

COUNTRIES THE CHANGES MAY BE APPLICABLE TO		
	Low	
	Medium	
ASSESSMENT OF LEVELS OF IMPACT/ RISK	High	

NEW PUBLICATIONS	
UK AML/CTF Supervision Reform – Duties, Powers & Accountability	
Commission Notice on the interpretation and implementation of certain legal provisions of the European Green Bond Regulation (C/2025/5885) – FAQs	
The COP30 Taxonomy Roadmap Initiative Progress Report was published	
The European Commission published Digital Omnibus Regulation Proposal	
EBA publishes reporting framework updates	
The FCA published PS25/16	

PRIORITIES	
The FCA and Bank of England finalized guidance on UK EMIR Article 9 reporting via Q&As	
Consolidated questions and answers (Q&A) on the SFDR (Regulation (EU) 2019/2088) and the SFDR Delegated Regulation (Commission Delegated Regulation (EU) 2022/1288)	
Commission Delegated Regulation (EU) 2025/1416 – CSRD Disclosure Deferral	
The European Commission published the Proposal COM(2025) 841 final (20 November 2025) that revises the Sustainable Finance Disclosure Regulation (SFDR)	
The European Commission published Consolidated FAQs on the implementation of Council Regulation No 833/2014 and Council Regulation No 269/2014	

TIMELINE

30 October 2025

- **EBA advises the European Commission on foundations of new AML/CTF regime**
- **EBA Response to the European Commission's Call for Advice on Six AMLA Mandates**

31 October 2025

- **The FCA and Bank of England finalized guidance on UK EMIR Article 9 reporting via Q&As**

3 November 2025

- **Commission Delegated Regulation C(2025)3103 – Market Data Transparency under MiFIR (technical standards)**

4 November 2025

- **Consolidated questions and answers (Q&A) on the SFDR (Regulation (EU) 2019/2088) and the SFDR Delegated Regulation (Commission Delegated Regulation (EU) 2022/1288)**

6 November 2025

- **UK AML/CTF Supervision Reform – Duties, Powers & Accountability**
- **Commission Notice on the interpretation and implementation of certain legal provisions of the European Green Bond Regulation (C/2025/5885) - FAQs**

7 November 2025

- **Leaked draft of SFDR 2.0 - Proposals**

10 November 2025

- **Commission Delegated Regulation (EU) 2025/1416 – CSRD Disclosure Deferral**

14 November 2025

- **The COP30 Taxonomy Roadmap Initiative Progress Report was published**
- **EBA published Q&A regarding DORA - Definition of ICT Services**

19 November 2025

- **The European Commission published Digital Omnibus Regulation Proposal**

20 November 2025

- **The European Commission published the Proposal COM(2025) 841 final (20 November 2025) that revises the Sustainable Finance Disclosure Regulation (SFDR)**

21 November 2025

- **The UK Government publishes draft Statutory Instrument on T+1 settlement**
- **The European Commission published Consolidated FAQs on the implementation of Council Regulation No 833/2014 and Council Regulation No 269/2014**

25 November 2025

- **EBA publishes reporting framework updates**

27 November 2025

- **The FCA published Policy Statement PS25/16**

DETAILED UPDATES

SCOPE	LEVEL OF IMPACT	APPLICABLE TO
EBA advises the European Commission on foundations of new AML/CTF regime		
SUMMARY/ MAIN POINTS		
Key Points: • Direct Supervision; • Risk-Based Selection; • Scope of Supervision: Initially focus on financial sector entities with gradual expansion to include non-financial entities as the authority matures; • Powers: the authority should have strong supervisory powers (including the ability to impose sanctions) and be able to conduct on-site inspections and request information directly from supervised entities; • Coordination Role: The new authority should act as a central hub for coordination and information-sharing among national AML/CFT supervisors, ensuring consistent application of EU rules; • Governance and Independence: operational independence, transparent governance, and adequate resourcing for the authority to function effectively.		
LINK	The EBA advises the European Commission on the foundations of the new anti-money laundering/countering the financing of terrorism regime European Banking Authority	
ENTRY INTO APPLICATION	N/A	

