

FINANCIAL REGULATION WEEKLY BULLETIN

Major UK and European regulatory developments of interest to banks
insurers and reinsurers, asset managers and other market participants

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Slaughter and May
also produces a
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GENERAL //

1 EUROPEAN COMMISSION

- 1.1 Taxonomy Regulation - European Commission provides update on review of technical screening criteria - 25 June 2025** - The European Commission has updated its webpage on the review of technical screening criteria under Regulation (EU) 2020/852 on the establishment of a framework to facilitate sustainable investment (the Taxonomy Regulation). It notes that the next cut-off date for submissions to the stakeholder request mechanism is 15 September 2025. The mechanism (launched in October 2023) allows stakeholders to submit suggestions about new activities that could be included in the Taxonomy or on possible amendments to the technical screening criteria for existing activities, based on scientific or technical evidence.

The Commission intends to adopt a Delegated Act in Q2 2026.

[Updated webpage](#)

2 COUNCIL OF THE EUROPEAN UNION

- 2.1 Omnibus I simplification proposal - Council of EU agrees negotiating mandate - 24 June 2025** - The Council of the EU has announced that it has agreed its negotiating mandate on the European Commission's proposal for a Directive that would simplify the Corporate Sustainability Reporting Directive ((EU) 2022/2464) (CSRD) and the Corporate Sustainability Due Diligence Directive ((EU) 2024/1760) (CSDDD). The proposal forms part of the Commission's Omnibus I sustainability package, which it adopted on 26 February 2025.

The announcement highlights proposed changes to the Commission's original proposals. In particular, the Council proposes to further limit the scope of reporting requirements under the CSRD, subject to a review clause. The Council also proposes to increase the CSDDD application threshold and delay its transposition deadline by one more year to 26 July 2028. Once the European Parliament has adopted its negotiating mandate, the presidency can enter negotiations with the European Parliament with a view to reaching an agreement on a final text.

Click [here](#) for our briefing on the first in a series of 'omnibus' packages, aimed at streamlining the EU's sustainability and value chain due diligence legislation.

[Press release](#)

3 EUROPEAN PARLIAMENT

- 3.1 Savings and investments union reforms - ECON votes to adopt report - 24 June 2025** - The European Parliament's Committee on Economic and Monetary Affairs (ECON) has voted to adopt a report on facilitating the financing of investments and reforms to boost EU competitiveness and creating a capital markets union (CMU). A draft version of the report was published in March 2025, as reported previously in this Bulletin.

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The report follows up on the measures that were proposed in the Draghi report on the future of European competitiveness (published in September 2024). It calls for concrete measures to make financing more available and affordable (particularly for SMEs and innovative ventures). To achieve this, ECON wants, among other things, larger venture capital and growth funds, financed in part by transforming personal savings into investments. The report calls for the rapid completion of the banking union, the CMU and the savings and investment union.

The procedure file for the report indicates that the European Parliament will consider the report at its plenary session on 8 September 2025.

[Press release](#)

4 UK GOVERNMENT

- 4.1 UK's Modern Industrial Strategy - published by the UK government - 23 June 2025** - The UK government has published *The UK's Modern Industrial Strategy*, setting out a 10-year plan to increase investment in eight sectors (referred to as the IS-8), including financial services.

The strategy refers to a financial services sector plan, to be published on 15 July 2025 alongside the Chancellor's Mansion House speech. The plan will set out the conclusions of HM Treasury's review of the Financial Ombudsman Service and establish a bespoke financial services concierge service for international firms, among other things. The strategy also confirms that priority growth opportunities in the sector plan will be the wholesale services, capital markets, FinTech, insurance and reinsurance markets, and sustainable finance subsectors. It also notes that HM Treasury will consult in summer 2025 on consolidating the Payment Systems Regulator and its functions within the FCA.

