








Asset Management & Investment Funds Update

June 2022

Key Dates & Deadlines: Q2 / Q3 2022

DATE	SOURCE	SUMMARY	ACTION/IMPACT
25 May		Revised Irish UCITS Regulations published to facilitate preparation of a PRIIPs KID in satisfaction of UCITS KIID rules with effect from the application of PRIIPs rules to UCITS from 1 January 2023. Under new Regulation 102A (effective 1 January 2023) the preparation of a PRIIPs KID satisfies UCITS KIID rules and the Central Bank will not require the production of a UCITS KIID where a PRIIPs KID has been prepared.	<p>Advance preparations for compliance with the PRIIPs deadline for UCITS of 1 January 2023, at which point UCITS must produce:</p> <ul style="list-style-type: none"> • a PRIIPs KID for EEA retail investors • either a PRIIPs KID or UCITS KIID for professional investors • a UCITS KIID for any UK investors <p>See here for further details.</p>
30 June (30 September and 31 December)		Second calculation date for entity-level assessment of principal adverse impacts (PAIs) of investment decisions under SFDR Article 4(1)(a), (3) or (4) and draft SFDR Level 2, Chapter II.	<p>Implement processes and procedures for the collection of data necessary to calculate PAIs on each of the calculation dates during the first PAI reference period of January – December 2022 ahead of the publication of the first PAI statement by 30 June 2023.</p> <p>See here for further details.</p>

<p>Q3 (exact date to be confirmed)</p>		<p>Deadline for filing PPSNs for beneficial owners of ICAVs, ILPs, CCFs and unit trusts with the Central Bank as Registrar for the relevant beneficial ownership register.</p>	<p>Relevant fund vehicles to gather PPSNs for beneficial owners and for those without PPSNs, identify whether a Central Bank reference number is available and, if not, prepare to file declarations in accordance with specified regulatory process.</p> <p>See here for further details.</p>
<p>Q3 (exact date to be confirmed)</p>		<p>Revised ESMA MiFID Suitability Guidelines, updated to take account of sustainable preference rules, expected to be finalised.</p>	<p>In-scope fund managers to advance compliance preparations for MiFID sustainable preference rules effective 2 August 2022 (see below) absent final ESMA guidelines which are not expected to be published in advance of 2 August deadline.</p> <p>See here for further details.</p>
<p>6 July</p>		<p>Anticipated end of SFDR Level 2 legislative scrutiny period following which, if no objections are raised on the Commission's adopted text, SFDR Level 2 will enter into force and be applicable from the scheduled date of 1 January 2023.</p>	<p>Advance preparations for, as applicable, disclosure of entity-level PAIs and product-level green/social characteristics/objectives using the mandated disclosure templates appended to SFDR Level 2.</p> <p>See here for further details.</p>
<p>21 July</p>		<p>Scheduled completion date for Commission review of MMFR under the legislation.</p>	<p>Action required will depend on the draft proposals issued by the European Commission to potentially amend the MMFR.</p> <p>See here for further details.</p>
<p>31 July</p>		<p>New Central Bank 'Fund Profile V2' regulatory return required to be filed by existing funds (authorised on or before 29 April 2022) in respect of report date 30 April 2022 on ONR.</p>	<p>Following the introduction of a new version of the Fund Profile return, which delayed the December 2021 annual Fund Profile return filing, a once-off mid-year filing of this return by existing funds is required. For future returns, the return dates will revert to as of 31 December and due by 28/29 February beginning with the return for 31 December 2022.</p> <p>See here for further details.</p>

<p>1 August</p>		<p>Effective date of UCITS Directive and AIFMD provisions for the governance and management of sustainability risks and adverse sustainability impacts.</p>	<p>Advance compliance preparations including any necessary updates to investment due diligence, risk management, conflicts of interest and resourcing arrangements for the management of sustainability risk.</p> <p>See here for further details.</p>
<p>2 August</p>		<p>Effective date of MiFID organisational requirements and operating conditions for the integration of sustainability factors, risks and preferences including the amended MiFID client suitability assessment rules.</p>	<p>In-scope fund managers to advance compliance preparations for sustainability risk management rules and update client suitability assessment processes and procedures to reflect new sustainability preference rules.</p> <p>See here and here for further details.</p>
<p>8 August</p>		<p>Corporate Sustainability Reporting Directive (CSRD) sustainability reporting standards consultation closed for comment.</p>	<p>'Large' and/or listed funds and fund management companies to advance preparations for compliance with CSRD reporting standards expected to be in place from January 2024, for f/y 2023.</p> <p>See here for further details.</p>
<p>1 September</p>		<p>Last phase of applicants (covered entities with an aggregate average notional amount of non-centrally cleared derivatives greater than €8 billion) subject to the initial margin requirements under EMIR.</p>	<p>This marks the end of the phase-in for initial margin requirements under EMIR. In-scope funds must exchange, on a bilateral basis, initial margin with a threshold not to exceed €50 million and a de-minimis minimum transfer amount not to exceed €500,000.</p> <p>See here for further details.</p>

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