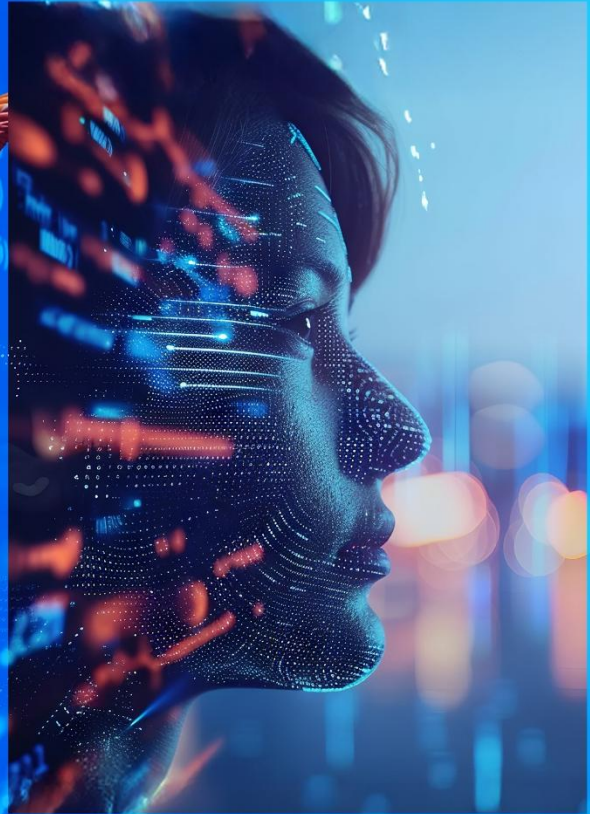




Regulatory Insights

Financial Services



APRIL 2026

Anti-Money Laundering

📄 AMLA stakeholder roundtable on risk assessment for the non-financial sector

Publication date: 15 April 2026

What: AMLA is developing a common EU methodology to assess Money Laundering and Terrorist Financing (ML/TF) risks in the non-financial sector and hosted an online stakeholder roundtable to gather early input.

Key points:

- ❑ The methodology will guide how national supervisors assess risk and set the frequency and intensity of inspections.
- ❑ AMLA sought early feedback before launching a formal consultation.
- ❑ Invitations have been limited to EU-level trade associations representing non-financial obliged entities.

Next steps:

- ❑ Roundtable date: took place on 4 May 2026 (online).
- ❑ Input will feed into AMLA's draft risk assessment methodology ahead of formal consultation.

🟡 **Medium impact:** Early opportunity for non-financial sectors to influence how AML/CFT risk will be assessed and supervised across the EU.



📄 AMLA consults on group-wide requirements and business-wide risk assessment

Publication date: 16 April 2026

What: AMLA launched [two public consultations](#) on draft rules setting out how obliged entities must identify, assess and manage Money Laundering and Terrorist Financing (ML/TF) risks under the AML Regulation (AMLR).

Key points:

- ❑ **Draft Guidelines on Business-Wide Risk Assessment (BWRA):**
 - Apply to all obliged entities across financial and non-financial sectors.
 - Set minimum expectations, with proportionality based on size, business model and risk profile.
- ❑ **Draft RTS on group-wide requirements:**
 - Establish minimum standards for group-wide AML/CFT frameworks, including cross-border groups and third-country operations.
 - Aim to ensure a consolidated view of ML/TF risk across groups.

Next steps:

- ❑ AMLA invites feedback from all stakeholders, with a particular focus on the non-financial sector.
- ❑ Public hearings:
 - [Group-wide requirements RTS](#): 20 May 2026 (10:00–12:00 CET)
 - [BWRA Guidelines](#): 28 May 2026 (10:00–12:00 CET)

🟡 **Medium impact:** Shapes future EU-wide standards for AML/CFT risk assessment and group-level controls, with broad relevance for both financial and non-financial entities.

Anti-Money Laundering (continued)

📄 **AMLA advances preparations for the 2027 selection exercise**

Publication date: 17 April 2026

What: AMLA published two updates supporting preparations for the first selection of obliged entities to fall under AMLA's direct supervision from 2028.

Key points:

❑ **Draft taxonomy for the 2027 selection exercise:**

- [Published](#) by the EBA as part of [reporting framework release 4.3](#).
- Supports the methodology to identify entities subject to AMLA's direct supervision.
- Open for comments until 10 May 2026 via the [EBA feedback form](#).

❑ **Updated template for the 2026 testing and calibration exercise:**

- Applies only to credit providers and/or entities with activities in Kosovo.
- Adds Kosovo to country coverage and credit providers to entity types.
- Both old and updated templates are accepted; no resubmission required.

Next steps:

- ❑ Stakeholders may [comment](#) on the draft taxonomy by 10 May 2026.
- ❑ Deadline for the [2026 testing and calibration data submission](#) was 22 April 2026.
- ❑ AMLA and the EBA will now use the submitted data to test and calibrate the methodology ahead of the 2027 selection exercise.

● **Medium impact:** Moves AMLA closer to identifying entities for direct supervision and provides clarity on data requirements ahead of the 2027 selection exercise.