[UK government policy paper: The UK's Modern Industrial Strategy \(CP 1337\)](#)

[Webpage](#)

- 4.2 Transition plan requirements - UK government consults - 26 June 2025** - The Department for Energy Security and Net Zero (DESNZ) has published a consultation on the introduction of requirements on climate-related transition, plans aligned with the 1.5°C goal of the Paris Agreement. The consultation considers whether to extend the scope of requirements beyond the manifesto commitment of requirements on financial institutions and FTSE 100 companies. It also invites views on use of the Transition Plan Taskforce (TPT) disclosure framework and of the UK Sustainability Reporting Standards (UK SRS).

The transition plan consultation is part of the first phase of three papers. The other consultations seek views on the exposure drafts of the UK SRS and on an oversight regime for assurance of sustainability-related financial disclosures. All three consultations close on 17 September 2025.

Separately, the environmental law charity ClientEarth has published a press release (on 24 June 2025) relating to a legal opinion on climate transition plans, prepared by Erskine Chambers. Among other things, the opinion (which can be obtained from ClientEarth) concludes that a

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regulatory requirement for companies to disclose a transition plan is not likely to result in “*materially heightened liability risk*” for companies or their directors.

[DESNZ consultation paper: Transition plan requirements consultation](#)

[Webpage](#)

[UK government press release](#)

[ClientEarth press release](#)

5 PRUDENTIAL REGULATION AUTHORITY

- 5.1 Secondary competitiveness and growth objective - PRA publishes second report - 26 June 2025** - The PRA has published its second report on how it is embedding its new secondary international competitiveness and growth objective (SCGO). This follows the House of Lords Financial Services Regulation Committee’s second report on the SCGO, as reported in last week’s Bulletin. The PRA intends to respond to the Committee in due course.

The report covers the PRA’s actions to advance the SCGO, covering the period from July 2024 to June 2025, including how it is embedding the SCGO in its internal operations, processes and decision-making. It also details the PRA’s actions to implement the recommendations made in July 2024 by the Bank of England’s Independent Evaluation Office.

[PRA report: Competitiveness and growth: the PRA's second report](#)

[Webpage](#)

6 FINANCIAL CONDUCT AUTHORITY

- 6.1 UK financial services sector - Speech delivered by FCA chief executive - 26 June 2025** - The FCA has published a speech by Nikhil Rath, FCA chief executive, at TheCityUK’s annual conference entitled *What kind of market do we want to be?*

Among other things, Rath refers to the publication of the government’s Modern Industrial Strategy (see item above) which envisages the UK being the world’s most innovative full-service financial centre by 2035. According to Rath, progress towards that goal depends on building consensus and coherence in the regulatory approach to risk. On the FCA’s proposals to do more to support growth, Rath refers to an “*imminent announcement*” on targeted support and simplified advice. Rath also suggests in the speech that the Mortgage Charter (designed for a period of sharply rising interest rates) could be retired.

[Speech](#)

- 6.2 FCA Handbook - New, improved website to be launched - 26 June 2025** - The FCA has updated its webpage on its Handbook of rules and guidance to note that it is launching a new and improved Handbook website. The website will have all the features users are familiar with but will be easier to navigate; users will be able to compare different versions of Handbook text to

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see what has been added or removed over time. The FCA plans to launch a beta version of the website soon and expects to roll out the new website fully later in 2025.

[Updated webpage](#)

BANKING AND FINANCE //

7 COUNCIL OF THE EUROPEAN UNION AND EUROPEAN PARLIAMENT

- 7.1 CMDI framework reform - Political agreement reached - 26 June 2025** - The Council of the EU and the European Parliament have announced that they have reached a provisional agreement on the proposal for amending the EU bank crisis management and deposit insurance (CMDI) framework. The CMDI review amends the Bank Recovery and Resolution Directive (2014/59/EU), the Single Resolution Mechanism Regulation (806/2014) and the Deposit Guarantee Schemes Directive (2014/49/EU). It seeks to improve the resolution process for small and medium-sized banks by giving them access to industry-funded safety nets as an additional resolution-financing tool. The Council and the Parliament have agreed that access to these industry-funded safety nets will be subject to strict safeguards.

The provisional political agreement requires approval by the Council and the Parliament before it can come into force.

