

GUIDE

THE REVENUE GAP

How Digital Banks Are Falling Behind on Non-Interest Income and What Leaders Are Doing Differently



INTEREST-BASED

NON-INTEREST-BASED



COVER GENIUS



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EXECUTIVE SUMMARY

The Evolution of the Foundational Bank Offering

01.

EXECUTIVE SUMMARY | THE EVOLUTION OF THE FOUNDATIONAL BANK OFFERING

As customer experience (CX) has evolved from simple transactional convenience to holistic financial wellness, the role of embedded insurance and protection has shifted from a peripheral add-on to a foundational pillar of the bancassurance offering. Banks are no longer just a place to store and move money; it is an orchestrator of safety, providing a native, integrated layer of protection that follows the customer through every digital interaction.

Net Interest Margins (NIM), also known as interest income, which peaked in late 2023, are now under sustained pressure. According to data from the [FDIC's 2023 Quarterly Banking Profile](#) and [S&P Global](#), higher deposit acquisition costs — with some incentives reaching between [\\$325](#) and [\\$500](#) per account — combined with stabilizing rates have compressed margins across the board.

Even industry leaders have not been immune. Starling Bank, for instance, saw its [NIM contract fall from 4.34% to 4.12% in 2025](#) as funding costs climbed.

Simultaneously, the interchange has transitioned from a theoretical risk to a regulatory reality. [The Interchange Fee Regulation \(IFR\)](#) of 2015 capped interchange fees for consumer debit cards at 0.2% and credit cards at 0.3% of transaction value in Europe for both cross-border and domestic transactions, teeing up future regulatory pressure banks are feeling now. [The Illinois Interchange Fee Prohibition Act \(IFPA\)](#), effective July 2026, has set a precedent by banning interchange fees on sales tax and gratuities, a move analysts expect to be mirrored in other jurisdictions. On a federal level, the Credit Card Competition Act (CCCA) [threatens a \\$227 billion loss to the U.S. economy](#) by mandating routing competition, effectively gutting the revenue streams that previously funded loyalty and rewards programs. [The Reserve Bank of Australia's \(RBA\) 2026 reforms](#) are set to remove surcharges and lower fee caps across major networks.

! The verdict

Banks relying on traditional revenue sources have entered a period of extreme volatility. To maintain Return on Equity (ROE) and satisfy investor demands for profitability, the mandate has shifted from interest-sensitive income to stable, recurring Non-Interest Income (NII).

The pivot to bancassurance 2.0

While the challenge is significant, the opportunity for those who pivot is even greater. A new cohort of orchestrators — led by global giants like [Revolut](#) and [NuBank](#) — is successfully closing this revenue gap by pivoting to the [bancassurance 2.0 model](#). By providing bancassurance directly into their digital ecosystems, these leaders are capturing a 10–15% revenue margin that others are leaving on the table.

This guide examines how digital banks are leveraging the convenience of bancassurance and no additional cost (NAC) protections to drive card activation, bridge the trust gap, and ultimately convert freemium users into high-margin, primary account holders. The goal is no longer just to be a place where money sits, but to be the invisible engine of the customer’s financial life, delivering protection that is contextual, AI-driven, and globally scalable.

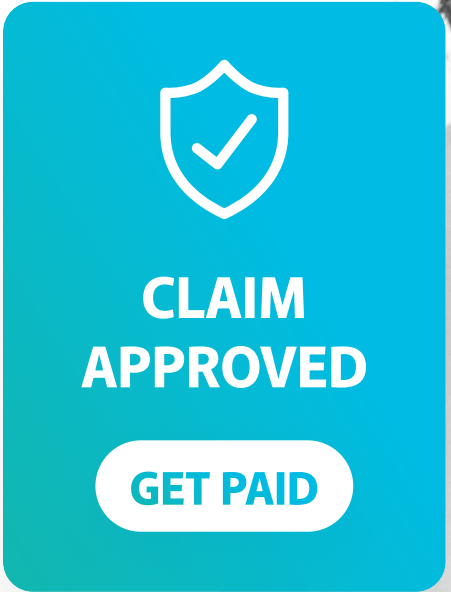
This modern foundation is built on two strategic levers:

NAC (no additional cost) engagement

Effective July 2026, the Illinois Interchange Fee Prohibition Act prohibits banks from charging interchange on the sales tax and gratuity portions of a transaction. Analysts expect other states to adopt similar legislation, with several other U.S. states already drafting similar acts.

Contextual revenue

Leveraging the trust built through NAC to offer high-margin, embedded insurance products (Travel, Cyber, Purchase Security) at the exact moment of consumer need.



EXECUTIVE SUMMARY | THE EVOLUTION OF THE FOUNDATIONAL BANK OFFERING

The scale of the addressable market remains vast for those capable of diversifying their revenue streams. The following table highlights the growth trajectory of the sectors that will define the next decade of digital finance.

