



EFAMA

European Fund and Asset Management Association

50 1974
years
2024

ANNUAL REVIEW

JUNE 2023 - JUNE 2024



ABOUT EFAMA

EFAMA is the voice of the European investment management industry, whose members manage approximately EUR 30 trillion of assets. We promote the interests of our members to develop a regulatory environment that supports the growth of the European market for asset management and investment funds. A key part of EFAMA's mission is to educate stakeholders on the industry's crucial role in steering capital towards investments that support a sustainable future and provide long-term value for investors.



50 YEARS OF SERVING THE INDUSTRY



Our journey began on 30 April 1974 with our first General Assembly, held in Frankfurt, under the name of the European Federation of Investment Funds and Companies (FEFSI). There, industry leaders laid the foundations for a strong, united asset management industry in Europe. **Founding members included the associations of Belgium, France, Germany, Denmark, Ireland, Italy, the Netherlands and the UK.** The European Fund and Asset Management Association (EFAMA) in its current form was born in 2004, which is also when we started welcoming corporate and associate members.

Standing on the shoulders of those visionaries, we have come a long way since that first meeting but our commitment to serving our members and achieving our goals has never been stronger. Before we dive into the current work, let's take a moment to honor our heritage.

Thank you to our previous Director Generals, for their hard work and vision.

- Steffen Matthias (1990-2008)
- Peter De Proft (2008-2018)



EFAMA has benefited greatly from the leadership and guidance of our past Presidents:

2021-2023 Naïm Abou-Jaoudé

2019-2021 Nicolas Calcoen

2017-2019 William Nott

2015-2017 Alexander Schindler

2013-2015 Christian Dargnat

2011-2013 Claude Kremer

2009-2011 Jean-Baptiste de Franssu

2007-2009 Mathias Bauer

2005-2007 Stefan Bichsel

2002-2005 Wolfgang Mansfeld

2001-2002 Kajsa Lindståhl

1999-2001 Alain Leclair

1998-1999 Georg Festetics

1997-1998 Julian Tregoning

1996-1997 Mariano Rabadan

1994-1996 Patrick Zurstrassen

1993-1994 Marc Bayot

1991-1993 Peter Hemme

1991 Kai Preskou

1989-1991 Giorgio Forti

1987-1989 Ernst Bracker

1985-1987 Tanneguy de Feuilhade de Chauvin

1983-1985 Mark St. Giles

1981-1983 Marc Bayot

1979-1981 Ernst Bracker

1977-1979 Louis Beaupère

1974-1977 Norman Miller

The EFAMA Secretariat contains many long-serving and deeply experienced professionals who have committed a major part of their career to serving the asset management sector. We are proud to boast a collective **150 years of total EFAMA experience** in-house.

A special round of applause for the following individuals:

Miriam Brunson – 30 years of service

Bernard Delbecque – 24 years of service

Isabelle van Acker – 16 years of service

Vincent Ingham – 15 years of service

Andreas Stepnitzka – 11 years of service

Federico Cupelli – 10 years of service



THANK YOU

TO EVERYONE WHO MAKES EFAMA AN EFFECTIVE VOICE FOR THE ASSET MANAGEMENT INDUSTRY

EFAMA IN NUMBERS



Founded in

1974

29

Number of National Associations / Countries



Number of Corporate Members

55

24

Number of Associate Members



Number of Staff

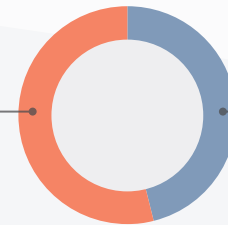
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67,000

total funds at end Q4 2023

36,000
UCITS

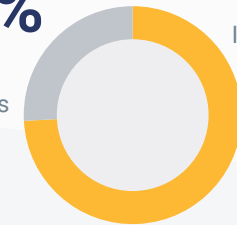


31,000
AIFs



30%

Retail investors



70%

Institutional investors



Asset under management est. at end Q4 2023

30

EUR trillions



UCITS and AIF net assets at end Q4 2023

20.7

EUR trillions



Asset management companies

4,500+

Direct jobs

123,000

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01 FOREWORD by the President



SANDRO PIERRI
EFAMA President

This time last year, I was honoured to be elected as President of EFAMA. Over the last twelve months, I have benefitted from many informative and enriching conversations with our members, policymakers and other stakeholders, which have all left me with the impression that **EFAMA's work is all about joining the dots**. Bringing diverse views from across Europe together to form cohesive opinions on key regulatory topics. Bringing industry experts and policymakers together to create better regulation. Bringing stakeholders from across the value chain together on common issues, to amplify our voice. As we celebrate EFAMA's 50th anniversary this year, we must acknowledge the important impact this work has had on the asset management sector over the decades.

Our industry has weathered a series of crises in recent times, including Covid-19, the war in Ukraine, fast-rising interest rates and increased geopolitical tensions. We are also facing numerous simultaneous transitions, including digital disruption, sustainable transition and demographic changes, and the financing challenges associated with these. We are an **industry responsible for managing around 30 trillion of assets** on behalf of our retail and institutional clients and have proven our resilience despite an incredibly challenging business environment. However, there is much that still needs to be done if we want vibrant and diverse European capital markets that benefit EU economies and citizens.

Most of the world's citizens are electing new leadership this year, including the EU, which will significantly impact policymaking for years to come. The publication of Enrico Letta's report on the future of the Single Market, the Eurogroup statement on the future of CMU, and the upcoming report of Mario

Draghi, all put increasing emphasis on EU competitiveness and the urgent need to make progress towards achieving a well-functioning Capital Markets Union to finance Europe's necessary transitions. EFAMA has contributed to the public debate through many meetings with these stakeholders and the **publication of our policy priorities for the next 5 years**, built together with our members' input. In it, we make numerous recommendations to boost competitiveness, increase retail participation in capital markets, unlock the full potential of sustainable finance and further integrate Europe's capital markets.

We have seen a lot of regulatory progress over the last 12 months in the lead up to the EU elections. After years of advocacy, the revision of the **AIFM/UCITS Directives** was finalised, including broader and more harmonised liquidity management tools, specific rules on loan origination, and a delegation framework left largely intact. Many debates were had on the **new ELTIF regime**, as ESMA and the European Commission have been working on technical standards covering important elements like redemption policies. Getting these technical details right is critical to the success of this new investment vehicle, which has the potential to broaden retail access to private assets and help finance the sustainable transition.

Following intense engagement and very political debates, the finalization of the MiFIR/MiFID review established promising rules for **European consolidated tapes** and changes to EMIR will introduce an **EU active account requirement for clearing**. Following detailed explanations to policymakers and joint efforts with other trade associations, the final **Corporate Sustainability Due Diligence Directive** excluded the investor-investee relationship from its scope. We were also pleased with the adoption of a new **ESG ratings regulation**, which should improve transparency of data sources and methodology and limit potential conflicts of interest.

01 FOREWORD by the President

Speaking of sustainable finance regulation, we have stressed that the ongoing review of **SFDR** is a good opportunity to become more investor-centric and increase alignment with existing and upcoming rules, including MiFID/IDD and the Corporate Sustainability Reporting Directive. As a member of EFRAG, EFAMA actively participated in the development of the first set of **European Sustainability Reporting Standards** and will be involved with the future ones. Supervisors worked a lot on greenwashing, including a final report from the ESA's and the publication of **ESMA guidelines on fund names**. EFAMA has continuously advocated for consistency, clarity and a coordinated approach across sustainable finance regulations.

When it comes to encouraging retail participation in capital markets, EFAMA established itself as a key interlocutor in discussions with the European Parliament and Council on the **Retail Investment Strategy**. Policymakers have acknowledged that the European Commission's original proposal did not meet the intended objectives and we have worked extensively on alternative proposals together with our members.

One positive development in further integrating Europe's capital markets was the finalization of the **Faster and Safer Tax Excess Refund (FASTER)** proposal, which aims to encourage more EU cross-border investments through harmonized tax procedures for withholding tax across EU countries, eliminating double taxation. EFAMA's extensive engagement with the Council resulted in rules that are better suited for the realities of investment fund managers.

With so many important policy topics under discussion, EFAMA has ensured that **the investment management industry in Europe has a strong voice** and is part of the debates happening in Brussels and elsewhere. I would like to thank the Vice-President, the EFAMA Board, the wider members, and last but certainly not least, the EFAMA staff for their tireless efforts and support in service to our industry.

I look forward to continuing this important work with you next year, as we see what the next legislative mandates bring us. I believe we are in a strong position to meet the challenges and seize the opportunities coming our way.

