

# The Business Wallet unwrapped

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# Do notice

The Business wallet as with the person wallet is a key enabler for digitalisation.

Nothing happens just because it is enabled but because the opportunity is utilised by the ecosystem.

It is now a question of ceasing the moment and for sectorial and national actors to cater for this. This can open untold opportunities.

The building blocks are there but it needs to be preferably be mandated to be used or in the minimum case be supported.

**Decarbonisation and  
competitiveness**

**Closing the  
innovation gap**

**Simplification**

**Single  
Market**



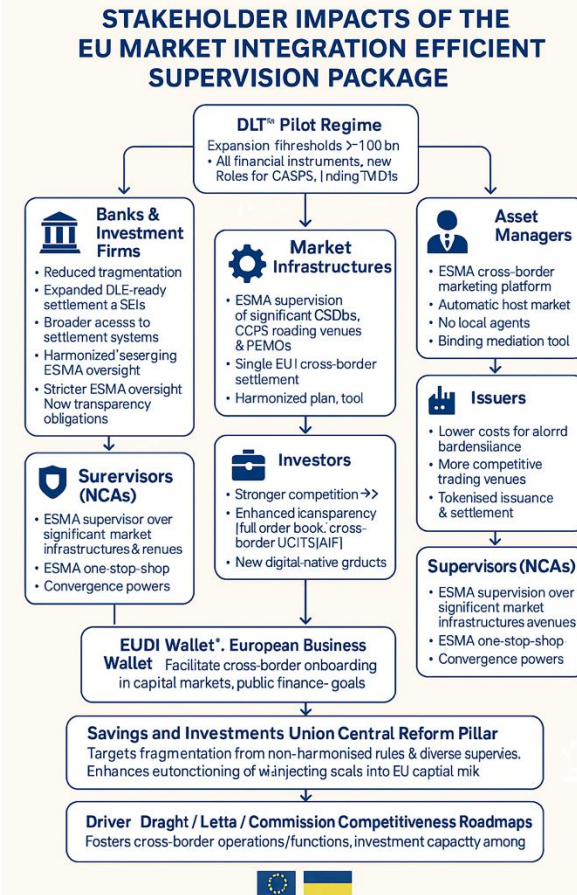
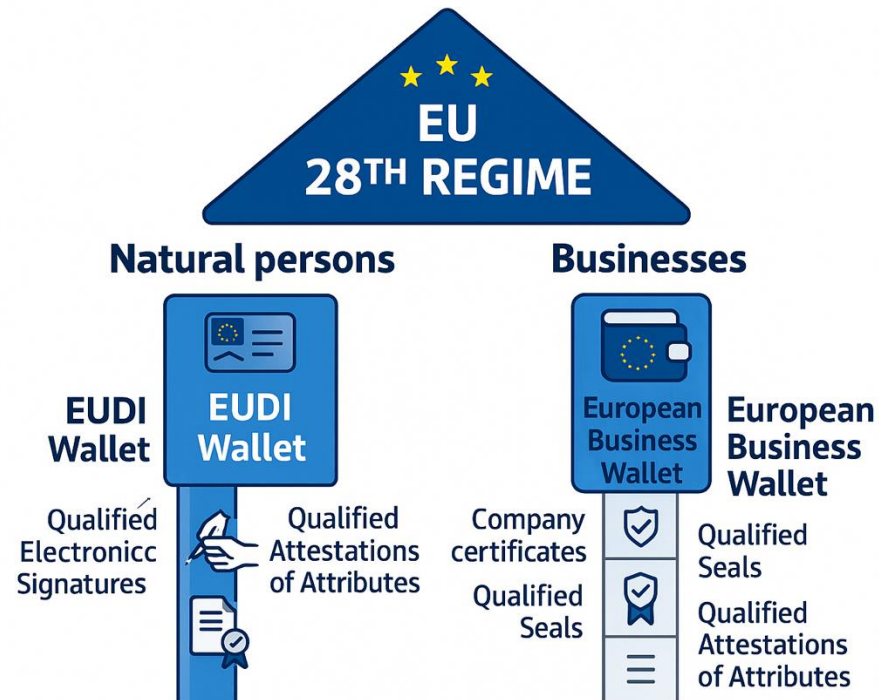
**Reducing excessive  
dependencies and  
increasing security**

**Coordination**

**The Big picture**

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# The big picture needs to be kept to understand





# 30.000 feet view

## EUROPEAN BUSINESS WALLET



↑  
**Builds on eIDAS 2.0**

Provides based on this legal certainty,  
enforceability and equivalence of electronic  
and paper-based artefacts

But not really the Wallet as defined in eIDAS 2.0

**Builds mainly on the trust  
services part of eIDAS 2.0**



Signatures and seals

Electronic attestation of attributes



Other services may be supported  
but is not directly mandated.