Global Digital Banking and Neobanking and Bancassurance Growth Indicators (2024-2033)

TIER AND INDICATOR	2024-25 VALUE	2030-33 PROJECTION	PROJECTED CAGR	STRATEGIC ROLE
Level 1: The macro environment				
Global digital banking total (source)	~\$9.8T	\$17.41T	~8.7%	The baseline shift of the entire industry to digital
Level 2: The growth engine				
Neobanking and challenger segment (source) (source)	~\$146B - \$154.9B	\$5.05T - \$5.13T	47.3% - 48.5%	The high-velocity segment winning the most market share
Level 3: The revenue levers (NII)				
Global digital banking total (source)	~\$158.3B	\$1.02T – \$1.46T	23.1%	The \$1T+ infrastructure for high-margin fee revenue
Embedded insurance via banks (source) (source)	\$52.4B	\$132.4B - \$204B	12.3%	The direct opportunity for banks to replace interchange income
Total embedded finance value (source) (source)	\$2.6T	\$15T+	28%	The convergence of payments, lending, and protection
Level 4: The scale				
Global digital banking user base (source) (source)	~2.5B	4.4B	12%	The massive, captive audience ready for bancassurance offers

Level 1: The macro environment

Every bank is transitioning to digital banking, but an 18% growth rate in a maturing market means competition is fierce and margins are naturally thinning.

Level 2: The growth engine

Neobanks are growing at nearly 3x the speed of the broader digital banking sector by being more agile and product-focused.

Level 3: The revenue levers (NII)

While the user base grows at 12%, the embedded insurance TAM is exploding to over \$1 trillion. This revenue driver is how banks can extract significantly more value (NII) from their existing user base without relying on interest rates or revenue from credit card swipes.

Level 4: The scale

By 2033, half of the world’s population are theorized to be banking digitally. The winners will be those who can successfully attach Level 3 products to this Level 4 audience.

THE EVOLUTION OF BANCASSURANCE

Why Non-Interest Income Is a Critical Path Forward

02.



For decades, bancassurance followed a predictable, analog pattern: banks acted as a distribution channel for third-party insurance products, often hidden in fine print or sold through manual, off-platform referrals. That model has been rendered obsolete by the rapid evolution of customer experience (CX).

Modern consumers no longer view protection as a separate financial product; they view it as a foundational feature of their banking relationship. This shift has turned Non-Interest Income (NII) from a secondary objective into a critical path for survival.

When interest is no longer enough

During the initial rate hikes of 2023, many neobanks enjoyed a windfall of interest income. Data from the [FDIC's 2023 Quarterly Banking Profile](#) reveals that NIMs for the industry peaked in late 2022 and faced significant compression throughout 2024 as funding costs rose. While the [S&P Global \(2025 and 2026\)](#) projects a modest NIM expansion as rates stabilize, the volatility of the last two years has proven that relying on interest alone is a high-risk strategy.

The primary driver is the increasing cost of deposits. To maintain growth, digital banks are currently paying, on average, between \$300 and \$500 in incentives to acquire a single new account holder. When these high acquisition costs meet stabilizing interest rates, the margin is crushed. Starling Bank serves as a bellwether for this trend; its NIM contracted from 4.34% to 4.12% in 2025 as funding costs rose. For institutions without a diversified revenue stream, this compression represents a direct threat to long-term viability.

As digital interfaces have matured, customer standards have risen. A bank that merely facilitates a payment is a utility; a bank that protects the payment is a partner. Embedded protection has become the new baseline for bancassurance because it addresses the modern consumer's primary friction points — uncertainty and risk — at the moment they occur.



The end of the swipe subsidy

For years, neobanks used interchange fees — the "swipe fee" — to subsidize low-cost banking and elaborate reward programs. That model is changing due to regulatory pressure across the globe:

Interchange Fee Regulation (IFR) 2015/751

Effective June 2016, the IFR capped interchange fees for consumer debit cards at 0.2% and credit cards at 0.3% of transaction value in Europe for both cross-border and domestic transactions. It aimed to reduce merchant costs, boost competition, and harmonize European payment markets by enabling co-badging selection and restricting, then banning, card surcharging.

The Credit Card Competition Act (CCCA)

On a federal level, the [CCCA](#) mandates routing competition for credit card transactions. This is projected to cause a \$228 billion loss to the U.S. economy, specifically gutting the revenue used to fund the very rewards that keep customers loyal.

The Illinois IFPA (2026)

Effective July 2026, the [Illinois Interchange Fee Prohibition Act](#) prohibits banks from charging interchange on the sales tax and gratuity portions of a transaction. Analysts expect other states to adopt similar legislation, with several other U.S. states already drafting similar acts.