Asset Management

📄 **CySEC sets supervisory priorities for UCITS and AIF Depositaries in 2026**

Publication date: 24 April 2026

Circular: C773

What: The Cyprus Securities and Exchange Commission (CySEC) issued circular [C773](#) highlighting the role of UCITS and AIF Depositaries (CyDEPs) and setting out its supervisory focus for 2026, including meetings and targeted thematic reviews.

Key points:

- ❑ CySEC reiterates the critical role of Depositaries in investor protection, market integrity and fund oversight.
- ❑ Depositaries' core duties include asset safekeeping/record-keeping, cash flow monitoring, and oversight checks (e.g. NAV, valuation, investment limits and leverage).
- ❑ CySEC has invited selected CyDEPs to present their depositary frameworks, including procedures, controls and governance.
- ❑ In 2026, CySEC plans targeted thematic reviews focusing on:
 - NAV calculation, asset valuation and compliance with investment and leverage limits;
 - Safekeeping and record-keeping arrangements, including delegation to sub-custodians and asset segregation throughout the custody chain.
- ❑ CyDEPs are expected to proactively review their arrangements and address any weaknesses without delay.

Next steps:

- ❑ Depositaries invited by CySEC must prepare and deliver detailed presentations covering organisation, independence, custody models, cash-flow monitoring, oversight controls, risk management and internal functions.
 - ❑ Findings from meetings and thematic work will inform CySEC's supervisory actions in 2026.
- **Medium–high impact:** Signals enhanced supervisory scrutiny of depositary activities and governance, with a strong focus on oversight quality, independence and custody arrangements.



Banking & Finance

EBA publishes list of known Data Point Model (DPM) issues to enhance reporting transparency

Publication date: 9 April 2026

What: The European Banking Authority (EBA) [announced](#) that it will begin publishing, on a regular basis, a list of known issues related to the Data Point Model (DPM) framework. The initiative is intended to enhance transparency and support reporting institutions by providing a single reference point for recurring technical issues, including available workarounds and indicative timelines for resolution.

Key points:

- ❑ The publication forms part of the EBA's broader simplification efforts to support the implementation of reporting requirements and reduce unnecessary operational burden, while safeguarding data quality and supervisory objectives.
- ❑ As an initial step, the list covers known issues affecting Pillar 3 disclosures and resolution planning reporting, which have generated a particularly high volume of queries from institutions and national competent authorities.
- ❑ For each identified issue, the EBA provides a brief description, the affected reporting outputs, an assessment of severity, the current status, any available workaround, and the expected release in which the issue is planned to be resolved
- ❑ The list will be updated regularly and gradually extended to additional reporting and disclosure modules supported by the EBA DPM framework and XBRL taxonomy, applying a phased approach to maintain the stability of the reporting framework.
- **Medium impact:** Enhances clarity and planning certainty for reporting teams, while supporting simpler reporting processes.



EBA consults on major simplification of EU supervisory reporting framework

Publication date: 10 April 2026

What: EBA launched a public consultation on a package of measures to significantly simplify EU supervisory reporting, proposing [revisions](#) to the Implementing Technical Standards (ITS) on supervisory reporting and supervisory benchmarking.

Key points:

- ❑ The proposals aim to substantially reduce reporting burden for EU banks while preserving the quality and relevance of supervisory data.
- ❑ The EBA estimates a reduction of approximately 50% in EU-harmonised reporting data points, despite the addition of new requirements related to IFRS 18, ESG and the Fundamental Review of the Trading Book (FRTB).
- ❑ Proportionality would be strengthened, particularly for Small and Non-Complex Institutions (SNCIs), including through a “core plus supplement” reporting approach.
- ❑ EU-wide stress test and supervisory benchmarking data collections would be integrated into regular supervisory reporting to reduce overlap and improve consistency.
- ❑ The revised framework is expected to apply from September 2027, with implementation supported through stakeholder engagement.

Banking & Finance (continued)

Key dates:

❑ Consultation deadline:

- 10 July 2026 ([general supervisory reporting and benchmarking](#))
- 10 May 2026 (IFRS 18-related FINREP changes)

❑ Public hearings:

- Supervisory reporting ITS: 5 May 2026
- Supervisory benchmarking ITS: 24 June 2026

❑ Workshop:

- [“Efficient reporting: simpler, smarter, proportionate”](#) – 4 June 2026

● **Medium to high impact:** Signals a significant move towards simpler and more proportionate supervisory reporting.

📄 **EBA publishes decision harmonising SEPA reporting by national authorities**

Publication date: 10 April 2026

What: EBA published a [Decision](#) harmonising how National Competent Authorities (NCAs) report data under the SEPA Regulation. The Decision streamlines the transmission of SEPA-related data from NCAs to the EBA and the European Commission and complements the existing Commission Implementing Regulation applicable to Payment Service Providers (PSPs).

Key points:

- ❑ The Decision introduces a single reporting channel via the EBA, reducing administrative burden on NCAs and ensuring consistent, high-quality data for both the EBA and the European Commission.
- ❑ It covers data reported by PSPs on charges for credit transfers, instant credit transfers and payment accounts, as well as the share of transactions rejected due to EU sanctions.
- ❑ NCAs will now report the relevant information only to the EBA, which will

then transmit it to the European Commission.

