afme/

Annual Review 2026

Towards Simpler, More Efficient Capital Markets in Europe

The voice of the leading banks in Europe's financial markets.

AFME Board

Fixed Income

- Fixed Income Trading
- Primary Dealers
- Credit
- High Yield
- Securitisation

Equities

- Equities Trading
- Equities Capital Markets

Post Trade

Capital and Risk Management

- Prudential Regulation
- Prudential Supervision
- Resolution

Compliance, Control, Accounting & Tax

- Compliance, Control & Accounting
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Technology & Operations

- Technology & Operations

FX

- GFXD (Global)

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- Commodities

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- Supervision
- MiFID and Wholesale Investor Protection
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EU Advocacy

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Message from the Chair

Juan Blasco
Chair of AFME Board
BBVA, Head of Global Institutional Business in Corporate & Investment Banking

I am delighted to introduce this year's Annual Review at a pivotal moment for Europe's economy and financial markets.

Against a backdrop of heightened geopolitical uncertainty, increasing global competition and substantial investment needs, there is a growing understanding that well-functioning capital markets are essential to driving economic growth, strengthening competitiveness and supporting Europe's long-term resilience.

Achieving strategic priorities - from boosting productivity and innovation to financing the green and digital transitions - depends on the ability to mobilise private capital efficiently and at scale. As a result, the policy debate is increasingly focused on how Europe can translate this shared ambition into tangible progress. This has brought renewed focus to the competitiveness of Europe's financial sector, the integration of capital markets and the need for a regulatory framework that supports, rather than constrains, growth.

For AFME and its members, this shift is particularly significant. For many years, we have championed deeper capital markets, proportionate regulation and policies that strengthen Europe's ability to attract investment and compete globally. It is encouraging to see many of these priorities moving to the centre of the policy agenda.

The achievements highlighted in this review demonstrate the value of sustained engagement between industry and policymakers. Through our expertise and engagement, we have helped advance practical solutions to complex challenges, from promoting market integration and regulatory simplification to supporting innovation, resilience and sustainable growth.

Looking ahead, the challenge will be to convert ambition into delivery. Europe has a unique opportunity to build deeper and more competitive capital markets that support investment, innovation and long-term growth. AFME remains committed to working alongside policymakers and market participants to help deliver that opportunity into reality and strengthen Europe's position in an increasingly competitive global economy.

"There is a growing understanding that well-functioning capital markets are essential to driving economic growth, strengthening competitiveness and supporting Europe's long-term resilience"

Message from the CEO

Adam Farkas
Chief Executive Officer, AFME

This year has marked an important turning point in the European policy debate. As competitiveness, growth and investment have moved to the top of the agenda across the European Union and the United Kingdom, AFME has worked to ensure that wholesale financial markets remain at the centre of policymakers' thinking given their critical role in channelling private sector savings to productive investments and achieving Europe's broader economic objectives.

One of the most important developments of the past year has been the emergence of simplification, and global and EU market integration as key policy priorities and the launch of a deeper reflection on how to deliver on the crucial imperative of strengthening the competitiveness of Europe's banking sector. AFME has been actively engaged in shaping initiatives aimed at reducing unnecessary complexity, improving regulatory consistency and supporting the development of deeper and more integrated capital markets. Through our work on the EU Savings and Investment Union, market infrastructure reform and broader simplification initiatives, we have helped advance a policy agenda designed to unlock investment and support economic growth.

We have also continued to advocate for a globally competitive banking sector and a level playing field. Our engagement on Basel III implementation, reforms to the UK capital framework and international competitiveness has focused on ensuring that regulatory frameworks maintain resilience while supporting the financing capacity of Europe's banking sector.

This year has also seen important momentum behind the securitisation reform in both the European Union and the United Kingdom. AFME and its members have played a leading role in demonstrating how robust securitisation markets can unlock capital, support lending and help meet Europe's broader investment needs.

"This year has marked an important turning point in the European policy debate"

At the same time, we have continued to shape the future of digital innovation in capital markets. Through our work on tokenisation, digital market infrastructure and emerging technologies, AFME has helped ensure that innovation remains focused on delivering tangible benefits for markets and the wider economy.

Finally, our work to promote liquid and efficient markets has remained a central priority. Through our engagement on market structure reforms, MiFIR implementation and post-trade developments, including preparations for T+1 settlement, we have continued to support the efficient functioning and global competitiveness of Europe’s capital markets.

These achievements demonstrate the value that AFME delivers on behalf of its members: providing technical expertise, building industry consensus and helping shape policy outcomes that support growth, competitiveness and financial stability.

I would like to thank our members for their continued engagement and support, our Board of Directors for their guidance and leadership, and the AFME team for their exceptional commitment and expertise.

“Through our work on tokenisation, digital market infrastructure and emerging technologies, we have helped ensure that innovation remains focused on delivering tangible benefits for markets and the wider economy”

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Delivering growth, integration and simplification

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- MiFIR implementation
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- Commodities

Highlights

Delivering growth, integration and simplification

Market Integration and Supervision Package (MISP)

Over the last year, the European Commission published its Market Integration and Supervision Package (MISP) as part of the Savings and Investments Union strategy to create a more integrated, efficient and competitive financial system. AFME actively engaged with policymakers both ahead of and following the publication of the proposals, drawing on its response to the Commission's targeted consultation. Our advocacy has focused on strengthening competition, expanding choice for investors and market participants, and fostering innovation across EU capital markets. As a result, we secured more than 60 engagement meetings.

In March 2026, AFME published its position paper on the MISP covering equity market structure, post-trade, distributed ledger technology (DLT) and supervision. In addition, AFME and the European Fund and Asset Management Association (EFAMA) published a joint statement on equity market structure.

A key focus of AFME's advocacy has been the review of the EU equity market structure framework. We engaged extensively with Member States, the European Parliament, the European Commission and ESMA to ensure EU equity markets remain attractive to issuers and investors. Drawing on our position paper, joint industry advocacy and data-driven educational materials, including our publication EU Equity Market Structure: Challenging the Myths, AFME promoted a fact-based policy debate. Throughout these discussions, we consistently advocated for a balanced regulatory framework that supports innovation and competition and enhancing the international competitiveness of EU capital markets.

This approach was reflected in the European Commission's original proposal, which sought to limit structural changes to EU equity markets and instead focused on targeted measures, notably the extension of the Consolidated Tape framework, a longstanding AFME recommendation aimed at improving market transparency.

The campaign achieved significant media visibility across major European and UK outlets, including Bloomberg, Sunday Times, Politico, Reuters, Börsen-Zeitung, El País and Les Échos. This helped ensure AFME's position was visible in the public debate in Europe, the UK and key national markets.

AFME also advocated for greater ambition in the post-trade landscape, where removing barriers and reducing costs remains essential. Our advocacy efforts focused on promoting greater transparency and comparability of CSD fees, supported by AFME's CSD cost study, as well as on clarifying the different roles and functions played by custodian banks, through an educational publication. In our engagement with policymakers, we stressed how these elements can contribute to a more efficient and integrated post-trade environment.

Market Integration and Supervision Package (MISP)

Timeline of key moments

December 2025
Educational Seminar co-organised by AFME 'Into the plumbing of financial markets: the European Post-Trading Landscape'

December 2025
European Commission adopts the Market Integration and Supervision Package (MISP), including a Master Regulation, Master Directive and the Settlement Finality Regulation.

March 2026
Publication of AFME MISP position paper together with a joint statement with EFAMA on equity market structure

April 2026
ESMA launches its Call for Evidence on the market structure of European equity markets

June 2026
ECON rapporteurs publish draft reports on the MISP legislative proposals, including the Master Regulation and Master Directive.

Market Integration and Supervision Package (MISP)

Timeline of key moments

June 2026
AFME publishes its response to ESMA's Call for Evidence on equity market structure

July 2026 –
European Parliament publishes its amendments to the Master Regulation, Master Directive and the Settlement Finality Regulation.

September 2026
EU consolidated tape for shares and ETFs expected to launch, marking a significant milestone in improving equity market transparency and supporting more integrated European capital markets

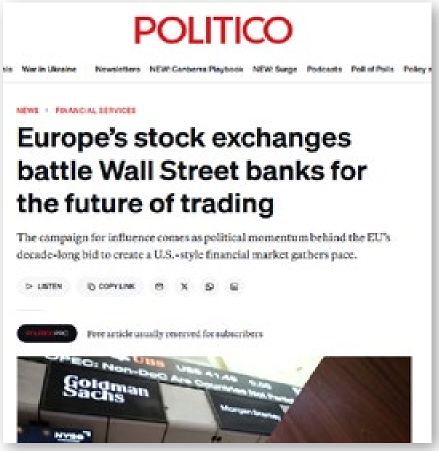
Early 2028
UK equities consolidated tape expected to be delivered

We called for reforms that enhance market efficiency and support deeper capital market integration, including greater interoperability between central counterparties clearing houses (CCPs). Together with other industry associations, AFME co-signed a joint statement urging policymakers to advance CCP interoperability arrangements in Europe as a means of promoting competition, and reducing fragmentation.

Given the transformative potential of DLT for post-trade, we also advocated for greater ambition in the development of DLT settlement schemes. In particular, we called for future regulatory regimes to support innovation while facilitating market-led adoption.

In parallel, AFME joined other trade associations in issuing a joint statement focused enhancing the supervisory framework to support EU Market Competitiveness including a call for the introduction of a competitiveness objective within ESMA's mandate.

Encouragingly, many of AFME's recommendations on CSD fee transparency, CCP interoperability, and DLT-enabled post-trade services, and the evolution of ESMA's powers are attracting growing support among policymakers.


POLITICO

Europe's stock exchanges battle Wall Street banks for the future of trading

The campaign for influence comes as political momentum behind the EU's decade-long bid to create a U.S.-style financial market gathers pace.


Börsen-Zeitung

Gespräch Adam Farkas, AFME

„Internalisierer entziehen dem Markt keine Liquidität"


Reuters

European banks urge regulators not to intervene in equity markets


THE TIMES

Dark trades crackdown would be 'anti-competitive'

Lobbyists for the banking sector hit back at claims everyday investors are being unfairly treated

Sustainability Omnibus and broader simplification agenda

The past year has seen the European Commission deploy a broad range of instruments to advance its simplification agenda. Following the presentation of the Omnibus I – or “Sustainability Omnibus” – in February 2025 to streamline sustainability reporting and due diligence requirements, the Commission has since tabled a further 11 Omnibus simplification packages covering areas including digital and tax regulatory frameworks.

The Sustainability Omnibus remained a key focus of AFME’s advocacy efforts throughout the final stage of negotiations in autumn 2025, culminating in a political agreement in December. AFME worked closely with members to refine priorities for the trilogue phase and engage key MEPs, including through a strengthened advocacy presence in Strasbourg.

The final agreement incorporated several changes to the Corporate Sustainability Reporting Directive (CSRD) that align with AFME’s recommendations for a more streamlined and decision-useful framework. These include extending the subsidiary exemption to entities with listed securities, introducing an exemption for certain EU and non-EU financial holding companies, and establishing an optional transition exemption for “wave one” companies falling outside the revised reporting thresholds. Co-legislators also confirmed the removal of the mandate to develop additional sector-specific sustainability reporting standards and agreed a robust mandate for the streamlining of the existing European Sustainability Reporting Standards (ESRS).

Under the Corporate Sustainability Due Diligence Directive (CSDDD), AFME successfully advocated for the retention of key simplification measures, including the removal of the review clause on the potential extension of the Directive’s scope to downstream financial services. The final text also confirmed the removal of the specific EU-harmonised civil liability regime originally foreseen under the Directive.

AFME remained actively engaged in discussions on climate transition plan requirements, which were ultimately removed from the CSDDD but retained under CSRD disclosures. Throughout the negotiations, we consistently called for a more proportionate approach, avoiding inconsistencies and duplication between the two frameworks and opposing overly prescriptive requirements regarding transition plan implementation.

Sustainability Omnibus and broader simplification agenda

Timeline of key moments

July 2025
Commission adopts targeted amendments to the Taxonomy Disclosures Delegated Act (“Omnibus Taxonomy Delegated Act”)

July 2025
EFRAG launches public consultation on technical advice to the Commission on the simplification of the ESRS

November 2025
Trilogue negotiations on the Omnibus I Directive start

November 2025
Commission adopts proposal to review the SFDR

December 2025
EU co-legislators strike a political agreement on the Omnibus I Directive

Sustainability Omnibus and broader simplification agenda

Timeline of key moments

December 2025
EFRAG delivers final technical advice to the Commission on the simplification of the ESRS

January 2026
Omnibus Taxonomy Delegated Act published officially

February 2026
Omnibus I Directive published officially

June 2026
Member States reach common position on SFDR review

July 2026
Commission adopts final Delegated Act simplifying the ESRS under CSRD

The final Omnibus text also introduced a new recital, broadly in line with AFME's recommendations, which highlights the need to consider adapting sector-specific financial services legislation and supervisory expectations to ensure consistency with the revised CSRD framework.

Alongside the trilogue negotiations, we have engaged extensively on related simplification initiatives, including the review and streamlining of the ESRS and the Commission's targeted amendments to the Taxonomy Disclosures Delegated Act. Coordinating efforts with other financial sector associations as well as cross-industry partners, AFME supported the confirmation of measures introducing optional reporting relief for financial institutions and further postponement of particularly complex reporting KPIs.

In the first half of 2026, we have continued to support advancing the competitiveness and simplification objectives underpinning the Omnibus agenda. This included input to the Commission as they finalised the simplified ESRS, our sustained engagement on the "substantive" review of the Taxonomy Disclosures Delegated Act (expected to be completed in 2027), the review of the Sustainable Finance Disclosure Regulation (SFDR), as well as the development of recommendations on ESG-related provisions under CRR3/CRD6 and related supervisory guidelines in the context of the Commission's reflections on banking sector competitiveness.

> *"We have continued advancing the competitiveness and simplification objectives underpinning the Omnibus agenda"*

AFME Simplification Campaigns

Regulatory simplification was a defining theme of AFME's communications and advocacy work this year, reflecting a wider policy debate on Europe's competitiveness, growth and capacity to mobilise investment. While strong regulation remains essential to financial stability, the cumulative complexity of Europe's financial services framework has createt unnecessary operational burdens, reductions in efficiency and make it harder for our members and European capital markets to support businesses, investors and the wider economy. AFME's campaigning activity therefore focused on making the case for smarter, more proportionate regulation: frameworks preserving regulatory objectives and resilience of the sector while removing unnecessary duplication, improving usability and supporting Europe's long-term competitiveness.

