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The Market & Regulatory Digest provides a scan of global regulatory changes and market developments from the past quarter.

The Americas

• The Ontario Securities Commission (OSC) <u>has analyzed</u> the impact of the move to a T+1 settlement window found no significant change in the proportion of securities with failed trades or the proportion of total traded value that failed to settle on time.

The Canadian Securities Administrators (CSA) are adopting in final form the amendments to National Instrument 94-101 *Mandatory Central Counterparty Clearing of Derivatives*. Pending necessary ministerial approvals, the amendments are set to come into force on March 25, 2026, in all CSA jurisdictions. The CSA also <u>put forward a notice and request for comment</u> on a proposed new harmonized multilateral instrument to support capital raising for Canadian businesses and investment opportunities for eligible investors within participating jurisdictions. The CSA also <u>extended</u> the comment period for the exchange-traded fund (ETF) regulatory framework to October 31, 2025.

The CSA is also proposing a multi-year pilot to allow eligible venture issuers to

voluntarily adopt semi-annual financial reporting. The pilot would provide an exemption for certain venture issuers listed on the TSX

Venture Exchange Inc. or the CNSX Markets Inc. from the requirement to file Q1 and Q3 financial reports. Consultation period ends

HIGHLIGHTS

- OSC impact analysis reveals T+1 implementation had minimal market disruption
- CSA amends National Instrument 94-101 Mandatory Central Counterparty Clearing of Derivatives
- ESMA updates taxonomy for the European Single Electronic Reporting
- Clearstream submits request to become an alternative CSD
- HKMA launches Cross-Boundary Bond Repurchase Business
- SFC proposes an investor identification regime at trading level for the exchange-traded derivatives market

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The Canadian Securities Exchange (CSE) proposed a mechanism addressing existing inefficiencies in the Canadian trading landscape

- The Canadian Securities Exchange (CSE) proposed a mechanism addressing existing ineπiciencies in the Canadian trading landscape related to odd-lot liquidity provisions outside of standard trading hours. The proposed order type offers dealers a streamlined, automated method to support odd-lot execution during these underserved timeframes. Comments are requested by November 24, 2025, and implementation is expected in Q2 2026.
- The Canadian Investment Regulatory Organization (CIRO) proposed revisions to the Investment Dealer and Partially Consolidated (IDPC) Rules amendments relating to fully paid securities lending and financing arrangements. Further to the IDPC Rule revisions, CIRO has also made consequential and clarifying changes to the Draft FPL Guidance and the FPL securities eligibility criteria. Consultation period ends November 16, 2025.
- The British Columbia Securities Commission (BCSC) proposed amendments to <u>BC Instrument 22-502 Registration</u> by the Investment Industry Regulatory Organization of Canada to delegate additional registration functions to CIRO. CIRO currently performs certain registration functions for the BCSC with respect to investment dealers and related individual registration categories. The amendments authorize CIRO to perform the same registration functions with respect to mutual fund dealers and related individual registration categories. Consultation period ends December 15, 2025.
- The U.S. Securities and Exchange Commission (SEC) has analyzed the importance of trustworthy custodians in the crypto asset market, highlighting the need for effective regulation to protect investors and facilitate the growth of the industry; the SEC also announced a cross-agency initiative to coordinate efforts enabling the trading of certain spot crypto asset products. The SEC also continues efforts to assist market participants during implementation of Treasury Clearing Rules

EMEA updates

• European Union: The European Union has published a couple of regulations related to the markets in crypto assets regime: the Commission Delegated Regulation (EU) 2025/1125, supplementing MiCAR with regard to regulatory technical standards specifying the information in an application for authorization to offer asset-referenced tokens to the public or to seek their admission to trading; and Commission Implementing Regulation (EU) 2025/1126, laying down implementing technical standards for the application of MiCAR. The European Union also issued technical information for calculating technical provisions and basic own funds regarding the Commission Implementing Regulation (EU) 2025/1794.

The European Securities and Markets Authority (ESMA) published an amendment to the European Single Electronic Format Regulatory Technical Standard to include the 2025 update of the IFRS taxonomy. These standards are currently undergoing the EU endorsement process, expected to be finalized in early 2026. What's more, ESMA along with the European Banking Authority (EBA) and the European Insurance and Occupational Pensions Authority (EIOPA) jointly published the fourth annual report on the extent of voluntary disclosure of principal adverse impacts under the Sustainable Finance Disclosure Regulation. ESMA also proposed key reforms to settlement discipline, supporting the transition to T+1. The changes aim to enhance settlement efficiency across the EU, facilitate the transition to a shorter settlement cycle by October 11, 2027, and reduce the administrative burden on central securities depositories (CSDs) and market participants. Finally, ESMA published its final report on standards under the ESG Ratings Regulation, covering authorization/recognition, separation of activities and disclosures. The technical standards are set to apply from July 2, 2026.

