

A&O SHEARMAN



Regulatory monitoring: EU Version

NEWSLETTER

APRIL 2026

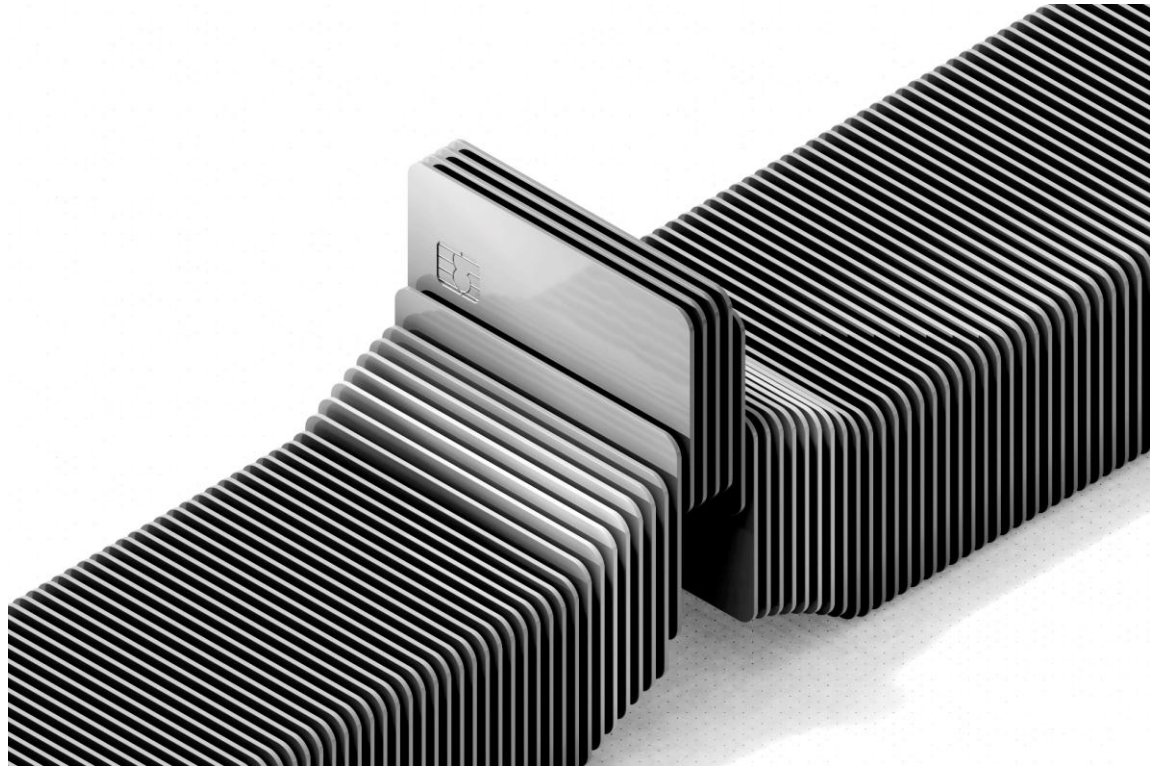
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FEATURES

HORIZON SCANNING/REGULATORY MONITORING

Identify new regulatory developments easily and tailored to the specific type of regulated firm, so that only relevant changes appear.

FINANCIAL REGULATORY LAW SOURCEBOOK

A categorised collection of all laws in the field of financial regulatory law for Europe and Germany (constantly being expanded), which can be compiled as an obligation register and commented on as desired.

IMPLEMENTATION MANAGEMENT

Effective implementation (including tailored impact analysis and gap analysis) of new legislation and agile control using our project management tool (including KPIs).

CHANGE ANALYSIS AND PREVIEW OF RULES

Read the future versions of a law early, including the official explanatory memorandum, and identify any legislative changes.

1. Bank regulation

1.1 PRUDENTIAL REGULATION

a) General

(i) EU

EBA: Decision concerning the partial deletion of Guidelines on connected clients

Status: Final

The EBA published its decision confirming it has streamlined its Guidelines on connected clients (as defined under the CRR) by partially deleting certain sections following the entry into force of [Commission Delegated Regulation \(EU\) 2024/1728](#). This Delegated Regulation introduces binding regulatory technical standards specifying when institutions must identify groups of connected clients, rendering some existing Guideline provisions redundant. As a result, the EBA has removed those elements of the Guidelines that are no longer necessary. The decision is accompanied by a [consolidated version](#) of the Guidelines, reflecting the partial deletions, and applies to credit institutions across the EU.

Date of publication: 29/04/2026

EP: Joint EU declaration agreeing a “one Europe, one Market” roadmap

Status: Final

The EP, the Council of the EU and the EC [announced](#) the signing of a joint declaration agreeing to a “one Europe, one Market roadmap”, committing to deliver measures to strengthen and complete the EU Single Market by the end of 2027. The roadmap reflects a coordinated political and operational commitment to boost EU competitiveness amid geopolitical and economic volatility. It includes clear targets for legislative proposals and agreement by the co-legislators (set out in the annex), quarterly progress reviews, defined responsibilities for all EU institutions, and regular stocktaking to oversee implementation of the roadmap.

The annex groups key legislative and policy initiatives, together with indicative timelines, under five strategic building blocks: (i) simplifying rules; (ii) creating a more integrated Single Market, with the ten most harmful barriers removed; (iii) championing strong trade; (iv) reducing energy prices and decarbonising; and (v) driving digital and AI transformation. The three institutions commit to respecting these timelines and giving these initiatives the highest political priority in a manner that respects the legislative process and prerogatives of each institution.

Date of publication: 24/04/2026

EBA: Response to the EC targeted consultation on the competitiveness of the EU banking sector

Status: Final

The EBA published its response to the EC’s targeted [consultation](#) on the competitiveness of the EU banking sector. The EBA emphasises the importance of completing and deepening the single market and the banking union as key drivers of competitiveness. It also highlights the resilience of EU banks, strengthened by the post-financial crisis

reforms, while noting ongoing challenges, including geopolitical risks, exposures to non-bank financial institutions and digital transformation.

Building on the findings from its October 2025 [report](#) on the efficiency of the regulatory and supervisory framework (which put forward 21 recommendations to simplify the banking rulebook), the EBA emphasises that competitiveness can be enhanced through targeted simplification. It states that such efforts should respect the principles of: maintaining financial stability and credibility through continued commitment to Basel III standards; enabling banks to fully benefit from the single market while preserving and deepening it and the banking union; and ensuring an EU-wide level playing field, applying proportionality where appropriate to avoid the fragmentation of the rulebook. The EBA confirms it will continue to work closely with the EC to support a competitive, resilient and stable EU banking sector.

Date of publication: 17/04/2026

EC: Announcement of action to ensure complete and timely transposition of EU Directives

Status: Final

The EC announced that it is taking action against several EU member states that have failed to notify it of measures they have adopted to transpose EU directives into their national laws. In particular, it has sent letters of formal notice to:

- ♦ Belgium, Bulgaria, Cyprus, Denmark, Estonia, France, Greece, Italy, Latvia, Lithuania, Luxembourg, Malta, the Netherlands, Poland, Portugal, Romania, Slovenia, Spain and Sweden for failing to fully transpose the European Single Access Point (ESAP) Omnibus Directive (Directive 2023/2864); and
- ♦ Austria, Belgium, Bulgaria, Croatia, Cyprus, Estonia, Finland, France, Germany, Greece, Ireland, Latvia, Lithuania, Luxembourg, Malta, the Netherlands, Poland, Portugal, Romania, Slovakia, Spain, Finland and Sweden for failing to fully transpose the amending Sixth CRD (Directive 2024/1619).