Throughout the year, AFME used a range of communications channels to build visibility around this agenda and bring industry perspectives into the public debate. This included a five-part LinkedIn series highlighting striking facts and figures on regulatory complexity, which generated strong engagement and helped frame the issue in accessible terms. The campaign underlined how time spent navigating unnecessary regulatory complexity is time not spent innovating, investing or better serving clients.

AFME also brought the message to life through multimedia content and senior-level thought leadership. The video "Under the Burden: Industry Voices on Financial Regulation Complexity" featured members and AFME staff sharing practical examples of how complexity affects day-to-day operations and why simplification matters for competitiveness. In parallel, Adam Farkas used an opinion piece and an AFME Voices podcast episode to explain why Europe's banking rulebook needs a bold reset, setting out how more streamlined, proportionate rules can support stability, competitiveness, growth and deeper capital markets.

"AFME put industry perspectives at the heart of the debate, driving visibility for this agenda across multiple channels"

This communications activity culminated in the summer publication of *From Banks to Businesses: Examples of Financial Regulation Impacting the Real Economy*. The report presents insights from a series of interviews with client-facing bankers from across AFME's membership, covering a wide range of business lines, such as infrastructure finance, trade finance, corporate banking, structured finance, equity capital markets, custody and asset servicing. Through practical examples from their day-to-day interactions with clients, the report illustrates how the cumulative impact of regulatory constraints can affect not only banks, but also EU businesses and investors, with wider implications for the real economy and Europe's competitiveness. AFME supported the launch with a further social media LinkedIn campaign, highlighting findings across key sectors and showing how simplification is not only an industry priority, but a real-economy issue. Together, these activities strengthened AFME's voice in the simplification debate and helped position the association as a leading advocate for the sector in favour of regulation that is clear, efficient and growth-supportive.

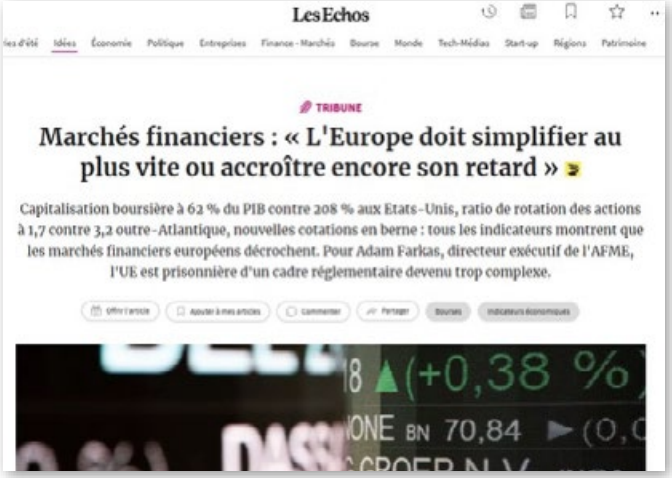

CincoDías

Empresas y finanzas

FINANZAS ›

La banca europea reclama a Fráncfort y Bruselas una "reducción significativa" de la carga de capital

Adam Farkas, director general de AFME, asociación que agrupa a los principales bancos europeos, asegura que "hay espacio" para relajar los requerimientos


Les Echos

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TRIBUNE

Marchés financiers : « L'Europe doit simplifier au plus vite ou accroître encore son retard »

Capitalisation boursière à 62 % du PIB contre 208 % aux Etats-Unis, ratio de rotation des actions à 1,7 contre 3,2 outre-Atlantique, nouvelles cotations en berne : tous les indicateurs montrent que les marchés financiers européens décrochent. Pour Adam Farkas, directeur exécutif de l'AFME, l'UE est prisonnière d'un cadre réglementaire devenu trop complexe.

"We positioned AFME as a leading advocate for regulation that is clear, efficient and growth-supportive"

UK Financial Services Growth Strategy

Over the past year, AFME has played a leading role in supporting the UK Government's ambition to drive economic growth through more competitive, efficient and internationally attractive financial markets. Building on a decade of financial sector reform, our advocacy has focused on ensuring that the current phase of policy reforms delivers tangible benefits for members, investors and the wider economy.

AFME's UK KPI Report highlighted the UK's continued position as a leading global financial centre, underpinned by strong financial services exports and deep capital markets. However, the report also identified persistent structural challenges. IPO activity remains historically low, and the UK continues to fall behind the US in attracting and scaling high-growth companies. The analysis also pointed to evolving household investment patterns and increased international competition in areas such as tokenisation and distributed ledger technology (DLT)-based capital markets. Taken together, these findings underline the importance of continued reform and innovation to enhance competitiveness and support long-term growth.

AFME has been closely engaged in discussions on the future of the UK's prudential framework. In response to the Financial Policy Committee's review of bank capital requirements, we have advocated for a more proportionate, coherent and growth-oriented regulatory approach. Our engagement has emphasised that resilience and competitiveness are complementary objectives. Reforms to capital requirements, leverage ratios, Pillar 2 arrangements and liquidity regulation should safeguard financial stability while enabling firms to deploy capital efficiently in support of lending, underwriting, market-making and long-term investment. We also welcomed Katharine Braddick's appointment as Chief Executive Officer of the Prudential Regulation Authority and met with her shortly after she assumed her role.

> *"AFME has been driving the debate on the future of the UK prudential framework"*

UK Financial Services Growth Strategy

Timeline of key moments

January 2026
Prospectus and Admission to Trading Reforms go live.

April 2026
AFME advocates for proportionate prudential reform through the FPC capital review, Pillar 2A reform and liquidity framework discussions.

July 2026
FPC publishes assessment of bank capital requirements. Katharine Braddick appointed CEO of the PRA. Rachel Reeves Mansion House speech reinforces the Government's growth agenda and focuses on investment, competitiveness and capital markets.

Summer 2026
Andy Burnham becomes Prime Minister, Lucy Rigby reappointed as City Minister; AFME publishes A Renewed Agenda for UK Financial Markets and engages the new Government on growth-focused market reforms.

Beyond prudential reform, AFME has advanced a broader programme to strengthen UK financial markets by supporting greater market liquidity, more attractive public markets, digital and DLT-based infrastructure, and a more streamlined regulatory framework. We have welcomed reforms to the Senior Managers & Certification Regime, greater clarity around the scope of the Consumer Duty, and the Government's roadmap for the issuance of a digital gilt.

AFME has also supported reforms to the UK Listing Rules and the new prospectus regime, which came into force earlier this year. We have been a leading advocate for regulatory simplification, including transaction reporting reform and the reduction of duplicative compliance requirements. At the same time, we have championed market infrastructure improvements that enhance efficiency, strengthen resilience and encourage greater participation in UK capital markets.

Since the new Government took office in July 2024, AFME has continued to emphasise the vital role that wholesale financial markets play in supporting economic growth across the UK. This was reflected in the publication of our report, *A Renewed Agenda for UK Financial Markets*. The report found that, while London remains a global financial centre, the benefits of public markets are distributed across the country. Around half of the 410 listed companies analysed are headquartered outside the capital, representing approximately £720 billion of the UK's total £1.59 trillion market capitalisation. These findings demonstrate that access to public markets is a national growth issue, supporting regional employers, investment and business expansion throughout the UK.

> *"AFME has advanced a broader programme to strengthen UK financial markets by supporting greater market liquidity, more attractive public markets, digital and DLT-based infrastructure, and a more streamlined regulatory framework"*

Highlights

Strengthening the Competitiveness of Europe's Banking Sector

Strengthening the Competitiveness of Europe's Banking Sector

Timeline of key moments

March 2026
AFME publishes thought leadership report on reforming the EU capital stack.

April 2026
AFME submits its response to the European Commission consultation on the competitiveness of the EU banking sector.

17 July 2026
European Commission publishes its banking competitiveness Communication and accompanying staff working document.

July-August 2026
AFME developed detailed policy papers across prudential, supervisory and resolution topics.

September 2026
AFME publishes recommendations for policymakers and begins coordinated outreach to the European Parliament, Commission, member states and supervisory authorities.

One of AFME's major advocacy priorities during 2026 was, and continues to be, the debate on the competitiveness of the European banking sector and ensuring that the EU's regulatory framework enables banks to finance growth, innovation, and the green and digital transitions. Following the European Commission's publication of its Communication on the Competitiveness of the Banking Sector and the Single Market in Banking in July 2026, AFME has been focusing its advocacy efforts to translate the Commission's diagnosis into a concrete reform agenda.

AFME welcomed the Commission's recognition that, while European banks are resilient, profitable and well-capitalised, their ability to support the wider economy continues to be constrained by market fragmentation, trapped capital and liquidity, regulatory complexity and the cumulative burden of overlapping supervisory and regulatory requirements. AFME has consistently argued that enhancing competitiveness is not synonymous with deregulation. Rather, it is about creating the conditions for banks to operate efficiently across borders, support clients at scale and compete internationally while maintaining high standards of financial stability and resilience.

AFME has played a leading role in developing industry recommendations and coordinating member views, as demonstrated by the numerous citations of AFME's reports and data in the Commission's final working documents accompanying their Competitiveness report. The work underpinning AFME's response to the Commission's consultation was itself the result of an extensive member-driven exercise. Beginning in December 2025, AFME undertook a structured review of the factors affecting the competitiveness of the EU banking sector, engaging extensively with members through dedicated taskforces, working groups and committee discussions. This process enabled AFME to identify members' key priorities, assess areas where regulatory, supervisory and market barriers may be impeding competitiveness, and develop evidence-based positions across a wide range of prudential and resolution topics. The resulting consultation response reflected a broad industry consensus and provided a comprehensive framework for AFME's subsequent advocacy work, covering issues ranging from Banking Union integration and cross-border capital allocation to supervisory simplification, capital stack reform, resolution policy, reporting requirements and the international competitiveness of the EU prudential framework. The Commission's Communication ultimately addressed many of the themes consistently raised by AFME and its members throughout this process, providing a strong foundation for the next phase of engagement.

The publication of the Commission's Communication also generated significant media and stakeholder interest. AFME's reaction achieved strong visibility across major international and European financial media, reinforcing the association's position as a leading voice in the debate.

Looking ahead, AFME's focus is shifting from policy development to implementation and advocacy. By early September 2026, AFME will finalise the remaining policy positions that will form part of its comprehensive response to the Commission's competitiveness report. This response paper will be used as the basis for coordinated engagement with policymakers across the EU institutions and member states. The paper will also underpin AFME's contribution to the Commission's forthcoming "Have Your Say" process and support a broad advocacy campaign through the autumn. This will be followed by preparing for the legislative process which will start in Q1 2027.

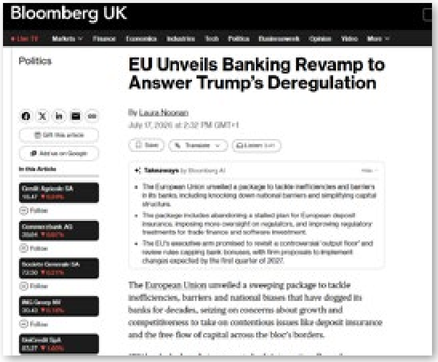
Strengthening the Competitiveness of Europe's Banking Sector

Timeline of key moments

September onwards
AFME intensifies engagement ahead of the Parliament's own-initiative report and the Commission's planned legislative proposals.

Early November 2026
ECON adoption of (INI) report on the competitiveness of the EU banking sector.

Q1 2027
Commission to propose legislative amendments to banking regulatory framework



Highlights

Driving Securitisation Reform across the EU and the UK

AFME's advocacy delivered tangible progress in securitisation reform on both sides of the Channel. In the European Union, AFME's long-standing call for a more risk-sensitive and proportionate framework was reflected in the European Commission's legislative proposal, which embraced the holistic approach advocated by AFME's 5-point plan and incorporated several key industry priorities. This marked an important shift in the policy debate, with policymakers increasingly recognising the role that securitisation can play in increasing lending capacity, mobilising private capital and advancing the objectives of the Savings and Investments Union.

Through sustained engagement with policymakers throughout the Council and European Parliament negotiations, and through evidence-based advocacy, AFME ensured that members' priorities remained at the forefront of the legislative debate. Alongside a successful LinkedIn campaign highlighting securitisation's contribution to the real economy, AFME also succeeded in bringing several important issues into the trilogue negotiations that had not been addressed in the Commission's original proposal, such as the proposed reforms to the treatment of securitisation under the UCITS Directive and amendments to the Credit Conversion Factor (CCF).

"AFME's advocacy delivered tangible progress in securitisation reform on both sides of the Channel"

Driving Securitisation Reform across the EU and the UK

Timeline of key moments

EU:

June 2025
The European Commission adopted its **legislative proposal** to reform the EU securitisation framework.

October 2025
The European Commission adopted the Solvency II **Delegated Regulation** amending the **Solvency II Delegated Regulation (EU) 2015/35** which supplements the **Solvency II Directive (2009/138/EC)**. The revised Solvency II **Delegated Act** was published in the Official Journal of the EU in February 2026. The Delegated Regulation will apply from **January 2027.**

November 2025
The ECB published its **opinion** on the Commission's securitisation proposals.

December 2025
The Council of the EU **agreed** its negotiating mandate on the revised **SECR** and **CRR** proposals.

December 2025
ECB launched its **SRT fast-track process** for standardised synthetic securitisations.

March 2026
The European Commission adopted the **Clean Energy Investment Strategy**, including securitisation-related proposals.

May 2026
The European Parliament adopted its positions on the **CRR** and **SECR** proposals.

June 2026
Trilogues on the EU securitisation reforms commenced.

Driving Securitisation Reform across the EU and the UK

Timeline of key moments

UK:

- **July 2025** – The PRA published **PS12/25** on unfunded credit protection in synthetic SRT securitisations and related supervisory expectations, with amendments to **SS9/13** taking effect from **January 2026**.

- **October 2025** – The PRA published near-final **PS19/25**, providing feedback to industry responses to PRA **CP13/24** and setting out its proposed approach to restating relevant CRR provisions.

- **January 2026** – The PRA published **PS3/26**, setting out the final policy for the restatement of the remaining relevant CRR provisions in the PRA Rulebook.

- **February 2026** – The FCA and the PRA published **CP26/6** and **CP2/26** proposing reforms to the UK securitisation framework. The consultation closed in May, and final policy statements are expected in **Q4 2026**.

- **May 2026** – HM Treasury published a **Statutory Instrument** making permanent the UK's previously temporary recognition of EU STS securitisations. The regulation came into force on **30 June 2026**.

In the United Kingdom, AFME coordinated a broad industry response to the consultations led by the Financial Conduct Authority (FCA) and the Prudential Regulation Authority (PRA) on the second phase of securitisation reforms. AFME welcomed the UK's proposed move towards a more principles-based regime and used its coordinated consultation response to identify targeted refinements that could further enhance the effectiveness and proportionality of the framework. Alongside this work, a dedicated PRA roundtable hosted by AFME brought together issuers and investors from across the market, giving members and non-members a direct channel to raise outstanding prudential issues and helping to ensure that industry perspectives were reflected in the ongoing reform process.

