AIMA Regulatory Horizon Scan - North America

			7/25 8/25 9/25 10/25 11/25 12/25	
				28
Upcoming Implementation	start	end		
Final Rules	09/20/23	07/26/29	9	
OFR Category 2: non-centrally cleared	05/06	06/30		
Form PF joint data	02/08	10/01	<< Form PF joint data	
Reg NMS: tick size, access fee and ro	09/18	11/03	<< Reg NMS: tick size, access fee and round lot definition changes	
FinCEN AML/CFT program requiremen	03/25	01/01	<< FinCEN AML/CFT program requirement changes for all in scope financial institutions	>>
FinCEN minimum AML Program requir	09/04	01/01	<< FinCEN minimum AML Program requirements for RIAs and ERAs	>>
NAIC reliance on credit ratings	08/01	01/01	<< NAIC reliance on credit ratings	>>
Reporting of securities loans	10/13	01/02	<< Reporting of securities loans	>>
Regulation S-P amendments: Larger	05/16	02/02	<< Regulation S-P amendments: Larger entities	>>
Short sale reporting	10/13	02/17	<< Short sale reporting	>>
Reg NMS: odd-lot information	09/18	05/01	<< Reg NMS: odd-lot information	>>
Names rule: Larger entities	09/20	06/11	<< Names rule: Larger entities	>>
Regulation S-P amendments: Smaller	05/16	08/02	<< Regulation S-P amendments: Smaller entities	>>
NAIC Holistic framework	08/15	08/15	<< NAIC Holistic framework	>>
Names rule: Smaller entities	09/20	12/11	<< Names rule: Smaller entities	>>
IDB treasury clearing: Optional cleari	03/31	12/31	<< IDB treasury clearing: Optional clearing period	>>
Repo clearing: Optional clearing period	03/31	06/30	<< Repo clearing: Optional clearing period	>>
OEF LRM (Large Groups): Forms N-PO	08/29	11/17	<< OEF LRM (Large Groups): Forms N-PORT and N-CEN and liquidity guidance (groups >1\$B)	>>
OEF LRM (Small Groups): Forms N-PO	09/27	05/18	<< OEF LRM (Small Groups): Forms N-PORT and N-CEN and liquidity guidance (groups <1\$B)	>>
Pending Rules with Closed Consulta	09/18/24	10/11/27	7	
FinCEN SEC AML customer identificati	07/30	01/01	FinceN Sec AML customer identification programs	>>
OSC OLTF framework adoption	09/15	09/15		
	09/15	09/15		
Click the provided links for more inform				
			e. They have been provided for indicative purposes only. Dugh 12/31/2026. Some compliance periods started earlier	
			bugh 12/31/2026. Some compliance periods started earlier haustive. Other final requirements and proposals may	
affect businesses. Do not rely on thi				

