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FinReg Monthly Update

Regulatory & Compliance on **April 2026**

Welcome to the FinReg Monthly Update, a regular bulletin highlighting the latest developments in UK, EU and U.S. financial services regulation.

Key Developments in April 2026:

United Kingdom

General Financial Services – Cross Sector

29 April 2026 – BoE/PRA: The Bank of England and the PRA have published finalised statements of policy outlining their approach to cost benefit analysis.

24 April 2026 – FCA Handbook: The FCA has published Handbook Notice 140, which sets out changes to the FCA Handbook made by the FCA Board on 26 March 2026 and 23 April 2026.

22 April 2026 – SM&CR: HM Treasury published its response to its consultation on phase 2 of reforming the Senior Managers and Certification Regime.

22 April 2026 – SM&CR: The FCA published its policy statement for the final phase 1 rules on reforming the Senior Managers and Certification Regime.

21 April 2026 – FCA: The FCA published findings from a review of how principal firms manage potential risks from inactive appointed representatives (ARs), setting out good practices and areas for improvement.

20 April 2026 – FCA: The FCA has published its innovation insights report for 2025.

14 April 2026 – Open Finance: The FCA published a report on its vision for open finance to empower consumers and businesses. The report sets out the FCA's "ambitious" plan to deliver open finance, providing a roadmap from now until 2030.

1 April 2026 – FOS: The Financial Ombudsman Service has announced an increase to its award limits.

Asset Management / Wealth Management

30 April 2026 – Funds: The FCA published a policy statement (PS26/7) on rules and guidance to support the adoption of fund tokenisation and a roadmap for future regulatory developments.

9 April 2026 – Investments: The Investment Association has published guidance for firms on disclosing risks in mainstream investment promotions.

9 April 2026 – Asset Managers: The FCA has published a webpage listing the common issues it sees with applications for authorisation from asset managers that have reduced firms' chances of success or caused delays.

Banking / Payments / Consumer Credit

30 April 2026 – Credit: The Credit Institutions and Investment Firms (Miscellaneous Definitions) (Amendment) Regulations 2026 (SI 2026/480) have been made and published on legislation.gov.uk.

29 April 2026 – PRA: The PRA published a speech given by Charlotte Gerken on progress in mutuals sector supervision.

29 April 2026 – Consumer Credit: The FCA has published a consultation paper (CP26/15) on changes to the consumer credit financial promotion rules.

23 April 2026 – PRA: The PRA has published low impact amendments made to its rules and policy material.

23 April 2026 – PRA: The PRA has published a consultation paper on low impact amendments to its rules and policy material.

22 April 2026 – SM&CR: The PRA published its policy statement for the final phase 1 rules on reforming the Senior Managers and Certification Regime.

21 April 2026 – Payments: HM Treasury has published a response to its consultation on the proposed approach to consolidating the Payment Systems Regulator's functions within the FCA.

17 April 2026 – BoE: The Bank of England published a consultation paper on supervisory fees for financial market infrastructures for 2026/27.

17 April 2026 – PRA: The PRA published a consultation paper on regulated fees and levies rates for 2026/27.

17 April 2026 – PRA: The PRA published its Business Plan for 2026/27.

13 April 2026 – BoE: The Bank of England has published guidance on how it could implement the UK's resolution regime in the event of a bank failure.

2 April 2026 – Credit: The FCA has published directions and a form relating to the temporary permissions regime for deferred payment credit lenders.

1 April 2026 – Mortgages: The PRA and the FCA have published a joint consultation paper on high loan-to-income lending.

1 April 2026 – Macroprudential: The Bank of England published the record of the meeting of its Financial Policy Committee.

Insurance

30 April 2026 – Risk transfer regime: HM Treasury has published a response to its July 2025 consultation paper on reforming the insurance risk transfer regime under the Risk Transformation Regulations 2017 (*SI 2017/1212*) (RTR 2017).

