



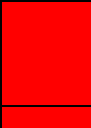
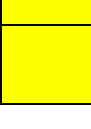
ONE COMPASS

Our monthly regulatory update

REGULATORY CLIENT UPDATE / DECEMBER 2025

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

NEW PUBLICATIONS	
Council & European Parliament Reach Deal on New EU Law to Step Up Fight Against Corruption	
The FCA published Policy Statement 25/17 regarding the SI regime for bonds and derivatives including Discussion Paper on equity markets	
FCA Update – UK Transition to T+1 Settlement	
Draft Commission Notice – FAQs on Omnibus Delegated Act	
CSSF Circular 25/903 – ICT & Cybersecurity Risk Management	

PRIORITIES	
Commission Implementing Regulation (EU) 2025/2392 – Categories of Important and Critical Products under the Cyber Resilience Act	
The EU Commission published near-final RTS detailing characteristics and operational requirements for LMTs under AIFMD 2.0	
ESAs Consolidated PRIIPs Q&A – December 2025 Update	
CSSF Circular 25/901 – AML/CFT & Governance Updates	
FAQs – EU Sanctions on Russia	
FAQs – UK Financial Sanctions	

TIMELINE

28 November 2025	• The FCA published Policy Statement 25/17 regarding the SI regime for bonds and derivatives including Discussion Paper on equity markets
1 December 2025	• Commission Implementing Regulation (EU) 2025/2392 – Categories of Important and Critical Products under the Cyber Resilience Act • FCA CP25/34 – ESG Ratings: Proposed Approach to Regulation
2 December 2025	• ESMA Common Supervisory Action on MiFID II Conflicts of Interest in Product Distribution • Council & European Parliament Reach Deal on New EU Law to Step Up Fight Against Corruption
3 December 2025	• The EU Commission published near-final RTS detailing characteristics and operational requirements for LMTs under AIFMD 2.0 • Cyber Resilience Act – Implementation FAQs (European Commission Guidance)

5 December 2025

- **ESAs Consolidated PRIIPs Q&A – December 2025 Update**

9 December 2025

- **FCA CP25/38 – Fund Liquidity Risk Management**
- **ECB Banking Supervision – FAQs on ESG Risks**

11 December 2025

- **ECB Governing Council Endorses Recommendations to Simplify EU Banking Rules**

16 December 2025

- **Corporate Sustainability Simplification Proposal – updates**
- **PRA Rulebook Update – Insurance Special Purpose Vehicles**

17 December 2025

- **FCA Update – UK Transition to T+1 Settlement**
- **Draft Commission Notice – FAQs on Omnibus Delegated Act**
- **FAQs – EU Sanctions on Russia**
- **FCA ESG Sourcebook Update – Sustainability Disclosure Requirements**

19 December 2025

- **CSSF Circular 25/901 – AML/CFT & Governance Updates**
- **UK Financial Sanctions FAQs**

22 December 2025

- **ESMA Market Report – EU Prospectuses 2025**

23 December 2025

- **CSSF Circular 25/903 – ICT & Cybersecurity Risk Management**

31 December 2025

- **ECB FAQs – Supervisory Framework under Single Supervisory Mechanism (SSM)**

DETAILED UPDATES

SCOPE	LEVEL OF IMPACT	APPLICABLE TO
The FCA published Policy Statement 25/17 regarding the SI regime for bonds and derivatives including Discussion Paper on equity markets		
SUMMARY/ MAIN POINTS		
Key Points: • Abolition of SI Regime for Non-Equities: No more pre-trade transparency obligations for bonds and derivatives; firms will be removed from FCA's SI register automatically. • Venue Restrictions Lifted: ○ Investment firms that are SIs can now operate an Organised Trading Facility (OTF) in the same legal entity. ○ Matched Principal Trading (MPT) allowed on Multilateral Trading Facilities (MTFs) if firms have proper permissions and comply with conduct rules. • Reference Price Waiver (RPW) Broadened: Trading venues can source reference prices from a wider set of venues, provided prices are reliable and widely published.		
LINK	PS25/17: The SI regime for bonds and derivatives including Discussion Paper on equity markets FCA	
ENTRY INTO APPLICATION	Already in application 1st December 2025: Removal of SI regime for non-equities; 30 March 2026: Changes to equity transparency waivers and lifting venue restrictions.	

