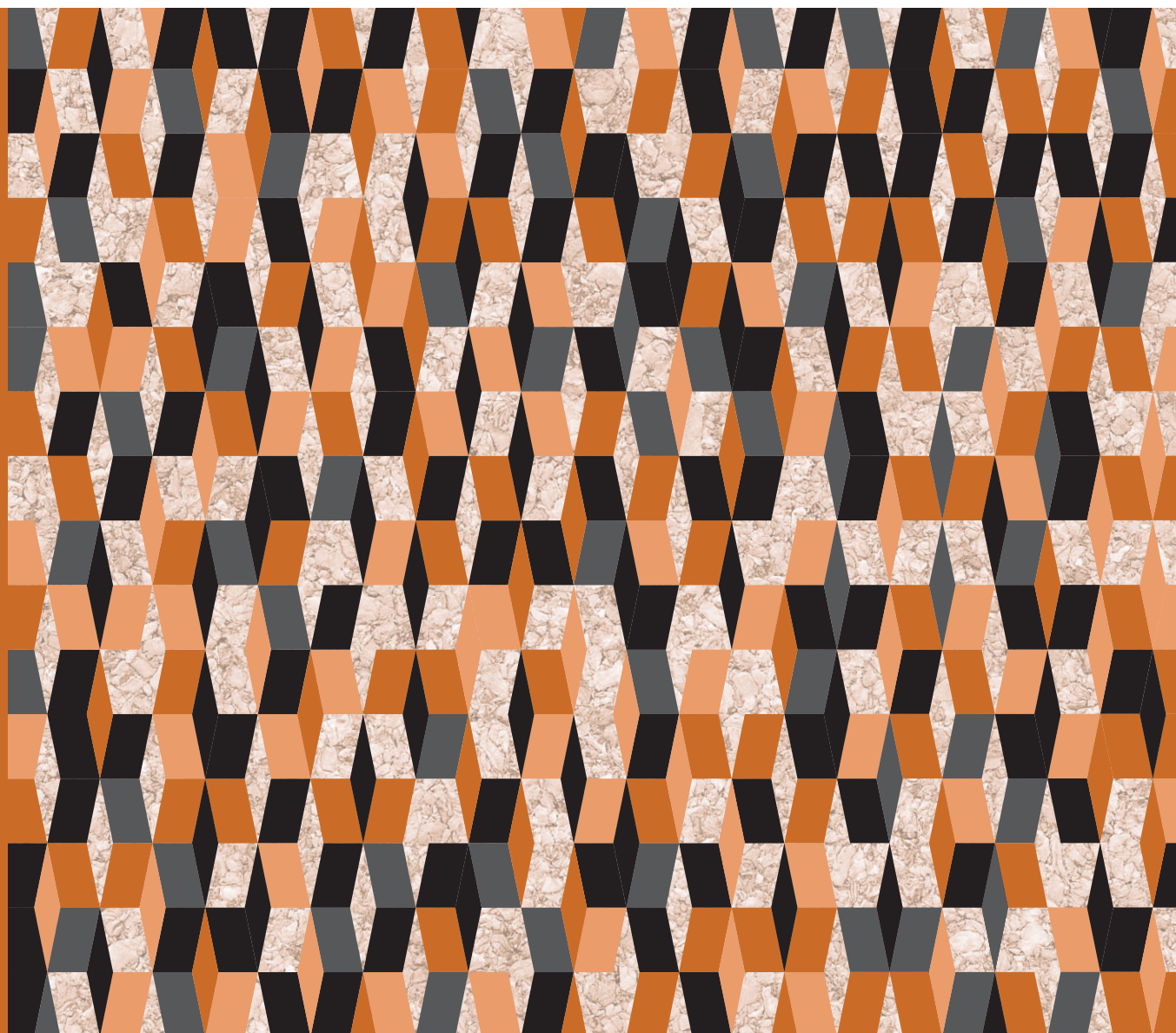


Banking Conduct Supervision Report 2015



BANCO DE PORTUGAL
EUROSYSTEM



BANKING CONDUCT SUPERVISION REPORT

2015

Excerpt from the Banking Conduct
Supervision Report 2015



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Executive summary

In the 2015 Banking Conduct Supervision Report, Banco de Portugal:

- Highlights the challenges faced by banking conduct supervision due to the growing use of the new digital channels in banking activities, more specifically as regards the safeguard of data security conditions and compliance of information submitted by supervised entities with transparency rules (Chapter I);
- Outlines developments in the regulatory framework governing retail banking markets, referring to the new customer rights in the sale of products and services (Chapter II);
- Presents the results of the implementation of arrears regimes in the prevention and settlement of over indebtedness on mortgages and consumer loan agreements with household customers (Chapter III);
- Outlines the financial information and education projects carried out by Banco de Portugal (Chapter IV);
- Describes Banco de Portugal's monitoring of credit institutions, the correction of detected irregularities and the sanctioning of more serious breaches (Chapter V);
- Summarises legal and regulatory initiatives, activities on the international agenda and international cooperation activities in which Banco de Portugal was involved (Annex).

Challenges posed by the new digital channels to banking conduct supervision

In the exercise of its banking conduct supervision functions, Banco de Portugal has monitored the increasing use of the new digital channels by bank customers, in parallel with the growing provision of digital banking services by financial institutions.

Access to retail financial services through digital channels poses new channel-specific risks (technological and operational risks) to their

users, in addition to those underlying the purchased financial products themselves.

In this report, Banco de Portugal presents a reflection on the challenges posed by the new digital channels to banking conduct supervision, most notably those related to security, to the nature of products and to the transparency in the information provided by institutions.

The analysis and discussion of the mitigation of such risks, mainly as regards mobile and online payment services has been at the forefront of the agenda of several regulatory, supervisory and oversight authorities, as well as international bodies and fora.

In the performance of its regulatory, banking conduct and financial education tasks, Banco de Portugal is involved in international fora focusing on the digital ecosystem and innovative financial services. The International Financial Consumer Protection Organisation (FinCoNet) has played a pioneer role, with the creation of a working group in 2014, which is chaired by Banco de Portugal, to review banking conduct supervision challenges associated with the mitigation of security risks when making online and mobile payments.

This reflection is aimed at identifying efficient supervisory practices in terms of prevention of security risks associated with innovative payments and the monitoring of information provided by institutions so as to protect bank customers more efficiently.

Well-informed bank customers tend to be more aware of risks in using the new digital channels and more receptive towards the adoption of practices to mitigate such risks. Consumer awareness campaigns regarding digital financial education and security procedures are crucial and have been developed by several supervisory authorities and Banco de Portugal. At international level, paramount for the reflection on the implications of digital financial services to financial education and inclusion is the work of the International

Network on Financial Education (INFE) of the Organisation for Economic Co-Operation and Development (OECD), of which Banco de Portugal is a member.

Developments in the regulatory framework of retail banking markets

The basic bank account regime was revised further in 2015, on the initiative of the Portuguese Parliament, with the purpose of improving access to this type of accounts. Furthermore, all credit institutions are now obliged to provide these basic bank accounts.

Also on the initiative of the Portuguese Parliament, legal principles were established regarding fees charged by credit institutions. The same legal act also introduced the prohibition on levying fees on cheques returned to their beneficiary.

Caps were established on interchange fees for card-based payment transactions, through implementation of European regulations, which also introduced information requirements for institutions regarding payees (i.e. merchants).

In July 2015 entered into force new rules, established by Banco de Portugal, concerning information to be provided by credit institutions on consumer credit agreements. These rules require institutions to send their customers a regular and detailed statement.

With the purpose of making online transactions more secure, Banco de Portugal issued a number of recommendations to national payment service providers on the security of internet payments in accordance with the EBA Guidelines on the security of internet payments.

Banco de Portugal also supplied payment service providers with a number of best practices on the information to be provided to customers on contactless cards.

In 2015 the EBA published guidelines establishing good practices for mortgage creditworthiness assessments and arrears and foreclosure. The EBA also published guidelines on product oversight and governance arrangements for retail banking products.

Implementation of arrears regimes

Banco de Portugal continued to monitor the prevention and settlement of arrears on household credit agreements under the general and extraordinary arrears regimes. For that purpose, the Bank analysed the data reported on a monthly basis by institutions, conducted inspections on institutions and analysed complaints from bank customers.

In 2015 the Out-of-court Arrears Settlement Procedure (OASP) covered a greater number of bank customers, mostly under the scope of the consumer credit regime.

The concluded OASP credit agreements with the settlement of arrears increased, due to a greater number of procedures concluded when bank customers settled their overdue debt.

The most commonly agreed solution under the OASP was the renegotiation of credit agreements, mainly through the introduction of a grace period for principal and/or interest and the payment of a residual value in the last instalment.

Banco de Portugal continued to provide support to the Assessment Committee on the Extraordinary Regime, which was in force up to 31 December 2015, as provided by law. Data for 2015 on the implementation of the extraordinary regime confirmed the limited impact of this regime, as a result of the number of requests for access submitted by customers, the share of requests that met with the required access conditions and the number of arrears settled following its implementation.

Financial information and education

In 2015, the Bank's action in the dissemination of financial information focused again on the Bank Customer Website ("Portal do Cliente Bancário"), while financial education initiatives proceeded with a wide set of training courses supported by the regional network of Banco de Portugal. The most commonly discussed topics in these courses were the importance of saving, household budget planning, precautions to observe when taking out credit,

bank accounts and means of payment, and fraud prevention. Banco de Portugal continued to cooperate with the Assistance Network of Indebted Consumers (ANIC) to develop financial information and education initiatives to raise awareness on legislation governing arrears prevention and management and minimum banking services.

Banco de Portugal also continued to play an active role in the National Plan for Financial Education, together with the Portuguese Securities Market Commission and the Portuguese Insurance and Pension Funds Supervisory Authority, in the scope of the National Council of Financial Supervisors.

At international level, Banco de Portugal actively participated in the INFE/OECD work and fostered closer cooperation with the central banks of Portuguese-speaking countries.

Following the 1st survey on the financial literacy of the Portuguese population in 2010, Banco de Portugal carried out its 2nd survey in 2015, jointly with the Portuguese Securities Market Commission and the Portuguese Insurance and Pension Funds Supervisory Authority. This survey also included questions set out by the OECD/INFE, with the purpose of integrating the National Plan in its international survey.

Supervision activities

In 2015 Banco de Portugal employed more resources to monitor advertising campaigns, as a result of an increase in the number of advertising campaigns by credit institutions on their banking products and services (16 per cent compared with 2014).

The number of information leaflets on indexed and dual deposits submitted to Banco de Portugal for prior inspection also increased, by 18.7 per cent from 2014, reflecting a rise in the number of deposits sold by a greater number of institutions.

Banco de Portugal also assessed compliance with maximum rates, based on information reported on consumer credit agreements (around 1.5 million agreements), 7 per cent more than in 2014.

Inspections carried out in 2015 focused on consumer credit, given that this market has become increasingly buoyant, particularly in the car loans and credit cards segments.

Special prominence was given to compliance with the maximum rate regime through inspections of the central services of institutions to check for compliance with the calculation of the annual percentage rate of charge as well as the procedures and systems in place. With these measures, Banco de Portugal supplemented its monitoring tasks with the analysis of data on new agreements reported on a monthly basis.

Compliance with the duty of providing pre contractual information and support to bank customers, in the sale of consumer credit, deposits and payment instruments, were also a priority for the Bank. For that purpose, more inspections were carried out to at the premises of credit institutions, involving a greater number of institutions and across a larger part of the Portuguese territory than in 2014. In terms of consumer credit, this also included points-of-sale that act as agents for institutions (e.g. large supermarkets and department stores, and car dealers).

In its inspections of central services, Banco de Portugal continued to assess compliance with the regulatory framework applicable to arrears and default on household credit agreements. This also stemmed from a previous assessment by Banco de Portugal, based on the analysis of complaints and requests for information submitted by bank customers and data reported by institutions on a monthly basis.

Following changes to the basic bank account regime, Banco de Portugal assessed its implementation, by checking information provided by institutions in their price lists and websites, particularly in the Standardised Information Sheet of the minimum banking services account.

The calculation of the interest rate on credit operations with a floating rate was also monitored by Banco de Portugal, in the scope of its Circular Letter No 26/2015/DSC.

In 2015, Banco de Portugal received 13,487 bank customer complaints against credit institutions, 5 per cent fewer than in the previous year. Excluding deposit accounts, where complaints increased, this decline was broadly based across most products, with complaints being particularly substantial regarding the prevention and settlement of arrears.

In the wake of its monitoring tasks, Banco de Portugal issued 1,034 recommendations and specific orders requiring 62 institutions to correct the irregularities detected. It also initiated 215 administrative proceedings against 45 institutions to penalise infringements on applicable supervision rules.

The recommendations and specific orders issued in 2015 mainly stemmed from inspections conducted by Banco de Portugal (77 per cent), with the analysis of bank customer complaints accounting for 11 per cent, the monitoring of price lists 6 per cent and the analysis of advertising campaigns also 6 per cent.

The administrative proceedings initiated in 2015 mainly resulted (74 per cent) from the analysis of bank customer complaints. A single administrative proceeding may be initiated on the basis of more than one complaint.

Banking conduct supervision in numbers – 2015

Arrears regime monitoring:

- Information analysed on 701,685 procedures under the OASP on housing credit and consumer credit agreements;
- Information analysed on 531 requests for access to the extraordinary regime;
- 707 complaints received on issues pertaining to the arrears regimes, 19 of which on the extraordinary regime;
- 61 information requests on arrears received from bank customers;
- 5 inspections of the central services regarding the general arrears regime.

Systematic monitoring:

- Monitored 1,228 price lists (702 fees and expenses leaflets and 526 interest rate leaflets) of 102 institutions;
- Analysed 7,603 advertising campaigns of 62 institutions;
- Conducted prior inspections of 260 information leaflets on indexed and dual deposits offered by 17 institutions;
- Checked the calculation of returns on 187 matured indexed and dual deposits;
- Assessed compliance with maximum rates, based on information reported by 55 institutions on 1,475,993 consumer credit agreements.