Reserve Bank of Australia's (RBA) 2026 reforms

[The RBA's reforms](#) aim to remove surcharges on debit, prepaid and credit cards on card networks including eftpos, Mastercard, and Visa. The reforms also lower the caps on interchange fees paid by Australian businesses.

Banks that rely on transaction volume as their primary revenue engine are entering a period of unprecedented volatility.

The NII mandate: targeting 40% non-interest income

The industry's top performers have set a clear benchmark: the target is now for [30% to 40%](#) of total revenue to come from non-interest income (NII). While the need for NII is universal, the strategy for capturing it has reached a fork in the road.

Historically, "No Additional Cost" (NAC) protection — like travel insurance — was the domain of traditional Tier-1 credit card programs. These programs were comprehensive but expensive, funded almost entirely by high interchange fees. However, as these fees are [regulated out of existence](#), the traditional model is changing. In Australia, the Reserve Bank (RBA) has recently announced landmark reforms effective October 2026 that aim to cap or remove surcharges and further squeeze the interchange revenue that previously subsidized premium card perks.

As a result, traditional banks are shifting strategy, removing the NAC benefits that once defined their value proposition. Many are attempting to replace these tangible protections with "closed-loop" loyalty programs, where users earn points to buy inventory from within the bank's own ecosystem. While this reduces costs, it fails to provide the real-world peace of mind that modern consumers demand.

Leading digital banks are taking the opposite approach. They view NAC not as a static cost of doing business, but as an active communication, orchestration, and engagement engine. This modern NII strategy is achieved in two parts:

NAC as an engagement tool

Instead of a "set-and-forget" insurance policy buried in a PDS, the modern orchestrator uses NAC as a reason to engage with the customer. By utilizing transaction monitoring, the bank can alert a user that a specific purchase is protected at the moment of transaction. This drives immediate awareness of benefits and moves the program from a passive cost center to an active loyalty driver.

Embedded protection and insurance

Once trust is established through high-visibility NAC perks, the bank uses those same transaction triggers to offer contextual upsells. If a user's transaction behavior suggests a need for higher-tier coverage (e.g. an international flight booking or a high-value electronics purchase), the bank can provide a premium protection offering.

By shifting from stripping benefits to save margins to using benefits to drive upgrades, digital banks are turning protection from a line-item expense into a self-funding profit center. Those who use NAC as a gateway to broader embedded insurance are building loyalty with customers to chart their path to 40% NII, while those retreating to points-based systems fall behind.

Revenue Diversification: Interchange-Dependent vs. the Orchestrators

REVENUE METRIC	INTERCHANGE-DEPENDENT BANK (LEGACY MODEL)	THE ORCHESTRATOR (MODERN MODEL)	STRATEGIC IMPACT
NII % of total revenue	20.2% (source)	35% – 45% (source)	Orchestrators are decoupled from rate volatility
Primary revenue driver	Transaction volume	Subscriptions and embedded protection	Recurring revenue is 3x more valuable to investors
Average CAC	\$300+ (source)	\$150 (Viral/organic via perks) (source)	Embedded protection lowers acquisition costs
Churn rate	35% (source)	22% (source)	Protection-based loyalty locks in the user
Margin expansion	Compressed by NIM and regulation	Expanded by 10%–15% via protection orchestration (source)	High-margin NII offsets interchange losses

NO ADDITIONAL COST

Moving Beyond Transactional Loyalty

03.



NO ADDITIONAL COST | MOVING BEYOND TRANSACTIONAL LOYALTY

In a banking landscape where interchange revenue is falling and customer acquisition costs (CAC) are climbing, the battle for top-of-wallet status is no longer won through generic cash-back rewards. Instead, the focus has shifted to who can establish the most trust. The most effective lever for this shift is no additional cost (NAC) protection, a strategy where digital banks embed essential protection (e.g., refund protection, extended warranty, and more) as a standard, non-optional perk of their core card programs. NAC is not merely an added expense; it is an engine that drives activation and acts as a gateway to high-margin, fee-based embedded insurance products.

Scaling from free to premium: increasing awareness

The true strategic value of NAC protection is not found in the insurance policy itself — which many traditional banks already offer — but in the proactive awareness of that protection. Most consumers are unaware of the coverage buried in their terms and conditions, meaning banks are paying for a benefit that yields few loyalty dividends.

The differentiator for the modern orchestrator is using NAC as a reason to communicate with the customer. By leveraging transaction monitoring, banks can surface these benefits at the exact moment of relevance, turning a latent perk into an active revenue-making opportunity. Once the bank proves its reliability by

automating a claim for an everyday issue, like a \$100 refund for a cracked screen, the friction of upselling higher-value products is eliminated.