[Council of the EU press release](#)[European Parliament press release](#)

8 EUROPEAN BANKING AUTHORITY

- 8.1 Payment Accounts Directive - EBA publishes report on standardised terminology - 20 June 2025** - The European Banking Authority (EBA) has published a report on its review of standard terms for the most common services related to payment accounts under the Payment Accounts Directive (2014/92/EU) (PAD).

In short, the report finds that the standard terms remain fit for purpose across the EU. While it may be beneficial to amend the terms to include instant credit transfers, any benefit would be outweighed by the costs involved, according to the EBA. The EBA has therefore decided not to amend the terms and will revisit its findings in four years' time (or when significant market or legislative developments occur).

[EBA: Report on the standardised terminology for services related to payment accounts under PAD \(EBA/REP/2025/18\)](#)

[Press release](#)

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9 BANK OF ENGLAND, FINANCIAL CONDUCT AUTHORITY, PRUDENTIAL REGULATION AUTHORITY AND PAYMENT SYSTEMS REGULATOR

- 9.1 Regulation of UK payments systems - Bank of England, FCA, PRA and PSR update MoU - 24 June 2025** - The Bank of England, the FCA, the Payment Systems Regulator (PSR) and the PRA (together, the authorities) have reviewed and updated a memorandum of understanding (MoU) on their roles in the regulation of UK payment systems. The MoU is now structured around five principles for regulatory cooperation, explained further in the MoU. The FCA has published a webpage on how the regulatory remits of the authorities fit together in the regulation of payments as well as a diagram illustrating the authorities' various workstreams and the extent to which they overlap in this context.

The MoU will be further revised once the PSR is consolidated into the FCA.

[Revised MoU between the Bank, FCA, PSR and PRA \(June 2025\)](#)

[Bank of England statement](#)

[FCA statement](#)

[PSR statement](#)

[FCA information sheet: How some of the Authorities' payments work fits together](#)

10 PRUDENTIAL REGULATION AUTHORITY

- 10.1 Credit Union Service Organisations - PRA consults - 24 June 2025** - The PRA has published a consultation paper (CP13/25) on proposed reforms to its rules for credit unions that invest in credit union service organisations (CUSOs) (entities that are typically established and owned by credit unions and provide services exclusively to credit unions and their members).

The PRA is proposing to specify in Chapter 6 of the Credit Unions Part of the PRA Rulebook that a credit union may invest in a CUSO and to add a new chapter to its supervisory statement on supervising credit unions (SS2/23), setting out its expectations for the management of associated prudential risks. The deadline for comments is 24 October 2025.

The PRA offered a modification by consent in April 2024 for credit unions that invest surplus funds in CUSOs that applies in the period before the rule changes to the Credit Unions Part come into force, as previously reported in this Bulletin.

[PRA consultation paper: Credit Union Service Organisations \(CP13/25\)](#)

11 FINANCIAL CONDUCT AUTHORITY

- 11.1 Future of the mortgage market - FCA publishes discussion paper - 25 June 2025** - The FCA has published a discussion paper (DP25/2) on the future of the mortgage market. This follows the FCA's March 2025 call for evidence on the impact of its interest rate stress test rule (MCOB 11.6.18R) and May 2025 consultation (CP25/11) on proposals to simplify responsible lending and advice rules for mortgages, which closed on 4 June 2025. The FCA intends to publish a policy

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statement to CP25/11 in Q3 2025 and will consider relevant responses alongside responses to DP25/2.

DP25/2 considers areas where changes may be desirable to support sustainable home ownership and economic growth, as well as where introducing more flexibility could allow firms to tailor their product offerings to consumers' evolving needs. Possible measures include updating responsible lending rules to support wider access to sustainable home ownership; ensuring the regulatory framework and the market are prepared for anticipated increases in demand for later life lending; introducing more flexibility to promote consumer understanding, information needs and innovation; and rebalancing the collective risk appetite in mortgage lending.

Comments on the paper are welcomed by 19 September 2025. Alongside DP25/2, the FCA will continue to engage with key stakeholders through forums, roundtables and individual meetings.