SCOPE	LEVEL OF IMPACT	APPLICABLE TO
Commission Implementing Regulation (EU) 2025/2392 – Categories of Important and Critical Products under the Cyber Resilience Act		
SUMMARY/ MAIN POINTS		
Defines technical criteria for classifying “important” and “critical” products with digital elements under the Cyber Resilience Act. Main Points: Compliance • Important Class I & II: Self-assessment if harmonised standards apply; • Critical products: Mandatory third-party conformity assessment or EU cybersecurity certification. Objective • Enhance EU-wide cyber resilience and security standards.		
LINK	Commission Implementing Regulation (EU) 2025/2392 of 28 November 2025 on the technical description of the categories of important and critical products with digital elements pursuant to Regulation (EU) 2024/2847 of the European Parliament and of the Council	
ENTRY INTO APPLICATION	Already in application	

SCOPE	LEVEL OF IMPACT	APPLICABLE TO
FCA CP25/34 – ESG Ratings: Proposed Approach to Regulation		
SUMMARY/ MAIN POINTS		
The FCA is consulting on a new regulatory framework for ESG ratings providers to improve transparency, reliability, and comparability of ESG ratings. Key Points: Scope: ESG ratings will become a regulated activity in the UK; firms providing ESG ratings must obtain FCA authorisation. Core Objectives: • Increase transparency through minimum disclosure requirements for methodologies, data sources, and objectives; • Strengthen governance, systems, and controls; • Manage conflicts of interest effectively; • Set clear expectations for stakeholder engagement and complaints handling.		
LINK	CP25/34: ESG ratings: proposed approach to regulation FCA	
ENTRY INTO APPLICATION	N/A	

SCOPE	LEVEL OF IMPACT	APPLICABLE TO
ESMA Common Supervisory Action on MiFID II Conflicts of Interest in Product Distribution		
SUMMARY/ MAIN POINTS		
ESMA/NCA 2026 supervisory sweep will test firms' MiFID II compliance on conflicts of interest in retail distribution, with focus on staff remuneration & inducements, digital distribution influences, governance of profit vs client interest. Key Points: • Map CSA themes to the policies, controls, MI & audit trail (remuneration/inducements, digital channels, governance challenge); • Conduct pre-CSA readiness review; update distributor due-diligence questionnaires to capture digital influence and inducements; • Prepare evidence packs (board/committee minutes, remuneration testing, product governance decisions, conflict registers).		
LINK	ESMA to launch Common Supervisory Action on MiFID II conflicts of interest requirements	
ENTRY INTO APPLICATION	Not applicable yet	

SCOPE	LEVEL OF IMPACT	APPLICABLE TO
Council & European Parliament Reach Deal on New EU Law to Step Up Fight Against Corruption		
SUMMARY/ MAIN POINTS		
The EU has agreed on its first comprehensive anti-corruption directive to harmonise criminal law across Member States. Key points: • Criminal Offences Harmonised: Bribery (public & private), misappropriation, trading in influence, obstruction of justice, illicit enrichment, concealment, and serious unlawful acts by public officials. • Penalties: ◦ Individuals: imprisonment (3–5 years), fines, disqualification, exclusion from public funds; ◦ Legal entities: fines of 3–5% global turnover or €24–40 million, plus exclusion from public procurement. • Preventive Measures: ◦ National anti-corruption strategies and independent bodies; ◦ Transparency and awareness initiatives. • Jurisdiction: Mandatory prosecution for offences committed on territory or by nationals; optional extension abroad.		
LINK	Council and European Parliament reach deal on new EU law to step up fight against corruption - Consilium	
ENTRY INTO APPLICATION	Not applicable yet (due to transposition period, the full implementation is expected by 2028)	

