AIMA Regulatory Horizon Scan - EMEA

			7/25 10/25 1/26 4/26 7/26 10/26	
Upcoming Implementation	start	end		
Final Rules	09/20/23	07/26/29		
EMIR review regulation	12/02	06/25		
FCA inclusion of SOFR OIS to UK DTO	04/03	06/30		
EU Anti-Money Laundering Authority	06/19	07/01		Λ
MiFID II review: Transposition period	03/08	09/28	<< MiFID II review: Transposi	
ESMA: relief from MiFID II RTS 28 repo	02/13	09/29	<< ESMA: relief from MiFID II	
FCA changes to transparency regime	11/05	12/01	<< FCA changes to transparency regime for bo	
FCA sustainability disclosure require	11/28	12/02	<< FCA sustainability disclosure requirements:	
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	
FRC Stewardship Code application da	01/01	01/01		
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	>>
CS3D: Applies to companies $w > 5,0$	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	>>
CS3D: Applies to companies $w > 1,0$	07/05	07/26	<< CS3D: Applies to companies w/ > 1,000 employees & EUR 450M net turnover	>>
Pending Rules with Closed Consulta	09/18/24	06/21/28		
ESMA private securitisation framework	06/17	06/30	ESMA private securitisation framework	
EMIR Art. 7a(3) level 2/3 due	06/22	06/22		
ESMA MiFIR RTS 2 deferrals for bon	06/30	07/21	ESMA	
ESMA MIFIR RTS and ITS commodity	06/30	09/29	ESMA MIFIR RTS and ITS -	
ESMA MIFIR RTS equity transparenc	06/30	01/01	ESMA MIFIR RTS equity transparency [reporting da	
ESMA MIFIR RTS equity transparenc	06/30	06/01	ESMA MIFIR RTS equity transparency [CTP]. MIFIR Review Article 3	
ESMA MIFIR RTS equity transparenc	06/30	09/01	ESMA MIFIR RTS equity transparency [calculations]. MIFIR Review Article 3	

AIMA Regulatory Horizon Scan - EMEA (con't)

