RO	Romania		-139		-	0		139
SE	Sweden		-89	1st		-292		-203
G-SIBs	Total G-SIBs Weighted Avg.		-332			-463		-131
EU	Total EU Weighted Avg.		-304			-459	11	-155

Depletion by Bank and Stress Test Scorecard **CCR3** Impact **Capital Waterfall** Credit Risk Country

Capital Waterfall



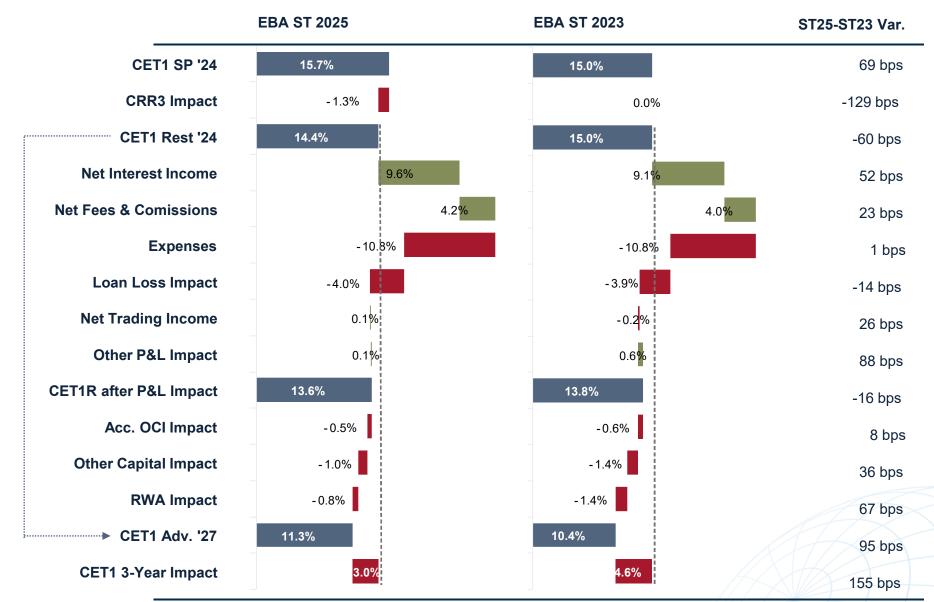
Key takeaways

An analysis of the drivers of capital depletion shows NII and NFCI as the main improvement drivers, with impacts+52bps and +23bps vs 2023. NII projections are based on the ECB centralized NII platform

Credit risk deteriorates by -14bps vs 2023

OCI improves by 8bps and net trading income by 26bps compared to 2023

Source: European Banking Authority (EBA) 2025 EU-wide Stress Test results



Depletion by Bank and Stress Test Scorecard Capital Waterfall **CCR3** Impact Country

Credit Risk Scorecard



Key takeaways: A deep dive on credit risk impacts shows that Retail - Secured by real estate property – Non-SME is one of the most sensitive asset classes measured by Provision Multipliers for Stage 2 and 3.