- ❑ Where NCAs already hold the required data, they are responsible for ensuring its accuracy and completeness, without re-requesting information from PSPs.
- ❑ The Decision also amends the Annex to the EBA’s EUCLID Decision to reflect the new reporting requirement.
- ❑ The Decision takes effect immediately.
- **Medium impact:** Simplifies SEPA reporting for national authorities and improves data consistency.

📄 **EBA publishes report on banks’ dry run testing of recovery plans**

Publication date: 13 April 2026

What: EBA published a [report](#) assessing how banks test the implementation of their recovery plans through so-called “dry runs”. The analysis evaluates the effectiveness of dry runs in strengthening the operationalisation of recovery plans and enhancing institutions’ preparedness for stress situations.

Key points:

- ❑ The EBA finds that dry runs, when used meaningfully, are an effective tool to improve crisis readiness and institutions’ ability to respond to stress in a timely and credible manner.
- ❑ Most institutions recognise the value of dry runs and use lessons learned to improve recovery planning; however, approaches and levels of maturity vary significantly across banks.
- ❑ Where dry runs are carried out mainly to meet supervisory expectations, they tend to be less effective and resemble compliance-driven exercises with limited follow-up.

Banking & Finance (continued)

- ❑ More advanced institutions use dry runs as genuine management tools, embedding recovery planning into their broader risk management framework and strengthening the credibility and feasibility of recovery plans.
- ❑ The EBA highlights the importance of regular, high-quality testing of recovery plan elements and points to the benefits of stronger integration between recovery and resolution testing activities.

● **Medium impact:** Reinforces supervisory expectations on the effective testing and usability of recovery plans, with increased focus on meaningful dry runs as part of banks' crisis preparedness.

EBA seeks feedback on draft technical package 4.3 of its reporting framework

Publication date: 16 April 2026

What: EBA published a draft technical package for version 4.3 of its reporting framework, covering Anti-Money Laundering (AML) and Third-Country Branches (TCB) reporting. The early release is intended to support institutions in preparing for upcoming changes ahead of the final publication scheduled for June 2026.

Key points:

- ❑ The draft package includes validation rules, the Data Point Model (DPM) and XBRL taxonomies, together with a new glossary.
- ❑ It introduces new reporting requirements under the ITS on supervisory reporting of third-country branches, in accordance with the CRD, with a first reference date of 31 March 2027.
- ❑ The package also supports the methodology for identifying entities subject to direct supervision by AMLA, with a first reference date of 31 December 2026, and should be read

alongside the AMLA templates and instructions for the testing and calibration exercise.

- ❑ The early publication aims to provide additional implementation time and enable the EBA to collect stakeholder feedback ahead of finalisation.

Next steps and deadlines:

- ❑ Stakeholders are invited to submit comments on the draft technical package and glossary by 10 May 2026, using the [EBA feedback form](#).
- ❑ The final technical package for Reporting Framework 4.3 will be published in June 2026, incorporating feedback received.

● **Medium impact:** Allows early preparation for forthcoming AML and third-country branch reporting requirements and signals upcoming changes to the EBA reporting framework.



EBA responds to European Commission consultation on EU banking competitiveness

Publication date: 17 April 2026

What: EBA published its [response](#) to the European Commission's consultation on strengthening the competitiveness of the EU banking sector. The response draws on the EBA's analytical work and its October 2025 Task Force on Efficiency (TFE) report, focusing on competitiveness, regulatory complexity and completion of the Single Market.

Key points:

- ❑ The EBA confirms the resilience of EU banks following post-financial crisis reforms, while noting ongoing challenges from geopolitical risks, exposures to non-bank financial institutions and digital transformation.
- ❑ Competitiveness should be supported through targeted simplification of the regulatory and supervisory framework, without undermining financial stability.
- ❑ The EBA stresses the importance of completing the Single Market for financial services and deepening the Banking Union to enable banks to fully benefit from scale and cross-border integration.
- ❑ Simplification efforts should remain aligned with Basel III, preserve an EU-level playing field and avoid fragmentation of the Single Rulebook.
- ❑ The response builds on the TFE report's 21 recommendations, including reducing reporting burden, strengthening proportionality and streamlining supervisory processes.

Next steps and outlook:

- The EBA will continue working with the European Commission to feed into its report on EU banking competitiveness.
- Follow-up work is ongoing across reporting simplification, supervisory convergence and

proportionality measures, particularly for small and non-complex institutions.

- **Medium impact:** Signals continued policy focus on simplifying the EU banking framework and completing the Single Market, while maintaining prudential standards and regulatory consistency.



EBA responds to Commission amendments to draft RTS on operational risk

Publication date: 23 April 2026

What:

The EBA published an [Opinion](#) on the European Commission's (Commission) proposed amendments to the final draft Regulatory Technical Standards (RTS) on operational risk under the Capital Requirements Regulation (CRR). The EBA raises concerns that certain changes could undermine the consistency and supervisory effectiveness of the operational risk capital framework

Key points:

- ❑ The Commission proposes allowing institutions to combine the Accounting Approach (AA) and the Prudential Boundary Approach (PBA) when calculating the financial component of the business indicator.