Sandro Pierri
President

02 INTRODUCTION by the Director General



TANGUY VAN DE WERVE
EFAMA Director General

Dear Member,

It is my pleasure to present this overview of our activities since our Ordinary General Meeting of last year. It has been an exceptionally busy 12 months at EFAMA and I hope this publication gives you a good sense of the scope of our work. As you may know, this year is a special one for us as we are celebrating EFAMA's 50th anniversary. A lot has changed over the last half a century but one thing that has not is the dedication of our members and Secretariat to the long-term well-being and success of our industry.

This report is structured around the main achievements of our nine committees (and related working groups/taskforces) and three platforms. The members participating in the work of these bodies assist us to develop strong, evidence-based, pan-European positions on the important regulatory discussions of the moment. We thank these members for their contribution and encourage you to let us know if you want to join a committee where your organisation is not yet represented.

While you can read about all our policy and advocacy work in the following pages, several developments are worth highlighting, including:

- The publication of our policy priorities for the next 5 years, which provide incoming policymakers with a roadmap for boosting EU competitiveness, increasing retail participation in capital markets, encouraging sustainable investments, and progressing towards a Capital Markets Union.
- Welcoming the Polish chamber of fund and asset managers as an EFAMA member, as well as three new corporate members and a new associate member.
- Our research work covering sustainable funds, ETFs, AIFs, the declining cost of UCITS, investment fund distribution channels, as well as enriched editions of EFAMA's two flagship publications, the Fact Book and the Asset Management Report.
- The publication of a comprehensive report on 'Household participation in capital markets', which was covered extensively by the media and often referred to in policy papers and discussions.
- Our work in the field of investor education with the publication of our brochure 'Sustainable investing explained in 9 questions', which was translated into various languages and distributed nationally by many of our members.
- Promotion of the new ELTIF regime, which we feel has great future potential, including the publication of a 'Frequently Asked Questions' brochure together with Arendt.
- Extensive engagement on financial stability at European and international level, including the publication of a detailed report entitled 'Open-ended funds and resilient capital markets' demonstrating that OEFs do not threaten financial stability and contribute to the diversity and resilience of capital markets.
- Building our capacity in the area of digitalisation by creating a new AI Taskforce at EFAMA and hiring an additional staff member to cover this topic.
- Beneficial cooperation with other trade associations, including a joint paper on boosting retail participation in capital markets, another successful edition of the European Retirement Week, and the publication of a joint CMU report entitled 'The Capital Flywheel'.
- Good public visibility and media coverage of the important policy topics EFAMA works on, including webcasts, interviews and press releases on inter alia SFDR, sustainability reporting, ESG ratings, ELTIF, retail investing, financial stability, AIFMD, withholding tax, T+1, consolidated tape and clearing.
- Our well-attended conferences, workshops and webinars on timely and relevant topics, including the EU elections, pensions, retail investing, sustainable reporting and clearing.

02 INTRODUCTION by the Director General

I am happy to report that member satisfaction remains high, as demonstrated by the results of the Standing Committee members' satisfaction survey from earlier this year. We will not rest in complacency however, and are busy developing a new three-year action plan to further improve the work we do and the services we provide to members.

I would like to thank the EFAMA staff for their commitment, professionalism, and for generally being a pleasure to work with. I would also like to thank Sandro Pierrri, Massimo Greco and our Board members for their service to the European asset management industry and their unwavering support of EFAMA, as well as all our Committee Chairs and vice-Chairs for their leadership and strong commitment. I look forward to continuing our work together, to engaging with the incoming policymakers, and to the year ahead.

Tanguy van de Werve

Director General

“ I am thankful to all the members who have actively engaged in our work over the decades and helped make EFAMA what it is today: the credible, representative and authoritative voice of the European investment management industry. ”

03

**WORK OF THE STANDING
COMMITTEES, PLATFORMS
& TASKFORCES**

COMMITTEE OVERVIEW



BOARD OF DIRECTORS

DCD

DISTRIBUTION & CLIENT DISCLOSURES SC

Andreas Stepnitzka – Kimon Argyropoulos
Carolina De Giorgi (until Oct 2023)

ECON

ECONOMICS & RESEARCH SC

Bernard Delbecque – Thomas Tilley

Taskforce: European Fund Classification
Taskforce: Fund Charges and Performance
Taskforce: Member Contributions

FUNDREG

FUND REGULATION, ASSET PROTECTION & SERVICE PROVIDERS SC

Federico Cupelli – Gwen Lehane
Elona Morina (until Nov 2023)

Taskforce: Exchange-Traded Funds
Taskforce: Money Market Funds
Taskforce: Benchmarks

MANCO

MANAGEMENT COMPANIES REGULATION & SERVICES SC

Zuzanna Bogusz

Taskforce: Anti-Money Laundering
Subgroup: Operational Resilience
Subgroup: Financial Data Access

PENSIONS

PENSIONS SC

Bernard Delbecque

ESG

STEWARDSHIP, MARKET INTEGRITY, ESG INVESTMENT SC

Anyve Arakelijan – Chiara Chiodo

Taskforce: Common Ownership
Workstream: SFDR & Taxonomy
Workstream: Stewardship & Corporate Sustainability
Workstream: Sustainable Data & Reporting

SUP

SUPERVISION & THIRD-COUNTRY DEVELOPMENTS SC

Marin Capelle

TAX

TAXATION & ACCOUNTING SC

António Frade Correia

Taskforce: VAT
Taskforce: Blockchain for Taxes
Taskforce: Accounting

TMR

TRADING, TRADE REPORTING & MARKET INFRASTRUCTURES SC

Susan Yavari

Taskforce: Trade and Transaction Reporting Standards
Taskforce: EMIR
Taskforce: T+1 Settlement

INVESTOR EDUCATION PLATFORM

Bernard Delbecque

PUBLIC POLICY PLATFORM

Vincent Ingham

DATA PLATFORM

Susan Yavari

A Distribution & Client Disclosures Standing Committee

The main focus of the Standing Committee's work was the Retail Investment Strategy, which has been debated extensively by the European Parliament and Council. EFAMA established itself as a key stakeholder for policymakers and collaborated extensively with other financial industry associations. In addition, the committee continued its work on PRIIPs implementation, including through the FinDatEx project where we play a major role.

Important debate on the Retail Investment Strategy

The DCD Standing Committee has invested significant time and expertise in its work on the Commission's Retail Investment Strategy (RIS). The RIS aims to encourage the participation of retail investors in EU capital markets and forms a key pillar of the Commission's efforts to strengthen the Capital Markets Union and improve the competitiveness of European markets. Since its publication, EFAMA has established itself as a key interlocutor in discussions with the European Parliament and Council. Shortly after the proposal's publication, EFAMA brought together the relevant technical experts from the European Commission for an exchange with the DCD Standing Committee's members. The committee developed [several position papers](#) highlighting the practical effectiveness and consequences of the proposals and raised concerns about the narrow focus on cost as a measure of value. In particular, EFAMA raised questions about the proposal's top-down value-for-money pan-European benchmarks, the best interest test which overlaps with the MiFID II suitability rules (including sustainability preferences), and the execution-only inducement ban which could limit access to digital platforms and increase upfront costs for investors. EFAMA also produced a [leaflet](#) outlining its vision for a framework benefitting retail investors, reflecting on the helpful and not-so-helpful proposals in the RIS.

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CAROLINA DE GIORGI (until 10/2023)
Regulatory Policy Advisor



CROSS-INDUSTRY DIALOGUE

EFAMA has continued to collaborate closely with other industry groups, particularly those in the European retail distribution landscape. The European Commission asked EFAMA, the European Banking Federation and Insurance Europe to participate in a cross-industry dialogue on the distribution of retail investment products. This included a roundtable hosted by the Commission in June last year, a year-long consultative process which resulted in the publication of a [joint industry paper](#), and a follow-up roundtable in April 2024.

Leading the way in the value-for-money debate

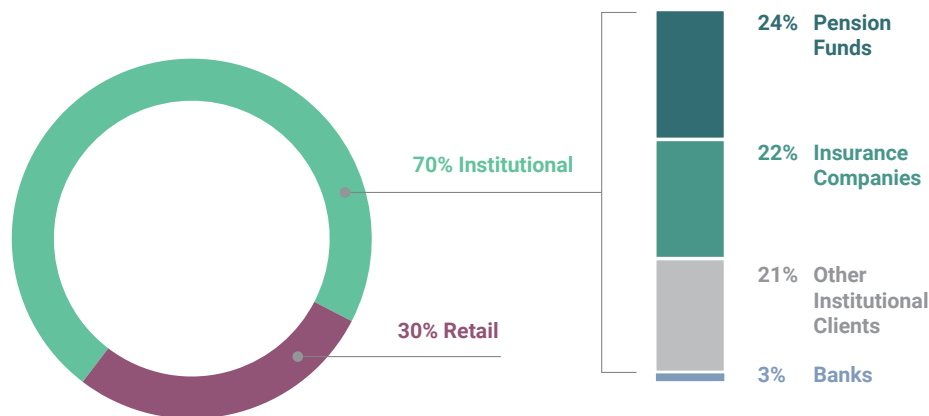
Value-for-money is one of the key pillars of the Retail Investment Strategy and has been at the forefront of the agenda. In essence, the Commission proposed a one-size-fits-all approach which reduced value to a cost equation. Products would be assessed against quantitative, supervisor-set benchmarks, which would ultimately reduce consumer choice and competition. Having published its initial counterproposal in February, EFAMA has been heavily involved in the discussions with co-legislators and the Commission. Drawing on its deep pool of product governance expertise, EFAMA has established itself as the go-to industry representative when it comes to value-for-money discussions. EFAMA's alternative to the Commission's value-for-money benchmarks in the form of peer group reviews is reflected in the Parliament's final position and, at the time of writing, also in the Council's text.