The member states concerned now have two months to respond, complete their transposition and notify the EC of their measures. In the absence of a satisfactory response, the EC may decide to issue a reasoned opinion.

Date of publication: 27/03/2026

(ii) Eurozone

ECB: Eurosystem's response to EC consultation on the competitiveness of the EU banking sector

Status: Final

The ECB published its Governing Council's response to the EC's targeted [consultation](#) on the competitiveness of the EU banking sector. The response builds on the ECB's High-Level Task Force (HLTF) simplification [proposals](#), endorsed by the ECB in December 2025. The response and proposals are endorsed by all euro-area central banks.

The ECB supports an ambitious reform agenda to enhance the competitiveness of EU banks while preserving financial resilience. It emphasises that competitiveness should be driven by greater harmonisation, integration, and scale rather than deregulation. It considers that while post-crisis prudential reforms have strengthened resilience without restricting banks' capacity to finance the economy, fragmentation of EU banking markets continues to constrain banks' ability to scale and compete globally.

To address this, the proposals include:

- ◆ Treating the banking union as a single European jurisdiction for the purpose of financial regulation.
- ◆ Allowing capital and liquidity to flow freely within cross-border banking groups in the banking union (subject to safeguards for credit institutions and their subsidiaries, branches and consolidated groups).
- ◆ Finalising the European Deposit Insurance Scheme (EDIS) with a clear implementation timetable.
- ◆ Making the ECB Governing Council responsible for taking a holistic view of the overall level of capital demand within and across the banking union.
- ◆ Further harmonising the prudential regulatory framework and reducing non-prudential barriers, starting with merging the CRD into the CRR, to reduce regulatory divergences arising from national implementation.
- ◆ Simplifying the macroprudential framework by merging the existing five macroprudential buffers into two: (i) a non-releasable buffer (merging the current capital conservation buffer and the buffers for global and other systemically important institutions); and (ii) a releasable buffer (merging the current countercyclical capital buffer and systemic risk buffer).
- ◆ Aligning the minimum requirement for own funds and eligible liabilities (MREL) and total loss-absorbing capacity (TLAC) frameworks more closely (without reducing gone-concern resources).
- ◆ Expanding the degree of proportionality under the existing regime for small and non-complex institutions and increasing consistency in the application of the proportionality principle in supervision.
- ◆ Streamlining the EU banking reporting framework, including by implementing the HLTf's six reporting-focused simplification recommendations, while maintaining the "supervisory need to know" principle.
- ◆ Adjusting the prudential framework to close regulatory gaps between banks and non-banks to preserve the level playing field and reduce disintermediation risks while also supporting innovation.

Date of publication: 14/04/2026

b) Solvency/Own funds issues

(i) EU

EBA: Updated list of correlated currencies

Status: Draft

The EBA updated the list of correlated currencies in accordance with the technical standards mandated by Article 354 of the CRR. Article 354 allows institutions to provide lower own funds requirements against positions in relevant closely correlated currencies.

The EBA updated the list by way of a draft Implementing Regulation amending the relevant technical standards (which are set out in Implementing Regulation (EU) 2015/2197), with an [Annex](#) confirming the revised list. The update is intended to ensure that the listed currency correlations continue to reflect actual market conditions and is based on the EBA's latest assessment using data from the period up to 31 March 2025. The amendments do not introduce any methodological or substantive policy changes, but instead apply the existing framework in Implementing Regulation (EU) 2015/2197 to an updated data set. Once adopted, the Amending Implementing Regulation will replace the current Annex to Implementing Regulation (EU) 2015/2197 and will enter into force on the 20th day following publication in the OJ. The revised list has been submitted to the EC for endorsement, as confirmed in the EBA's [press release](#).

Date of publication: 28/04/2026

EBA: Opinion in response to EC's proposed changes to the final draft RTS on operational risk

Status: Final

The EBA published an opinion responding to the EC proposed amendments to the EBA's final draft RTS on operational risk under the CRR as amended by CRR3. The EBA previously published reports on the [final draft RTS and implementing technical standards](#) in June 2025, followed by further [final draft RTS](#) on operational risk loss in August 2025. In March 2026, the EC informed the EBA in a [letter](#) of its intention to endorse the draft RTS with amendments, including bundling the RTS into a single Commission Delegated Regulation.

The EBA has raised concerns that two of the EC's proposed changes could undermine the consistency, transparency and supervisory effectiveness of the operational risk capital framework, and invites the EC to reconsider them. In particular, the EBA objects to the proposed combined use of the accounting approach (AA) and prudential boundary approach (PBA) for calculating the financial component of the business indicator, noting that this is not envisaged under the Basel standard and could increase complexity, create inconsistencies across risk frameworks and facilitate regulatory arbitrage. It considers that the application of only one approach to the full balance sheet is necessary to preserve the coherence of the framework. The EBA also cautions against limiting notification obligations to competent authorities to material changes in the PBA's scope when used alongside the AA, arguing this could weaken supervisory oversight by introducing institution-specific materiality judgements. The EBA nonetheless supports the EC's other amendments aimed at improving readability and legal certainty.

Date of publication: 23/04/2026

EC: Consultation on draft Delegated Act on market risk prudential requirements for EU banks

Status: Consultation

Deadline for the submission of comments: 19/05/2026

The EC launched a consultation on a draft delegated act proposing targeted amendments to the EU prudential framework for banks' market risk, specifically the Fundamental Review of the Trading Book (FRTB) under the CRR. While most Basel III reforms have applied since 1 January 2025, the FRTB has been [deferred](#) on several occasions, most recently to 1 January 2027 in response to uncertainty around implementation timelines and potential deviations from the Basel standards in other major jurisdictions. The draft delegated act sets out amendments, intended to apply from 1 January 2027, to support a level playing field for EU banks competing internationally in trading activities by offsetting the negative capital impact of the FRTB for a period of three years. The proposals reflect feedback from a November 2025 [consultation](#) and input from member state experts. Formal adoption of the delegated act is expected on 19 May, to provide banks and supervisors with greater certainty ahead of implementation.

The amendments and the multiplier proposed in the delegated act have an impact on requirements in other parts of the CRR, which are ancillary to, or connected with the entry into force of, the FRTB. The explanatory memorandum states that, where necessary, guidance on how banks should apply these requirements during the postponement period will be provided in the communication package and further specified by the EBA to ensure consistency and harmonisation in implementation across banks. It also states that, considering the temporary nature of the targeted measures of the delegated act and the potential for permanent distortions to the level playing field following implementation in other jurisdictions, the Commission will reassess the necessary next steps in the context of the 2026 report on the competitiveness of the EU banking sector.

Date of publication: 21/04/2026

EC: Commission Delegated Regulation (EU) .../... supplementing the CRR with regard to RTS specifying what constitutes an equivalent legal mechanism that ensures that a residential property under construction is completed within a reasonable time frame

Status: Adopted by the EC

The EC adopted a Delegated Regulation supplementing the CRR, as amended by the CRR3. It sets out RTS specifying what constitutes an equivalent legal mechanism to ensure that a residential property under construction is completed within a reasonable time frame. The Delegated Regulation is based on the EBA's [final draft RTS](#), published in August 2025. Article 124 of the CRR sets out the requirements for assigning risk weights to exposures secured by mortgages on immovable property, including conditions under which exposures to properties under construction may qualify for preferential treatment. The EC has the power under Article 124(14) to specify what constitutes an equivalent legal mechanism to ensure that a property under construction is completed within a reasonable time frame.