SCOPE	LEVEL OF IMPACT	APPLICABLE TO
EBA Response to the European Commission's Call for Advice on Six AMLA Mandates		
SUMMARY/ MAIN POINTS		
Main Points: • Methodology for Selecting Supervised Entities: EBA proposes a risk-based approach combining inherent risk and impact factors to identify financial institutions for direct AMLA supervision; • Supervisory Methodology: Recommends a harmonized, robust, and proportionate supervisory framework aligned with existing EU AML/CFT standards; • Supervisory Planning: Suggests a multi-year planning cycle with annual updates, prioritizing high-risk sectors and entities; • Information Exchange and Cooperation: Emphasizes structured cooperation between AMLA, national competent authorities (NCAs), and other EU bodies, including joint supervisory teams; • Data Collection and Analysis: Advocates for a centralized data hub within AMLA to support risk assessments and supervisory decisions; • Whistleblower Protection: Recommends clear procedures and safeguards to encourage and protect whistleblowers reporting AML/CFT breaches.		
LINK	EBA response to EC CfA on six AMLA mandates 2025 10 30.pdf	
ENTRY INTO APPLICATION	N/A	

SCOPE	LEVEL OF IMPACT	APPLICABLE TO
The FCA and Bank of England finalized guidance on UK EMIR Article 9 reporting via Q&As		
SUMMARY/ MAIN POINTS		
Topics Covered in Final Q&As: Reconciliations; Errors and omissions; Derivative identifiers; Actions and events; Venues and exchange-traded derivatives; Margin and collateral; Clearing; Position-level reporting; Asset class and product-specific guidance; UK EMIR Validation Rules. Validation Rules Update: - Finalized changes to validation rules effective 30 September 2024. - Minor schema correction for field 1.10 (Country of counterparty 2) to prevent report rejection. Firms should now review and incorporate the final Q&As into their UK EMIR reporting processes.		
LINK	Changes to UK EMIR reporting requirements: draft questions and answers FCA	
ENTRY INTO APPLICATION	Already in application	

SCOPE	LEVEL OF IMPACT	APPLICABLE TO
Commission Delegated Regulation C(2025)3103 – Market Data Transparency under MiFIR (technical standards)		
SUMMARY/ MAIN POINTS		
Key Points: • Pricing Transparency: Requires trading venues and Approved Publication Arrangements (APAs) to ensure market data is offered at prices that are reasonable, cost-based, and non-discriminatory. • Cost Methodology: Introduces a standardized cost methodology to calculate fees for market data, ensuring alignment with actual costs and a reasonable margin. • Data Disaggregation: Obligates data providers to offer disaggregated data (e.g., by asset class, venue, or instrument type) to promote accessibility and competition. • Delayed Data Access: Reinforces the requirement to provide market data free of charge after a 15-minute delay. • Transparency Obligations: Mandates clear disclosure of pricing policies, fee structures, and terms of use for market data.		
LINK	Register of Commission Documents - C(2025)3103	
ENTRY INTO APPLICATION	Not applicable yet	

SCOPE	LEVEL OF IMPACT	APPLICABLE TO
Consolidated questions and answers (Q&A) on the SFDR (Regulation (EU) 2019/2088) and the SFDR Delegated Regulation (Commission Delegated Regulation (EU) 2022/1288)		
SUMMARY/ MAIN POINTS		
Key Points: • <u>Definition of Sustainable Investment</u>: Clarifies how to assess sustainability contributions, DNSH (Do No Significant Harm), and good governance; • <u>Principal Adverse Impact (PAI) Disclosures</u>: Guidance on current value calculations, data gaps, and treatment of derivatives; • <u>Financial Product Disclosures</u>: Clarifies Article 8 and 9 product disclosures, including use of estimates, benchmarks, and Taxonomy alignment; • <u>Multi-Option Products (MOPs)</u>: Explains how to apply SFDR disclosures to MOPs and underlying investment options; • <u>Taxonomy-Aligned Investments</u>: Details on how to disclose alignment with the EU Taxonomy, including treatment of sovereign exposures.		
LINK	JC 2023 18 Consolidated Q&As on the SFDR	
ENTRY INTO APPLICATION	Already in application	