Reuses protocols and interfaces



## TIMELINE

- 19/11-2025 — Legal proposal presented of the European Business Wallet
- 25/11-2025 — Council negotiations formally starting on the European Business Wallet
- 19/11-2026 — Estimated conclusion of trialogue on the European Business Wallet
- 15/01-2027 — Estimated formal adoption of the European Business Wallet
- 15/01-2029 — Obligation for public sector bodies to accept the European Business Wallet
- 15/01-2030 — End of derogatory period for public sector bodies on full acceptance of the European Business Wallet

# Summary of features

## In the proposal

- Storage, management and sharing of verifiable credentials & key documents
- Secure communications & notifications
- Compliance with technical and legal standards

## Facilitated but not mandated

- Interoperability across Member States, and across business and government systems
- Regulatory / compliance integration and reporting
- Support for B2B, B2G (and potentially B2C) interactions
- Digital by default / reduction of paper / efficient processes
- Relationship to the 28th Regime

## Not in the proposal

- Digital identification & authentication of businesses and organisations

# Obligations



## Obligations on public sector bodies

### Article 16

#### Mandatory acceptance

**By 24 months** Must accept Business Wallet for economic operators to:

- (a) identify and authenticate;
- (b) sign or seal;
- (c) submit documents;
- (d) send or receive notifications.

#### Mandatory infrastructure

Have European Business Wallets  
Including Qualified Electronic Registered Delivery Service

#### Temporary derogation

**By 36 months**

May use alternative solutions instead of Qualified Electronic Registered Delivery Service

## EUDI Wallet – EU-Wide Acceptance Obligations



### Mandatory Acceptance (All Levels)

- Central Government
- Regional Authorities
- Local Authorities
- Bodies Governed by Public Law
- Public-Sector Services

**Must Accept the Wallet**  
When: Law Requires Strong Authentication



Banking  
Finance  
Telecom  
Energy  
Healthcare  
Insurance  
Regulated  
Transport

DSA-Designated Platforms  
Must Accept EUDI Wallet Login

**TikTok** **amazon** **Google**  
**Booking.com** **Snapchat**

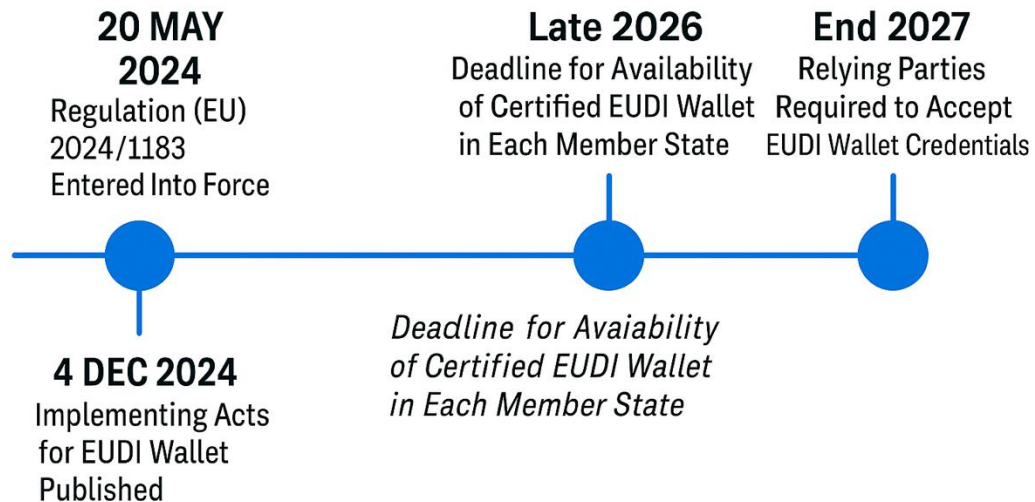
#### Examples: VLOPs

Meta TikTok Youtube  
Amazon Google X  
Booking.com Snapchat

If the user chooses the EUDI Wallet → Public bodies, regulated private sectors, and VLOPs must accept it

