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Bulgaria joins euro area

Bulgaria has [adopted](#) the euro and joined the euro area.

The euro will gradually replace the lev as Bulgaria's currency and the lev will be exchanged at a conversion rate of 1.95583 lev per EUR 1. The two currencies will be used alongside each other for a period of one month to allow for a progressive withdrawal of the lev from circulation.

European Green Bonds: RTS and ITS on external reviewers published in Official Journal

The following Level 2 measures under the European Green Bonds Regulation (EU) 2023/2631 have been published in the Official Journal:

- [Commission Delegated Regulation \(EU\) 2025/2180](#) setting out regulatory technical standards (RTS) on the conditions for the registration of external reviewers, the criteria for assessing the sound and prudent management of external reviewers, the appropriateness of the knowledge, experience and training of the external reviewers' employees, and the conditions under which external reviewers can outsource their assessment activities; and
- [Commission Implementing Regulation \(EU\) 2025/2179](#) setting out implementing technical standards (ITS) on the standard forms, templates, and procedures for the provision of the information for an application for registration as an external reviewer for European Green Bonds.

Both regulations will enter into force on 19 January 2026.

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EBA updates guidelines on equivalence of third-country confidentiality regimes

The European Banking Authority (EBA) has updated its [guidelines](#) on the equivalence of confidentiality and professional secrecy regimes in third countries. The revised guidelines expand the scope of the 2022 guidelines to reflect new requirements under the Markets in Cryptoassets Regulation (MiCA) and incorporate the latest EBA equivalence assessments. The updated framework confirms that the confidentiality and professional secrecy regimes of several authorities, including those in Australia, China, Montenegro, Peru, Serbia and the UK, are now considered equivalent to EU standards. In addition, the revised guidelines streamline definitions, update legal references, and clarify how competent authorities should apply the framework when sharing information or engaging in supervisory cooperation.

China issues notices on supporting overseas institutional investors to conduct exchange-traded bond repurchase transactions

The [Shanghai Stock Exchange \(SSE\)](#) and [Shenzhen Stock Exchange \(SZSE\)](#) have each issued a joint notice with the China Securities Depository and Clearing Corporation Limited (CSDC) on supporting overseas institutional investors (OIs) to conduct exchange-traded bond repurchase transactions. This implements Announcement [2025] No. 21 issued by the People's Bank of China, the China Securities Regulatory Commission, and State Administration of Foreign Exchange and is intended to further open China's bond market.

Amongst other things, the notices address the following:

- qualification and scope of bond repo transactions – OIs that meet the requirements under the Announcement and cash bond trading rules of the exchange relevant may conduct exchange-traded bond repurchase transactions. The scope of bond repurchase transactions includes bilateral pledged repos, tripartite pledged repos, and standard pledged repo transactions (as reverse repo party), which will be subject to adjustment by the relevant exchange or CSDC from time to time;
- account opening, registration and settlement arrangements – these will be handled under the existing business rules of the relevant exchange or CSDC, as appropriate. OIs will need to enter into relevant entrustment agreements, master agreements on bond repurchase transactions and complete the investor suitability filing as preparatory steps;
- appointment of Chinese onshore securities firms – OIs are required to appoint an onshore securities firm that is an exchange member to execute repo transactions on exchange as trading participants and/or settlement participants;
- responsibilities of trading participant and settlement participants – in addition to providing trading or settlement services, trading participants (i.e., the appointed onshore broker) and settlement participants appointed by OIs will take a 'quasi-supervision' role and report to the relevant exchange or CSDC respectively if there is any potential violation or settlement risk; and
- regulatory supervision – the relevant exchange and CSDC will monitor the trading, registration, and settlement activities of OIs and their appointed trading and settlement participants. The relevant conduct will be subject to

self-regulatory rules and may be escalated to the CSRC for investigation and enforcement in severe cases.

Both notices took effect immediately upon issuance on 19 December 2025.

SFC issues circular on exemption from margin requirements for non-centrally cleared equity options

The Securities and Futures Commission (SFC) has issued a [circular](#) to inform licensed corporations that it will exempt non-centrally cleared single-stock options, equity basket options and equity index options (collectively, 'non-centrally cleared equity options') from its margin requirements from 4 January 2026 until further notice, to align with the latest global developments.