ASSET CLASS	Adverse 2027 Exposures		Adv vs. Base Exposure Multiplier		Adverse 2027 Cost of Risk	1 101 01 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0			Adv vs. Base Provisions Multiplier				
	Stage1	Stage2	Stage3	Stage1	Stage2	Stage3	Average Annual	Stage1	Stage2	Stage3	Stage1	Stage2	Stage3
Central banks		97%	3%	x 1,0	x 1,4	x 1,5	1 bps	0,0%	0,2%	5,8%	x 2,0	x 2,5	x 2,1
Central governments		91%	8%	x 1,0	x 1,3	x 1,4	21 bps	0,1%	1,7%	37,6%	x 1,6	x 2,1	x 1,5
Institutions		92%	7%	x 1,0	x 1,8	x 1,7	15 bps	0,1%	1,2%	35,9%	x 1,7	x 2,3	x 1,7
Corporates	7	1%	20%	x 0,9	x 1,5	x 1,6	83 bps	0,3%	3,4%	38,3%	x 1,9	x 2,2	x 1,7
Corporates - Specialized Lending	68	3%	23%	x 0,9	x 1,4	x 1,6	72 bps	0,2%	3,3%	31,4%	x 1,7	x 2,3	x 1,7
Corporates - SME	66	%	21%	x 0,8	x 1,5	x 5,4	123 bps	0,5%	4,8%	38,1%	x 2,1	x 2,1	x 1,7
Corporates - Other	7	4%	19%	x 0,9	x 1,5	x 1,2	74 bps	0,3%	2,9%	40,1%	x 1,8	x 2,2	x 1,7
Retail		77%	15%	x 0,9	x 1,4	x 1,4	93 bps	0,4%	5,0%	39,8%	x 1,8	x 2,0	x 1,6
Retail - Secured by real estate property		81%	14%	x 0,9	x 1,5	x 1,6	40 bps	0,1%	3,1%	22,7%	x 2,3	x 2,4	x 1,8
Retail - Secured by real estate property - SME	64	%	21%	x 0,9	x 1,3	x 1,6	148 bps	0,6%	7,6%	38,3%	x 2,2	x 2,2	x 1,7
Retail - Secured by real estate property - Non SME		82%	13%	x 0,9	x 1,5	x 1,6	35 bps	0,1%	2,8%	20,8%	x 2,4	x 2,4	x 1,8
Retail - Qualifying Revolving		77%	13%	x 0,9	x 1,3	x 1,3	193 bps	0,9%	6,5%	67,5%	x 1,6	x 1,4	x 1,4
Retail - Other	67	·%	18%	x 0,9	x 1,2	x 1,3	217 bps	1,0%	8,5%	54,0%	x 1,6	x 1,9	x 1,5
Retail - Other - SME	65	%	20%	x 0,9	x 1,2	x 1,3	175 bps	0,7%	6,4%	50,7%	x 1,6	x 1,7	x 1,5
Retail - Other - Non SME	68	3%	17%	x 0,9	x 1,2	x 1,3	241 bps	1,1%	9,8%	55,7%	x 1,6	x 2,0	x 1,5
Equity		98%	2%	x 1,0	x 1,1	x 1,3	16 bps	0,1%	1,4%	46,3%	x 1,2	x 1,9	x 1,4
Other exposures		86%	13%	x 1,0	x 1,0	x 1,4	9 bps	0,0%	1,2%	37,0%	x 1,6	x 1,4	x 1,6
TOTAL		80%	14%	x 0,9	x 1,4	x 1,5	64 bps	0,2%	3,7%	38,8%	x 1,8	x 2,1	x 1,6

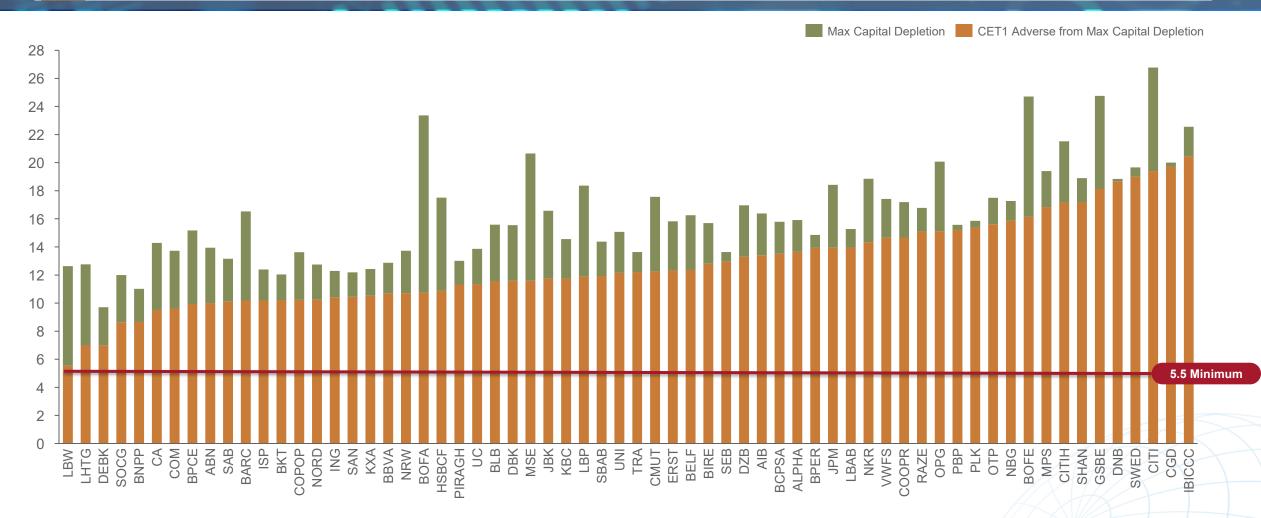
Credit Risk



Capital Flexibility



Key takeaways: No incremental capital needs, with no bank falling below the previous 5.5% CET1 minimum threshold.