29 April 2026 – PRA: The PRA has published a consultation paper setting out proposed changes to rules and expectations relating to life insurers' funded reinsurance arrangements under the Solvency UK regime.

28 April 2026 – Insurance Products: The International Association of Insurance Supervisors (IAIS) has published a draft issues paper on customers receiving value from insurance products.

16 April 2026 – Wholesale Insurance business: The Lloyd's Market Association (LMA) has published guidance to help managing agents apply the FCA's more proportionate regulatory approach to commercial and wholesale insurance business, set out in the FCA's December 2025 policy statement (PS25/21).

Cryptoassets / Artificial Intelligence / Cyber Security

30 April 2026 – Cryptoassets: The FCA published information for firms planning to apply for authorisation under the new cryptoassets regulatory regime. It has also announced that firms can request a pre-application meeting from 11 May 2026.

24 April 2026 – Cyber: The FCA published an overview of insights from its 2025 cyber co-ordination group meetings.

21 April 2026 – Cryptoassets: HM Treasury published a policy note and draft statutory instrument (SI) on amendments to the Financial Services and Markets Act 2000 (Cryptoassets) Regulations 2026 (SI 2026/102).

21 April 2026 – AI: The FCA published a speech given by Jessica Rusu, FCA Chief Data, Information and Intelligence Officer, on supporting Fintech in the next phase of innovation.

16 April 2026 – AI: The House of Commons Treasury Committee published a report setting out responses from HM Treasury, the Bank of England and the FCA to its January 2026 report on AI in financial services.

15 April 2026 – Cryptoassets: The FCA published a consultation paper on its proposals to amend its Perimeter Guidance manual (PERG) to clarify the scope of the new regulated cryptoasset activities and when permission is needed to carry on those activities (CP26/13).

2 April 2026 – AI: The Financial Ombudsman Service (FOS) published its response to the FCA's review into the implications of advanced AI on retail financial services (the Mills review).

1 April 2026 – AI: The Digital Regulation Co-operation Forum has published a foresight paper on the future of agentic AI.

1 April 2026 – AI: The Bank of England and the PRA have published a letter on AI in financial services, which responds to a letter (dated 28 January 2026) from the Department for Science, Innovation and Technology (DSIT) and the Department for Business and Trade (DBT). The regulators' letter responds to a request to publish a plan, by May 2026, setting out how they will help enable safe AI-powered innovation in the financial services sector and to explain how they intend to report on their progress every year.

Securities / Capital Markets

29 April 2026 – Market Abuse: The FCA published issue 85 of Market Watch, in which it discusses how the Economic Crime and Corporate Transparency Act 2023 (ECCTA) can assist firms in sharing customer information to combat economic crime.

27 April 2026 – Capital Markets: The FCA published Primary Market Bulletin 63.

27 April 2026 – IPOs: The FCA published a consultation paper on changes to information flows for UK equity IPOs.

20 April 2026 – Capital Markets: The FCA published the findings following its multi-firm review on market soundings in UK equity capital market transactions in listed shares in wholesale banks.

16 April 2026 – Short Selling: The FCA published a policy statement on changes to the UK short selling regime.

16 April 2026 – FMI: CPMI and IOSCO have published a report on UK implementation of principles for financial market infrastructures.

8 April 2026 – Capital Markets: The FCA published Primary Market Bulletin 62, covering the key aspects of its misleading statements case against Carillion plc; the FCA's concerns about potentially manipulative investment approaches; sponsors' work on the modified transfers process, and the deadline to respond to CP26/8.

2 April 2026 – Reporting: The FCA and the Bank of England have published the terms of reference for transaction and post-trade reporting taskforce.

1 April 2026 – Markets: The Bank of England published a feedback statement on enhancing the resilience of the gilt repo market.

Financial Crime / Enforcement / Sanctions

15 April 2026 – Sanctions: The Office of Financial Sanctions Implementation (OFSI) has published its Strategy 2026–2029, setting out how it plans to operate over the next three years.

