

Decision of the European Banking Authority EBA/DC/646

of 21 April 2026

concerning reimbursements and allowances for external persons

The Management Board

Having regard to Regulation (EU) No 1093/2010 of the European Parliament and of the Council of 24 November 2010 establishing a European Supervisory Authority (European Banking Authority, EBA), amending Decision No 716/2009/EC and repealing Commission Decision 2009/78/EC¹, in particular Articles 37 and 58 thereof,

Having regard to the Financial Regulation of the European Banking Authority of 6 June 2019, and in particular Articles 77 thereof,

Whereas:

- (1) The previous policy on the reimbursement of travel and subsistence expenses for external persons was last amended on 25 June 2020 and requires a review.
- (2) The revision aims to further harmonise reimbursement practices across the European Supervisory Authorities (European Banking Authority, European Insurance and Occupational Pensions Authority and European Securities and Markets Authority) ensuring consistency in reimbursement for external persons.

Has decided as follows:

Article 1 – Scope

1. This decision defines provisions for reimbursement and allowances provided by the EBA to external persons specified below:
 - Members of the Banking Stakeholder Group (BSG) acting as, or representing, consumers, users of banking services, independent top-ranking academics, SMEs or employees (trade-union representatives).
 - Members and Alternates of the Board of Appeal (BoA) of the ESAs appointed by the EBA.

¹ OJ L331, 15.12.2010, p. 12.

- Guest speakers invited by the EBA for workshops, conferences, hearings or similar.
 - Guest speakers at any seminar or training organized by the EBA.
 - Persons seconded by other institutions or competent authorities for short-term assignments at the EBA.
 - Persons that are members of a consumer organisation or body that is officially recognised (i.e. official and/or registered) in their respective country, and can identify themselves as such and attending the Joint ESAs' meetings or events.
 - Former staff members and other persons invited for a hearing in the context of proceedings according to the Decision laying down general implementing provisions on the conduct of administrative inquiries and disciplinary proceedings; or
 - Persons responsible for accompanying a disabled person whom the EBA has invited to attend a meeting.
2. The EBA shall provide allowances to the Members of the BSG eligible within the scope of this Decision for their attendance at BSG meetings.
 3. The EBA shall remunerate the Members and Alternates of the BoA for their participation in appeal cases and annual BoA meetings at an hourly rate. Members and Alternates of the BoA are entitled to reimbursement of travel and accommodation expenses in relation to exceptional ad-hoc meetings, subject to 'joint' invitation by the ESAs. Remuneration at the hourly rate does not apply in the case of the exceptional ad-hoc meetings. This includes participation in conferences and events organised by the ESAs that are of relevance to the Board of Appeal.
 4. The EBA shall reimburse the travel and accommodation expenses of external persons invited to EBA events on a case-by-case basis. If the external person is a staff member of an EU institution or agency, EBA may agree to reimburse directly to the EU institution or agency upon presentation of a debit note. In such a case, it is understood that the expert will apply in its entirety the mission rules of its institution or agency.
 5. When the EBA is hosting the annual Joint ESAs Consumer Protection Day, the EBA shall reimburse the travel and accommodation expenses of attending consumer representatives. Where necessary to adjust or supplement the rules in this Decision, the EBA may issue a dedicated reimbursement decision for that occasion.

Article 3 – Travel expenses

1. EBA is European Eco-Management and Audit Scheme (EMAS) certified. In line with EMAS, for necessary travel, preference is given to sustainable travel options and external persons invited to EBA meetings/trainings/events are encouraged to:

- Travel by train instead of plane, when possible, particularly for journeys of up to 500 km from the point of departure to the meeting location.
- Use direct connections and low-emissions travel in case of travel by air.
- Use eco-friendly hotels.

The EBA shall endeavour to ensure that events are organised in such a way as to enable external persons attending the events to benefit from economical travel rates.