P2G Methodology



Key takeaways

Stress test results drive Pillar 2 Guidance (P2G) requirements — the additional capital above minimum regulatory thresholds that the ECB expects banks to hold. For some banks, this will result in higher P2R levels due to deficiencies in data quality or governance. We expect the ECB to adopt a similar approach to P2G calculations as used in ST 2023.

- The Pillar 2 Guidance is a bank-specific recommendation that indicates the level of capital that the ECB expects banks to maintain in addition to their binding capital requirements
- Since 2021, ECB Banking Supervision uses a two-step bucketing approach to determine banks' individual P2G levels

Step 1: Bucketing

Source: ECB Banking Supervision guidance: A&M analysis

 Banks are placed into one of four buckets based on the depletion of their capital ratios in the EBA Stress Test.



Step 2: JST Adjustment

- The final P2G is set within the bucket range, or exceptionally beyond it, based on each bank's specific situation, such as risk profile and the timing of the lowest capital ratio during the stress test.
- Based on banks' individual situations, such as their risk profiles and the year in which their capital ratio reached its lowest point during the EBA Stress Test

This approach to estimate P2G based on stress test depletion generated an implied P2G of 150bps in ST23 vs. 130bps actual P2G reported by ECB

P2G Forecast (1 of 2)



Key **Takeaways**

Based on the 2023 EBA Stress Test Methodology, P2G is expected to shape outcomes in the dividend increase race.

Overall, we expect P2G to decline by as much as 50bps from 150bps to 100bps in average across EU banks.

		P2	G Calculatio	n			Capital	Flexibility	
Bank Name	Maximum CET1 Depletion (Bps)	P2G (Bps) ST25	P2G (Bps) ST23	ST25-ST23 Var.	P2G Bucket (%)	CET 1 (%)	Total Capital Requirement (%)	Excess Capital (%)	Qrt.
BofA Europe	1263	325	100	225	From 1.75%	23.36%	14.00%	9.36%	1st
Morgan Stanley Europe	906	250	150	100	From 1.75%	20.65%	13.25%	7.40%	1st
Bank of America Europe DAC	857	225	175	50	1% - 2.75%	24.71%	12.35%	12.36%	1st
Citigroup GM Europe AG	738	200	225	-25	1% - 2.75%	26.78%	13.00%	13.78%	1st
Landesbank Baden-Württemberg	709	200	150	50	1% - 2.75%	12.63%	11.87%	0.76%	4th
GS Bank Europe SE	664	175	175	0	1% - 2.75%	24.76%	12.50%	12.26%	1st
HSBC Continental Europe	663	175	150	25	1% - 2.75%	17.51%	12.75%	4.76%	
La Banque Postale	646	175	200	-25	1% - 2.75%	18.37%	11.75%	6.62%	
Barclays Bank Ireland	634	175	250	-75	1% - 2.75%	16.53%	12.69%	3.84%	
Helaba	578	150	150	0	0.5% - 2%	12.76%	11.75%	1.01%	4th
Groupe Crédit Agricole	530	150	150	0	0.5% - 2%	14.29%	11.00%	3.29%	
Groupe BPCE	523	150	250	-100	0.5% - 2%	15.17%	11.60%	3.57%	
OP Osuuskunta	495	125	100	25	0.5% - 2%	20.07%	11.50%	8.57%	1st
Jyske Bank	485	125	175	-50	0.5% - 2%	16.58%	12.59%	3.99%	
Groupe Crédit Agricole	478	125	150	-25	0.5% - 2%	14.29%	11.00%	3.29%	
Nykredit Realkredit	451	125	175	-50	0.5% - 2%	18.85%	11.55%	7.30%	
J.P. Morgan SE	447	125	225	-100	0.5% - 2%	18.42%	11.75%	6.67%	
Citibank Europe plc	435	125	100	25	0.5% - 2%	21.52%	11.75%	9.77%	1st
Commerzbank AG	412	125	125	0	0.5% - 2%	13.73%	11.50%	2.23%	4th
Bayerische Landesbank	400	125	200	-75	0.5% - 2%	15.58%	11.25%	4.33%	
Danske Bank	396	100	100	0	0.5% - 2%	15.55%	12.15%	3.39%	
ABN AMRO	394	100	125	-25	0.5% - 2%	13.95%	11.25%	2.70%	
Belfius Banque SA	389	100	125	-25	0.5% - 2%	16.25%	11.16%	5.09%	
DZ BANK	366	100	150	-50	0.5% - 2%	16.97%	10.88%	6.09%	
Erste Group Bank AG	350	100	100	0	0.5% - 2%	15.83%	10.90%	4.93%	
Banco BPM	339	100	125	-25	0.5% - 2%	13.62%	11.52%	2.10%	4th
Société Générale	337	100	375	-275	0.5% - 2%	11.99%	11.42%	0.57%	4th
Banco de Sabadell	304	100	75	25	0.5% - 2%	13.16%	11.25%	1.91%	4th
Norddeutsche Landesbank	302	100	225	-125	0.5% - 2%	13.73%	11.75%	1.98%	4th
Allied Irish Banks	298	75	75	0	0% - 1%	16.38%	11.35%	5.03%	
Unicaja Banco	292	75	100	-25	0% - 1%	15.07%	11.00%	4.07%	
Bank of Ireland Group	289	75	125	-50	0% - 1%	15.69%	11.10%	4.59%	
KBC Group NV	281	75	125	-50	0% - 1%	14.56%	10.61%	3.95%	
Total EU Weighted Avg.		100	150	-50	-				