> *"AFME welcomed the UK's proposed move towards a more principles-based regime and used its coordinated consultation response to identify targeted refinements that could further enhance the effectiveness and proportionality of the framework"*

Highlights

Leveraging Digital Innovation to Fund the Economy

Leveraging Digital Innovation to Fund the Economy

Timeline of key moments

March 2023
EU DLT Pilot Regime begins

November 2024
UK digital gilt announced

March 2025
DIGIT market engagement launched

June 2025
Pontes and Appia strategy approved

July 2025
DIGIT design features developed

December 2025
European Commission publishes the Market Integration and Supervision Package, proposing significant reforms to the EU DLT Pilot Regime

March 2026
Appia roadmap published

Q3 2026
Pontes planned to launch

By Q1 2027
First UK digital gilt issuance: HM Treasury plans the first DIGIT transaction on HSBC Orion

2028
Appia blueprint expected

AFME played a central role in promoting the transformational policy proposals aimed at creating a network-based architecture for capital markets leveraging on the opportunities offered by the Distributed Ledger Technology (DLT). The changes to the DLT Pilot Regime included in the MISP package proposed by the European Commission – and in particular the introduction of “settlement schemes” - largely reflected the vision and the policy recommendations we proposed in recent years: a fundamentally enhanced capital markets architecture which promotes integration, innovation, resilience and competition.

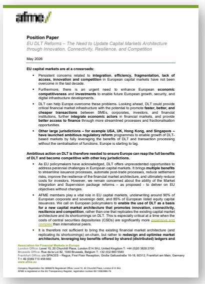
Our intensive dialogue with the European Parliament and Council has aimed at defending and improving the positive elements in the EC proposal and the ongoing legislative negotiations promise to maintain such important proposals which will help address the long-standing fragmentation, lack of efficiency, innovation and competition that have affected EU markets.

We have continued to promote constructive discussions with senior officials in the EU member States (including with the new Franco-German Task Force on Digital Finance) and in the UK to provide a constructive industry view on how digital innovation can promote growth and access to finance.

AFME has continued to promote a close dialogue with the ECB and national central banks to achieve a broad range of cash settlement solutions of DLT-based transactions, including a wholesale CBDC. We also advocated strongly for the ability of DLT-based securities to qualify as central bank collateral. On both fronts important progress has been achieved, with the launch of the Pontes and Appia projects and developments in the ECB policy on collateral.

Similar objectives have been promoted in the UK, where authorities have been implementing a positive Digital Securities Sandbox in the UK and designing a new framework for crypto-assets.

Given our previous engagement with the UK HM Treasury to encourage the issuance of DLT based sovereign debt, we welcomed the announcements on the implementation of a Digital Gilt Instrument pilot. HM Treasury has confirmed that the first digital gilt issuance will take place by Q1 2027.



Highlights

Promoting Liquid and Efficient Markets

MiFIR implementation
Timeline of key moments

September 25
EU: AFME/FIA/GFMA/ISDA response to the ESMA Call for Evidence on Transaction Reporting

November 25
EU: Transparency regime for bonds and equities go-live (Part I)

December 25
EU/UK: Last edition of AFME's MiFID Implementation Guide

UK: Transparency regime for bonds go-live

EU: Commission's proposal on market integration and supervision package (MISP)

EU: Political agreement on the Retail Investment Strategy (RIS)

February 26
UK: AFME response to FCA CP 25/32 on transaction reporting

March 26
EU: Transparency regime for bonds and equities go-live (Part II)

MiFIR implementation

AFME has continued to support members through a significant period of EU and UK MiFID/MiFIR reforms, helping firms navigate implementation while advocating for proportionate, workable and evidence-based policy outcome.

In the context of the EU MiFID II/R Review, the implementation of new regulatory technical standards remained a central priority, with important changes covering equity and fixed income transparency, consolidated tapes and the reasonable commercial basis for market data. . With implementation efforts still underway, the European Commission's Market Integration and Supervision Package (MISP) reopened, amongst others, key MiFIR market structure topics. AFME has been actively contributing to these negotiations, stressing that any future reform should be targeted, evidence-based and carefully calibrated, to ensure the diverse trading models that support liquidity and investor choice are preserved

In the UK, the FCA reforms to the UK MiFIR framework have started to apply, including the new post-trade transparency regime for bonds in December 2025, and the bond consolidated tape, launched in June 2026. Over the summer, the FCA also published its much-awaited consultation equity market structure and transparency as well as policy statement on the equities consolidated tape. AFME is currently reviewing these documents with members.

Additionally, AFME has focused on securing meaningful simplification of transaction reporting requirements in both the EU and UK.

In the UK, in response to the FCA's consultation, AFME called for a more targeted and proportionate framework, including a reduction in reporting fields and a narrower scope of reportable instruments. The FCA's Policy Statement, published in August 2026, confirmed these reforms, marking a significant positive outcome for AFME members and an important step towards a more efficient regime. The FCA and Bank of England Taskforce, launched in July, will now shape the longer-term objective of greater harmonisation across UK transaction reporting regimes. This work will be further strengthened by the appointment of AFME's Giulia Pecce to the Taskforce, where she will help ensure that sell-side perspectives inform the future UK framework.

At EU level, AFME remained closely engaged with ESMA's work on transaction reporting simplification, advocating for the same principles it advanced in the UK. Following ESMA's Final Report in July 2026, which set out medium- and long-term recommendations for regulatory change, AFME has continued to work with policymakers, also in the context of the MISP, to ensure that the next phase of reform delivers genuine reductions in complexity and cost while preserving the quality of supervisory data.

On wholesale conduct of business rules:

- following political agreement on the EU Retail Investment Strategy in December 2025 and technical trilogues in June 2026, the publication of the Level 1 text in the OJEU is currently expected by January 2027, with Member State Level 1 transposition deadline by January 2029. AFME will focus on forthcoming Level 2 measures, which will be consulted on during 2027 for a July 2029 entry into force.
- The EU Listing Act rules on MiFID investment research were due to be transposed by Member States by 5 June 2026. However, delays in national transposition have created interpretative questions around if and how the new payment option can be implemented in practice across the EU. AFME is currently discussing these issues with members. In the UK, we have continued to actively advocate, jointly with The IA and AIMA, for increased payment optionality for corporate access payments.

"AFME has continued to work with policymakers to ensure that the next phase of reform delivers genuine reductions in complexity and cost while preserving the quality of supervisory data"

MiFIR implementation

Timeline of key moments

June 26
UK: Bond consolidated tape go-live

EU: Deadline for Member States transposition of new EU Listing Act - MiFID Level 1 and 2 investment research provisions.

July 26
EU: ESMA Final Report on transaction reporting simplification

August 26
UK: FCA Policy Statements on equity market structure and transaction reporting reforms

EU: new RTS on RCB applies (for firms authorised before 23 Nov 2025)

September 26
EU: Equities consolidated tape go-live

December 26
EU: Council and Parliament negotiating mandates on MISP

January 2027
EU: Retail Investment Package to be published on the OJEU.

Delivering progress on bond consolidated tapes

Timeline of key moments

1 December 2025
UK bond transparency regime enters into force.

March 2026
AFME is appointed to the ETS Connect UK Bond Consolidated Tape Consultative Committee.

2 March 2026
EU bond transparency regime enters into force.

22 June 2026
UK Bond Consolidated Tape launches.

2026
AFME is appointed to the fairCT EU Bond Consolidated Tape Consultative Committee ahead of the EU tape launch.

Delivering progress on bond consolidated tapes

The development of bond consolidated tapes in both the UK and EU has been a major milestone in the evolution of fixed income market transparency. Over the past year, AFME has continued to play an active role in shaping these initiatives, drawing on member expertise to support bond tapes that improve access to reliable post-trade data while preserving the ability of market makers to provide liquidity in often complex and less liquid bond markets.

In the UK, the launch of the Bond Consolidated Tape represented an important step towards a more transparent and accessible fixed income data landscape. AFME's engagement with the FCA and industry stakeholders has focused on ensuring the tape is underpinned by high-quality data, proportionate governance and a framework that supports public policy objectives without creating unnecessary cost or operational complexity. AFME's appointment to the ETS Connect UK Consultative Committee further strengthens our ability to represent member views as the tape develops and is embedded in the market.

In parallel, AFME supports the development of the EU Bond Consolidated Tape, including through engagement on the design and implementation of the future fairCT tape. This work builds on AFME's long-standing advocacy for an effective EU transparency framework and recognises that the value of a consolidated tape will ultimately depend on the quality, consistency and usability of the underlying data. AFME's appointment to the fairCT EU Bond Consolidated Tape Consultative Committee provides a further channel to help ensure the tape delivers practical benefits for market participants, regulators and end investors.

Across both jurisdictions, AFME's priority remains clear: consolidated tapes should enhance transparency, support efficient and competitive bond markets, and provide a reliable evidence base for future policy decisions. This will remain an important area of focus as the UK tape matures, the EU tape moves towards launch, and market participants begin to assess how consolidated data can improve understanding of trading behaviour, liquidity and execution outcomes.

T+1 implementation and readiness

In the past 12 months, industry preparations for the European transition to T+1 settlement have accelerated. AFME is helping members navigate the transition, and continues to be a leading voice in the EU and UK industry steering committees. Through these committees, additional documentation has been published, to which AFME has contributed extensively. In addition to the pan-European high-level testing plan, the EU T+1 Industry Committee (EUT1-IC) has also finalised an 'Industry Handbook', and an accompanying Checklist, designed to assist market participants in managing their implementation projects. Additionally, the Committee has published detailed market practice guidelines regarding usage of the proposed Gating Event, which will allow for net settlement of T+0 securities financing transactions.

Generally, the industry has increased its focus on testing and preparations for the forthcoming regulatory changes and transition weekend itself, with the UK beginning to operationalise a "Command Centre" and define industry-standard performance metrics. The EUT1-IC is also establishing two groups focusing on testing, and on managing transition risks. AFME has created an informal network of programme managers, to facilitate coordination and knowledge-sharing across member firms.

Another key area of focus is on building market awareness for T+1 throughout the region, and beyond. To achieve, this AFME has supported events in London, Paris, Prague, and Athens, with a further series planned for the Autumn. AFME has also hosted a member roundtable with the FCA, and a webinar on improving settlement efficiency more generally.

"Preparations for the European transition to T+1 settlement have accelerated. AFME is helping members navigate the transition, and continues to be a leading voice in the EU and UK industry steering committees."

T+1 implementation and readiness

Timeline of key moments

Spring 2026
EU T+1 Industry Committee publishes market practice guidelines on the proposed Gating Event to support net settlement of T+0 securities financing transactions.

Spring/Summer 2026
Industry focus shifts towards transition weekend planning, testing governance and the development of readiness metrics, with the UK beginning to operationalise a Command Centre.

January 2027
Türkiye expected to move to T+1 settlement, providing another reference point for global shorter settlement cycle initiatives.

February 2027
First industry-level testing window, the fifth and final testing window is scheduled for August-September

11 October 2027
Transition date for the coordinated EU, UK and Swiss transition to T+1 settlement.

T+1 implementation and readiness

Timeline of key moments

February 2025
UK Accelerated Settlement Taskforce publishes its implementation plan for the UK transition to T+1 settlement.

June 2025
The EU T+1 Industry Committee publishes its High-level Roadmap to T+1 Securities Settlement in the EU

Late 2025
EU and UK T+1 industry steering committees continue work on implementation planning.

Early 2026
EU T+1 Industry Committee publishes the Industry Handbook to support firms' internal implementation projects.

March 2026
Pan-European high-level testing plan published, setting out the framework for industry testing ahead of the October 2027 transition.

AFME has also engaged with European CSDs on behalf of members, to centrally monitor their readiness and implementation of the industry recommendations, including those on Corporate Events and buyer protection.

Finally, AFME continues to monitor global initiatives towards shorter settlement cycles. Recent developments include the launches of consultations in Hong Kong and Saudi Arabia. Turkiye has also announced plans to move to T+1 in January 2027.

AFME remains supportive of the move to T+1, as a means to reduce settlement risk in European markets and deliver associated savings through reduced margin requirements. T+1 can also be seen as a catalyst for further investment in automation and standardisation of post-trade processes.

"AFME has engaged with European CSDs on behalf of members, to centrally monitor their readiness and implementation of the industry recommendations"

Commodities

Over the past year, AFME's commodities work followed a consistent approach: identifying interventionist or disproportionate regulatory proposals at an early stage and reshaping them, through technical and evidence-based advocacy, into proportionate and workable outcomes for members across the European Union and the United Kingdom.

The clearest example came in EU energy markets. As concern over high energy costs revived calls for direct intervention, including public remarks by European Commission President Ursula von der Leyen on potential gas price caps, AFME coordinated cross-industry advocacy warning that such measures would compromise energy security, disrupt the functioning of energy markets and create risks to financial stability. This engagement fed directly into the work of the Gas Market Task Force (GMTF), whose June 2026 report concluded that EU gas and gas derivatives markets are functioning well and avoided the most damaging proposals, including a gas price cap and an obligation to trade on EU venues. The more interventionist recommendations of the 2024 Draghi report on European competitiveness were effectively set aside.

In parallel, AFME shaped the Commission's report under Article 90(5) of the Markets in Financial Instruments Directive (MiFID II), which assessed the markets for commodity derivatives and emission allowances. Following sustained engagement with Commission officials and individual Member States ahead of publication, the report concluded there was no urgent need to make substantive changes to reporting, position limits, position management controls or position reporting, providing valuable regulatory stability for members.

Commodities

Timeline of key moments

18 August 2025
European Commission public consultation on the draft revised REMIT Implementing Regulation and new Delegated Regulation.

18 December 2025
ICE Futures Europe consults on proposed changes to Section P (position reporting, management, accountability and limits), its draft PS25/1 framework (Circular 25/159).

28 January 2026
AFME's Adam Farkas meets European Commission Commission EVP Teresa Ribera to discuss the role of energy markets and EU competitiveness.

27 February 2026
LME consults on introducing regulatory position limits, exemptions and position management controls, its draft framework (Notice 26/058).

"AFME's commodities work followed a consistent approach: identifying interventionist or disproportionate regulatory proposals at an early stage and reshaping them, through technical and evidence-based advocacy"

Commodities

Timeline of key moments

16 April 2026
ACER opens its first-round consultation on the new Guideline on REMIT transaction reporting (closes 12 June 2026).