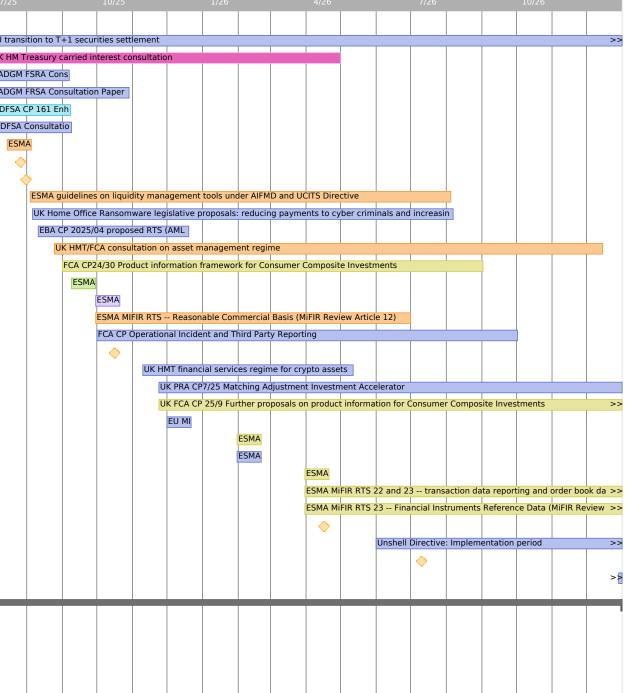
EU transition to T+1 securities settle	06/30	10/11		EU trar
UK HM Treasury carried interest consu	07/01	04/30		ИК НМ
ADGM FSRA Consultation Paper No. 1	07/06	09/06		ADGN
ADGM FRSA Consultation Paper No 2	07/06	10/28		ADGN
DFSA CP 161 Enhancing Proportionali	07/07	09/07		DFSA
DFSA Consultation Paper No. 165 - Li	07/08	09/08		DFSA
ESMA AIFMD and UCITS RTS on liquidi	07/15	08/04		ES
IOSCO Revised Recommendations for	07/26	07/26		<
FSB Report on Leverage in NBFI expe	07/31	07/31		
ESMA guidelines on liquidity manage	08/04	08/04		
UK Home Office Ransomware legislati	08/06	08/06		
EBA CP 2025/04 proposed RTS (AMLD	08/11	12/19		
UK HMT/FCA consultation on asset m	08/25	12/14		
FCA CP24/30 Product information fra	09/01	09/01		
ESMA MIFIR RTS 3 volume cap and t	09/09	09/29		
ESMA MIFIR RTS and ITS consolidat	09/30	10/20		
ESMA MIFIR RTS Reasonable Comm	09/30	06/30		
FCA CP Operational Incident and Third	10/01	10/01		
AIFMD Arts. 16 level 2/3 for open end	10/16	10/16		
UK HMT financial services regime for	11/10	05/11		
UK PRA CP7/25 Matching Adjustment	11/24	12/31		
UK FCA CP 25/9 Further proposals on	11/24	05/24		
EU MIFID payment for research (MiFID	12/01	12/21		
ESMA MIFIR ITS SI notification (MiFI	01/31	02/20		
ESMA MiFID RTS7a trading venues,	01/31	02/20		
ESMA CSRD REFIT RTS Settlement D	03/31	04/20		
ESMA MiFIR RTS 22 and 23 transact	03/31	04/20		
ESMA MiFIR RTS 23 Financial Instr	03/31	06/20		
AIFMD Arts. 23(7), 50(7), 69a(2) level	04/16	04/16		
Unshell Directive: Implementation per	06/01	06/21		
AMLR Arts. 10, 16, 17, 20, 28, 68, 69(07/10	07/10		
ESMA MiFID II RTS order execution	12/29	07/18		
Onen Consultations and Other Farly	06/02/22	01/00/27		
Open Consultations and Other Early	06/02/23	01/09/27		
EC targeted consultation on integrati	04/24		<	
FCA CP25/10 Definition of capital for	05/03		<	
ESMA EMIR 3.0 on clearing thresholds	04/17	00,23	~	

UK FCA CP25/5 Margin requirements f...

<<

06/27

03/27



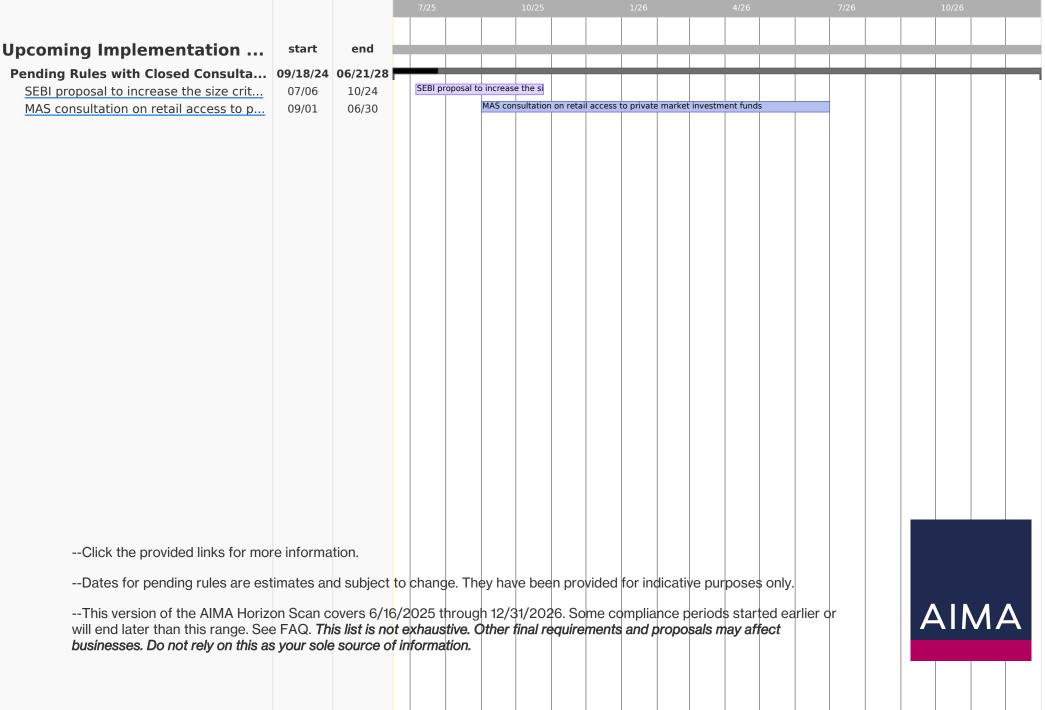
AIMA Regulatory Horizon Scan - EMEA (con't)