“The Commission’s proposal to introduce value-for-money benchmarks will add both complexity and cost. There’s a cheaper way to do it and we are happy to see that EFAMA’s proposal for enhanced transparency through internal peer reviews is finding traction with policymakers and member states. It shows the merits of constructive discussion.”

- Kåre Valgreen (Finance Denmark),
Committee Vice-Chair

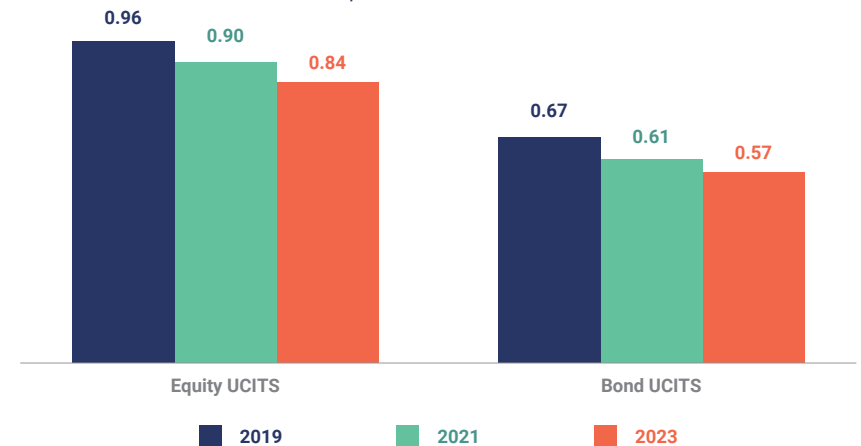
WHO ARE THE CLIENTS OF THE EUROPEAN ASSET MANAGEMENT INDUSTRY?

in percent of managed assets, at the end of 2022



HOW MUCH HAS THE COST OF UCITS DECLINED IN RECENT YEARS?

in percent of net assets



Implementation work ongoing for PRIIPs & FinDatEx

EFAMA has also continued its work to facilitate the implementation of existing legislative proposals. The [PRIIPs Expert Group](#) worked on outstanding queries from asset managers around PRIIPs disclosures and committed to updating its PRIIPs Q&As for members. The committee also worked closely with [FinDatEx](#) to keep existing data exchange templates, including the European MiFID Template (EMT), up-to-date in response to evolving regulations.

“ The Retail Investment Strategy has the potential to disrupt retail distribution in the European Union. The committee believes the Commission’s proposal does not sufficiently propose changes that would encourage retail investor participation in financial markets to its full potential. Investors need to retain affordable access to financial advice and the choice of varied distribution models if we want to encourage retail investing with confidence. We are pleased that the European Parliament has put the focus back on investor needs in their agreed position on the file. ”

- *Julia Backmann (Allianz Global Investors),
Chair of the Distribution & Client Disclosures Standing Committee*



JULIA BACKMANN
(ALLIANZ GLOBAL INVESTORS)
Chair of the Distribution & Client Disclosures
Standing Committee

KÅRE VALGREEN
(FINANCE DENMARK)
Committee Vice-Chair

B Economics & Research Standing Committee

The Economics and Research Standing Committee enriches EFAMA's research endeavours by offering insights and expertise from its members, which inform the content of reports on various pertinent issues.

The Committee was closely associated with the preparation of the 2024 Fact Book, the 2023 Asset Management Report and the Market Insights series.

- The [EFAMA Fact Book](#), published in June 2024, focussed on the main developments in the UCITS and AIF markets during the 2013-2023 period and featured "info boxes" on topics that are central to EFAMA's policy priorities. The Fact Book is accessible for free on the EFAMA website, accompanied by a printed brochure summarizing its key insights.
- The [EFAMA Asset Management Report](#), published in December 2023, provided an in-depth analysis of key trends in the European asset management industry, focussing on where investment funds and discretionary portfolio mandates are managed in Europe. Last year's report included a survey on the main opportunities and challenges for the industry, a contribution by McKinsey on the impact of generative AI in asset management, an analysis of Cerulli on investors' demand for private assets, and concrete examples of recent voting and engagement activities by asset managers.

Five new [EFAMA Markets Insights](#) were published in the last twelve months.

- The first one, entitled "[The SFDR fund market – State of play, latest market developments and outstanding regulatory issues](#)", shows fluctuations in the SFDR fund market, including at country level, and makes policy recommendations for the future.

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- The second one, entitled "[UCITS ETFs: A growing market in volatile times](#)", highlighted some of the main European ETF market trends and differences between ETFs and other exchange-traded products. It underlined the resilience of ETFs in times of market stress and explained why the introduction of a consolidated equities/ETF tape will help the European ETF market reach its full potential.
- The third one, entitled "[The AIF market – A review](#)", shed light on the alternative investment fund (AIF) market in Europe, comparing its recent evolution with that of UCITS and diving into country-level figures. Furthermore, it highlighted the important regulatory changes that will be implemented in the context of the AIMFD review.
- The fourth one, entitled "[The cost of UCITS available to retail investors – key determinants based on clean share classes](#)", shows that size, age, investment strategy and geography are key determinants of UCITS cost.
- The fifth one, entitled "[Investment Fund Distribution in Europe](#)", provided an analysis of how investment funds are distributed to retail investors across 19 European countries. Fund managers who participated in the survey also shared their perspectives on the expected changes in fund distribution over the next five years.

In addition, EFAMA published a new edition of its report "[Household Participation in Capital Markets](#)". It analyses progress made in recent years and includes policy recommendations on improving retail participation in capital markets.

One of the goals of EFAMA is to enhance the interaction between EFAMA members and academic researchers. To achieve this, three research workshops were organized over the last twelve months, on the following topics:

- The illusion of control: why financial crises happen, and what we can (and can't) do about it, by Professor Jon Danielsson (LSE).
- Climate change concerns and the performance of green versus brown stocks, by Professor Kris Boudt (UGent)
- Firm's profitability and ESG score: A machine learning approach, by Professor Rita Laura D'Ecclesia (Università di Roma Sapienza)



ALESSANDRO ROTA (ASSOGESTIONI)

Chair of the Economics &
Research Standing Committee

THOMAS VALLI (AFG)

Committee Vice-Chair

AGATHI PAFILI (CAPITAL GROUP)

Chair of the Funds Charges & Performance Taskforce

SERGE WEYLAND (ALFI)

Chair of the Member Associations' Contributions Taskforce

MIRANDA SEATH (THE IA)

Chair of the EFC Taskforce

Three Task Forces fall under the remit of the SC:

- **The Task Force on funds charges and performance** analysed the [ESMA Annual Report on the Costs and Performance](#) of EU Retail Investment Products and agreed on comments that were presented to ESMA.
- **The Task Force on Member Associations' contributions** reviewed the data used for calculating the 2024 contributions of member associations.
- **The European Fund Classification Task Force** continued to monitor the development and promotion of the [European Fund Classification \(EFC\)](#). After expanding the EFC coverage to include the French, UK, and Italian markets in 2023, over 100,000 additional ISINs are set to join the EFC classification in 2024. This expansion has reignited interest among potential new users of the classification system.

“Competitiveness and distribution are key issues for the asset management industry. In this context, the Committee provides an ideal platform where much fact-based evidence is gathered, discussed and then used to inform EFAMA's policy stance in its critical work to shape the future of the industry.”

- *Alessandro Rota (Assogestioni),
Chair of the Economics & Research Standing Committee*

C Fund Regulation, Asset Protection & Service Providers Standing Committee

Over the past twelve months, the work of the Standing Committee focused on the regulatory technical standards for the revised European Long-Term Investment Funds (ELTIF) Regulation and proposed revisions to the Benchmarks Regulation. In addition, early discussions took place on the upcoming European Commission review of the UCITS delegated directive on eligible assets.