Inspections conducted:

- 467 inspections of branches of 35 institutions, of which 282 were 'mystery shopping' actions and 185 were on-site identified inspections;
- 23 inspections of the central services of 9 institutions;
- 525 off-site inspections of 86 institutions.

Complaints management:

- 13,487 complaints received, a monthly average of 1,124;
- 64 per cent of complaints closed with no signs of breach.

Information requests:

- 2,673 information requests received from bank customers, a monthly average of 223.

Correction of irregularities and sanctions:

- 1,034 specific orders issued requiring 62 institutions to correct irregularities;
- 215 administrative proceedings initiated against 45 institutions for breach of rules.





III

Implementation of the arrears regimes

1. Arrears general regime
2. Arrears extraordinary regime
3. Assistance Network for Over-indebted Consumers

In 2015, Banco de Portugal continued to supervise the performance of credit institutions in the framework of the implementation of the general¹ and extraordinary arrears regime² namely through inspections and the analysis of bank customer complaints. Banco de Portugal also continued to monitor the implementation of the arrears regimes based on data reported by credit institutions on the contracts covered by the OASP and by the extraordinary regime. This data report, carried out in compliance with regulatory standards of Banco de Portugal³, also enabled the supervision of credit institutions, complementing the supervision done through inspections and customer complaints analysis.

In 2015, the number of bank customers covered by the general arrears regime increased, in a context where the level of arrears situations concerning credit agreements by households remained high. In comparison with 2014, the increase in the number of OASP processes opened by credit institutions was visible both in housing credit and other loans secured by mortgage as well as in the consumer credit segment.

Most of the credit agreements included in the OASP had to do with consumer credit debts, notably of revolving credit agreements and, in this segment, the debts resulting from credit cards use. On the other hand, with regard to the amount of credit involved, the greater weight is associated with housing credit and other loans secured by mortgage.

The effectiveness of the OASP, reflected in the ratio of procedures concluded with the settlement of arrears, went up in the housing credit and other loans secured by mortgage segment, chiefly due to the increase in procedures in which the amounts overdue were paid by bank customers. Similarly, there was an increase in the number of procedures under the OASP in the consumer credit segment that were concluded after customers paid the outstanding amounts, although the ratio of procedures concluded with the settlement of the arrears decreased.

The data on the number of proceedings concluded with the payment of amounts in arrears

reveal the importance of prompt action by credit institutions after verifying that bank customers failed to comply with the obligations arising from their credit agreements. It is recalled that, in addition to the duties to which they are bound in a pre-default phase, in the framework of the Pre-arrears Action Plan (PRAP), credit institutions are obliged to integrate bank customers in the OASP between the 31st and 60th days subsequent to non-payment of an instalment. The start of the OASP may take place even earlier if defaulting customers request it or if customers proactively warned credit institutions of their financial difficulties.

It should also be borne in mind that, frequently, credit institutions and bank customers agree on solutions to settle default situations after the OASP has expired. Therefore, the data relating to the agreements concluded within the OASP do not reflect all the solutions established between credit institutions and customers in order to settle arrears situations.

With regard to the solutions agreed by the parties during the OASP, a preponderance of the renegotiation of the terms and conditions of credit agreements continued to exist, particularly, for housing credit and other loans secured by mortgage, the introduction of grace periods for principal and / or interest and, for consumer credit, deferring payment of part of principal until the last instalment. The weight of renegotiation over other types of solutions, such as the consolidation of credit, the granting of additional loans for payment of instalments or refinancing, may also be related to the fact that the OASP takes place at an early stage of non-compliance.

On the other hand, the extraordinary arrears regime continued to have a limited impact in 2015, despite the changes introduced by the legislator in September 2014. In fact, the year 2015 had the lowest number of requests for access submitted by bank customers since the entry into force of this regime on 9 November 2012. The sharp drop in the percentage of proceedings concluded with the settlement of arrears situations is also highlighted.

Under the terms legally established, the validity period of the extraordinary regime ended on 31 December 2015, with the regime applicable only to customers who requested access by that date.

The Assistance Network for Over-indebted Consumers continued its activity to support bank customers at risk of default and delay in complying with credit agreements, either by providing information and clarifying doubts, or

by accompanying and supporting them in the process of negotiating with credit institutions. It should be noted that the activity developed by these entities, which must comply with legal requirements of competence, repute and independence, does not imply any costs for bank customers. The activity carried out by the Assistance Network for Over-indebted Consumers is monitored and evaluated by the Directorate-General for Consumer Affairs.

Table III.1 • Settlement of arrears under the OASP and the extraordinary regime
| 2013-2015

	2013	2014	2015	Total
General regime – OASP				
Housing credit and other loans secured by mortgage				
OASP proceedings initiated	181 655	123 594	132 108	437 357
OASP proceedings concluded	165 406	118 214	129 013	412 633
OASP proceedings concluded with settlement of arrears ^(a)	69 516	71 198	85 238	225 952
OASP proceedings concluded with settlement of arrears / OASP proceedings concluded	42,0 %	60,2 %	66,1 %	54,8 %
Consumer credit				
OASP proceedings initiated	657 948	539 041	569 577	1 766 566
OASP proceedings concluded	590 642	508 209	572 664	1 671 515
OASP proceedings concluded with settlement of arrears ^(a)	198 636	226 955	242 298	667 889
OASP proceedings concluded with settlement of arrears / OASP proceedings concluded	33,6 %	44,7 %	42,3 %	40,0 %
Extraordinary regime				
Requests for access granted	361	133	137	631
Extraordinary regime proceedings concluded	271	155	139	565
Extraordinary regime proceedings concluded with settlement of arrears ^(a)	161	97	54	312
Extraordinary regime proceedings concluded with settlement of arrears / Proceedings concluded	59,4 %	62,6 %	38,8 %	55,2 %

Note: (a) Proceedings concluded for one of the following reasons: payment of amounts in arrears, renegotiation of the credit agreement, credit consolidation agreement, refinancing of the credit agreement, granting of an additional loan to pay the instalments, payment in *lieu*.

In the exercise of its legal powers, throughout the year Banco de Portugal permanently and systematically monitored the implementation of arrears regimes by credit institutions. Of note were the activities carried out in the supervision of the implementation of the general regime, namely through several inspections to the central services of credit institutions and

the analysis of bank customer complaints. For an analysis of the supervision developed by Banco de Portugal in this scope, reference is made to the items related to the inspections, analysis of customer complaints and correction of irregularities and sanctions contained in chapter V.

1. Arrears general regime

In 2015, credit institutions developed 701 685 OASP proceedings, involving a total of 493 230 credit agreements, with a total outstanding amount of around EUR 5.3 billion and a default ratio of 4.1 per cent.

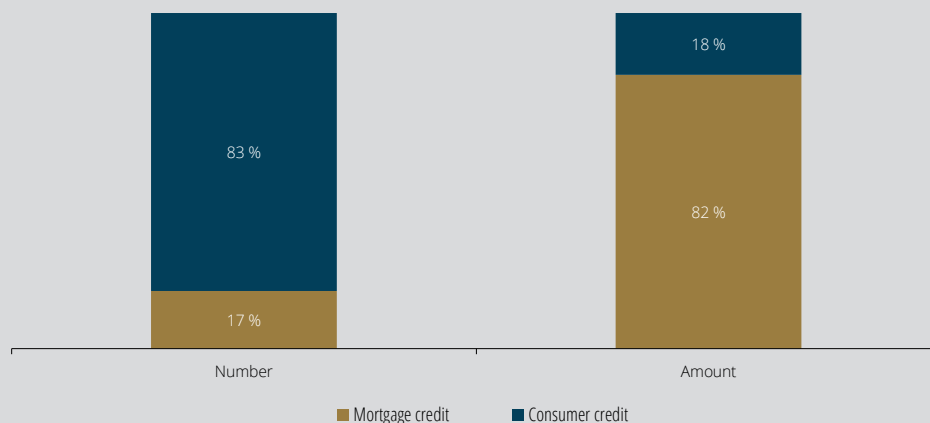
From the total of credit agreements under OASP, 17 per cent were mortgage credit⁴ and 83 per cent consumer credit agreements.

With regard to the total amounts owed to each type of credit, the structure is the opposite, with 82 per cent being mortgage credit and 18 per cent consumer credits, since mortgage agreements have significantly higher average values. These two distributions are very similar to those in previous years.

In the mortgage credit segment, 132 108 OASP proceedings were initiated in 2015, relating to 84 916 credit agreements, involving a total outstanding amount of approximately EUR 4.3 billion and a default ratio of 1.3 per cent.

In the same year, 129 013 OASP proceedings were concluded, relating to 75 181 mortgage agreements, which had a total outstanding amount of around EUR 3.8 billion and a default ratio of 1.9 per cent. At the end of December, 24,724 OASP proceedings related to mortgage agreements were being analysed or negotiated.

In relation to the conclusion of these proceedings, note should be taken of the increase in the proportion of OASPs related to mortgage agreements in which the amounts in arrears were paid (from 60.2 per cent in 2014 to 66.1 per cent in 2015), which was due to the increase in proceedings concluded after the payment of amounts in arrears.



Graph III.1.1 •
OASP
| Distribution of
credit agreements
in the OASP by
type of credit
| 2015

Table III.1.1 • OASP | Proceedings initiated, under analysis and concluded | Mortgage credit | 2013-2015

	Proceedings			Agreements ^(a)	
	2013	2014	2015	2015	2013-2015
OASP proceedings initiated					
Number	181 655	123 594	132 108	84 916	236 448
Total amount (million euro) ^(b)	–	–	–	4307,5	12 390,1
Default ratio ^(c)	–	–	–	1,3 %	3,7 %
OASP proceedings under analysis^(d)					
Number	16 249	21 629	24 724	–	–
OASP proceedings concluded					
Number	165 406	118 214	129 013	75 181	212 469
Total amount (million euro)	–	–	–	3849,8	11 210,9
Default ratio	–	–	–	1,9 %	4,0 %
Of which:					
OASP proceedings concluded with settlement of arrears^(e)	69 516	71 198	85 238	–	–
Payment of the amounts in arrears	58 258	64 615	80 325	–	–
Agreement reached between the parties ^(f)	11 258	6583	4913	–	–
OASP proceedings concluded with settlement of arrears / OASP proceedings concluded	42,0 %	60,2 %	66,1 %	–	–

Notes: (a) The total number of agreements integrated in the OASP does not reflect situations where the same credit agreement is integrated in the OASP more than once.

(b) The total amount corresponds to the sum of the amount outstanding in a regular situation with the amount in default (due).

(c) Ratio between the default amount (due) and the total amount.

(d) Amounts at the end of the period.

(e) Proceedings concluded for one of the following reasons: payment of the amounts in arrears, renegotiation of the credit agreement, credit consolidation agreement, refinancing of the credit agreement, granting of an additional loan to pay the instalments, payment in *lieu*.

(f) Renegotiation of the credit agreement; credit consolidation agreement; refinancing of the credit agreement; granting of an additional loan for the payment of instalments; and payment in *lieu*.

In the consumer credit segment, credit institutions initiated 569 557 OASP proceedings in 2015, relating to 408 314 credit agreements, which had a total outstanding amount of about EUR 970 million and a default ratio of 16.8 per cent. Approximately half (51.4 per cent) of

consumer credit agreements covered by the OASP in 2015 are credit cards, followed by personal credit agreements (21.7 per cent) and overdraft facilities (17, 5 per cent). Revolving credit accounted for 72.5 per cent of OASP proceedings initiated in 2015.

Graph III.1.2 • OASP | Distribution of credit agreements integrated in the OASP, by credit type | 2015

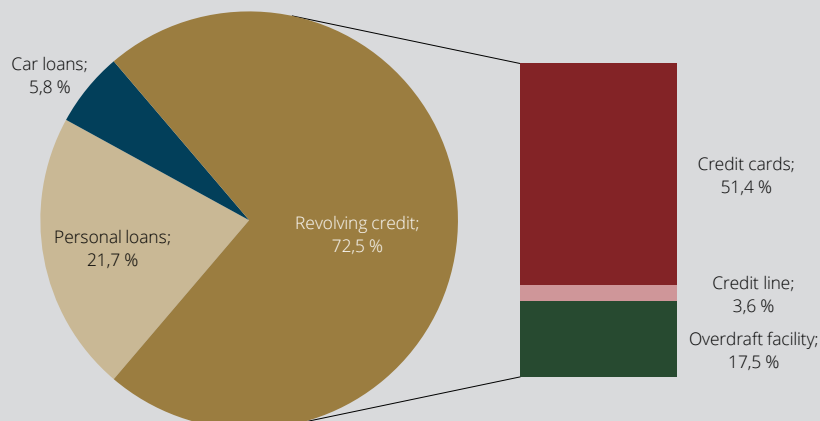


Table III.1.2 • OASP | Proceedings initiated, under analysis and concluded | Consumer credit | 2013-2015

	Proceedings			Agreements ^(a)	
	2013	2014	2015	2015	2013-2015
OASP proceedings initiated					
Number	657 948	539 041	569 577	408 314	1 190 290
Total amount (million euro) ^(b)	-	-	-	970,2	3344,7
Default ratio ^(c)	-	-	-	16,8 %	22,9 %
OASP proceedings under analysis^(d)					
Number	67 306	98 138	95 051	-	-
OASP proceedings concluded					
Number	590 642	508 209	572 664	400 936	1 094 108
Total amount (million euro)	-	-	-	996,8	3128,5
Default ratio	-	-	-	22,1 %	23,1 %
Of which:					
OASP proceedings concluded with settlement of arrears^(e)	198 636	226 955	242 298	-	-
Payment of the amounts in arrears	167 211	206 498	225 790	-	-
Agreement reached between the parties ^(f)	31 425	20 457	16 508	-	-
OASP proceedings concluded with settlement of arrears / OASP proceedings concluded	33,6 %	44,7 %	42,3 %	-	-

Notes: (a) The total number of agreements integrated in the OASP does not reflect situations where the same credit agreement is integrated in the OASP more than once.