<< ES ESMA MIFIR RTS -- derivatives transpa... 04/12 07/12 07/12 << ES ESMA MIFIR RTS -- package orders (A... 04/12 << ES ESMA MIFIR RTS -- derivatives CTP in... 04/12 07/12 << CBI C CBI CP160 on Amendments to the Fit... 04/19 07/19 --Click the provided links for more information. --Dates for pending rules are estimates and subject to change. They have been provided for indicative purposes only. --This version of the AIMA Horizon Scan covers 6/16/2025 through 12/31/2026. Some compliance periods started earlier or will end later than this range. See FAQ. This list is not exhaustive. Other final requirements and proposals may AIMA affect businesses. Do not rely on this as your sole source of information.

AIMA Regulatory Horizon Scan - North America

Upcoming Implementation ... start end **Final Rules** 09/20/23 07/26/29 << OFR Category 2: non-centrally cleared... 05/06 06/30 << Form PF joint data Form PF joint data 02/08 10/01 << Reg NMS: tick size, access fee and Reg NMS: tick size, access fee and ro... 09/18 11/03 << FinCEN AML/CFT program requirement changes for FinCEN AML/CFT program requiremen... 03/25 01/01 << FinCEN minimum AML Program requirements for RIA FinCEN minimum AML Program requir... 09/04 01/01 << NAIC reliance on credit ratings NAIC reliance on credit ratings 08/01 01/01 << Reporting of securities loans 01/02 Reporting of securities loans 10/13 << Regulation S-P amendments: Larger entities 02/02 Regulation S-P amendments: Larger ... 05/16 << Short sale reporting Short sale reporting 10/13 02/17 << Reg NMS: odd-lot information Reg NMS: odd-lot information 09/18 05/01 << Names rule: Larger entities Names rule: Larger entities 09/20 06/11 << Regulation S-P amendments: Smaller entities Regulation S-P amendments: Smaller ... 08/02 05/16 << NAIC Holistic framework 08/15 NAIC Holistic framework 08/15 << Names rule: Smaller entities Names rule: Smaller entities 09/20 12/11 << IDB treasury clearing: Optional clearing period 12/31 IDB treasury clearing: Optional cleari... 03/31 << Repo clearing: Optional clearing period Repo clearing: Optional clearing period 03/31 06/30 >> << OEF LRM (Large Groups): Forms N-PORT and N-CEN and liquidity guidance (groups >1\$B) OEF LRM (Large Groups): Forms N-PO... 08/29 11/17<< OEF LRM (Small Groups): Forms N-PORT and N-CEN and liquidity guidance (groups <1\$B) OEF LRM (Small Groups): Forms N-PO ... 09/27 05/18 Pending Rules with Closed Consulta... 09/18/24 06/21/28 inCEN SEC AML customer identification programs FinCEN SEC AML customer identificati... 06/30 01/01 OSC OLTF framework adoption 09/15 09/15 --Click the provided links for more information. --Dates for pending rules are estimates and subject to change. They have been provided for indicative purposes only. --This version of the AIMA Horizon Scan covers 6/16/2025 through 12/31/2026. Some compliance periods started earlier or AIMA 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.

© The Alternative Investment Management Association, 2024, 2025



Impact

High	High		
High	Medium		
High	Low		
Medium	High		
Medium	Medium		
Medium	Low		
Low	High Medium		
Low			
Low	Low		
	High High Medium Medium Low Low		

Priority