ELTIF 2.0: ensuring the success of the new rules

The revised European Long-Term Investment Fund (ELTIF) Regulation entered into force on 9 April 2023 and became applicable from 10 January 2024. The revamped regime promises to become an attractive structure for long-term investments, permitting a broader scope of eligible assets, more flexible fund rules and improved access and safer conditions for retail investors. Since the publication of the European Commission's proposal in late 2021, the number of ELTIFs registered in Europe has almost doubled from 57 to over 100.

ESMA and the European Commission have been working on regulatory technical standards (RTS) to supplement the ELTIF Regulation, regarding redemption rights and liquidity management, the operation of the matching mechanism and rules for cost disclosures. Despite committee members' call for flexibility, ESMA's first draft RTS set out strict calculations regarding the minimum percentage of UCITS-eligible assets required for a fund to use certain notice periods. The Standing Committee provided [comprehensive feedback](#) on this draft, and the European Commission recognised the need for a more holistic assessment of fund liquidity and redemption terms in their detailed response to ESMA. The European Commission is currently reviewing a more workable draft RTS from ESMA and the final text is expected to be passed into law later in 2024 as a delegated act.

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Regulatory Policy Advisor



ELTIF 2.0 EDUCATION INITIATIVES

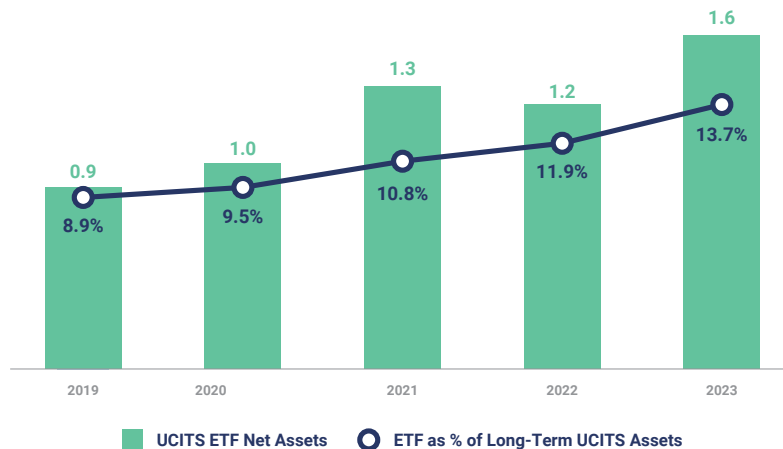
- EFAMA continued to promote awareness of the new product rules by publishing a Frequently Asked Questions (FAQs) document in collaboration with Arendt, accompanied by an infographic highlighting the most significant changes of the new regime.
- EFAMA Policy Advisor, Gwen Lehane, and committee Chair, Martin Parks, participated in an Ignites webcast on ELTIF 2.0 in April this year, which was well received.
- We are organising a fireside chat with Arendt on the implications of the new RTS for members in June this year.

Relooking at UCITS eligible assets

As part of the European Commission’s review of the UCITS delegated directive on eligible assets, ESMA released a Call for Evidence last month which seeks feedback on central terms like the notion and presumption of liquidity. ESMA will also be doing a comprehensive review of the merits of direct and indirect exposure of UCITS funds to a range of listed asset classes. The position of the Standing Committee has been that there is no compelling reason to conduct a review of the UCITS eligible assets regime, as the framework has proven to be effective and no significant scandals have been reported. For a well-functioning and popular brand like UCITS, care must be taken when considering any changes that may disrupt the status quo. EFAMA members will work together on a consultation response over the coming months.

HOW HAVE THE NET ASSETS OF ETF UCITS CHANGED OVER THE PAST 5 YEARS?

EUR trillions, percentage of long-term UCITS net assets



Recalibrating the Benchmarks Regulation

The European Commission published its proposal to revise the Benchmarks Regulation in October 2023. Most significantly, the draft Regulation removes administrators of ‘non-significant benchmarks’ from scope, with some exceptions relating to Paris-Aligned Benchmarks and Climate-Transition Benchmarks. Progress has moved rapidly on the file, with the Council and Parliament finalising their positions by December 2023 and April 2024 respectively. EFAMA’s [Benchmark Taskforce](#) issued a [position paper](#) stressing that fully exempting all non-significant benchmarks would lead to gaps in data reporting, notably under the SFDR and UCITS. This position was covered by many media publications, including an interview with Responsible Investor. Triologue negotiations are expected to commence in late 2024, following the Parliamentary election process.



STAKEHOLDER ENGAGEMENT

In February 2024, Benchmark Taskforce members had the opportunity to engage with Andreas Hoepner from the EU Platform on Sustainable Finance, who presented their report proposing voluntary Taxonomy-Aligned Benchmarks.

The focus of the **Money Market Funds (MMF) Taskforce** remained the review of the MMF Regulation. While a new initiative is not expected before end-2024 under a new European Commission mandate, the Taskforce has been advising policymakers on amendments affecting repo/reverse repo transactions and their respective existing regulatory limits as part of EMIR 3.0 reforms. The Taskforce also studied proposals from the UK FCA for its own domestic MMF review effort. This culminated in [EFAMA's response](#) to the consultation in March 2024 and bilateral discussions with UK authorities, where we expressed significant reservations with proposed enhancements to the existing liquidity ratios across all types of MMF structures and cautioned against departing from the EU MMF Regulation as this would jeopardise future equivalence recognition between the two regimes.

Lastly, the **ETF Taskforce** advised other EFAMA Standing Committees on index fund/ETF-specific matters related to large regulatory files, notably the implementation of the SFDR regime, the ESMA Guidelines on ESG fund naming, as well as the U.S. move to a shorter settlement cycle (T+1).

“ The revisions to ELTIF 2.0 have breathed new life into this product, which has the potential to channel capital into the European real economy while providing an option for informed retail investors to access private asset classes. We welcome the particular attention given by policymakers to carefully calibrating the Level 2 rules to ensure they support the spirit and purpose of the new regime while ensuring the product remains safe and attractive for investors. ”

- *Martin Parkes (BlackRock),
Fund Regulation Standing Committee Chair*



MARTIN PARKES (BLACKROCK)
Chair of the Fund Regulation, Asset Protection & Service
Providers Standing Committee

**ANTOINE DE LA GUÉRONNIÈRE
(BNP PARIBAS ASSET MANAGEMENT)**
Vice-Chair of the Fund Regulation, Asset Protection &
Service Providers Standing Committee

KESHAVA SHASTRY (DWS)
Chair of the ETF Taskforce
THIERRY DARMON (AMUNDI ASSET MANAGEMENT)
Chair of the MMF Taskforce
PIOTR GIEMZA-POPOWSK (ARENDDT)
Chair of the Benchmarks Taskforce

D Management Companies Regulation & Services Standing Committee

ZUZANNA BOGUSZ
Regulatory Policy Adviser
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The Standing Committee's work in the past year focused on four key areas: final discussions on the AIFMD & UCITS review, demonstrating the industry's resilience to systemic risks, the Anti Money Laundering (AML) Package and technical standards for the Digital Operational Resilience Act (DORA).

Demonstrating the resilience of the investment fund industry

For the best part of this decade, macro-prudential supervisors have argued that investment funds contribute to the build-up of systemic risks. With the help of committee members, coordinated by policy advisor Marin Capelle, EFAMA published a report entitled 'Open-ended funds and resilient capital markets', which demonstrated that the vast majority of OEFs do not threaten financial stability and contribute to the diversity and resilience of capital markets. The report also made a number of policy recommendations, which the committee built on in [our responses](#) to the FSB and IOSCO consultations on liquidity management in the fund sector. EFAMA undertook an extensive outreach exercise with these organisations and national central banks, including welcoming the IOSCO Chair and FSB Secretary General at our IMF conference. The FSB and IOSCO published their respective recommendations in December 2023, which recognised that asset managers should have flexibility to select the most suitable liquidity management tools for a given fund. In 2024, the main focus is on the European Commission's work on a macroprudential regime for asset management.

Final agreement on the AML package

Following intense discussions between the European Parliament and the Council, the new package of anti-money laundering (AML) rules was agreed in April 2024, including an AML Directive, an AML Regulation and Regulation establishing a new AML Authority which will be based in Frankfurt. These will rearrange how the EU responds to the threat of money laundering and terrorist financing and the [AML Task Force](#) pushed for a number of changes in priority areas for our industry. We were concerned with the proposal to lower the percentage threshold for identifying beneficial owners, new rules for undertakings in collective investments, and other overcomplications. EFAMA met with relevant MEPs and member states, and coordinated frequently with other financial sector associations. In the end, we were pleased to see the threshold for beneficial ownership interest maintained at 25%, as well as the general operability of the framework. One negative development is the new obligation for non-EU legal entities to register information about their beneficial owners in a member state register when entering business relationships with EU financial entities. Task force members believe this could have an impact on the competitiveness of the EU financial industry and will be monitoring this closely.