Max Capital depletion = EBA Peak to Trough

P2G starting point calculation based on A&M estimates, measured as maximum CET1 * 0.25 (estimated factor), and rounded up to next 25 bps

P2G Forecast (2 of 2)



Key Takeaways

Based on the 2023 EBA Stress Test Methodology, P2G is expected to shape outcomes in the dividend increase race.

Overall, we expect P2G to decline by as much as 50bps from 150bps to 100bps in average across EU banks.

		P2	G Calculation			Capital Flexibility					
Bank Name	Maximum CET1 Depletion (Bps)	P2G (Bps)	P2G (Bps) ST23		P2G Bucket (%)	CET 1 (%)	Total Capital Requirement (%)	Excess Capital (%)	Qrt.		
Volkswagen Financial Services	277	75	200	-125	0% - 1%	17.42%	11.00%	6.42%			
Deutsche Bank AG	272	75	150	-75	0% - 1%	9.71%	11.40%	-1.69%	4th		
Monte dei Paschi di Siena	257	75	150	-75	0% - 1%	19.40%	11.50%	7.90%	1st		
Coöperatieve Rabobank	252	75	125	-50	0% - 1%	17.19%	10.65%	6.54%			
Nordea Bank	250	75	150	-75	0% - 1%	12.74%	10.35%	2.39%			
UniCredit	250	75	125	-50	0% - 1%	13.86%	10.75%	3.11%			
SBAB Bank AB	244	75	50	25	0% - 1%	14.37%	10.62%	3.75%			
BNP Paribas	235	75	100	-25	0% - 1%	11.01%	10.52%	0.49%	4th		
Banco Comercial Português	228	75	100	-25	0% - 1%	15.79%	11.25%	4.54%			
ALPHA	226	75	125	-50	0% - 1%	15.91%	11.75%	4.16%			
Intesa Sanpaolo	221	75	100	-25	0% - 1%	12.40%	10.25%	2.15%	4th		
BBVA	218	75	175	-100	0% - 1%	12.88%	10.43%	2.45%			
ccrea Banca	211	75	125	-50	0% - 1%	22.55%	11.28%	11.27%	1st		
CaixaBank	190	50	50	0	0% - 1%	12.42%	10.25%	2.17%	4th		
OTP Bank Nyrt.	187	50	100	-50	0% - 1%	17.49%	10.10%	7.39%	1st		
NG Groep	187	50	275	-225	0% - 1%	12.29%	10.15%	2.14%	4th		
Bankinter	182	50	50	0	0% - 1%	12.04%	9.89%	2.15%	4th		
Banco Santander	173	50	100	-50	0% - 1%	12.19%	10.24%	1.95%	4th		
Svenska Handelsbanken	173	50	125	-75	0% - 1%	18.90%	10.34%	8.56%	1st		
Piraeus Financial Holdings	168	50	75	-25	0% - 1%	13.01%	11.50%	1.51%	4th		
Raiffeisen Bank	167	50	100	-50	0% - 1%	16.78%	11.30%	5.48%			
Banca Transilvania	143	50	50	0	0% - 1%	13.63%	12.33%	1.30%	4th		
National Bank of Greece	140	50	100	-50	0% - 1%	17.27%	11.25%	6.02%			
Länförsäkringar Bank AB	132	50	25	25	0% - 1%	15.27%	10.60%	4.67%			
BPER Banca	92	25	125	-100	0% - 1%	14.86%	10.50%	4.36%			
Skandinaviska Enskilda Banken	70	25	125	-100	0% - 1%	13.63%	10.47%	3.16%			
Swedbank	67	25	75	-50	0% - 1%	19.67%	11.04%	8.63%	1st		
Bank Polska Kasa Opieki	48	25	75	-50	0% - 1%	15.85%	8.25%	7.60%	1st		
PKO Bank Polski	36	25	25	0	0% - 1%	15.58%	8.25%	7.33%	1st		
Caixa Geral de Depósitos	29	25	125	-100	0% - 1%	20.00%	10.15%	9.85%	1st		
DNB Bank	17	25	150	-125	0% - 1%	18.85%	9.95%	8.90%	1st		
Total EU Weighted Avg.		100	150	-50							