29 April 2026
REMIT Implementing Regulation (EU) 2026/256 and Delegated Regulation (EU) 2026/255 enter into force.

26 May 2026
European Commission publishes its Article 90(5) MiFID II report on commodity derivatives and emission allowance markets, finding no urgent need for substantive change.

2 June 2026
Gas Market Task Force publishes its report on EU gas and gas derivatives markets, without a gas price cap or an obligation to trade on EU venues.

6 July 2026
UK reforms to the commodity derivatives regime (PS25/1) enter into force.

17 July 2026
European Commission publishes its EU ETS review proposal for the post-2030 period.

On the revised Regulation on wholesale Energy Market Integrity and Transparency (REMIT II), sustained engagement with the Agency for the Cooperation of Energy Regulators (ACER) secured a proportionate approach to transaction reporting, confirming that each party is responsible only for the part of the process it controls rather than for failures elsewhere in the reporting chain.

In the UK, AFME supported members through the reform of the commodity derivatives regime (Policy Statement PS25/1), which entered into force on 1 July 2026. AFME's technical input to ICE Futures Europe and to the Financial Conduct Authority (FCA) was particularly well received, and earlier interventions contributed to the London Metal Exchange's decision not to introduce block-like rules for over-the-counter (OTC) lookalike trades.

On carbon markets, AFME defended the role of banks as financiers, hedging providers and liquidity intermediaries under the EU Emissions Trading System (EU ETS) as the scheme came under pressure over costs and competitiveness, and is now engaging closely on the Commission's EU ETS review proposal published in July 2026.

"Sustained engagement with the Agency for the Cooperation of Energy Regulators (ACER) secured a proportionate approach to transaction reporting"

Divisional updates

Equities Trading

April Day
Managing Director, Head of Capital Markets

Peter Tomlinson
Managing Director, Equities Trading and Post Trade

Elena Semina
Associate Director, Equities Trading

- Ongoing advocacy to promote regulatory stability, and market structure rules that support competition, innovation and choice.
- Refreshed educational campaign to highlight the vital role of banks as bilateral liquidity providers.
- Supported the successful launch of the EU Consolidated Tape, and advancement of the UK’s version.

European equity markets have enjoyed continued positive momentum in 2026, with record-breaking trading volumes in the first half of the year. However, market structure topics remain sharply in focus, as UK and EU policymakers consider further regulatory changes. AFME has been a leading voice in this debate, calling for authorities to continue prioritising investor choice and healthy competition between trading mechanisms.

This has been particularly relevant in the EU, as negotiations progress on the Market Integration and Supervision Package ("MISP"). In the first half of 2026, AFME has delivered a comprehensive advocacy strategy – engaging frequently with EU and national officials, and partnering with other industry associations to issue several joint communications. AFME also submitted a detailed response to the ESMA Call for Evidence on the evolution of equity market structure. In the UK, AFME has provided input on recent FCA discussion and consultation papers. Throughout, AFME's work has focused on setting out a balanced, well-evidenced case for minimising regulatory intervention into current market structure rules and demonstrating that the existing framework is well-functioning, supports healthy price formation and delivers improved outcomes for investors.

This has been supported by a series of initiatives designed to improve policymakers', and the broader public's, understanding of equity markets and the important role played by banks as liquidity providers. This has included a social media "mythbusting" campaign, as well as other public speaking and media engagements.

A positive development has been the launch of the EU consolidated tape for shares and ETFs, in September 2026. Having helped shape the design of the tape, AFME has facilitated regular engagement between members and the appointed provider. We continue to advocate for further enhancements to the tape to increase its utility for market participants. In the UK, we are encouraged that the FCA intends to deliver a UK equities tape by early 2028, including pre-trade data, following extensive advocacy from AFME and other associations.

On market data more broadly, AFME has monitored developments as data providers adapt fee schedules to comply with the new 'reasonable commercial basis' rules. AFME continues to scrutinise these fee schedules and engage with data providers where necessary.

Looking to the future of equity markets, AFME continues to monitor the trend towards extended trading hours and providing updates to members on global developments. AFME has also participated in an industry working group on 24-hour trading and contributed to GFMA's response to an IOSCO consultation on this topic.

Finally, the 9th Annual Equities Dinner, held in March 2026, marked another successful year in bringing together the industry's leading figures.

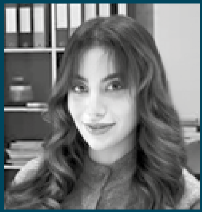
"At a critical inflection point in European equity market policy, AFME remains the leading advocate for protecting a diverse and competitive ecosystem."

Equity Capital Markets

April Day
Managing Director, Head of Capital Markets

Gary Simmons
Managing Director, High Yield and Equity Capital Markets

Oscar Newman
Manager, ECM & High Yield



Ainaz Maghsoudi
Associate, ECM & High Yield

- Advocated for proportionate UK and European primary market reforms, helping support a more flexible and competitive ECM environment.
- Engaged closely on EU Listing Act implementation and related Prospectus Regulation, Market Abuse Regulation and MiFID changes, including level 2 prospectus reforms and the new EU IPO prospectus, to support more effective capital raising across Europe.
- Responded to wider regulatory initiatives affecting equity capital markets, including the EU's Retail Investment Strategy, EU PRIIPs, the UK Consumer Composite Investments regime, MiFID costs and charges, EU private equity exits (and potential trading platform) and UK PISCES.
- Continued to promote good market practice through standard forms, guidelines and jurisdictional forums.

AFME works to enhance the competitiveness of UK and European primary equity markets by advocating for proportionate and effective regulation, which is necessary to preserve flexibility for issuers, their corporate advisers and underwriters whilst ensuring fairness for shareholders and investors. AFME also produces a number of standard forms and guidelines to promote efficient and coordinated equity-raising transactions in the UK and Europe and to develop good market practice.

AFME staff work with teams of experts from member firms on projects ranging from informal discussion groups to formal responses to regulator and government consultations. Europe and the UK have been particularly active this year in implementing their primary equity market and other reforms and we have been very engaged with regulators on such initiatives.

In the EU, we continue our work on various regulatory initiatives pertaining to the level 2 changes relating to the EU Listing Act, which includes matters such as the EU listing rules, the Prospectus Regulation, MAR and MiFID. The legislative changes have generally made listing more accessible, but there are some areas which remain unnecessarily rigid – we continue to engage with stakeholders on those areas in pursuit of a more effective and effective capital raising environment across Europe, including organising market responses in relation to the use of the short form Annex IX document.

"We remain deeply engaged with EU and UK regulators to make capital raising more efficient and effective."

AFME has been active in the implementation of the Public Offers and Admission to Trading Regime (POATR) which has replaced the UK Prospectus Regulation, and the Primary Market Effectiveness reviews which consolidated the previous premium and standard segments into a single category for equity shares in commercial companies, jointly with UK Finance. We advocated for a flexible disclosure-based regime which has been implemented by the FCA and was welcomed by the market. AFME also responded to the potential rule changes to information flows for UK equity IPOs, which considers the effectiveness of the COBS 11A / COBS 12 rule changes.

Further, AFME responds, where necessary, to more retail focussed initiatives such as the EU Retail Investment Strategy, Product Governance rules, EU PRIIPs, UK Consumer Composite Initiative regime, MiFID costs and charges and the EC Targeted consultation on private equity exits and UK PISCES.

AFME convenes jurisdictional forums to regularly analyse and discuss particular issues in key markets. These include the Frankfurt Forum, Paris Forum, and Middle East working group.

Fixed Income

April Day
Managing Director, Head of Capital Markets

Victoria Webster
Managing Director, Fixed Income

Rupert Warmington
Senior Fixed Income Advisor

Nikray Izadi
Senior Associate, Fixed Income

- Supported members through the implementation of the revised UK and EU bond transparency regimes, which entered into force in December 2025 and March 2026 respectively.

- Led sustained engagement with ESMA, DG FISMA and National Competent Authorities on the use of sovereign bond supplementary deferrals, highlighting liquidity considerations, operational challenges and the risks of divergent national approaches.

- Advanced AFME's broader data quality agenda, including advocacy on third-country APA exemptions to address data duplication arising from overlapping and dual reporting obligations and industry best practice guidance on the use of TPAC and PORT flags to support more consistent and meaningful post-trade reporting.

2025/6 has been another busy year for AFME, with activity spanning a broad range of market structure, regulatory and industry initiatives. As the MiFID transparency agenda has matured, our focus has increasingly shifted from responding to consultations and policy development towards supporting implementation, addressing unintended consequences, and leading industry engagement through working groups, the Primary Dealer and Credit Boards

Bond transparency remains a cornerstone of our work and continues to be a highly multifaceted area of focus. AFME's particularly successful 20th Anniversary Government Bond Conference helped spotlight concerns over the treatment of certain sovereign bonds under the revised EU transparency framework, which fails to consider unique liquidity characteristics of sovereign debt markets. In response to outreach by Debt Management Offices through AFME's Primary Dealer Board, we led sustained engagement with ESMA and DG FISMA on the application of supplementary deferrals for sovereign bonds.

As market participants awaited confirmation of approaches to be adopted by National Competent Authorities, AFME coordinated member input on a proposed framework, calibrated to recognise these unique characteristics and designed to promote harmonisation across Member States. We highlighted the operational challenges of staggered implementation and the risks of divergent national approaches. While ESMA ultimately chose not to adopt the AFME proposal, our advocacy ensured industry concerns were clearly represented throughout the process.

With the revised UK and EU bond transparency regimes now in force, from 1 December 2025 and 2 March 2026 respectively, attention has shifted to assessing their impact in practice. AFME is soon to access consolidated and historical post-trade data, this will enable detailed analysis of trading behaviour and the effects of the new regimes on liquidity, transparency and execution outcomes.

Alongside this work we have examined concerns surrounding the treatment of Category 2 bonds under the UK transparency regime, including issues relating to instrument classification and differing publication deferrals across trading venues. This work remains ongoing as part of the FCA post-implementation review.

June marked the launch of the UK Bond Consolidated Tape, another milestone for transparency. AFME was appointed to the ETS Connect UK Consultative Committee, which ensures that the tape delivers its intended public policy objectives. We look ahead to the launch of the fairCT EU Bond Consolidated Tape and have also been appointed to its Consultative Committee.

As part of our broader focus on data quality, AFME is advocating for third country exemptions to also include the APA framework, reducing unnecessary dual reporting and supporting higher-quality transparency data. Additionally, AFME developed industry best practice guidance on using TPAC and PORT flags, supporting more consistent post-trade reporting and ensuring transparency data remains meaningful.

The long-term success of the consolidated tapes depends on high quality, reliable data. AFME will continue to monitor data quality closely and work constructively with market participants, tape providers and regulators to ensure that these important initiatives deliver effective transparency and support well-functioning bond markets.

Beyond transparency work, AFME continued to support wider market developments through its Primary Dealer and Credit Boards, including coordinating the industry's response to HM Treasury's UK Treasury Bill consultation and advancing the Credit Axes project, which has become a key focus for members following the cessation of the trading fees initiative.

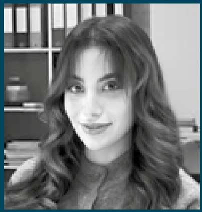
"Bond transparency remains a cornerstone of AFME's Fixed Income work, with continued focus on ensuring that revised regimes support transparency while reflecting the realities of liquidity provision in bond markets."

High Yield

April Day
Managing Director, Head of Capital Markets

Gary Simmons
Managing Director, High Yield and Equity Capital Markets

Oscar Newman
Manager, ECM & High Yield



Ainaz Maghsoudi
Associate, ECM & High Yield

- Advanced legal, regulatory and market practice work affecting the European high yield market, including private tap offerings, use of artificial intelligence in HY transactions and US Securities and Exchange Commission related matters.
- Updated key market documentation, including a standard form confidentiality agreement now jointly published with ICMA,
- Facilitated regular dialogue between high yield members and audit firms to address accounting and auditing issues outside time-sensitive transaction processes.
- Supported market development through jurisdictional seminars and the annual High Yield and Private Credit Conference in London, increasing visibility and understanding of high yield bonds across Europe.

AFME endeavours to streamline and to lower the costs of executing high yield debt capital markets transactions. AFME continues to work on legal, regulatory and market practice related issues directly (or indirectly) impacting the European high yield market. This includes issues relating to private tap offerings, MiFID Issuer Obligations, use of AI, and SEC related matters, as well as the HY market disclosure, diligence and other transactional issues that are always present for our members.

AFME staff work with teams of experts from member firms on projects ranging from informal discussion groups and educational webinars to producing standard form documents and market practice guidelines.

AFME released an updated version of its confidentiality agreement (NDA) now jointly published with ICMA, and the team are currently working on producing standard forms for a data room NDA / disclaimer and an Auditor Due Diligence Questionnaire. These are intended to increase clarity and efficiency in transactions and are currently (or will be) in use by leading law firms and banks.

AFME has also facilitated regular bi-lateral discussions between AFME HY members and audit firms to consider accounting / auditing issues on which parties might disagree or might find unusual or unhelpful on transactions. This has been reported to be particularly useful as market participants are able to discuss issues outside of a time sensitive deal environment.

AFME produced jurisdictional seminars to work to help increase the visibility, and viability, of high yield bonds in some of the jurisdictions where the high yield bond market is not as developed as in other European jurisdictions, and an annual High Yield and Private Credit Conference in London to provide a comprehensive update of the market and networking opportunities.

"Facilitating open dialogue between members and audit firms has proven invaluable in resolving complex issues outside of time-sensitive deal environments."

Post Trade

April Day
Managing Director, Head of Capital Markets

Peter Tomlinson
Managing Director, Equities Trading and Post Trade

Remi Kireche
Director, Advocacy

Pablo Garcia
Associate Director, Post Trade

Mikko Olli
Associate Director, Post Trade

- Continued advocacy for competitive, transparent and interoperable post-trade market infrastructure in Europe.
- Delivered landmark report analysing and benchmarking CSD fees.
- Led industry standardisation initiatives through publications of best practices, guidelines and template questionnaires.

From an advocacy perspective, AFME's work this year has focused on contributing to the ongoing debate on the EU Market Integration and Supervision Package ("MISP"). AFME's post trade priorities include calling for mandatory interoperability of major cash equity CCPs, supporting further regulatory changes to advance new DLT-based market models, and cautioning against any measures to restrict internalised settlement. We also continue to advocate for improved CSD fee transparency and comparability, and published a new report in the Autumn containing unprecedented data insights into global CSD fees. An updated version will be published later this year.