This brand loyalty is typically formed in three phases:

Phase 1

The bank uses real-time transaction data to alert the user that their specific purchase is protected. This moves the program from a passive cost center to a visible value-add, immediately increasing the perceived worth of the account.

Phase 2

When an issue arises, the claim is filed and settled in minutes via an automated, AI-powered platform like [Cover Genius](#). By seamlessly resolving a small friction point, the bank builds a foundation of trust that legacy incumbents — reliant on manual, slow claims — simply cannot match.

Phase 3

Having experienced the tangible value of NAC protection, the user is significantly more likely to convert to a paid premium tier. At this stage, the bank can offer additional benefits, successfully turning a transactional user into a high-lifetime value (LTV) subscriber.

As traditional banks strip these benefits to salvage margins in the wake of reforms like the RBA's interchange overhaul, digital-first leaders have a unique window to win "top-of-wallet" status. The winners won't be those with the most benefits, but those who are the best at telling the customer they are protected exactly when it matters most.

What success looks like at scale

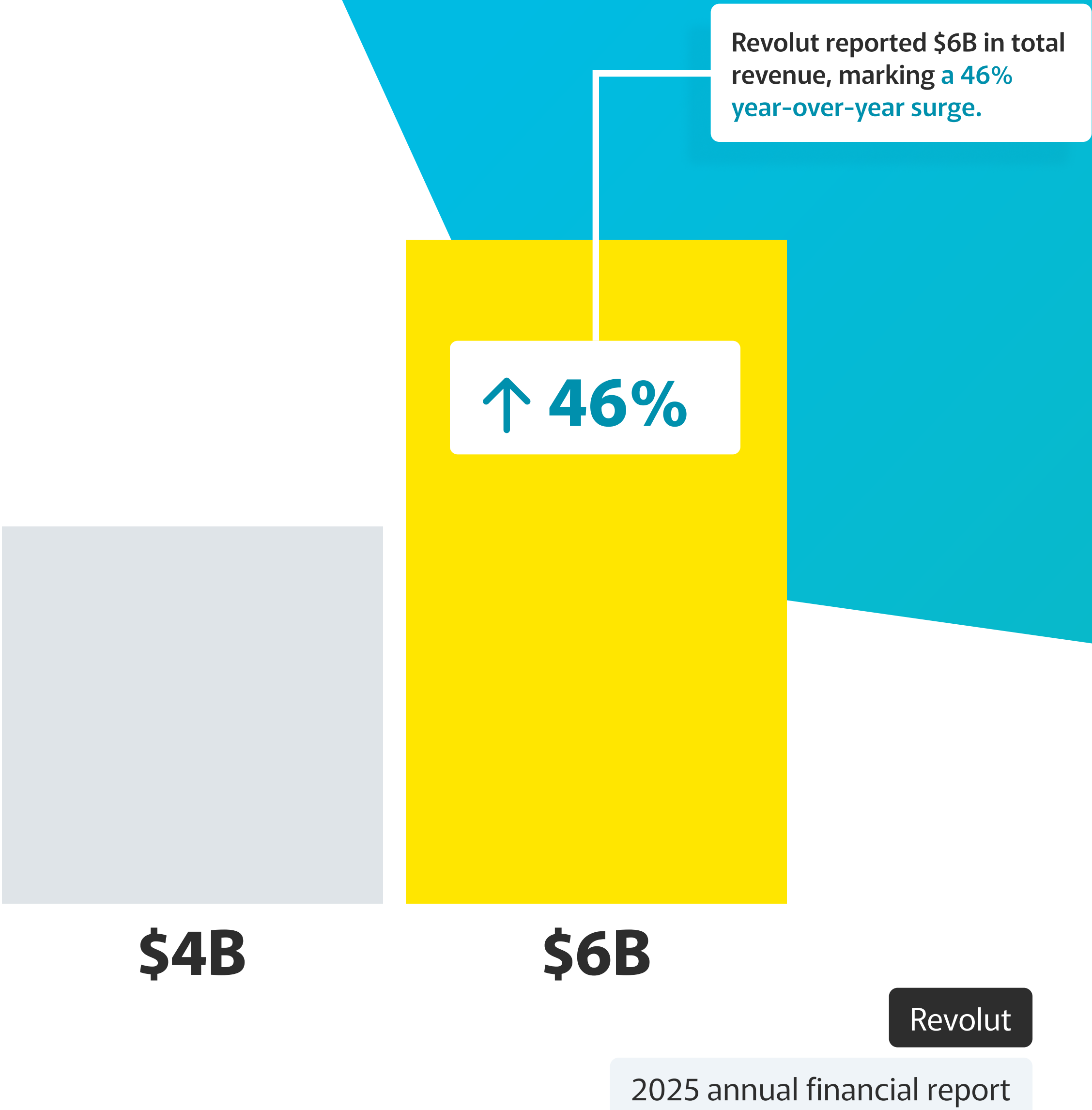
Some of the world’s most profitable digital institutions have made the transition from a utility bank to an orchestrator. The leaders have decoupled their growth from interchange and interest rates by building a diversified protection and service engine.