[FCA discussion paper: Mortgage rule review: the future of the mortgage market \(DP25/2\)](#)

[Webpage](#)

[Press release](#)

- 11.2 Risk management and wind-down planning at e-money and payment firms - FCA publishes findings of multi-firm review - 26 June 2025** - The FCA has published the findings of its multi-firm review of risk management and wind-down planning at a sample of 14 e-money and payments firms.

In short, the FCA found that none of the firms it reviewed met its expectations fully. In particular, they were not following the guidance in FG20/1 on assessing adequate financial resources. The findings identify main areas for improvement in relation to firms' risk management frameworks and notes that almost all the wind-down plans it reviewed needed to be more credible. The FCA will continue to engage with the sector to ensure it has effective risk management and wind-down plans in place.

[FCA multi-firm review: Risk management and wind-down planning at e-money and payments firms](#)

12 PAYMENT SYSTEMS REGULATOR

- 12.1 Competitive procurement for running LINK infrastructure - PSR consults on revocation of Specific Direction 4 - 26 June 2025** - The Payment Systems Regulator (PSR) has published a consultation paper (CP25/2) on its proposal to revoke Specific Direction 4 (SD4) and SD4a (which amended SD4). SD4 requires the operator of the LINK payment system to undertake a competitive procurement for the infrastructure needed to run LINK every 10 years. The PSR suggests that the competitive tender required by SD4 may not now be an effective way of reducing the risks associated with the lack of effective competition for the supply of LINK's central infrastructure.

Comments on the proposal are welcomed by 17 July 2025.

[PSR consultation paper: Revocation of Specific Direction 4 \(and SD4a\) \(CP25/2\)](#)

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13 LENDING STANDARDS BOARD

- 13.1 LSB to close by October 2025 - 26 June 2025** - The Lending Standards Board (LSB) has announced that it will begin an orderly and solvent wind-down of its operations this summer, with closure planned for the end of October 2025. In its announcement, the LSB refers to its decision to retire (on 31 March 2025) its Standards of Lending for personal customers, having found that there was considerable overlap between the standards and the FCA's consumer duty. Moreover, many firms have also extended the consumer duty principles to their SME customers.

[Press release](#)

14 RECENT CASES

- 14.1 *MeSoFa Vermögensverwaltungs AG v Single Resolution Board* (Case T 450/22), 20 June 2025**

Single Resolution Board - Single Resolution Mechanism Regulation - resolution scheme

The European General Court has dismissed an action brought by MeSoFa Vermögensverwaltungs AG (formerly Sberbank Europe AG) against the Single Resolution Board (SRB) that sought annulment of the SRB's decision not to adopt a resolution scheme for the bank.

The case concerned the SRB's decision of 1 March 2022 not to place the bank under resolution following its assessment that resolution action was not necessary in the public interest. This decision was made after the European Central Bank determined that the bank was failing or likely to fail due to a deteriorating liquidity situation. In its judgment, the court considered arguments made by the applicant based on its interpretation of the Single Resolution Mechanism Regulation (806/2014) and the Bank Recovery and Resolution Directive (2014/59/EU).

[MeSoFa Vermögensverwaltungs AG v Single Resolution Board \(Case T 450/22\)](#)

- 14.2 *R (Chapman) v FOS* - Case tracker updated to show permission to appeal application in judicial review of FOS decision - 23 June 2025** - The Court of Appeal has updated its case tracker for civil appeals to note that an application for permission to appeal the High Court decision in *R (Chapman) and another v Financial Ombudsman Service Ltd* [2025] EWHC 905 (Admin) has been made. In April 2025, the High Court dismissed a claim for judicial review of a February 2024 decision made by the Financial Ombudsman Service (FOS) in response to a complaint made about a bank by customers who claimed to have been mortgage prisoners.