The SFC's decision, which is intended to prevent regulatory arbitrage and acknowledges the currently insignificant exposures of licensed corporations to non-centrally cleared equity options, aligns its approach with recent regulatory developments in the European Union and the United Kingdom. In particular:

- in the EU, a permanent exemption from the requirement to exchange margin for single-stock equity options and equity index options became effective on 24 December 2024, subject to monitoring and periodic reporting; and
- on 27 November 2025, the UK's Prudential Regulation Authority and Financial Conduct Authority published a joint policy statement containing amendments to the Binding Technical Standards 2016/22514. The amendments implemented an indefinite exemption from the UK bilateral margining requirements for single-stock equity options and index options.

The SFC has indicated that paragraph 7(e) of Part III of Schedule 10 to the Code of Conduct for Persons Licensed by or Registered with the SFC will be amended to reflect the exemption and gazetted in due course.

MAS consults on updates to guidelines on liquidity risk management practices for fund management companies

The Monetary Authority of Singapore (MAS) has launched a [consultation](#) on updates to its guidelines on liquidity risk management (LRM) practices for fund management companies (FMCs), which are intended to align the guidelines with the International Organization of Securities Commissions (IOSCO)'s final report on revised recommendations for liquidity risk management for collective investment schemes, published in May 2025, and the Financial Stability Board (FSB)'s final report on liquidity preparedness for margin and collateral calls, published in December 2024.

The proposed changes include:

- removing exchange-traded funds from the scope of the LRM guidelines;
- ensuring alignment between redemption terms and liquidity of fund assets of open-ended collective investment schemes (CIS) established in Singapore and authorised by the MAS (open-ended CIS);
- adopting a diversified approach to liquidity management. FMCs should consider anti-dilution liquidity management tools (ADTs), in addition to quantitative-based tools (such as suspension or gating) – an FMC managing open-ended CIS, particularly those that invest mainly in less liquid assets, must implement at least one ADT;

- incorporating explicit and implicit costs, including market impact of asset sales, into redemption costs to safeguard investors' interests especially during times of market stress;
- strengthening governance and enhancing disclosures on the design and use of liquidity management tools; and
- requiring a holistic assessment of liquidity risks, obliging an FMC to consider all potential sources of liquidity risks applicable to the CIS (such as margin calls during adverse market movements or settlement and operational delays in converting assets to cash) and incorporate the assessment of such risks in their liquidity risk management.

The MAS also proposes to update the Code on Collective Investment Schemes (CIS Code) to strengthen portfolio liquidity in money market funds by introducing expectations on eligible deposits that are placed with financial institutions.

The proposed updates to the LRM guidelines and CIS Code are intended to take effect six months after the publication of the revised LRM guidelines. The MAS notes that some FMCs have already adopted these updated practices and requirements, and encourages other FMCs to commence preparations as early as possible.

Comments on the consultation are due by 28 February 2026.

Recent Clifford Chance briefings

FPI insiders will be subject to US ownership and transaction reporting

Directors and officers of US-listed foreign private issuers (FPIs) will soon become subject to US ownership and transaction reporting requirements. From 18 March 2026, these individuals must comply with the same ownership and transaction reporting obligations as insiders of other US-listed companies. The imposition of these reporting obligations is the result of the enactment of the Holding Foreign Insiders Accountable Act (HFIAA), which partially invalidates a decades-old exemption for FPI insiders.

The HFIAA will require these FPI insiders to electronically file with the Securities and Exchange Commission (SEC) a Form 3 to provide an initial report of beneficial ownership of the relevant company's equity securities. Subsequently, they will be required to electronically file with the SEC reports on Form 4 to disclose beneficial ownership changes within two business days of a change. In addition, they may be required to report certain beneficial ownership information annually on Form 5 within 45 days after fiscal year end. These reports will be publicly available via the SEC's EDGAR system.

This briefing paper discusses the changes.

<https://www.cliffordchance.com/briefings/2025/12/fpi-insiders-will-be-subject-to-us-ownership-and-transaction-rep.html>

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