Revolut

Revolut stands as the definitive benchmark. In their [2025 annual financial report](#), Revolut reported \$6B in total revenue, marking a 46% year-over-year surge. This growth was not driven by a single revenue stream, but by 11 different product lines that each exceeded \$135M in annual revenue. Subscription turnover reached \$936M, a 67% year-over-year increase, and paid plan adoption increased by 42% year-over-year. Customers are increasingly willing to pay a monthly fee for a bundle of services that provide peace of mind, including travel, device, and purchase protection, if the value is clearly articulated. By diversifying away from interchange, Revolut achieved a record \$2.3B profit before tax, [with a margin of 38%](#).

Monzo

Monzo’s journey to becoming a prominent neobank was fueled by its aggressive shift toward premium subscriptions. By the end of 2025, Monzo reached 12 million customers and reported its second consecutive year of profitability with [pre-tax profits of £113.9M](#) (an 8x increase from the previous year). [Monzo’s Max tier](#) offers worldwide travel insurance (up to £5,000 cancellation, £10M medical), phone insurance, and UK/Europe breakdown cover, alongside 3.25% to 3.65% AER interest on savings, a Railcard, and monthly perks. This tier is a primary driver of its high-margin subscription income. With over 1 million paying subscribers, Monzo has built a recurring revenue base that offsets the volatility of its lending and card transaction segments.



What success looks like at scale

NuBank

NuBank has proven that the orchestrator model can scale even more rapidly in emerging markets. According to [NuBank's Q4 2025 financial report](#), Closing 2025 with 131 million customers, NuBank reported a record quarterly revenue of \$4.9B. NuBank's Average Revenue Per Active Customer (ARPAC) rose 27% to \$15, driven by high activity rates (83%) and the successful cross-selling of non-credit products. NuBank's Average Revenue Per Active Customer (ARPAC) rose 27% to \$15, driven by high activity rates (83%) and the successful cross-selling of non-credit products. Additionally, over 60% of users now consider NuBank their primary banking relationship. This "top-of-wallet" status is maintained through strategic partnerships and a suite of ["Street Mode" protections that incentivize usage](#).

Chime

Even traditionally interchange-heavy players in the U.S. are recognizing this new reality. Chime, having reached 9.5 million active members and [\\$2.2B in revenue in 2025](#), has officially previewed the launch of a premium membership tier for 2026. This move is specifically designed to target higher-earning members and diversify revenue away from transaction fees.

! The takeaway

The revenue gap digital banks are facing is not due to a lack of customers, but due to the reliance on interchange only.

Leaders like Chime, NuBank, Revolut, and Monzo are winning because they have realized that banking is no longer just about the transaction; it is about the **infrastructure of protection, building customer loyalty, and convenience surrounding the transaction.**

EMBEDDED PROTECTION

The New Infrastructure Standard

04.



Protection is no longer a peripheral add-on or a co-branded referral link hidden in a sub-menu. Embedded protection has become a core layer of the banking stack, sitting alongside payments and lending as a primary driver of NII.

The scale of this shift is best quantified by the growth of the broader embedded finance market. According to Bain & Company, the transaction value of embedded finance is projected to exceed [\\$7 trillion by 2026 in the U.S. alone](#), accounting for over 10% of total financial transactions.

Within this ecosystem, embedded insurance is the fastest-growing sub-sector. Market analysts at SkyQuest Technology project the global embedded insurance market to reach [\\$1.02 trillion by 2033, growing at a CAGR of 23.1%](#). This represents a massive, untapped margin for digital banks and neobanks, especially as market perception is shifting: a card or bank account offered without native protection is increasingly viewed as a legacy product.

This shift is driven by a fundamental change in consumer expectations. As digital lives become more complex, users expect their financial partners to provide a safety net for their transactions. [Research from Accenture](#) indicates that banking customers are increasingly willing to switch providers for better lifestyle integration and value-added services.

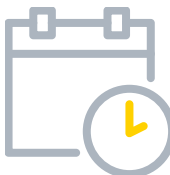
The shift to bancassurance 2.0

Offering protection and insurance used to involve slow, manual integrations with legacy brokers and co-branded landing pages that disrupted the customer experience. The new protection standard is offering an embedded protection infrastructure. Cover Genius is a trusted partner in the space, offering a seamless protection model:



A single integration for global scalability

Access a full suite of protection products across 60+ countries through a single technical gateway. Eliminate the need for fragmented legacy systems, providing a unified infrastructure that scales across your entire global footprint with no additional development work required.