8 April 2026 – Financial Crime: The FCA has published a webpage containing the findings of its multi-firm review of customer due diligence (CDD), enhanced due diligence (EDD) and ongoing due diligence controls.

Other

29 April 2026 – Pensions: On 29 April 2026, the Pension Schemes Bill 2025 received Royal Assent becoming the Pension Schemes Act 2026.

European Union

Banking / Payments / Consumer Credit

29 April 2026 – CRD: The EBA published its final report on supervisory independence of competent authorities under the CRD IV Directive.

29 April 2026 – CRR: The EBA has published a decision to partially delete sections of its guidelines on the treatment of connected clients under the Capital Requirements Regulation.

28 April 2026 – CRR: The EBA has published updates on closely correlated currencies.

23 April 2026 – CRR: The EBA published an opinion on amendments to draft regulatory technical standards on operational risk under the Capital Requirements Regulation (CRR).

23 April 2026 – Payments: The Council of the EU has published notes from its General Secretariat to the Permanent Representatives Committee setting out final compromise texts for the legislative proposals on the Directive on payment services and electronic money services in the internal market and the Regulation on payment services in the internal market.

22 April 2026 – CRR: The European Commission published for consultation a draft Delegated Regulation on the own funds requirements for market risk under the Capital Requirements Regulation (CRR).

20 April 2026 – CMDI: Regulation (EU) 2026/808, Directive (EU) 2026/806 and Directive (EU) 2026/804 have been published in the *Official Journal of the European Union*. The legislation amends the Single Resolution Mechanism (SRM) Regulation, the Bank Recovery and Resolution Directive (BRRD) and the Deposit Guarantee Schemes Directive (DGSD) respectively, which relate to the European Commission's review of the EU bank crisis management and deposit insurance (CMDI) framework.

20 April 2026 – Banking: The EBA has published its response to the European Commission's consultation on competitiveness in the EU banking sector.

16 April 2026 – CRR: The European Commission adopted regulatory technical standards specifying an equivalent mechanism for unfinished property under the CRR.

16 April 2026 – Banking: The SRB published its response to the European Commission's consultation on competitiveness in the single banking market.

14 April 2026 – Banking: The Eurosystem published its response to the European Commission's consultation on competitiveness in the single banking market.

13 April 2026 – BRRD: The EBA published a report on banks' dry run testing of recovery plans under the Bank Recovery and Resolution Directive (BRRD).

10 April 2026 – CRR: The EBA published consultation papers on simplifying supervisory reporting under the CRR.

10 April 2026 – SEPA: The EBA published a decision harmonising how national competent authorities (NCAs) report data under the SEPA Regulation.

9 April 2026 – CRR (76): The EBA published a consultation on revised guidelines on limits on exposures to shadow banking entities.

Insurance

28 April 2026 – Solvency II: An implementing regulation updating exposures to central government under Solvency II has been published in the Official Journal.

24 April 2026 – IRRD: EIOPA published final reports on technical standards under the Insurance Recovery and Resolution Directive.

21 April 2026 – Insurance: The IAIS published a report following peer review of ICP 13.

20 April 2026 – Solvency II: EIOPA published its final report on revised guidelines on exchange of information within colleges.

16 April 2026 – Solvency II: EIOPA has published a consultation on a new annex to its opinion on risk mitigation techniques.

15 April 2026 – Solvency II: EIOPA has published a consultation paper on its proposals to shorten 13 sets of guidelines made under the Solvency II Directive.

14 April 2026 – AI: EIOPA has outlined proposals clarifying the application of the EU AI Act to the insurance sector.

7 April 2026 – Solvency II: EIOPA has published a report containing the technical specification for the calculation of criteria for small and non-complex undertakings (SNCUs) and groups (SNCGs) under the Solvency II Directive.

Securities / Capital Markets

30 April 2026 – Markets: ESMA published a call for evidence on the market structure of EU equity markets.

30 April 2026 – CCPs: ESMA published the methodological framework for its sixth EU-wide stress test exercise for central counterparties (CCPs).