[Updated webpage](#)

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SECURITIES AND MARKETS //

15 EUROPEAN SECURITIES AND MARKETS AUTHORITY

- 15.1 Strengthening EU clearing and cooperation - ESMA publishes speech - 20 June 2025** - The European Securities and Markets Authority (ESMA) has published a speech delivered by Klaus Löber, chair of the ESMA CPP supervisory committee, on strengthening EU clearing and cooperation in a changing landscape and referring to the entry into force of EMIR 3 ((EU) 2024/2987).

Löber notes that ESMA is currently considering feedback to its February 2025 consultation on the conditions and documentation for authorisation extensions and model change validations (closed in April 2025). Work is also underway to strengthen the resilience of financial market infrastructures to cyber threats and third-party risks. Löber comments that the CMPI-IOSCO Operational Resilience Group (ORG) has been developing practical tools to support the implementation of cyber guidance issued by the Committee on Payments and Market Infrastructures (CPMI) and the International Organization of Securities Commissions (CPMI-IOSCO), which was published in 2016. CMPI-IOSCO is also progressing work on other aspects of CCP risk management, including a renewed focus on general business risk and non-default losses. A consultation paper is expected in H2 2025.

[Speech](#)

- 15.2 Consolidated tape provider for shares and ETFs - ESMA launches selection procedure - 20 June 2025** - The European Securities and Markets Authority (ESMA) has launched the selection procedure for the consolidated tape provider (CTP) for shares and exchange-traded funds (ETFs). Applicants are encouraged to register and submit their requests to participate in the selection procedure by 25 July 2025. ESMA will assess applications against the criteria (further specified in the regulatory technical standards the European Commission adopted on 12 June 2025) and invite successful candidates to submit their applications.

ESMA intends to select the applicant by the end of 2025. The applicant will operate the CTP for five years and be invited to apply for authorisation with ESMA.

[Press release](#)

- 15.3 Streamlining transaction reporting - ESMA launches call for evidence and puts RTS changes on hold - 23 June 2025** - The European Securities and Markets Authority (ESMA) has launched a call for evidence on the simplification of financial transaction reporting under the Markets in Financial Instruments Regulation (600/2014/EU) (MiFIR), the European Market Infrastructure Regulation (648/2012/EU), the Securities Financing Transactions Regulation ((EU) 2015/2365) and sectoral regulation. It forms part of the European Commission's and ESMA's work aimed at burden reduction and simplification.

Section 4 of the call for evidence sets out ESMA's proposals for the simplification of regulatory reporting. These involve removing duplications in current frameworks or creating a unified

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reporting template based on a 'report once' principle. The call for evidence closes to comments on 19 September 2025. ESMA intends to publish a final report in early 2026 on the preferred simplification option. ESMA does not intend make changes to the existing reporting frameworks that it consulted on in 2024 as part of its work connected to MiFIR II ((EU) 2024/791) for the time being. It has instead published two final reports summarising feedback to its consultations. Pausing these RTS changes will allow market participants to freeze their implementation efforts. The rest of the MiFIR review will proceed as planned.

ESMA: Call for evidence on a comprehensive approach for the simplification of financial transaction reporting (ESMA12-437499640-3021)

ESMA: Final report on transaction data reporting (RTS 22) and order book data (RTS 24) under MiFIR (ESMA12-2121844265-4779)

ESMA: Final report on supply of reference data (RTS 23) under MiFIR (ESMA12-2121844265-384)

Press release

- 15.4 EMIR 3 - ESMA consults on margin transparency and cost of clearing - 24 June 2025** - The European Securities and Markets Authority (ESMA) has published two consultation papers on draft regulatory technical standards (RTS) on margin transparency requirements (ESMA91-1505572268-4004) and information on clearing fees and associated costs (ESMA91-1505572268-4204) under the Regulation amending EMIR ((EU) 2024/2987) (EMIR 3). The draft RTS deal with (i) requirements on the margin model and the simulation tool to be provided by central counterparties (CCPs) to their clearing members and by clearing service providers (CSPs) to their clients; and (ii) the type of information to be disclosed by CSPs relating to costs and fees for the provision of clearing services.

Feedback on both sets of draft RTS is welcomed by 8 September 2025. ESMA is required to submit the final draft RTS to the European Commission by 25 December 2025.