Final agreement on the AIFMD/UCITS review

After years of discussion, the review of the AIFMD & UCITS Directive was finalised in November 2023 and published in the Official Journal in March 2024. Committee members provided valuable feedback to the European Commission and co-legislators throughout the process. The new rules include the introduction of a wide list of liquidity management tools available to managers under both directives, specific rules on loan origination and supervisory reporting changes with new regular reporting established for UCITS. The area of delegation remained largely intact, with amendments focusing on the distinction between distributors acting on behalf of the fund manager or on their own behalf. In terms of next steps, Member States have until 16 April 2026 to transpose the new rules into national law and ESMA has a number of regulatory technical standards to propose.

Avoiding a 'one-size-fits-all' DORA

The **Operational Resilience Subgroup** has provided the European Supervisory Authorities (ESAs) with significant input on their proposed technical standards and guidelines supplementing DORA, [responding to most of the 10 draft papers](#). Our primary aim was to secure sufficient proportionality for asset managers, whose risk profile significantly differs from that of the banking sector. EFAMA also turned to the European Commission to highlight concerns around the broad scope of the soon-to-be-implemented register of ICT contractual arrangements. Additionally, the subgroup served as a platform for members to exchange on the implementation of particular obligations within the DORA framework.



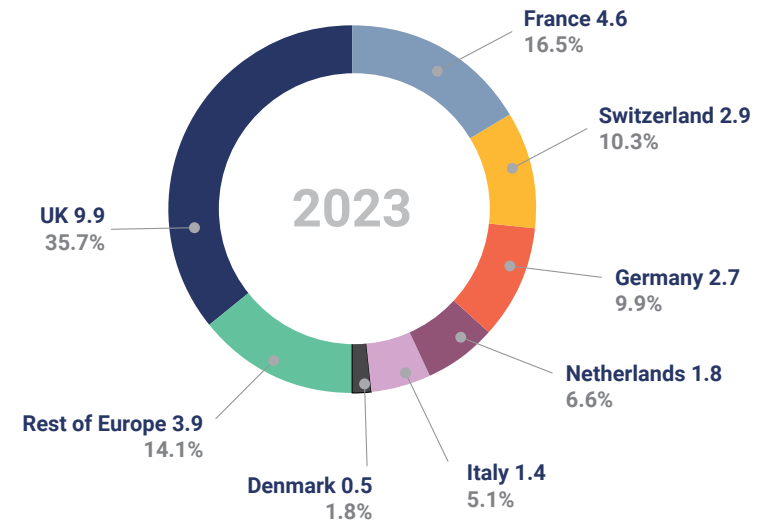
AIFMD INITIATIVES

A Market Insight was prepared together with the Economics & Research Standing Committee, presenting an overview of the market for alternative investment funds and how this could evolve following the recently agreed changes.

We interviewed Patricia Horsfall, Committee Chair and Executive Vice-President at Natixis Investment Managers, for a "3 questions 2" on the revised AIFMD and UCITS Directive rules.

WHERE ARE EUROPEAN ASSETS MANAGED?

EUR trillions, share in total AuM



Framework for Financial Data Access (FiDA)

As of January 2024, the committee members have been discussing the asset management industry's recommendations regarding the new financial data access proposal (FiDA) launched by the European Commission. The aim of FiDA is to allow customers' financial data to be shared with other service providers to promote data-driven financial services. Members are looking at this framework first and foremost from the clients' perspective and assessing data security. We expect to finalise EFAMA's position paper on FiDA in June and are closely monitoring discussions taking place both in the European Parliament and in the Council.

“ We are pleased with the outcome of the AIFMD & UCITS review, which remained targeted and kept key elements of these successful frameworks intact. As important details of the new rules are still to be decided by ESMA, our work continues with the aim to provide the authorities with valuable input and best expertise.”

- Patricia Horsfall (Natixis Asset Management),
Chair of the Management Companies Regulation &
Services Standing Committee

ENGAGING WITH THE EUROPEAN COMMISSION



In February 2024, committee members had the opportunity to engage with Vincent O'Sullivan from the Macroprudential Policy Unit at DG FISMA on their work on macro-prudential policy for the asset management sector.



PATRICIA HORSFALL
(NATIXIS ASSET MANAGEMENT)
Chair of the Management Companies Regulation &
Services Standing Committee

CAROLINA FERNÁNDEZ GONZÁLEZ (INVERCO)
Committee Vice-Chair

EVELYNE CHRISTIAENS (ALFI)
Chair of the AML Taskforce

E Pensions Standing Committee

BERNARD DELBECQUE
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Over the last twelve months, the Standing Committee continued its more strategic focus on the future of EU and national European pensions systems, including proposing an extension of the OECD study on defined contribution pensions, supporting an EFAMA high-level event during the European Retirement Week, and working on proposals to influence the work on the incoming European Commission in the area of pensions.

OECD study on defined contribution pensions

In 2022, EFAMA commissioned a study by the OECD entitled “The Contribution of Capital Markets to Good Outcomes for Members of DC Pension Plans”. The first part of the study analysed the performance of different investment strategies using historical data on investment returns and looked at real-life examples of DC schemes. In October 2023, the EFAMA Board approved the Committee’s proposal to extend the OECD project with a forward-looking stochastic analysis to look at retirement outcomes for different investment strategies and determine appropriate default strategies for different policy objectives. The results will feed into the OECD’s work developing guidelines on good design for DC pension plans. We hope this analysis will demonstrate again the importance of risk assets for pension investment, which should in turn reinforce wider EFAMA messages about the role investment managers can play in supporting pension savers and channelling productive finance to the wider economy.

CROSS-INDUSTRY POLICY RECOMMENDATIONS

As part of Retirement Week, the participating associations compiled a [list of recommendations](#) for strengthening future pension adequacy within the 2024–2029 EU policy agenda. These were debated with the high-level speakers at the launch event.



European Retirement Week

The [European Retirement Week](#) (ERW), which was launched in 2021 at the initiative of EFAMA, aims to raise awareness of the urgent need to address the increasing retirement savings gap and provides stakeholders and policymakers with a platform to discuss possible solutions to the pension challenge and share best practices. Its 2023 edition started with a launch event with the participation of Frances Fitzgerald, Member of the European Parliament, Fausto Parente, Executive Director at EIOPA, Katarina Ivanković Knežević, Director of Social Rights and Inclusion at the European Commission, and Didier Millerot, Head of Unit for Insurance and Pensions at the European Commission.

As part of its contribution to the ERW, EFAMA organized a webinar on 29 November on how to protect pension savers in defined contribution (DC) pension plans. Speakers included Thomas Richert (BVI), Anne de Lanversin (Generali Global Pension), Justin Wray (EIOPA), and Ambrogio Rinaldi (COVIP). The discussion was moderated by Jonathan Lipkin, Chairperson of the Committee.

The role of fund and asset management in retirement provision

Long-term savings and pensions have become an important topic in the run-up to the EU elections. Recently, the committee agreed to work on two projects with strategic importance. Firstly, a questionnaire has been sent to member associations to gather information on current pension products offered by the private sector at the national level and the views of member associations regarding the essential features that an occupational pension savings product should ideally have. This information will provide input to the Committee to prepare a position paper on how to foster pension saving, drawing on best practices and experience learned at the national level. Given that pensions are mostly regulated at national level, the aim would be to promote more discussion of policy solutions beyond PEPP, IORP etc.

Secondly, the committee will develop a position highlighting the important role that the asset management industry can play during the payout phase. While the benefits of investing in capital markets and the drawbacks of capital guarantees are generally accepted, there is no consensus about the way savings should be managed during the decumulation phase. Based on the outcome of these two projects, the committee endeavours to prepare a document highlighting the solutions asset managers can provide to alleviate the pressure on pension systems and help European citizens prepare for retirement. The goal is to influence the priorities and new initiatives of the incoming European Commission in the area of pensions, on the back of the proposals outlined in the Letta and Noyer reports.