T+1 remains a priority area of focus for AFME and our members. We continue to participate in and provide support to the industry steering committees in the EU and UK – contributing to numerous documents published over the past 12 months. These documents, such as the pan-European testing plan and the EU T+1 Handbook, are designed to help firms prepare for implementation in October 2027. As the focus shifts from industry-wide to firm-specific preparations, AFME has established an informal network of T+1 programme managers across member firms – providing a forum to ask questions and share views on common implementation challenges. We have also developed industry-standard guidelines regarding allocation and confirmation messages, and the use of partial settlement facilities.

On shareholder rights, AFME has responded to the European Commission's review of the current legal and regulatory framework, as Europe seeks to improve shareholder engagement, voting processes, and the overall efficiency of shareholder communication and corporate actions processes. AFME's priority recommendations include conversion of the existing Directive into a Regulation, and the establishment of a common definition of 'shareholder' across member states.

2026 marks ten years since AFME began publishing our annual "Due Diligence Questionnaire" – a widely used industry standard template designed to help firms assess their network of custody providers. This year, AFME has published three versions – for sub-custodians, CSDs, and prime brokers.

OPTIC 2025 in Amsterdam brought together leading industry voices at the intersection of post-trade and technology, reflecting the renewed public and private sector ambition to better integrate, digitise and modernise the post-trade ecosystem to support the competitiveness of European securities markets. AFME has also participated in other industry events in Frankfurt, Stockholm, Paris, and Madrid – as well as holding Post Trade Board meetings in London and Milan.

"An integrated, modern and efficient post-trade ecosystem is essential to support the competitiveness of European securities markets."

Commodities

April Day
Managing Director, Head of Capital Markets

Carlo De Giacomo
Director, Commodities

Kathleen Traynor
Consultant, Commodities

- Shaped the outcome of the European Commission’s Gas Market Task Force report, helping to avoid problematic recommendations including a gas price cap and an obligation to trade on EU venues, and securing the effective rejection of the more interventionist Draghi proposals.

- Successfully influenced the Commission’s Article 90(5) MiFID II review of commodity derivatives and emission allowance markets, which concluded there is no urgent need for substantive changes to data and reporting, position limits, position management controls or position reporting.

- Advanced the UK commodity derivatives reforms (PS25/1) to a strong outcome that members welcomed, with AFME’s engagement on ICE Futures Europe’s implementation approach and on the FCA’s wider framework particularly well received.

- Maintained leadership across carbon market policy, responding to consultations on the EU ETS and Market Stability Reserve review, international carbon credits and the EU’s 2040 climate target, and engaging on the Commission’s new ETS review proposal published in July 2026.

Over the past 12 months, AFME delivered a series of advocacy outcomes across the EU, UK and global regulatory agendas, supporting the efficiency, integrity and competitiveness of commodities markets through sustained, technically focused engagement.

A major focus was the EU energy and commodity derivatives agenda. Following the conclusion of the European Commission's consultation on commodity derivatives markets, AFME undertook targeted outreach with policymakers, Member States and the newly established Gas Market Task Force (GMTF). When gas price interventions returned to the agenda, including remarks by Commission President von der Leyen ahead of the March European Council, AFME coordinated industry advocacy warning that capping gas prices could compromise Europe's energy security, disrupt the functioning of its energy markets and carry significant risks to financial stability. This engagement shaped the final GMTF report, which avoided problematic recommendations such as a gas price cap and an obligation to trade on EU venues, effectively rejecting the more interventionist proposals of the Draghi report.

In parallel, AFME successfully influenced the Commission's report under Article 90(5) of MiFID II, assessing the markets for commodity derivatives, emission allowances and derivatives of emission allowances. Through extensive engagement with Commission officials, Cabinets and individual Member State representatives ahead of publication, AFME helped ensure the review concluded there was no urgent need to make substantive changes to data and reporting, position limits, position management controls or position reporting. The outcome provides important regulatory stability for members operating across European commodity markets.

On REMIT II, AFME supported members throughout the transition to the revised framework, including detailed analysis of the new implementing rules and engagement on enforcement and reporting practices. Sustained dialogue with ACER's Market Data teams secured a proportionate approach to transaction reporting, with the updated draft guidance clarifying that each reporting party should be responsible only for the part of the reporting process it controls.

Carbon markets remained a priority throughout the year. AFME responded to the Commission's EU ETS and Market Stability Reserve review, and welcomed the opening of formal EU-UK negotiations on linking their respective Emissions Trading Schemes, a long-standing AFME objective. AFME also submitted its response to the Commission's consultation on the potential use of international carbon credits towards the EU's 2040 climate target, and co-signed a joint statement calling for a permanent legal basis for the Domestic Reverse Charge Mechanism to protect against VAT fraud in energy and environmental markets. With the Commission's ETS review proposal published in July 2026, AFME is now engaging closely on the file.

In the UK, AFME delivered a strong outcome on the reform of the commodity derivatives regulatory framework (PS25/1), which members welcomed. AFME's targeted feedback to ICE Futures Europe on its implementation approach, supported by dedicated member sessions, was particularly well received, and AFME continued to press the FCA to accelerate its approval process so that firms had time to plan for compliance. AFME also responded to the LME's consultation on regulatory position limits, exemptions and position management controls, with the final framework reflecting several of its points. Earlier interventions on the LME's OTC booking fee and transparency proposals, escalated to the FCA and HM Treasury, contributed to the exchange's decision not to introduce block-like rules for OTC lookalike trades.

AFME also engaged closely with national authorities on market abuse, raising concerns at a roundtable hosted by the Dutch Authority for the Financial Markets that its expansive interpretation of self-matching transactions under MAR risks capturing legitimate trading activity and creating unnecessary legal uncertainty. At the global level, AFME, jointly with CMCE, FIA and ISDA, submitted its response to IOSCO's consultation on good practices for over-the-counter commodity derivatives markets, drawing on its close involvement with the FCA's reform agenda.

Through this combination of regulatory engagement, technical input and proactive guidance, AFME continues to support its members and help shape the evolving regulatory landscape for commodity markets across the EU, UK and beyond.

Securitisation

April Day
Managing Director, Head of Capital Markets

Shaun Baddeley
Managing Director, Securitisation

Maria Pefkidou
Director, Securitisation

Remi Kireche
Director, Advocacy

- AFME's recommendation for a holistic approach to securitisation reforms has been clearly reflected in the Commission's legislative proposal and our extensive advocacy brought additional issues into the trilogue negotiations.

- Through detailed legal drafting, evidence-based impact analysis and a sustained programme of targeted public engagement — including numerous advocacy meetings with Member States and the European Parliament, alongside a dedicated LinkedIn campaign — AFME helped shape the policy debate and demonstrate the value of securitisation to the real economy.

- AFME played a leading role in driving the UK's move towards a more principles-based securitisation regime, while giving issuers and investors a direct voice on outstanding prudential priorities via a PRA roundtable in May.

- Global ABS reached a record-breaking attendance of 5,650 delegates, an 8.3% increase from 2025.

Over the past year, AFME has played a leading role in shaping securitisation policy across the European Union and the United Kingdom, ensuring that members' priorities remained central to the reform agenda.

AFME's advocacy has helped secure significant progress in the European Commission's legislative proposal. The Commission's legislative package reflects the holistic approach set out in AFME's 5-point plan – published a year before the legislative proposal – and incorporates many long-standing AFME positions. Across the Commission, Council and Parliament, there is now broad recognition that the current conduct and prudential rules are burdensome, with all three institutions supporting more proportionate and risk-sensitive approaches.

AFME also succeeded in bringing important issues into the trilogue negotiations that were not included in the Commission's original proposal. These include reform of the UCITS framework, where AFME has advocated increasing the 10% single-body acquisition limit where it applies to securitisations, and a more proportionate Credit Conversion Factor (CCF) for committed undrawn facilities supporting ABCP transactions and warehouse lines.

Its advocacy also contributed to a more favourable prudential framework for insurers. The revised Solvency II Delegated Act, applying from January 2027, introduces lower risk factors for securitisation investments, including improved treatment for senior and non-senior non-STS tranches and full alignment of senior STS tranches with the prudential treatment of covered bonds.

Throughout the Council and European Parliament negotiations, AFME ensured that members' priorities were supported by detailed legal drafting, extensive engagement with Member States and Members of Parliament, impact analysis and joint industry initiatives (e.g. joint statement, open letter, press release and industry letters on SECR & CRR).

AFME also strengthened understanding of securitisation's wider economic value. Our LinkedIn campaign on Significant Risk Transfer, Asset-Backed Commercial Paper and Green Securitisation demonstrated how securitisation can increase banks' lending capacity for small and medium-sized businesses, support working-capital financing and contribute to Europe's energy transition.

In the UK, AFME coordinated a wide industry response to the Financial Conduct Authority (FCA) and the Prudential Regulation Authority (PRA) consultations (CP26/6, CP2/26) on due diligence, transparency and other securitisation requirements. Our joint response welcomed the proposed principles-based regime, while a dedicated PRA roundtable hosted by AFME for members and non-members, gave issuers and investors a direct opportunity to draw the PRA's attention to important outstanding prudential matters.

We also established an Anti-Fraud Working Group to strengthen industry practices for identifying, assessing and managing fraud risk, with industry guidelines now under development.

Finally, AFME continued to provide members with leading industry forums. Together with FT Live and DealCatalyst, we delivered several major conferences, with Global ABS attracting a record 5,650 delegates—an 8.3% increase from 2025.

"AFME's advocacy has helped secure significant progress in the European Commission's legislative proposal, which reflects the holistic approach set out in AFME's 5-point plan and several of the industry's key priorities."

Secondary Capital Markets and Wholesale Investor Protection

April Day
Managing Director, Head of Capital Markets

Giulia Pecce
Director, Head of Secondary Capital Markets and Wholesale Investor Protection Policy

Anastasios Charalampous
Manager, Secondary Capital Markets & Wholesale Investor Protection

- AFME played a leading role in shaping the debate on transaction reporting simplification across both the EU and UK, building industry consensus to help design a more proportionate, less frictional regime.

- With a focus on the wholesale aspects of the file, we have continued to monitor developments on the EU Retail Investment Strategy Package negotiations, highlighting opportunities for greater simplification in key areas such as value for money, inducements, suitability and appropriateness, client categorisation and PRIIPS.

- The EU Listing Act's MiFID investment research rules were due for national transposition by 5 June 2026, but Member State delays raise implementation questions across the EU. In the UK, AFME continues to work with the IA and AIMA to advocate for greater payment optionality for corporate access payments.

- Now in its third and final edition, the AFME/Linklaters MiFID Implementation Guide (December 2025) has continued to serve as an important industry resource, helping firms navigate implementation and interpretation challenges across key areas of MiFID.

Over the past year, AFME has continued to support members in navigating significant MiFID regulatory changes across EU and UK wholesale capital markets. A key milestone, in December 2025, was the publication of the third and final edition of the AFME/Linklaters MiFID Implementation Guide. The Guide remains an important industry resource, helping firms address implementation and interpretation challenges across key MiFID areas. To mark its release, AFME and Linklaters hosted a panel event bringing together sell-side and buy-side market participants, alongside public officials from the FCA, ESMA and AMF, to discuss ongoing implementation priorities and market impacts.

Simplification of transaction reporting remained a major priority throughout the year.

In September 2025, AFME submitted a joint trade association response to the European Securities and Markets Authority's Call for Evidence, followed by sustained engagement with national and European authorities and policymakers. AFME advocated for reforms that would remove duplication, introduce single-sided reporting and subject reportable fields to a critical review. Following the publication of ESMA's Final Report in July 2026, AFME continues to engage with policymakers to help ensure that revisions to the EU transaction reporting framework deliver tangible simplification for firms while strengthening supervisory outcomes.

In parallel, AFME engaged extensively with the FCA on the UK transaction reporting review and responded in February 2026 to the FCA consultation, which included proposals to streamline the UK MiFID transaction reporting regime. The FCA policy statement, issued in August 2026, broadly confirmed the proposals on which it had consulted, and was welcomed by AFME as an important milestone in simplifying reporting requirements. Recognition of our expertise in this area was also reflected in AFME's Giulia Pecce's appointment to the FCA and Bank of England Transaction and Post-trade Reporting Taskforce, which will inform the long-term approach to harmonising transaction and post-trade reporting requirements.

AFME also supported market understanding of the EU and UK transaction reporting reforms through a February 2026 webinar, bringing together sell-side and buy-side perspectives.

On the EU Retail Investment Strategy (RIS) Package, AFME continued to advocate for a more proportionate and workable framework, focused on mitigating some of the most challenging aspects of the co-legislators' proposals. During trilogue negotiations, AFME engaged extensively with EU interlocutors, emphasising the need to simplify rules in critical areas of the new regime, including value for money, inducements and client categorisation. Following the political agreement reached in December 2025 and the conclusion of technical trilogues in June 2026, AFME will shift its focus to Level 1 implementation issues and forthcoming proposals on Level 2 requirements.

The EU Listing Act rules on MiFID investment research were due to be transposed by Member States by 5 June 2026. However, delays in national transposition raise interpretative questions around if and how the new payment option can be implemented in practice across the EU. In the UK, we have continued to actively advocate, jointly with The IA and AIMA, for increased payment optionality for corporate access payments.

"This is a pivotal time to transform transaction reporting from a burdensome and costly compliance exercise into a smarter, more effective supervisory tool while significantly improving the reporting experience for firms"

Capital and Risk Management

Caroline Liesegang
Managing Director, Head of Capital & Risk Management, Sustainable Finance and Research

Constance Usherwood
Managing Director, Capital & Risk Management

Arved Kolle
Managing Director, Germany

Jeanie Watson
Director, Capital & Risk Management

Mark Bearman
Director, Capital & Risk Management

Jim Rusagara
Associate Director, Advocacy

Natasha Wright
Associate Director, Capital & Risk Management

- Supported the smooth implementation of CRR3/Basel 3.1 across the EU and UK, including targeted engagement on the Fundamental Review of the Trading Book, options and national discretions, operational risk, NSFR fixes, and related supervisory expectations.
- Advanced AFME's work on competitiveness and simplification, helping members articulate practical recommendations on capital stack design, buffer usability, Pillar 1/Pillar 2 interactions, MREL/TLAC alignment, the simplification of supervisory reporting and supervisory proportionality. This was also taken forward in the UK through coordinated input into the FPC's review of UK bank capital requirements and targeted engagement with the PRA and HMT.
- Strengthened member engagement on economic capital management, stress testing, and prudential reporting, including work on the draft methodology for the 2027 EU-wide stress test, the 2026 Geopolitical Reverse Stress Test exercise, market risk methodology, data integrity, and the impact of reporting distortions.
- Contributed to key recovery and resolution policy outcomes, including implementation of the CMDI package, enhanced engagement with the SRB alongside formal responses to consultations, and development of positions on resolution topics for advocacy.