AIMA Regulatory Horizon Scan - EMEA

			7/25 8/25 9/25 10/25 11/25 12/25	1 20
			0 6 13 20 27 3 10 17 24 31 7 14 21 28 5 12 19 26 2 9 16 23 30 7 14 21	1 28
Upcoming Implementation	start	end		
Final Rules	09/20/23	07/26/29		
FCA inclusion of SOFR OIS to UK DTO	04/03	06/30		
EU Anti-Money Laundering Authority	06/19	07/01		
MiFID II review: Transposition period	03/08	09/28	<< MiFID II review: Transposition period	
ESMA: relief from MiFID II RTS 28 repo	02/13	09/29	<< ESMA: relief from MiFID II RTS 28 reporting requirements	
FCA changes to transparency regime	11/05	12/01	<< FCA changes to transparency regime for bonds and derivatives	
FCA sustainability disclosure require	11/28	12/02	<< FCA sustainability disclosure requirements: Largest firms	
UK MiFIR non-equity consolidated tape	04/04	01/01	<< UK MiFiR non-equity consolidated tape	>>
EU MiFIR non-equity consolidated tape	04/04	01/01	<< EU MiFIR non-equity consolidated tape	>>
AIFMD II/UCITS VI: Transposition period	03/26	04/16	<< AIFMD II/UCITS VI: Transposition period	>>
FRC Stewardship Code: Initial reports	06/03	04/30	<< FRC Stewardship Code: Initial reports by asset managers and service providers	>>
FRC Stewardship Code: Initial reports	06/03	05/31	<< FRC Stewardship Code: Initial reports by asset owners	>>
Listing Act Directive: Transposition pe	12/01	06/06	<< Listing Act Directive: Transposition period	>>
EMIR review omnibus directive	12/02	06/25	<< EMIR review omnibus directive	>>
CBI CP152 MiFID own funds for existi	11/27	06/26	<< CBI CP152 MiFID own funds for existing AIFMs/UCITS ManCos	>>
HMT: Short Selling Regulations 2025	01/13	06/30	<< HMT: Short Selling Regulations 2025	>>
EC Delegated Act OTC Derivatives T	06/11	09/01	<< EC Delegated Act OTC Derivatives Transparency Identifier (MiFIR Review Article 26)	>>
UK Overseas Funds Regime Temporar	10/01	12/01	<< UK Overseas Funds Regime Temporary Marketing Permissions Regime	>>
FCA sustainability disclosure require	11/28	12/02	<< FCA sustainability disclosure requirements: All except largest firms	>>
EU Anti-Money Laundering Regulation	06/19	07/10	<< EU Anti-Money Laundering Regulation ("AMLR")	>>
EU Anti-Money Laundering Directive 6	06/19	07/10	<< EU Anti-Money Laundering Directive 6 ("AMLD6"): Transposition Period	>>
<u>CS3D: Applies to companies w/ > 5,0</u>	07/05	07/26	<< CS3D: Applies to companies w/ > 5,000 employees & EUR 1.5B net turnover	>>
UK transition to T+1 securities settle	02/06	10/11	<< UK transition to T+1 securities settlement	>>
CS3D: Applies to companies w/ > 3,0	07/05	07/26	<< CS3D: Applies to companies w/ > 3,000 employees & EUR 900M net turnover	>>
<u>CS3D: Applies to companies w/ > 1,0</u>	07/05	07/26	<< CS3D: Applies to companies w/ > 1,000 employees & EUR 450M net turnover	>>
Pending Rules with Closed Consulta	09/18/24	10/11/27		
UK HM Treasury carried interest consu	07/03	05/02	UK HM Treasury carried interest consultation	>>
ESMA MIFIR RTS and ITS commodity	07/03	09/29	ESMA MIFIR RTS and ITS commodity derivatives (MiFID II Review Articles 1	
ADGM FSRA Consultation Paper No. 1	07/06	09/06	ADGM FSRA Consultation Paper No. 1 of 2025 – Periodi	
ADGM FRSA Consultation Paper No 2	07/06	10/28	ADGM FRSA Consultation Paper No 2 of 2025 - Review of Prudential Framework for Lower-Risk Firms	
DFSA CP 161 Enhancing Proportionali	07/07	09/07	DFSA CP 161 Enhancing Proportionality in Prudential R	
DFSA Consultation Paper No. 165 – Li	07/08	09/08	DFSA Consultation Paper No. 165 – Licensed Functions	
ESMA AIFMD and UCITS RTS on liquidi	07/15	08/04	ESMA AIFMD and	
IOSCO Revised Recommendations for	07/26	07/26		
FSB Report on Leverage in NBFI expe	07/31	07/31		

AIMA Regulatory Horizon Scan - EMEA (con't)