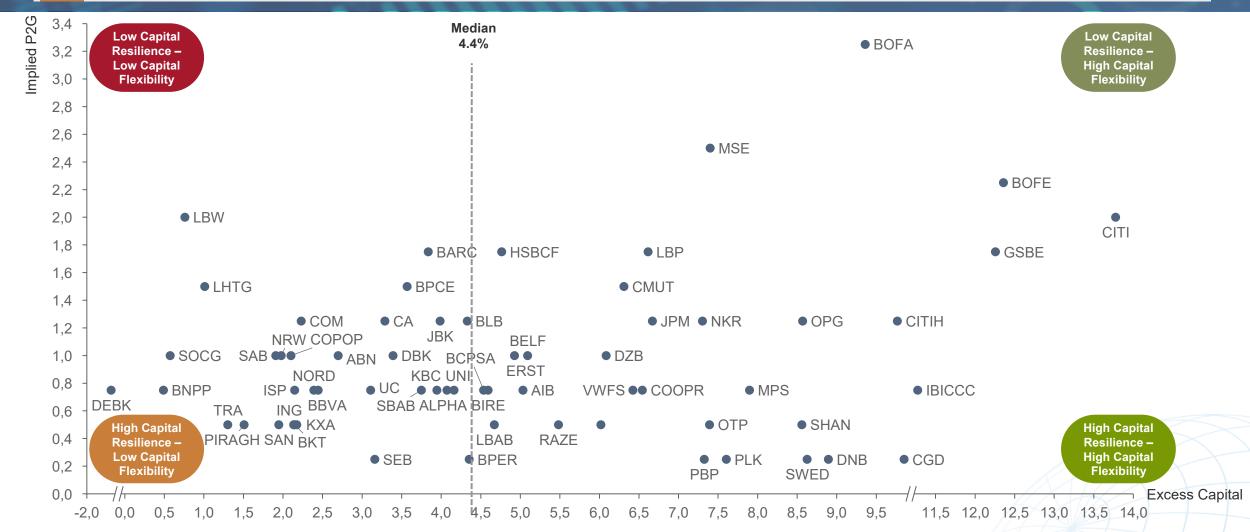
Max Capital depletion = EBA Peak to Trough

P2G starting point calculation based on A&M estimates, measured as maximum CET1 * 0.25 (estimated factor), and rounded up to next 25 bps

Capital Flexibility



Key Takeaway: Our capital flexibility scorecard map shows banks in the green zone with greater ability to increase payouts





The Future of Stress Testing: What to Expect Going Forward

Geopolitical and shadow banking risks are expected to be key areas of focus in the 2026 regulatory stress tests. A global discussion is also anticipated around deregulation versus simplification, with the US potentially taking the lead on easing capital requirements.



