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Priorities of the National Bank of Moldova for 2026-2027 regarding the supervision process of the non-bank lending sector (non-bank lending institutions and savings and loan associations)

The priorities for the supervision of the non-bank lending sector for the period 2026-2027 reflect the key directions of the National Bank of Moldova (NBM) in supervising the non-bank sector related to lending services for the next two years but may be adjusted depending on the evolution of the risk spectrum in the field concerned.

In order to ensure the stability of the non-bank lending sector and to prevent associated risks, the National Bank of Moldova continues to strengthen its supervisory capabilities, focusing on compliance with the regulatory requirements and paying increased attention to the risk management process. In this regard, deriving from the principle of risk-based supervision and considering the sector's evolution, inclusive in the context of digitalisation process, NBM established for the 2026-2027 period, the following supervision priorities of the non-bank lending sector:

I. Verification of compliance with the regulatory requirements and assessment of the risks associated with non-bank lending activities

The National Bank, using supervisory tools and methodologies, will analyse and assess the key indicators related to the activities of entities in the non-bank lending sector, verifying compliance with the regulatory requirements and the internal regulations of the entities concerned, focusing primarily on the following components:

- Business model, financial prudence, and responsible lending;
- Governance and internal control;
- Associated risks (credit risk, liquidity risk in the case of savings and loan associations, operational risk, market risk);
- Sources of financing and capital adequacy.

Credit risk remains a key aspect subject to evaluation within the non-bank lending sector supervision process. Special attention will be given to compliance with responsible lending requirements and procedures for granting and monitoring loans, the evolution of loans in relation to the entities' risk appetite, as well as the loan recovery process, particularly in the case of loans granted without collateral.

Liquidity risk is another important aspect assessed in the supervision process of savings and loan associations. In this context, priority will be given to examining compliance with prudential requirements regarding liquidity.

In addition, special attention will be given to risk management practices, primarily regarding the identification, measurement, and mitigation of specific risks, as well as aspects related to the segregation of responsibilities and the independence of control functions, and the full composition of the governing bodies as required by the statutes and legislation.

II. The reporting and data analysis process at individual and consolidated levels

The National Bank places particular emphasis on the quality of data used in the supervision process. The quality of data reported by entities in the non-bank lending sector continues to pose a challenge, generating a negative impact on the analysis and assessment of both the individual situations of entities and the sector-level analysis and comparability.

Thus, the National Bank will continue to monitor the accuracy of data reflected in the specific reports and the adherence to reporting deadlines by the entities concerned, in order to ensure the effective implementation of regulations and to promote greater transparency within the sector.

III. Prevention and combatting of money laundering and the financing of terrorism

The National Bank will continue its supervisory and control activities, focusing especially on verifying the compliance and internal risk management mechanisms related to money laundering and the financing of terrorism (ML/FT) identified by non-bank lending organisations within their areas of activity, taking into account the ML/FT risks identified at the national level within the sector. This process will be carried out through the examination of policies and procedures for client acceptance and due diligence, consistent application of precautionary measures, including enhanced measures for high-risk clients, compliance with remote client identification (eKYC) requirements, and the effectiveness of monitoring business relationships, including regarding the identification and reporting of suspicious transactions. Additionally, attention will be given to ensuring continuous training of staff by non-bank lending organisations regarding identified risks and the application of the relevant legal framework, as well as the annual internal audit of ML/FT prevention and combatting measures to verify the effectiveness of implemented mechanisms and the level of compliance.

In parallel, the NBM will intensify its constructive engagement to maintain a constant dialogue with non-bank lending organisations regarding identified deficiencies, ensuring the prompt implementation of necessary measures to combat and effectively manage ML/FT risks within the non-bank lending sector.

- The priorities of the National Bank of Moldova for the year 2025 in the supervision of the non-banking crediting sector (non-bank credit organizations and Savings and loan associations) [1]
- Priorities of the National Bank of Moldova for 2024 in the supervision of the non-bank credit sector (non-bank credit organizations and the savings and loan associations) [2]

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