

CLIFFORD CHANCE



Funds and Investment Management News

February 2025

Welcome to Clifford Chance's Funds and Investment Management News. This monthly update covers legal and regulatory developments from around the world in the funds and investment management sector, as well as our briefings and details of our conferences events and [Insights for Asset Managers webinar series](#).

If you would like to know more about a particular development, please get in touch with your usual Clifford Chance contact or any of our team listed at the end of this newsletter.

Further details and related resources, including [previous editions of this newsletter](#) and our [ESG newsletter](#), can be found on the [Clifford Chance Financial Markets Toolkit](#) and [Clifford Chance Funds and Investment Management page](#).

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International

FSB launches thematic peer review on its global regulatory framework for cryptoasset activities

The Financial Stability Board (FSB) [initiated](#) a peer review to assess the implementation of its global regulatory framework for cryptoasset activities. This framework includes recommendations for regulating, supervising, and overseeing cryptoasset markets and global stablecoin arrangements. The review aims to evaluate the progress of FSB member and select non-member jurisdictions and gather lessons learned. The FSB is seeking stakeholder feedback on:

- The impact of regulatory frameworks on business decisions of cryptoasset issuers and service providers.
- Challenges faced by market participants in meeting regulatory requirements.
- Differences in financial stability vulnerabilities of cryptoasset activities across jurisdictions.
- Market practices or trends that may threaten financial stability.

Feedback is due by 28 March 2025.

FSB publishes work programme for 2025

The Financial Stability Board (FSB) released its [2025 work programme](#), focussing on challenges like digitalisation, climate change and macroeconomic shifts. Key priorities include enhancing financial stability, improving non-bank financial intermediation resilience and addressing climate-related financial risks. The FSB plans to publish its annual report on global financial stability before the G20 Leaders' Summit in November 2025.

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United States of America

Trump halts enforcement of the Foreign Corrupt Practices Act ("FCPA")

On February 10, President Trump signed an [executive order](#) to amend the enforcement guidelines of the Foreign Corrupt Practices Act of 1977 ("FCPA"), with the stated aim of enhancing American competitiveness and economic strength. This order requires the Attorney General to pause existing FCPA actions while developing new enforcement guidance to ostensibly create a level playing field for U.S. businesses abroad. Past and current FCPA actions will undergo review, while future investigations will depend on the new guidelines and require the Attorney General's approval. The Trump administration has redefined the focus of FCPA enforcement, concentrating on foreign bribery cases linked to cartels and transnational criminal organizations and streamlined the procedures for handling such cases. The executive order underscores the administration's commitment to a deregulatory agenda for American companies in the global marketplace by addressing perceived overenforcement of the FCPA.

SEC Halts Implementation of Reg SHO for One Year

The SEC announced a [temporary stay](#) of enforcing compliance with Rule 13f-2 of the Exchange Act and reporting on Form SHO, extending the deadline for initial Form SHO filings by institutional investment managers to February 17, 2026, for the January 2026 reporting period. This new rule mandates increased short-selling disclosures, which were originally set to start in January 2025. Eligible institutional investment managers will need to report monthly on the short selling of specific equity securities using the SEC's EDGAR system. Reg SHO will require institutional investment managers to report short-sale information to the SEC, including month-end short positions and net daily short sale activity. The SEC intends to publish aggregate short positions and daily activity information for each equity security one month after the end of each calendar month. The temporary stay provides managers additional time to make necessary technical adjustments to follow the standards released in December 2024, ensuring that the data is accurate and market-informative. Acting Chairman Uyeda highlighted the stay's role in facilitating compliance without affecting vigilance against illegal activities like manipulative, naked short selling.

