MUFG Investor Services

Regulatory Round-Up for Fund Managers

Q3 2026

T+1 Related Developments

Headline: Move to T+1 settlement.
Who is impacted? Firms that may be affected by the transition to T+1 settlement, depending on their activities, jurisdictions, and operational models.

Legislation	Details
EU T+1 MEDIUM IMPACT	In July 2025, the EU T+1 Industry Committee (the Industry Committee) held a summit, presenting its High-level Roadmap (Roadmap) for transitioning to a shorter T+1 securities settlement cycle, targeted for implementation by October 11, 2027. The Roadmap is designed to serve as a practical, expert-led framework to assist market participants in identifying and addressing the most critical operational considerations and to support firms' preparations and budget allocations. The Roadmap sets out non-legally binding recommendations across nine areas: trading, matching and confirmations, clearing, settlement, asset management, FX, corporate events, securities financing transactions (SFTs), as well as legal and regulatory issues. European Securities and Markets Authority (ESMA) published a T+1 website, available here. On June 18, 2026, the EU T+1 Industry Committee published Version 2 of the EU T+1 Handbook. The updated handbook incorporates new and revised content. Version 2 is available here. On June 16, 2026, the Industry Committee published a SFT Gating Event FAQ and Best Practice document. This follows work undertaken to address a key risk identified in the EU High-Level Roadmap that, once cash bonds move to T+1 settlement, a greater proportion of repo activity may migrate to T+0 settlement, increasing intraday liquidity demands. The document is available here. The Industry Committee is finalizing readiness checklists intended to support firms' implementation efforts. These are intended to be practical tools to help firms identify gaps and assess preparedness. ESMA's Verena Ross delivered the keynote speech at the EU T+1 Industry Committee event that took place on July 3, 2026. She noted that "We are now at a critical juncture as we are moving from design to delivery. The policy direction is clear, the implementation date is fixed, and the remaining months must be used to turn planning into operational readiness across the whole trading and settlement chain." See here. On July 20, 2026, ESMA published a statement highlighting the key deadlines and action

Legislation	Details

EU T+1
 	
MEDIUM IMPACT
	points for the EU's transition to a T+1 settlement cycle. With the move scheduled for October 11, 2027, ESMA underlines that 2026 is a critical year for market participants to finalize their preparations, and identifies the first regulatory milestone as December 7, 2026 (the deadline for shifting allocation and confirmation processes to the new timing and international communication standards).
	
	ESMA encourages market participants to assess and test their own readiness and to consider the readiness of relevant participants across the trading and settlement chain. Firms may wish to consider whether their operating models, counterparty arrangements, and outsourced service providers will be ready ahead of the December 2026 milestone.
	
	EU T+1 Coordination Committee: Summary of Conclusions - On July 31, 2026, ESMA published the summary of the Committee conclusions, including:
	
	- The European Commission (EU Commission) representative confirmed that the amendments to the Regulatory Technical Standards (RTS) on settlement discipline had been adopted on July 6, 2026 and had been published on the EU Commission's transparency portal. They are now subject to the customary three-month scrutiny period by the European Parliament (EP) and the Council. Publication in the Official Journal of the European Union (OJ) is expected at the earliest in October 2026, with the first application deadline on December 7, 2026.
	
	- ESMA reported that the consultation on the review of the Guidelines on allocation and confirmations closed on July 7, 2026. ESMA will now analyze responses and finalize the Guidelines, with a publication expected at the same time as the publication in the OJ of the revised RTS on settlement discipline (in Q4 2026 with an entry into force expected on December 7, 2026). In parallel, ESMA and the National Competent Authorities (NCAs) are preparing a statement on T+1 readiness and are discussing the results of the readiness survey and the governance of the testing phase at national level.
	
	- The Industry Committee Chair presented the key highlights from the second readiness survey results:
	
	    - Continued progress in market readiness, with high awareness and increasing implementation activity: 83% of respondents are actively engaged on T+1 and implementation planning has increased materially.
	
	    - The main concern has moved from internal preparation to the readiness of counterparties, intermediaries, technology providers, and service providers. This confirms that coordination across the value chain is now the central challenge.
	
	    - Tier-one firms show positive testing readiness, with 77% indicating that they are ready to test, but questions remain on the readiness of the firms with which they transact.
	
	    - Automation remains a significant challenge across the industry, and smaller firms may be over-reliant on custodians or other intermediaries.