SCOPE	LEVEL OF IMPACT	APPLICABLE TO
The EU Commission published near-final RTS detailing characteristics and operational requirements for LMTs under AIFMD 2.0		
SUMMARY/ MAIN POINTS		
It is applicable to AIFMs managing open-ended AIFs. Key Points: Mandatory Liquidity Framework: • Continuous liquidity monitoring and stress testing; • Escalation procedures for liquidity shortages. Defined Tools: Swing Pricing, Anti-Dilution Levies, Redemption Gates, Side Pockets, Suspension of Redemptions. Governance & Disclosure: • Immediate investor notification when activating LMTs; • Reporting obligations to regulators.		
LINK	aifmd-2-0--additional-detail-on-liquidity-management-tools.pdf	
ENTRY INTO APPLICATION	Not applicable yet (16 April 2026)	

SCOPE	LEVEL OF IMPACT	APPLICABLE TO
Cyber Resilience Act – Implementation FAQs (European Commission Guidance)		
SUMMARY/ MAIN POINTS		
Key points: • Core Obligations: ○ Security by design and default; ○ Vulnerability handling and reporting obligations; ○ Compliance with essential cybersecurity requirements throughout the product lifecycle. • Certification & Conformity: ○ Self-assessment for lower-risk products; third-party conformity assessment for critical products. • Timeline: ○ CRA entered into force in January 2025; ○ Main obligations apply from 2027, with transitional arrangements for products already on the market. • Relationship with Other Frameworks: CRA complements DORA and EU Cybersecurity Certification schemes, reinforcing ICT resilience across sectors.		
LINK	Cyber Resilience Act implementation - Frequently asked questions Shaping Europe's digital future	
ENTRY INTO APPLICATION	N/A	

SCOPE	LEVEL OF IMPACT	APPLICABLE TO
ESAs Consolidated PRIIPs Q&A – December 2025 Update		
SUMMARY/ MAIN POINTS		
Key points: • Performance Scenarios: ○ Clarification on treatment of life annuities in minimum scenario calculations (only guaranteed amounts should be reflected); ○ Confirmation that monthly data must be used for performance scenario calculations even if daily NAV data is available. • Market Risk Assessment: ○ Guidance on classification of products with recurring premiums (remain Category 2 if linear pay-off, regardless of payment frequency). • Multi-Option Products (MOPs): ○ Additional detail on how to present risk and cost information for products offering both single and recurring premium options (separate KIDs required). • Benchmark vs Proxy: ○ Reinforced distinction between benchmarks (explicitly named index) and proxies for performance scenario modelling.		
LINK	JC 2023 22 Consolidated Q&As on the PRIIPs Key Information Document (KID)	
ENTRY INTO APPLICATION	Already in application	

SCOPE	LEVEL OF IMPACT	APPLICABLE TO
FCA CP25/38 – Fund Liquidity Risk Management		
SUMMARY/ MAIN POINTS		
Key points: • Liquidity Stress Testing: ○ Mandatory stress testing for all authorised funds, with minimum frequency and scenario requirements; ○ Enhanced governance and documentation of stress testing outcomes. • Liquidity Management Tools (LMTs): ○ Clear expectations for the use of swing pricing, anti-dilution levies, and redemption gates; ○ Requirement for managers to maintain operational readiness for applying LMTs during market stress. • Disclosure: ○ Improved investor disclosures on liquidity risk and available LMTs in fund documentation. • Governance: ○ Strengthened board oversight and escalation procedures for liquidity events. • Alignment: ○ Consistent with international standards (IOSCO) and complements AIFMD 2.0 reforms in the EU.		
LINK	CP25/38: Enhancing fund liquidity risk management FCA	
ENTRY INTO APPLICATION	N/A	

SCOPE	LEVEL OF IMPACT	APPLICABLE TO
ECB Banking Supervision – FAQs on ESG Risks		
SUMMARY/ MAIN POINTS		
The ECB's FAQs clarify supervisory expectations on integrating environmental, social, and governance (ESG) risks into banks' strategies, governance, and risk management frameworks. Key points: • Materiality Assessment: Institutions must assess ESG risks' impact on credit, market, and operational risk profiles; • Governance: Boards should ensure ESG risks are embedded in decision-making and risk appetite frameworks; • Risk Management: ESG factors should be integrated into ICAAP and stress testing; climate-related risks require scenario analysis; • Disclosure: Institutions should provide transparent ESG risk disclosures aligned with EU regulations (SFDR, Taxonomy).		
LINK	FAQs on the application of ESG disclosure requirements following the issuance of the EBAs no-action letter	
ENTRY INTO APPLICATION	N/A	

