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CENTRE for **REGULATORY STRATEGY EMEA** 

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#### **Highlights**

With the expiry of the UK CCPs equivalence decision fast approaching, industry welcomed confirmation by Vice-President Dombrovskis that the European Commission intends to extend this beyond 30<sup>th</sup> March 2020, "to prepare for any eventuality".

Ahead of an expected increase in scrutiny by the FCA of firms' Libor transition progress, the FCA has set out its core conduct expectations for firms. Its guidance highlights that firms are expected to: a) put in place robust governance arrangements for managing LIBOR transition risks, b) amend contracts, where possible, for LIBOR-linked products that mature beyond the end-2021 in negotiation with firms' customers, c) avoid offering LIBOR-linked products in new contracts that mature after end-2021 and d) treat customers fairly/ communicate with them in a way that is clear, fair and not misleading.

In the general insurance sector, the PRA has issued a Dear CEO letter outlining its current priority areas. Priorities include firms' reserve adequacy and associated reserving governance and controls; emerging risk trends and experience in firms' exposure management practices; the extent to which firms are demonstrating discipline in underwriting strategies, remediation activity and controls; and ensuring firms are developing and maintaining a culture where staff are encouraged to speak up and raise concerns.

In the EU, ESMA Chair, Steven Maijoor confirmed in a recent speech that ESMA has proposed a "staggered" timeline to the upcoming review of MiFID II in the light of the impacts of Brexit. A report on the cost of market data and the establishment of a consolidated tape (CT) for equity instruments will be submitted to the European Commission next month. ESMA has also started working on a reports assessing the MiFID II transparency regime, and the quoting behaviour of Systematic Internalisers (SIs) in non-equity instruments. It intends to consult on these reports at the beginning of 2020 and submit the reports to the Commission in July 2020. Maijoor also highlighted his personal view that ESMA should consider whether disclosures to non-retail clients need reviewing whilst also asserting that

an assessment of the full impact of the research unbundling requirements is premature.

Finally, the EBA published its roadmap for CRD 5/CRR2/BBRD level 2 mandates. The EBA announced that the delivery of almost all mandates with a deadline between 6 and 9 months from the legislative package's entry into force (i.e. those with a deadline either at the end of 2019, or by the end of Q1 2020) will be delayed by 3-9 months. There will also be some limited delays of mandates due to be delivered 1 year or more after entry into force in the areas of large exposures, IRRBB and MREL/bail-in execution.

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### **Glossary**

AFMs = Authorised Fund Managers

AI = Artificial Intelligence

AIFMD = Alternative Investment Fund Managers Directive

AMF = Autorité des Marchés Financiers

AML = Anti-Money Laundering

APA = Approved Publication Arrangement

AUM = Assets under management

BCBS = Basel Committee on Banking Supervision

BEAR = Banking Executive Accountability Regime

BIS = Bank for International Settlements

BMR = Benchmarks Regulation

BRRD = Bank Recovery and Resolution Directive

BTS = Binding Technical Standard

BoE = Bank of England

CBI = Central Bank of Ireland

CCP = Central Counterparty

CP= Consultation Paper

CTF = Counter Terrorist Financing

CISO = Chief Information Security Officer

CMA = Competition and Markets Authority

CMU = Capital Markets Union

CNMV = Comisión Nacional del Mercado de Valores

CQS = Credit Quality Step

CRD = Capital Requirements Directive

CRR = Capital Requirements Regulation

CROE = Cyber Resilience Oversight Expectations

CSSF = Commission de Surveillance du Secteur Financier

CTP = Consolidated Tape Provider

DB = Defined Benefit

DC = Defined Contribution

DP = Discussion Paper

DPA = Data Protection Agency

DRR = Digital Regulatory Reporting

EBA = European Banking Authority

ECB = European Central Bank

ECOFIN = Economic and Financial Affairs Council

EIOPA = European Insurance & Occupational Pensions Authority

 ${\sf EMEA} = {\sf Europe}, \, {\sf Middle} \, \, {\sf East} \, \, {\sf and} \, \, {\sf Africa}$ 