Geopolitical Reverse **Stress Test**

The ECB will launch a geopolitical reverse stress test within the 2026 ICAAP assessment process, questioning banks about possible scenarios that could breach their minimum capital requirements

https://www.bankingsupervision.europa.eu/press/speeches/date/2025/html/ssm.sp250715.en.html



Shadow Banking Stress Test



Banking, insurance, and market supervisors intend to launch a joint stress test focusing on less regulated entities such as hedge funds, private equity funds, private credit funds and other alternative asset managers in order to evaluate possible contagion effects on the financial system.

https://www.ft.com/content/72a515ac-83a5-4896-b270-dd3f817dc4a6



Deregulation or Simplification

American and British regulators are working on various deregulation proposals to lighten the requirements for banks. In Europe, the discussion is not about deregulation but about simplification and greater agility in supervisory processes.

https://www.federalreserve.gov/newsevents/speech/powell20250722a.htm

The Future of Stress Testing. What to Expect Going Forward?



The ECB will launch a **geopolitical reverse stress test** within the 2026 ICAAP assessment process, questioning banks about possible scenarios that could breach their minimum capital requirements

01



Risk Inventory

- Identify and inventory the geopolitical risk types such as conflicts/wars, diplomacy, sanctions and trade restrictions, terrorism, etc.
- Assess likelihood of events of events based on available geopolitical risk indexes or indicators
- Map events to bank business units and geographies

02



Scenarios

- Identify top 10 geopolitical scenarios across event types
- Define macro-economic and market variables impacted by each scenario
- Define range of severity of each scenario and corresponding values for each scenario variable
- Consider combination of multiple scenarios happening at the same time

03



Trans-mission Channels

- PPNR: Impact on business volumes / activity, net interest income, fees and commissions and expenses
- 2. Credit Risk: impairments across portfolios exposed to geopolitical event by asset, sector, client and country
- Market Risk: losses in trading, banking book or other investments
- **4. Liquidity Risk**: loss of asset liquidity or deposit run-offs
- **5. Operational Risk**: third-party, cyber, other losses

04



Impact Analysis

- Estimate of capital impact by scenario and severity range
- Estimate of liquidity impact by scenario and severity range
- Estimate indirect losses (reputation, loss of business and fines)
- Estimate combined impact in capital and liquidity from multiple scenarios
- Produce result analytics by business and country

05



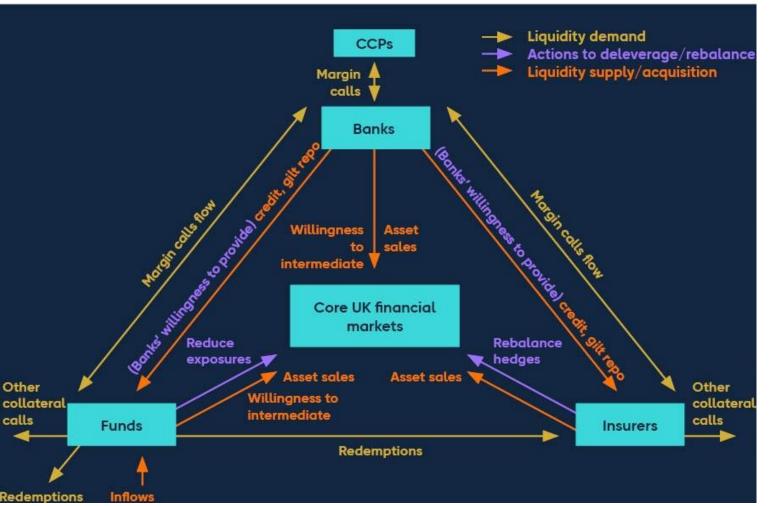
Mitigation Actions

- Identify management mitigation actions by scenario and severity
- Assess operational viability of proposed actions
- Evaluate financial impacts post mitigation actions
- Integrate stress test output and results in ICAAP and ILAAP

Iterative Process to Arrive at Reverse

The Future of Stress Testing. What to Expect Going Forward?

Banking, insurance, and market supervisors intend to launch a joint stress test focusing on less regulated entities such as hedge funds, private equity funds, private credit funds and other alternative asset managers.