SCOPE	LEVEL OF IMPACT	APPLICABLE TO
ECB Governing Council Endorses Recommendations to Simplify EU Banking Rules		
SUMMARY/ MAIN POINTS		
The ECB announced support for proposals to simplify the EU prudential framework and strengthen financial integration. Key points: • Capital Requirements: Merge buffer layers into two categories (releasable and non-releasable) and streamline leverage ratio rules; • Proportionality: Expand simplified regimes for smaller banks to reduce compliance burden; • Governance & Harmonisation: Create a European governance mechanism for capital oversight and harmonise rules across Member States; • Financial Integration: Accelerate Banking Union and Savings & Investment Union to deepen cross-border capital markets.		
LINK	Digital Omnibus Regulation Proposal Shaping Europe's digital future	
ENTRY INTO APPLICATION	N/A	

SCOPE	LEVEL OF IMPACT	APPLICABLE TO
Corporate Sustainability Simplification Proposal - updates		
SUMMARY/ MAIN POINTS		
Objective: Reduce administrative burden while maintaining ESG objectives. Key points: • CSRD: ◦ Scope narrowed to very large companies ($\geq 1,000$ employees + financial thresholds); ◦ Simplified ESRS disclosures and digital tagging. • CSDDD: ◦ Focus on direct business partners only; ◦ Risk-based approach reinforced; lower assessment frequency. • Other tweaks: Taxonomy & CBAM alignment; audit directive clarifications.		
LINK	eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52025PC0081	
ENTRY INTO APPLICATION	N/A	

SCOPE	LEVEL OF IMPACT	APPLICABLE TO
PRA Rulebook Update – Insurance Special Purpose Vehicles		
SUMMARY/ MAIN POINTS		
Objective: Amend the Insurance Special Purpose Vehicle (ISPV) Part of the PRA Rulebook to clarify asset use under multiple risk transfer agreements. Key Points: • Asset allocation rules: ○ A UK ISPV may use assets from one risk transfer agreement to cover exposure under another only under strict conditions: ▪ Assets cannot simultaneously cover both agreements; ▪ Transactions must clearly define asset usage for each agreement; ▪ Assets must remain segregated and not co-mingled, except where there is a sole investor common to both agreements. • Operational safeguards: ○ ISPV must maintain effective arrangements to ensure compliance with segregation and risk coverage requirements.		
LINK	PRA RULEBOOK: SOLVENCY II FIRMS: INSURANCE SPECIAL PURPOSE VEHICLES INSTRUMENT (NO 2) 2025	
ENTRY INTO APPLICATION	Already in application	

SCOPE	LEVEL OF IMPACT	APPLICABLE TO
FCA Update – UK Transition to T+1 Settlement		
SUMMARY/ MAIN POINTS		
Objective: Move UK securities settlement from T+2 to T+1 by 11 October 2027, aligning with EU and global markets. Key Points: - Settlement cycle shortened: Trades in transferable securities on UK trading venues will settle one business day after trade date. - Government action: Draft Statutory Instrument published to amend UK CSDR; final legislation expected before 2027. FCA expectations: 2025: Firms must create project plans, budgets, and identify operational changes; 2026: Implement system/process changes, automate manual steps, standardise SSIs, and engage with custodians and vendors; 2027: Complete internal/external testing well ahead of October deadline.		
LINK	About T+1 settlement FCA	
ENTRY INTO APPLICATION	Not applicable yet (11 October 2027)	