Legislation	Details
EU T+1 MEDIUM IMPACT	See previous Regulatory Round-Ups for earlier developments. See also the section below "Central Securities Depositories Regulation (CSDR)" for details of the proposed amendment to CSDR to accommodate the move to T+1.
UK T+1 MEDIUM IMPACT	HM Treasury established the Accelerated Settlement Taskforce (AST) to explore the case for T+1 in the UK. The Accelerated Settlement Technical Group (ASTG) recommended that the first day of UK cash securities trading for settlement on a T+1 cycle should be October 11, 2027 – aligning with the EU. In a statement, the government, Financial Conduct Authority (FCA), and the Bank of England (BoE) confirmed their support for the industry recommendation to move to T+1 settlement in UK markets by October 11, 2027 and called on industry to engage with the recommendations and start their planning. The AST has a dedicated website and the FCA has published an About T+1 Settlement webpage that, among other things, confirms the October 11, 2027 move date and details "What firms should do" in the run-up to that date. See previous Regulatory Round-Ups for developments throughout 2025 and the first half of 2026. With regard to settlement of trades in investment funds, a number of asset management trade associations have recommended that firms should alter their fund settlement timings to T+2 (that is, two business days after the trades in fund units) from October 11, 2027 – a recommendation which is welcomed by the FCA. **FCA Blog – "T+1 Settlement: are firms ready for 2027?"** – On August 13, 2026, the FCA published, "T+1 Settlement: are firms ready for 2027?" which includes concerns about the readiness of third-party providers and the buy-side sector, as well as issues relating to settlement failures. On "buy-side readiness," the FCA notes that "Some buy-side firms are making good progress, but we continue to hear concerns about buy-side sector readiness, despite the expectations we set out in our Dear CCO letter. This is consistent with the Value Exchange's findings from its Q1 2026 survey, which found most buy-side firms had yet to begin implementation work." The FCA also stated that it will "pay particular attention to buy-side firms' progress and will consider more action in this sector."

US Related Developments

Headline: Various US Developments of note.
Who is impacted? All firms doing business in the US, particularly in relation to private funds.

SEC Releases 2026 Regulatory Agenda LOW IMPACT	On July 7, 2026, Securities and Exchange Commission (SEC) Chair Paul Atkins issued a statement on the Commission's 2026 Regulatory Agenda. Atkins said the SEC is focused on investor protection, capital formation, and market efficiency, and that the agenda is intended to reflect current market realities. Several items on the agenda currently in the proposed rule stage are likely to be of interest to public companies, including disclosure reform, executive compensation

Legislation	Details
SEC Releases 2026 Regulatory Agenda LOW IMPACT	disclosure reform, registered offerings reform, and optional semi-annual reporting. The agenda also includes items on foreign private issuer eligibility, crypto assets, shareholder proposal modernization, and exempt offering pathways. Even though inclusion on the agenda does not mean the SEC will adopt a rule on any particular schedule, it may indicate where the SEC's priorities are currently focused. The post SEC Releases 2026 Regulatory Agenda appeared first on Public Company Advisory Blog.
CFTC Publishes its 2026 Regulatory Priorities Agenda LOW IMPACT	On July 7, 2026, the Office of Information and Regulatory Affairs published the list of regulatory changes the Commodity Futures Trading Commission (CFTC) plans to propose and finalize within the 2026 calendar year. This is the first regulatory priorities agenda from CFTC Chairman Michael Selig, who was sworn into office on December 22, 2025. Some items on the agenda reflect a continuation of rulemaking initiatives from then-Acting Chairman Caroline Pham's Spring 2025 agenda, which was published in September 2025, while other agenda items are new. The CFTC Agency Rule List – 2026 is available here.
Commodity Pool Operator and Commodity Trading Advisor Registration MEDIUM IMPACT	On August 18, 2026, the CFTC published a Notice of Proposed Rulemaking seeking public comments on amendments to part 4 of the CFTC's regulations. These amendments address registration requirements for commodity pool operators and commodity trading advisors, and the proposed rule aims to reduce duplicative and overlapping regulation. The proposed rule would specifically: • Add an exemption from CPO registration for certain investment advisers registered with the SEC in relation to commodity pools for which the participants are limited to certain sophisticated investors and which meet other conditions discussed in the proposal. • Add a related registration exemption for CTAs. • Increase the capital contribution threshold in the current CPO registration exemption for small commodity pools, also known as the small pool exemption, to reflect inflation. Comments will be accepted until October 5, 2026.

Legislation	Details
CFTC, SEC Seek Public Comment to Further Clarify and Harmonize Derivatives Product Definitions LOW/MEDIUM IMPACT	On June 18, 2026, the CFTC and SEC issued a joint request for public comment on potential opportunities to further update, clarify, and harmonize certain derivatives product definitions and interpretive issues. The request for comment is intended to support the Commissions' ongoing evaluation of whether current regulatory definitions, interpretations, and jurisdictional frameworks appropriately reflect evolving market structures, financial products, and trading practices. The joint request for comment seeks input on the following topics: - Definitions relating to swaps and security-based swaps, including the scope of certain exclusions from the swap definition. - Treatment of mixed swaps. - Treatment of novel or emerging products. - Jurisdictional and interpretive questions. - Potential areas in need of greater clarity regarding regulatory definitional lines. - Potential areas for alternative compliance. The public comment period will remain open for 60 days following publication of the request for comment in the Federal Register. The CFTC's document is available here and the SEC's document is available here.
Private Fund Reporting by Registered Advisers LOW/MEDIUM IMPACT	Registered investment advisers that manage "Private Funds" above certain RAUM thresholds must file Form PF, the confidential reporting form used by certain private fund advisers. On September 17, 2025, the SEC and CFTC each voted to further extend the date for investment advisers to comply with amendments to Form PF to October 1, 2026. On August 31, 2026, the SEC and the CFTC adopted a joint final rule further extending the compliance date from October 1, 2026 to July 1, 2027. See the Q4 2025 Regulatory Round-Up for details. On April 20, 2026, the SEC and the CFTC proposed further amendments to Form PF to: - eliminate filing requirements for smaller advisers; - eliminate certain reporting requirements for smaller hedge fund advisers; - eliminate, streamline, and simplify certain other reporting requirements; and - make corrections and other revisions. The proposing release for Form PF amendments is published on the SEC's website and was published in the Federal Register on April 24, 2026. The comment period closed on June 23, 2026. See here and the related press release here.