2. To take advantage of the best rates available, for meetings/trainings/events organised well in advance and which are unlikely to be cancelled, tickets should be booked at the earliest opportunity (preferably no later than 2 weeks) before the date indicated in the agenda of the meeting/training/event being attended. EBA may ask to provide a justification for bookings made at short notice. For the purpose of this Decision, 'point of departure' means the place of residence or place of current employment of the external person and it is the basis for calculating the travel costs eligible for the reimbursement. If the place of residence and the place of current employment are in the same country, the place of residence will be taken as the point of departure. If the place of residence and the current place of employment are in different countries, the shortest distance to the place of meeting / venue will be taken as the point of departure. By way of derogation from this definition, prior to travel the EBA may authorise the external person to nominate a different point of departure.
3. The EBA's shall reimburse travel expenses from point of departure to the meeting location and back, by the most appropriate means of transport given the distance involved. The following travel expenses shall be reimbursed:
 - For travel by rail (excluding local transport), reimbursement shall cover a first-class ticket when two classes are available (first and economy), and a premium economy ticket when three classes are offered (first, premium economy, and economy). In both cases, seat reservation is reimbursable, and the tickets must be non-flexible.
 - For travel by air, reimbursement shall cover travel expenses for second-class economy, non-flexible tickets. If the journey by air involves a flight of 4 hours or more without stopovers, the cost of a business class ticket shall be reimbursed. Also, by way of exception, authorisation for travel in higher classes may be granted by EBA in duly justified exceptional cases and requested by the external person in advance. One small carry-on/cabin personal bag/item and one carry-on/cabin bag are reimbursable. The use of two or more different airlines for the same journey will only be permitted if the cost is equal to or lower than a direct flight or where appropriate. Regardless of the number of stopovers, flights are reimbursed up to the cost of the ticket of the most direct route between the point of departure and airports in the vicinity of the meeting venue.
 - For travel by private car, reimbursement shall be at the same rate as a rail ticket unless the route is not served by a train, in which case it shall be reimbursed at the rate per kilometre and in accordance with the ceilings established in the Decision of the EBA concerning the

application by analogy of Commission Decision on authorised travel (Guide to missions and authorised travel), as adopted by the Management Board. The travel distance shall be determined by the recommended road distance, as calculated by using a web-based tool for calculating distances, for example Michelin.

- Any additional cost (re-booking fees, etc.) will be reimbursed by EBA, when changes to meeting/training/event arrangements are introduced by EBA. In case of a justified cancellation of a travel due to unforeseen circumstances, the travel and accommodation costs incurred will be reimbursed upon presenting the proof that the relevant travel/accommodation company has been contacted and confirmed that the refund is not possible. If the refund of costs is partially possible (such as airline taxes, hotel accommodation cancellation fee percentage), EBA will reimburse only the difference to the full amount and up to the applicable ceiling.
- Airport transfers by public transport that are subject to additional airport transfer fee (such as express bus or train) are beyond the regular local public transport fees.

4. EBA will not reimburse the following travel expenses:

- Travel expenses where the distance between the point of departure and the place of the meeting is 50 km or less.
- Taxi fares, charges for car rental and parking fees. In cases where using public transport is not reasonable or highly problematic due to the time or safety reasons, the external person may request in advance a derogation for taxi use prior to the travel. The authorisation will be granted in duly justified, exceptional cases.
- Local public transport costs.
- Travel agency fees.
- Excess luggage fees.

5. Travel expenses shall be reimbursed in case of in-person meetings upon presentation of supporting documents: travel tickets and invoices, as well as electronic versions of online bookings/reservations and boarding passes for the outward and inward journey. The documents provided must show the name of passenger, the class of travel used, the departure and arrival time and the amount paid. In case of travel by private car, the external person must provide the calculation from the point of departure to EBA and receipts proving the use of the car (toll payments/petrol receipts).

Article 4 – Accommodation expenses

1. An accommodation allowance is granted in case of in-person meetings/trainings/events when the distance between the point of departure and the place of meeting/training/event venue is more than 50 km.

1. The number of nights reimbursed by EBA may not exceed the number of meeting days. However, if no return flight or train is available to the external person's point of departure after the conclusion of the meeting/training/event on the final day, the external person may request an exception (derogation) for reimbursement of one additional night of accommodation. Such an exception must be requested by the external person in advance, providing relevant print screens showing no available return flight/train.
2. The room rate (including breakfast and any compulsory local taxes) is reimbursed in accordance with the ceilings established in the Guide to missions and authorised travel, as adopted by the Management Board, for the city where the event/meeting/training is taking place.
3. The accommodation allowance is paid upon presentation of supporting documents (a hotel invoice/bill). Items/services such as mini bar, laundry, other meals apart from breakfast, etc. shall not be reimbursed.
4. The reimbursement of accommodation expenses applies only to the city of the meeting. It does not apply to the city of residence or employment.
5. Accommodation costs at stopover locations will only be granted in exceptional cases with the pre-approval of EBA.

Article 5 – Daily subsistence allowance

1. A daily subsistence allowance is granted in case of in-person meetings/trainings/events when the distance between the point of departure and the meeting venue exceeds 50 km. This allowance is provided for each day of the meeting, in accordance with the ceilings established in the Guide to missions and authorised travel.
2. The allowance is intended to cover expenses such as:
 - Meals
 - Local transportation (e.g., bus, tram, metro, taxi, parking fees, tolls)
3. If the meeting duration is four (4) hours or less, external persons will receive 50% of the daily subsistence allowance.
4. When lunch and/or dinner is provided during the meeting/training/event, a 25% deduction per lunch and/or dinner will be applied to the daily subsistence allowance.