SCOPE	LEVEL OF IMPACT	APPLICABLE TO
Draft Commission Notice – FAQs on Omnibus Delegated Act		
SUMMARY/ MAIN POINTS		
Key Points: • Taxonomy reporting simplifications: ○ Materiality thresholds for non-financial and financial undertakings (e.g., activities <10% of KPIs can be treated as non-material); ○ Option for financial undertakings to defer detailed KPI reporting until 31 Dec 2027 with a management report statement. • DNSH principle: Taxonomy-aligned activities deemed to meet DNSH under SFDR automatically. • Cross-framework alignment: ○ Guidance on using CSRD-level data for SFDR disclosures; ○ Clarifies “Sustainable Investment” definition under SFDR Article 2(17) and its link to Taxonomy technical screening criteria. • Reporting templates: Simplified templates with reduced datapoints; adjustments to KPIs for financial undertakings.		
LINK	Draft Commission Notice on the interpretation and implementation of certain legal provisions of the Disclosures Delegated Act under Article 8 of the EU Taxonomy Regulation, as amended by the Omnibus Delegated Act, on the reporting of Taxonomy-eligible and Taxonomy-aligned economic activities and assets (fourth notice)	
ENTRY INTO APPLICATION	Already in application	

SCOPE	LEVEL OF IMPACT	APPLICABLE TO
FAQs – EU Sanctions on Russia (Consolidated)		
SUMMARY/ MAIN POINTS		
Key Points: • Asset freeze obligations: ○ Scope of “funds” and “economic resources” includes crypto-assets and indirect holdings; ○ Clarifies treatment of securities held via intermediaries and omnibus accounts. • Prohibition on transactions: ○ Expanded guidance on dealings with entities indirectly owned by listed persons. ○ Rules for settlement and clearing involving sanctioned counterparties. • Financial services restrictions: ○ Clarifies application to investment funds, including portfolio management for sanctioned persons. ○ Guidance on derivatives and structured products referencing Russian underlyings. • Due diligence expectations: ○ Firms must implement enhanced screening for beneficial ownership and control chains. ○ Emphasis on ongoing monitoring and documentation of compliance steps.		
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
FCA ESG Sourcebook Update – Sustainability Disclosure Requirements		
SUMMARY/ MAIN POINTS		
Key Points: • Labelling regime introduced: ◦ Four labels: <i>Sustainable Focus</i>, <i>Sustainable Improvers</i>, <i>Sustainable Impact</i>, and <i>Mixed Goals</i>. • Naming and marketing rules: ◦ Restrictions on use of ESG-related terms for products without a label. ◦ Anti-greenwashing guidance embedded in ESG Sourcebook. • Entity-level disclosures: ◦ Annual sustainability report required for firms above threshold. ◦ Covers governance, resources, and approach to sustainability integration. • Product-level disclosures: ◦ Pre-contractual and ongoing disclosures aligned with SDR templates. ◦ Key sustainability metrics and objectives must be disclosed.		
LINK	64-2025-12-19.pdf	
ENTRY INTO APPLICATION	Not applicable yet	

SCOPE	LEVEL OF IMPACT	APPLICABLE TO
CSSF Circular 25/901 – AML/CFT & Governance Updates		 
SUMMARY/ MAIN POINTS		
Key Points: AML/CFT risk management: - Enhanced requirements for risk-based approach, including periodic review of risk assessments and documentation of mitigating measures. - Mandatory escalation procedures for high-risk clients and transactions. Governance obligations: - Clarifies roles and responsibilities of the RC and RR and requires formalisation of reporting lines and internal control frameworks. Outsourcing arrangements: - Additional guidance on AML/CFT oversight when functions are delegated to third parties. Record-keeping and reporting: - Specifies minimum retention periods for AML documentation.		
LINK	Circulaire CSSF 25/901	
ENTRY INTO APPLICATION	Already in application (with transitional period for implementation until 30 June 2026)	

SCOPE	LEVEL OF IMPACT	APPLICABLE TO
UK Financial Sanctions FAQs		
SUMMARY/ MAIN POINTS		
Key Points: Scope of asset freeze: • Applies to all funds and economic resources owned, held, or controlled by designated persons; • Includes indirect ownership and beneficial interest. Ownership and control tests: • Detailed explanation of the 50% rule and aggregated ownership; • Guidance on assessing control through voting rights or influence. Reporting obligations: • Firms must report frozen assets and attempted transactions to OFSI; • Clarifies timelines and format for reporting.		
LINK	UK Financial Sanctions FAQs - GOV.UK	
ENTRY INTO APPLICATION	Already in application	