Banking & Finance (continued)

- ❑ The EBA considers that applying only one approach to the full balance sheet is necessary to preserve coherence, transparency and alignment with the Basel standard. The EBA warns that combining approaches could increase complexity, create inconsistencies across risk frameworks and enable regulatory arbitrage, benefiting only a limited number of institutions.
- ❑ The Commission also proposes limiting notification obligations to competent authorities to material changes in the scope of the PBA.
- ❑ The EBA considers this could weaken supervisory effectiveness by introducing institution-specific materiality assessments, complicating supervisory reviews.
- ❑ The EBA supports other proposed amendments that improve legal clarity and readability of the RTS.

Next steps and outlook:

- ❑ The Opinion was issued under Article 10(1) of Regulation (EU) No 1093/2010, following the Commission's intention to endorse the RTS with amendments.
- ❑ The EBA invites the Commission to reconsider the two contested amendments ahead of final adoption of the RTS.
- **Medium impact:** Highlights potential divergence from the Basel operational risk framework and signals supervisory concerns over increased complexity and reduced consistency in operational risk capital requirements.

EBA consults on revised limits for exposures to shadow banking entities

Publication date: 9 April 2026

What: EBA launched a public [consultation](#) on revised Guidelines on limits on exposures to shadow banking entities carrying out banking-like activities outside

the regulated framework, under the Capital Requirements Regulation (CRR).

Key points:

- ❑ The revised Guidelines align with the updated EU large-exposure reporting framework and the RTS identifying shadow banking entities, effective since January 2024.
- ❑ The basis for exposure limits is updated from eligible capital to Tier 1 capital.
- ❑ Existing governance requirements and the primary and fallback methods for setting limits are maintained.
- ❑ The 0.25% materiality threshold is removed to simplify the framework.
- ❑ The EBA is seeking feedback on implementation impacts, current market practices, and the effect of quantitative limits on lending to shadow banking entities.

Next steps and outlook:

- ❑ Consultation deadline: 9 July 2026 (23:59 CEST).
- ❑ Public hearing: 25 June 2026 (10:00–12:00 CEST).
- ❑ Feedback will inform the final Guidelines and broader EBA policy work, feeding into reports to the Commission due by December 2027.
- **Medium impact:** Updates prudential expectations for managing and limiting exposures to shadow banking entities, with implications for capital planning, governance and large-exposure monitoring.

Banking & Finance (continued)

EBA streamlines its Guidelines on connected clients to align with new EU legislation

Publication date: 29 April 2026

What: EBA partially deleted sections of its Guidelines on connected clients following the entry into force of new directly applicable EU legislation, ensuring continued alignment and consistency in the identification of groups of connected clients by credit institutions.

Key points:

- ❑ The changes reflect the application of Commission Delegated Regulation (EU) 2024/1728, which sets binding regulatory technical standards on connected clients.
- ❑ As the new rules apply directly across the EU, certain guideline provisions were deemed redundant and removed.
- ❑ The objective is to maintain clarity and consistency in the connected-client framework.
- ❑ The consolidated version of the Guidelines can be found [here](#).
- **Low to medium impact:** Primarily a streamlining exercise, with limited operational impact as binding RTS now govern key aspects of connected-client identification.

EBA publishes its final Guidelines on supervisory independence

Publication date: 29 April 2026

What: EBA published its final [Guidelines on Supervisory Independence](#) under the Capital Requirements Directive (CRD), clarifying how competent authorities should prevent and manage conflicts of interest involving both staff and members of governance bodies.

Key points:

- ❑ The Guidelines strengthen the framework for managing conflicts of interest, including declarations of interest, restrictions on trading in financial instruments and cooling-off periods.

- ❑ They introduce harmonised minimum standards for the submission and assessment of declarations of interest on a pre-employment, annual and ad-hoc basis.
- ❑ The Guidelines clarify expectations regarding the appointment, tenure and independence of members of governance bodies.
- ❑ They further specify procedural requirements for the sale or disposal of financial instruments and the CRD's prohibition on certain trading activities.
- ❑ Where national law allows for longer cooling-off periods, the Guidelines promote a proportionate and consistent EU-wide approach.
- **Medium impact:** Enhances governance and supervisory independence requirements for competent authorities, with implications for internal procedures, staff conduct rules and governance arrangements.

Banking union: CMDI legislative package published in the Official Journal

Publication date: April 2026

What: A legislative package amending the EU framework for bank Crisis Management and Deposit Insurance (CMDI) has been published in the Official Journal, strengthening the rules on bank recovery, resolution and deposit protection.

Key points:

- ❑ The package includes:
 - ❖ [Directive \(EU\) 2026/806 \(BRRD3\)](#), amending the Bank Recovery and Resolution Directive on early intervention, resolution conditions and resolution financing.
 - ❖ [Regulation \(EU\) 2026/808 \(SRMR3\)](#), amending the Single Resolution Mechanism Regulation on early intervention, resolution conditions and funding.

Banking & Finance *(continued)*

- ❖ **Directive (EU) 2026/804 (DGSD2)**, amending the Deposit Guarantee Schemes Directive, including the scope of deposit protection, use of DGS funds, cross-border cooperation and transparency.
- The reforms aim to enhance the effectiveness and consistency of the EU crisis management and deposit insurance framework.