The right protection at the right time

Deliver personalized, contextual protection and instant automated resolution that keeps your customers in your ecosystem. Cover Genius uses real-time transaction data to surface the right protection at the right time, meeting customers during their specific journeys.



A superior claims experience

Cover Genius turns the worst part of insurance — the claim — into a seamless, intuitive experience that delivers peace of mind when it's needed most. When customers need help, they get it instantly, not after weeks of paperwork, so claims become a loyalty moment.

Moving beyond simple travel insurance

Modern digital banks and neobanks are moving beyond simple travel insurance. The emerging standard includes a diversified portfolio of products that offer peace of mind.



Cyber and identity protection

Protecting the user's digital footprint and personal data.



Refund and return protection

Safeguarding e-commerce transactions against disputes or damaged goods.



Event and ticket protection

Covering live events and travel.



Life and health micro-coverage

Offering bite-sized life events coverage relevant to the customer's needs.

The Evolution of the Bancassurance Standard

Legacy broker (old way)	FEATURE	Embedded protection infrastructure (the new way)
Multiple APIs / co-branded links	Integration 	Single global API
High friction / off-platform	UX quality 	Native / seamless
Manual / paper-based (takes weeks)	Claims process 	AI-automated (minutes)
Referral fee (one-off)	Revenue model 	Recurring NII / subscription
12-18 months	Time to market 	4-6 weeks

The strategic advantage of integrated protection infrastructure

For product, technology, and operations leaders, the challenge of scaling a protection program is a complex navigation of data sovereignty, PII security, and multi-jurisdictional regulation. Shifting to an orchestrator mindset does not require a hand-off of the customer relationship; rather, it allows for flexible orchestration. Modern leaders are adopting a model of strategic integration where the division of front-end ownership is balanced against the bank’s internal technical capabilities and data protocols.

Ownership of the experience and data

Enterprise-level institutions often have specific requirements regarding how protection is surfaced to the customer. While a bank may choose to own the end-to-end infrastructure for deeper control, the right embedded protection partner is capable of delivering the entire journey. There are two approaches you can take:

1 Digital bank-led experience

The bank builds the front-end UI and trigger-based events internally. This ensures protection feels like a native part of the banking journey and keeps sensitive data within the bank’s immediate perimeter.

2 Partner-led experience

The partner delivers an embedded journey via a global API that also feels native to the customer journey. In this scenario, the priority shifts to tight technical alignment, ensuring that PII is transferred and stored according to the bank’s strict security standards while alleviating the bank’s internal engineering burden. The partner also leads the underwriting experience, speeding up time-to-value with a lightweight, revenue-driving solution.

In either model, the infrastructure partner acts as the engine, providing the global licenses, underwriting capacity, and automated claims handling that would otherwise require the bank to build an insurance company from scratch.

A successful launch in a Tier-1 banking environment is never an out-of-the-box event. It requires a dedicated period of co-authored solutioning. This process is a collaborative technical and compliance effort to:

- 1 Define exactly who owns each step of the customer journey
- 2 Establish secure data transfer protocols to ensure PII is handled with absolute integrity
- 3 Navigate internal red tape and security sign-offs to ensure the architecture meets the bank’s specific standards for privacy