“ It is becoming ever more obvious that the EU and member states will need to move further and faster in ensuring citizens make adequate income for retirement, while better mobilising capital for investment and growth. In this important year of elections and institutional change, the Pensions Committee is keen to help EFAMA develop a strong strategic agenda and continue to engage proactively on this critical set of issues. ”

- Jonathan Lipkin (The IA),
Chair of the Pensions Standing Committee



JONATHAN LIPKIN (THE IA)
Chair of the Pensions Standing Committee

LAURE DELAHOUSSE (AFG)
Vice-Chair

F Stewardship, Market Integrity, ESG Investment Standing Committee

This committee is split into three main workstreams: I. SFDR & taxonomy, II. stewardship & corporate sustainability and III. sustainable data & reporting. The first workstream prioritised the SFDR review, as well as the regulatory technical standards for SFDR and ESMA's fund naming guidelines. The second workstream focused on the recent ESG ratings proposal and the development of reporting standards at European (ESRS) and international level (ISSB, GRI). The third workstream covered the Corporate Sustainability Due Diligence Directive, Shareholder Rights Directive and Listing Act.

Sustainable Finance Disclosure Regulation

Sustainable finance regulation is on a continuous journey of improvement, including an extensive review of SFDR by the European Commission and the publication of draft Regulatory Technical Standards supplementing SFDR by the European Supervisory Authorities (ESAs). EFAMA stressed in its [position](#) that the review is a good opportunity to make SFDR more investor-centric, as well as aligning it with existing and upcoming rules, including MiFID/IDD and the Corporate Sustainability Reporting Directive. In addition, we pointed out that any current technical changes by the ESAs could become obsolete when the review is finalised, therefore they need to take a pragmatic and future-proof approach in their work. To assist with this, the committee developed a position paper for the ESAs with feedback on PAIs and various other disclosure rules, as well as a technical follow-up paper to the European Commission. We also worked together with the major finance sector trade associations on a [joint letter](#) asking the European Commission to better coordinate the publication of new rules for SFDR. We have been actively engaging on these topics with the European Commission and the Platform on Sustainable Finance (PSF), with members having the opportunity to engage with the PSF's Chairperson, Helena Viñes Fiestas, and PSF Member Julia Backmann, at workstream meetings.

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SPOTLIGHT ON SFDR IMPLEMENTATION



Our members benefited from a number of tools and events designed to help them navigate the complex world of SFDR implementation.

- The committee's legal interpretation and contact group published an insightful memo which sheds light on certain SFDR implementation challenges.
- Simmons & Simmons updated their online tracker of national SFDR implementation, with a free version available to EFAMA members.
- Simmons & Simmons also hosted a webinar on the updated tracker, where they put a spotlight on recent regulatory changes in Germany, the UK and Hong Kong.
- We partnered with Kneip to provide a webinar on understanding Principle Adverse Impacts (PAI's).

ESG fund names

In our interactions with ESMA, NCAs, and other stakeholders, we have actively participated in the evolution of ESMA's ESG Fund Naming Guidelines. We expressed our concerns, advocating for an adequate implementation timeline and a more nuanced approach to the proposed rules (e.g. environmental versus social terms, transition funds) to preserve the diversity of products profiles and ambitions. Although the final published guidelines did not fully adopt our approach, they did amend the initial proposal and provided an adequate implementation timeline for active products. We continue to engage with stakeholders through Q&As and industry memos to mitigate the risk of market fragmentation, clarify key concepts, and avoid regulatory inconsistencies, ensuring seamless cross-border distribution of funds.

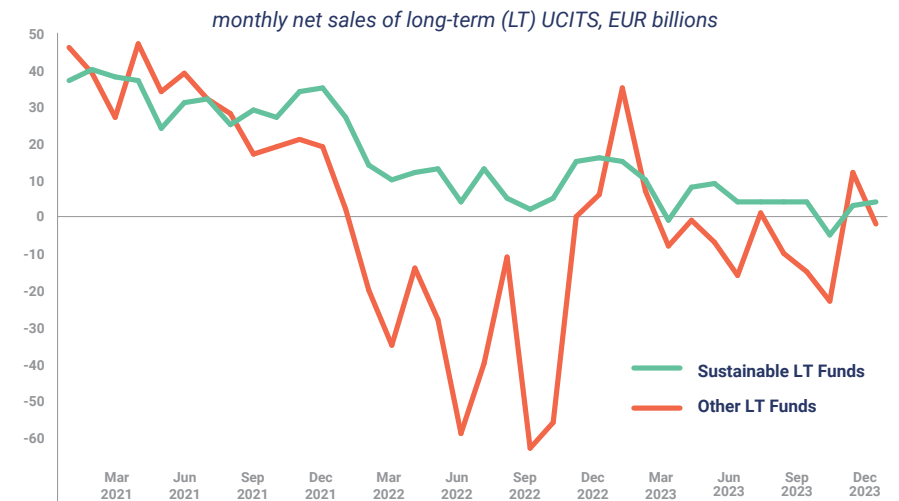
Corporate Sustainability Reporting Directive and sustainable reporting standards

The new CSRD is now in force, expanding the scope of reporting entities but also standardising the corporate sustainability data needed for SFDR and Taxonomy compliance. While these new standards will ultimately help to bridge the ESG data gap faced by asset managers, we will only see the first reports from large companies in 2025 and full reporting by 2029. This means that the current ESG data gap will continue for some time. As a member of EFRAG, EFAMA actively participated in the development of the first set of European Sustainability Reporting Standards. We used this position to continuously stress the importance of the double materiality approach and interoperability between standards, both at the European and international levels with the work of the ISSB (International Sustainability Standards Board). Going forward, we will be involved in the development of ESRS standards for specific sectors and non-EU companies. Unfortunately, policymakers have been rolling back their ambition when it comes to sustainability reporting for corporates. In 2023, the first delegated act regarding CSRD was published, which included significant changes in the materiality assessment. Following a joint stakeholder statement (see box) and some additional engagements, the final rules included more transparency in instances where companies deem certain elements to be non-material (e.g. climate).

Corporate Sustainability Due Diligence Directive

This Directive requires EU companies to behave responsibly, especially on climate and human rights in their supply-chain operations both within and outside the EU. While EFAMA supports these objectives and asset management firms will be complying along with other companies, we had concerns about its potential application to investment funds and the investor-investee relationship. Initially the European Parliament did not take into account that the relationship between an investor and an investee company is qualitatively different from the relationship between purchaser and supplier companies. EFAMA worked diligently to explain these crucial differences to policymakers, partnering with other trade associations, including those from the financial sector. Our efforts paid off, and the final rules excluded the investor-investee relationship from the regulation. This means that asset managers are only subject to the regulation for their own corporate operations. The question of including the investor-investee relationship will be addressed in a future review.

WHAT IS THE DEMAND FOR SUSTAINABLE FUNDS COMPARED TO OTHER LONG-TERM FUNDS?



Greenwashing

EFAMA responded to the ESA's call for evidence on greenwashing, where we stressed that the core attributes of greenwashing need to be understood to address misleading practices, and thereby strengthen the integrity and effectiveness of EU capital markets. Significant areas of financial institution supervision already address numerous greenwashing aspects, therefore any current regulatory gaps should first be identified before proposing new legislation or guidance. We also emphasised the need for an aligned and consistent approach across Europe, and internationally, in order to reduce confusion and the risk of harmful market fragmentation. Earlier this month, the ESAs published their final report on greenwashing in the financial sector, building off the 2023 progress report. The report confirms the necessity of a global response to greenwashing and the development of interoperable standards for sustainability disclosures. They also present a forward-looking view on enhanced supervision with national supervisors gradually working towards convergence, a view which EFAMA supports and has consistently advocated for.



STRONGER TOGETHER

In response to lowered reporting ambitions in the CSRD, EFAMA issued a [joint statement](#) with PRI (Principles for Responsible Investment), UN-EP (United Nations Environment Programme), the Institutional Investors Group on Climate Change (IIGCC), Eurosif, and over 90 investors and financial market participants. This statement stressed the danger of allowing corporates, supported by their consultants and advisers, to determine what is, and isn't, material to report.

ESG ratings and data product providers

For years, EFAMA has been working towards bridging the existing ESG data gap faced by asset managers as a result of the fragmented sustainable finance regulatory framework. Therefore, we were pleased with the creation of a new ESG ratings regulation, which should improve transparency of data sources and methodology, as well as limit potential conflicts of interest. Our main advocacy efforts focused on the scope of the regulation. Excluding other ESG data products leaves the regulatory framework incomplete and does not follow international guidelines. Including our members' proprietary internal ESG ratings, which are disclosed to third parties for non-commercial or regulatory purposes, would serve no legitimate purpose. EFAMA engaged in continuous dialogue with the Council, the European Parliament and the European Commission, with the latter two initially in favour of including non-commercial ratings in the regulation's scope. To ensure that our messages were heard by all important stakeholders, EFAMA also participated in various international events (incl. COP 28), issued numerous press statements, and continuously coordinated with other relevant trade associations. After intense negotiations among the co-legislators, the final outcome excludes proprietary ratings disclosed by financial market participants from the scope (unless included in marketing materials). Furthermore, the regulation's scheduled review will also need to consider whether ESG data product providers should be included.