Timing:

- ✓ **Entry into force:** 10 May 2026
- ✓ **Application:** from 11 May 2028
- **High impact:** Introduces significant changes to the EU bank resolution and deposit guarantee framework, with substantial implications for banks, resolution authorities and deposit guarantee schemes across the Banking Union.



Payment Services

📰 EU Council publishes final compromise texts for PSD3 and PSR

Publication date: April 2026

What: The EU Council published the final compromise texts for the proposed [Payment Services Directive \(PSD3\)](#) and [Payment Services Regulation \(PSR\)](#), reflecting the provisional political agreement reached with the European Parliament on 27 November 2025.

Key points:

- ❑ The PSD3/PSR package aims to:
 - ✓ combat and mitigate payment fraud;
 - ✓ strengthen consumer rights;
 - ✓ further level the playing field between banks and non-bank payment service providers;
 - ✓ improve the functioning of open banking;
 - ✓ strengthen access to cash across the EU, including in-store and ATM withdrawals; and
 - ✓ strengthen harmonisation and enforcement across the EU.
- ❑ The texts were published alongside a note from the Council's General Secretariat recommending approval by the Committee of the Permanent Representatives (COREPER), ahead of second-reading agreement with the European Parliament.

Next steps:

Both texts must be formally approved by the European Parliament and the Council before publication in the Official Journal.

● **High impact:** Introduces wide-ranging reforms to the EU payments framework, with significant implications for banks, payment institutions, fintechs and consumer protection across the EU.



📄 **ESAs' Joint Committee sets out 2025 priorities on digitalisation, cyber resilience and sustainable finance**

Publication date: 24 April 2026

What: The Joint Committee of the European Supervisory Authorities (EBA, EIOPA and ESMA) published its [Annual Report for 2025](#), outlining key priorities, activities and achievements of its cross-sectoral work, with a strong focus on digitalisation, cyber resilience and sustainable finance.

Key points:

- ❑ The Joint Committee prioritised consumer protection in increasingly digital financial markets, including risks linked to digital distribution channels and financial innovation.
- ❑ Significant efforts were devoted to strengthening operational and cyber resilience, notably through coordination on the implementation of the Digital Operational Resilience Act (DORA).
- ❑ The ESAs worked to improve the effectiveness and consistency of sustainable finance disclosures, aligning with broader EU sustainability objectives.
- ❑ Cross-sectoral risk monitoring was enhanced, particularly in light of geopolitical uncertainty, rapid digitalisation and financial innovation.
- ❑ Additional initiatives included work on the EU securitisation framework, progress on the European Single Access Point (ESAP) and support for innovation via the European Forum for Innovation Facilitators (EFIF).
- ❑ In line with the European Commission priorities, the Joint Committee contributed to efforts to simplify the EU financial regulatory framework, especially in sustainable finance and PRIIPs.

Next steps and outlook:

- ❑ The Joint Committee will continue to act as a coordination platform for

risk analysis.

- ❑ Future work will focus on maintaining robust and proportionate regulation amid accelerating digital and technological change.

● **Medium impact:** Confirms that supervisors will continue to prioritise digital, cyber and sustainability risks, with tangible implications for firms' governance, operational resilience (including DORA implementation), compliance controls and sustainability reporting obligations.

📄 **ESMA clarifies expectations ahead of the EU Consolidated Tapes go-live**

Publication date: 1 April 2026

What: ESMA published [Q&As](#) on the onboarding of data contributors and the operational rules for EU Consolidated Tape Providers (CTPs), to increase certainty ahead of the launch of the bond and equity Consolidated Tapes (CT).

Key points:

- ❑ Trading venues and Authorised Publication Arrangements (APAs) have a legal obligation to contribute data from the CTs' go-live.
- ❑ ESMA expects data contributors to engage early with the selected CTPs, even before formal authorisation, to ensure operational readiness.
- ❑ Preparatory work may include agreeing data transmission protocols and carrying out connectivity and end-to-end testing. Selected CTPs are expected to put in place measures to safeguard confidentiality and data integrity during this preparatory phase.

Next steps and outlook:

- ❑ fairCT (bonds CT) and EuroCTP (equities CT) are progressing through their authorisation processes. The derivatives CT provider selection, launched in January 2026, is expected to conclude by July 2026.

Securities & Markets *(continued)*

● **Medium impact:** Confirms a day-one reporting obligation and sets clear supervisory expectations for early technical onboarding with Consolidated Tape Providers.

📄 **ESMA releases reporting templates and instructions for the Active Account Requirement**

Publication date: 13 April 2026

What: ESMA published the reporting [templates and instructions](#) for the Active Account Requirement (AAR) under EMIR 3, setting out how in-scope entities must report AAR information to their competent authorities.

Key points:

- ❑ The templates specify in detail the data and information entities subject to the AAR must report.
- ❑ ESMA aims to ensure a harmonised and efficient reporting framework across the EU.
- ❑ Standardised templates and clear instructions are intended to support consistent supervisory practices among national authorities.