Legislation	Details
SEC Proposes Rescinding its Climate-Related Disclosure Rules LOW/MEDIUM IMPACT	The SEC issued the Climate-Related Disclosure Rules (the Rules) in March 2024, which would have required public companies to provide certain climate-related information in their registration statements and annual reports of issuing and reporting companies. The SEC ordered a stay of the Rules in April 2024 and, in March 2025, the SEC ended its defense of the Rules. The SEC now proposes to withdraw the Rules, stating that they exceed the scope of the SEC's authority. The SEC also states that the Rules: (1) are unnecessary and inconsistent with a registrant-specific, materiality-based approach to disclosure; (2) stray well beyond the policy concerns of federal securities law; (3) impose significant costs on public companies and shareholders that are not justified by the informational benefits they provide to some investors; and (4) the high costs of the Rules are at odds with the SEC's objectives of facilitating capital formation and promoting public company status. The feedback period closed on August 3, 2026.

EU Developments

Headline: Various EU Developments of note
Who is impacted? Asset management and related firms doing business in the EU that may be affected by the relevant developments.

EU Commission Market Integration & Supervision package MEDIUM IMPACT	In December 2025, the EU Commission released the Market Integration & Supervision package (MISP) under the Savings & Investments Union (SIU). The EU Commission describes it as "a comprehensive package of measures designed to remove barriers and unlock the full potential of the EU single market for financial services." The MISP comprises two Regulations and one Directive that together amend 19 existing pieces of EU legislation: • One of the Regulations proposes to transform the Settlement Finality Directive and the Financial Collateral Directive into regulations. • The second, more prominent Regulation touches on a variety of files, including the European Market Infrastructure Regulation (EMIR), Markets in Financial Instruments Regulation (MiFIR), CSDR, Cross-Border Distribution of Funds Regulation (CBDFR), Securitisation Regulation, Credit Ratings Agencies Regulation, and the Benchmarks Regulation - see here. • The proposed Directive amends the Undertakings for Collective Investment in Transferable Securities (UCITS) Directive, the Alternative Investment Fund Managers (AIFMD), and Markets in Financial Instruments Directive (MiFID). The CBDFR is also subject to amendments but proposed changes are included in the Regulation - see here. Some key initiatives proposed in the MISP include: (i) transfer of rules from directives to regulations; (ii) reduction of gold-plating by individual NCAs; (iii) centralization of

Legislation	Details
EU Commission Market Integration & Supervision package MEDIUM IMPACT	supervision; (iv) derogation from delegation in some Intra-group arrangements; (v) amendments to the pre-marketing regime; and (vi) depositary passports. See previous Regulatory Round-Up for details of the SIU. The MISP continues to make its way through the EU's legislative process. The Council had a meeting scheduled for September 10, 2026 to discuss the MISP.
Political agreement reached on Retail Investment Strategy (RIS) MEDIUM IMPACT	In May 2023, the EU Commission adopted its new RIS, which consisted of two "mutually reinforcing" legislative proposals: • A proposed directive amending among others, the UCITS Directive, AIFMD, and MiFID II as regards the EU retail investor protection rules (referred to by the EU Commission as the Omnibus Directive). • A proposed regulation amending the regulation on key information documents (KIDs) for Packaged Retail and Insurance-based Investment Products (PRIIPs). In terms of changes to the KID, the RIS is introducing a "Product at a glance" dashboard, requiring machine-readable KIDs for European Single Access Point purposes. Even though additional new information must be disclosed, the three-page limit will remain for KIDs. In December 2025, the Council of the EU published a press release announcing that it had reached provisional political agreement with the EP on the legislative proposals relating to the EU Commission's RIS. The EP also published a press release on the agreement. The December 2025 provisional agreement was approved by the Council of the EU on June 5, 2026 and by the EP on June 23, 2026. The adopted text is subject to legal-linguistic review, but the EU Commission has indicated that it does not expect any notable changes. Final adoption by the EP and the Council is expected in Q4 2026 before being published in the OJ. Member States will have 24 months to transpose the Omnibus Directive and must apply implementing measures 30 months after entry into force; the Regulation will generally apply 30 months after entry into force, subject to certain PRIIPs amendments applying from entry into force. Assuming the Omnibus Directive is published in January 2027 and that a 30-month implementation period applies, the provisions will apply from July 2029. Several provisions in the Omnibus Directive will be specified in Level 2 measures (delegated regulations and delegated directives), which Member States will also need to transpose. On August 24, 2026, the EU Commission published a call for advice issued to ESMA and a call for advice issued to EIOPA (both dated July 30, 2026) for technical advice on those Level 2 measures set out in the Omnibus Directive.