“ We appreciate the progress made with the new ESG ratings regulation. However, given the interconnected nature of ESG ratings and ESG data, we are disappointed that it will take more than four years to include ESG data products in the scope of the regulation. As such, we urge EU legislators to develop a code of conduct for ESG data providers as soon as possible. ”

- Hanzel Fadrihan (Baillie Gifford),
Committee Vice-Chair

Listing Act – multiple vote shares

This initiative aimed to simplify listing requirements in the EU, making it easier for companies, especially SMEs, to enter the EU capital markets. EFAMA supports this effort, however during the legislative debate some counterproductive ideas were brought forward. These changes included expanding the scope from SME growth markets to all regulated markets and granting too many voting rights to company founders, thereby disenfranchising investors who wish to challenge their decisions at AGMs. The committee members built an industry [position paper](#) and EFAMA engaged with co-legislators and closely followed the negotiations. The final text is now more aligned with investors' needs, limiting the scope to SME Growth Market and Multilateral Trading Facilities and introducing investor safeguards while allowing individual member states to further enhance them.

“ We must untangle the current sustainable finance regulations to unleash their potential. The SFDR revisions are crucial to iron out inconsistencies between EU regulations like MIFID and ESG preferences and ensure alignment with corporate sustainability disclosure . We must aim for disclosures which provides reliable information and ease of access while balancing investors’ needs with practical industry standards.”

- *Isabelle Cabie (Candriam),
Chair of the Stewardship, Market Integrity &
ESG Investment Standing Committee*



ISABELLE CABIE (CANDRIAM)

Chair of the Stewardship, Market Integrity & ESG Investment
Standing Committee

HANZEL FADRILAN (BAILLIE GIFFORD)

Committee Vice-Chair

FRANCESCA MESSINI (DELOITTE)

Chair of Stewardship & Corporate Sustainability Workstream

LAURENCE CARON HABIB

(BNP PARIBAS ASSET MANAGEMENT)

Chair of Sustainable Data & Reporting

It is with great sadness that we honour Elizabeth Gillam (Invesco), Chair of the SFDR & Taxonomy Workstream, who passed away after a lengthy battle with illness. Highly regarded by her peers, we will remember Elizabeth for her many qualities, her friendship and positive energy. She was committed, talented and hardworking – a true and loyal supporter of our industry. Our sincerest condolences go to her family and loved ones.

G Supervision & Third-Country Developments Standing Committee

MARIN CAPELLE
Regulatory Policy Advisor
[marin.capelle\[at\]efama.org](mailto:marin.capelle@efama.org)



Following a strategic review which took place in 2022-2023, the Standing Committee continued to make inroads in positioning EFAMA as the go-to association on third-country developments impacting the European asset management industry. It also contributed to the EU debate on Better Regulation, including reducing reporting burden.

Better Regulation

As the European asset management industry is already heavily regulated, EFAMA is committed to ensuring that existing and future regulatory measures are proportionate and fit for purpose. The committee finalised EFAMA's Key Policy Messages (KPMs) on the EU Better Regulation Agenda, which summarise the ways EU policymakers could develop an enabling regulatory framework for the industry. The committee also [responded](#) to the European Commission's consultation on a Reporting Reduction Package, calling for a) enhanced attention to the risk of introducing reporting duplications, b) better data sharing (especially from central banks to supervisors), and c) access to aggregate supervisory data for trade associations such as EFAMA.



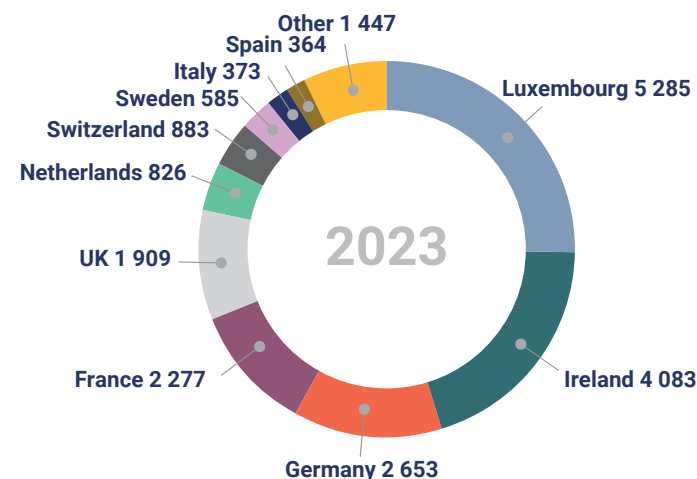
INTERNATIONAL REGULATORY UPDATES

In May 2024, EFAMA partnered with Deloitte to offer the first UK regulatory update. It explored the ramifications of the UK Overseas Fund Regime (OFR) for cross-border distribution of UCITS funds.

Since 2022, we have offered our members a US regulatory update in partnership with Dechert LLP, and in 2023 partnered with PwC on our first Asian regulatory update.

WHERE ARE EUROPEAN INVESTMENT FUNDS DOMICILED?

Net assets by country of domiciliation in EUR billions



Third-country developments

With European investment funds managing more than four trillion Euros in assets on behalf of non-EU investors and UCITS investing almost seven trillion in foreign assets, EFAMA strongly believes that the European industry should not only monitor international developments, but also intervene when necessary. The Standing Committee has engaged in several exchanges, including a discussion with the British FCA on recent UK developments. EFAMA also organised three international regulatory update webinars for members. Finally, EFAMA engaged foreign authorities several times during the 2023-2024 period:

- EFAMA [letter on the SEC safeguarding rule](#), in which EFAMA outlined how the proposal would undermine the ability of European funds to delegate their portfolio management function to the United States;
- [Joint letter](#) to the Securities and Exchange Board of India (SEBI) on the enhanced Indian beneficial ownership disclosure requirements, in which ASIFMA, ICI, and EFAMA explained how these additional requirements would put an excessive administrative burden on funds investing in India;
- [EFAMA response](#) to the FCA consultation on the operationalisation of the OFR, in which EFAMA identified several new barriers that could restrict the access of EU UCITS funds to the UK retail market; and
- EFAMA briefing on EU-China data transfers, in which EFAMA reviewed how the new Chinese data protection regime could prohibit data transfers within corporate groups following a request from European Commission Deputy Director General Alexandra Jour-Schroeder.

“During our strategic review, members re-iterated the importance for EFAMA to be active on the international stage and to support ESMA in pursuing EU-wide supervisory convergence. While these objectives are without a doubt ambitious, the Committee has started to lay the foundations that will allow EFAMA to become a more prominent voice in these areas.”

- *Santo Borsellino (Generali Investments),
Chair of the Supervision & Third-Country Developments Committee*



SANTO BORSELLINO (GENERALI INVESTMENTS)
Chair of the Supervision & Third-Country
Developments Committee

**RAYHAN ODDUD
(J.P. MORGAN ASSET MANAGEMENT)**
Committee Vice-Chair

H Taxation & Accounting Standing Committee

ANTÓNIO FRADE CORREIA
Senior Tax Advisor
[antonio.fradecorreia\[at\]efama.org](mailto:antonio.fradecorreia@efama.org)



This past year was primarily focused on withholding taxes (WHTs). After the release of the FASTER proposal, we discussed our views and recommendations with the European Commission and the Spanish and Belgian Presidencies. In addition, we assisted our members in the OECD's/EU Pillar Two implementations.

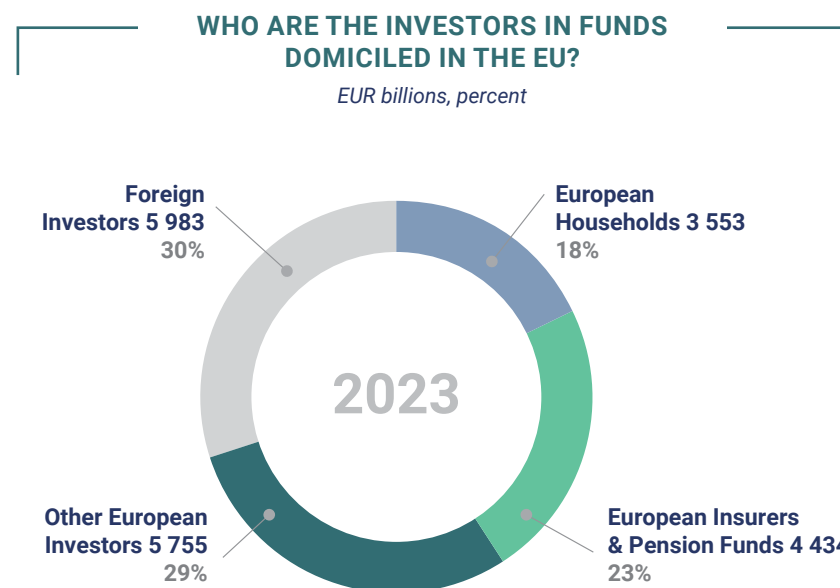
Withholding taxes

The European Commission published its Faster and Safer Tax Excess Refund (FASTER) proposal in June 2023, which aims to harmonize tax procedures across EU countries, rectify inefficiencies, eliminate double taxation and mitigate fraud-related costs, thereby encouraging more cross-border investment in the EU. We maintained regular contact with the Commission (DG TAXUD) and engaged with the Council Working Party on Tax Questions (WPTQ) throughout the technical discussions. Our committee members had various opportunities to meet with experts from the Spanish and Belgian Presidencies, who viewed EFAMA as a go-to association when working on the proposal. Overall, EFAMA's concerns were heard and resulted in better-suited rules for investment funds in the final text, which was agreed by the Council in May this year. Once the proposal is formally adopted, implementing acts, national legislations and administrative guidance will need to be prepared and adopted by 31 December 2028 (to start applying in 2030). Going forward, the committee will focus on national implementation, to ensure the new rules work well in practice and don't create additional hurdles.