Build vs. buy: how a specialized partner can help

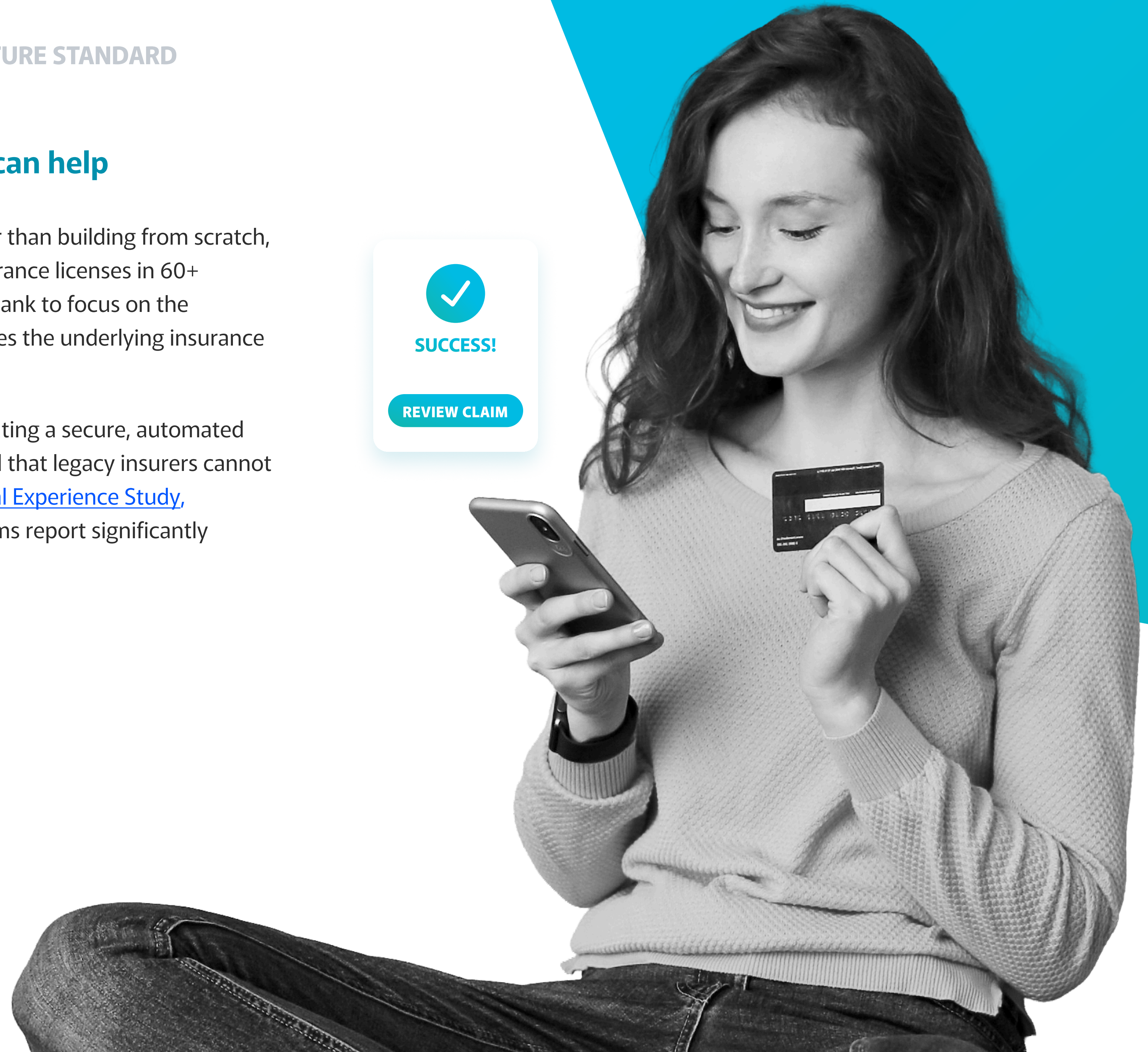
By choosing to orchestrate via a specialized partner rather than building from scratch, banks avoid the multi-year risk of securing individual insurance licenses in 60+ countries and managing capital reserves. This allows the bank to focus on the strategic application of the data, while the partner manages the underlying insurance underwriting and management.

The backend fulfillment should also be modern. By integrating a secure, automated claims layer, banks can offer their users a resolution speed that legacy insurers cannot match. According to the [J.D. Power 2024 U.S. Claims Digital Experience Study](#), customers who use digital-only tools to file and track claims report significantly higher satisfaction.



SUCCESS!

REVIEW CLAIM



POSITIONING FOR SUCCESS

05.



POSITIONING FOR SUCCESS

The era of subsidizing growth through high interchange fees and favorable interest rate spreads is being dismantled by a combination of regulatory intervention and market saturation. As the Illinois IFPA and the Credit Card Competition Act (CCCA) are posed to [reshape the unit economics](#) of "the swipe" in 2026, the gap between the industry's leaders and those who fall behind will widen.

However, this revenue gap is not a sign of a shrinking market, but of a shifting one. The growth of the global digital banking sector toward an [\\$9.38T](#) valuation by 2033 proves that the demand for digital financial services is stronger than ever. The difference is that the value is migrating from the transaction itself to the protection and convenience surrounding the transaction.

To transition from a transaction-heavy utility to a high-margin orchestrator, **digital banking leaders must audit their strategy across three key pillars:**



1 Focusing on revenue diversification

Is your NII contributing at least 30%–40% of your total revenue? If you are still over-reliant on interchange, your valuation is at risk as routing competition mandates take hold.



2 Activating NAC

Are you utilizing NAC protection to drive card activation and primary account status? Remember, 70% of users want offers tied to their spending, and meeting this demand is the most efficient way to lower your \$350+ acquisition costs. at least 30%–40% of your total revenue? If you are still over-reliant on interchange, your valuation is at risk as routing competition mandates take hold.



3 Enhancing infrastructure agility

Can you launch a new protection offering in 60+ countries in weeks? If your current model requires 18 months of manual integration, you are losing the velocity race to competitors who treat protection as a single-API layer.