ESMA: Consultation paper on draft RTS on margin transparency requirements (ESMA91-1505572268-4004)

ESMA: Consultation paper on the draft RTS on information on clearing fees and associated costs (ESMA91-1505572268-4204)

Press release

- 15.5 CCP Recovery and Resolution Regulation - ESMA publishes briefing on use of cash calls - 25 June 2025** - The European Securities and Markets Authority (ESMA) has published a briefing on the operationalisation of resolution cash calls (used by CCPs to request additional funds from their clearing members during times of financial distress) under the Regulation on the recovery and resolution of central counterparties (CCPs) ((EU) 2021/23) (CCP Recovery and Resolution Regulation or CCPRRR). The CCPRRR allows national resolution authorities (NRAs) to use a resolution cash call to manage losses and maintain liquidity during a resolution event as well as to recapitalise a CCP with the aim of ensuring its stability and continuity.

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The briefing aims to set out an approach for including a resolution cash call in the toolkit of the resolution tools in a resolution plan for an individual CCP. It covers the approach that NRAs should take to, among others, gaining access to the relevant data from a CCP and calibrating the available amount of resources available through a cash call.

[ESMA: CCP resolution briefing on the operationalisation of resolution cash calls \(ESMA91-1525761655-4698\)](#)

[Webpage](#)

[Press release](#)

- 15.6 DLT Pilot Regime - ESMA publishes report on implementation - 25 June 2025** - The European Securities and Markets Authority (ESMA) has published a report on the Regulation of a pilot regime for market infrastructures based on distributed ledger technology ((EU) 2022/858) (referred to as the DLT Pilot Regime). The report comes at an inflection point for the regime, which, despite an initially limited uptake, is now seeing growing interest from potential applicants.

The report presents recommendations to the European Commission about how to make the regime more attractive to the market, including suggested amendments to make it permanent and more flexible. These recommendations are intended to complement the Commission's public consultation on the regime, which is part of the wider consultation on the savings and investments union.

[ESMA: Report on the functioning and review of the DLT Pilot Regime \(ESMA75-117376770-460\)](#)

[Webpage](#)

[Press release](#)

- 15.7 Scope of settlement discipline under CSDR - ESMA publishes final report - 26 June 2025** - The European Securities and Markets Authority (ESMA) has published a final report containing technical advice on the scope of settlement discipline under the Central Securities Depositories Regulation (909/2014) (CSDR), which specifies that the settlement penalty mechanism does not apply where the underlying cause of a settlement failure is not attributable to the participants in the transactions or to operations that are not considered as trading.

The report considers the circumstances in which underlying causes of settlement failures are not considered to be attributable to the participants, which would include technical failures at the level of a central securities depository such as system outages, cyberattacks or network disruptions. The types of operations that should not be considered as trading for these purposes include market claims and corporate actions on stock, share registration and the redemption of fund units or shares on the primary market. The report additionally sets out ESMA's thinking on the timing for the implementation of these exemptions.

[ESMA final report: Technical advice on the scope of CSDR settlement discipline \(ESMA74-2119945925-2208\)](#)

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16 BANK OF ENGLAND

- 16.1 FX Global Code - Bank of England renews statement of commitment - 23 June 2025** - The Bank of England (the Bank) has published a renewed statement of commitment to the FX Global Code (the Code), which sets out global principles of good practice in international foreign exchange (FX) markets. By signing the statement, the Bank attests that its internal processes are consistent with the principles of the Code.

In a related press release, the Bank strongly encourages all FX market participants, including its counterparties, to adhere and commit to the updated Code.

[Bank of England: Statement of commitment to the updated FX Global Code](#)

[Press release](#)

ASSET MANAGEMENT //

17 EUROPEAN SECURITIES AND MARKETS AUTHORITY

- 17.1 Integrated collection of fund data - ESMA publishes discussion paper - 23 June 2025** - The European Securities and Markets Authority (ESMA) has published a discussion paper (ESMA12-2121844265-4904) on the integrated collection of funds' data, which has been released because of changes made by the Directive amending the Alternative Investment Fund Managers Directive (2011/61/EU) (AIFMD) and the UCITS Directive (2009/65/EC) ((EU) 2024/927) (AIFMD II), and ESMA's simplification and burden reduction initiative. ESMA is required to report to the European Commission by April 2026 on the development of an integrated reporting system for supervisory data, to address areas of duplication and inconsistency between reporting frameworks in the asset management sector and the broader financial sector.