(b) The total amount corresponds to the sum of the amount outstanding in a regular situation with the amount in default (due).

(c) Ratio between the default amount (due) and the total amount.

(d) Amounts at the end of the period.

(e) Proceedings concluded for one of the following reasons: payment of the amounts in arrears, renegotiation of the credit agreement, credit consolidation agreement, refinancing of the credit agreement, granting of an additional loan to pay the instalments, payment in *lieu*.

(f) Renegotiation of the credit agreement; credit consolidation agreement; refinancing of the credit agreement; granting of an additional loan for the payment of instalments; and payment in *lieu*.

In 2015, credit institutions concluded 572 664 OASP proceedings, relating to 400 936 consumer credit agreements, with a total outstanding amount of around a billion euro and a default ratio of 22.1 per cent. In contrast to mortgage credit, there was a drop in the proportion of OASP proceedings related to consumer credit agreements concluded with the settlement of arrears situations. Compared with 2014, in which 44.7 per cent of OASP proceedings were concluded with a settlement, in 2015 this ratio was 42.3 per cent.

At the end of December, 95 051 OASP proceedings involving consumer credit agreements were still being analysed or negotiated.

The grounds for extinction, in the mortgage credit segment, were essentially the increase in 2015 in the proportion of OASP proceedings concluded with the payment of the amounts in

arrears (from 54.6 per cent in 2014 to 62.3 per cent in 2015). In consumer credit, however, there was an increase in the proceedings concluded due to the impossibility of reaching an agreement between the parties during the OASP period (from 49.8 per cent in 2014 to 54 per cent in 2015), which was particularly pronounced in OASP proceedings relating to revolving credit.

In 2015, credit institutions and bank customers agreed to renegotiate credit agreements in 15,670 OASP proceedings, involving a total renegotiated amount of 199.4 million euro. Of these proceedings, 4,558 involved mortgage agreements, with a renegotiated amount of 179.1 million euro, and 11,112 concerned consumer credit agreements, with a renegotiated amount of 20.4 million euro.

In consumer credit, recourse to the refinancing of the credit agreement, adopted in 2,820 proceedings and involving a refinanced amount of about 18.8 million euro, and the consolidation

of credit, agreed in 1,631 proceedings and involving a total consolidated amount of around EUR 7.8 million, were the second and third most agreed solutions under the OASP.

Table III.1.3 • OASP | Solutions agreed in proceedings concluded | 2015^(a)

	Home loans	Consumer credit	Total
Renegotiation of the credit contract (number)	4558	11 112	15 670
<i>Renegotiated amount (million euro)</i>	<i>179,1</i>	<i>20,4</i>	<i>199,4</i>
Credit consolidation (number)	14	1631	1645
<i>Consolidated amount (million euro)</i>	<i>0,4</i>	<i>7,8</i>	<i>8,2</i>
Refinancing (number)	55	2820	2875
<i>Refinanced amount (million euro)</i>	<i>2,1</i>	<i>18,8</i>	<i>20,9</i>
Additional loan to pay instalments (number)	354	946	1300
<i>Credit amount (million euro)</i>	<i>1,8</i>	<i>6,8</i>	<i>8,6</i>
Payment in lieu (number)	27	19	46
Memo item: Number de agreements	4707	15 495	20 202

Note: (a) In this table the number of agreed solutions is presented; there may be more than one solution per contract.

With regard to the renegotiation of mortgage agreements, credit institutions and bank customers agreed to introduce grace periods for principal and / or interest in 1966 proceedings and the extension of the term in 726 proceedings.

In consumer credit agreements, deferring payment of principal to the last instalment and extending the contract term were the most frequently agreed changes in the renegotiations made under the OASP, involving 7,174 and 2,374 OASP proceedings, respectively.

Graph III.1.3 • OASP | Reasons for extinction | 2014-2015

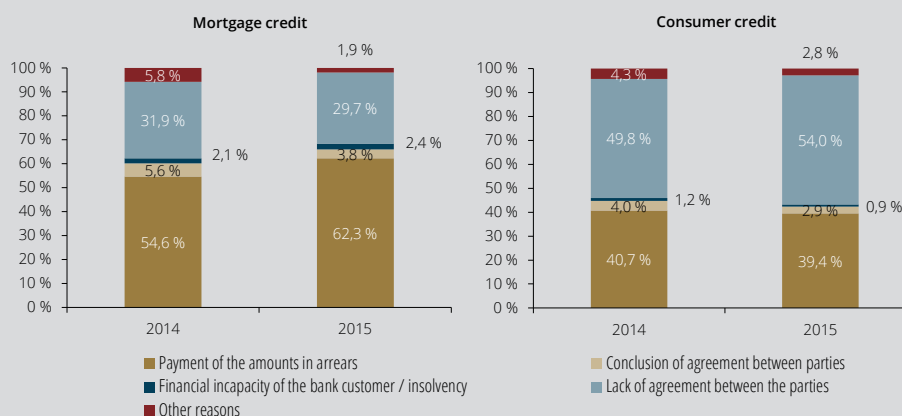


Table III.1.4 • OASP | Solutions agreed in renegotiated proceedings | 2015^(a)

	Mortgage credit	Consumer credit	Total
Spread / Interest rate	228	1716	1944
Term	726	2374	3100
Grace period of principal (and/or interest)	1966	504	2470
Deferring payment of principal to last instalment	477	7174	7651
Other conditions ^(b)	2768	1477	4245
Memo item: Number de agreements	3016	7048	10 064

Notes: (a) Renegotiations sometimes combine more than one of the solutions indicated in this table.

(b) This category includes, inter alia, payment plans for the settlement of overdue instalments, changes in the interest rate regime and changes in ownership. The reporting of all these options is done in aggregate form so it is not possible to disaggregate the renegotiated conditions included in this category.

2. Arrears extraordinary regime

2.1. Implementation of the extraordinary regime

Since the entry into force of the extraordinary regime on 10 November 2012, by the end of 2015, bank customers had submitted a total of 2983 requests for access to the regime relating to 2635 credit agreements distributed over 20 credit institutions.

The year 2015 recorded the lowest number of requests for access submitted by bank customers since the entry into force of the extraordinary regime, with only 531 requests for access. It should be noted that in 2014 there had already been a 66 per cent reduction in the number of requests for access submitted in comparison to the previous year's data.

Table III.2.1.1 • Extraordinary regime | Requests for access | 2013^(a)-2015

	Requests for access				Credit agreements ^(b)	
	2013 ^(a)	2014	2015	Total 2013 ^(a) -2015	Total 2013 ^(a) -2015	% of credit agreements
Requests for access (20 institutions)	1830	622	531	2983	2635	-
No. of requests under analysis ^(c)	35	32	32	-	-	-
Requests denied	1434	492	394	2320	1996	77 %
Requests granted	361	133	137	631	607	23 %
Housing credit	211	95	100	406	388	-
Other loans secured by mortgage	150	38	37	225	219	-
Proceedings concluded	271	155	139	565	-	-
With settlement of arrears	161	97	54	312	-	-
Proceedings concluded with settlement of arrears / Proceedings concluded	59,4 %	62,6 %	38,8 %	55,2 %	-	-

Notes: (a) Includes the period from 10 November to 31 December 2012.

(b) The total credit agreements do not reflect situations where the same credit agreement is subject to more than one request for access.

(c) Values at the end of the period.

Of the requests received in 2015, three refer to guarantors who requested access to the extraordinary regime, which compares with two requests received in the last quarter of 2014, after the entry into force of the amendments introduced by Law No. 58/2014 of 25 August, which have granted guarantors of home loan agreements access to the system.

In 2015, credit institutions denied 394 requests for access, as they did not meet the legally established conditions for access.

Since the beginning of the extraordinary regime, 2320 requests for access have been denied, relating to 1996 credit agreements (77 per cent of total credit agreements with requests for access deferred or denied).

The main reason for the denial of requests for access to the extraordinary regime in 2015 was the non-delivery by bank customers of the documents necessary to prove compliance with the access conditions (25.9 per cent). The second reason was the failure to meet the condition for a significant reduction (i.e. equal to or greater than 35 per cent) in the gross annual

household income (19.3 per cent), followed by the fact that the credit for which access to the extraordinary regime was requested is not intended to finance the permanent residential property of borrowers (13.5 per cent).

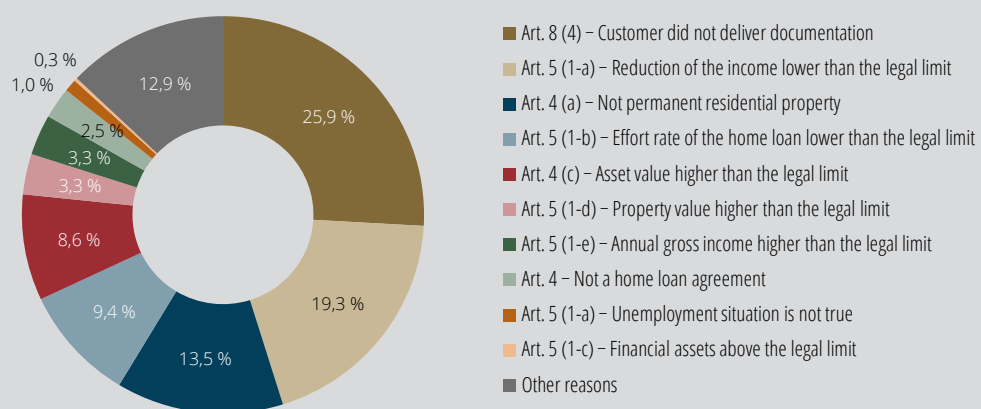
In 2015, credit institutions granted 137 requests for access. Since the start of the regime 631 requests for access have been granted, relating to 607 credit agreements (23 per cent of credit agreements with deferred or denied requests for access).

Of the requests for access granted in 2015, 27 per cent (37) relate to credit agreements not covered by the scope of the extraordinary regime, as they do not have the purpose of purchasing, constructing or improving permanent residential property, compared to 28.6 per cent in 2014. The credit agreements whose requests for access to the extraordinary regime were granted in 2015 had an outstanding amount of around EUR 7.3 million and an amount of overdue credit of around EUR 1 million, which corresponds to a default ratio of 11.9 per cent.

Table III.2.1.2 • Extraordinary regime | Requests for access granted | 2013-2015

Period	Requests granted	Amount outstanding (EUR) (A)	Amount in default (EUR) (B)	Default ratio (C) = (B/[A+B])
2013 ^(a)	361	16 747 999	2 087 056	11,1 %
2014	133	7 012 115	698 842	9,1 %
2015	137	7 315 524	987 786	11,9 %
Total 2013-2015	631	–	–	–
Total credit agreements	607	29 697 863	3 655 848	11,0 %

Note: (a) Includes the period from 10 November to 31 December 2012.



Note: (a) Includes the period from 10 November to 31 December 2012.

Graph III.2.1.1 • Extraordinary regime | Main reason for denying requests for access | 2015^(a)

In 2015, 139 proceedings were concluded under the extraordinary regime, of which 38.8 per cent (54 proceedings) led to the conclusion of an agreement between the credit institution and the bank customer for the settlement of the arrears. In comparison to 2014, there was a reduction of 23.7 percentage points in the

proportion of proceedings concluded with the conclusion of an agreement between the parties to settle the arrears. This was due to the closure of a significant number of proceedings that were pending due to lack of contact by the bank customer after refusal of the restructuring plan presented by the credit institution.

Table III.2.1.3 • Extraordinary regime | Solutions agreed and extinct proceedings | 2013-2015

	2013	2014	2015
Proceedings concluded with agreement	161	97	54
Renegotiated credit agreements	145	90	48
<i>Also with additional loan</i>	49	27	6
Additional loans (only)	2	2	2
Payment in lieu	14	4	4
Disposal of the property to the FIAH	0	1	0
Proceedings concluded without agreement	110	58	85
Customer refuses application of "interim measures"	75	34	34
Non-application of interim measures (other charges on the property)	0	3	3
Other motives	35	21	48
Total agreements covered	271	155	139

The application of the extraordinary regime resulted in the renegotiation of 48 credit agreements in 2015, representing a total renegotiated amount of about EUR 2.8 million. For six of these renegotiations, credit institutions and bank customers agreed, in addition, to conclude an additional loan to pay the instalments.

The introduction of a grace period for principal was a solution included in 77.1 per cent of the agreed renegotiations, sometimes combined with other solutions, namely the extension of the contract term.

In four extraordinary regime proceedings, the mortgaged property was transferred in lieu of payment, which resulted in the complete extinction of the debt in two of these cases.

2.2. Activity developed by the Evaluation Committee of the Extraordinary Regime

The evaluation of the impact of the implementation of the extraordinary regime for the protection of home loan debtors in very difficult economic circumstances is the responsibility of an evaluation committee ("Evaluation Committee") consisting of a chairman (appointed by the Minister of Finance), by the Director-General of the Directorate-General for Consumer Affairs (appointed by the Minister for Economic Affairs), by representatives of Banco de Portugal (Secretary), CMVM and DECO, representing consumers (by indication of the Directorate-General of Consumers, after hearing the relevant associations)⁵.

In exercising its powers, since the entry into force of the extraordinary regime on 10 November 2012, the Evaluation Committee submitted to Parliament and to the Government four evaluation reports on 25 November 2013, 27 February 2014 and 7 April and 15 September 2015.

It is recalled that, following the assessment of the first two reports produced by the Evaluation Committee, Parliament decided to make changes to the extraordinary regime⁶ in order to make the conditions of access to the regime more flexible for bank customers. The legislator also laid down in the law a set of good practices approved by the Evaluation Committee in its first report with a view to improving the implementation of the extraordinary regime⁷.

On 15 September the Evaluation Committee submitted its final report evaluating the impact of the implementation of the extraordinary regime to Parliament and to the Government. The report, which according to law had to be produced by 15 October⁸, aimed to assist the legislator in assessing the need to extend the validity period of the extraordinary regime, set by the legislator by 31 December 2015.