A&M Expectations

- 1. The European exercise will be similar to the Bank of England's System-Wide Exploratory Scenario (SWES) exercise conducted in 2024 to explore how the UK financial system would respond to a market shock (e.g., UK gilt market shock —see illustration)
- 2. Goals are to enhance understanding of the risks to and from Non-bank Financial Institutions (NBFIs), and the behavior of NBFIs and banks in stress, including what drives those behaviors; and investigate how these behaviors and market dynamics can amplify shocks in markets and potentially pose risks to UK financial stability.
- 3. Participating firms (banks, insurers, pension schemes, hedge funds, asset managers and central counterparties) will be asked to evaluate how they would be affected by, and respond to, a stress scenario. We believe a scenario involving private credit is likely to be used.
- 4. The exercise will also evaluate mitigation and response actions, including contagion effects. Outcomes will inform assessments of non-bank financial institution (NBFI) resilience and broader system stability.

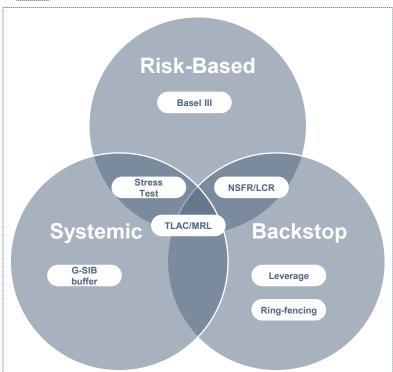
The Future of Stress Testing. What to Expect **Going Forward?**

3

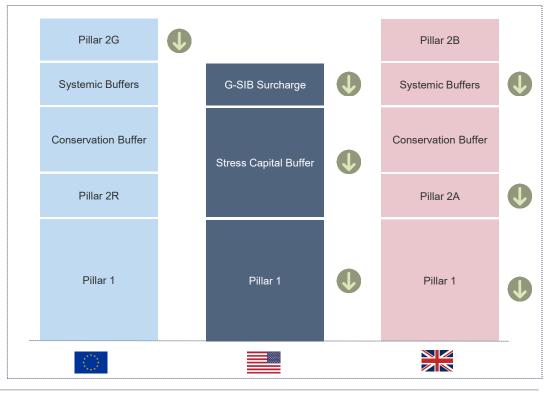
US and UK regulators are reviewing proposals to reduce capital requirements for banks. In continental Europe, the focus remains on simplifying regulatory processes



Overlapping Regulatory Requirements









Deregulation Initiatives



- 1. Simplification: more efficient supervisory processes, including SREP, model approvals and regulatory reporting
- 2. Pillar 2 G: expected reduction of as much as 50bps based on ST25 capital results
- 1. Basel III end game: less stringent Basel III implementation including FRTB, credit risk weights and operational risks
- 2. Lower stress test requirements: reduction of stress test capital buffer levels and volatility
- 3. Double counting: elimination of overlaps in requirements (e.g. FRTB and Global Market Stress)
- 4. G-SIB surcharge: simplification of methodology to reduce overall levels
- 5. Leverage: reduction of requirements through treasuries exemption
- 1. Basel III: less stringent Basel III implementation including FRTB and P2A reductions to offset higher risk weights
- 2. CCyB: review countercyclical buffer
- 3. MREL: less MREL requirements for smaller banks
- 4. Ring-fencing: simplification of ring-fence bank regulation can result in capital savings
- **5.** Leverage: potential review of leverage ratio





Summary of Scenarios – Macro EU Countries



The scenarios narrative shows geopolitical tensions leading to stagflation, with increased energy prices and production costs, further supply chain disruptions worldwide, and persistently high inflation.

Worse GDP shock with less severe unemployment rate and Residential Real Estate (RRE) shocks.

GDP shocks show limited variation across countries compared to ST 2023 and are greater than 500 bps in all key countries except for Spain and Ireland

Unemployment rate shows divergences across EU countries, with higher impact compared to ST'23 in Portugal, Netherlands and Germany with the rest of the key countries suffering milder shocks. House Price Index shock for Residential Real Estate only more severe in Greece, Ireland and Italy.