EMIR = European Market Infrastructure Regulation

EONIA = Euro Over Night Index Average

ESAs = European Supervisory Authorities

ESG: Environmental, Social, and Governance

ESMA = European Securities & Markets Authority

ESRB = European Systemic Risk Board

ESTER = Euro Short-Term Rate

EU = European Union

Euribor = Euro Interbank Offered Rate

FAMR = Financial Advice Market Review

FCA = Financial Conduct Authority

FinPro = Financial Protection

FGCA = Financial Guidance and Claims Act 2018

FMIs = Financial Market Infrastructures

FOS = Financial Ombudsman Service

FPC = Financial Policy Committee

FRTB = Fundamental Review of the Trading Book

FS = Financial Services

FSA = Financial Services Authority

FSB = Financial Stability Board

GBP = British pound sterling

GDP = Gross Domestic Product

GDPR = General Data Protection Regulation

GSIBs = Global Systemically Important Banks

HMT = Her Majesty's Treasury

IAIS = International Association of Insurance Supervisors

IASB = International Accounting Standards Board

IBOR = Interbank Offered Rate

ICAAP = Internal Capital Adequacy Assessment Process

ICO = Information Commissioners Office

ICS = Insurance Capital Standard

IDD = Insurance Distribution Directive

IFRS = International Financial Reporting Standards

ILAAP = Internal Liquidity Adequacy Assessment Process

IM = Initial Margin

IOSCO = International Organization of Securities Commissions

IPU = Intermediate Parent Undertaking

IRB = Internal Ratings Based

IRRBB = Interest Rate Risk in the Banking Book

ISAs = Individual Savings Accounts

IT = Information Technology

JST = Joint Supervisory Teams

KID = Key Information Document

LEI = Legal Entity Identifier

LIBOR = London Interbank Offered Rate

LTV = Loan to Value

M&A = Mergers and Acquisitions

MI = Management Information

MiFID = Markets in Financial Instruments Directive

MiFIR = Markets in Financial Instruments Regulation

MLD = Money Laundering Directive

MoU = Memorandum of Understanding

MREL = Minimum requirement for own funds and eligible liabilities

MTF = Multilateral Trading Facility

NCA = National Competent Authority

NED = Non-Executive Director

NGFS = Network for Greening the Financial System

NPLs = Non-performing Loans

NSFR = Net Stable Funding Ratio

OCIR - Operational Continuity in Resolution

ORSA = Own Risk and Solvency Assessment

OTF = Organised Trading Facility

OTC = Over the counter

PPI = Payment Protection Insurance

PRA = Prudential Regulation Authority

PRIF = Prudential Regime for Investment Firms

PRIIPs = Packaged Retail Investment and Insurance Products

PS = Policy Statement

PSD2 = Revised (second) Payment Services Directive

RDR = Retail Distribution Review

RFRs = Risk-Free Rates

RRM = Risk Reduction Measures

RTGS = Real Time Gross Settlement

RTS = Regulatory Technical Standard

RW = Risk Weight

SA = Standardised Approach

SFTR = Securities Financing Transactions Regulation

SI = Systematic Internaliser

SIPPs = Self Invested Personal Pensions

SM&CR = Senior Managers and Certification Regime

SONIA = Sterling Overnight Index Average

SRB = Single Resolution Board

SRF = Single Resolution Fund

SREP = Supervisory Review and Evaluation Process

SS = Supervisory Statement

SSM = Single Supervisory Mechanism

TCA = Total Capital Adequacy

TCFD = Task Force on Climate-related Financial Disclosures

TIBER = Threat Intelligence-based Ethical Red Teaming

TLAC = Total Loss-Absorbing Capital

TMTP = Transitional Measure on Technical Provisions

TPP = Third-Party Providers

TPR = Temporary Permissions Regime

TRIM = Targeted Review of Internal Models

TRR = Temporary Recognition Regime

UCITS = Undertakings for Collective Investments in Transferable Securities

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