The final evaluation report produced by the Evaluation Committee was based on the analysis of data reported to Banco de Portugal by credit institutions on credit contracts with requests for access to the extraordinary regime and took into account the existence and impact of the Implementation of the other mechanisms provided for by law to promote out-of-court settlements of arrears in home loan agreements, in particular the OASP.

As its validity period was not extended, as legally established, the extraordinary regime expired on 1 January 2016. Nevertheless, the regime continued to apply to requests for access submitted by bank customers until 31 December 2015.

3. Activity of the Assistance Network for Over-indebted Consumers

The Assistance Network for Over-indebted Consumers (RACE) consists of a group of entities recognized by the Directorate-General for Consumer Affairs, following the opinion of Banco de Portugal, which provide information,

support and advice free of charge to bank customers at risk of default or delays in complying with credit agreements, in particular in the context of the procedures created by the general and extraordinary arrears regime.

Box 14 | Assistance Network for Over-indebted Consumers

(Text prepared by the Directorate-General for Consumer Affairs)

The Assistance Network for Over-indebted Consumers was created by the general arrears regime with the aim of ensuring that bank customers at risk of default or delay in fulfilling their obligations under credit agreements are granted free access to information, support and advice, in particular in the course of negotiations with credit institutions.

In their work, the entities of the Assistance Network for Over-indebted Consumers must respect principles of independence, impartiality, legality and transparency. The provision of support to bank customers must also be swift and comply with criteria of high technical rigor, and the confidentiality of the information provided must be ensured at all times.

These entities may not act in representation or on behalf of bank customers and are also prevented from adopting conciliation, mediation or arbitration mechanisms. It should also be pointed out that their intervention ends if a legal action is filed by the credit institution in relation to the credit agreement for which support is being provided.

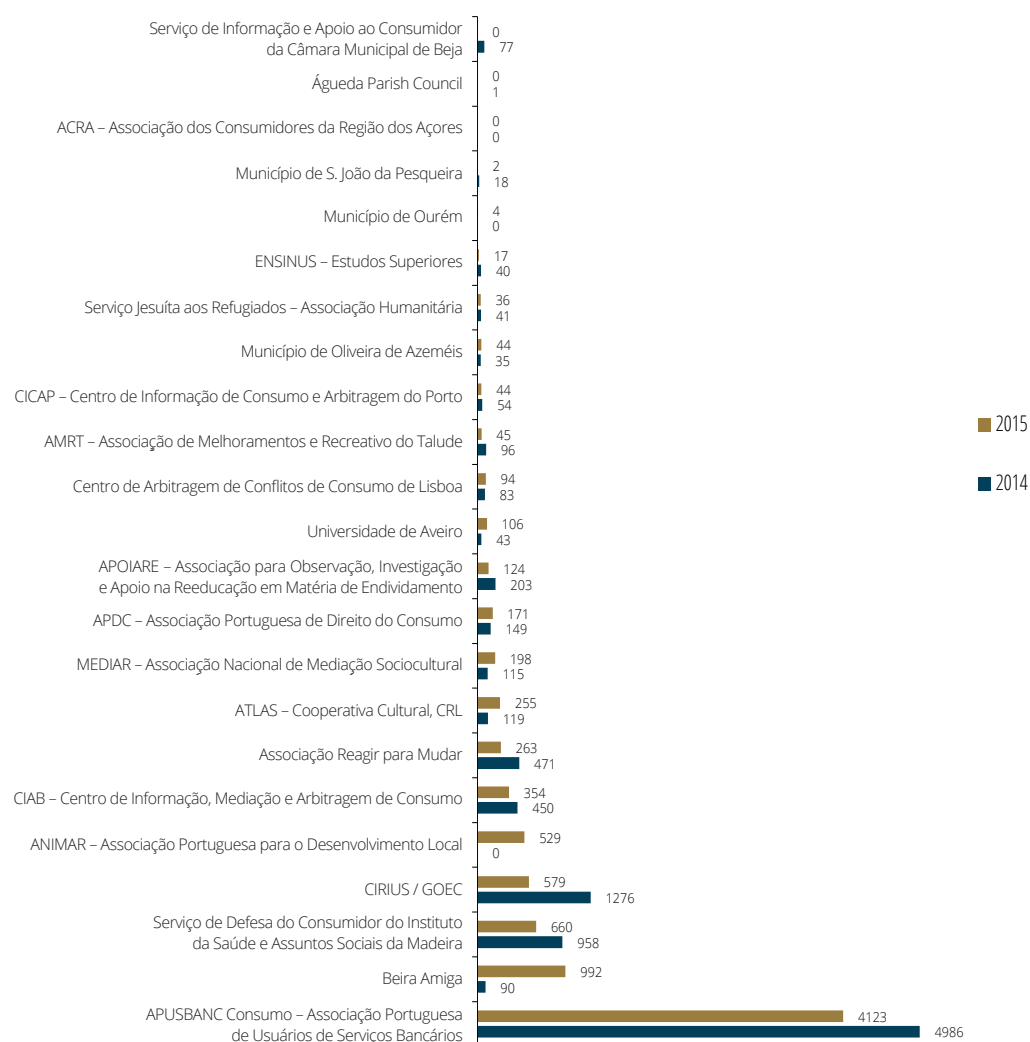
The entities that make up the Assistance Network for Over-indebted Consumers are recognized by the Directorate-General for Consumer Affairs following the opinion of Banco de Portugal and have to demonstrate that they fulfill a set of requirements relating to their technical competence, independence and repute.

In operation since May 2013, the Assistance Network for Indebted Consumers currently comprises the following entities:

- ACRA – Associação dos Consumidores da Região Açores – Autonomous Region of Azores;
- AMRT – Associação de Melhoramentos e Recreativo do Talude – Municipality of Loures;
- ANIMAR – Associação Portuguesa para o Desenvolvimento Local – Lisbon and Tagus Valley Region;
- APDC – Associação Portuguesa de Direito do Consumo – Districts of Coimbra, Castelo Branco, Leiria, Viseu and Guarda;
- APOIARE – Associação para Observação, Investigação e Apoio na Reeducação em Matéria de Endividamento – Lisbon and Oporto;
- APUSBANC Consumo – Associação Portuguesa de Usuários de Serviços Bancários – nation-wide;
- Associação Centro de Arbitragem de Conflitos de Consumo de Lisboa – Lisbon metropolitan area;
- Associação Reagir para Mudar – Lisbon metropolitan area;
- ATLAS – Cooperativa Cultural, CRL – Oporto metropolitan area;
- Beira Amiga – Associação de Defesa do Consumidor, de Apoio a Famílias, de Mediação e de Arbitragem – Municipality of Viseu;
- CIAB – Centro de Informação, Mediação e Arbitragem de Consumo – Minho and part of Trás os Montes and Alto Douro;
- CICAP – Centro de Informação de Consumo e Arbitragem do Porto – Oporto metropolitan area;
- CIRIUS / GOEC – Centro de Investigações Regionais e Urbanas – nation-wide;
- ENSINUS – Estudos Superiores – nation-wide;
- Águeda Parish Council – Municipality of Águeda;
- MEDIAR – Associação Nacional de Mediação Sociocultural – Lisbon metropolitan area;
- Município de Oliveira de Azeméis – Municipality of Oliveira de Azeméis;
- Município de Ourém – Municipality of Ourém;
- Município de S. João da Pesqueira – Douro region, northern part of the country;

- Serviço de Defesa do Consumidor do Instituto da Saúde e Assuntos Sociais da Madeira – IPRAM – Autonomous Region of Madeira;
- Serviço de Informação e Apoio ao Consumidor da Câmara Municipal de Beja – Municipality of Beja;
- Serviço Jesuíta aos Refugiados – Associação Humanitária – Lisbon metropolitan area;
- Universidade de Aveiro – Aveiro and neighboring areas.

It is the responsibility of the Directorate-General for Consumer Affairs to monitor and evaluate the activity carried out by the entities that make up the Assistance Network for Over-indebted Consumers. To this end, on a quarterly basis these entities submit to the Directorate-General for Consumer Affairs a set of statistical information on the processing of requests for information, support and follow-up of bank customers as well as on the implementation of financial training actions.



Source: Directorate-General for Consumer Affairs.

In 2015, the entities of the Assistance Network for Over-indebted Consumers responded to a total of 8640 proceedings, including requests for information and follow-up proceedings for bank customers. This number of proceedings

represents a slight decrease compared to 2014, the year in which the entities of the Assistance Network for Indebted Consumers responded to about 9300 requests for information and monitoring.



Source: Directorate-General for Consumer Affairs.

Notes

1. Decree-Law no. 227/2012 of 25 October, which entered into force on 1 January 2013.
2. Law no. 58/2012 of 9 November, which entered into force on 10 November 2012 and was amended by Law no. 58/2014 of August 25, in force since 24 September 2014.
3. The quantitative information presented in this section was reported by credit institutions to Banco de Portugal under Instruction no. 44/2012.
4. Mortgage agreements, home loan agreements, related credits and other mortgage-backed credits or other property rights are considered.
5. Article 39, paragraph 1 of Law no. 58/2012 of 9 November, as amended by Law no. 58/2014 of August 25.
6. Law no. 58/2014 of 25 August, which entered into force on 24 September 2014.
7. Good practices were subsequently transmitted to the market by Banco de Portugal through Circular Letter no. 98/2013/DSC.
8. Article 39, paragraph 9 of Law no. 58/2012 of 9 November, as amended by Law no. 58/2014 of 25 August.





IV

Financial information and literacy actions

1. Financial information through the Bank Customer Website
2. Financial literacy activities
3. Participation in international forums

The financial information and literacy of bank customers is a pillar of Banco de Portugal's banking conduct supervision as a complement to the regulation and supervision of the sale of products and services in the retail banking markets. Bank customers with higher levels of knowledge about financial issues and more appropriate financial attitudes and behaviour contribute to increase the effectiveness of regulatory instruments and promote the stability of the financial system.

To promote the financial information of bank customers, Banco de Portugal uses the Bank Customer Website as its preferred channel. The Bank Customer Website is also used to promote the financial literacy of bank customers. Whenever Banco de Portugal receives inquiries from bank customers about banking products and services, services provided by Banco de Portugal and other matters, customers are referred to the contents available on the Website.

Banco de Portugal's financial literacy initiatives are developed through its Regional Network (Branch and Agencies) present on the mainland and on the Islands.

In its financial literacy activities, Banco de Portugal also participates in the promotion of the National Plan for Financial Education (PNFF) with the other financial supervisors (Securities Market Commission and Insurance Supervisory Authority and Pension Funds), in partnership with a wide and diverse group of entities.

In the international arena, the participation of Banco de Portugal in the OECD/INFE's projects and the partnerships with other Portuguese-speaking central banks to share initiatives and materials on financial education are worthy of note.

1. Financial information through the Bank Customer Website

1.1. New content

In 2015, new content was introduced in the Bank Customer Website, in particular the provision of new services to the public, information on new means of payment and the updating of the pages on customer rights and duties, reflecting the evolution of the applicable legal and regulatory framework.

Banco de Portugal now provides access to the Accounts Database through the Bank Customer Website (and also through its institutional website). The Accounts Database contains information on accounts that bank customers have in their name and on the persons authorised to operate these accounts (individuals or corporations).

The Bank Customer Website also discloses the amount of the maintenance fee and the minimum amount to open a basic account in the respective institutions as well as the products and services included and access to its

Standardised Information Sheet (FIN). The dissemination of this information makes it possible to compare institutions through easy access to the conditions practiced.

With the increasing acceptance of contactless payments, Banco de Portugal provides information on the use of cards using this technology on the Bank Customer Website with the aim of informing customers of their characteristics, conditions and safety limits. In parallel, Banco de Portugal sent payment service providers a set of good practices¹ regarding the information to be provided under the use of payment cards with this technology.

Following the entry into force in early October of the changes to the Basic Bank Accounts regime, Banco de Portugal published information on the new rights of customers, informing them of the easier access. This was the result of the introduction of measures whereby all credit institutions are now obliged to make

this information available. The list of institutions that make them available as well as the amount of the maintenance fee of the Basic Bank Account per institution and respective

Standardised Information Sheet are now also provided to the new universe of institutions that provide Basic Bank Accounts.



<http://cliente.bancario.bportugal.pt/pt-PT/ContasdeDeposito/ContaBase/Paginas/default.aspx>



<http://cliente.bancario.bportugal.pt/pt-PT/instrumentosdepagamento/Cartoes/Paginas/CartoesContactless.aspx>



<http://cliente.bancario.bportugal.pt/pt-PT/ContasdeDeposito/SMB/Paginas/SMB.aspx>

Box 15 | Visits to the Bank Customer Website

In 2015, there were almost 3 million visits to the Bank Customer Website, which corresponds to an average of more than 8 thousand accesses per day.

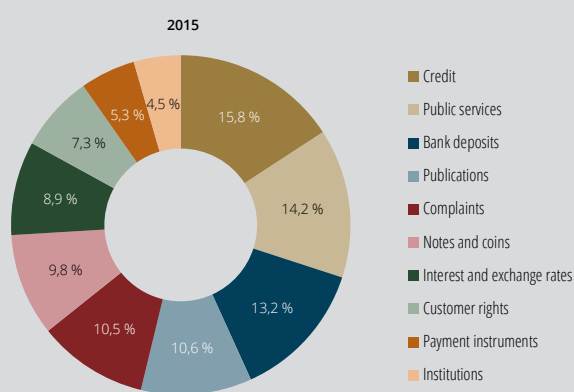
The most-visited pages were those related to credit, particularly the pages relating to mortgage credit, consumer credit and over-indebtedness.

With regard to the bank deposits page, the informational content on the different types of deposits and the Basic Bank Accounts were more in demand. The higher volume of visits to the latter page was influenced by the legislative amendment to the Basic Bank Accounts regime² in October 2015.