Deutsche Börse Group and **Circle** <u>have announced a collaboration</u> to advance stablecoin adoption in Europe, aiming to deliver solutions for market participants through the deployment of Circle's EURC and USDC stablecoins via Deutsche Börse Group's infrastructure.

• United Kingdom: The Prudential Regulation Authority (PRA) compiled a set of discrete proposals to address newly identified inconsistencies across various areas of Solvency UK reforms in relation to third-country branches, further streamline the policy framework, and clarify the expectations for branches. The consultation period ends December 16, 2025. The PRA also put forward proposals to delete certain regulatory reporting requirements for banks, including an initial set of targeted deletions of whole reporting templates as a first deliverable.

The Financial Conduct Authority (FCA) consults on <u>progressing fund tokenization</u>, including the introduction of a new model for direct dealing in funds and a roadmap to advance it and address key barriers. The FCA's proposed rules and guidance aim to support innovation and growth while maintaining high standards of consumer protection and market integrity. Comment period ends on November 21, 2025.

- The Netherlands, Belgium and France: Clearstream Europe AG (CEU) informed clients that it <u>submitted an official request</u> to the Euronext markets in Paris, Amsterdam and Brussels to allow CEU to become an alternative CSD for the settlement of trades executed on these markets.
- Saudi Arabia: The Capital Market Authority has announced a public consultation on a draft proposal to open the Main Market to all categories of non-resident foreign investors, allowing them to directly invest in the market without qualification requirements, with a consultation period ending on October 31, 2025.
- **Zambia:** The Bank of Zambia <u>announced an increase in the withholding tax rate</u> on government securities in Zambia, effective immediately, with the Bank of Zambia raising the rate to 20% (from 15%).
- **Nigeria:** The Securities and Exchange Commission in Nigeria <u>announced the transition from a T+3 to a T+2 settlement cycle</u>, effective November 28, 2025, enabling securities and funds to be settled within two business days after a transaction is executed. Nigeria's Federal Inland Revenue Service also released a public notice highlighting tax withholding obligations in relation to short-term securities.
- **Kenya:** The Kenya Parliament <u>approved</u> the Virtual Assets Service Providers (VASP) Bill 2025, whose main object is to provide for the legislative framework to license and regulate the activities of virtual asset service providers in and from Kenya.
- West Africa: The AMF-UMOA <u>commenced the migration</u> from omnibus to segregated account at the CSD level with a one-year transition period. Full compliance from all custodians and CSDs is expected by September 6, 2026.
- **Bulgaria:** The Council of the European Union <u>approved Bulgaria's adoption of the Euro as its official currency</u> and determined a Bulgarian lev conversion rate of 1.95583 per euro. Bulgaria is set to join the Euro Area on January 1, 2026.
- Russia: RBC's Russia market offering remains suspended. The EU Commission proposed the 19th package of sanctions against
 Russia in September, but its adoption by member states has been delayed indefinitely. <u>Updates to Canada's policies</u> have resulted in
 additional sanctions on Russia under its Special Economic Measures (Russia) Regulations, following the G7 Summit in June 2025.