Trump Signs Executive Order "Strengthening American Leadership in Digital Financial Technology"

Signed on January 23, the order signals a [shift in US government policy](#) towards the digital asset industry and seeks to promote United States' leadership in digital assets, aiming to make the country the "world capital" of cryptocurrency. The order establishes a working group, currently chaired by venture capitalist David Sacks, to review current regulations and tasks it with proposing a federal regulatory framework governing the issuance and operation of digital assets, including stablecoins, in the United States with deadlines for initial reviews over the coming months. Separately, the order prohibits the establishment, issuance and use of Central Bank Digital Currencies ("CBDCs"), citing risks to financial stability, individual privacy and national sovereignty

Europe

European Union

EU Commission publishes 2025 work programme

The EU Commission's [2025 work programme](#) outlines key strategies, action plans and legislative initiatives for the year. Highlights include the first Omnibus package on sustainability, the second Omnibus package on investment simplification and an AI Continent Action Plan, all set for Q1 2025. The programme also features a review of the Securitisation Framework and a Quantum Strategy for the EU in Q2 2025 and a Digital Networks Act in Q4 2025.

Savings and Investments Union: EU Commission launches call for evidence

The EU Commission launched a [call for evidence](#) to gather input on its approach to the Savings and Investments Union (SIU), which aims to increase returns on savings for EU citizens and provide financing opportunities for businesses. Building on the Capital Markets Union and Banking Union, the SIU focuses on integrating financial markets and enhancing competitiveness. Responses are due by 3 March 2025 and the feedback will inform the Commission's strategy, expected in Q1 2025.

ESMA, ECB and EU Commission launch new governance structure for T+1 settlement cycle transition

The European Securities and Markets Authority (ESMA), the European Central Bank (ECB) and the EU Commission [introduced](#) a new governance structure to facilitate the transition to the T+1 settlement cycle in the EU. This includes an industry committee, technical workstreams and a coordination committee to address technological, legal and regulatory adaptations. The first coordination committee meeting is set for 6 February 2025, with the EU Commission considering legislative changes for a shorter settlement cycle.

EU Commission proposes transition to T+1 settlement by 11 October 2027

The EU Commission proposed a [regulation](#) to amend the Central Securities Depositories Regulation (CSDR), shortening the settlement period for EU securities transactions from two days (T+2) to one day (T+1) by 11 October 2027. This transition period allows market participants to prepare for the change. The proposal will be reviewed by the European Parliament and the Council before it can be adopted and published in the EU Official Journal.

Platform on Sustainable Finance publishes report on simplifying EU taxonomy to foster sustainable finance

The Platform on Sustainable Finance released a [report](#) with recommendations to simplify and enhance taxonomy reporting. Building on previous reports, it proposes five main measures, including refining the 'do no significant harm' (DNSH) assessment, introducing a materiality principle and defining guidelines for estimates. The report aims to improve the effectiveness of taxonomy reporting and will be presented in a webinar on 14 February 2025.

Platform on Sustainable Finance publishes report on building trust in transition

The Platform on Sustainable Finance released a [report](#) on building trust in transition, offering an initial analysis to help financial market participants align their transition plans with the EU Commission's recommendations. The report highlights how integrating the EU Taxonomy and other sustainable finance tools can enhance these plans and improve access to transition finance. It was presented in a webinar on 27 January 2025.

Money market funds: ESRB assesses EU Commission's compliance with its recommendation on reforms

The European Systemic Risk Board (ESRB) published a [report](#) assessing the EU Commission's compliance with its 2021 recommendation on money market fund reforms. The report found the Commission materially non-compliant with three of the four recommendations, which were not implemented and inadequately justified. This assessment, based on actions up to the end of 2023, was approved for publication on 14 January 2025.

EBA and ESMA publish joint report on recent developments in cryptoassets

The European Banking Authority (EBA) and the European Securities and Markets Authority (ESMA) published a [joint report](#) on cryptoassets, focussing on decentralised finance (DeFi) and crypto lending, borrowing and staking. The report finds that DeFi remains niche, with significant risks of money laundering and terrorist financing. It also highlights specific risks like excessive leverage and information asymmetries in cryptoasset services.

EBA amends guidelines on ICT and security risk management measures in light of DORA application

The European Banking Authority (EBA) narrowed the scope of its ICT and security risk management [guidelines](#) due to the Digital Operational Resilience Act (DORA) taking effect on 17 January 2025. The amendments simplify the framework and clarify that the guidelines now only apply to entities covered by DORA, such as credit institutions and payment institutions, while PSD2 requirements continue to apply to other payment service providers not covered by DORA.