In particular, the RTS specify the conditions that must be met for a legal mechanism to be considered equivalent, including: (i) defining the requirements applicable to the protection provider, notably in terms of its creditworthiness; (ii) clarifying that the provider must be a regulated institution or insurance undertaking; (iii) setting out the operational and legal features of a qualifying completion guarantee, including the obligation to cover all remaining construction costs or, where completion is not possible, to repay the credit institution an amount equivalent to the outstanding exposure; and (iv) clarifying that completion guarantees must be comprehensive, legally binding and enforceable, and must not contain clauses that allow the provider to unilaterally reduce or cancel its obligations. Where the protection provider and the credit institution belong to the same group, the treatment of the property as completed may not be recognised at the consolidated level. The RTS also set out the conditions that must be met for a completion guarantee to be converted into a repayment guarantee.

The Delegated Regulation will enter into force on the 20th day after its publication in the OJ and is directly applicable across member states.

Date of publication: 16/04/2026

ECB/ESRB: Report on the workstream for buffer usability

Status: Final

The ECB and ESRB published a joint report on the usability of capital buffers. The report analyses how prudential and resolution frameworks interact, and how this interaction may limit buffer usability. Key takeaways include:

- ◆ Prudential and resolution frameworks are distinct but complementary. Their interaction is complicated. In particular, the report notes that the way common equity tier capital may be used to satisfy multiple requirements may limit its ability to absorb losses.
- ◆ In addition to the double-counting of capital, resolution frameworks can impact buffer usability when authorities use their discretionary powers to apply restrictions relating to the maximum distributable amount related to MREL.
- ◆ To evaluate the macroprudential impact of the relationship between the frameworks, a consistent methodology is needed. In line with this, the report defines the following key concepts: buffer usability; releasability; capital headroom; and loss-absorption capacity. It also provides a methodology for quantifying and evaluating these concepts. In addition, the report has developed the analytical framework, and updated the buffer usability simulation tool that has been used by national authorities in recent years.
- ◆ A key difference between the regimes which creates challenges is the different prudential and resolution consolidation perimeters which may be applied (for example, the perimeter may be applied at the highest level

of consolidation, or at a sub-consolidated level). The report highlights this issue and provides guidance on how to address it.

- ♦ Limited buffer usability increases the risk of banks breaching minimum requirements during stress periods, and the interaction between prudential and resolution frameworks may limit authorities' ability to create additional capital headroom, which could harm the real economy and impact financial stability.

The report does not make policy recommendations, and is only intended to serve as a shared reference point and analytical basis for future policy discussions.

Date of publication: 09/04/2026

ECB: Streamlining the supervision of banks' internal models

Status: Final

The ECB announced changes to streamline the supervision of banks' internal models for credit risk, aimed at making the approval process for material model changes faster and more predictable while maintaining prudential safeguards. From 1 October 2026, banks will be permitted to implement material changes to their internal models for credit risk shortly after submitting a complete application package. This will allow banks to implement model changes quickly, without having to maintain old and new models in parallel while awaiting supervisory review. This is subject to confirmation from each bank's internal control function that the revised model complies with regulatory requirements and that the bank is ready to implement the change. Where changes lead to lower risk weights, expedited approval will still apply, but any capital benefit will be capped by a supervisory floor applied to all approved model changes, and only lifted once the ECB completes a targeted on-site review. The ECB will retain the option to apply the standard approval process in higher-risk or sensitive cases, with banks waiting for the outcome of a dedicated on-site investigation. Material model changes will no longer automatically trigger an on-site investigation.

The EBA also published final draft RTS amending the framework for assessing the materiality of changes to internal ratings-based models

Date of publication: 30/03/2026

(ii) Eurozone

ECB: Eurosystem's response to EC consultation on the competitiveness of the EU banking sector

Status: Final

The ECB published its Governing Council's response to the EC's targeted [consultation](#) on the competitiveness of the EU banking sector. For more information, please see section 1.1a) above.

Date of publication: 14/04/2026

c) Cyber security

(i) EU

ESAs: Joint Committee Annual Report 2025

Status: Final

The ESAs published a Joint Committee annual report for 2025, setting out the main priorities and achievements of its cross-sectoral work over the past year. In 2025, the Joint Committee focused on protecting consumers in increasingly digital financial markets, strengthening operational and cyber resilience through the implementation of the DORA, improving the effectiveness of sustainable finance disclosures, and enhancing cross-sectoral risk monitoring.

Date of publication: 24/04/2026

Commission Delegated Regulation (EU) 2026/881 supplementing Regulation (EU) 2024/2847 by specifying the terms and conditions for applying the cybersecurity-related grounds in relation to delaying the dissemination of notifications

Status: Published in the OJ

Date of entry into force: 10/05/2026

Commission Delegated Regulation (EU) 2026/881 supplementing Regulation (EU) 2024/2847 by specifying the terms and conditions for applying the cybersecurity-related grounds in relation to delaying the dissemination of notifications was published in the OJ.

Date of publication: 20/04/2026

d) Internal governance/"Authorised Persons Regime"

EBA: Report on benchmarking of diversity practices in the EU banking sector

Status: Final

The EBA published the results of its benchmarking analysis on diversity practices in the management bodies of more than 850 institutions, credit institutions and investment firms across the EU. As of 31 December 2024, significant gender imbalances and pay gaps persisted, particularly at senior management level, despite some progress when compared to the situation in 2021. The EBA calls on institutions to consider promoting a more balanced representation of genders, and on competent authorities to continue assessing diversity and gender pay gap practices as part of their supervisory reviews.

Date of publication: 23/04/2026

e) Large exposures/Limits to shadow banking entities

(i) EU

EBA: Consultation on draft revised Guidelines on limits on exposures to shadow banking entities which carry out banking activities outside a regulated framework under Articles 395(2) and (2a) CRR

Status: Consultation

Deadline for the submission of comments: 09/07/2026

The EBA launched a consultation on revised Guidelines on limits on exposures to shadow banking entities (SBEs) carrying out banking activities outside a regulated framework under Article 395(2) and (2a) CRR. The proposed revisions update the 2015 Guidelines to align with the harmonised CRR framework introduced by [Commission Delegated Regulation \(EU\) 2023/2779](#), which now provides binding and maximum harmonised criteria for identifying SBEs. Accordingly, definitions and scoping elements previously contained in the Guidelines have been removed, including the 0.25% materiality threshold, to ensure consistency with CRR reporting and disclosure requirements.

The Guidelines retain their core purpose of setting supervisory expectations on how institutions should manage and monitor their exposures to SBEs to ensure that risks arising from such exposures are properly identified, measured, limited and controlled. They preserve existing governance requirements and the primary and fallback methods for setting exposure limits. No new quantitative limits are to be introduced at this stage.

Input gathered through the consultation will inform the finalisation of the Guidelines and broader EBA policy work, including a report on the contribution of SBEs to the capital markets union and an assessment of institutions' exposures and limits. The report is expected by December 2027.

Date of publication: 09/04/2026

f) Supervisory reporting

(i) EU

EBA: Consultation on two ITS on major simplification of supervisory reporting to deliver a simpler, smarter and more proportionate framework

Status: Consultation

Deadline for the submission of comments: 10/07/2026

The EBA announced a series of measures, and published two consultation papers, to simplify the supervisory reporting framework under the CRR. The aim is to deliver a simpler, smarter and more proportionate framework.

- ♦ A [first consultation paper](#) (EBA/CP/2026/07) proposes revisions to the ITS on supervisory reporting set out in [Commission Implementing Regulation \(EU\) 2024/3117](#). The proposals are set out in a modular format, with each module accessible from a [webpage](#), and combine regulatory-driven amendments—including adoption of IFRS 18, the integration of ESG risks into prudential supervision and the forthcoming application of the revised market risk framework under the Fundamental Review of the Trading Book—with a broad set of simplification measures aimed at reducing reporting costs and complexity, particularly for small and non-complex institutions. The proposed simplification measures focus on reducing data points and templates, adjusting reporting frequency and scope, enhancing proportionality for small and non-complex institutions (SNCIs), expanding the use of a “core plus supplement” approach, integrating parallel data collections at the EBA level (such as stress testing and supervisory benchmarking), improving alignment of definitions and qualitative elements and

harmonising and integrating into the EBA reporting framework reporting requirements now requested at a national/jurisdictional level. In addition, the adoption of IFRS 18 on presentation and disclosure in financial statements requires amendments to FINREP reporting.