Also worthy of note are the visits to the pages where bank customers can access and obtain information on credit responsibilities (CRC) and the Accounts Database, both of which are part of the public services made available by Banco de Portugal.

The webpage that provides information on how to file complaints against credit institutions also had a significant number of visits.

Graph C.15.1 • Bank Customer Website | Number of visits to the main contents by topic | 2015



1.2. Response to requests for information from bank customers

During 2015, Banco de Portugal received a total of 2673 requests for information, slightly more than those received in 2014. Most requests for information were sent through the specific form contained in the Bank Customer Website (93 per cent).

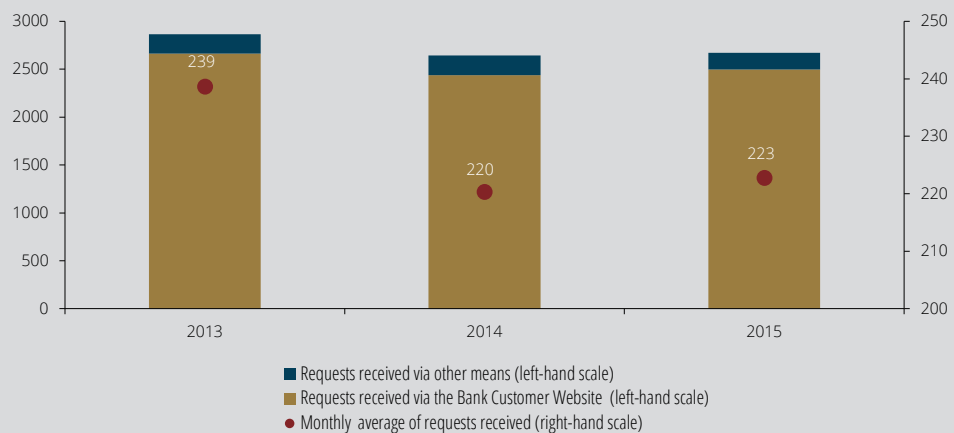
Most requests relate to banking products and services (55 per cent). Compared to 2014, there was an increase in requests for information on this topic (15.6 per cent) as a result of the greater number of queries on deposit accounts, payment instruments and mortgage credit. Conversely, there was a reduction in

the number of applications for consumer credit and credit to companies. The drop in the number of requests for information on arrears regimes is also worth noting.

In addition, 612 requests were received for information on Banco de Portugal's services, 8.5 per cent less than in 2014. This reduction is mostly explained by the decrease in the number of requests for information on credit responsibilities and notes and coins.

This year, there was also a decrease in requests for information on other matters, including matters outside the competence of Banco de Portugal.

Graph IV.1.2.1 •
Requests for
Information |
Developments |
2013-2015



Graph IV.1.2.2 •
Requests for
Information |
Distribution
by topic
| 2013-2015

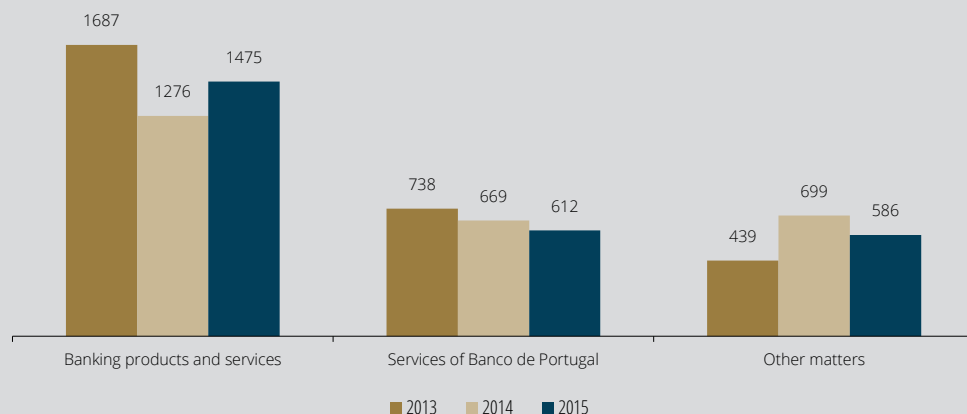


Table IV.1.2.1 • Requests for information | By type of banking product and service
| 2014-2015

	Number of requests			Percentage distribution		
	2014	2015	Change (%)	2014	2015	Change (p.p.)
Deposit accounts	510	658	29,0 %	40,0 %	44,6 %	4,6
Mortgage credit	279	293	5,0 %	21,9 %	19,9 %	-2,0
of which: Arrears regimes	50	29	-42,0 %	3,9 %	2,0 %	-2,0
Consumer credit	226	201	-11,1 %	17,7 %	13,6 %	-4,1
of which: Arrears regimes	52	32	-38,5 %	4,1 %	2,2 %	-1,9
Credit to companies	41	39	-4,9 %	3,2 %	2,6 %	-0,6
Payment instruments	220	284	29,1 %	17,2 %	19,3 %	2,0
Total	1276	1475	15,6 %	100,0 %	100,0 %	-

Box 16 | Most frequent topics in the requests for information on banking products and services

Deposit accounts

The most frequent requests for information on deposit accounts have to do with the information requested by the institutions from bank customers on current account transactions in order to comply with duties on the prevention of money laundering and the financing of terrorism³. Requests related to the provision to customers of bank statements from previous years are also high in demand.

Requests were also received for information on the possibility of credit institutions charging fees associated with the deposit account as well as the conditions for their applicability. There are also requests for information on conditions for the operation of deposit accounts, including accounts on behalf of deceased holders and on the procedures required for access to these accounts.

Doubts were also received regarding the rules for opening deposit accounts, both abroad and in Portugal, as well as the procedures applicable to the closure of accounts. The information contained in the Accounts Database was also subject to information requests.

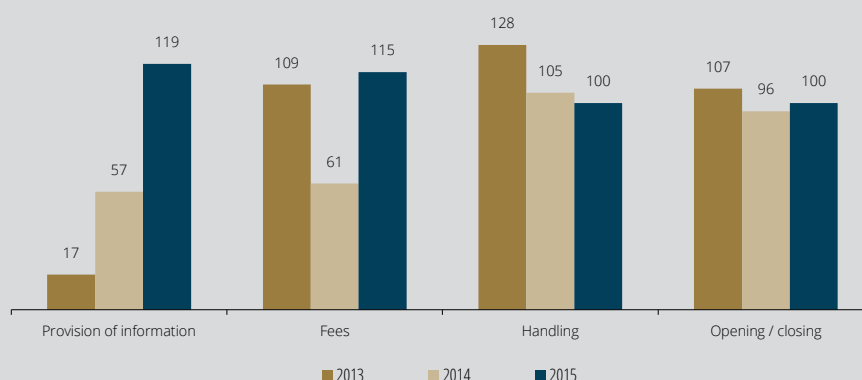
Mortgage credit

The most frequent requests for information relate to the subsidised credit regime for house purchase for people with disabilities, whose number of applications quadrupled compared to 2014 as a result of the entry into force on 1 January 2015 of the new regime⁴. The main issues raised by the clients are related to the conditions of access, permanence and change to this regime.

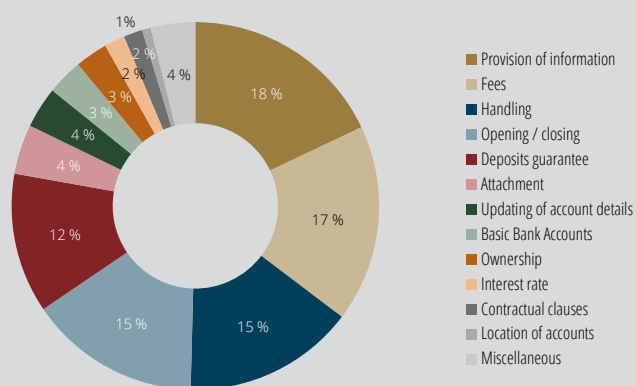
Requests were also received for information on the financial impact of changes to agreements resulting from changes in ownership as a result of divorce, judicial separation of persons and property or death.

Questions on the calculation of the interest rate in the contracts as a result of the evolution of the indexer to negative values were also subject to requests for information.

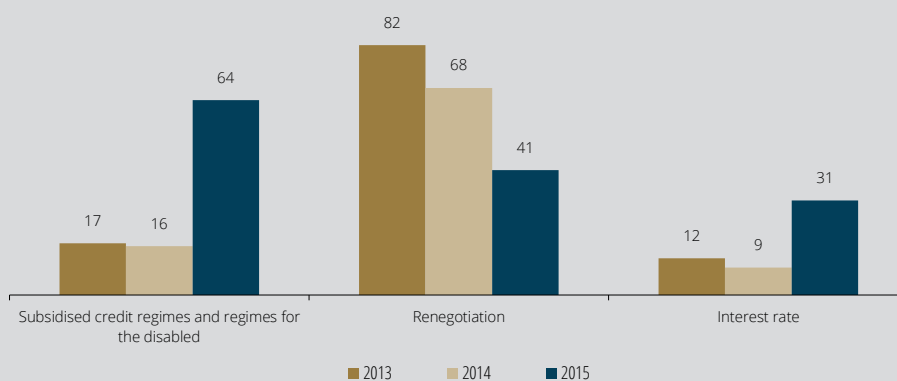
Graph C.16.1 • Requests for information | Main topics of deposit accounts | 2013-2015



Graph C.16.2 • Requests for information | Distribution by topics relative to deposit accounts | 2015



Graph C.16.3 • Requests for information | Main topics of mortgage credit | 2013-2015

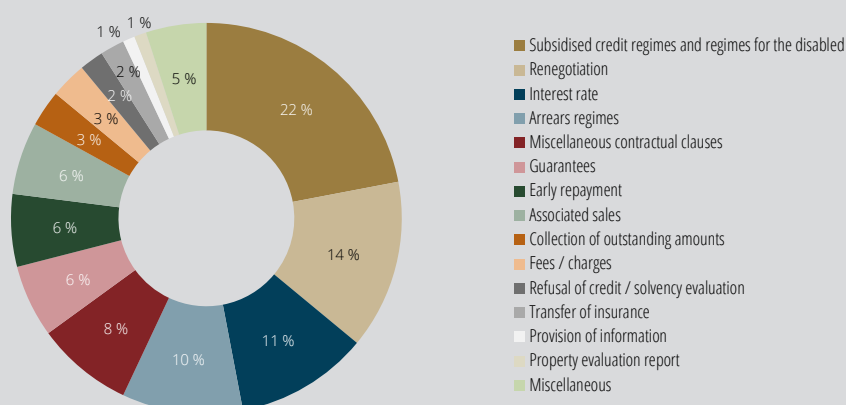


Consumer credit

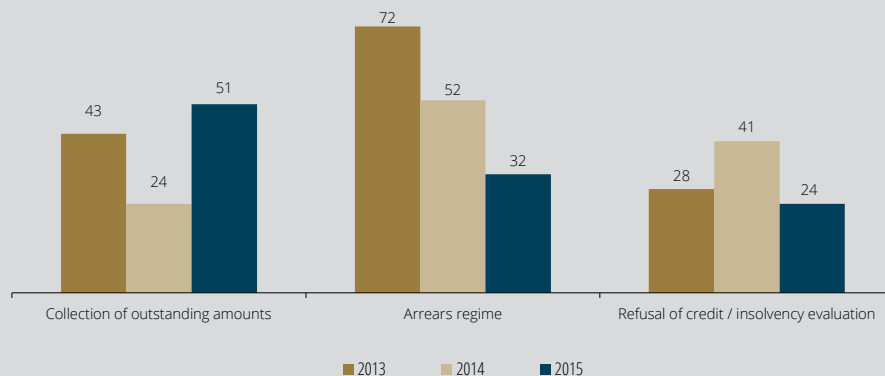
The most frequent questions concern the collection of amounts owed in cases of default. Queries on the granting and refusal of credit

and the assessment of the bank customer's solvency were also high. The analysis of requests for information on the default of credit agreements can be found in the following Box.

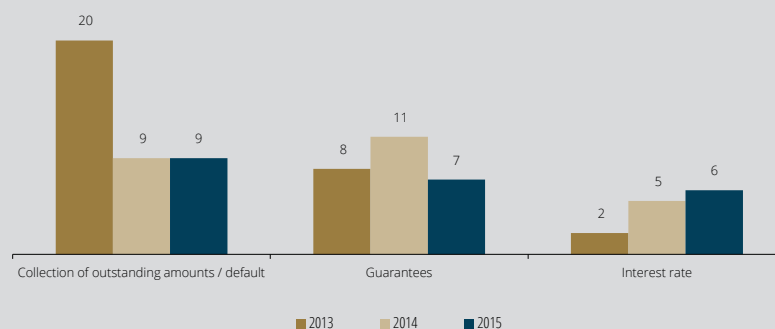
Graph C.16.4 • Requests for information | Distribution by topics relative to mortgage credit | 2015



Graph C.16.5 • Requests for information | Main topics of consumer credit | 2013-2015



Graph C.16.6 • Requests for information | Distribution by topics relative to consumer credit | 2015



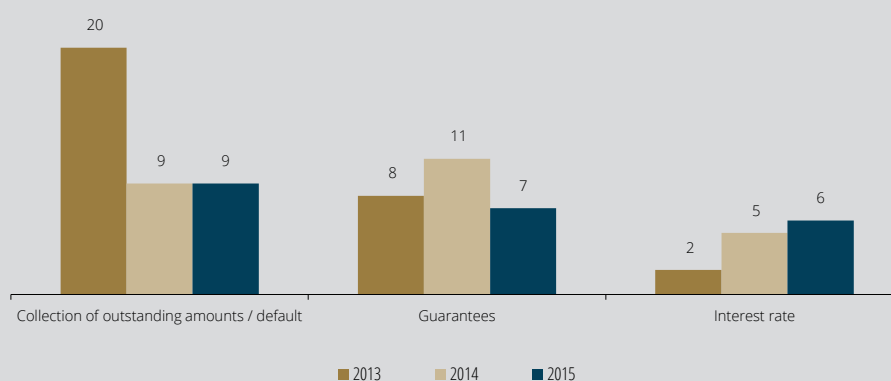
Credit to companies

The main issues are related to the procedures used by credit institutions and entities contracted by them to collect amounts owed, as well as the possibility of renegotiating the credit agreement in case of default or arrears. Other issues were the provision of guarantees at the request of the credit institution, the activation of these guarantees, their extinction and the collection of fees and charges. Bank customers also questioned the conditions established for calculating the interest rate on credit agreements as a result of the evolution of the index to negative values.