Legislation	Details
ESMA Prioritisation of 2026 deliverables LOW/MEDIUM IMPACT	On June 2, 2026, ESMA sent a letter to the EU Commission notifying it that ESMA has reprioritized its 2026 work program. ESMA states that following the MISP proposal and emphasis on simplification, it is postponing or deprioritizing a limited set of RTS, guidelines, and reports (Annex I) to avoid duplicative or inconsistent changes. It is diverting resources to higher-priority workstreams, such as continued work on simplification and burden reduction notably in the data reporting space; T+1 preparation; assessing the impact of tokenization and monitoring risks arising from geopolitical instability; and EMIR 3 implementation.
EU Commission De-Prioritization of certain Level 2 Measures LOW/MEDIUM IMPACT	In October 2025, the EU Commission published a letter setting out certain non-essential Level 2 acts (i.e., regulatory and implementing standards that supplement or specify the EU Regulations and Directives (Level 1 acts)) relating to financial services that it is de-prioritizing. The EU Commission considers 115 Level 2 measures as non-essential for the effective functioning of the Level 1 legislation and for the achievement of EU policy objectives. These are set out in an Annex to the letter and the EU Commission will not adopt the acts listed before October 1, 2027. See the Q4 2025 Regulatory Round-Up for details.
EU transaction reporting framework MEDIUM/HIGH IMPACT	In June 2025, ESMA published a Call for Evidence (CfE) on simplifying transaction reporting requirements across EU financial markets. On May 4, 2026, ESMA published an Interim Report on the simplification of financial transaction reporting following the CfE. ESMA considered two options: • Option 1a: maintain separate regimes with clearer delineation (MiFIR for ETDs, EMIR for OTC derivatives) – as was proposed in the CfE - but with three sub-variants to this option. In the Interim Report, ESMA confirms that under this option 1a, there would be no extension of reporting obligations to UCITS/AIFMD and notes that it is looking at the possible expansion of mandatory delegated reporting and simplification of reconciliation requirements. • Option 2a: move toward a single integrated reporting framework combining MiFIR, EMIR, and Securities Financing Transactions Regulation (SFTR). The interim report suggested that ESMA supported this option as a long-term solution through a phased approach (in line with stakeholders' general feedback). On July 2, 2026, ESMA published its Final Report on a comprehensive approach for the simplification of financial transaction reporting under MiFIR, EMIR, SFTR, and sectoral regulation. The Final Report contains recommendations aimed at supporting the simplification and integration of transaction reporting, and the analysis underlying the recommendations. ESMA recommends focusing on the implementation of the targeted set of independent intermediate measures that could be implemented with limited or negligible implementation costs and provide tangible burden reduction in the short term.

Legislation	Details

EU transaction reporting framework
 	
MEDIUM/HIGH IMPACT
	ESMA recommends a staged approach:
	
	- Longer term measures - developing a single integrated transaction reporting framework across MiFIR, EMIR, and SFTR, based on a "report once" principle.
	- Short- and medium-term independent intermediate measures: the eight measures (summarized in tables 3 to 11 of the final report) aim to provide early relief and support the transition to the longer-term framework. These measures include (among others)
	  - Revision of dual-sided reporting, under EMIR and SFTR, through delegated reporting;
	  - Streamlining the intragroup reporting exemption framework under Article 9 EMIR;
	  - Targeted adjustment of EMIR reconciliation fields; and
	  - Simplification of Errors and Omissions notification framework under EMIR.
	
	Next steps depend on the recommended Level 1 changes being agreed in the context of ongoing negotiations relating to relevant MiFIR, EMIR, and SFTR provisions.
	
	If Level 1 negotiations conclude with all the necessary changes to the Level 1 framework made by mid-2028, ESMA expects the new integrated reporting model to be operational within five years. Once there is sufficient certainty on the Level 1 change, ESMA will set up the necessary arrangements for the implementation phase. With this set up, ESMA could aim to complete the work on the integrated Level 2 template by mid-2029. Considering this and the need to allow for 12-18 months of lead time for market participants' implementation, the fully integrated solution could be in place toward H2 2031.