There is a public hearing on the first consultation on 5 May 2026. The EBA plans to submit its final report and draft ITS to the EC for adoption by the end of the year. First reporting under the revised framework is expected for the reference date of 30 September 2027. In deviation from the general submission deadline, the consultation is open until 10 May 2026 for IFRS 18-related changes in FINREP.

- ♦ A [second consultation paper](#) (EBA/CP/2026/08) consults on draft ITS amending the ITS on supervisory reporting regarding credit risk (CR) and IFRS 9 benchmarking reporting, together with draft [instructions](#) and [templates](#). The EBA explains that, up to 2026 (with reference date 31 December 2025), CR and IFRS 9 benchmarking templates were set out in separate ITS. From 2027, the EBA is proposing to simplify and integrate those templates into the ITS on supervisory reporting. In addition to this integration, the following changes are suggested:
 - ♦ For CR, the proposals include significant revisions driven by the CRR 3 and CRD VI, and a reduction in the number of data points to be reported. It is also envisaged to limit the reporting requirement to the highest level of consolidation at the EU level for banking groups, and on an individual basis for standalone institutions. However, this may be revisited during the consultation.
 - ♦ For IFRS 9, the EBA proposes merging the templates with the CR templates using separate sub templates.

The EBA will also develop the data point model, XBRL taxonomy and validation rules based on the final draft amending ITS. The first reporting is aimed for the 2027 exercise (December 2026 reference date). However, anticipating possible delays in the timeline, it is possible that alternative fallback solutions will have to be taken into consideration. A public hearing on the second consultation will take place on 24 June 2026.

The EBA has separately published a [report](#) on the simplification of supervisory reporting and an [overview](#) of the data requests and simplification actions by competent authorities.

Date of publication: 10/04/2026

EBA: List of known data point model issues to enhance transparency and support reporting institutions

Status: Final

The EBA announced that it will regularly publish a list of known issues relating to the data point model (DPM) framework, with the aim of enhancing transparency and supporting reporting institutions. The list will serve as a single reference point for recurring technical issues. This is part of the EBA's broader simplification efforts to support the implementation of reporting requirements and reduce unnecessary operational burden, while maintaining data quality and supervisory objectives. This list covers issues relating to Pillar 3 disclosures and resolution planning reporting.

Date of publication: 09/04/2026

1.2 RECOVERY AND RESOLUTION

(i) EU

Publication of one Regulation and two Directives reforming the CMDI framework

Status: Published in the OJ

Date of entry into force: 10/05/2026

Date of application: 11/05/2026 and 12/05/2028

The legislative package reforming the crisis management and deposit insurance (CMDI) framework for banks in the EU was published in the OJ. The package includes targeted amendments to: (i) the [Bank Recovery and Resolution Directive \(BRRD\)](#) regarding early intervention measures, conditions for resolution and funding of resolution action, and Directive 2014/24/EU, regarding valuation services in resolution; (ii) the [Single Resolution Mechanism Regulation \(SRMR\)](#) regarding early intervention measures and conditions for resolution and funding of resolution action; and (iii) the [Deposit Guarantee Schemes Directive \(DGSD\)](#) regarding the scope of deposit protection, use of deposit guarantee schemes funds, cross-border cooperation, and transparency.

The reforms aim to strengthen the EU's ability to manage bank failures, including small and medium-sized banks, by facilitating access to industry-funded safety nets, such as national resolution funds and the Single Resolution Fund. These tools are intended to supplement a failing bank's own loss-absorption capacity, thereby reducing reliance on taxpayer-funded bailouts, referred to as the "bridge the gap" mechanism. The transposition deadline for amendments to the two directives is 11 May 2028. The amendments to the SRMR and DGSD are to apply (with some exceptions) from 11 May 2028 and the amendments to the BRRD from 12 May 2028.

This publication has been welcomed in an [SRB statement](#), highlighting it as a key milestone in strengthening the EU's crisis management framework and reinforcing financial stability.

- ◆ [Publication of Directive \(EU\) 2026/806 amending the BRRD as regards early intervention measures, conditions for resolution and funding of resolution action and Directive 2014/24/EU as regards valuation services in resolution](#)
- ◆ [Publication of Regulation \(EU\) 2026/808 amending the SRMR as regards early intervention measures, conditions for resolution and funding of resolution action](#)
- ◆ [Publication of Directive \(EU\) 2026/804 amending the DGSD as regards the scope of deposit protection, the use of deposit guarantee schemes funds, cross-border cooperation, and transparency](#)

Date of publication: 20/04/2026

EBA: Report on banks' dry run testing of their recovery plans

Status: Final

The EBA [published](#) a report analysing the recovery plan submissions of 16 European cross-border banking groups, whose parent institutions are located in ten different EU countries, with a particular focus on the practices observed in relation to recovery plan "dry runs". The exercise aims to inform institutions' future designs of recovery plan dry runs and contribute to the development of useful benchmarks for their implementation—it is not intended to provide prescriptive guidance.

The analysis confirms that, although recovery plan dry runs are not explicitly covered in the regulatory framework, they are a highly effective tool for enhancing the operationalisation of recovery plans and strengthening institutions' overall crisis preparedness frameworks. Most institutions recognise their value, however, approaches and levels of maturity vary significantly. Where dry runs are carried out primarily to meet supervisory expectations, they tend to

be less effective, resembling compliance exercises with limited insights and follow-up actions. In contrast, institutions with more advanced practices use dry runs as genuine management tools, fully embedding recovery planning within their broader risk management framework. In these cases, dry runs strengthen internal preparedness by enhancing the credibility, feasibility and organisational understanding of recovery planning arrangements.

Looking ahead, the EBA highlights the importance for institutions to maintain regular, high-quality testing of key recovery plan elements and to continue refining their dry run practices. The report also points to the potential benefits of stronger synergies and better integration of testing activities across recovery and resolution.

Date of publication: 13/04/2026

ECB/ESRB: Report of the workstream on buffer usability

Status: Final

The ECB and ESRB published a joint report on the usability of capital buffers. For more information, please see section 1.1b) above.

Date of publication: 09/04/2026

(ii) Eurozone

SRB: Response to EC consultation on the competitiveness of the EU banking sector

Status: Final

The SRB published its response to the EC's targeted [consultation](#) on the competitiveness of the EU banking sector. The SRB emphasises that while the banking union has substantially strengthened the resilience of EU banks, its incomplete nature continues to hinder cross-border integration and efficiency.

The SRB highlights the need for progress towards a more integrated European deposit protection framework, a strengthened and more predictable approach to liquidity in resolution, and improvements to the cross-border allocation of capital and liquidity within banking groups, supported by robust resolvability safeguards. It also calls for targeted simplification of the regulatory framework, including greater coherence across prudential, resolution and macroprudential requirements and streamlined minimum requirements for own funds and eligible liabilities processes, while maintaining overall resilience and financial stability. The SRB states that these measures would support both market integration and the international competitiveness of EU banks, and confirmed its intention to continue engaging with the EC as it develops its policy response.

Date of publication: 15/04/2026

ECB: Eurosystem's response to EC consultation on the competitiveness of the EU banking sector

Status: Final

The ECB published its Governing Council's response to the EC's targeted [consultation](#) on the competitiveness of the EU banking sector. For more information, please see section 1.1b) above.