Next steps and outlook:

- ❑ First AAR report due: 31 July 2026, covering the period from 25 June 2025 (AAR applicability date) to 30 June 2026.
 - ❑ Reporting will thereafter be semi-annual, with submissions due 31 January and 31 July each year, each covering a 12-month reference period.
- **Medium impact:** Provides clarity on how and when AAR reporting must be completed, enabling firms to prepare systems and processes ahead of the first submission.

📄 **ESMA supports ESEF implementation with updated taxonomy**

Publication date: 21 April 2026

What: ESMA published the [2025 ESEF XBRL taxonomy files](#) and an [updated ESEF Conformance Suite](#). These tools help listed companies (issuers) and software providers prepare 2026 IFRS consolidated financial statements in the correct European Single Electronic Format (ESEF).

- ❑ *ESEF is the EU-wide standard requiring listed companies to publish their annual financial reports in a machine-readable electronic format (using XBRL).*
- ❑ *It allows regulators, investors and analysts to easily compare and analyse financial statements across companies and countries.*
- ❑ *The taxonomy acts like a dictionary of financial reporting tags, ensuring that the same financial concepts are labelled consistently.*

Key points:

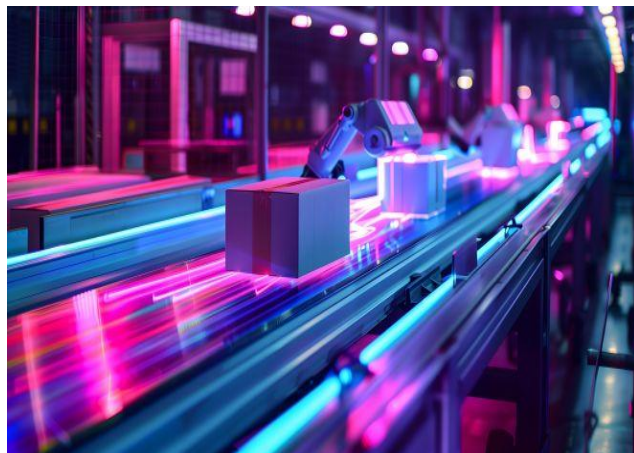
- ❑ The 2025 ESEF taxonomy reflects IFRS 18, Presentation and Disclosure in Financial Statements, effective from 1 January 2027 (with early application allowed).
- ❑ The taxonomy includes two entry points, allowing issuers to report using:
 - the existing [IAS 1](#) structure, or
 - the new [IFRS 18](#) structure.
- ❑ This dual approach helps firms familiarise themselves early with IFRS 18 and reduce implementation risk.
- ❑ ESMA confirmed it will not amend the ESEF RTS or taxonomy in 2026, providing regulatory stability.
- ❑ This follows the IFRS Foundation's decision not to issue a 2026 IFRS Accounting Taxonomy update.

Securities & Markets (continued)

Next steps and outlook:

- ❑ Issuers and software vendors are encouraged to consult IFRS Foundation guidance when preparing 2026 reports using the 2025 taxonomy.

● **Medium impact:** Supports smoother transition to IFRS 18 and gives firms clarity and stability when preparing electronic financial reports under ESEF.



📄 Commission publishes draft RTS on order execution policies under MiFID II

Publication date: 14 April 2026

What: The European Commission published a [draft Delegated Regulation supplementing MiFID II with Regulatory Technical Standards \(RTS\)](#) on the criteria for establishing and assessing the effectiveness of investment firms' order execution policies. The draft repeals Delegated Regulations (EU) 2017/575 and 2017/576.

Key points:

- ❑ The draft RTS are based on technical standards developed by ESMA, following empowerment under Directive (EU) 2024/7903 amending MiFID II.
- ❑ The RTS set detailed requirements on how investment firms must design, apply and review their order execution policies to achieve best execution for clients.
- ❑ The rules cover, in particular:
 - Selection of execution venues, to

consistently deliver the best possible result for clients.

- Monitoring of execution policies, including the data firms must use to assess execution quality.
- Order routing practices, aimed at avoiding adverse impacts on execution outcomes.
- Handling client-specific instructions, with safeguards to prevent negative effects on investor protection.
- Periodic assessment of the effectiveness of order execution policies.
- Identification of classes of financial instruments, ensuring execution quality is assessed across comparable product groups.

Next steps and outlook:

- ❑ Following adoption, the RTS will replace the existing MiFID II delegated acts on execution quality reporting and order execution.
- ❑ Investment firms will need to review and update their order execution frameworks, governance and monitoring processes to ensure compliance.

● **Medium impact:** Reinforces and modernises best-execution expectations, with practical implications for execution venue selection, data use, policy monitoring and investor protection.

📄 Commission adopts RTS on completion guarantees for residential property under construction

Publication date: 16 April 2026

What: The European Commission adopted a [draft Delegated Regulation supplementing the Capital Requirements Regulation \(CRR\)](#) with Regulatory Technical Standards (RTS) specifying when a legal mechanism can be considered equivalent for ensuring that a residential property under construction is completed within a reasonable timeframe.

Securities & Markets (continued)

Key points:

- ❑ The RTS clarify the conditions under which legal protections (e.g. guarantees or comparable mechanisms) can be treated as equivalent for prudential purposes under Article 124(3)(a)(iii)(2) CRR.
- ❑ The draft is based on RTS developed by the EBA, taking into account the EBA's [opinion](#) issued on 26 February 2026 following Commission amendments.
- ❑ The framework supports consistent risk-weighting and prudential treatment of exposures related to residential properties under construction.