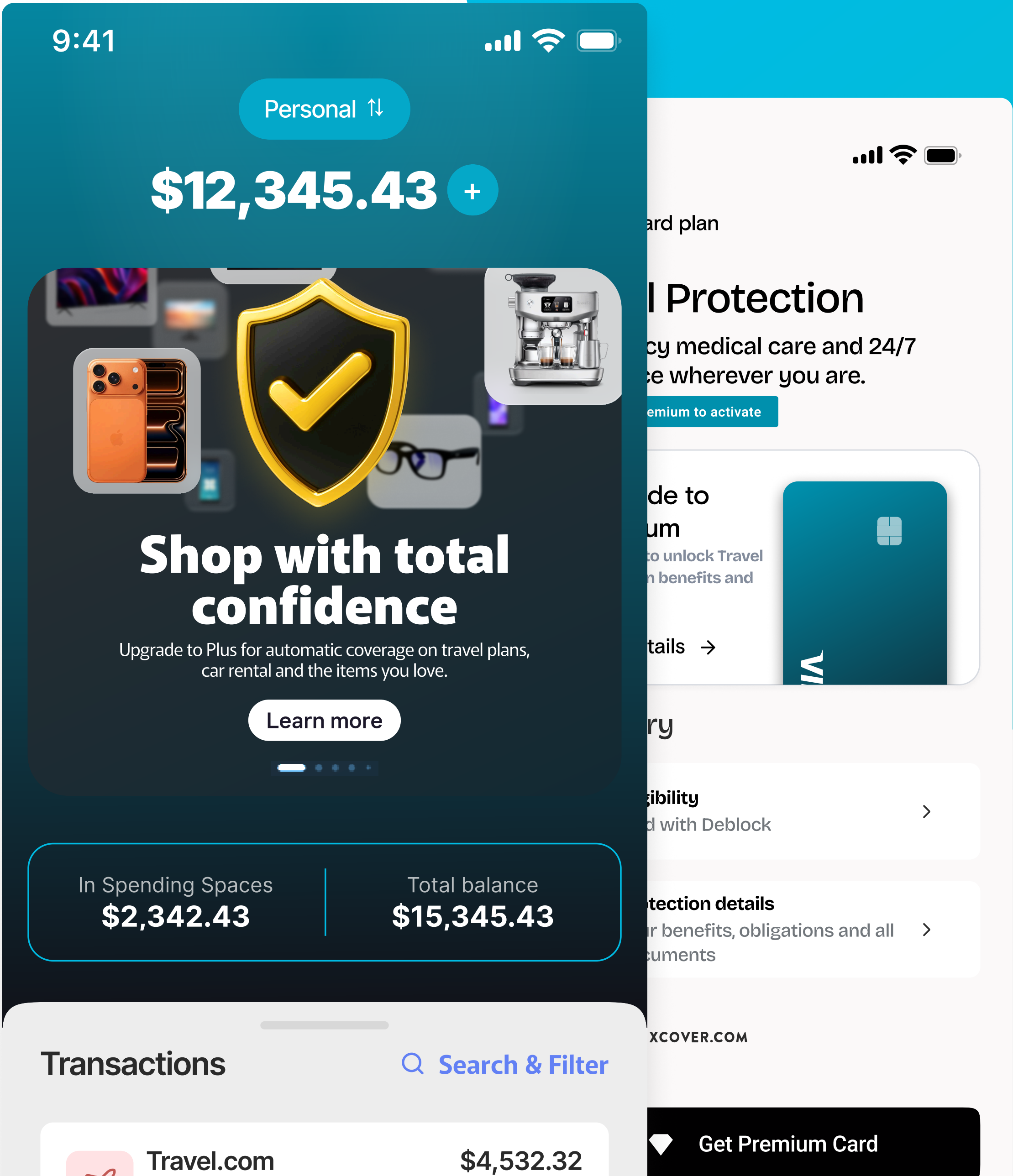
POSITIONING FOR SUCCESS

The path forward with Cover Genius

Cover Genius provides the global protection layer that allows the world’s largest digital brands to unlock revenue and enhance loyalty through seamless, AI-powered protection.

By integrating a single API, your institution gains access to a licensed, compliant, and automated ecosystem that scales as fast as you do. Whether it is bridging the trust gap through NAC refund protection or driving a higher premium tier conversion through embedded travel and cyber insurance, the goal is the same: to turn every financial interaction into a protected, high-value relationship.

Get a demo





About **Cover Genius**

Cover Genius is a global embedded protection infrastructure that connects your customers with the right coverage at the right time. We turn disrupted customer experiences into trust-building moments that drive high-margin growth. Our platform adapts to your global needs and any risk carrier, giving you total control over your insurance and protection program while we manage the complexity. Licensed or authorized in over 60 countries and all 50 US States, Cover Genius is trusted by the world's leading brands, like Amazon, Uber, eBay, and Priceline.

SUCCESS



Protected

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