27 April 2026 – Benchmarks: A Commission Implementing Regulation on FX benchmarks exempt under the Benchmarks Regulation has been published in the Official Journal.

16 April 2026 – Ratings: ESMA published a call for evidence on restricted subscription and private credit ratings.

14 April 2026 – MiFID: The European Commission adopted a Delegated Regulation supplementing the MiFID II Directive with regard to regulatory technical standards (RTS) specifying the criteria to be taken into account by investment firms when establishing and assessing the effectiveness of their order execution policies. The Delegated Regulation has been made under Article 27(10) of the MiFID II Directive (as amended by the MiFID III Directive).

13 April 2026 – EMIR: ESMA has published reporting templates and instructions for active account requirement reporting under EMIR.

8 April 2026 – MAR: The European Commission adopted Delegated Regulations on disclosures and trading under the Market Abuse Regulation.

Sustainable Finance / ESG

29 April 2026 – ESG: ESMA published a consultation on guidelines on the endorsement regime under Article 11 of the ESG Rating Regulation.

24 April 2026 – ESG: The European Commission has adopted two Commission Delegated Regulations supplementing the ESG Ratings Regulation relating to fees charged to, and fines and penalty payments imposed on, ESG rating providers by ESMA.

21 April 2026 – ESG: The European Commission adopted a Delegated Regulation setting out regulatory technical standards (RTS) specifying the elements of ESG rating products to be disclosed to the public and to users of ESG ratings, rated items and issuers of rated items under Regulation.

21 April 2026 – ESG: The European Commission adopted Delegated Regulation setting out regulatory technical standards (RTS) specifying the measures and safeguards to be implemented by ESG rating providers to separate their ESG rating activities from other activities under Regulation (EU) 2024/3005 (ESG Ratings Regulation).

Other

24 April 2026 – Single Market: On 24 April 2026, the European Commission, the Council of the EU and the European Parliament agreed and signed the One Europe, One Market Roadmap. The Roadmap is a political and operational commitment under which the EU institutions aim to deliver on a series of legislative and policy measures to strengthen the Single Market and improve the EU's competitiveness by the end of 2027 at the latest.

14 April 2026 – Reporting: ESMA published official translations of its guidelines on submission of periodic information.

United States

Asset Management / Wealth Management

27 April – SEC Staff Issues No-Action Relief to Expand Co-Investment Framework to Open-End Funds: The SEC's Division of Investment Management issued a no-action letter stating it would not recommend enforcement action if open-end funds (including mutual funds and ETFs) advised or sub-advised by the applicant were to rely on an existing simplified co-investment exemptive order as "Regulated Funds," subject to compliance with the order's conditions. The staff also provided relief permitting the "required majority" of the board approval for certain affiliated co-investment transactions to be satisfied by a committee of the fund's board, provided the committee consists of at least three disinterested directors and reports to the full board. While this no-action letter is fact-specific, it signals a willingness by the staff to flexibly apply co-investment frameworks where appropriate governance, liquidity constraints, and investor protections are maintained. This no-action letter may be relied upon by other fund complexes that have previously received simplified co-investment exemptive orders, and it is possible that its conditions may begin to be included in future exemptive orders.

20 April – SEC and CFTC Jointly Propose Amendments to Form PF: The SEC and the CFTC jointly proposed amendments to Form PF aimed at significantly reducing reporting obligations for private fund advisers while preserving data relevant to systemic risk monitoring and investor protection. The proposal would raise the Form PF filing threshold from $150 million to $1 billion in private fund assets under management (thus eliminating reporting requirements for nearly half of current filers) and increase the "large" hedge fund adviser threshold from $1.5 billion to $10 billion. The agencies also proposed streamlining or eliminating numerous Form PF reporting requirements and are seeking input on whether and how Form PF should capture information related to private credit funds. Comments are due June 23, 2026.