Date of publication: 14/04/2026

2. Market regulation/ Conduct rules

2.1 BENCHMARKS

(i) EU

EC: Commission Implementing Regulation (EU) 2026/905 supplementing Regulation (EU) 2016/1011 by establishing a list of spot foreign exchange benchmarks exempt from its application

Status: Published in the OJ

Date of application: 17/05/2026

Commission Implementing Regulation (EU) 2026/905 supplementing the EU Benchmark Regulation (EU) 2016/1011 (BMR) was published in the OJ. The Implementing Regulation designates a list of spot foreign exchange (FX) benchmarks that meet the criteria in Article 18a of the BMR, with the effect that those benchmarks are excluded from the scope of the BMR. The designated benchmarks are:

- ◆ USD/INR (U.S. dollar/–Indian rupee).
- ◆ USD/KRW (U.S. dollar/–Korean won).
- ◆ USD/TWD (U.S. dollar/–Taiwan dollar).
- ◆ USD/PHP (U.S. dollar/–Philippine peso).

A [draft version](#) of the Regulation was published in January 2026 for consultation following feedback from a May 2025 consultation assessing whether the benchmarks satisfy the Article 18a conditions, including their widespread use for hedging purposes and the absence of equivalent EU-administered benchmarks. The Regulation enters into force on 17 May 2026, being the 20th day following its publication in the OJ.

Date of publication: 24/04/2026

ESMA: Official translations of Guidelines on the submission of periodic information by Benchmark Administrators, CRAs and Market Transparency Infrastructures

Status: Final

ESMA published a webpage of official translations of its Guidelines on the periodic information that benchmark administrators, credit rating agencies (CRAs), data reporting services providers and market transparency infrastructures must submit to ESMA. The Guidelines repeal and replace ESMA's [previous](#) 2019 Guidelines on the submission of periodic information by CRAs, together with its [previous](#) 2021 Guidelines on periodic information and notification of material changes to be submitted to ESMA by trade repositories. The Guidelines have applied since 1 January 2026. They clarify the format and frequency of the different categories of information which ESMA expects to receive in its role as supervisor, as well as harmonising and simplifying periodic reporting by these entities. The related final report was [originally published](#) in June 2025.

Date of publication: 14/04/2026

2.2 CREDIT RATING AGENCIES

(i) EU

ESMA: Call for evidence on the restricted subscription and private credit ratings

Status: Call for evidence

Deadline for the submission of comments: 31/05/2026

ESMA launched a call for evidence on the purposes, market practices, needs and risks associated with restricted subscription and private credit ratings. In particular, ESMA seeks views on:

- ♦ The characteristics and use cases of restricted subscription and private credit ratings, including their benefits when compared with publicly disclosed ratings.
- ♦ The characteristics of the parties who are contracting for restricted subscription and private credit ratings and those to whom they are disclosed or distributed.
- ♦ Evidence on whether, and to what extent, the analytical processes, governance arrangements, and internal controls applied to restricted subscription and private credit ratings are comparable to those applied to public credit ratings.

ESMA requests evidence-based responses, including quantitative information where available, as well as concrete examples drawn from market practice. Responses will be reviewed in Q2 2026 with a view to assessing whether specific regulatory adjustments or clarifications may be needed to enhance clarity on the application of the Credit Rating Agencies Regulation.

Date of publication: 16/04/2026

ESMA: Official translations of Guidelines on the submission of periodic information by Benchmark Administrators, Credit Rating Agencies and Market Transparency Infrastructures

Status: Final

ESMA published a webpage of official translations of its Guidelines on the periodic information that benchmark administrators, credit rating agencies (CRAs), data reporting services providers and market transparency infrastructures must submit to ESMA. For more information, please see section 2.1 above.

Date of publication: 14/04/2026

2.3 MARKET ABUSE

(i) EU

EC: Adoption of two Delegated Regulations on disclosures and trading under the MAR

Status: Adopted by the EC

The EC adopted two Delegated Regulations under the MAR to reflect amendments introduced by the Listing Act (Regulation (EU) 2024/2809).

The first **Delegated Regulation** sets out requirements on the disclosure of inside information in protracted processes, including the conditions and arrangements for a delay of disclosure. Under Article 17(1) of the MAR, issuers must disclose inside information as soon as possible, although Article 17(4) permits delayed disclosure in certain circumstances. The Listing Act amended this regime by excluding intermediate steps in protracted

processes from disclosure (provided that confidentiality is maintained), and by clarifying when disclosure may be delayed. The Delegated Regulation sets out non-exhaustive lists of: (i) final events or circumstances that trigger disclosure, along with the timing of such disclosure; and (ii) situations where there is a contrast between inside information whose disclosure is intended to be delayed, and the most recent public announcement or communication by the issuer or emission allowance market participant on the same subject. The Regulation will enter into force on the third day following its publication in the OJ.

The second [Delegated Regulation](#) amends [Delegated Regulation \(EU\) 2016/522](#) to: (i) reflect the broader scope of the exemptions from the prohibition for persons discharging managerial responsibilities to trade during closed periods, as set out in Article 19(12) of the MAR; (ii) establish a list of designated trading venues that have a significant cross-border dimension for the purpose of implementing the mechanism to exchange order data referred to in Article 25a of the MAR with respect to shares; and (iii) update Annex II on the practices specifying the indicators of market manipulation, to account for technical developments such as algorithmic trading, and to correct a few erroneous cross-references. The Amending Regulation will enter into force on the 20th day following publication in the OJ.

Date of publication: 08/04/2026

2.4 MIFID/MIFIR

(i) EU

ESMA: Call for evidence on the market structure of European equity markets

Status: Call for evidence

Deadline for the submission of comments: 30/06/2026

ESMA launched a call for evidence on the structure of European equity markets, presenting an analysis of trends between 2022 and 2025, based on transaction data reported under MiFIR. ESMA's analysis suggests that equity markets continue to function well overall, with stable levels of addressable liquidity and on-book trading, although it notes a decline in lit continuous trading that has been offset by greater use of other trading mechanisms, including closing auctions, frequent batch auctions and systematic internaliser trading. The analysis also covers how liquidity is allocated across different trading mechanisms on a country-by-country basis.

ESMA invites stakeholder input on a broad range of topics, including: (i) ESMA's understanding of the trading landscape; (ii) identified trends in relation to on- and off-book trading, and addressable and non-addressable liquidity; (iii) price formation; (iv) attractiveness and choice of venue; (v) dedicated questions on dark trading and 24-hour (or extended-hour) trading; (vi) the growing use of benchmark transactions; and (vii) member preferencing. The call for evidence also confirms that ESMA has decided to repeal the Q&A which states that periodic auctions are subject to the tick size regime. A feedback statement is expected in the second half of this year.

Date of publication: 30/04/2026

EC: Commission Delegated Regulation (EU) .../... supplementing MiFID II with regard to RTS specifying the criteria to be taken into account in establishing and assessing the effectiveness of order execution policies of investment firms and repealing Delegated Regulations (EU) 2017/575 and (EU) 2017/576

Status: Adopted by the EC

The EC adopted a Delegated Regulation supplementing MiFID II with regard to RTS specifying the criteria to be taken into account by investment firms when establishing and assessing the effectiveness of their order execution policies. The Delegated Regulation is based on ESMA's [final draft RTS](#) published in April 2025. The RTS specify rules on, among other things: (i) selecting execution venues; (ii) monitoring investment firms' execution policies; (iii) order routing; (iv) the handling of specific client instructions and related investor protection safeguards; (v) the periodic assessment of investment firms' order execution policies; and (vi) how to identify classes and subclasses of financial instruments for which investment firms execute orders on behalf of clients.