Next steps:

- ❑ The Delegated Regulation is subject to scrutiny by the European Parliament and the Council.
 - ❑ If no objections are raised, it will be published in the Official Journal and enter into force 20 days after publication.
- **Medium impact:** Provides legal certainty on prudential treatment of construction-phase residential property exposures, with implications for banks' capital calculations and risk management.

Commission adopts Delegated Regulations on disclosures and trading under MAR

Publication date: 8 April 2026

What: The European Commission adopted two Delegated Regulations under the Market Abuse Regulation (MAR) to implement amendments introduced by the EU Listing Act (Regulation (EU) 2024/2809). The measures update the rules on inside information disclosure and trading by Persons Discharging Managerial Responsibilities (PDMRs).

Key points:

[Delegated Regulation on disclosures \(MAR Article 17\):](#)

- ❑ Exempts intermediate steps in lengthy processes from mandatory disclosure, provided confidentiality is maintained.
- ❑ Clarifies the conditions for delaying disclosure of inside information.
- ❑ Establishes non-exhaustive lists of:
 - final events or circumstances that trigger disclosure and their timing; and
 - situations where delayed disclosure would conflict with the issuer's most recent public communication on the same matter.

[Delegated Regulation on trading \(amending Delegated Regulation \(EU\) 2016/522\):](#)

- ❑ Broadens exemptions allowing PDMRs to trade during closed periods under Article 19(12) MAR.
- ❑ Establishes a list of designated trading venues with a significant cross-border dimension for the order-data exchange mechanism under Article 25a MAR (shares).
- ❑ Updates the indicators of market manipulation to reflect technical developments such as algorithmic trading, and corrects technical references.

Next steps and outlook:

- ❑ The disclosure Delegated Regulation will enter into force three days after publication in the Official Journal.
 - ❑ The trading Delegated Regulation will enter into force 20 days after publication in the Official Journal.
 - ❑ Issuers and market participants will need to update disclosure policies, delay procedures and PDMR dealing frameworks accordingly.
- **Medium impact:** Clarifies and modernises MAR disclosure and trading rules, reducing uncertainty for issuers while strengthening investor protection and market integrity.

Securities & Markets (continued)

ESMA launches a call for evidence on the structure of European equity markets

Publication date: 30 April 2026


What: ESMA launched a [call for evidence](#) (CfE) analysing changes in European equity market trading between 2022 and 2025, based on MiFIR transaction data, and is seeking stakeholder feedback on observed trends and potential regulatory implications.

Key points:

- ❑ European equity markets continue to function well overall, with addressable liquidity stable at ~85% of total trading volume.
- ❑ On-book trading remained broadly stable at 75–80% of volume.
- ❑ Lit (i.e. pre-trade transparent) continuous trading declined, offset by increased use of closing auctions, frequent batch auctions and SI trading.
- ❑ ESMA seeks views on addressable liquidity and its treatment under RTS 1, including post-trade transparency flagging.
- ❑ ESMA also announced the repeal of the Q&A on periodic auctions and tick-size rules.

Next steps:

Stakeholders may respond by 30 June 2026. ESMA will publish a feedback statement in the second half of 2026.

 **Medium impact:** May inform future adjustments to equity market transparency and trading-venue rules under MiFIR.

ESMA launches its sixth stress test exercise for Central Counterparties (CCPs)

Publication date: 30 April 2026

What: ESMA launched its [sixth EU-wide stress test](#) for Central Counterparties (CCPs) under EMIR, assessing their resilience to severe market stress using an adverse


scenario provided by the ESRB.

Key points:

- ❑ The exercise covers 16 CCPs, including all authorised EU CCPs and two UK Tier 2 CCPs.
- ❑ It assesses CCPs' ability to absorb losses from market shocks and multiple clearing member defaults.
- ❑ For the first time, the framework includes a Recovery and Resolution component, analysing the aggregate impact of CCP recovery and resolution tools on financial stability.
- ❑ The framework also covers credit stress testing, concentration risk and reverse stress testing.

Next steps:

Data collection begins in May 2026, with results expected to be published in Q1 2027.

 **Medium impact:** Strengthens supervisory scrutiny of CCP resilience and recovery arrangements, with implications for clearing members and EU financial stability.

ESMA consults on guidelines on endorsement under the ESG Ratings Regulation

Publication date: 29 April 2026

What: ESMA launched a public [consultation](#) on draft guidelines concerning the endorsement of non-EU ESG ratings under the ESG Ratings Regulation. The consultation aims to gather feedback from ESG rating providers and other stakeholders on ESMA's proposed approach and requirements for endorsement.

Key points:

- ❑ The draft guidelines set out ESMA's approach to the endorsement of ESG ratings issued outside the EU by ESG Rating Providers established within the Union.
- ❑ They aim to promote a consistent and harmonised application of the endorsement regime across the EU.
- ❑ The guidelines clarify the information and documentation to be submitted as part of an application to endorse ESG ratings.
- ❑ ESMA seeks to ensure that the guidance is clear, proportionate and workable in practice, while remaining aligned with the objectives of the ESG Ratings Regulation.
- ❑ The initiative supports market integrity and investor protection within the EU ESG ratings framework.