SCOPE	LEVEL OF IMPACT	APPLICABLE TO
ESMA Market Report – EU Prospectuses 2025		
SUMMARY/ MAIN POINTS		
Key Points: Volume of prospectuses: - Total approved prospectuses in 2025 decreased slightly compared to 2024, reflecting market volatility and reduced IPO activity. Types of prospectuses: - Equity prospectuses accounted for the majority of approvals; debt prospectuses remained stable. - Growth in base prospectuses for debt issuance programmes. Passporting trends: - Continued decline in cross-border passporting, indicating fragmentation in capital markets. Review observations: - ESMA highlights common deficiencies in risk factor disclosures and ESG-related information.		
LINK	ESMA50-801628861-4422 Market report: EU securities prospectuses 2025	
ENTRY INTO APPLICATION	N/A	

SCOPE	LEVEL OF IMPACT	APPLICABLE TO
CSSF Circular 25/903 – ICT & Cybersecurity Risk Management		 
SUMMARY/ MAIN POINTS		
Key Points: ICT governance framework: • Mandatory designation of an ICT risk officer and clear reporting lines to senior management. • Enhanced board accountability for ICT strategy and resilience. Cybersecurity requirements: • Implementation of robust incident detection and response capabilities. • Obligatory reporting of major ICT incidents to CSSF within defined timelines. Outsourcing and third-party risk: • Stricter due diligence and contractual requirements for ICT service providers. • Obligation to maintain exit strategies and ensure data portability. Testing and resilience: • Regular penetration testing and scenario-based resilience exercises. • Documentation of recovery plans and business continuity measures.		
LINK	Circular CSSF 25/903 – CSSF	
ENTRY INTO APPLICATION	Already in application (with transitional period until 30 September 2026)	

SCOPE	LEVEL OF IMPACT	APPLICABLE TO
ECB FAQs – Supervisory Framework under Single Supervisory Mechanism (SSM)		
SUMMARY/ MAIN POINTS		
Key Points: Scope of supervision: - ECB directly supervises significant credit institutions; national competent authorities (NCAs) supervise less significant institutions under ECB oversight. Significance criteria: - Outlines thresholds for classification as “significant” (size, cross-border activity, systemic importance). Supervisory methodology: - Explains risk-based approach, Supervisory Review and Evaluation Process (SREP), and stress testing. Interaction with other frameworks: - Coordination with EU prudential rules (CRR/CRD), resolution authorities, and macroprudential measures.		
LINK	Frequently asked questions	
ENTRY INTO APPLICATION	N/A	

SCOPE	LEVEL OF IMPACT	APPLICABLE TO
SANCTIONS		 

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

- [Council Implementing Regulation \(EU\) 2025/2443 of 1 December 2025 implementing Regulation \(EU\) 2022/2309 concerning restrictive measures in view of the situation in Haiti](#)
- [Council Decision \(CFSP\) 2025/2436 of 1 December 2025 amending Decision \(CFSP\) 2017/1775 concerning restrictive measures in view of the situation in Mali](#)
- [Notice for the attention of the data subjects to whom the restrictive measures provided for in Council Decision \(CFSP\) 2017/1775 and Council Regulation \(EU\) 2017/1770 concerning restrictive measures in view of the situation in Mali apply](#)
- [Notice for the attention of the persons subject to the restrictive measures provided for in Council Decision \(CFSP\) 2017/1775 and in Council Regulation \(EU\) 2017/1770 concerning restrictive measures in view of the situation in Mali](#)
- [Council Decision \(CFSP\) 2025/2442 of 1 December 2025 amending Decision \(CFSP\) 2022/2319 concerning restrictive measures in view of the situation in Haiti](#)
- [Notice for the attention of the data subjects to whom the restrictive measures provided for in Council Decision \(CFSP\) 2022/2319, as amended by Council Decision \(CFSP\) 2025/2442, and Council Regulation \(EU\) 2022/2309, as implemented by Council Implementing Regulation \(EU\) 2025/2443, concerning restrictive measures in view of the situation in Haiti apply](#)
- [Notice for the attention of the individuals subject to the restrictive measures provided for in Council Decision \(CFSP\) 2022/2319, as amended by Council Decision \(CFSP\) 2025/2442, and Council Regulation \(EU\) 2022/2309, as implemented by Council Implementing Regulation \(EU\) 2025/2443, concerning restrictive measures in view of the situation in Haiti](#)
- [Corrigendum to Council Decision \(CFSP\) 2025/2032 of 23 October 2025 amending Decision 2014/512/CFSP concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine \(OJ L, 2025/2032, 23.10.2025\)](#)
- [Council Implementing Regulation \(EU\) 2025/2471 of 4 December 2025 implementing Regulation \(EU\) 2020/1998 concerning restrictive measures against serious human rights violations and abuses](#)