When the Delegated Regulation enters into force, it will repeal Delegated Regulation (EU) 2017/575, which sets out data to be published by execution venues on the quality of execution of transactions through their venues, and Delegated Regulation (EU) 2017/576, which sets out obligations for investment firms to publish information on the identity of execution venues and the quality of execution obtained.

The Delegated Regulation will enter into force on the 20th day following its publication in the Official Journal of the European Union. It will apply 18 months after its entry into force, allowing firms time to update their order execution policies, procedures and systems.

Date of publication: 14/04/2026

ESMA: Official translations of Guidelines on the submission of periodic information by Benchmark Administrators, Credit Rating Agencies and Market Transparency Infrastructures

Status: Final

ESMA published a webpage of official translations of its Guidelines on the periodic information that benchmark administrators, credit rating agencies (CRAs), data reporting services providers and market transparency infrastructures must submit to ESMA. For more information, please see section 2.1 above.

Date of publication: 14/04/2026

ESMA: Q&As clarifying expectations ahead of the launch of the EU consolidated tapes

Status: Final

ESMA published [new Q&As](#) on the onboarding of data contributors to the EU's consolidated tapes (CTs) and on the operational rules for consolidated tape providers (CTPs), as part of preparations for their launch. This follows ESMA's earlier selection of the first CTPs, including the [appointment of fairCT](#) as the CTP for bonds in July 2025 and [EuroCTP](#) as the CTP for equities. The authorisation processes are currently ongoing for both, while the selection process for the derivatives CTP remains underway, with an announcement expected by July 2026. ESMA expects data contributors to engage with the selected CTPs ahead of formal authorisation to ensure operational readiness, including agreeing data transmission protocols and completing connectivity and end-to-end testing. CTPs are expected to put appropriate safeguards in place to protect the confidentiality and integrity of information received during the preparatory phase.

Date of publication: 01/04/2026

2.5 TRANSPARENCY REQUIREMENTS/SHAREHOLDER REQUIREMENTS

(i) EU

ESMA: Official translations of Guidelines on the submission of periodic information by Benchmark Administrators, Credit Rating Agencies and Market Transparency Infrastructures

Status: Final

ESMA published a webpage of official translations of its Guidelines on the periodic information that benchmark administrators, credit rating agencies (CRAs), data reporting services providers and market transparency infrastructures must submit to ESMA. For more information, please see section 2.1 above.

Date of publication: 14/04/2026



3. Market infrastructure

3.1 CUSTODY RULES

(i) International

IOSCO/CPMI: Report on the implementation monitoring of PFMI regarding the Level 2 assessment for the UK on PSs and CSDs/SSSs

Status: Final

IOSCO and CPMI published a joint report setting out their findings of their Level 2 assessment of the UK's implementation of the principles for financial market infrastructures (PFMI). These principles set expectations for the design and operation of key FMIs in order to enhance their safety and efficiency and, more broadly, limit systemic risk and foster transparency and financial stability. The report sets out the conclusions and recommendations as to whether, and to what degree, the UK legal, regulatory and oversight frameworks applied to systemically important payment systems (PSs), central securities depositories (CSDs) and securities settlement systems (SSSs) as of 30 September 2023.

The report finds that the UK legal, regulatory and oversight frameworks for PSs are complete and consistent with all principles under the PFMI, while the UK legal, regulatory and oversight frameworks for CSDs and SSSs are complete and consistent in most respects, with some areas for improvement where implementation was broadly or partly consistent or not consistent. For UK CSDs and SSSs that provide banking-type ancillary services, the framework was consistent with 15 principles, broadly consistent with five principles (specifically, principles 9, 11, 15, 16 and 23) and not consistent with principle 10. For other UK CSDs and SSSs, additional gaps relating to principles 4 and 7 were found, where implementation was partly consistent.

The report also includes a summary response from the Bank of England (BoE). The BoE states that it is pleased that the assessment outcomes confirm that for payments systems, and broadly for CSDs and SSSs, the UK's framework is complete and consistent with the PFMI. The BoE notes that since the assessment date cut-off on 30 September 2023, it has continued to build on this foundation in responding to developments which impact UK FMIs. Notably, in 2025, the BoE published Fundamental Rules for FMIs, which are based on the PFMI.

Date of publication: 16/04/2026

3.2 EMIR

(i) EU

ESMA: Final report on framework for the sixth ESMA stress test exercise for CCPs

Status: Final

ESMA launched its sixth EU-wide stress test exercise for CCPs under EMIR. The stress test aims to assess CCPs' resilience to severe but plausible adverse market scenarios and identify potential vulnerabilities. The exercise, supported by an [adverse scenario](#) developed by the ESRB, covers 16 CCPs, including all authorised EU CCPs and two UK-based Tier 2 CCPs, and enhances the analytical framework by introducing improved methodologies and expanded scope. For the first time, it assesses the aggregate impact of CCPs' recovery and resolution

arrangements on market participants and EU financial stability. ESMA will launch data collection in early May 2026, with results expected to be published in Q1 2027.

Date of publication: 30/04/2026

ESMA: Reporting templates and instructions for the AAR under EMIR 3

Status: Final

ESMA published the reporting templates and instructions for the active account requirement (AAR) under EMIR 3. The new templates set out in detail how entities subject to the AAR should report the required information to their competent authorities. They cover counterparty information, activities and risk exposures, the representative obligation and declaration on operational conditions. The instructions are designed to ensure a consistent, structured and standardised collection of supervisory data. The first AAR reporting submission is expected on 31 July 2026, covering the period from 25 June 2025 (when the AAR became applicable) to 30 June 2026. After the first reporting submission, reporting will take place every six months, with submissions due on 31 January and 31 July each year, each covering a 12-month reference period.

Date of publication: 13/04/2026

4. Anti-money laundering

(i) EU

EC: Request for feedback regarding a Directive to protect the EU's financial interests by preventing fraud and other crimes against these interests

Status: Request for feedback

Deadline for the submission of comments: 21/05/2026

The EC launched a request for feedback regarding a Directive to protect the EU's financial interests by preventing fraud and other crimes against these interests. It aims to assess the impact of national law in transposing those rules and may be accompanied by a legislative proposal to revise them. This should make it possible to align current rules with new legislation, including on anti-corruption, to further strengthen the EU's anti-fraud framework.

Date of publication: 23/04/2026

AMLA: Consultation on draft RTS on group-wide requirements under Article 16(4) AMLR and on additional measures on branches and subsidiaries in third countries under Article 17(3) AMLR

Status: Consultation

Deadline for the submission of comments: 15/06/2026

AMLA launched a consultation on draft measures setting out requirements for business-wide risk assessments (BWRAs) and group-wide anti-money laundering frameworks and countering the financing of terrorism (AML/CFT) frameworks under the EU Anti Money Laundering Regulation (AMLR). It specifies draft RTS under Articles 16(4) and 17(3) of the AMLR, setting minimum standards for the design and implementation of group-wide AML/CFT frameworks. The RTS address organisational aspects of group-wide AML/CFT requirements, provisions on information sharing within groups, criteria for identifying the parent undertaking in the Union where multiple obliged entities are linked to a third country head office, and the extension of group-wide requirements to structures other than groups (which is particularly relevant to the non-financial sector). The draft RTS also cover additional measures and requirements where branches or subsidiaries operate in third countries. AMLA proposes a single set of RTS to cover both Article 16(4) and Article 17(3) mandates. A public hearing is scheduled for 20 May 2026 and feedback will be considered, with the final draft RTS due to be submitted by 30 September 2026.