AFME continued to provide a central forum for members on the major prudential, supervisory, recovery and resolution issues shaping European wholesale banking. The period was marked by the transition from finalising post-crisis reforms to implementing, simplifying and recalibrating them in a way that preserves resilience while supporting deeper, more competitive European capital markets.

A key focus was the implementation of CRR3/Basel 3.1 and associated UK reforms. AFME supported members in navigating the evolving EU and UK implementation landscape, including the treatment of market risk under the Fundamental Review of the Trading Book, options and national discretions, liquidity and NSFR issues, operational risk and the practical implications of supervisory expectations. Through working groups, bilateral engagement and board-level discussion, AFME helped members identify areas where targeted amendments, transitional measures or clearer supervisory guidance could reduce unnecessary complexity without undermining prudential soundness.

AFME also played an important role in the broader policy debate on competitiveness and simplification, in the EU, and capital requirements in the UK. To frame industry input into the European Commission's work on the competitiveness agenda and to support engagement with policymakers, AFME developed and socialised reports and recommendations on the capital stack, buffer usability, the Banking Union, Pillar 1 and Pillar 2 overlap, MREL/TLAC interactions, resolution, proportionality and supervisory transparency in the EU. Particular attention was given to avoiding excessive capital layering, improving the usability of buffers, ensuring coherent treatment of going-concern and gone-concern resources, and promoting a more predictable supervisory framework. In the UK, AFME worked with members to inform the review of bank capital requirements, focusing on the need for a reduction in requirements across the prudential framework and stressing the importance of reform beyond the areas identified by policymakers.

"AFME helped members move from implementation readiness to practical delivery, ensuring that Basel 3.1 reforms are applied in a way that is robust, workable and internationally coherent."

"Through sustained engagement on stress testing, reporting and resolution, AFME provided members with a strong collective voice on the operational realities of prudential regulation."

Economic capital management, stress testing and supervisory reporting remained core areas of activity. AFME continued its engagement with the EBA and ECB on stress testing, providing technical input on the draft methodologies of upcoming exercises and contributing to discussions on lessons learned from one-off supervisory stress tests. It also supported work on prudential reporting distortions and data integrity, helping members explain how reporting design can affect regulatory outcomes and supervisory interpretation.

In recovery and resolution, AFME engaged on the implementation of the CMDI package, developments in SRB and PRA guidance, and developed detailed positions on resolution issues to inform the European Commission's work on competitiveness. Alongside formal engagement through consultations, AFME developed its strategic engagement with the SRB. Taken together, these activities helped members respond to a complex policy environment with practical, evidence-based positions and reinforced AFME's role as a trusted, technically expert voice on prudential regulation and risk management.

Supervision

In 2026, AFME continued its close engagement with ECB Banking Supervision, focusing its work on the ECB's simplification agenda, "next level supervision" project, and the reform of the Supervisory Review and Evaluation Process (SREP). Working closely with members, AFME sought to ensure that commitments to increase supervisory efficiency translate into measurable burden reduction for supervised institutions, while also advancing the wider discussion on proportionate, accountable and risk-based supervision.

To support this work, AFME undertook a detailed assessment of the ECB's simplification initiatives to identify areas where banks continued to face significant burden, particularly in relation to the intensity of supervisory reviews, on-site inspections, data requests and supervisory expectations. Drawing on this analysis, AFME provided targeted recommendations to the ECB's High-Level Task Force on simplification.

A number of these priorities were subsequently reflected in supervisory developments. During the year, banks received Supervisory Examination Programmes earlier in the cycle, supporting more efficient planning and resource allocation. The ECB also progressed work on accelerated approval processes in selected areas, including own funds and securitisation cases. AFME also secured a dedicated lessons-learned exercise on the SREP reforms to assess the changes implemented and discuss further scope for improvements.

Alongside the work on simplification, AFME increasingly focused on the link between supervision and European competitiveness. AFME's contribution to the European Commission's work on banking-sector competitiveness emphasised the need for supervisory burden reduction, proportionality and accountability. We were pleased to see a number of themes reflected in the Commission's final report, particularly the recognition that competitiveness is shaped not only by regulation, but also by supervisory practice, as well as the importance of risk-based supervision. We also welcomed the ECB's review of public supervisory guidance and its commitment to re-consult on relevant changes to supervisory guides.

AFME continued to engage with the SSM on current supervisory priorities. This included discussions on the revised EBA guidelines on SREP, supervisory stress testing, Pillar 1 and Pillar 2 overlaps, simplification of supervisory reporting, Basel III implementation, CRD VI Article 21c and booking model expectations, and operational resilience and emerging technologies, including artificial intelligence.

Finally, AFME maintained regular and structured engagement with the SSM throughout the year. We were pleased to welcome Claudia Buch as a speaker at our European Financial Integration Conference and Katia Mastrodomenico at our Sustainable Finance Conference. We also held bilateral discussions with Supervisory Board members, including Patrick Montagner who participated in the third Senior SSM Forum hosted jointly with A&O Shearman. Additionally, AFME coordinated member participation in the bi-annual Industry Dialogue and D-SSR risk outlook meetings, and continued to facilitate working-level exchanges on priority supervisory topics.

"AFME continued to facilitate regular and structured dialogue between the industry and ECB Banking Supervision."

Compliance, Control & Accounting

James Kemp
Managing Director, Global FX Division

Louise Rodger
Managing Director, Compliance, Control & Accounting (CCA)

Stefano Mazzocchi
Managing Director and Deputy Head, Advocacy

Ian Sandles
Director, Tax and Accounting

Fiona Willis
Director, Compliance Control & Accounting and Technology & Operations

Carolina Cazzarolli
Manager, Advocacy

Shalini Cautick
Senior Associate, Compliance, Control & Accounting (CCA)

Ria Mehta
Associate, Compliance, Control & Accounting (CCA)

- Secured direct engagement with regulators and supervisors on members' key priorities, strengthening AFME's position as a trusted industry partner to IOSCO, ESMA, AMLA and national authorities.
- Published inaugural thought leadership report on Bank Taxes in Europe which has formed the basis of engagement with the European Commission and HM Treasury.
- Revising the UK Short Selling regime resulted in rule changes that represented significant costs savings for our members.

Compliance

The European regulatory agenda continues to shape much of AFME's Compliance work. This includes aspects of MiFID II, the EU Retail Investment Strategy and engagement with EU regulators and supervisors on IOSCO's work on pre-hedging. Meanwhile in the UK, we secured impactful changes to the FCA's revised short-selling proposals. This included a streamlined market-maker exemption process, reducing cost and improving efficiency for members and the wider market. We also continue to engage with the FCA on its plan to address challenges on the application of the Consumer Duty to certain wholesale activities. In particular, we were able to provide direct input into the FCA's supervisory statement on co-manufacturing with respect to its scope and application, making obligations clearer for member firms.

With strong corporate governance a critical driver of positive culture and effective risk management, AFME has continued to champion a principles-based and risk-based approach. We have had productive dialogue with the EBA on planned updates to their Guidelines on Internal Governance and Suitability Assessment, emphasising the need for recognition of the diversity of corporate law structures across the EU. In the UK, Phase 1 changes to the Senior Managers and Certification Regime (SMCR) included key AFME asks such as improvements to the 12-week rule, a more streamlined SMF assessment process and retained flexibility on regulatory references.

As the new European Anti-Money Laundering Authority builds out its expertise and guidance, we have established a constructive relationship, prioritising our message of the need for practical, proportionate, risk-based rules, along with timely guidance to ensure public-private alignment ahead of the new EU AML regime.

Our 9th Annual European Compliance and Legal conference was held in London in September 2025, with keynotes from ESMA, the European Commission, AMLA and the FCA. Key themes of the two-day event included the impact of geopolitics, technological change and regulatory evolution on the Legal and Compliance Functions.

Tax & Accounting

AFME has continued to engage with tax authorities and stakeholders on capital markets related tax issues at EU and national level. In February 2026 we published a thought leadership report on Bank Taxes in Europe which has formed the basis of engagement with the European Commission and HM Treasury.

We responded to the Commission's calls for evidence on the Directives on corporate tax and administrative cooperation and welcomed their ambitious omnibus on taxation. We have continued to work with the Commission and members on the implementation of the FASTER Directive.

Our financial transaction tax protocols have continued to enjoy a high take-up rate from market participants, providing a strong network effect and minimising the need for inefficient bilateral arrangements.

In the UK, we welcomed the introduction in the November 2025 Budget of a temporary stamp duty exemption for new listings and changes to the rules for VAT groups. In Italy we welcomed the withdrawal of proposed changes to Italian withholding tax rules following representations. In our wider tax work, we made representations to tax authorities in Spain, Ireland, the Netherlands and Nigeria on issues raised by members.

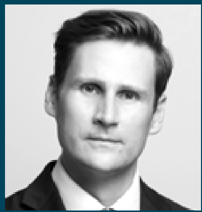
The Accounting Forum responded to consultations on changes to accounting standards and engaged with the International Accounting Standards Board on current accounting issues. The Independent Valuation Controls forum made representations to the EBA and ECB regarding proposed amendments to the Regulatory Technical Standards (RTS) on Prudent Valuation and completed a member survey on current valuation issues.

Technology & Operations

James Kemp
Managing Director, Global FX Division

Stefano Mazzocchi
Managing Director and Deputy Head, Advocacy

Coen ter Wal
Managing Director, Technology & Operations



Marcus Corry
Director, Technology & Operations

Fiona Willis
Director, CCA and Technology & Operations

Coco Chen
Associate Director, Technology & Operations

- Delivered significant streamlining of new UK Operational Resilience incident reporting requirements, in particular achieving avoidance of separate reporting regimes for payment-related and other incidents.
- Accomplished the inclusion of proposals for Settlement Schemes in the European Commission's proposals for a revised EU DLT Pilot Regime, which enable the creation of settlement schemes without the need for Central Securities Depositories.
- Reduced the scope of the EU's horizontal Cyber Resilience Act as it applies to products within Financial Services, reducing the duplication of risk management compliance for AFME members.
- Achieved postponement of EU AI Act's requirements for high-risk application of AI, in particular AI systems deployed in creditworthiness assessments.

In the area of Technology and Operations, AFME focuses on helping members achieve operational efficiencies and revenue opportunities by working to enable the adoption of new technologies and streamlining of operational processes.

In the last year, this has been operationalised through three key focus areas: 1. Enabling members to implement key new technologies at scale; 2. Ensuring new regulatory requirements in the area of operational resilience are reasonable and implementable; 3. Helping to steer discussions around digital sovereignty in the EU to more constructive and realistic frames.

First, AFME has focused on enabling members' at-scale implementation of transformative new technologies such (Generative and Agentic) Artificial Intelligence – (Gen)AI – and Distributed Ledger Technology (DLT) at scale: In the area of AI, AFME achieved a postponement of requirements for high-risk AI applications – which include use of AI in creditworthiness assessments and HR processes - and engaged extensively with policymakers to clarify the scope and requirements of the EU AI Act to ensure banks operating in the EU can deploy AI. AFME also worked with members to establish good practices for information provision to banks by third parties (vendors) embedding AI in their services and products.

In the area of DLT, AFME has continued its leading work on the scaling of DLT-based capital markets. AFME achieved the incorporation of proposals for 'distributed finance': DLT settlement systems based on a network logic that remove the need for CSDs, enhancing efficiency, competition and resilience in settlement. AFME also published a vision and policy proposals to accomplish a DLT-based capital markets architecture, which it will convey in the upcoming ECB Appia initiative.

A second key focus has been in working on reasonable and streamlined regulatory cyber and operational resilience requirements. AFME worked with UK regulators to streamline proposals for new incident reporting frameworks, achieving the removal of a separate reporting regime for payment incidents. In the EU, AFME engaged significantly with policymakers in the context of the EU's Digital Omnibus package to minimise overlap between financial services operational resilience regulation (DORA) and new cross-sectoral cyber regulations, achieving significant reduction in the scope and impact of the EU Cyber Resilience Act. In the EU, AFME engaged significantly with policymakers in the context of the EU's Digital Omnibus package to minimise overlap between financial services operational resilience regulation (DORA) and new cross-sectoral cyber regulations, achieving significant reduction in the scope and impact of the EU Cyber Resilience Act.

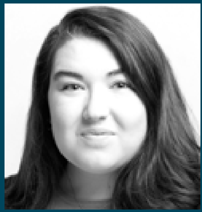
The past year has also seen a significant focus on EU digital and technological sovereignty, in particular in the areas of cloud and AI. AFME, highlighting the global nature of capital markets and the long-term investment decisions that underpin cloud adoption decisions, has engaged significantly with EU policymakers to ensure policymakers take constructive and realistic approaches in enhancing European offerings of cloud and AI services.

"As technology and cyber regulations become increasingly cross-sectoral, AFME has successfully worked to minimise the overlap of forthcoming EU cross-sectoral cyber resilience requirements with the existing financial services operational resilience framework."

Sustainable Finance

Caroline Liesegang
Managing Director, Head of Capital & Risk Management, Sustainable Finance and Research

Oliver Moullin
Managing Director, Sustainable Finance, General Counsel and Company Secretary



Rachel Sumption
Associate Director, Sustainable Finance

Carolina Cazzarolli
Manager, Advocacy

- Successfully advocating for the simplification of the EU corporate sustainability framework through the Omnibus I reforms
- Shaping the development of the UK sustainable finance framework
- Supporting members to navigate the evolving EU and UK sustainable finance policy landscape
- Providing a forum for industry and policy makers to discuss the future of sustainable finance

The EU and UK sustainable finance regulatory landscape has undergone significant change over the past 12 months. AFME has closely engaged with policymakers throughout, advocating for a policy and regulatory environment that addresses the challenges identified by members and which enables banks' role in financing the investments needed to meet governments' sustainability goals. AFME has also continued to support members with practical implementation in the face of diverging policy approaches across jurisdictions.

A key focus during the period was the EU's initiative to simplify its corporate sustainability regulatory framework, balancing climate ambition with a focus on competitiveness and burden reduction. Following trilogue negotiations in late 2025, the Sustainability Omnibus Directive amending the Corporate Sustainability Reporting Directive (CSRD) and Corporate Sustainability Due Diligence Directive (CSDDD) entered into force in March 2026. AFME engaged closely throughout the trilogues process and successfully advocated for our key priorities to be reflected in the text, including significant simplifications to sustainability reporting, due diligence, and transition planning requirements. We also led industry-wide advocacy to secure interim simplification of EU Taxonomy reporting requirements ahead of the Commission's forthcoming substantive review. An important element of the package was the revision of the European Sustainability Reporting Standards (ESRS), where AFME provided substantial input to EFRAG and the European Commission and secured significant simplification for members. [See the highlights section for further details on our work on the Sustainability Omnibus and broader simplification agenda.]