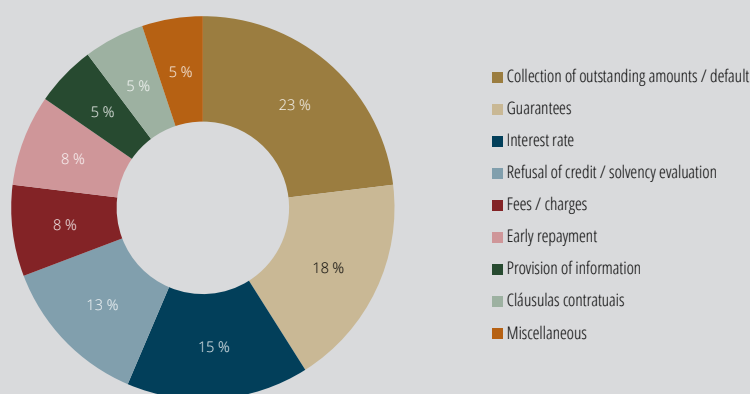
Payment instruments

Credit transfers continued to raise doubts regarding the timing for the amounts transferred to become available, applicable charges and the revocation of transfer orders. Bank customers also raised questions about the information that should accompany the transfer orders and on the SEPA (Single Euro Payments Area) payment model for transfers.

Graph C.16.7 • Requests for information | Main topics of credit to companies | 2013-2015



Graph C.16.8 • Requests for information | Distribution by topics relative to credit to companies | 2015

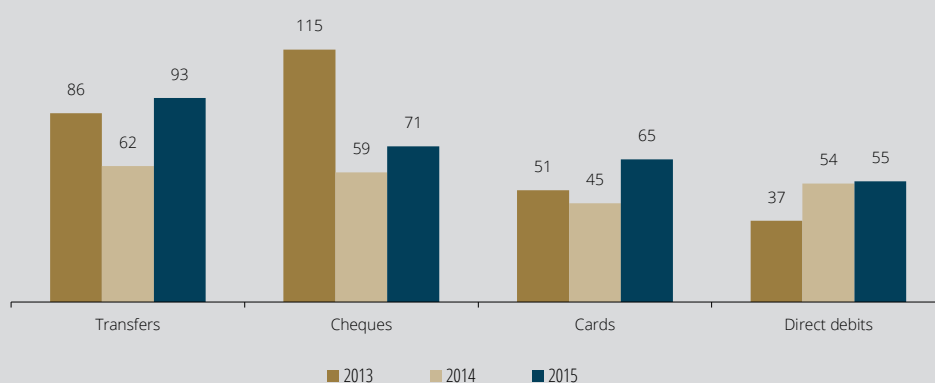


With regard to cheques, the questions posed by bank customers focused in particular on unpaid cheques and the procedures to be followed by customers to settle these cheques, the timeframes for the availability of cheques and the collection of fees.

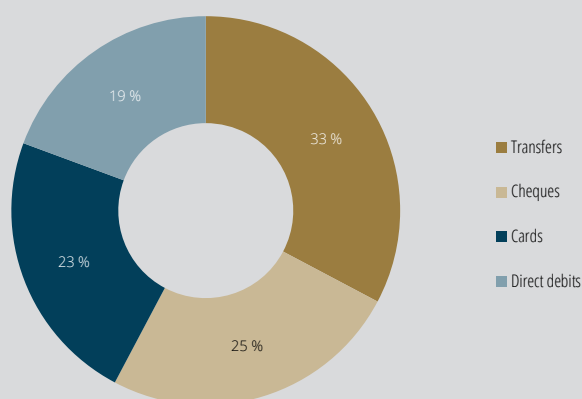
In the context of the cards, the most frequent issues were those relating to the rights and duties of customers in case of fraud, blocking and / or capture of cards and issuing or replacing cards.

In relation to direct debits, of particular importance were bank customers' doubts regarding the amounts that may be charged under a direct debit authorisation in force, the possibility of repayment of amounts previously debited and the cancellation of direct debit authorisations.

Graph C.16.9 • Requests for information | Main topics of payment instruments | 2013-2015



Graph C.16.10 • Requests for information | Distribution by topics relative to payment instruments | 2015



Box 17 | Requests for information on the arrears regimes

In 2015, 61 requests for information regarding arrears regimes were received, two of which relating to the extraordinary regime. In comparison to 2014, there was a reduction of 35 per cent in the number of requests for information on the general regime and 82 per cent on the extraordinary regime.

Of the requests for information on the general arrears regime received in 2015, 71 per cent focused on the OASP, 22 per cent on the Action Plan for the Risk of Non-compliance and 7 per cent on both the OASP and the Action Plan for the Risk of Non-compliance.

Under the Action Plan for the Risk of Non-compliance, the requests for information focused on:

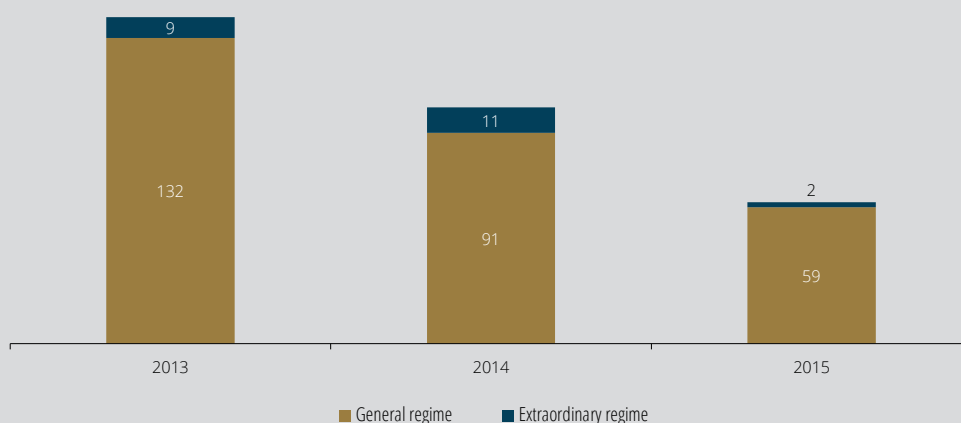
- The mechanisms provided by law to promote the prevention of non-compliance. Some of these requests were submitted following the receipt of letters from credit institutions reporting the inclusion of bank customers in the Action Plan for the Risk of Non-compliance, reflecting proactive action by the institutions concerned after detecting evidence of deterioration of customers' financial capacity;

- Solutions that can be proposed to customers to prevent non-compliance, with some clients questioning the admissibility of solutions presented to them by credit institutions.

Within the OASP, requests for information focused on:

- Existing mechanisms to promote the renegotiation of credit agreements in arrears;
- Failure to submit proposals to settle the arrears or the content of the solutions proposed by credit institutions during the negotiation process;
- The refusal by credit institutions of the proposals submitted by customers for the renegotiation of credit agreements or, in other cases, payment in lieu of real estate;
- The procedures adopted by credit institutions in the management of default situations, namely on the use of credit management services;

Graph C.17.1 • Requests for information | Main topics of arrears regimes | 2013-2015



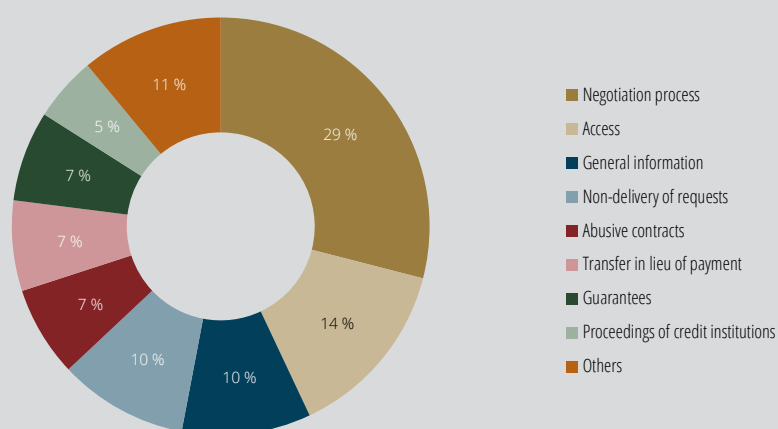
- The contacts made for the collection of credits in default that customers consider abusive, either because of their aggressive or intimidating content or because the contact data used had not been provided by customers;
- The rights of the guarantors of credit contracts in arrears.

With regard to the extraordinary regime, the two requests for information received focused on the access requirements provided for by law and also on the requirements and effects of the transfer in lieu of payment of the property that guarantees the mortgage loan.

Table C.17.1 • Requests for information | Arrears regimes, by subject | 2015

Subject questioned		Number of requests	Percentage distribution
Mortgage credit		29	47,5 %
General regime	Action Plan for the Risk of OASP	7	11,5 %
	OASP	17	27,9 %
	Action Plan for the Risk of Non-compliance/OASP	3	4,9 %
Extraordinary regime		2	3,3 %
Consumer credit		32	52,5 %
General regime	Action Plan for the Risk of OASP	6	9,8 %
	OASP	25	41,0 %
	Action Plan for the Risk of Non-compliance/OASP	1	1,6 %
Total		61	100,0 %

Graph C.17.2 • Requests for information | Distribution of arrears regimes by topic | 2015



2. Financial literacy activities

2.1. Banco de Portugal's sectoral activity of financial literacy

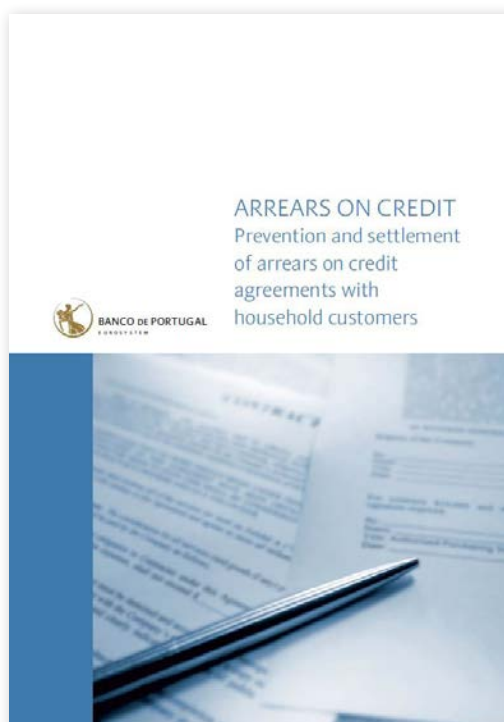
Throughout 2015, Banco de Portugal carried out a wide range of financial literacy actions on the importance of savings, the preparation of a family budget, the care to be taken when asking for loans, accounts and payment means and prevention of fraud. These training actions were conducted in several parts of the country with the support of Banco de Portugal's regional network. Most of them targeted younger audiences with the aim of promoting appropriate financial attitudes and behaviours to be adopted throughout life.

Banco de Portugal also developed financial information and literacy initiatives aimed at bank customers, giving priority to the dissemination of systems for the prevention and management of non-compliance and Basic Bank Account Regime.

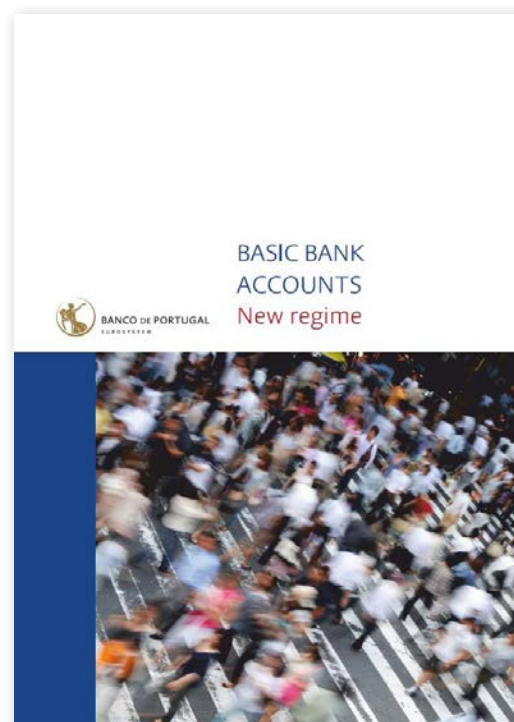
As part of the dissemination of arrears prevention and management regimes, Banco de

Portugal collaborated with the Directorate-General for Consumer Affairs and with the Assistance Network for Over-indebted Consumers (RACE) entities. Banco de Portugal also carried out actions to disclose the rights and duties of bank customers in default. In May 2015, it participated in the colloquium on over-indebtedness, organised by the Viseu City Council and by the Beira Amiga Association (an entity that forms part of the RACE) and, in October, in the annual meeting of the Municipal Consumer Information Centres, promoted by the Directorate-General for Consumer Affairs.

In order to promote financial inclusion, Banco de Portugal has been disclosing the Basic Bank Account regime. These initiatives involve not only face-to-face training actions but also publicity campaigns through leaflets and posters posted at the Social Security and High Commission for Migration offices throughout the country.



Brochure on non-compliance of credit agreements.



Brochure on the Minimum Banking Services.

Box 18 | Financial literacy actions through Banco de Portugal's Regional Network

Throughout 2015, the Banco de Portugal's Regional Network carried out a total of 214 financial literacy actions, emphasizing the largest number of initiatives in the last three months of the year, boosted by Financial Training Day on 30 October.