ESMA publishes 2026-2028 Programming Document

The European Securities and Markets Authority (ESMA) published its [2026-2028 Programming Document](#). This document includes ESMA's mission statement, a multi-annual work programme with key performance indicators and details on human and financial resources. It also outlines ESMA's annual work programme for 2026, strategic priorities, thematic drivers and information on the organisation and its peer review work programme.

ESMA publishes results of survey on legal entities identifiers

The European Securities and Markets Authority (ESMA) published the [results](#) of its October 2024 survey on legal entity identifiers. The survey revealed strong industry engagement, high costs for adapting reporting systems to additional identifiers and a strong preference for the Legal Entity Identifier (LEI) for reporting (86% of respondents). Pan-EU associations also suggested improving EUID automation and its interoperability with LEI to reduce burdens and avoid duplications.

MiFIR Review: ESMA reminds investment firms of new regime for reporting OTC transactions

The European Securities and Markets Authority (ESMA) [announced](#) that from 3 February 2025, the responsibility for reporting OTC transactions will shift from systematic internalisers (SIs) to designated

publishing entities (DPEs). This change aims to reduce the administrative burden on investment firms, as the mandatory SI regime will be discontinued from 1 February 2025. Additionally, the quarterly publication of SI data will cease immediately.

ESMA launches common supervisory action with NCAs on compliance and internal audit functions

The European Securities and Markets Authority (ESMA) **initiated** a common supervisory action (CSA) with national competent authorities (NCAs) to assess compliance and internal audit functions of UCITS management companies and alternative investment fund managers (AIFMs) across the EU. This CSA, running throughout 2025, aims to evaluate the effectiveness of these functions in ensuring internal control mechanisms are in place. ESMA plans to publish a final report with the results in 2026.

ESMA consults on amendments to settlement discipline

The European Securities and Markets Authority (ESMA) launched a **consultation** on settlement discipline to improve settlement efficiency. The proposals include reduced timeframes for allocations and confirmations, electronic machine-readable allocations and the implementation of hold and release and partial settlement by all central securities depositories. The consultation, considering the transition to T+1 in the EU, seeks stakeholder views on additional measures and is open for comments until 14 April 2025.

ESMA publishes statement and Q&A on non-MiCA compliant ARTs and EMTs

The European Securities and Markets Authority (ESMA) issued a **statement** and **Q&A** on services related to unauthorised asset-referenced tokens (ARTs) and electronic money tokens (EMTs) under the Markets in Cryptoassets Regulation (MiCA). It emphasises that ARTs and EMTs must be issued by authorised issuers and reminds cryptoasset service providers (CASPs) not to offer non-compliant ARTs and EMTs. CASPs are expected to help EU investors liquidate or convert their positions and comply with restrictions by the end of Q1 2025.

DORA: RTS on conduct of oversight activities published in Official Journal

Commission Delegated Regulation (EU) 2025/295, setting out regulatory technical standards (RTS) under the Digital Operational Resilience Act (DORA), was published in the Official Journal. The RTS detail the information required from critical ICT third-party service providers, including a template for subcontracting arrangements and standards for risk assessment by competent authorities. The Regulation will enter into force on 5 March 2025.

MiCA: RTS on complaints handling, continuity and regularity in cryptoasset services, cryptoasset white papers, supervisory colleges and cooperation published in Official Journal

The Official Journal **published** several Delegated Regulations setting out regulatory technical standards (RTS) under the Markets in Cryptoassets Regulation (MiCA). These include templates for cooperation arrangements, procedures for handling complaints, approval of cryptoasset white papers and conditions for supervisory colleges. The regulations will enter into force on 5 March 2025.

MiCA: EBA resubmits draft conflicts of interest RTS for issuers of ARTs

The European Banking Authority (EBA) published an **opinion** on the EU Commission's proposed amendments to the EBA's draft regulatory technical standards (RTS) on conflicts of interest for issuers

of asset-referenced tokens (ARTs) under MiCA. The EBA endorses the substantive amendments and has resubmitted the amended draft RTS to the Commission for adoption.