Sustainable Finance

EU Commission's proposed amendments to SFDR MEDIUM IMPACT	**Headline:** Proposals to amend Sustainable Finance Disclosure Regulation (SFDR) **Who is impacted?** Asset managers and other financial market participants in scope of SFDR, as applicable. In November 2025, the EU Commission adopted a proposed Regulation amending SFDR (Regulation (EU) 2019/2088) and repealing the SFDR RTS (Commission Delegated Regulation (EU) 2022/1288). To recap, the EU Commission proposed that the existing categories of Article 6, Article 8 and Article 9 funds be deleted and replaced with a new product categorization system. The new categories are broadly summarized as: - "Transition" - Article 7 - invests in financial products that invest in the transition of undertakings, economic activities, or other assets toward sustainability, or contribute to such transition;

Legislation	Details
EU Commission's proposed amendments to SFDR MEDIUM IMPACT	- "ESG Basics" - Article 8 - integrates sustainability factors in their investment strategy beyond the consideration of sustainability risks; - "Sustainable" - Article 9 - invests in sustainable undertakings, sustainable economic activities, or other sustainable assets, or contributes to sustainability; - "Combination" - Article 9a (a mixed category for products with characteristics from Articles 7, 8 and/or 9); and - "Impact" - subcategory of Article 7 or Article 9 (as appropriate) – must have as its objective generation of predefined, positive and measurable social or environmental impact. On June 24, 2026, the Council published a press release announcing that it has agreed its negotiating position on the proposed Regulation amending SFDR and the PRIIPs Regulation and repealing the SFDR RTS. The Council followed this up on June 25, 2026, with publication of a note. The Council broadly supports the EU Commission's proposals for new categories replacing the current Article 6, 8, and 9 architecture. The EP's progress has been slower than the Council's, with MEPs tabling almost 600 amendments following the Rapporteur's draft report. The ECON vote planned for July 15, 2026, to approve the EP's position was postponed and a plenary vote is expected the week of September 14, 2026. It is possible that trilogue negotiations between the EU Commission, Council, and EP could commence at the end of September or beginning of October 2026. Trilogue negotiations may continue through the fall of 2026 and, if agreement is reached promptly, the final SFDR 2.0 text could become available by the end of 2026. However, this timing is ambitious and subject to legislative developments. Once finalized, the draft Regulation states that it will enter into force 20 days after publication in the OJ and will apply 18 months after that.
FCA's sustainability disclosure requirements (SDR) and investment labeling regime LOW IMPACT	**Headline:** UK sustainability disclosure requirements, investment labeling regime and anti-greenwashing rule. **Who is impacted?** All FCA-authorized firms that make sustainability-related claims about their products and services (anti-greenwashing rule only), UK asset managers (SDR and labeling regime), and firms offering portfolio management services. See previous Regulatory Round-Ups for details.

Legislation	Details

EMIR

EU EMIR 3.0

MEDIUM
IMPACT

Headline: Changes to the current EU EMIR are coming.
Who is impacted? Firms within scope of EU EMIR, as applicable.

EMIR 3.0 is intended to mitigate what the EU deems excessive exposures to third-country CCPs and improve the efficiency of EU clearing markets. EMIR 3.0 introduces an active account requirement (AAR). It also revises clearing threshold changes and makes changes to certain of the risk mitigation techniques, as well as the reporting of clearing activity in recognized non-EU Central Counterparties (CCPs).

EMIR 3.0 came into force on December 24, 2024; however certain changes and compliance requirements are subject to a phase-in period and multiple related RTS are to follow. The Amending UCITS Directive also entered into force on December 24, 2024 but Member States had until June 25, 2026 to transpose it into national law. EMIR 3.0 is available here, and the Amending UCITS Directive available here.

The consolidated text of EMIR as amended is available here.

EMIR 3.0 Secondary Legislation

EMIR 3.0 requires ESMA to produce 28 sets of RTS and implementing technical standards, as well as guidance.

The most high-profile change introduced by EMIR 3.0, the AAR, requires in scope counterparties to open active accounts within six months after the entry into force of EMIR 3.0 (i.e., from June 2025).

- **Clearing Thresholds**
- EMIR 3.0 also introduces clearing threshold changes. Following an earlier consultation, on February 25, 2026, ESMA published its related Final Report, see here.
- ESMA has stated that counterparties may apply the new methodology during their usual annual calculation window, typically June, or earlier if they wish to benefit from the new regime.
- On July 14, 2026, the EU Commission adopted a Delegated Act "amending the regulatory technical standards laid down in Delegated Regulation (EU) No 149/2013 as regards the clearing thresholds and the mechanisms triggering their review".
- The Delegated Act modifies Delegated Regulation (EU) No 149/2013 by:
    - Amending Article 11: to set the clearing thresholds values applicable to aggregate positions for financial counterparties.
    - Inserting Article 11a: to set the clearing thresholds values applicable to uncleared positions.