APAC updates

- Hong Kong: The Hong Kong Monetary Authority (HKMA), People's Bank of China (PBC), China Securities Regulatory Commission and State Administration of Foreign Exchange jointly launched a new cross-boundary bond repurchase business. Updates to existing policies allow overseas institutional investors to participate in onshore repo business and use the obtained RMB liquidity for offshore purposes. And in another announcement, the PBC will now issue Renminbi Bills through the Central Moneymarkets Unit of the HKMA.
 - The Securities and Futures Commission (SFC) is consulting on the proposed investor identification regime for the exchange-traded derivatives market (HKIDR-DM) to further bolster the integrity and sustainable development of Hong Kong's capital markets. Consultation ends December 22, 2025.
- China: China Bond issued a notice to optimize account services for overseas institutional investors in the China interbank bond market, effective September 15, 2025. The PBC outlines the requirements for account opening, including the use of specific application forms, and establishes a three-month transitional period for the updated forms. China Bond also announced the launch of the centralized bond lending business, aimed at enhancing market liquidity and improving settlement service efficiency in the interbank bond market.
 - The Shanghai Futures Exchange (SHFE) expanded the investment scope of qualified foreign investors (QFI) in commodity futures and options, allowing them to invest in bitumen futures contracts and fuel oil, bitumen and woodpulp options contracts and aiming to increase market accessibility and diversity for foreign investors.
 - The Dalian Commodity Exchange (DCE) issued notice on expanding the investment scope of Qualified Foreign Investors in commodity futures and options, effective from October 28, 2025.
- Australia: The Australian Government released an exposure draft of legislation to regulate digital asset platforms, aiming to support innovation and enhance consumer safety in the Australian market. What's more, ASX has published amendments to the ASX Settlement Operating Rules, removing requirements for registering as a Securities Lending Participant and reporting certain securities lending activity, effective September 22, 2025.
- India: The Securities and Exchange Board of India (SEBI) proposed amendments to the Master Circular for Foreign Portfolio Investors (FPI), Designated Depository Participants and Eligible Foreign Investors to simplify regulatory requirements for FPIs investing only in government Securities. Additionally, following a review SEBI modifies the Block Deal Framework. The framework aims to restrict block deals to large institutional trades and curbs speculative activity. The changes are intended to increase market integrity, and transparency. SEBI has also notified issuance of Standard Operating Procedures for offshore derivative instruments by foreign portfolio investors.
- Thailand: The Bank of Thailand issued a circular, granting daily end-of-day limit relaxation for non-residents (NRs) holding Thai Baht (THB) balances in Non-resident Baht Accounts for Securities, allowing them to temporarily maintain THB balances exceeding the THB 200 million end-of-day limit. The effective date of this relaxation is December 1, 2025, subject to certain conditions. (Thai-only source)
 - The Fiscal Policy Office (FPO), the Securities and Exchange Commission (SEC), the Stock Exchange of Thailand (SET) and the Federation of Thai Capital Market Organizations (FETCO) have jointly announced the launch of the Thai Capital Market Attractiveness Initiative. The initiative drives ESG performance disclosure in accordance with ISSB standard, strengthen corporate governance of listed firms and law enforcement and facilitate foreign investors' more convenient use of e-proxy voting rights.
- Philippines: The Republic of the Philippines Bureau of the Treasury announced the placement of Philippine Peso-denominated government bonds on Index Watch-Positive for potential inclusion in the J.P. Morgan Government Bond Index-Emerging Markets series.
- Indonesia: The Indonesia Clearing and Guarantee Corporation (KPEI) and Bank Indonesia launched the Triparty Agent Repo facility to support the strategic initiative of 2030 Blueprint for strengthening money and foreign exchange markets, as well as expected to improve the efficiency of post-trade processing for existing transactions.
- Vietnam: The SSC published a resolution on piloting the crypto asset market in Vietnam, which took effect on September 9, 2025, and will be implemented for a period of five years. The SSC also released a decree to amend and supplement several articles of Decree No. 155/2020/ND-CP, aiming to attract foreign investment and create resources for the country's economic development by expanding opportunities for foreign investors to access the country's securities market.
 - FTSE Russell announced that Vietnam is to be reclassified from Frontier to Secondary Emerging market status, effective from September 21, 2026.

Views from the industry

- At the **Network Forum Americas** in New York (October 2025), discussions focused on lessons from T+1 settlement in the United States, the readiness of markets of digital assets/tokenization and priorities in **Latin America**. With 84% of institutional investors ready to increase Latam exposure, 59% do not based on market issues or barrier to entry. Regional priorities include T+1 adoption, asset servicing automation and digital assets, with **Brazil**, **Mexico** and **Argentina** ranking in the global top 10 for crypto adoption. Meanwhile, NUAM is advancing integration of **Colombia**, **Peru** and **Chile's** capital markets into a unified trading and clearing system.
- At PostTrade 360° in Stockholm (September 2025), focus centred on the European Commission's Savings and Investment Union (SIU), a strategic initiative aimed at enhancing financial opportunities to improve the efficiency of the European market infrastructure. The initiative looks to remove fragmentation by creating asset classes, improving growth opportunities and competitiveness. Panelists emphasized that harmonization in vital to reducing barriers, enabling smoother cross-border activity and preparing Europe's market infrastructure for the next evolution of capital markets. Europe is considered fragmented due to 27 single markets, and the SIU is looking at CSDs and the entire European community to be interconnected across markets. Euroclear emphasizes its commitment to becoming the preferred CSD in the Nordics. Euroclear says its Nordic strategy is not just a technical upgrade but a strategic leap toward harmonization, scale and purpose.

There was also discussion on the EU, the UK and Switzerland's readiness around T+1, with the consensus that Europe needs to be more dynamic and competitive globally, with T+1 being a welcome initiative. But the shift to a T+1 cycle is more complex and costly given the backdrop of a fragmented region with 27 markets, diverse market practices and numerous financial market infrastructures.

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