MiCA: ESMA consults on guidelines on criteria for assessment of knowledge and competence

The European Securities and Markets Authority (ESMA) launched a [consultation](#) on draft guidelines under MiCA for assessing the knowledge and competence of cryptoasset service providers' (CASPs) staff. ESMA seeks comments on the minimum requirements for staff knowledge and competence, as well as organisational requirements for maintaining and updating these standards. The guidelines aim to enhance investor protection and trust in the cryptoasset markets, with comments due by 22 April 2025.

MiCA: ESMA publishes supervisory briefing on authorisation of CASPs

The European Securities and Markets Authority (ESMA) published a [supervisory briefing](#) on the authorisation of cryptoasset service providers (CASPs) under the Markets in Cryptoassets Regulation (MiCA). Developed with national competent authorities (NCAs), the briefing aims to promote regulatory consistency and prevent arbitrage. It provides guidance on governance, outsourcing limits and the suitability of personnel, emphasising the need for CASPs to operate autonomously with sufficient in-country staff and for executive management to have technical knowledge of the crypto ecosystem.

DORA: EU Commission rejects draft RTS on assessment requirements when financial entities subcontract ICT services

The EU Commission [rejected](#) the European Supervisory Authorities' (ESAs) draft regulatory technical standards (RTS) on subcontracting ICT services under the Digital Operational Resilience Act (DORA), as outlined in a letter dated 21 January 2025. The Commission believes the draft RTS exceeds the ESAs' mandate by introducing requirements not specifically linked to subcontracting conditions. The Commission intends to adopt the RTS once the ESAs address its concerns and make the necessary modifications.

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Germany

BaFin updates guidance note on definition of investment advice

The German Federal Financial Supervisory Authority (BaFin) updated its [guidance](#) on what constitutes investment advice under the German Banking Act (KWG) and the German Investment Firm Act (WpIG). The revised note includes editorial updates and new information on the regulatory categorisation of investment recommendations by influencers, replacing the previous guidance from February 2019.

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Italy

MiCA: Bank of Italy and Consob issue joint communication on obligations for cryptoasset service providers

The Bank of Italy and Consob issued a joint [press release](#) on obligations for cryptoasset service providers (CASPs), following ESMA's recent statement on MiCA compliance. The release addresses CASPs and virtual asset service providers (VASPs), allowing services for liquidation of non-compliant

cryptoassets until the end of Q1 2025. ESMA emphasises the need for effective communication with investors and appropriate procedures for liquidation or conversion of cryptoassets.

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Luxembourg

Luxembourg bill implementing MiFID3/MiFIR2, Listing Directive and ESAP Directive published

Bill No. 8498 was lodged with the Luxembourg Parliament to implement recent EU directives and regulations, including the MiFID3/MiFIR2 package, the Listing Directive and the ESAP Directive. The bill aims to improve transparency rules, facilitate access to capital markets and provide centralised access to publicly available information. This marks the beginning of the legislative procedure.

CSSF publishes communiqué on treatment of fees for sustainability reporting services

The Commission de Surveillance du Secteur Financier (CSSF) issued a **communiqué** on fees for sustainability reporting services. It addresses statutory auditors and audit firms, as well as audit committees of public-interest entities (PIEs). The communiqué clarifies that fees for non-audit services provided over three consecutive years should not exceed 70% of the average audit fees and it aims to ensure a consistent approach to fee calculations under the Corporate Sustainability Reporting Directive (CSRD).

CSSF publishes communiqué on new transmission method for internalised settlement reporting under CSDR

The Luxembourg financial sector supervisory authority, the Commission de Surveillance du Secteur Financier (CSSF) **announced** a new transmission method for internalised settlement reporting (Article 9 CSDR) effective from 1 July 2025. Reports will be collected exclusively via ZIP file submissions through the eDesk procedure or automated API (S3 protocol). This change impacts quarterly reports from Q2 2025 and all resubmissions, with no reports accepted through historical channels. The CSSF will soon provide details for pre-production testing and a user guide.