SCOPE	LEVEL OF IMPACT	APPLICABLE TO
UK AML/CTF Supervision Reform – Duties, Powers & Accountability		
SUMMARY/ MAIN POINTS		
The objective of this consultation is to gather feedback on proposed legislative changes that would enable the FCA to become the single AML/CTF supervisor. Key Proposals: Registration & Gatekeeping: FCA to register all in-scope firms and conduct fit-and-proper checks; Proposal to maintain a public register of supervised firms. Risk-Based Supervision: Use of risk profiles, targeted inspections, and intelligence-led interventions; Supervisory Powers: Enhanced powers to gather information, issue directions, appoint skilled persons, and conduct inspections; Enforcement & Sanctions: FCA to impose civil penalties, suspensions, public censures, and initiate criminal proceedings for MLR breaches; Accountability & Appeals: FCA to remain operationally independent but accountable to HM Treasury and Parliament.		
LINK	Anti-Money Laundering and Counter-Terrorist Financing Supervision Reform: Duties, Powers, and Accountability Consultation - GOV.UK	
ENTRY INTO APPLICATION	N/A	

SCOPE	LEVEL OF IMPACT	APPLICABLE TO
Commission Notice on the interpretation and implementation of certain legal provisions of the European Green Bond Regulation (C/2025/5885) - FAQs		
SUMMARY/ MAIN POINTS		
It is applicable to European Green Bonds (EuGBs) and optional disclosures for sustainability-linked bonds. Key Points: • Use of the “European Green Bond” Label: Only bonds fully compliant with Title II of the EuGB Regulation can be designated as EuGBs, however, existing green bonds can be converted into EuGBs if issuers update prospectuses, complete factsheets, and obtain external reviews; • EU Taxonomy Alignment: Proceeds must align with the EU Taxonomy Regulation; Sovereigns can allocate proceeds to subsidies, but only if earmarked for Taxonomy-aligned purposes (e.g., solar panels, heat pumps); • Disclosure & Reporting: Issuers must use standard templates (Annexes I–III) for factsheets, allocation reports, and impact reports; External reviewers must follow Annex IV requirements; • Supervisory & Enforcement: Competent authorities (including Luxembourg’s CSSF) can impose administrative penalties for breaches.		
LINK	COMMISSION NOTICE on the interpretation and implementation of certain legal provisions of the European Green Bond Regulation	
ENTRY INTO APPLICATION	N/A	

SCOPE	LEVEL OF IMPACT	APPLICABLE TO
Leaked draft of SFDR 2.0 - Proposals		
SUMMARY/ MAIN POINTS		
A leaked draft of the European Commission’s SFDR 2.0 proposal outlines reforms to the SFDR. Here are the key proposals: • New Product Categories: Replaces Articles 6, 8, and 9 with five new categories; • Quantitative Thresholds: Each category includes minimum investment thresholds and excluded investments. Exemptions & Transitional Provisions: • Professional-Only AIFs: May opt out of product categorization, though still subject to general anti-greenwashing rules; • Closed-Ended Funds: Fully raised and no longer marketed funds may fall outside SFDR 2.0 entirely; • Retail-Facing Funds: No transitional relief; must comply upon entry into force, pending delegated acts. Deleted Requirements: • Article 2(17) and the “Do No Significant Harm” principle removed; • Entity-Level PAI Reporting: Scrapped, along with sustainability-linked remuneration disclosures; • Taxonomy Reporting: Articles 5–7 of the Taxonomy Regulation repealed; no mandatory alignment disclosures under SFDR 2.0.		
LINK	Draft SFDR 2.0 proposals briefing - 7 Nov 2025	
ENTRY INTO APPLICATION	Not applicable yet	