Date of publication: 16/04/2026

AMLA: Consultation on draft Guidelines on BWRA under Article 10(4) AMLR

Status: Consultation

Deadline for the submission of comments: 15/07/2026

AMLA launched a consultation on draft Guidelines under Article 10(4) AMLR, specifying the minimum requirements for the content of obliged entities' business-wide risk assessments (BWRAs) and additional sources of information to be considered when carrying out a BWRA. The Guidelines are intended to assist with identifying and assessing risks of AML/CTF and the non-implementation and evasion of targeted financial sanctions. To this end, AMLA proposes four minimum requirements, applicable across all sectors, emphasising that obliged entities retain responsibility for ensuring their BWRA is proportionate to their size, business model, complexity and risk profile. A public hearing is scheduled for 28 May 2026 and AMLA aims to issue the final Guidelines in Q4 2026.

Date of publication: 16/04/2026

EBA: Early release of request for feedback on 4.3 draft technical package of its reporting framework

Status: Draft

The 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. This early release is intended to support reporting entities in preparing for upcoming changes ahead of the final publication, scheduled for June 2026. The EBA invites stakeholders to provide feedback on both the draft technical package and the accompanying glossary. [AMLA also refers](#) to this feedback request.

The draft technical package for release 4.3 includes validation rules, the Data Point Model (DPM) and XBRL taxonomies, and introduces the following new reporting requirements:

- ♦ New ITS on the supervisory reporting of third-country branches, in accordance with Article 48I(1) of the CRD. The first reference date is 31 March 2027.
- ♦ DPM and taxonomy supporting the methodology to identify obliged entities that will fall under the direct supervision of AMLA, with a first reference date of 31 December 2026.

Date of publication: 16/04/2026

EC: Announcement of action to ensure complete and timely transposition of EU Directives

Status: Final

The EC announced that it is taking action against several EU member states that have failed to notify it of measures they have adopted to transpose EU directives into their national laws. For more information, please see section 1.1a) above.

Date of publication: 27/03/2026

(ii) International

FATF: Ministerial declaration on key priorities

Status: Final

The FATF published a ministerial declaration on its key priorities in the fight against illicit finance. The declaration includes an agreement to focus efforts in particular on the growing threat of fraud and strengthening an effective risk-based implementation of the FATF Standards. It also expressed support for responsible innovation in finance, recognising that technology can enhance supervisory and compliance effectiveness.

Date of publication: 17/04/2026

5. Payments

5.1 PAYMENT SERVICES/E-MONEY

(i) EU

Council of the EU: Final compromise texts for proposed Payment Services Package

Status: Draft

The Council of the EU published notes from its General Secretariat to the Permanent Representatives Committee (COREPER), setting out the final compromise text for the proposed revised [Payment Services Directive \(PSD3\)](#) and [Payment Services Regulation \(PSR\)](#), collectively known as “the Payment Services Package”. The legislative package aims to modernise the EU’s regulatory framework for payment services, building on the foundations of PSD2 to enhance consumer protection, strengthen fraud prevention and improve the functioning of open banking. It also seeks to address the pending challenges in the context of the impact and application of PSD2 in the internal market and adapt it to align with new market developments.

The Council also published an “[I](#)” [item note](#) from its General Secretariat, recommending that COREPER approve the text of the draft Directive and draft Regulation with a view to reaching an agreement at second reading with the EP. The Council and the EP agreed their respective negotiating positions on the legislative proposals in June 2025 and April 2024, which we cover in more detail in our blog post titled “[European Council and Parliament reach provisional agreement on EU Payments Package](#)”. For more background on the proposed package, you may wish to read our article titled “[Paving the way for the future of payments - The PSD III package is here: discover its key features](#)”.

Date of publication: 23/04/2026

EBA: Decision harmonising reporting of SEPA data by national authorities

Status: Final

The EBA published a decision dated 1 April 2026, harmonising the way NCAs report data under SEPA Regulation (EU) No 260/2012. Under Article 15(3) of the SEPA Regulation, payment service providers (PSPs) are required to report annually on charges for credit transfers and payment accounts, as well as the shares of transactions rejected due to EU sanctions. Under Article 15(4) of the SEPA Regulation, NCAs must currently share that information with both the EC and the EBA. To avoid double reporting, the decision provides that NCAs will now report this information only to the EBA, via a single reporting channel, on an annual basis by 9 October of each year. The EBA will then make this information available to the EC via its data collection ecosystem, the European Centralised Infrastructure of Data (EUCLID), as soon as possible after receiving it from the NCAs. The decision also clarifies that where NCAs already hold some of the required data, they are responsible for ensuring its accuracy and completeness, without re-collecting it from PSPs. In addition, the Annex to the EBA’s [EUCLID Decision](#) is amended to reflect this new reporting requirement. The decision takes effect immediately.

Date of publication: 10/04/2026

(ii) Eurozone

ECB: Agreements with European standard setters to facilitate digital euro payments

Status: Final

The ECB published a statement explaining that it signed agreements with three European standard-setting organisations (the ECPC, nexo standards and the Berlin Group) to reuse the existing open technical standards, accessible to all stakeholders, for processing digital euro online payments. It sets out that the standards include: (i) CPACE standards, developed by ECPC, supporting contactless “tap-to-pay” payments using near-field communication between a payment device and a payment terminal; (ii) nexo standards specifications for connecting merchants’ systems with the back-end systems of payment service providers and acquirers. These are used, for example, to support payment acceptance and cash-machine transactions; and (iii) Berlin Group standards for allowing payments to be made using an alias (such as a mobile phone number) and supporting balance checks and reconciliation across mobile devices and payment acceptance in areas like digital euro transactions initiated in merchant apps on smartphones.

Date of publication: 24/04/2026

(iii) International

EPC: Guidelines to support an optional exchange of data sets under the Verification Of Payee scheme

Status: Final

The EPC published its Guidelines to support an optional exchange of data sets under the Verification Of Payee (VOP) scheme, which is similar to an inquiry process. The Guidelines aim to support a rapid, transparent and structured handling of issues between VOP scheme participants. They introduce: (i) a structured inquiry request template to facilitate the exchange of information between VOP scheme participants; and (ii) a refund request template. These and related Guidelines are provided for information and guidance purposes only and do not constitute a mandatory requirement for any VOP scheme participants that may, at their discretion, start using this process from 1 May 2026.

Date of publication: 28/04/2026

EPC: Consultation on change requests for Verification Of Payee Rulebook version 2.0

Status: Consultation

Deadline for the submission of comments: 30/06/2026

The EPC launched a consultation on change requests for its Verification Of Payee (VOP) Rulebook version 2.0. This public consultation is part of the change management process of the EPC payment-related schemes regularly organised by the EPC. The **VOP scheme Rulebook** was developed to support payment service providers (PSPs) in meeting their new obligations under the EU Instant Payments Regulation (IPR) which became effective in October 2025 and amended the Single Euro Payments Area (SEPA) Regulation.

Date of publication: 01/04/2026

5.2 PAYMENT AND SETTLEMENT SYSTEMS

(i) EU

ECB: Corrigendum to ECB Regulation (EU) 2025/1355 on oversight requirements for systemically important payment systems

Status: Published in the OJ

A Corrigendum to Regulation (EU) 2025/1355 of the ECB on oversight requirements for systemically important payment systems, was published in the OJ. The Corrigendum makes a purely technical correction to recital 2, replacing a typographical error. The correction does not introduce any substantive changes to the regulatory framework or to the oversight requirements applicable to systemically important payment systems.