Financial information and literacy must reach out to geographically dispersed audiences. To this end, it is essential to be close to local entities – associations, libraries, parish councils, schools, etc. – thereby reaching very diverse audiences with messages targeted at them. The role of Banco de Portugal's Regional Network is crucial for the development of local training and awareness-raising actions and for the dissemination of informational materials at the respective customer service centers.

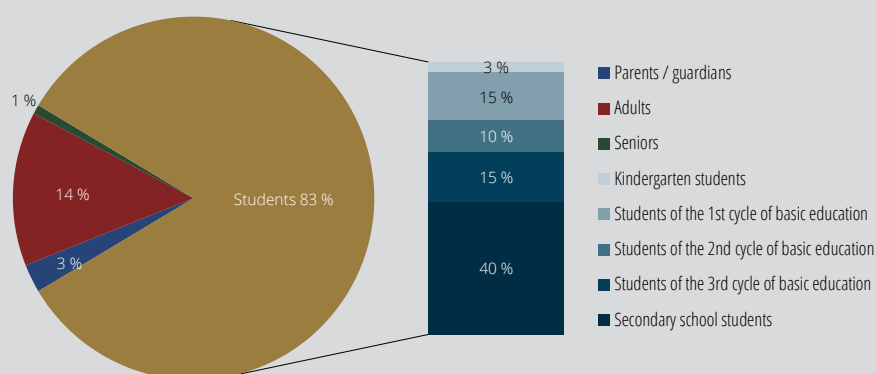
The 214 financial literacy actions carried out in 2015 by the Regional Network involved 8528 participants.

The actions developed for the school public represented more than 80 percent of the total and involved all education cycles, from kindergarten to secondary education. Particularly noteworthy are the actions directed at the last education cycle, which represent about 40 percent of all training actions. The main topics addressed in these actions were savings and the management of the budget.

The actions directed at adults involved employees of parish councils, the National Republican Guard, the Public Security Police and Community Centres. These financial literacy actions addressed a wide range of topics, such as budget management, minimum banking services and the prevention and management of non-compliance.

Banco de Portugal's Regional Network is made up of a branch office in Oporto, six branches on the mainland (Braga, Viseu, Coimbra, Castelo Branco, Évora and Faro) and two regional branches in the Azores and Madeira.

Graph C.18.1 • Regional Network | Distribution of the number of participants by target audience | 2015





Initiative developed with Banco de Portugal's Branch in Viseu.



Initiative developed with Banco de Portugal's Branch in Azores.



Initiative developed with Banco de Portugal's Branch in Madeira.



Initiative developed with Banco de Portugal's Branch in Coimbra.



Initiative developed with Banco de Portugal's Branch in Oporto.



Initiative developed with Banco de Portugal's Branch in Évora.

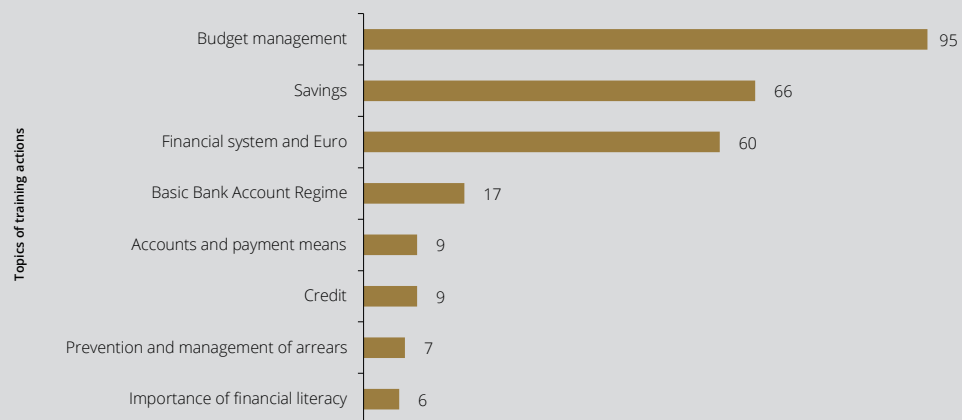


Initiative developed with Banco de Portugal's Branch in Faro.



Initiative developed with Banco de Portugal's Branch in Braga.

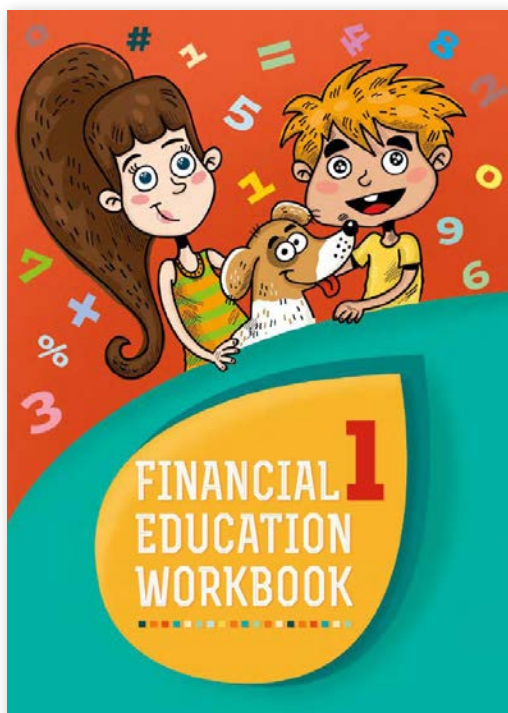
Graph C.18.2 • Regional Network | Topics of the training actions | 2015



Note: In some training actions more than one topic was addressed.

2.2. Participation in the National Plan for Financial Education

In 2015, the activities of the National Plan for Financial Education continued the strategy of introducing financial education in schools via two more teacher training actions (in Lisbon and Évora), which followed the previous ones in Oporto and Coimbra. These actions, developed in collaboration with the Directorate-General for Education, aim to contribute to an effective implementation of the Core Competencies for Financial Education in Kindergarten, Basic Education, Secondary Education and Adult Learning and Training, prepared by the financial supervisors in conjunction with the Ministry of Education and adopted by this Ministry in 2013. The four training actions already carried out were strongly supported by educators and teachers, with 830 applications having been received. In total, these training actions included 160 educators and teachers.



Financial Education Workbook 1.



Teacher training workshop in Lisboa.



Teacher training workshop in Évora.

Also in the scope of the introduction of financial literacy in schools, the first Financial Education Manual was launched, aimed at students in the 1st cycle of basic education, publicly presented in October on Financial Training Day. This document resulted from the cooperation protocol signed in 2014 between the National Council of Financial Supervisors, the Ministry of Education and four associations from the financial sector (APB – Portuguese Banking Association, APS – Portuguese Association of Insurers, APFIPP – Portuguese Association of Investment Funds, Pension Funds and Asset Management and ASFAC – Association of Specialised Credit Institutions) for the preparation of educational and pedagogical materials to support teachers and students in approaching the topics set forth in the Core Competencies for Financial Education.

Financial literacy in schools was also promoted through yet another *Todos Contam* Competition. This initiative is sponsored annually by the National Council of Financial Supervisors, in collaboration with the Ministry of Education, and aims to reward the best financial training projects to be implemented in schools in each school year. The 4th Competition, launched in June 2015, received great support from schools throughout the country (including the Azores and Madeira) and involved around 90 schools and more than 20 100 students, out of a total of 59 applications from all levels of education. The jury of the *Todos Contam* Competition awarded the five prizes provided in the regulation as well as a Special Prize. Given the high quality of the projects submitted to the competition, the jury also decided to award four honourable mentions.

In 2015, the Plan started financial training with companies, recognising the importance of promoting financial training for entrepreneurs as well as businessmen and managers of micro, small and medium-sized enterprises in Portugal. This initiative was based on the signing in March 2015 of the collaboration protocol between the National Council of Financial Supervisors and the Ministry of



Poster of the 4th Todos Contam Competition.

Economy, through the IAPMEI – Agência para a Competitividade e Inovação, I.P. (Public Agency for Competitiveness and Innovation) (which was joined in 2016 by the Instituto do Turismo de Portugal, the Portuguese central public authority for tourism).



Signing of the Protocol between the National Council of Financial Supervisors and IAPMEI.

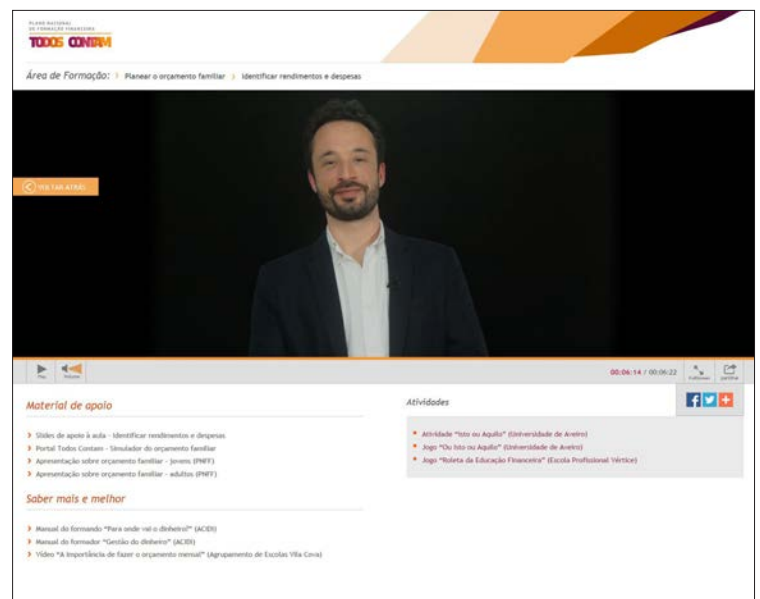
As a result of the signing of this protocol, the 'Core Competencies for Financial Training of micro, small and medium-sized companies' was drawn up. Presented publicly on Financial Training Day in October, the 'Core Competencies for Financial Training' was submitted to a public consultation process throughout November. During this process, meetings were held in various parts of the country with business associations and other partners of the Plan.

Also in 2015, the Plan launched the Todos Contam e-learning platform, advertising it through digital media. This platform was developed to support adult education, including the training of trainers. The platform aims to meet the different training needs identified in terms of content and target audiences, allowing greater geographic coverage by having free access. The platform presents a set of lessons and materials on household budget, savings and investment, credit and insurance.

The importance of financial competencies in the success of entrepreneurs in the social economy led the National Council of Financial Supervisors to sign a collaboration protocol with Cooperativa António Sérgio para a Economia Social (CASES) in February 2015. Under this protocol, the Plan participated in the 2nd edition of the 'Academia ES' program, held in Almada. Academia ES is a program aimed at training and raising the awareness of young people on topics of social economy designed to promote the development of social and collective entrepreneurship projects. The Plan teamed up with the António Sérgio Prize promoted by CASES, offering a financial education module to the winners of the 'Innovation and sustainability' and 'School work' categories for the second consecutive year. The António Sérgio Prize aims to honour the most distinguished natural and legal persons in the implementation of innovative and sustainable projects, in the production of research work, in the postgraduate educational offer and in the performance of school work in fields relevant to the social economy.



Core Competencies for Financial Training of Micro, Small and Medium-sized Enterprises.



Lesson on the Todos Contam e-learning platform, at <http://elearning.todoscontam.pt/>

In 2015, the Plan continued its regular awareness-raising initiatives on the importance of financial education. On 30 October, Financial Training Day 2015 was held in Faro (Municipal Theatre), the centre of the activities. The day

was dedicated to 'Financial education to support micro and small enterprises', recognising the importance of financial skills for entrepreneurs and managers.

At the conference held at the Municipal Theatre in Faro, the Plan's new projects and the winning

projects of the 4th Todos Contam competition were announced and thematic workshops were held. On this day, several initiatives were also promoted by the financial supervisors, the partners of the Plan and the Todos Contam network of schools



Signing of the Protocol between the National Council of Financial Supervisors and CASES.



Financial Training Day, 30 October 2015: Opening session by the National Council of Financial Supervisors. From left to right, the Governor of Banco de Portugal and President of the CNSF, Carlos da Silva Costa; the Chairman of Comissão do Mercado de Valores Mobiliários (CMVM), Carlos Tavares; the Administrator of Banco de Portugal, Dr. António Varela; the Chairman of Autoridade de Supervisão de Seguros e Fundos de Pensões (ASF), José Figueiredo Almagá; and the Mayor of the Faro Town Council, Rogério Bacalhau.



Activities held in schools throughout the country, during Global Money Week.

The National Plan for Financial Education participated for the third consecutive year in Global Money Week. This initiative of Child and Youth Finance International, which has the support of the OECD and the European Parliament, ran from 9 to 17 March in 122 countries. In Portugal, 40 schools participated in Global Money Week, involving around 2,500 students in financial awareness initiatives. The Plan carried out a wide range of activities, including training sessions on financial topics (budget management, savings, credit cards, insurance and the financial system), particularly in the Agrupamento de Escolas de Tábua (District of Coimbra), attended by about 300 students in the 3rd cycle of basic education and secondary education. The Plan also teamed up with European Money Week.



European Money Week on the *Todos Contam* website.

3. Participation in international forums

Banco de Portugal is a founding member of the OECD's International Network of Financial Education (INFE) and is part of the Advisory Board, which establishes its strategic guidelines.

As from 2015, the OECD/INFE included in its agenda financial training for micro, small and medium-sized enterprises, expanding its work to this new target audience and creating a working group dedicated to this topic. Based on a questionnaire carried out in 2015 on the current situation of financial training for micro and small enterprises, in 2016 the OECD/INFE intends to present a report to support the definition of training strategies and tools targeted at entrepreneurs, managers and business owners of micro and small enterprises. Banco de Portugal participates in this working group, sharing its experience with the work carried out under the National Plan for Financial Education, in conjunction with IAPMEI.