SCOPE	LEVEL OF IMPACT	APPLICABLE TO
Commission Delegated Regulation (EU) 2025/1416 – CSRD Disclosure Deferral		
SUMMARY/ MAIN POINTS		
It amends Delegated Regulation (EU) 2023/2772 in order to postpone the application of specific sustainability disclosure requirements for certain undertakings under the CSRD framework. Key Points: • Extended Phase-In Periods: Undertakings with >750 employees can now benefit from 3-year exemptions for several challenging disclosure areas; • Qualitative Disclosures Permitted: For certain financial effect disclosures (e.g., ESRS E1-9, E2-6), qualitative reporting is allowed if quantitative data is impracticable; • Materiality Assessment Still Required: Even when exemptions apply, undertakings must assess and disclose whether the topic is material.		
LINK	Commission Delegated Regulation (EU) 2025/1416 of 11 July 2025 amending Delegated Regulation (EU) 2023/2772 as regards the postponement of the date of application of the disclosure requirements for certain undertakings	
ENTRY INTO APPLICATION	Already in application	

SCOPE	LEVEL OF IMPACT	APPLICABLE TO
The COP30 Taxonomy Roadmap Initiative Progress Report was published		
SUMMARY/ MAIN POINTS		
Key points for EU and Luxembourg: • EU Taxonomy as reference point: The EU framework remains a leading model, but interoperability efforts mean Luxembourg funds must monitor how EU rules interact with other jurisdictions; • Cross-border investments: Luxembourg funds investing in non-EU green assets will benefit from clearer comparability and reduced risk of “greenwashing”; • Disclosure alignment: Funds may need to adapt reporting to reflect global interoperability standards, not just EU templates; • Regulatory convergence: CSSF supervision will increasingly consider how Luxembourg funds classify sustainable investments in line with both EU and international taxonomy frameworks.		
LINK	Advancing Sustainable Finance Taxonomies and Interoperability	
ENTRY INTO APPLICATION	N/A	

SCOPE	LEVEL OF IMPACT	APPLICABLE TO
EBA publishes Q&A regarding DORA - Definition of ICT Services		
SUMMARY/ MAIN POINTS		
Question: What is the correct reading of Article 3(21) and Recital 63, Article 2 and Article 58(2) of Regulation (EU) No. (EU) 2022/2554 (DORA Reg) in combination with the COM/2023/0365 European Commission Report on the review of Directive 2015/2366/EU? Answer: In accordance with Article 31(8) (ii) of DORA, ICT third-party service providers that are subject to oversight frameworks established for the purposes of supporting the tasks referred to in Article 127(2) of the Treaty on the Functioning of the European Union, shall not fall within the scope of the oversight framework of critical ICT third-party service providers under DORA.		
LINK	2024_7290 Definition and scope of ICT services European Banking Authority	
ENTRY INTO APPLICATION	N/A	

SCOPE	LEVEL OF IMPACT	APPLICABLE TO
The European Commission published Digital Omnibus Regulation Proposal		
SUMMARY/ MAIN POINTS		
Key Points: • Introduction of EU single-entry point for all major digital/cyber/data incident reporting (DORA, NIS2, GDPR); • Clarification of personal data definition with reduced scope for non-identifiable datasets; • GDPR amendments: longer notification window; reduced obligations for low-risk processing; harmonised DPIA lists; • Integration of cookie/ePrivacy obligations into GDPR; future requirement to respect machine-readable consent; • Consolidation of digital data legislation into a single Data Act; repeal of Data Governance Act, Free Flow Regulation and Open Data Directive; • Stronger trade secret protections for data-sharing, especially regarding third-country risks; • Public sector data reuse harmonised under a single EU framework, with differential conditions for large enterprises.		
LINK	Digital Omnibus Regulation Proposal Shaping Europe's digital future	
ENTRY INTO APPLICATION	N/A	

SCOPE	LEVEL OF IMPACT	APPLICABLE TO
The UK Government publishes draft Statutory Instrument on T+1 settlement		
SUMMARY/ MAIN POINTS		
The draft statutory instrument amends the UK CSDR, requiring settlement “no later than the first business day after trading”. Key Points: Asset managers and funds: • Faster settlement reduces risk but requires earlier trade affirmation and funding; • Luxembourg and other EU funds trading UK securities must adjust to tighter cut-offs. Banks and custodians: • Must ensure liquidity and securities availability within one business day; • FX settlement cycles may need re-engineering to avoid mismatches. Investors: • Benefit from quicker access to cash and securities; • Reduced systemic risk enhances confidence in UK markets.		
LINK	Government publishes draft Statutory Instrument on T+1 settlement FCA	
ENTRY INTO APPLICATION	Not applicable yet (expected in October 2027)	