Article 6 – Allowances for eligible members of the EBA Banking Stakeholder Group

5. The allowance of the BSG members within the scope of this Decision for participating in a BSG meeting shall be:

- EUR 220 preparatory allowance per official one- or two-day meeting, online or in-person (BSG and/or Joint Board of Supervisors (BoS)/BSG). Preparatory allowance is paid only once per meeting irrespective of the meeting length and whether it is joint with BoS meeting, given that the expert has attended the actual meeting.
 - EUR 220 per full day of meeting attendance online or in-person. For meetings lasting four (4) hours or less, 50% of the daily rate applies. For meetings longer than one day, the reimbursement is calculated proportionally (e.g., EUR 330 for one-and-a-half days, EUR 440 for two full days).
 - EUR 220 for follow-up work per official one- or two-day meeting, online or in-person (BSG and/or Joint BoS/BSG). The follow-up work allowance is paid only once per meeting irrespective of the meeting length and whether the meeting is a joint meeting with the BoS.
6. The combined sum of travel and accommodation expenses, daily allowances, and BSG allowances received by a member of the BSG shall not exceed EUR 10,000 in any calendar year.
7. The allowances (daily subsistence allowance, BSG allowances) do not apply to meetings of the sub-structures or sub-groups of the BSG.
8. Allowance payments for eligible members participating in online meetings will be automatically calculated and processed by EBA based on the official participation report. Reimbursement forms will no longer be required. It is the responsibility of each member to notify EBA prior to the meeting if:
- Their bank account details have changed
 - They choose not to receive the allowance.

Article 7 – Remuneration of members and alternates of the Board of Appeal

9. . The remuneration of members and alternates participating in an appeal case shall be 100 EUR per hour, with a maximum of 8,000 EUR per case.
10. The remuneration of the President nominated to preside over a case of the BoA and the Rapporteur shall be EUR 125 per hour, with a maximum of EUR 20,000 per case.
11. The remuneration of members and alternates in for their participation in regular meetings shall be EUR 100 per hour.

Article 8 – Allowances for consumer representatives and other experts attending Joint European Supervisory Authorities' (ESAs) meetings or events

1. A financial contribution may be granted to consumer representatives and other experts, subject to a joint invitation by the ESAs, in which specific reimbursement provisions will be detailed.

Article 9 – Payments

1. The payment order shall be drawn up on the basis of a request for reimbursement, duly completed and signed by the external person and endorsed by the rapporteur/organiser of the meeting, responsible for certifying the external person's presence. If the rapporteur is not a member of the EBA's staff, the rapporteur shall send a confirmed list of participants to the EBA co-ordinator and request that participants submit expenses directly to the EBA co-ordinator. The EBA co-ordinator shall not authorise payment if the rapporteur has not confirmed the external person's participation.
2. External persons attending in-person meetings must provide EBA with the documents necessary for their reimbursement by email only, to the designated email address mentioned in EBA's request for reimbursement form, no later than 30 calendar days after the final day of the meeting. The completed file should consist of:
 - a duly filled-in reimbursement form.
 - if applicable, an Identification Form for Natural Person containing bank account details; and
 - scanned/electronic supporting documents for reimbursement (and if necessary, any additional justification). Although EBA accepts scanned supporting documents, it still reserves the right to ask for originals, which must be kept by the external person, at least, until the reimbursement has been fully processed by EBA.
3. EBA staff responsible for the reimbursement shall scrutinise any request for reimbursement and have the right to carry out any checks that might be needed as well as request any proof from the external persons required for this purpose. The EBA reserves the right, where it appears to be justified, to limit the reimbursement.
4. The EBA aims at reimbursing the external person within 30 calendar days from the reception by EBA of the completed reimbursement request.
5. Failure to comply with the requirement to provide documents necessary for reimbursement will absolve EBA from any obligation to reimburse travel expenses or pay any allowances. Amounts due under the above rules shall be paid by a bank transfer in euro. Amounts shall be converted where appropriate at the rate of exchange applying on the day of the meeting using the monthly conversion rates on the European Commission's InforEuro website.
6. Payments to accounts outside the eurozone may be subject to exchange rate variations and the account holder may be subject to shared costs for bank charges.

Article 10 – Liability

1. The EBA shall not be liable for any material, non-material or physical damage suffered by invited external persons or those responsible for accompanying them (such as the case for a person
-

with disabilities) in the course of their journey, unless such harm is directly attributable to the EBA.

2. Invited persons using their own means of transport for travelling to such meetings shall be entirely liable for any accidents they might cause.
3. Where, considering any expenses incurred by persons with disabilities as a result of their disability or any accompanying person, the allowances provided for in this policy appear to be clearly inadequate, the additional expenses may be reimbursed by the EBA upon presentation of supporting documents.

Article 11 – Final provisions

1. The Decision of the Management Board of 25 June 2020 concerning reimbursements and allowances for external persons (EBA/DC/2020/342) is hereby repealed.
2. This Decision enters into force immediately.

Done at Paris,

François-Louis Michaud
Chairperson
For the Management Board