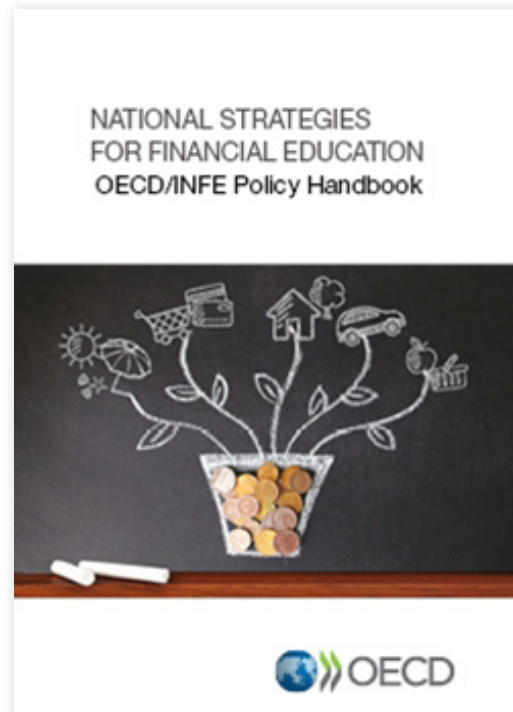
The OECD/INFE has also given attention to the demands that the new digital channels bring to financial training, in particular as regards digital finance. The working group dedicated to this subject, in which Banco de Portugal is actively involved, is preparing a report on the implications of the use of digital channels in financial training and in the protection of financial product consumers.

In 2015, the OECD/INFE published a handbook on the implementation of national strategies: 'National Strategies for Financial Education: OECD/INFE Policy Handbook', which identifies best practices for implementing an integrated financial education policy and describes the experiences of the various countries over the past few years. The Portuguese experience is mentioned among several case studies.

Banco de Portugal also contributed to this work.

The OECD/INFE also published the 'OECD/INFE Core competencies framework on financial literacy for youth', which defines the expected financial attitudes, behaviours and knowledge for young people aged between 15 and 18, in which Banco de Portugal also participated.

Also in 2015, the OECD/INFE promoted the second survey on the financial literacy of the population, defining a set of common issues to be integrated into the questionnaires carried out by the countries that joined this project. Portugal was one of the countries, carrying out a national survey that included these and other issues, namely those that had already been included in Banco de Portugal's 2010 Financial Literacy Core Questionnaire. The survey conducted in Portugal in 2015, prepared under the National Plan for Financial Education, also included specific questions of the ASF and CMVM.



INFE's handbook on the implementation of national strategies.

Box 19 | Cooperation with the BCPLP on financial inclusion and financial literacy

In July 2015, Banco de Portugal hosted the second meeting on financial literacy and financial inclusion under the BCPLP community in Lisbon. The first meeting that took place in July 2013 gave rise to the publication 'Policies for Financial Inclusion and Financial Literacy'⁵.

This meeting discussed the challenges posed by the implementation of national programs and initiatives for inclusion and financial education. The topic of financial education in schools and the necessary articulation between central banks and national ministries of education were also under analysis. The use of means for financial distance learning, such as portals, e-learning tools and mobile applications were also discussed.

These meetings of representatives of the BCPLP allow Portuguese-speaking countries to share their regulation experiences, their policies of financial inclusion and financial literacy, and to discuss the approaches adopted and the results obtained.

The BCPLP community maintains regular contacts under the area of financial inclusion and financial literacy, sharing information via the website <http://www.bcplp.org>.



Second meeting of the BCPLP in Lisbon, in July 2015.

Notes

1. Circular Letter No. 68/2015/DSC, of 9 September.
2. See description of legislative amendment in Chapter II, item 1.
3. Notice no. 5/2013 of Banco de Portugal.
4. Law No. 64/2014, of 26 August.
5. Available for download at <http://clientebancario.bportugal.pt/pt-PT/Publicacoes/InclusaoFormacaoFinanceira/Biblioteca%20de%20Tumbnails/Políticas%20Inclusão%20Formação%20Financeira.pdf>



VI Summaries

1. Legislative and regulatory initiatives
2. Initiatives and events of the international agenda
3. International cooperation initiatives of banking conduct supervision

1. Legislative and regulatory initiatives

Date	Identification of the diploma	Object
16 March	Instruction No. 2/2015	It establishes the maximum rates (APR) to be applied in consumer credit agreements to be concluded during the 2 nd quarter of 2015.
26 March	Law No. 23-A/2015	Among other things, it transposes Directive 2014/49/UE of 16 April on deposit guarantee schemes, amending in particular the General Regime for Credit Institutions and Financial Companies.
30 March	Circular Letter No. 26/2015/DSC	It conveys the understanding of Banco de Portugal regarding the repercussion of a possible evolution to negative Euribor interest rates in credit and financing agreements with clients.
29 April	Regulation (UE) 2015/751	It lays down the technical and commercial requirements for card-based payment transactions, setting in particular the maximum exchange rates where the payer's payment service provider and the payee's payment service provider are located in the European Union.
2 June	Decree-Law No. 100/2015	It approves the legal regime of financial credit companies and changes the legal systems of investment companies, leasing companies, factoring companies and mutual guarantee societies.
15 June	Instruction No. 7/2015	It defines the maximum rates (APR) to be applied in consumer credit agreements to be concluded during the 3 rd quarter of 2015.
6 July 2015	Law No. 66/2015, 6 July	It amends the Basic Bank Account regime, established by Decree-Law No. 27-C/2000 of 10 March, and introduces an obligation for credit institutions to send an invoice with a breakdown of the fees and expenses charged under demand deposit accounts, changing the General Regime of Credit Institutions and Financial Companies, approved by Decree-Law No. 298/92, of 31 December. In addition, it prohibits the collection of fees and expenses associated with the return of cheques, pursuant to Decree-Law No. 454/91, of 28 December, and establishes requirements for the charging of fees by credit institutions.
17 August	Circular Letter No. 55/2015/DSP	It informs that payment service providers subject to the supervision of Banco de Portugal must comply with the EBA Guidelines on the security of payments made via the internet with a view to strengthening the prevention and combating of fraud, as well as public confidence.
24 August	Law No. 102/2015	Legal regime of crowdfunding.
8 September	Lei n.º 144/2015	It transposes Directive 2013/11/UE of the European Parliament and of the Council of 21 May 2013 on the alternative dispute resolution for consumer disputes, establishes the legal framework for out-of-court settlement mechanisms for consumer disputes and repeals Decree-Laws No. 146/99 of 4 May and 60/2011 of 6 May.
15 September	Circular Letter No. 68/2015/DSC	It communicates the information duties to be observed by payment service providers to payment card holders using contactless technology.
15 September	Instruction No. 13/2015	It establishes the maximum rates (APR) to be applied in consumer credit agreements to be concluded during the 4 th quarter of 2015.

Date	Identification of the diploma	Object
28 September	Notice No. 2/2015	It establishes the duties to be observed by credit institutions regarding the disclosure of legally established conditions so that natural persons can access and benefit from the system for access to minimum banking services. It amends Notice No. 15/2012.
15 October	Instruction No. 15/2015	It determines the biannual submission of the information details related to the provision of Basic Bank Account Regime in the reporting map attached to the Instruction.
15 December	Instruction No. 17/2015	It establishes the maximum rates (APR) to be applied in consumer credit agreements to be concluded during the 1 st quarter of 2016.

2. Initiatives and events of the international agenda

Matter	Entity / Country	Initiative
Payment services	European Union	<p>Publication of Regulation (EU) 2015/751 laying down the technical and commercial requirements for card-based payment transactions, setting in particular the maximum exchange rate, where the payer's payment service provider and the payee's payment service provider are located in the European Union.</p> <p>http://clientebancario.bportugal.pt/pt-PT/Noticias/Paginas/RegulamentoMIF.aspx</p>
	European Parliament and Council of the European Union	<p>Publication of (EU) Directive 2015/2366 of the European Parliament and of the Council of 25 November 2015 on payment services in the internal market, which amends Directives 2002/65/EC, 2009/110/EC and 2013/36/EU and Regulation (EU) No. 1093/2010 and repeals Directive 2007/64/EC.</p> <p>http://eur-lex.europa.eu/legal-content/PT/TXT/PDF/?uri=CELEX:32015L2366&from=EN</p>
	EBA	<p>Discussion Paper on future Draft Regulatory Technical Standards on strong customer authentication and secure communication under the revised Payment Services Directive (PSD2).</p> <p>http://clientebancario.bportugal.pt/pt-PT/Publicacoes/OrganismosInternacionais/Documents/EBA_DP-RTSonSCAandCSCunderPSD2.pdf</p>
Mortgage credit	EBA	<p>EBA Guidelines on solvency assessment and EBA Guidelines on late payments and foreclosure. These guidelines aim to support Member States in the implementation of the Mortgage Credit Directive.</p> <p>Opinion of the European Banking Authority on good practices for mortgage creditworthiness assessments and arrears and foreclosure, including expected mortgage payment difficulties.</p> <p>http://clientebancario.bportugal.pt/pt-PT/Noticias/Paginas/EBAGuidelinesIncump.aspx</p>
Consumer credit	European Commission	<p>Launch of a campaign to disseminate consumer banking rights in consumer credit.</p> <p>http://clientebancario.bportugal.pt/pt-PT/Noticias/Paginas/CampanhaCE.aspx</p>
Structured deposits	ESAs Joint Committee	<p>Technical Discussion Paper – Risk, Performance Scenarios and Cost Disclosures in Key Information Documents for Packaged Retail and Insurance-based Investment Products (PRIIPs).</p> <p>http://clientebancario.bportugal.pt/pt-PT/Noticias/Paginas/ESA-PRIIP.aspx</p> <p>Draft proposal for regulatory technical standards on the Regulation of PRIIPs (on the content of pre-contractual information documents).</p> <p>http://clientebancario.bportugal.pt/pt-PT/Publicacoes/OrganismosInternacionais/Documents/JCESA-CP_PRIIPs.pdf</p>

Matter	Entity / Country	Initiative
Crowdfunding	EBA	<p>Opinion of the European Banking Authority on lending-based crowdfunding, which emphasizes the need for regulatory convergence to ensure market confidence and to avoid regulatory arbitrage.</p> <p>http://clientebancario.bportugal.pt/pt-PT/Publicacoes/OrganismosInternacionais/Documents/EBA_Crowdfunding.pdf</p>
Protection of financial product consumers	EBA	<p>Publication of the Consumer Trends Report in 2015.</p> <p>http://clientebancario.bportugal.pt/pt-PT/Noticias/Paginas/EBAConsumerTrends2015.aspx</p>
	ESAs Joint Committee	<p>Draft Guidelines for cross-selling practices.</p> <p>http://clientebancario.bportugal.pt/pt-PT/Noticias/Paginas/CP-JC_VendasAssociadas.aspx</p> <p>Following the discussion process of these guidelines, which resulted in the publication of guidelines only by the securities sector, a joint letter from the Chairmen of the three ESAs on legal obstacles to the adoption of these guidelines by the banking and insurance sectors was submitted.</p> <p>https://www.eba.europa.eu/-/esas-submit-a-joint-letter-to-the-european-commission-on-cross-selling-of-financial-products-in-the-eu</p>
	ESAs Joint Committee	<p>Joint ESAs Consumer Protection Day, on 3 June in Frankfurt.</p> <p>https://eiopa.europa.eu/Pages/Events/%CE%A4hird-Joint-Consumer-Protection-Day.aspx</p>
Protection of financial product consumers	EBA	<p>Guidelines on product oversight and governance arrangements for retail banking products.</p> <p>http://clientebancario.bportugal.pt/pt-PT/Publicacoes/OrganismosInternacionais/Documents/EBA_Guidelines-POG.pdf</p>
	EBA	<p>Draft Guidelines on remuneration policies for sales staff.</p> <p>http://clientebancario.bportugal.pt/pt-PT/Publicacoes/OrganismosInternacionais/Documents/EBA_CPRemunerationSalesStaff.pdf</p>
	ESAs Joint Committee	<p>Joint Committee Discussion Paper on automation in financial advice.</p> <p>http://clientebancario.bportugal.pt/pt-PT/Publicacoes/OrganismosInternacionais/Documents/JCESA-DP_AutomationFinancialAdvice.pdf</p>

3. International cooperation initiatives of banking conduct supervision

Entity	Actions carried out
BCPLP	<p>Hosting of the 2nd Meeting on Financial Inclusion and Financial Training of Central Banks of the Community of Portuguese Speaking Countries (BCPLP).</p> <p>This meeting, organised by Banco de Portugal, was attended by the Central Banks of Angola, Brazil, Cape Verde, Mozambique, East Timor and Sao Tome and Principe. In this meeting, which aims to share experiences and initiatives of the BCPLP in promoting financial inclusion and financial training, special emphasis was placed on the means of distance financial training (Portals, e-learning, apps) and financial education in schools.</p> <p>Participation, together with other Departments of Banco de Portugal, at the 3rd BCPLP Supervision Meeting, held in Brasilia from June 16 to 18.</p> <p>In this Meeting the following topics were addressed in the scope of banking supervision: supervisory model; risk-based supervision, with emphasis on credit and liquidity risks; convergence in capital allocation; banking conduct supervision; and regulatory convergence in the regulation and supervision of BCPLP.</p>
Banco Nacional de Angola	<p>Visit to Lisbon, in July 2015, of a team from Banco Nacional de Angola to carry out an internship in the Banco de Portugal's Banking Conduct Supervision Department.</p> <p>This cooperation action focused on matters related to supervision and enforcement action in the scope of banking conduct supervision: on-site and distance inspections, advertising supervision, indexed deposits and contract drafts and correction of irregularities and sanctioning.</p>
Banco Central do Brasil	<p>Participation in the Forum of Financial Citizenship 2015, an event promoted by Banco Central do Brasil, held on 4 and 5 November in Brasília.</p> <p>Aside from the 2015 Financial Citizenship Forum, working meetings were also held with heads of Banco Central do Brasil on various matters within the scope of banking conduct supervision.</p>
CEMLA	<p>Participation as speaker at the VII Conference on Economic and Financial Education in Latin America and the Caribbean, organised by CEMLA (Center for Latin American Monetary Studies) in November 2015.</p> <p>This participation was dedicated to the relationship between the protection of financial product consumer and financial stability.</p>