Following the Commission's proposal to review the Sustainable Finance Disclosure Regulation (SFDR), AFME has engaged with co-legislators to ensure that the review provides a simpler, usable framework for sustainable investing. The proposal reflected a number of AFME priorities, including the removal of duplicative entity-level disclosures and a move towards a sustainability product labelling system.

In the UK, AFME continued to engage as the government put in place the key pillars of its sustainable finance framework. In line with our recommendations, the government endorsed the UK Sustainability Reporting Standards (UK SRS), based on the global baseline established by the International Sustainability Standards Board (ISSB). AFME also provided input to the Financial Conduct Authority (FCA) on the introduction of sustainability reporting requirements for listed companies and continued to promote efforts in support of scaling transition finance through our involvement with the Transition Finance Council where AFME was represented on the Working Group which developed the Transition Finance Guidelines.

We have kept members updated with our weekly member newsletter, and our quarterly ESG data reports continued to track the development of European ESG capital markets.

Last but not least, in May, AFME's European Sustainable Finance Conference returned to Amsterdam for its fifth year. We welcomed a number of high-level officials, representatives from financial institutions and corporates and provided a forum for members and other stakeholders to discuss the re-framing of sustainable finance as an avenue for regional competitiveness and economic growth in the current geopolitical context.

"AFME's 5th Annual European Sustainable Finance Conference brought together policy makers, industry leaders, and corporates to discuss the future of sustainable finance in an evolving world"

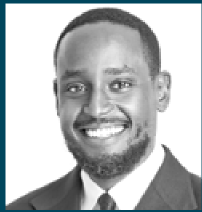
Advocacy

Jacqueline Mills
Managing Director, Head of Advocacy

Stefano Mazzocchi
Managing Director and Deputy Head, Advocacy

Arved Kolle
Managing Director, Germany

Rémi Kireche
Director, Advocacy



Jim Rusagara
Associate Director, Advocacy

Matthew Harley
Associate Director, UK Advocacy

Carolina Cazzarolli
Manager, Advocacy

Francesca Palladino
Manager, Advocacy

Jan Emig
Manager, German Advocacy

Adriana Vitvitchi
Senior Associate, Supervision

- Constructive and evidence-based engagements with policymakers across Europe succeeded in promoting ambitious reform programmes aimed at strengthening the competitiveness of banks across Europe.
- Active advocacy campaigning to highlight the need to achieve simplification in financial services regulation that can benefit users of financial services, from corporates and public authorities in need of funding and investors looking for opportunities.
- Promoted an evidence-based discussion on the role and functioning of Europe’s equity markets, highlighting the benefits of diversity in trading modalities, investor choice and competition.
- Facilitated hundreds of engagements with EU & UK authorities on behalf of members.
- Positioned AFME as key interlocutor on integration and digital finance innovation issues.
- Implemented effective outreach strategies in key countries. Under the guidance of our Paris Forum, AFME’s engagement in France has remained extremely active with all key authorities. AFME has built a productive dialogue with the Frano-German Task Force on Digital Finance. In Germany, AFME’s study with ‘zeb’ provided a helpful platform to connect with key stakeholders. In the UK, in the context of a government changeover, AFME has developed a renewed agenda for UK Financial Markets.

With competitiveness and simplification considerations driving policymakers' objectives both in the EU and the UK, AFME's advocacy activities over the past year have been focused on building awareness on the centrality of capital markets in delivering growth and in supporting innovation in Europe.

In the EU, the key pillars of our advocacy activities have been:

- **Capital markets integration**: AFME has been a key voice in the discussions on the Market Integration and Supervision Package (MISP). At a time when Europe faces significant competitiveness challenges and rising investment needs, achieving greater integration of financial markets and progressing the Savings and Investment Union is crucial. In this context, AFME has promoted an evidence-based debate aimed at ensuring competition, and choice for investors in EU equity markets.

- **Securitisation:** AFME played a leading role in shaping securitisation reforms across both the European Union and the United Kingdom, ensuring that members' priorities remained at the heart of the policymaking process. Through sustained engagement with policymakers, regulators and industry stakeholders, AFME helped build broad support for a more proportionate, risk-sensitive framework that better reflects the strong performance and economic value of securitisation.

- **Promoting competitive banking markets**: AFME has reiterated the importance of supporting the competitiveness of the European banking system by completing the Banking Union, creating a single market for banking where capital and liquidity can flow freely within EU banking groups and where overlapping and complex requirements are removed. Our contribution to this debate has been reflected, to a significant extent, in the initial policy objectives of the European Commission in its dedicated Communication and in the positions of other key stakeholders.

- **Leveraging digital finance to increase access to funding for the economy**: in a context where innovation has been reshaping financial markets, AFME has provided evidence and increased awareness of the transformational opportunities linked to the use of DLT. At the same time AFME's advocacy has provided concrete recommendations – in dossiers including simplification of DORA requirements (overlap DORA-Cyber Resilience Act), data sharing (FiDA) or Cloud infrastructures - on how to ensure that digital innovation, simplification and sovereignty considerations are reconciled in a proportionate and competitiveness-friendly way.

In the UK, where a decade of reforms has been undertaken, AFME has continued its dialogue with key policymakers and provided concrete recommendations aimed at improving the regulatory landscape and the attractiveness of doing business in the UK. In our paper "*A Renewed Agenda for UK Financial Markets*" we have outlined the priority actions to promote stronger investment, deeper capital markets and wider economic benefits across the UK. More details are provided in the UK focused section below.

Under the strategic guidance of the European Public Policy Committee (EPPC) we have designed and implemented ambitious engagement programmes, with the objective of supporting policy makers in this new policy cycle where competitiveness and simplification considerations have gained stronger emphasis. As part of this, we have complemented the advocacy work with more intensive communication campaigns, leveraging on a broad range of AFME publications, surveys, research, events and social media campaigns.

"As policymakers have been defining the policy actions to achieve greater competitiveness and sustainable growth, AFME's advocacy has put capital markets at the centre of the discussions, highlighting the key role they play in supporting governments, corporates, households and investors in mobilising resources towards growth and innovation"

A closer look at work in our tier 1 coverage countries follows:

France

During the past year, AFME engagement with French policymakers and stakeholders has been particularly intensive. This has included the AFME CEO participation in several senior events, as well as an ambitious programme of senior meetings with the Tresor, The Banque de France, the ACPR and the AMF in the context discussions on the banking competitiveness discussions, on the Market Integration Package (MISP), on DLT and digital assets, and on digital simplification.

The AFME Paris Forum has continued to provide key strategic guidance to AFME's activities in France. Moreover, it has provided an important platform for members to assess the progress in ensuring that the Paris financial centre strengthens its global attractiveness and openness to develop and international financial ecosystem. This has resulted in a series of constructive policy recommendations.

Several AFME senior committees – from the AFME Board to the European Public Policy Committee, from the Prudential Regulation Board to the Technology and Operation Committee – have been regularly in Paris, offering additional opportunities for AFME to interact with key stakeholders in France.

AFME also built a productive dialogue with the Franco-German Taks Force on Digital Finance, through a dedicated event in Paris and direct engagement with the key Franch officials leading that workstream.

Germany

In 2026, AFME strengthened its advocacy outreach in Germany through extensive engagement with policymakers, regulators and the wider financial ecosystem in Berlin, Frankfurt and Wiesbaden.

In February, AFME published its second capital markets study in cooperation with zeb Consulting, *The Mobilisation of Capital in Germany: Three Questions Around Private Investments*. Building on AFME's 2024 work on the role of capital markets in Germany, the study examined how private capital can support strategic investment and innovation, improve financing for start-ups and scale-ups, contribute to a more sustainable pension system and increase retail participation in capital markets. AFME complemented the study with German-language policy papers setting out practical recommendations.

The study provided an effective platform for senior outreach and helped connect the capital-markets debate to tangible economic outcomes. AFME engaged extensively with members of the German Bundestag, the Federal Chancellery, the Federal Ministries of Finance and Economic Affairs and Energy, Deutsche Bundesbank, BaFin, the State of Hesse and stakeholders from Germany's financial and business community. The study also received strong media coverage.

AFME was encouraged by the growing recognition in Germany that public funding alone cannot meet the country's long-term investment needs and that private capital must be mobilised more effectively. Policy discussions increasingly focused on practical mechanisms, including public-private investment vehicles, improved access to risk capital, pension reform and measures to strengthen Germany's start-up and scale-up ecosystem.

AFME also continued to convene members through the Frankfurt Forum, providing strategic guidance for its German advocacy and opportunities for direct dialogue with senior stakeholders.

Finally, AFME hosted its sixth European Financial Integration Conference in Frankfurt in May. The expanded conference brought together senior policymakers, regulators and market participants from across Europe to discuss financial integration, competitiveness and the Savings and Investments Union. Speakers included Commissioner Maria Luís Albuquerque, SSM Chair Claudia Buch, Deutsche Bundesbank's Michael Theurer, Governor Gabriel Makhlouf and EIOPA Chair Petra Hielkema.

UK

The past year saw the creation of the EPPC UK Subgroup. Established to complement and help steer AFME's advocacy activities in the UK, the subgroup has provided a dedicated forum for members to discuss emerging policy developments, identify advocacy priorities and provide strategic direction on key political and regulatory issues.

Alongside this, AFME continued to strengthen its engagement across Government, Parliament and the regulatory bodies. Through AFME's membership of the APPG for Financial Services and Markets, we contributed to discussions on the future development of the UK's financial services sector and the role of capital markets in supporting growth, investment and competitiveness.

A particular focus during the year was the publication of A Renewed Agenda for UK Financial Markets, which set out a series of recommendations to support deeper, more competitive and internationally attractive UK capital markets. The report formed the basis of a broad programme of engagement with Ministers, Parliamentarians, regulators and industry stakeholders, helping to ensure that wholesale market perspectives will reflected in discussions on the UK's new long-term growth strategy.

AFME also engaged extensively with the new Burnham Government following the change in political leadership in the UK. Building on the recommendations set out in A Renewed Agenda for UK Financial Markets, AFME undertook a programme of engagement to highlight the role that competitive and efficient financial markets can play in supporting the Government's objectives for growth, investment and economic development. This included engagement around the Government's emerging policy priorities and framing wholesale markets in the regional growth debate.

AFME also maintained an active dialogue with HM Treasury, the FCA, PRA and Bank of England on a range of policy issues affecting members. Key areas of engagement included prudential reform, capital markets development, digital finance and wider competitiveness initiatives. Advocacy activity throughout the year in the UK was guided by the objective of supporting a regulatory framework that is proportionate, internationally coherent and capable of supporting investment, liquidity and economic growth.

"The advocacy team works alongside policy divisions to ensure that industry's expertise and constructive recommendations are delivered to the official sector, so that it can be leveraged for effective policy actions. The team acts as a link between the financial industry and policy makers, helping AFME members understand and engage with crucial policy developments in the EU and UK."

Global Foreign Exchange Division

James Kemp
Managing Director, Global FX Division

Andrew Harvey
Managing Director, Europe, Global FX

- Secured EU exemptions for key FX spot benchmarks, while continuing to advocate for equivalent treatment in the UK.
- Advanced FX transaction reporting reform in the UK and EU, including support for a proposed UK FX exemption.
- Led UK and EU engagement on the FX implications of accelerated T+1 settlement.
- Identified market structure changes to improve efficiency and reduce risk across operations and prime brokerage.
- Worked closely with Korean supervisors on reforms to open and internationalise the local FX market.
- Leveraged the 2025 Future of Foreign Exchange Report to highlight trade allocation inefficiencies and the need to better identify capital and transaction costs.

Over the past year, the Global Foreign Exchange Division (GFXD) has continued to support efficient, resilient and well-functioning global FX markets, with a strong focus on post-trade efficiency, regulatory reform and the implications of market structure change.

GFXD achieved important progress on benchmark and reporting reforms. Following long-standing advocacy, the European Commission published its Benchmark Regulation Implementing Act, exempting FX spot benchmarks for INR, KRW, PHP and TWD. GFXD has continued to engage with HM Treasury and the Financial Conduct Authority (FCA) to advocate for a comparable outcome under the UK Benchmark Regulation. In parallel, GFXD worked with industry partners to respond to European and UK consultations on MiFIR transaction reporting, supporting proposals that would address duplication and reduce the burden of redundant processes.

Market structure change remained a central theme. GFXD assessed the implications of stablecoins, tokenised deposits and deposit tokens for FX markets, including through engagement on MAS Project Guardian and member roundtables in New York and London. GFXD also supported global advocacy on pre-hedging and continued work with ISDA on deliverable currency disruption definitions and fallbacks for inclusion in the updated 2026 FX and Currency Option Definitions.

"The GFXD continues to operate with dynamism, quickly adapting to new areas of interest or concern... a considerable book of work and all relevant"

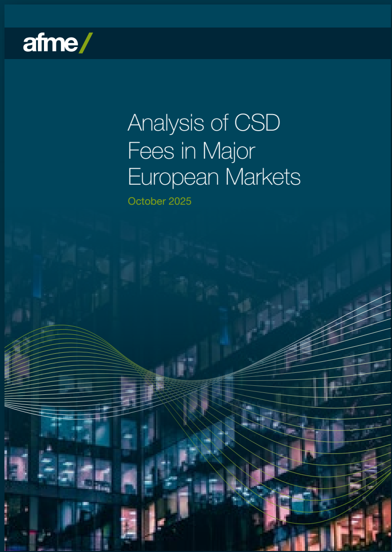
GFXD further supported members as capital markets prepare for accelerated settlement. Through industry webinars and engagement with supervisors and buy-side groups across the US, Europe and Asia, GFXD highlighted the FX implications of UK and EU moves to T+1 settlement. GFXD also published recommendations on payment automation and payment splitting to improve settlement risk and liquidity management, while continuing work on Korean FX reforms and beginning engagement with local banking associations in Vietnam and the Philippines to support efficient domestic FX market development.

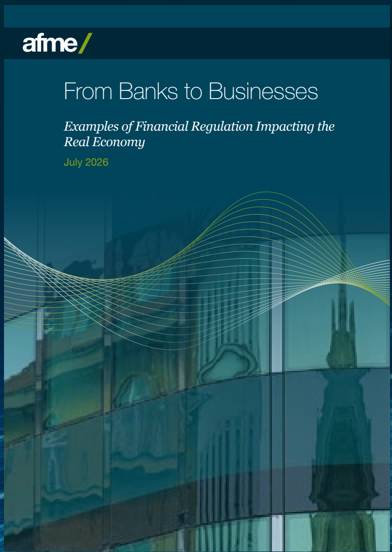
GFXD continued to leverage the 2025 Future of Foreign Exchange Report to highlight process inefficiencies and increased costs arising from trade allocation, including capital and transaction costs. Outreach focused on buy-side trade associations and supervisors, helping to raise awareness of growing cost pressures across the market.