Legislation	Details
EU EMIR 3.0 MEDIUM IMPACT	◦ Inserting Article 11b: to devise the mechanisms triggering a review of the values of the clearing thresholds. • The Delegated Act (DA) is subject to a three-month scrutiny period in the EP and the Council. If there are no objections by the co-legislators, the DA will be published in the OJ and enter into force 20 days after the publication. • **Article 7d reporting** • On August 18, 2026, ESMA issued a Consultation Paper on a proposed annual reporting framework under EMIR 3.0 for clearing activity at recognized third-country central counterparties (TC-CCPs). The aim is to improve supervisory visibility of EU firms' exposures to such TC-CCPs. • ESMA focuses on the following issues in the consultation paper: ◦ Scope: The reporting requirement applies to both clearing members and clients, but not to indirect clients. Contrary to most provisions introduced under EMIR 3, the new reporting obligation applies not only to derivative contracts but also to the broader category of "financial instruments or nonfinancial instruments". As a consequence, the scope of instruments to be captured extends beyond those currently reported under EMIR Article 9 and may include, in addition to derivatives, SFTs, securities, and non-financial instruments cleared through TC-CCPs. ESMA highlights that, consequently, any assessment of the extent to which the information required under Article 7d can be sourced from existing reporting frameworks cannot be limited to EMIR data alone. It must also take into account other relevant reporting, which may differ in scope and in the level of data granularity. ◦ Gap analysis: ESMA identifies information that is already available through existing reporting frameworks and where more granularity will be required. ◦ Content and format of reporting: The proposed approach in the RTS prioritizes the reuse, alignment, and aggregation of existing data and limits new reporting requirements to what is necessary under EMIR. The ITS introduce a harmonized reporting format. • The deadline for responding to the consultation paper is October 12, 2026. ESMA expects to publish a final report in Q4 2026.
(UK EMIR) Third country CCP equivalence LOW/MEDIUM IMPACT	On July 13, 2026, the Central Counterparties (Equivalence) Regulations 2026 (SI 2026/779) were published, together with an Explanatory Memorandum, confirming that HM Treasury made equivalence determinations in relation to the regulatory framework for the authorization and supervision of CCPs by their regulators in the following jurisdictions: Australia, Japan, the US (for CCPs under SEC authorization), Hong Kong, India, the UAE, and South Africa.

Central Securities Depositories Regulation (CSDR)

Headline: Changes to the EU CSDR regime.
Who is impacted? Firms within scope of EU CSDR, as applicable.

Legislation	Details
EU Commission adopts Delegated Regulation under CSDR LOW/MEDIUM IMPACT	CSDR establishes a periodic review and evaluation process according to which central securities depositories (CSD) competent authorities are to review the arrangements, strategies, processes and mechanisms implemented by a CSD with respect to compliance with the CSDR and evaluate the risks to which the CSD is, or might be, exposed or which it creates for the smooth functioning of securities markets or stability of the financial markets. CSDR Refit introduced certain amendments to the CSD review and evaluation process, in particular by (i) reducing the mandatory frequency of the review and evaluation from at least every year to at least every three years, (ii) strengthening the process for consulting CSD relevant authorities, and (iii) extending the range of authorities receiving the results of the review and evaluation. In light of these changes, CSDR Refit also included mandates for ESMA to revise the existing RTS and implementing technical standards on review and evaluation. ESMA carried out a public consultation and submitted its final report on the draft RTS in February 2025.
EU Commission adopts Delegated Regulation under CSDR LOW/MEDIUM IMPACT	On July 6, 2026, the EU Commission published Delegated Regulation amending the RTS in Delegated Regulation (EU) 2017/392 as regards the information a CSD provides to its competent authority for the review and evaluation process in Article 22(1) of the CSDR. The RTS on the review and evaluation process are expected to apply one year after the Delegated Regulation enters into force. The Council of the EU and the EP will now scrutinize the Delegated Regulation. If neither object, it will enter into force 20 days after publication in the OJ. For details of the CSDR Refit Regulation, see Q2 2026 Regulatory Round-Up.
EU Commission adopts measures to increase settlement efficiency LOW/MEDIUM IMPACT	CSDR harmonizes the conduct of securities settlement in the EU and the rules governing CSDs. One of the objectives of the CSDR is to incentivize a high level of settlement efficiency of securities transactions. CSDR introduces measures to prevent and address settlement fails and encourage market participants to settle transactions on the intended settlement date, with the measures commonly referred to as the settlement discipline regime. Following an earlier consultation, on October 13, 2025, ESMA published its Final Report on amendments to the RTS on settlement discipline. The final draft RTS aim to enhance settlement efficiency across the EU and facilitate the transition to a T+1 settlement cycle by October 11, 2027. They are also designed to reduce the administrative burden on CSDs and market participants.