Luxembourg law implementing MiCA, transfer of funds, ELTIF 2 and European Green Bonds regulations

The **law** of 6 February 2025, implementing recent EU regulations on cryptoassets, fund transfers, ELTIFs and European green bonds, was published in Luxembourg's official journal. It amends several existing laws to integrate the Markets in Cryptoassets Regulation (MiCA) and related EU regulations into Luxembourg law. The law entered into force on 10 February 2025, with some provisions retroactively effective from 30 June 2024 or 21 December 2024.

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UK

FCA publishes portfolio letter on asset management and alternatives

The Financial Conduct Authority (FCA) **published** a letter to Chief Executives setting out its current supervision priorities as regards its asset management and alternatives portfolio.

The letter sets out the FCA's key expectations in relation to the following supervisory priorities:

- supporting confident investing in private markets;

- building firm and financial system resilience against market disruption; and
- securing positive outcomes for consumers.

Unauthorised Co-ownership Alternative Investment Funds (Reserved Investor Fund) Regulations 2025 made and laid

The [Unauthorised Co-ownership Alternative Investment Funds \(Reserved Investor Fund\) Regulations 2025](#) (SI 2025/216) were introduced to support the new UK-based Reserved Investor Fund. This fund is structured as an unauthorised co-ownership alternative investment fund (AIF). The regulations ensure that investors have appropriate rights and liabilities and provide for contract making. They modify certain sections of the Financial Services and Markets Act 2000 to make the fund commercially viable. SI 2025/216 will come into force after the Co-ownership Contractual Schemes (Tax) Regulations 2025, pending parliamentary approval.

REUL Act: Regulations on assimilated law made and laid

The Retained EU Law (Revocation and Reform) Act 2023 (Consequential Amendment) Regulations 2025 ([SI 2025/82](#)) were laid before Parliament. SI 2025/82 replaces references to retained EU law with 'assimilated law' and removes references to repealed EU law principles. It aims to provide clarity without changing policy and is expected to come into force on 27 February 2025, pending parliamentary approval.

UK and EU issue joint statement on third Financial Regulatory Forum

HM Treasury (HMT) and the EU Commission issued a [joint statement](#) on the third UK-EU Financial Regulatory Forum, held in London on 12 February 2025. The Forum, established by a 2023 memorandum of understanding, serves as a platform for dialogue on financial services issues. Key discussion topics included regulatory cooperation, anti-money laundering, banking regulation, digital technology, sustainable finance as well as AI and cryptoassets regulation.

UK Government publishes first parliamentary review on dormant assets scheme

The UK Government published the first parliamentary [review](#) of the Dormant Assets Scheme (DAS), covering 24 February 2022 to 12 February 2025. The review found that the DAS provides operational value to industry participants and prioritises customer protection, though progress on expanding the scheme has been slower than expected. The DAS is anticipated to include its first investment participants in early 2025, with subsequent reviews every five years.

House of Commons Treasury Committee launches call for evidence on AI in financial services

The House of Commons Treasury Committee launched a [call for evidence](#) on artificial intelligence (AI) in financial services, aiming to explore opportunities and mitigate risks to financial stability and consumer protection. The Committee seeks views on AI's current and future use, its impact on productivity, risks to financial stability and benefits and risks to consumers, especially vulnerable ones. Responses are due by 17 March 2025.

House of Lords Financial Services Regulation Committee highlights concerns over FCA proposals to publish enforcement investigations

The House of Lords Financial Services Regulation Committee published a [report](#) criticising the FCA's proposals in consultation paper CP24/2 (Part 2) on publicising enforcement investigations. The report argues that the FCA has not justified the shift from its current policy and warns that the new approach

could cause significant reputational damage to firms and misalign with the FCA's competitiveness and growth objectives.

Law Commission publishes FAQs on digital assets in private international law

The Law Commission published [FAQs](#) on the relationship between private international law and areas like tax and financial regulation in the context of digital assets. These FAQs, part of the Commission's project on digital assets and electronic trade documents, explain differing approaches by revenue authorities, regulatory bodies and international law. The document is not peer-reviewed or a formal publication. A consultation paper on law reform proposals will be published in due course.