SCOPE	LEVEL OF IMPACT	APPLICABLE TO
The European Commission published the Proposal COM(2025) 841 final (20 November 2025) that revises the Sustainable Finance Disclosure Regulation (SFDR)		
SUMMARY/ MAIN POINTS		
Key Points: Simplification of disclosures: - Entity-level disclosures (e.g., principal adverse impacts, remuneration policies) are deleted; - Product-level disclosures are streamlined, with fewer indicators and simpler templates. New categorisation of financial products with introduction of three categories: - Sustainable products: investments already meeting high sustainability standards; - Transition products: investment products that are on a pathway to becoming more sustainable, but haven't reached the highest sustainability standards yet; - ESG basic products: integrating ESG factors beyond risk management.		
LINK	CP25/32: Improving the UK transaction reporting regime FCA	
ENTRY INTO APPLICATION	N/A	

SCOPE	LEVEL OF IMPACT	APPLICABLE TO
The European Commission published Consolidated FAQs on the implementation of Council Regulation No 833/2014 and Council Regulation No 269/2014		
SUMMARY/ MAIN POINTS		
Key Points on EU Sanctions on Russia: • Investment Ban: No direct/indirect investments in Russian entities or sectors under EU sanctions; • Fund Manager Duties: Screen portfolios/counterparties against EU sanctions list; check beneficial ownership; • Due Diligence: Maintain risk-based monitoring to detect circumvention (e.g., offshore structures); • Asset Freeze: Units held by sanctioned persons must be blocked (no transactions, redemptions, or payouts); • Financing Restrictions: No new subscriptions or capital injections into Russian-linked funds; • CSD Services: EU custodians cannot service Russian nationals/entities; funds must ensure compliance; • Crypto Coverage: Sanctions extend to crypto-assets; avoid Russian exchanges/wallets; • Reporting: Blocked assets must be reported to national authorities; divestments disclosed.		
LINK	Consolidated version - Frequently asked questions concerning sanctions adopted following Russia's military aggression against Ukraine and Belarus' involvement in it.	
ENTRY INTO APPLICATION	Already in application	

SCOPE	LEVEL OF IMPACT	APPLICABLE TO
EBA publishes reporting framework updates		
SUMMARY/ MAIN POINTS		
Key Points: Framework 4.3: - Introduces ESG reporting modules (taxonomy alignment, sustainability risks, disclosures); - Adds third-country branch reporting obligations. Liquidity Management: - IFMs managing open-ended AIFs/UCITS must adopt at least two liquidity management tools (LMTs); - Specific notification requirements to regulators.		
LINK	Reporting frameworks European Banking Authority	
ENTRY INTO APPLICATION	Already in application (except for framework 4.3 which is expected to enter in force in 2026)	

SCOPE	LEVEL OF IMPACT	APPLICABLE TO
The FCA published Policy Statement PS25/16		
SUMMARY/ MAIN POINTS		
Key Points: Permanent exemption for equity options • Single-stock equity options and index options are permanently exempt from initial and variation margin requirements; • Removes uncertainty for funds trading listed equity derivatives. Threshold relief for legacy trades • Initial margin no longer required for outstanding legacy transactions if one counterparty's aggregate notional is below the €8bn threshold; • Any initial margin already collected on such trades must be returned. Cross-border alignment • UK firms trading with non-UK counterparties can apply the threshold assessment periods and application dates of the non-UK jurisdiction; • Prevents mismatches in compliance timelines across borders.		
LINK	PS25/16: Margin requirements for non-centrally cleared derivatives: Amendments to BTS 2016/2251 FCA	
ENTRY INTO APPLICATION	Already in application	

SCOPE	LEVEL OF IMPACT	APPLICABLE TO
SANCTIONS		 

There was a serious of updates regarding Regulations concerning sanctions and restrictive measures:

- [Notice Iran DDMMYY.docx](#)
- [Notice Counter Terrorism Domestic 061125.pdf](#)
- [Commission Implementing Regulation \(EU\) 2025/2276 of 5 November 2025 amending for the 352nd time Council Regulation \(EC\) No 881/2002 imposing certain specific restrictive measures directed against certain persons and entities associated with the ISIL \(Da'esh\) and Al-Qaida organisations](#)
- [Notice for the attention of the persons covered by the restrictive measures provided for in Council Decision \(CFSP\) 2024/254 and in Council Regulation \(EU\) 2024/287 concerning restrictive measures in view of the situation in Guatemala](#)
- [Notice for the attention of certain persons subject to the restrictive measures provided for in Annex I to Council Decision \(CFSP\) 2017/2074 and in Annex IV to Council Regulation \(EU\) 2017/2063 concerning restrictive measures in view of the situation in Venezuela](#)
- [Notice for the attention of Babbar Khalsa, Hizbul Mujahideen \(HM\) and Khalistan Zindabad Force \(KZF\), included on the list of persons, groups and entities covered by Council Common Position 2001/931/CFSP on the application of specific measures to combat terrorism and Council Regulation \(EC\) No 2580/2001 on specific restrictive measures directed against certain persons and entities with a view to combating terrorism](#)
- [EU trade sanctions in response to situation in Ukraine - DETE](#)
- [Statement by the High Representative on behalf of the EU on the alignment of certain countries concerning restrictive measures in view of the situation in Belarus and the involvement of Belarus in the Russian aggression against Ukraine - Consilium](#)
- [Statement by the High Representative on behalf of the EU on the alignment of certain countries concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine - Consilium](#)
- [Commission Implementing Regulation \(EU\) 2025/2327 of 12 November 2025 amending for the 353rd time Council Regulation \(EC\) No 881/2002 imposing certain specific restrictive measures directed against certain persons and entities associated with the ISIL \(Da'esh\) and Al-Qaida organisations](#)
- [Russia financial sanctions: list of asset-freeze targets - GOV.UK](#)
- [Notice Russia DDMMYY.docx](#)
- [United Nations Security Council Consolidated List | Security Council](#)

- [DOFdoclaid191125_93614.pdf](#)
- [Council Implementing Regulation \(EU\) 2025/2356 of 20 November 2025 implementing Regulation \(EU\) 2024/1485 concerning restrictive measures in view of the situation in Russia](#)
- [Council Implementing Regulation \(EU\) 2025/2368 of 20 November 2025 implementing Regulation \(EU\) 2023/2147 concerning restrictive measures in view of activities undermining the stability and political transition of Sudan](#)
- [Council Decision \(CFSP\) 2025/2369 of 20 November 2025 amending Decision \(CFSP\) 2023/2135 concerning restrictive measures in view of activities undermining the stability and political transition of Sudan](#)
- [Council Decision \(CFSP\) 2025/2357 of 20 November 2025 amending Decision \(CFSP\) 2024/1484 concerning restrictive measures in view of the situation in Russia](#)
- [Council Implementing Regulation \(EU\) 2025/2396 of 24 November 2025 implementing Regulation \(EU\) 2019/1890 concerning restrictive measures in view of Türkiye's unauthorised drilling activities in the Eastern Mediterranean](#)
- [Council Decision \(CFSP\) 2025/2398 of 24 November 2025 amending Decision \(CFSP\) 2016/1693 concerning restrictive measures against ISIL \(Da'esh\) and Al-Qaeda and persons, groups, undertakings and entities associated with them](#)
- [Council Decision \(CFSP\) 2025/2395 of 24 November 2025 amending Decision \(CFSP\) 2019/1894 concerning restrictive measures in view of Türkiye's unauthorised drilling activities in the Eastern Mediterranean](#)
- [Notice for the attention of certain entities subject to the restrictive measures provided for in Council Decision 2014/512/CFSP and Council Regulation \(EU\) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine](#)

Updated sanctions list

- [EU Sanctions Map / Entities | EU sanctions tracker](#)
- [The UK Sanctions List - GOV.UK](#)

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