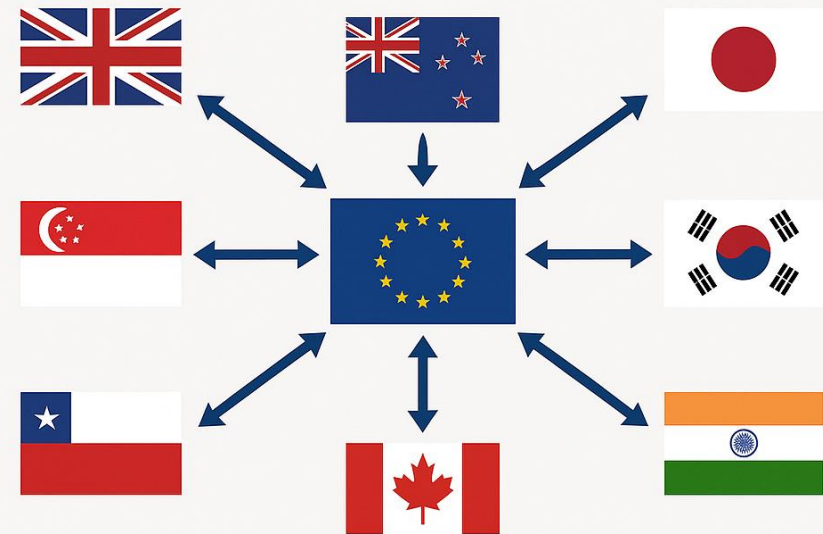
# Revisit of the Wallet

## TIMELINE OF THE EUDI WALLET



## REMOVAL OF NON-TARIFF TRADE RESTRICTIONS

Trade Agreements Including Mutual Acceptance of QEAA





## Person Wallet-Certified, level High

## Business Wallet, Declaration of conformity, Substantial

### Step 1 — The provider notifies the national supervisory body

### Step 3 — Inclusion in the EU Trusted List

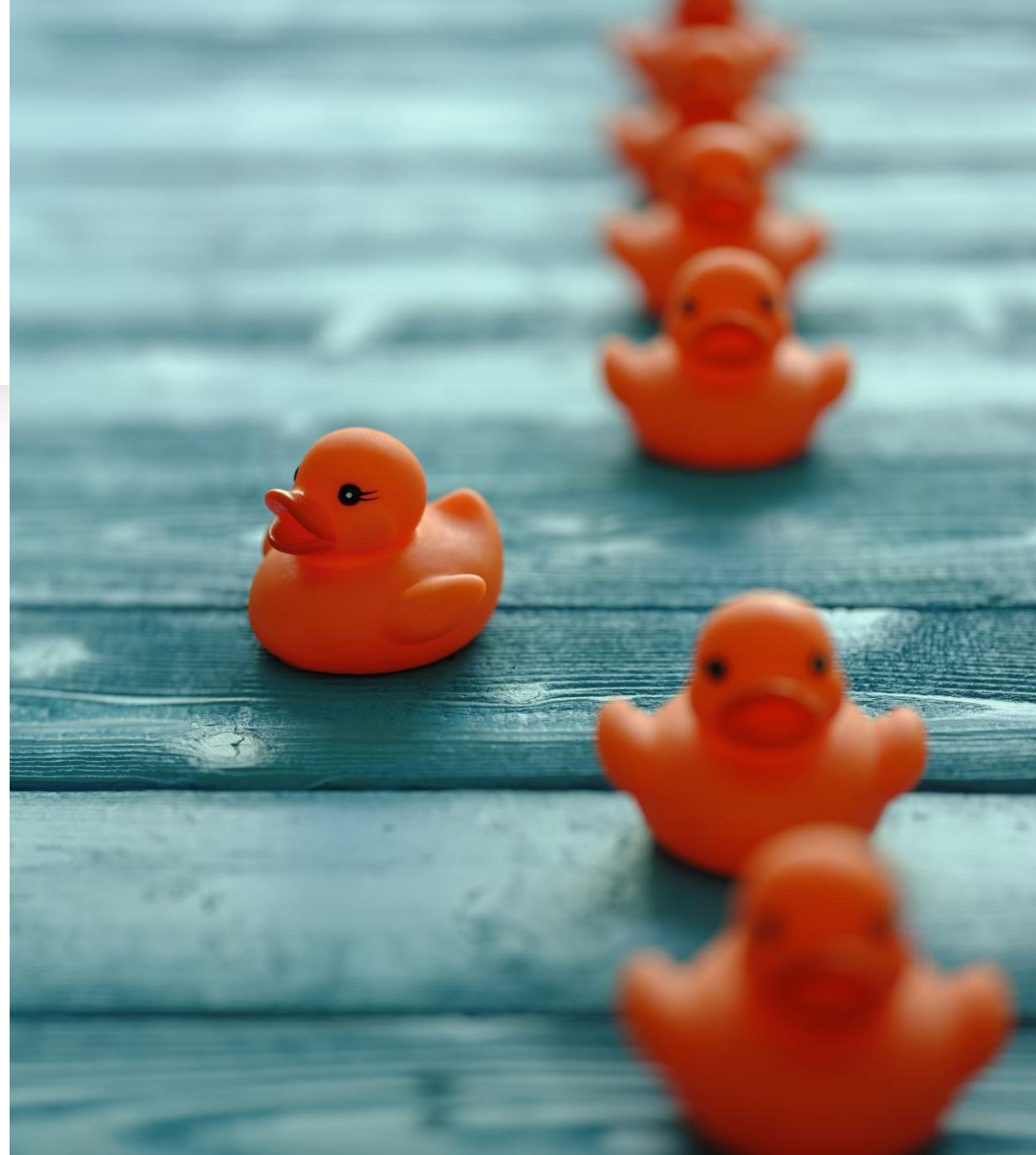
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# Diving into the details