Cryptoassets / Payments / Artificial Intelligence

13 April – SEC Trading and Markets Staff Issues Statement on Broker-Dealer Registration for Certain Crypto User Interfaces: The SEC's Division of Trading and Markets issued a staff statement outlining circumstances in which providers of certain user interfaces used to prepare transactions in crypto asset securities (e.g., web-based, mobile, or wallet-embedded applications that generate transaction instructions for self-custodial wallets) would not be required to register as broker-dealers under Exchange Act Section 15(a). The statement describes a limited, non-exclusive set of conditions focused on the absence of transaction discretion, solicitation, custody, execution or routing, and emphasizes objective parameters, fixed and transparent fees, and robust disclosures and controls. The staff noted that the interim measure will be withdrawn after five years absent SEC action.

3 April – Treasury Proposes Framework for State-Level Regulation Under the GENIUS Act: The U.S. Department of the Treasury issued a notice of proposed rulemaking seeking public comment on how to determine whether a state-level regulatory regime is "substantially similar" to the federal framework established by the Guiding and Establishing National Innovation for U.S. Stablecoins ("GENIUS") Act. Under the GENIUS Act, payment stablecoin issuers with $10 billion or less in outstanding issuance may opt into qualifying state-level regulation rather than federal oversight. Comments are due June 2, 2026.

Financial Crime/ Enforcement / Sanctions

10 April – Treasury Proposes Anti-Money Laundering and Sanctions Framework for Permitted Payment Stablecoin Issuers: The Treasury Department, through the Financial Crimes Enforcement Network ("FinCEN") and the Office of Foreign Assets Control, jointly proposed regulations to implement the GENIUS Act's requirements applicable to "permitted payment stablecoin issuers" ("PPSIs"). The proposal would treat PPSIs as financial institutions for purposes of the Bank Secrecy Act, subjecting them to comprehensive, risk-based anti-money laundering obligations, including customer identification, suspicious activity monitoring and reporting, recordkeeping, and the ability to block, freeze or reject unlawful transactions. The proposal would also require PPSIs to establish and maintain effective economic sanctions compliance programs. Comments are due by June 9, 2026.

8 April – SEC Appoints David Woodcock as Director of the Division of Enforcement: The SEC announced that David Woodcock will become Director of the Division of Enforcement effective May 4, 2026, succeeding Acting Director Sam Waldon. Mr. Woodcock, a former SEC regional director and most recently a partner in private practice, joins the agency as it continues to refocus enforcement priorities.

7 April – SEC Announces Enforcement Results for Fiscal Year 2025: The SEC released its enforcement statistics for fiscal year 2025, reporting 456 enforcement actions and orders totaling $3.0 billion in monetary relief (after adjustment to remove a large uncollectable judgment in a financial crisis-era Ponzi scheme), representing year-over-year declines of 22% and 63%, respectively. Enforcement actions involving investment advisers and investment companies represented 22% of such actions. The SEC stated that these declines represent a deliberate recalibration of the Enforcement Division's priorities and a shift away from "regulation by enforcement" and volume-driven metrics to a focus on individual accountability and meaningful investor remediation.

2 April – Federal Court Grants Summary Judgment in CFTC Hedge Fund Valuation Fraud Case: A federal court granted the CFTC's motion for summary judgment against a former hedge fund manager, finding he engaged in a multi-year fraudulent scheme to manipulate and overvalue swap positions held by CFTC-regulated commodity pools. The court ordered the defendant to pay a $2.2 million civil monetary penalty and imposed permanent trading and registration bans, citing the egregious nature of the misconduct and substantial investor harm. The case underscores the CFTC's continued focus on valuation integrity, misrepresentation and fraud, particularly where the misconduct results in direct investor harm.