Legislation	Details
EU Commission adopts measures to increase settlement efficiency LOW/MEDIUM IMPACT	On July 6, 2026, the EU Commission adopted Delegated Regulation amending Commission Delegated Regulation (EU) 2018/1229, with regard to RTS on settlement discipline. The RTS introduce measures that support settlement efficiency in the EU and simultaneously pave the way for a smooth implementation of T+1 settlement in the EU. The intention is that the RTS on settlement discipline will largely apply from December 7, 2026.
ESMA consults on measures to prevent settlement fails and on amending CSDR guidelines to support transition to T+1 MEDIUM IMPACT	On May 26, 2026, ESMA published a consultation paper on amending its guidelines on standardized procedures and messaging protocols used between investment firms and their professional clients. ESMA proposes amending the guidelines to ensure they are consistent with the proposed amendments to the RTS on settlement discipline. ESMA decided not to wait for the EU Commission's endorsement of the final RTS, believing that the early publication will help ensure stakeholders can actively contribute to finalizing the amended guidelines. However, it will reassess the position when the final RTS are endorsed. The proposed amendments are designed to enhance settlement efficiency and support a smooth transition to T+1. ESMA also proposes clarifying the discretion available to investment firms and professional clients when documenting their contractual arrangements. The comment period closed on July 7, 2026. ESMA plans to finalize the amended guidelines by October 2026.
AIFMD 2.0 and related ESMA Consultations LOW/MEDIUM IMPACT	**Headline:** Changes to AIFMD and to some extent the UCITS Directive. **Who is impacted?** Entities in scope of AIFMD and UCITS Directive, and asset managers outside the EU that wish to market in the EU, as applicable. AIFMD 2.0 took effect on April 16, 2026. See here. AIFMD 2.0 makes targeted changes to certain provisions of AIFMD, including the following: - Delegation, Authorization, Disclosure to Investors, and Reporting. - A new Loan Origination regime. - Liquidity Management Tools (LMTs). See previous Regulatory Round-Ups for details.

Legislation	Details

OTHER

ESMA Final Report on the integrated collection of funds' data

MEDIUM/HIGH IMPACT

AIFMD 2.0 mandated ESMA to submit a report to the EU Commission by April 16, 2026, on the development of an integrated reporting system of supervisory data. ESMA published a discussion paper in July 2025 in order to consult interested parties for the purpose of informing its decisions when developing the recommendations that form this final report. The Final Report on integrated reporting was published on May 4, 2026.

The Final Report outlines the key design principles, preferred options, and implementation approach for achieving greater integration, while identifying the immediate next steps to be taken through the development of RTS and Implementing Technical Standards (ITS). It also sets out ESMA's recommendations for the development of an integrated reporting system, including:

- the establishment of a single, modular and dynamic reporting template;
- the development of a common regulatory data dictionary and aligned data semantics;
- a "report once, use many times" reporting flow based on national collection and a centralized EU data hub;
- centralized data validation, data sharing and common analytics;
- principles on data granularity, proportionality, and reporting frequency; and
- legal and governance considerations for implementation within the Final Report in the context of the forthcoming work on the RTS and ITS under AIFMD 2.0.

ESMA recommends a clearly defined two-phase implementation strategy. During Phase 1, AIFMD and UCITS supervisory reporting requirements would be consolidated. This initial phase will also provide the necessary time to develop and implement the underlying technical infrastructure required to support the new reporting framework.

Phase 2 would subsequently extend integration to encompass the Money Market Fund Regulation, statistical reporting requirements, and potentially other reporting obligations applicable to the fund sector. ESMA states that throughout each phase, existing reporting templates and instructions would remain in force and continue to be applied until they are superseded by the newly developed templates and the integrated reporting framework is implemented, tested, and demonstrated to be sufficiently robust and reliable. In terms of timing, Phase 1 will start with the development of draft RTS and ITS that ESMA is mandated to deliver by April 2027. Given the number of steps that need to be taken under Phase 1, it could be implemented by 2029 at the earliest, depending on timely progress of the respective steps. The implementation of Phase 2 should follow immediately and will require an additional few years.

UK Post-Brexit Regulatory Developments

Headline: UK Post-Brexit Regulatory developments.
Who is impacted? Firms doing business in the UK.

Legislation	Details

Revision of the regulatory framework for UK AIFMs Consultations
 	
MEDIUM/HIGH IMPACT
	In April 2025, two papers were published that could have a significant impact on asset management in the UK and herald the beginning of regulatory divergence between UK and EU regulation of alternative investment fund managers. Notably, the UK proposals do not track the amendments made in the EU under AIFMD 2.0 that come into effect on April 16, 2026.
	
	The HM Treasury published a Consultation on Regulations for Alternative Investment Fund Managers and the FCA published a Call for Input on the future regulation of alternative fund managers. On July 14, 2026, HM Treasury and the FCA published a range of consultation papers on their proposals to reform the rules for UK asset managers.
	