- [Notice for the attention of the data subjects to whom the restrictive measures provided for in Council Decision \(CFSP\) 2020/1999 and Council Regulation \(EU\) 2020/1998 concerning restrictive measures against serious human rights violations and abuses apply](#)
- [Council Implementing Regulation \(EU\) 2025/2471 of 4 December 2025 implementing Regulation \(EU\) 2020/1998 concerning restrictive measures against serious human rights violations and abuses](#)
- [Council Implementing Regulation \(EU\) 2025/2508 of 8 December 2025 implementing Regulation \(EC\) No 1183/2005 concerning restrictive measures in view of the situation in the Democratic Republic of the Congo](#)
- [Notice for the attention of the persons subject to the restrictive measures provided for in Council Decision 2011/72/CFSP and Council Regulation \(EU\) No 101/2011 concerning restrictive measures directed against certain persons, entities and bodies in view of the situation in Tunisia](#)
- [Iraq financial sanctions: list of asset-freeze targets - GOV.UK](#)
- [Notice Iraq 101225.pdf](#)
- [Council Regulation \(EU\) 2025/2600 of 12 December 2025 on emergency measures addressing the serious economic difficulties caused by Russia's actions in the context of the war of aggression against Ukraine](#)
- [Council Implementing Regulation \(EU\) 2025/2568 of 15 December 2025 implementing Regulation \(EU\) 2024/2642 concerning restrictive measures in view of Russia's destabilising activities](#)
- [Council Implementing Regulation \(EU\) 2025/2588 of 15 December 2025 implementing Regulation \(EU\) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine](#)
- [Council Implementing Regulation \(EU\) 2025/2567 of 15 December 2025 implementing Regulation \(EU\) 2022/2309 concerning restrictive measures in view of the situation in Haiti](#)
- [Council Decision \(CFSP\) 2025/2617 of 18 December 2025 amending Decision 2014/512/CFSP concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine](#)
- [Council Regulation \(EU\) 2025/2618 of 18 December 2025 amending Regulation \(EU\) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine](#)
- [Règlement d'exécution \(UE\) 2025/2656 de la Commission du 19 décembre 2025 modifiant le règlement \(CE\) no 1210/2003 du Conseil concernant certaines restrictions spécifiques applicables aux relations économiques et financières avec l'Iraq](#)
- [Notice Russia 191225.pdf](#)
- [Notice Syria 191225.pdf](#)
- [Consolidated version - Frequently asked questions concerning sanctions adopted following Russia's military aggression against Ukraine and Belarus' involvement in it.](#)
- [Council Decision \(CFSP\) 2025/2637 of 22 December 2025 amending Decision \(CFSP\) 2024/1484 concerning restrictive measures in view of the situation in Russia](#)
- [Council Decision \(CFSP\) 2025/2648 of 22 December 2025 amending Decision 2014/512/CFSP concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine](#)
- [Council Implementing Regulation \(EU\) 2025/2638 of 22 December 2025 implementing Regulation \(EU\) 2024/1485 concerning restrictive measures in view of the situation in Russia](#)

Updated sanctions list

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

For further information, please contact:

Tobias Ettlin

m: +352 691 111 931

tobias.ettlin@one-gs.com

Disclaimer: This regulatory update has been prepared for clients of ONE group solutions and its subsidiaries for informational purposes and is not intended to be relied upon as professional advice. Please visit: <https://www.one-gs.com/>