Background:

The ESG Ratings Regulation establishes a regulatory framework for ESG rating providers operating in the EU, including rules governing the endorsement of non-EU ESG ratings by EU-established providers. The draft guidelines are intended to support the implementation of these endorsement provisions.

Next steps and outlook:

- ❑ ESMA invites comments on the consultation paper until **29 May 2026**.
- ❑ Feedback received will be assessed and considered in the finalisation of the guidelines.

- ❑ ESMA plans to communicate further information on the outcome of the consultation and the adoption of the final guidelines before the **end of July 2026**.

 **Medium impact:** Introduces additional supervisory expectations and clarity for ESG rating providers endorsing non-EU ratings, with implications for compliance processes, documentation requirements and cross-border ESG ratings activities.

EU Commission adopts RTS on ESG rating activities and disclosure of ESG rating products

Publication date: April 2026

What: The European Commission adopted two Delegated Regulations setting out Regulatory Technical Standards (RTS) under the ESG Rating Regulation (EU) 2024/3005, establishing requirements on the organisation of ESG rating activities and the disclosure of ESG rating products.

Key points:

- ❑ [The first RTS](#) sets out measures and safeguards to ensure the separation of ESG rating activities from other business activities, including:
 - ✓ separate organisational structures and working environments;
 - ✓ regular self-declarations by staff confirming non-involvement in conflicting activities;
 - ✓ additional controls for ESG rating providers offering investment services or insurance activities; and
 - ✓ specific safeguards for providers that offer, or intend to offer, benchmarks, including requirements on employee remuneration, independence of ESG ratings, and documented conflict-of-interest assessments.

Sustainability (continued)

□ [The second RTS](#) specifies public and user disclosure requirements for ESG rating products, including:

- ✓ the form and content of disclosures;
- ✓ information on rating methodologies and their limitations;
- ✓ organisational arrangements of ESG rating providers; and
- ✓ procedures for data and methodology revisions.

Timing:

The Delegated Regulations will enter into force 20 days after publication in the Official Journal.

● **Medium impact:** Introduces binding governance and transparency requirements for ESG rating providers, with compliance implications for organisational structures, conflict-of-interest management and disclosure practices.

📄 EU Commission adopts Delegated Regulations on ESMA fees, fines and penalty payments for ESG rating providers

Publication date: April 2026

What: The European Commission adopted two Delegated Regulations supplementing the ESG Rating Regulation with rules on the fees, fines and periodic penalty payments that the European Securities and Markets Authority (ESMA) may impose on ESG rating providers.

Key points:

□ [The first Delegated Regulation](#) sets out the fees payable to ESMA, including:

- ✓ the types and amounts of fees;
- ✓ the matters for which fees are due and their justification;
- ✓ payment arrangements; and
- ✓ where applicable, reimbursement of costs incurred by competent authorities when carrying out tasks under the ESG Rating Regulation.

□ [The second Delegated Regulation](#)

establishes the framework for fines and periodic penalty payments, including:

- ✓ rights of defence;
- ✓ temporal provisions;
- ✓ rules on the collection and enforcement of penalties; and
- ✓ limitation periods for the imposition and enforcement of fines and penalty payments.

Timing:

□ The fees Delegated Regulation will enter into force the day following publication in the Official Journal.

□ The fines and penalty payments Delegated Regulation will enter into force 20 days after publication in the Official Journal.

● **Medium impact:** Introduces enforceable supervisory and financial consequences for ESG rating providers, with implications for compliance costs, governance and supervisory accountability.



Glossary

AIF Alternative Investment Fund (EU)

AIFMD Directive 2011/61/EU on Alternative Investment Fund Managers

AIFMs Alternative Investment Fund Managers

AML/CFT Anti-Money Laundering/Countering the Financing of Terrorism

CRD Capital Requirements Directive

CSRD Corporate Sustainability Reporting Directive

CySEC Cyprus Securities and Exchange Commission

EBA European Banking Authority

ECB European Central Bank

EIOPA European Insurance & Occupational Pensions Authority

EFAMA European Fund and Asset Management Association

ESG environmental, social, and governance

EMIR European Market Infrastructure Regulation

ESAs European Supervisory Authorities (EBA, EIOPA and ESMA)

ESMA European Securities and Markets Authority

ESRB European Systemic Risk Board EU European Union

FATF Financial Action Task Force

ICT Information and Communication Technology

INTERPOL International Criminal Police Organisation

IOSCO International Organisation of Securities Commissions

MiCA Regulation of the European Parliament and of the Council on markets in crypto-assets

MiFID Markets in Financial Instruments Directive

NCA National Competent Authority

OECD Organisation for Economic Co-operation and Development

OJ Official Journal

RTS Regulatory Technical Standards

SFDR Sustainable Finance Disclosure Directive

UNODC United Nations Office on Drugs and Crime

UCITS Directive directive 2009/65/EC on Undertakings for Collective investments in Transferable Securities

UCITS Undertakings for Collective investments in Transferable Securities (EU)

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