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# Digital identification & authentication of businesses and organisations

- This is not in the regulation.
- Arguably proof of possession may serve the same purpose but with no legal certainty.
- Power of attorney will serve where similar requirements exists.



# Storage, management and sharing of verifiable credentials & key documents

- Yes in a similar way as for the person wallet.
- However these can be stored anywhere as they are self contained.
- The Wallet brings reliable proof of possession and reuse of the presentation protocols.



# Regulatory / compliance integration and reporting

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- This is likely to become a contested area towards the member states.
- There are provisions but they have been significantly watered down to pre-empt a significant part of the push back and adherence to legal prerogative.
- What is prescribed are:
  - Phase in of obligations generally but this may change both ways in discussions with parliament and council.
  - The principle of equivalence. Digital forms must be accepted and can not be denied legal effect based on form only.
- The extent of value is very much in the hands of other sectorial and national efforts.
- The ability to utilize in the general context of the competitiveness compass is of utmost importance.



# Interoperability across Member States, and across business and government systems

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- In addition to the items above the only clear provisions are.
  - A common EU unique company identifier. **(New)**
  - Harmonisation of power of attorney in the EU. **(Recycle of provisions in the company law directive)**.
- A key success factor is further harmonisation but this is mainly in the remit of the member states and other sectorial bodies.
- As such this has to be seen in conjunction with the remaining omnibus and dependent on MS and sectorial actions.
- See also the 28<sup>th</sup> Regime.

# Secure communications & notifications

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- Outbound (from Wallet) real time communication will follow what has been prescribed for the personal wallet.
- Support for qualified delivery services as described in the trust service part of eIDAS will be mandatory.
  - Thus catering for "notification" and bidirectional non real time communication.
- As discussed the usefulness would be very dependent on harmonisation of payload which is not in this regulation.

# Support for B2B, B2G (and potentially B2C) interactions

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- For B2B and B2G there are limited provisions in terms of obligations on the counterpart.
- B2C may to some extent rely on qualified delivery services especially for aspects like invoicing and other forms of communication.
- In addition to delivery services there is mandatory support for signatures and seals which can serve as enablers.
- The building blocks and facilitation is delivered but will depend on support in sectorial and national legislation.
- See also the 28<sup>th</sup> Regime.

# Digital by default / reduction of paper / efficient processes

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- In many ways the facilitation is delivered.
- However the crucial success factor is the extent this is followed up in national and sectorial harmonisation and regulation.
- In addition to delivery services there is mandatory support for signatures and seals which can serve as enablers so arguably the building blocks are within the Wallet.
- See also the 28<sup>th</sup> Regime.

# **Compliance with technical and legal standards**

- In addition to the provisions in the regulation this builds on what has been mandated for the person wallet.
- The legal provisions from this regulation applies unless specifically tied only to natural person.



# Additional aspects

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- **Internation aspects**

- Available to non-EU economic operators there is a cap on only one wallet for each operator. This is dependent on onboarding at level substantial.

- **Form factor**

- It can best be seen as a cloud based platform as a service offering. It is not SAAS as there are clear dependencies on secure hardware and other security measures.
  - For small businesses a more traditional form factor can be used or indeed the person Wallet.

- **Eligibility to offer a wallet**

- Qualified trust service providers will automatically be qualified. Remaining additional issuers will be left to the competent national authorities. A qualified provider can provide regardless of national boundaries. The requirements are “soft”.

- **The states are obliged to issue artefacts are QEAA for aspects like company number.**

# Relationship to the 28<sup>th</sup> Regime

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- As this regulation precedes the 28<sup>th</sup> regime which most likely will be a directive there are limited possibilities to legally refer to something not ready. The following is covered in recitals.
  - The European Business Wallets should aid in providing the foundational infrastructure for the forthcoming 28th Regime.
  - Foundation for fully digital procedures.
  - Foundation for EU wide operations in rapid and efficient manner.
  - The Business Wallets should complement the 28th Regime's digital-first strategy.
  - Streamline cross-border interactions and reducing administrative burden.
  - The Business Wallets should help make the “digital by default” principle a reality, facilitating the growth and development of EU companies and enhancing their competitiveness.