The paper presents several options for improving different aspects of reporting, including proposals to integrate multiple reporting templates and to centralise reporting processes and infrastructures. Responses are welcomed by 21 September 2025. ESMA intends to consider the feedback in Q4 2025 and expects to publish its final report in April 2026.

A call for evidence on simplifying transaction reporting has been published separately (see further the Securities and Markets section of this Bulletin).

[ESMA: Discussion paper on the integrated collection of funds' data \(ESMA12-2121844265-4904\)](#)

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- 17.2 Review of the UCITS Eligible Assets Directive - ESMA publishes advice to the European Commission - 26 June 2025** - The European Securities and Markets Authority (ESMA) has published its technical advice (ESMA34-2087785638-1548) to the European Commission on the review of the UCITS Eligible Assets Directive (2007/16/EC) (EAD). A central element of the advice is the application of a look-through approach as a fundamental criterion for determining the eligibility of asset classes for at least 90% of the UCITS portfolio. The advice proposes to permit indirect exposures to alternative assets up to 10% (subject to regulatory safeguards, for example, on liquidity and valuation), with a view to improving risk diversification and generating returns from uncorrelated asset classes.

[ESMA: Final report on the technical advice to the European Commission on the review of the UCITS Eligible Assets Directive \(ESMA34-2087785638-1548\)](#)

[Press release](#)

INSURANCE //

18 INTERNATIONAL ASSOCIATION OF INSURANCE SUPERVISORS

- 18.1 Moving to a risk-based solvency regime - IAIS publishes guidance - 20 June 2025** - The International Association of Insurance Supervisors (IAIS) has published guidance on the transition to a risk-based solvency (RBS) regime. The paper provides guidance on key considerations in the design and implementation of an RBS regime as well as a case studies of RBS implementation in various jurisdictions.

The IAIS hosted a public webinar to present the guidance and answer questions on 26 June 2025.

[IAIS: Guidance on transitioning to an RBS regime](#)

[Press release](#)

FINANCIAL CRIME //

19 FINANCIAL ACTION TASK FORCE

- 19.1 Financial inclusion and AML and CTF measures - FATF updates guidance - 24 June 2025** - The Financial Action Task Force (FATF) has published updated guidance on financial inclusion and anti-money laundering (AML) and counter terrorist financing (CTF) measures. The updated guidance aims to provide support in the design of AML and CTF measures that foster financial inclusion without compromising measures to combat crime and safeguarding financial integrity.

[FATF updated guidance: Financial inclusion and AML and CTF measures \(June 2025\)](#)

[Webpage](#)

- 19.2 Implementation of FATF Standards on Virtual Assets and Virtual Asset Service Providers - report published - 25 June 2025** - The Financial Action Task Force (FATF) has published a

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targeted update on the implementation of its standards on cryptoassets (also referred to as virtual assets in the update) and virtual asset service providers (VASPs). It sets out the findings from the FATF's assessment of jurisdictions' compliance with recommendation 15 on new technologies (R.15), as well as recommendation 16 on payment transparency (R.16) (known as the 'travel rule') and the related interpretative notes. Overall, jurisdictions continue to face challenges in assessing risks associated with cryptoassets and VASPs, and implementing appropriate mitigating measures. The update sets out key areas for improvement and recommendations for both public and private sectors to better address these issues.