GFXD also published a white paper on the impact of trade compression on limit monitoring processes within the FXPB market. The paper sets out recommended practices to optimise capital usage and operational efficiency for FXPB market participants.

Across these initiatives, GFXD has focused on ensuring that FX markets remain robust, competitive and capable of supporting cross-border capital flows as regulation, technology and settlement practices continue to evolve.

Publications





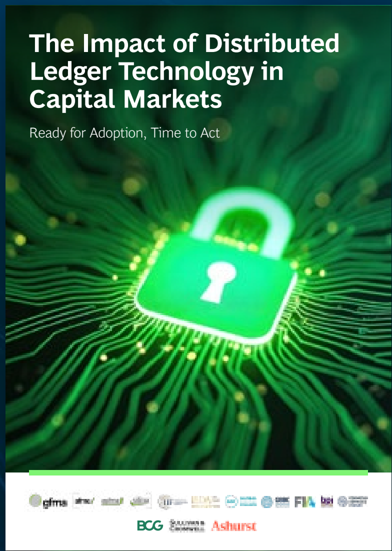

afme/
Linklaters
Updated edition
MiFIR / MiFID II reforms in the EU and the UK
Implementation guide for firms operating in wholesale secondary markets
November 2025


afme/
Simplifying the EU Capital Stack
March 2026


afme/
zeb
The mobilisation of capital in Germany
On three questions around private investments
partners for change


afme/
Future European DLT-based Financial Market Architecture
Vision and Recommendations
April 2026


afme/
KPMG
Bank Taxes in Europe
Examining the effects of banking taxes on banks, the macroeconomy and competitiveness
February 2026
EU Edition


The Impact of Distributed Ledger Technology in Capital Markets
Ready for Adoption, Time to Act
BCG
Ashurst

Membership

Full members

Banks

Full access to AFME’s committees and working groups, with the exception of three boards that are open only to banks holding a seat on the AFME Board (European Public Policy Committee, Prudential Board and Technology & Operations Committee).

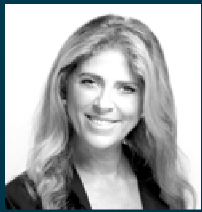
Brokers and Corporate Finance Advisers

Access is limited to six committees: Accounting, Compliance, High Yield, Securitisation, Sustainable Finance, and Tax, together with relevant working groups within Post-Trade, Technology & Operations, and selected MiFID working groups.

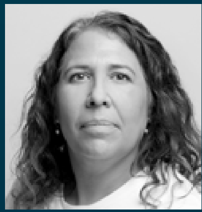
Associate members

Advisers and Service Providers

This category includes accounting firms, data and service provider, issuers, investors, law firms, rating agencies, stock exchanges and trustees,. Associate members have access to AFME’s committees and working groups in High Yield, Securitisation, and Sustainable Finance.



Elena Travaglini
Director, Head of Membership



Kristina Holland
CRM Membership Manager

As of 19 August 2026
Total Numbers

Associates: 79

Full: 63

6,865 representatives of member firms actively engaged

AFME's Visibility

In 2025–26, AFME continued to strengthen its profile as a leading voice on European capital markets through a broad programme of communications activity. Working across a wide range of policy areas, AFME produced commentary, research, digital content and publications that helped communicate industry perspectives on issues affecting the competitiveness, resilience and integration of European financial markets.

Communications activity supported AFME's work on topics including banking competitiveness, regulatory simplification, market integration, equities markets and securitisation. Through a combination of publications, commentary and digital content, AFME sought to increase awareness and understanding of key policy developments and their implications for capital markets participants.

Regulatory simplification remained a prominent theme throughout the year, reflecting its growing importance within the European policy agenda. Communications activity highlighted AFME's analysis and recommendations across a range of policy initiatives, helping to showcase the industry's perspective on creating a more proportionate and competitive regulatory framework. AFME also continued to communicate on developments relating to equity market structure in both the EU and UK, drawing attention to issues affecting market efficiency, liquidity and competitiveness.

Rebecca Hansford
Head of Communications and Marketing

Elisabeth Mauguy
Media Relations and Digital Content Manager

Giorgia Lu
Marketing Manager

Nicole Phillips
Website & Marketing Executive

> *"AFME continued to strengthen its profile as a leading voice on European capital markets through a broad programme of communications activity"*

“Thought leadership and timely commentary remained central to AFME’s communications programme”

Thought leadership and timely commentary remained central to AFME’s communications programme. Flagship publications such as the annual Capital Markets Union Key Performance Indicators report, alongside research covering topics including CSD fees, the EU capital stack, Distributed Ledger Technology (DLT) and the real-economy impact of financial regulation, helped reinforce AFME’s reputation for technical expertise and market insight.

Digital channels continued to play an important role in extending the visibility of AFME’s work. LinkedIn followers increased to 32,546 at the beginning of September, while content published throughout the year generated strong levels of engagement across a range of priority topics. Reports, insights and multimedia content helped make complex policy issues more accessible to broader audiences.

Marketing activity supported AFME’s policy, membership and events objectives through website management, email marketing, digital campaigns and audience engagement initiatives. During the year, the website attracted more than 202,000 visitors and generated over 2 million content interactions, including page views and resource downloads. Email campaigns and targeted digital marketing increased the visibility of AFME publications, insights and events. Ongoing enhancements to marketing automation, audience segmentation and the marketing preferences portal strengthened members engagement and supported the delivery of AFME’s event programme.

Snapshot of AFME's media profile

Engagement

32,546
LinkedIn followers

614k
total page views

157k
EU and UK website users

Impact

115
Consultations responded to

22
Expert publications produced

30
Data reports each year

Conferences & Events

AFME events continue to bring together influential industry leaders, policy makers, regulators, and other stakeholders from across the financial markets to engage on the most pressing issues facing capital markets in the EU and UK.

Joanna Montague
Events Director

Emma Bagge
Senior Content, Sponsorship and Event Manager

Sarah Noakes
Senior Content, Sponsorship and Event Manager

Emily Jalloh
Event Co-ordinator

Lucy Clough
Event Administrator

Cheryl Chickowski
Partnerships and Business Development Consultant

Safiya Merrique
Event Sponsorship Manager

Over the last 12 months, AFME's events programme delivered strong member engagement, expanded high-value industry networks and reinforced our role as a trusted forum for regulatory, policy and market debate. Our dynamic calendar of conferences, topical webinars and networking dinners gave industry participants opportunities to engage with high-quality content, exchange ideas, and build valuable connections across Europe's capital markets.

In Autumn 2025 we held our ninth annual European Compliance & Legal Conference in London. Over two days, delegates heard keynote addresses from ESMA, the FCA, European Commission and AMLA. For the second year, we also hosted a Future Leaders Roundtable focussed on how emerging compliance professionals can build their personal brand.

The fourth edition of OPTIC took place in Amsterdam in October. Key topics covered on the agenda included T+1, AI and cyber, DLT, operational resilience, settlement, clearing, and asset servicing - themes that remain highly relevant as we prepare for the 2026 event.

Later in the month we held the European High Yield and Private Credit Conference. With an increased focus on private credit, the event examined market growth, evolving fundraising and deployment strategies, regulatory developments, and the role of private capital in financing European corporates.

In November, we celebrated 20 years of the European Government Bond conference. The programme featured keynote addresses from Lee Foulger of the Bank of England and Imène Rahmouni-Rousseau, from the European Central Bank. Later in the month we were in Brussels again, hosting a seminar to launch the eighth edition of our CMU Key Performance Indicators Report. The event featured John Berrigan and Peter Csonka, who shared perspectives on the European Commission's work to strengthen EU capital markets and support economic growth.

The year ended with our fourth collaboration with DealCatalyst on the Specialist Lenders Forum. Louis Taylor, CEO of British Business Bank gave a keynote on the role of private markets in the UK.

We kicked off 2026 with our financial services dinner in Brussels, bringing together senior representatives of EU institutions, Member States, international bodies and AFME's pan-European membership. We welcomed Paul S. Atkins, Chairman of the U.S. Securities and Exchange Commission and Jan-Oliver Sell, CEO of Qivalis, as guest speakers for the evening.

"AFME's event provided the perfect platform to engage directly with regulators and gain insights in to upcoming changes in compliance frameworks."

Head of Compliance, EIB

At the end of February, the third European Direct Lending & Middle Market Finance Conference, another DealCatalyst collaboration, took place in London.

In early Spring, we hosted our annual Equities dinner at the prestigious Dorchester Hotel. And for the fourth consecutive year we ran a UK Residential Mortgage Finance seminar in collaboration with Simmons and Simmons.

In April we returned to Madrid for the 17th edition of our Spanish Capital Markets conference where Carlos San Basilio, Chairman of CNMV delivered the opening keynote on their vision for market integration.

May was a particularly busy month, which started with an off-the-record roundtable convened at the behest of the PRA on how the PRA's Secondary Competitiveness and Growth Objective is shaping its policy approach, including recently proposed prudential and conduct reforms for securitisation. Over 50 AFME members and other market participants joined the discussion, which provided a valuable opportunity to engage directly with the PRA during the live consultation period, share perspectives, and contribute to the evolving regulatory framework.

Our fifth European Financial Integration conference then took place in Frankfurt. Growing to a one-and-a-half-day event, this year the focus was on the practical steps needed to accelerate progress towards a more integrated European financial market. The audience heard from a strong line-up of speakers from EU regulatory bodies and market participants, including Maria Luis Albuquerque, Claudia Buch, Rodrigo Buenaventura, Petra Hielkema and Gabriel Makhlouf.

In the same week, we delivered our Sustainable Finance conference in Amsterdam. Despite challenging conditions for the sector in recent years, this event continued to provide a forum for influential sustainable finance policy setters and market leaders share updates on key market challenges and discuss the direction of upcoming trends and directives.

"Great speakers in a well-curated line-up of speeches and panels. Great networking opportunities."

Attendee, European Financial Integration Conference

"Comprehensive agenda and high-quality speakers, resulting in tangible proposals for improvements at a critical time for European Capital markets."

Attendee, Spanish Capital Markets Conference

Our final event of the month was our High Yield Black Tie Dinner at The Savoy in London, where over 200 guests enjoyed a talk from Rebecca Adlington OBE, Great Britain's most successful female swimmer.

In June, we celebrated a record-breaking 30th anniversary of Global ABS, with over 6,000 registrations and 5,650+ on-site attendees from more than 50 countries. Mohamed El-Erian, Chief Economic Advisor at Allianz, opened the event in conversation with FT Markets columnist Katie Martin on the global economic outlook, while Lord Mark Sedwill, former Cabinet Secretary and UK National Security Adviser, addressed the geopolitical outlook on day two.

As summer began, we hosted our third annual Next Gen networking event, providing young industry professionals with a relaxed setting to connect and foster new relationships.

Over the course of the year, we continued to deliver a programme of webinars, attracting over 550 members and non-members to discussions on the future of MiFID transaction reporting; bank taxes in Europe; the future of DLT-based financial markets architecture; preparing for the EU AML framework; and the evolving efficiency settlement landscape.

We also ran our 'Women in Compliance and Legal' series, in collaboration with Latham & Watkins. These sessions brought together women within the industry to connect, gain insight, and join discussions on leadership and the evolving regulatory landscape.

Our autumn 2026 schedule will once again feature our annual conferences: Paris will host the 10th anniversary of our European Compliance & Legal event, OPTIC will return to London in October, and AFME will support DealCatalyst's Investors' Conference on UK Mortgage Finance.

"Global ABS is the single most efficient way to connect with everyone that matters in ABS in Europe, there is no alternative."

Attendee, Global ABS 2026"

"It's the go-to event for structured finance. Everyone is there, in one place - you just have to be there!"

Karen Lomax, HSBC

AFME Board Members

Bank of America
Barclays
BBVA
BNP Paribas
BNY
citi
Crédit Agricole Corporate & Investment Bank
Deutsche Bank
Goldman Sachs
HSBC
ING
Intesa Sanpaolo IMI Corporate & Investment Banking
J.P.Morgan
Lloyds
Morgan Stanley
Natixis Corporate and Investment Banking
NatWest
Nomura
Northern Trust
Santander
Societe Generale
standard chartered
State Street
UBS
UniCredit

AFME's Board of Directors

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Justin Chapman, Executive Vice President - Global Executive Securities Services and Global Head Market Advocacy & Innovation, Northern Trust

Carlos Ciervide, Head of Market Activities in Spain and Portugal, Santander

Mandy DeFillipo, CEO, US & Americas, Europe, Middle East, Africa and Pakistan, Standard Chartered

Marc Denjean, Global Head of Credit Markets, Natixis

Michael Eldridge, UK Head of Global Markets and interim Head of EMEA, State Street

Adam Farkas, CEO. AFME

Nelius De Groot, Head of Markets, International, BNY

Vanessa Holtz, BofASE CEO and France Country Executive, Bank of America

Gary Hyman, Head of EMEA GM Public-side Sales & Co-Head of G10 Global Rates Sales, Nomura

Hubert De Lambilly, Head of Continental Europe, Middle East & Africa, Global Markets, BNP Paribas

David Lewis, Global Head of Supervisory and Transaction Management Office, JP Morgan

Fabio Lisanti, Head of Markets for Western Europe, Citi

Antoine Maurel, Head of MSS Europe and MENAT, HSBC

Massimo Mocio, Head of Global Markets & Investment Banking, Deputy Chief of IMI Corporate & Investment Banking Division, Intesa Sanpaolo

Miray Muminoglu, Managing Director, Head of Securitised Products Group, Lloyds

Hatem Mustapha, Co-Head of Global Market Activities and Head of Equities & Equity Derivatives, Société Générale

Mario Muth, Global Head of Platforms Sales and Fixed Income Market Structure, Deutsche Bank

Shane O'Cuinn, Global Head of Interest Rates Trading, UBS

Jonathan Peberdy, CEO and Head of Capital Markets, NatWest Markets

Gary Prince, Global Head of FX & Rates Trading and, Head of Financial Markets EMEA, ING

Raoul Salomon, France CEO and Co-Head of Markets in Barclays Europe, Barclays

Alison Sharpe, Managing Director, European Head of Fixed Income Sales, Morgan Stanley

Rita Sqalli, Global Chief Operating Officer and Chief of Staff for Global Markets, Crédit Agricole

Lesley Steele, Chief Risk Officer EMEA, Goldman Sachs

Graham Williams, UK Country Head for Unicredit Bank AG, Unicredit

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