		GDP (Net sh	ock) ¹	Uner	mployment	(Net shock) ¹	House	Price Index	(Net shock) ¹
	ST 2025	ST 2023	Difference (bps)	ST 2025	ST 2023	Difference (bps)	ST 2025	ST 2023	Difference (bps)
France	-585	-574	+11	504	595	-91	-1296	-1974	-678
Germany	-748	-643	+105	505	409	+96	-1278	-2580	-1302
Greece	-611	-548	+63	415	478	-63	-2231	-630	+1600
Ireland	-392	-378	+14	731	770	-39	-1735	-1106	+629
Italy	-735	-717	+18	458	465	-7	-1199	-675	+524
Netherlands	-551	-539	+12	662	571	+91	-2348	-3243	-895
Portugal	-577	-498	+79	647	544	+103	-2471	-2543	-72
Spain	-408	-536	-127	407	565	-158	-1723	-1942	-219
Sweden	-801	-783	+18	622	594	+28	-2525	-3333	-808
European Union	-633	-601	+32	579	607	-28	-1574	-2113	-539



List of Banks in EBA 2025 ST

Name of Banks and their respective countries

Country	Bank Name
AT	Erste Group Bank AG
AT	Raiffeisen Bank International AG
BE	Belfius Banque SA
BE	KBC Group NV
DE	Bayerische Landesbank
DE	Citigroup Global Markets Europe AG
DE	COMMERZBANK Aktiengesellschaft
DE	Deutsche Bank AG
DE	DZ Bank AG Deutsche Zentral-Genossensch
DE	Goldman Sachs Bank Europe SE
DE	J.P. Morgan SE
DE	Landesbank Baden-Württemberg
DE	Landesbank Hessen-Thüringen Girozentrale
DE	Morgan Stanley Europe Holding SE
DE	Norddeutsche Landesbank -Girozentrale-
DE	Volkswagen Financial Services AG
DK	Danske Bank A/S
DK	Jyske Bank A/S
DK	Nykredit Realkredit A/S
ES	Banco Bilbao Vizcaya Argentaria, S.A.
ES	Banco de Sabadell, S.A.
ES	Banco Santander, S.A.
ES	Bankinter, S.A.
ES	CaixaBank, S.A.
ES	Unicaja Banco, S.A.
FI	Nordea Bank Abp
FI	OP Osuuskunta
FR	BNP Paribas S.A.
FR	BofA Securities Europe SA
FR	Confédération Nationale du Crédit Mutuel
FR	Groupe BPCE
FR	Groupe Crédit Agricole
FR	HSBC Continental Europe
FR	La Banque Postale
FR	Société Générale S.A.

Country	Bank Name
GR	ALPHA SERVICES & HOLDINGS S.A.
GR	National Bank of Greece S.A.
GR	PIRAEUS FINANCIAL HOLDINGS S.A.
HU	OTP Bank Nyrt.
IE	AIB Group plc
IE	Bank of America Europe Designated Activity
IE	Bank of Ireland Group plc
IE	Barclays Bank Ireland PLC
IE	Citibank Europe plc
IT	BANCA MONTE DEI PASCHI DI SIENA S.p.A.
IT	Banco BPM S.p.A.
IT	BPER Banca S.p.A.
IT	ICCREA Banca S.p.A. – Istituto Centrale del (
IT	Intesa Sanpaolo S.p.A.
IT	UniCredit S.p.A.
NL	ABN AMRO Bank N.V.
NL	Coöperatieve Rabobank U.A.
NL	ING Groep N.V.
NO	DNB BANK ASA
PL	Bank Polska Kasa Opieki S.A.
PL	Powszechna Kasa Oszczednosci Bank Polski
PT	Banco Comercial Português, SA
PT	Caixa Geral de Depósitos, SA
RO	Banca Transilvania
SE	Länsförsäkringar Bank AB (publ)
SE	SBAB Bank AB – group
SE	Skandinaviska Enskilda Banken — group
SE	Svenska Handelsbanken — group
SE	Swedbank — group



Authors



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Clients include global financial services firms, investment bank, regional banks, insurance companies, asset managers and hedge funds



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Has led multiple Stress tests, overseeing planning, data and results analysis

Specializes in Financial Institutions. Primary areas of expertise are Financial & Strategic Planning, Restructuring and Performance Improvement.

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Gonzalo Álvarez

Associate

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Alvarez & Marsal

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