[FATF: Targeted update on implementation of the FATF Standards on Virtual Assets and Virtual Assets Service Providers](#)

[Webpage](#)

ENFORCEMENT //

20 FINANCIAL CONDUCT AUTHORITY

20.1 Insider dealing and money laundering - FCA secures convictions - 20 June 2025 - The FCA has announced that it has secured convictions against two individuals for insider dealing and money laundering offences. One of the individuals worked as a research analyst at an asset management firm. They regularly obtained confidential, price-sensitive information for publicly traded companies as part of their role. Between 17 December 2019 and 25 March 2021, they conspired with another person to use that confidential information to deal in the shares of companies ahead of market announcements. In addition, the individuals received dirty cash derived from the proceeds of crime. The source of the cash was unrelated to the insider dealing with which they were charged.

The individuals will be sentenced on 4 July 2025. The FCA will also apply for confiscation orders to recover the proceeds of crime.

[Press release](#)

20.2 Whistleblowing disclosures - FCA publishes statistics for 2024/25 - 24 June 2025 - The FCA has published its annual report on whistleblowing disclosures for the period from 1 April 2024 to 31 March 2025 under the Prescribed Persons Regulations 2017 (SI 2017/507). The report comments that the number of whistleblowing reports continues to rise. It also refers to recent discussions on offering incentives to whistleblowers. It recognises the benefits a range of informants can provide in prosecuting criminal offences and will continue to engage with other agencies on how this type of intelligence may benefit it in the future.

[FCA: Prescribed Persons Annual Report 2024/25](#)

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21 RECENT CASES

21.1 *Staley v FCA* [2025] UKUT 00203 (TCC), 26 June 2025

FCA - Decision Notice - ban from holding senior management roles in financial services

The Upper Tribunal (Tax and Chancery Chamber) has published its decision in *Staley v Financial Conduct Authority* [2025] UKUT 00203 (TCC), upholding the FCA's May 2023 decision to ban Jes Staley, former Barclays Bank plc CEO, from holding senior management roles in the financial services industry. In a separate press release responding to the decision, the FCA reaffirmed its commitment to hold those in senior roles to the high standards required of them.

[Staley v FCA \[2025\] UKUT 00203 \(TCC\) \(26 June 2025\)](#)

[Webpage](#)

[FCA press release](#)

21.2 *FCA v Markou* - Supreme Court refuses application to appeal - 24 June 2025 - The Supreme Court has updated its webpage on *Financial Conduct Authority v Markou* (case reference UKSC/2025/0035) to note that it has refused an application for permission to appeal against the decision of the Court of Appeal in *Markou v Financial Conduct Authority* [2024] EWCA Civ 1575.

The Court of Appeal handed down its judgment in December 2024 in an appeal brought by the FCA against the April 2023 decision of the Upper Tribunal (Tax and Chancery Chamber) in *Markou v FCA* [2023] UKUT 101 (TCC), in which the Tribunal asked the FCA to reconsider its decision to ban an individual from financial services and directed that a fine should not be imposed. The Court of Appeal found that the FCA's decision to ban the individual was the correct one. However, it considered that the level of the fine should be adjusted to reflect the fact that not all allegations made were proved. It remitted the matter to the FCA with a direction to impose a lesser fine.

[Updated webpage](#)

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This Bulletin is prepared by the Financial Regulation Group of Slaughter and May in London. The Group comprises a team of lawyers with expertise and experience across all sectors in which financial institutions operate.

We advise on regulatory issues affecting firms across the financial services sector, including banks, investment firms, insurers and reinsurers, brokers, asset managers and funds, non-bank lenders, payment service providers, e-money issuers, exchanges and clearing systems. We also advise non-regulated businesses involved in financial regulatory matters. In addition, our leading financial regulatory investigations practice is regularly instructed by financial institutions requiring specialist knowledge of financial services regulation together with experience in high profile and complex investigations and contentious regulatory matters.

Most of the projects that we advise on have an extensive international or cross-border element. We work in seamless integrated teams with leading independent law firms which offer many of the most highly regarded financial institutions lawyers in Europe, the US and Asia, as well as strong and constructive relationships with local regulators.

Our Financial Regulation Group also produces occasional briefing papers and other client publications. The five most recent issues of this Bulletin and our most recent briefing papers and client publications appear on the Slaughter and May website [here](#).

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