FCA sets out its expectations for authorised fund applications

The Financial Conduct Authority (FCA) issued a [document](#) outlining its expectations for firms applying for collective investment schemes to be authorised as unit trusts, contractual schemes and open-ended investment companies. It details the required application information, including fund names, investment objectives and strategies, among other criteria. The FCA emphasises that incomplete applications may be refused and aims to ensure comprehensive and accurate submissions for efficient authorisation processing.

Overseas Funds Regime: FCA publishes guidance on notifying of material changes to collective investment schemes

The Financial Conduct Authority (FCA) [updated](#) its Overseas Funds Regime (OFR) webpage to include guidance on notifying material changes to recognised collective investment schemes or sub-funds. Once a fund is recognised under the OFR, its operator must notify the FCA of certain changes using a Material Change Notification form, as outlined in the new guidance.

FCA consults on further changes to public offers and admissions to trading regime and UK Listing Rules as well as new public offer platform regime

The Financial Conduct Authority (FCA) published a consultation paper ([CP25/2](#)) with proposals to support the Public Offers and Admissions to Trading Regulations (POATRs) and amend UK Listing Rules. The proposals address disclosure requirements for low denomination bonds, inefficiencies in the listing application process and the need to publish Listing Particulars for certain securities. The FCA also released [CP25/3](#), consulting on further changes and transitional arrangements for operating a public offer platform. Comments on both consultations are due by 14 March 2025.

FCA publishes report on reducing money laundering through the markets

The Financial Conduct Authority (FCA) released a [report](#) updating its 2019 review on money laundering risks, focusing on brokers and capital market firms. It includes examples of good and poor practices, case studies and a detailed review of financial crime systems. The FCA also published a review on payment services and account providers' use of the National Fraud Database and money mule detection.

FCA publishes letter on approaches to supporting growth

The Financial Conduct Authority (FCA) [published](#) a letter outlining its approach to support growth in the UK, in response to a request from the Prime Minister. The FCA's planned work includes implementing a new prospectus regime, reducing conduct requirements for wholesale insurers and improving the

authorisation process for innovative firms. The letter also highlights areas where government assistance is needed, such as digital identity verification and enhancing the Companies House database.

PRA publishes letter on enhancing economic growth

The Prudential Regulation Authority (PRA) [outlined](#) its plans to support the competitiveness and growth of the UK economy in a letter to the Government. The PRA's 2025 activities include simplifying the prudential regime for small banks, enhancing the insurance sector's investment capacity and improving the framework for Insurance Special Purpose Vehicles (ISPVs). The PRA also aims to discuss broader changes with the Government, such as a 'concierge service' for new foreign firms and reducing regulatory overlaps.

Accelerated Settlement Taskforce recommends that UK move to T+1 on 11 October 2027

The Accelerated Settlement Taskforce (AST) Technical Group [published](#) its UK implementation plan for T+1 settlement, recommending the transition by 11 October 2027. The report outlines 12 critical and 27 highly recommended actions to ensure a smooth transition. The Government has welcomed the report and will respond soon.

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Asia Pacific

Hong Kong

SFC supports listing of alternative funds to broaden investor choice and bolster market development

The Securities and Futures Commission (SFC) issued a [circular](#) to clarify regulatory requirements for listing closed-ended collective investment schemes (alternative funds) on the Stock Exchange of Hong Kong Limited (SEHK). This aligns with the Government's plan to broaden private equity fund distribution. The SFC highlights that the current regime allows alternative funds to be authorised and listed without impediments and sets out requirements for authorising funds investing in private and less liquid assets. The Hong Kong Monetary Authority (HKMA) also issued a circular to ensure registered institutions comply with these requirements.

MPFA revises Code on MPF investment funds

The Mandatory Provident Fund Schemes Authority (MPFA) updated its [Code](#) on MPF investment funds, including principles for permissible asset classes and clarifications based on recent regulatory and market developments. These revisions, aimed at enhancing transparency, take effect from 14 February 2025.