	- HMT Draft regulations for Alternative Investment Fund Managers and related policy note - The HMT CP sets out a draft Statutory Instrument (SI), which is still in development. Although the policy approach is broadly settled, respondents are being asked to flag any significant technical errors or oversights that would prevent the desired outcomes from being achieved or lead to significant unintended consequences.
	- FCA CP26/28 The UK AIFM Regime - The FCA is proposing a new sourcebook, the Alternative Investment Funds sourcebook (ALTS) for managers of unauthorized funds. The aim is for most of the UK's AIFM regime to be in FCA rules rather than in legislation, meaning that, where the FCA believes it needs to change or adapt the framework, doing so will be quicker and nimbler than at present. The ALTS rules would be based on three new categories depending on the size of the firms' Net Asset Value (NAV):
	  - Small: firms with less than £750 million NAV. (This is a significant increase from the threshold of £100 million which had been proposed in the prior FCA discussions.)
	  - Medium: firms with more than £750 million NAV, but less than £5 billion.
	  - Large: firms with more than £5 billion NAV.
	- The FCA AIFM CP outlines the FCA's proposals for revised rules on many of the core regulatory requirements for AIFMs, including valuation, leverage, risk management, liquidity risk management, delegation, annual reporting, and investor disclosures. For most of these sets of rules, the application of the rules is staggered according to the category of firm as small / medium / large AIFM. The deadline for responding to the main elements of the consultation is October 22, 2026.
	- FCA CP26/26 Fund Reporting for Asset Management Entities ("FRAME") - CP 26/26 proposes a single regulatory reporting framework calibrated to the type, size, and activity of the fund. Note, the proposals for FRAME extend beyond AIFMs. To ensure

Legislation	Details
Revision of the regulatory framework for UK AIFMs Consultations MEDIUM/HIGH IMPACT	proportionality, the FCA proposes that the granularity of reporting requirements should correspond to the size of a fund. The proposal is that managers will submit a set of "essential" reporting requirements for each fund under £500 million NAV. For funds over £500 million NAV, managers will be required to submit more extensive 'enhanced' requirements in addition to reporting the "essential" information. The deadline for responding to the consultation is October 22, 2026. - FCA CP26/27 Remuneration: Solo-regulated firms' rules reform – The FCA is seeking views on proposals for a simpler, more proportionate remuneration regime for in-scope FCA solo-regulated firms. The deadline for responding to the consultation is September 16, 2026.
FCA Policy Statement on improving the UK Transaction Reporting Regime MEDIUM/HIGH IMPACT	In November 2025, the FCA published a consultation paper on the UK transaction reporting regime (CP 25/32). The FCA sought views on proposals for new rules on transaction reporting that will replace and restate retained EU law derived from MiFIR. On August 3, 2026, the FCA published its policy statement (PS26/15) setting out new transaction reporting rules that will replace and restate retained EU law derived from MiFIR. The changes aim to simplify firms' reporting obligations, reduce duplicative or low-value reporting, and improve consistency in how firms complete key fields. The FCA is proceeding with some proposals as consulted on and has made targeted adjustments and clarified points in others. The changes include: - Reducing the number of transaction reporting fields from 65 to 52 and removing reporting obligations for seven million financial instruments that are only tradeable on EU trading venues. - Removing foreign exchange derivatives from the scope of reporting requirements. This will reduce costs for more than 400 UK firms. - Reducing the default back-reporting period from five to three years. This will lower the number of transaction reports that need to be resubmitted to the FCA by a third. - Exempting most corporate actions from reporting obligations. - Requiring trading venues to populate fewer fields in their transaction reports and creating a new framework for conditional single-sided reporting. The changes to the rules, which include three new chapters in MAR, are in the Markets in Financial Instruments (Record Keeping, Transaction Reporting and Financial Instrument Reference Data) Instrument 2026 (FCA 2026/52). The new rules will come into force on April 3, 2028, although firms that are ready to make certain changes sooner can do so, as the FCA will take a flexible supervisory approach to some areas until this date. The Policy Statement should be checked for relevant detail and requirements.

Legislation	Details
FCA Policy Statement on improving the UK Transaction Reporting Regime MEDIUM/HIGH IMPACT	The FCA will publish a draft schema, validation rules and new guidelines for consultation in October 2026. It will also cover transitional provisions and consequential amendments to the Handbook. Firms that may be affected by the changes should consider whether planning is appropriate in light of their reporting obligations and operational models. This may include reviewing reporting logic, considering the potential impact of the changes to the scope of reporting requirements and data fields, and preparing for the revised schema, validation rules and guidance, where relevant. Treasury will commence the revocation of firm-facing requirements in MiFIR that pertain to transaction reporting when Parliamentary time allows. Note the UK's proposals for changes to the Transaction Reporting regime differ from those proposed by the EU. See the section "EU transaction reporting framework" for details of the EU's proposals.
Regulatory Initiatives Grid LOW IMPACT	On May 19, 2026, the Financial Services Regulatory Initiatives Forum (which includes the FCA, PRA, and His Majesty's Treasury (HMT) as members) published the tenth edition of the Regulatory Initiatives Grid (the Grid). The purpose of the Grid is to set out details of planned regulatory initiatives relevant to the financial services sector and to help firms manage the operational impact of implementing initiatives. The previous edition of the Grid was published on December 11, 2025.

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