Securities / Capital Markets

16 April – SEC Seeks Public Comment on the Consolidated Audit Trail and Other Market Data Systems: The SEC issued a concept release requesting public comment on a comprehensive review of the Consolidated Audit Trail ("CAT") and other audit trails and market data sources used in U.S. securities regulation. The release seeks input on the CAT's regulatory purpose, governance and structure, scope and design, funding and cost management, and cybersecurity and data-privacy protections, and aligns with certain Commissioners' longstanding concerns about the tool's cost and implications for investor privacy. While the SEC noted that recent reforms have reduced projected CAT operating costs and eliminated the reporting of personal identifiable information, the proposal signals that further structural changes may be considered. Comments are due June 22, 2026.

16 April – SEC Issues Exemptive Order Allowing Shortened Tender Offer Periods for Equity Securities: Acting through its Division of Corporation Finance, the SEC issued an exemptive order permitting certain tender offers for equity securities to remain open for a minimum of 10 business days, rather than the standard 20-business-day period required under Exchange Act Rules 13e-4 and 14e-1. The relief applies to specified tender offers for equity securities of reporting companies, subject to certain enumerated conditions, as well as issuer tender offers for non-reporting companies, which could be useful for private funds engaging in certain "GP-led" transactions. The order is intended to modernize tender offer mechanics, reflect technological developments and reduce exposure to market volatility.

15 April – SEC Approves Treasury Market Cross-Margining Relief: The SEC issued a conditional exemptive order and approved a related Fixed Income Clearing Corporation rule change permitting customer cross-margining between cash U.S. Treasury securities and Treasury futures positions for certain dually registered broker-dealers that are also futures commission merchants. The action extends cross-margining benefits, which were previously available only to clearing members, to eligible customer positions, subject to specified conditions, and aligns with parallel relief issued by the CFTC. The agencies emphasized that the measures support the implementation of Treasury clearing reforms, enhance liquidity, and promote the resilience of the U.S. Treasury market.

Other

21 April – Supreme Court Hears Argument on SEC Disgorgement Authority: The U.S. Supreme Court heard oral argument in *Sripetch v. SEC*, a case challenging the SEC's authority to seek disgorgement of ill-gotten gains without proving that investors suffered quantifiable financial harm. The case arises from a civil enforcement action against a promoter of penny-stock companies who was ordered to disgorge approximately $3.3 million. During oral argument, a majority of the justices appeared receptive to the SEC's position, suggesting it may be difficult to assemble a majority to curtail the SEC's use of disgorgement as a core enforcement remedy.

16 April – SEC Chairman Launches "Material Matters" Podcast: The SEC announced the launch of *Material Matters with SEC Chairman Paul Atkins*, a new podcast intended to provide market participants and the public with insight into the Commission's policy priorities and rulemaking agenda. The inaugural episode features interviews with Commissioners Mark Uyeda and Hester Peirce, with future episodes set to include senior SEC officials and external stakeholders from government and industry.

10 April – SEC Issues No-Action Relief and Signals Rulemaking on Foreign Bail-In Transactions: The SEC's Division of Corporation Finance issued a no-action letter stating that it would not recommend enforcement action if securities exchanged pursuant to the Bank of England's statutory bail-in powers are not registered under the Securities Act, relying on Section 3(a)(9). This addresses an important U.S. law issue that had created challenges during previous bank resolutions. In a related public statement, SEC Chairman Paul Atkins emphasized the importance of regulatory clarity for emergency foreign bank resolution actions that may affect U.S. investors and global markets, and signaled that further exemptive rulemaking may be forthcoming.

2 April – CFTC Files Actions Seeking to Reinforce its Exclusive Jurisdiction Over Prediction Markets: In April, the CFTC took several actions underscoring its view that prediction markets and event contracts fall squarely within its exclusive jurisdiction under the Commodity Exchange Act. The CFTC pursued litigation against multiple states (*e.g.*, New York, Wisconsin, Arizona, Illinois, Connecticut) to challenge state-level efforts to restrict or regulate CFTC-registered designated contract markets, asserting federal preemption in this area. Also in April, the CFTC brought its first-ever insider trading case involving event contracts, charging an active-duty U.S. Army service member with insider trading in event contracts impacted by the military action in Venezuela.

Related Professionals

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