				2/25	
			0 6 13 20 27 3 10 17 24 31 7 14 21 28 5 12 19 26 2 9 16 23 30 7	14 21 28	
ESMA guidelines on liquidity manage	08/04	08/04	ESMA guidelines on liquidity management tools under AIFMD and UCITS Directive	>>	
UK Home Office Ransomware legislati	08/06	08/06	UK Home Office Ransomware legislative proposals: reducing payments to cyber criminals and increasing incident	t reporting >>	
EBA CP 2025/04 proposed RTS (AMLD	08/11	12/19	EBA CP 2025/04 proposed RTS (AMLD 40(2) and 53(10)/AMLR 28(1)/AMLAR 12(7))		
UK HMT/FCA consultation on asset m	08/25	12/14	UK HMT/FCA consultation on asset management regime	>>	
FCA CP24/30 Product information fra	09/01	09/01	FCA CP24/30 Product information framework for Consumer Composite Investments	>>	
ESMA MIFIR RTS equity transparenc	09/08	09/28	ESMA MIFIR RTS		
ESMA MIFIR RTS equity transparenc	09/08	09/28	ESMA MIFIR RTS		
ESMA MiFIR RTS and ITS consolidat	09/08	09/28	ESMA MIFIR RTS a		
ESMA MiFIR RTS 2 deferrals for bon	09/08	03/02	ESMA MiFIR RTS 2 deferrals for bonds, SFPs and structured products (MiFIR Review		
ESMA MIFIR RTS equity transparenc	09/08	03/02	ESMA MIFIR RTS equity transparency [reporting data]. MIFIR Review Article 3 - am	endments li >>	
ESMA MIFIR RTS equity transparenc	09/08	03/02	ESMA MIFIR RTS equity transparency [calculations]. MIFIR Review Article 3 - amen	dments link >>	
ESMA MIFIR RTS Reasonable Comm	09/08	06/08	ESMA MIFIR RTS Reasonable Commercial Basis (MiFIR Review Article 12)	>>	
ESMA MIFIR RTS 3 volume cap and t	09/09	09/29	ESMA MIFIR RTS 3		
ESMA MIFIR RTS and ITS - consolidate	09/28	03/02	ESMA MIFIR RTS and ITS - consolidated tape providers/ DSRPs sync	hronisation >>	
FCA CP Operational Incident and Third	10/01	10/01	FCA CP Operational Incident and Third Party Reporting	>>	
EU transition to T+1 securities settle	10/01	10/11	EU transition to T+1 securities settlement	>>	
AIFMD Arts. 16 level 2/3 for open end	10/16	10/16			
UK HMT financial services regime for	11/10	05/11	UK HMT financial services reg		
UK PRA CP7/25 Matching Adjustment	11/24	12/31	UK PRA CP7/25 M		
UK FCA CP 25/9 Further proposals on	11/24	05/24	UK FCA CP 25/9 F	urther prop >>	
EU MIFID payment for research (MiFID	12/01	12/21		aymen	
Open Consultations and Other Early	01/10/24	06/10/26			
ESMA MIFIR RTS derivatives transpa	04/12	07/12	<< ESMA		
ESMA MIFIR RTS package orders (A	04/12	07/12	<< ESMA		
ESMA MIFIR RTS derivatives CTP in	04/12	07/12	<< ESMA		
CBI CP160 on Amendments to the Fit	04/19	07/19	<< CBI CP160 0		
UK climate-related transition plan req	06/25	09/17	<< UK climate-related transition plan requirements		
UK sustainability reporting standards	06/25	09/17	<< UK sustainability reporting standards consultation		
ESMA: Simplification of transaction re	06/23	09/19	<< ESMA: Simplification of transaction reporting frameworks (MiFIR, E		
ESMA: Integrated collection of funds'	06/23	09/21	<< ESMA: Integrated collection of funds' data (AIFMD, UCITS, MMFR)		
Click the provided links for more informatio		ange The	have been provided for indicative purposes only		
			y have been provided for indicative purposes only. 2/31/2026. Some compliance periods started earlier	MA	
or will end later than this range. See FAQ. This list is not exhaustive. Other final requirements and proposals may affect					
businesses. Do not rely on this as your sole source of information.					

AIMA Regulatory Horizon Scan - APAC



Explanatory Notes

What do the colors of the bars signify?

The color scheme is based on priority and impact. See the chart to the right. These are judgments made by AIMA staff for the convenience of users, although we appreciate that users could have different views about a proposal's priority or impact on their own business.

How can I access more information about the requirements?

Most of the final rules and pending proposals in the lefthand column have a link under it in the pdf version of the AIMA Regulatory Horizon Scan. Clicking that link will take you to another AIMA website page where, for most of the items on the list, you can read a high-level summary of what is required or proposed to be required. You can also view the full timeline there, and members can access AIMA's work to date on the matter. Where relevant, this page will also contain links through which members can access a full summary of what is required, relevant multimedia content and/or implementation guidance. For some of the items, this link takes members directly to a summary of what is required. In this instance, there will be no additional information available for non-members.

Does the forecast include every proposal and every final regulatory requirement with an open compliance period?

No. This is a curated list that AIMA staff have compiled. There will be proposals that affect members which are not included in the forecast. Members are urged to use the forecasts in conjunction with other resources available to them when deciding whether they have addressed all applicable regulatory requirements.

How are the dates for pending proposals estimated?

All of the dates are ESTIMATES, often based on information from the regulators themselves. For each pending proposal, the webpage accessible via the link under the proposal's name includes a full explanation of the basis for that proposal's indicative dates.

Why do the bars start where they do and why do some of the items have two bars?

The start dates are set to the publication date on the relevant agency website and not the Federal Register, Official Journal or similar. These extra days can be used for planning even if the text is not yet officially recognized. Some of the items have two bars because some matters are due at one compliance deadline and other matters are due at a later date. These differences are reflected for clarity.

Where are international regulations (i.e., those stemming from IOSCO, FSB, etc.) placed?

Even though these are international bodies, for Horizon Scan purposes they have been placed in the EMEA section.

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Impact

•	•
High	High
High	Medium
High	Low
Medium	High
Medium	Medium
Medium	Low
Low	High
Low	Medium
Low	Low

Priority