SFC highlights cybersecurity incidents involving licensed firms and resulting business disruptions

The Securities and Futures Commission (SFC) published a [report](#) on its 2023/24 thematic cybersecurity review of licensed corporations (LCs), highlighting standards for phishing detection, EOL software, remote access and cloud security. The report notes eight significant cybersecurity incidents between 2021 and 2024, including unauthorised trades and ransomware attacks. The SFC will host cybersecurity webinars in February 2025 and plans a comprehensive review of cybersecurity requirements later in the year.

HKMA and PBoC announce measures to deepen financial cooperation between Hong Kong and Mainland China

The Hong Kong Monetary Authority (HKMA) and the People's Bank of China (PBoC) **announced** new measures to enhance financial market connectivity between Hong Kong and Mainland China. These include a RMB100 billion trade financing facility, enhancements to Southbound Bond Connect and the implementation of faster payment systems. Some services are expected to launch by mid-2025.

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Singapore

Financial Institutions (Miscellaneous Amendments) Act 2024 (Commencement) Notification 2025 gazetted

The Singapore Government announced that the **Financial Institutions (Miscellaneous Amendments) Act 2024** (FIMA Act) will take effect on 24 January 2025. The FIMA Act enhances the investigative powers of the Monetary Authority of Singapore (MAS) across six MAS-administered Acts, including the Financial Advisers Act and the Securities and Futures Act. Key amendments include widening MAS's powers regarding the appointment and removal of financial institution officers and requiring MAS approval for obtaining effective control of certain financial entities.

Consequential changes arising from commencement of second phase of Financial Institutions (Miscellaneous Amendments) Act 2024

The Singapore Government **announced** that the second phase of the Financial Institutions (Miscellaneous Amendments) Act 2024 (FIMA Act) will commence on 24 January 2025, with all sections in effect except section 32. In connection with this, several amendment regulations and updated MAS notices, guidelines, FAQs and compliance toolkits have been issued to reflect the changes. New forms for MAS approval related to effective control and appointments in financial institutions have also been introduced.

MAS launches Global-Asia Digital Bond Grant Scheme to boost issuance and market adoption of digital bonds in Singapore

The Monetary Authority of Singapore (MAS) launched the **Global-Asia Digital Bond Grant Scheme** to promote the issuance and adoption of digital bonds in Singapore. The scheme offers grants to qualifying issuers meeting specific conditions, such as issuing bonds on designated digital platforms and aligning with international standards. Eligible issuers can apply for up to 30% of total expenses per issuance, with the scheme valid until 31 December 2029.

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Clifford Chance publications

- (24 February) Briefing - **Executive order expands presidential power over independent regulatory agencies**

- (24 February) Briefing - [New Trump Policy Signals Significant Changes to CFIUS and the New Outbound Investment Security Program](#)
- (18 February) Briefing - [ESMA Consults on "Simplified" Disclosure Requirements for Private Securitisations](#)
- (17 February) Briefing - [The New UK Prospectus Regime and UK Listing Rules – Filling in the Blanks, Part 2: The “Retail Piece” – CP25/2](#)
- (12 February) Briefing - [Guide to Equity-Linked Products in Asia Pacific - Second Edition](#)
- (6 February) Briefing - [Ukraine – the latest global sanctions and export controls as at 2:30am GMT, February 06, 2025.](#)
- (30 January) Briefing - [The reverse solicitation exemption under MICA – what third-country firms need to know](#)
- (29 January) Briefing - [President Trump's first seven days in office: What's out, what's in and what's still in](#)

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Clifford Chance events and recordings

- (25 February) [2025 Fund industry predictions videos by Luxembourg global funds' conference speakers](#)

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ESG Index

- **International:**
 - The Financial Services Regulatory Authority published concerning funds domiciled in or marketed into or from the ADGM, Abu Dhabi's International Financial Centre which claim ESG characteristics.
- **European Union**
 - The EU Commission has adopted the first two omnibus packages of proposals intended to simplify EU rules and boost competitiveness and unlock additional investment capacity.
 - EBA reports on data availability and feasibility of common methodology for ESG exposures

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