Date of publication: 27/03/2026

(ii) International

CPMI: Report on navigating the ISO 20022 migration journey

Status: Final

The CPMI published a report explaining how to navigate the ISO 20022 migration journey. The adoption and harmonised implementation of this standard addresses long-standing inefficiencies in cross-border payments by enabling structured data, reducing message truncation and enhancing straight-through processing. This improves transaction speed, compliance and fraud prevention. The ISO 20022 migration journey spans the pre-migration, migration and post-migration phases. Premigration includes stakeholder engagement and system readiness; migration focuses on cutovers and reconciliation; and post-migration ensures stability, monitoring and long-term benefits through robust governance and harmonisation. ISO 20022 migration is complex: strategies like big bang or phased approaches must align with market infrastructure needs. The report shares practical experiences and technical approaches from successful migrations, addressing challenges and offering insights for operators across diverse adoption scenarios.

Date of publication: 21/04/2026

6. Banking union

6.1 EUROPEAN DEPOSIT INSURANCE SCHEME (EDIS)

(i) Eurozone

ECB: Eurosystem's response to EC consultation on the competitiveness of the EU banking sector

Status: Final

The ECB published its Governing Council's response to the EC's targeted [consultation](#) on the competitiveness of the EU banking sector. For more information, please see section 1.1b) above.

Date of publication: 14/04/2026



7. Institutional supervisory framework

(i) EU

EBA: Final report on Guidelines on supervisory independence of competent authorities under the CRD

Status: Final

The EBA published its final report on Guidelines on supervisory independence of competent authorities under the CRD. The Guidelines clarify the arrangements that competent authorities should have in place to prevent and manage conflicts of interest involving both their staff and members of their governance bodies. These arrangements include declarations of interest, limitations on trading of financial instruments and cooling-off restrictions.

Date of publication: 29/04/2026

8. Special topics

8.1 SUSTAINABLE FINANCE

(i) EU

ESMA: Consultation on Guidelines on the endorsement regime under Article 11 of the ESG Rating Regulation

Status: Consultation

Deadline for the submission of comments: 29/05/2026

ESMA launched a consultation on draft Guidelines on endorsement under the ESG Ratings Regulation (EU) 2024/3005, setting out its proposed approach to the endorsement of non-EU ESG ratings. The proposed Guidelines are intended to complement the statutory endorsement conditions by specifying what information and documentation ESG rating providers are expected to submit when applying to ESMA for endorsement of non-EU ESG ratings, as well as the ongoing requirements for the processes and controls to be demonstrated on an ongoing basis following authorisation. Following the deadline for comments, ESMA will finalise the Guidelines and publish a final report. Further information on the outcome of the consultation and the adoption of the Guidelines will be communicated before the end of July 2026. The Guidelines are expected to apply three months after publication in all EU official languages on ESMA's website, with ESMA taking them into account for supervisory purposes from 2 August 2026.

Date of publication: 29/04/2026

ESAs: Joint committee annual report 2025

Status: Final

The ESAs published a joint committee annual report 2025. For more information, please see section 1.1c) above.

Date of publication: 24/04/2026

EC: Adoption of two ESG rating Delegated Regulations on fees and fines for ESG rating providers

Status: Adopted by the EC

The EC adopted two Delegated Regulations supplementing the ESG Ratings Regulation (EU) 2024/3005 on the transparency and integrity of ESG rating activities. The first draft Delegated Regulation sets out RTS on the supervisory fees to be charged by ESMA to ESG rating providers. The second draft Delegated Regulation establishes the procedural framework for ESMA's imposition of fines and periodic penalty payments on ESG rating providers. Draft versions of the Regulations were published in January 2026 for feedback. The Council of the EU and the EP will now scrutinise the Delegated Regulations and if neither objects, the Delegated Regulations will enter into force on the day following their publication in the OJ, applicable to all member states.

- ◆ Commission Delegated Regulation (EU) .../... supplementing Regulation (EU) 2024/3005 with regard to fees charged by ESMA to ESG rating providers
- ◆ Commission Delegated Regulation (EU) .../... supplementing Regulation (EU) 2024/3005 with regard to rules of procedure on fines and periodic penalty payments imposed to ESG rating providers by ESMA

Date of publication: 24/04/2026

EC: Adoption of two Delegated Regulations on transparency and integrity of ESG rating activities

Status: Adopted by the EC

The EC adopted two Delegated Regulations supplementing the ESG Ratings [Regulation \(EU\) 2024/3005](#) on the transparency and integrity of ESG rating activities. Both Regulations are based on the [final draft RTS](#) published by ESMA in October 2025. They will enter into force on the 20th day following publication in the OJ and will apply from 2 July 2026.

The first [Delegated Regulation](#) sets out RTS on the separation of ESG rating activities from other business activities carried on by ESG rating providers. It specifies the measures and safeguards applicable where a derogation from the separation requirement is relied upon to prevent conflicts of interest. In particular, providers must establish organisational structures and working environments for staff involved in the rating process, separate from any activities listed in Article 16(1) of the ESG Ratings Regulation. Staff will also require regular self-declarations confirming non-involvement in those activities. Additional technical and internal control measures apply where providers intend to carry on investment services and/or insurance or reinsurance activities, with further safeguards for those that provide, or intend to provide, benchmarks.

The second [Delegated Regulation](#) sets out RTS on the information ESG rating providers must disclose to the public and to users of ESG ratings, rated items and issuers of rated items. It specifies the content, structure and presentation of disclosures under Annex III of the ESG Ratings Regulation, including product-level disclosures on what risks and impacts are assessed, as well as the methodologies, models and assumptions applied. The Delegated Regulation also establishes a higher level of methodological disclosures for users and rated items.

The EC also adopted the Commission Delegated Regulation supplementing Regulation (EU) 2024/3005 with regard to RTS specifying the elements of ESG rating products to be disclosed to the public and to users of ESG ratings, rated items and issuers of rated items.

- ◆ [Commission Delegated Regulation \(EU\) .../... supplementing the ESG ratings Regulation with regard to RTS specifying the elements of ESG rating products to be disclosed to the public and to users of ESG ratings, rated items and issuers of rated items](#)
- ◆ [Commission Delegated Regulation \(EU\) .../... supplementing the ESG ratings Regulation with regard to RTS specifying the measures and safeguards to be implemented by ESG rating providers to separate their ESG rating activities from their other activities](#)

Date of publication: 21/04/2026

ESAs: Joint Guidelines on ESG stress testing

Status: Published

Date of application: 01/01/2027

The [official translations](#) of the ESAs' joint final Guidelines on integrating ESG risks into financial stress tests for banks and insurers under the CRD and the Solvency II Directive were published. First [published](#) in January 2025, the Guidelines aim to harmonise the way competent authorities across the EU consistently incorporate ESG risks into their supervisory frameworks. The Guidelines set expectations on long-term considerations and common standards for ESG stress-testing methodologies, including undertaking risk-based materiality assessments across both short-term (up to five years) and long-term (at least ten years) horizons. Competent authorities must now notify

the respective ESA by 31 May 2026 as to whether they comply or intend to comply with the Guidelines or, where relevant, provide their reasons for non-compliance.

Date of publication: 31/03/2026

(ii) International

NGFS: Release of 2026 Nature Package

Status: Final

The NGFS released a new package of materials aimed at supporting central banks and supervisors in assessing and managing nature-related financial risks. The package builds on the [NGFS' 2024 Conceptual Framework](#) and comprises three complementary notes covering: (i) nature -related data, including guidance on identifying and prioritising relevant data sources and metrics, and the use of case studies and AI to improve data quality and availability; (ii) modelling tools for nature scenarios, highlighting current limitations in capturing interactions between nature, climate and the economy and setting out core design principles for future NGFS scenarios; and (iii) supervisory practices, proposing a pragmatic four-step approach that builds on existing climate supervision and addresses current limitations. It offers a pathway towards a more integrated climate/nature prudential framework.

Date of publication: 09/04/2026

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