OECD Pillar Two implementation

In 2023, Member States began implementing the EU Directive on minimum taxation of multinational groups of entities. As some definitions included in the Model Rules/Directive still raise practical implementation challenges, to assist EFAMA members in preparing for its transposition into their national legislation, the committee closely

monitored the implementation progress and the work of the OECD/Inclusive Framework on commentaries to the model rules, illustrative examples as well as administrative guidance (both existing and forthcoming). We engaged with other financial sector trade bodies and are preparing additional comments for the OECD to ensure the new rules will be implemented in a consistent and harmonised manner.



Tax transparency packages

Although Member States were not yet prepared to reach a technical and political agreement on the Unshell proposal, we continued to closely monitor the technical discussions at the Council level and took proactive steps to advance our interests. We met with the Spanish Council Presidency tax coordinators and delivered a follow-up letter to all Fiscal Attachés with additional comments. In this letter, we called for an agreement on broader exclusion rules for our industry. In addition, we sent a coalition letter to draw attention to the Australian public-Country-by-Country Reporting draft proposal.



VILMA DOMENICUCCI (ALFI)
Chair of the Taxation & Accounting Standing Committee

TIM MCCANN (SCHRODERS)
Committee Vice-Chair

MICHEL LAMBION (DELOITTE)
Chair of the VAT Taskforce

MARIANO GIRALT (BNY MELLON)
Chair of the Blockchain for Taxes Taskforce

RYAN SPITERI (BLACKROCK)
Chair of the Accounting Taskforce

“Taking into account the specific economic and tax characteristics of investment funds is one of the keys to unlocking their full potential to encourage long-term investments and finance the real economy, in line with the ambitions of the CMU. In 2023 and 2024, this trend started to be reflected in tax legislation (mainly under the EU FASTER initiative and the OECD GloBE rules on Pillar 2). However, much remains to be done to ensure that investment funds receive appropriate responses from national and EU tax authorities in terms of adequate tax incentives, legal certainty through processes fit for purpose and the avoidance of unjustified compliance costs.”

- *Vilma Domenicucci (ALFI),
Chair of the Taxation & Accounting Standing Committee*

Trading, Trade Reporting & Market Infrastructures Standing Committee

SUSAN YAVARI
Deputy Director, Capital Markets & Digital
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There was no shortage of challenging files throughout the year. The US move to T+1 settlement went from a fringe issue to one that dominated the committee's work and generated numerous sub-topics requiring engagement at the highest level. EMIR presented a difficult challenge, requiring the buy-side to strike a fine balance between meaningful educational efforts and maneuvering a highly politicised issue between Member States.

Shortening of the settlement cycle

The move to a T+1 settlement cycle was a major priority for the TMR SC throughout 2023. The work was carried out on several levels, with different priorities taking precedence throughout the year. Thanks to a cluster of active members, we undertook early engagement with CLS Bank to raise the major challenge of continued access to CLS for FX settlement with US Securities settling on T+1. EFAMA and its members maintained a sharp focus on this topic, with regular meetings with senior CLS management, US authorities (SEC and NY Fed), and trade associations in other jurisdictions facing similar challenges on access to, and settlement of, FX. Buy-side pressure culminated in CLS committing to a major internal risk assessment with a view to changing the official CLS cut-off time.

At the same time, 2023 saw a major public debate get underway on whether Europe should follow in the footsteps of the US and shorten its settlement cycle to T+1, from today's T+2. EFAMA developed an [in-depth position paper](#) on the impacts on EU asset managers of the US move, and possible remedies to mitigate those impacts. A European cross-industry workstream was also launched which EFAMA fed into, also evaluating the costs and benefits of an EU move. Both workstreams culminated in an [EFAMA response](#) to the ESMA Call for Evidence which closed in December 2023.

Finally, the assessment on preparedness for the US transition, revealed areas where the European regulatory framework created significant clashes with the new US requirements. EFAMA took the lead in defining the scenarios in which those clashes would occur, and started on the task of educating policymakers on these important friction points.

THOUGHT LEADERSHIP

EFAMA became a key expert relied on by policymakers and many other stakeholders in the T+1 debate.

- Panelist at ESMA workshop and European Commission hearing on shortening the settlement cycle, which included high level policymakers from the EU and US
- Hosted a buy-side think tank on the implications of T+1 on trading and settlement risk at Trade Tech
- Created a [short paper](#) on the EU regulatory impacts of the US move to T+1
- Hosted a workshop with regulators (ESMA and NCAs) and industry to discuss the regulatory impacts of the US move to T+1
- Published a [research paper](#) on FX settlement risks for European asset managers
- Interviewed by top publications including the Financial Times, Bloomberg, Ignites and more

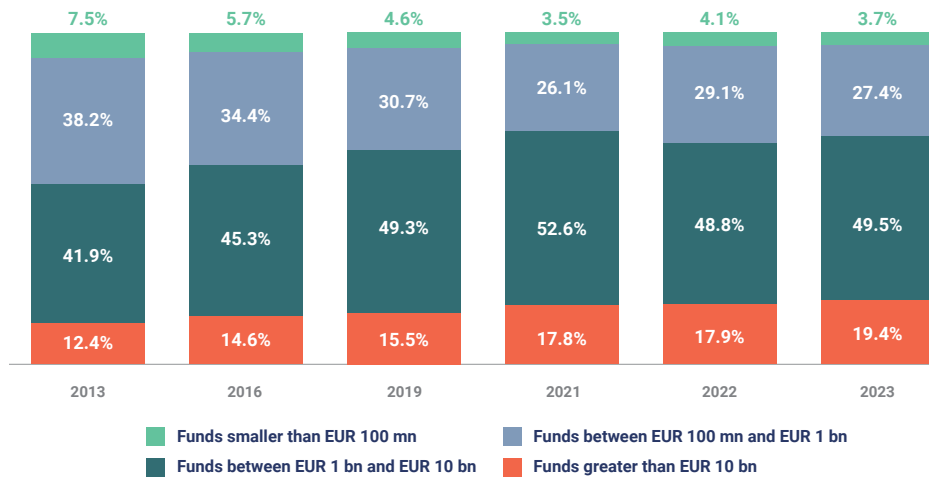
White smoke for EMIR 3.0 and active accounts

This was a highly divisive topic among Member States and the European Parliament, which had the difficult task of finding a compromise in its final report. Unsurprising then that 2023 was marked by continuous dialogues with the Swedish and Spanish presidencies of the EU. EFAMA also worked closely with a number of Member States who were strong supporters of the EFAMA position. During the first half of the year, the focus remained very much on education and demonstrating why active accounts with quantitative thresholds would be detrimental to market participants and the long term goal of enhancing the attractiveness of EU clearing houses. Even more importantly, we questioned the assertion that active accounts would improve financial stability. We argued that creating artificial and smaller liquidity pools subject to a wider basis could in fact be damaging to financial stability. In our view, the Commission's legislative proposal didn't consider how forced relocation of clearing could actually introduce systemic risk and exacerbate liquidity pressures in times of market stress.

EFAMA participated in numerous conferences, panels and webinars highlighting the industry's rationale for rejecting active accounts. This was accompanied by a [number of papers](#) published throughout the year. During the second half of the year, it became clear that the outcome of EMIR 3.0 would be decided along political lines and not on the actual merits of the legislation. [Together with other market participants](#), including ISDA, FIA, AIMA, ICI Global, EACB and more, we strongly opposed active accounts with thresholds. The agreed final package was very much a product of industry advocacy which opposed active accounts with quantitative thresholds.

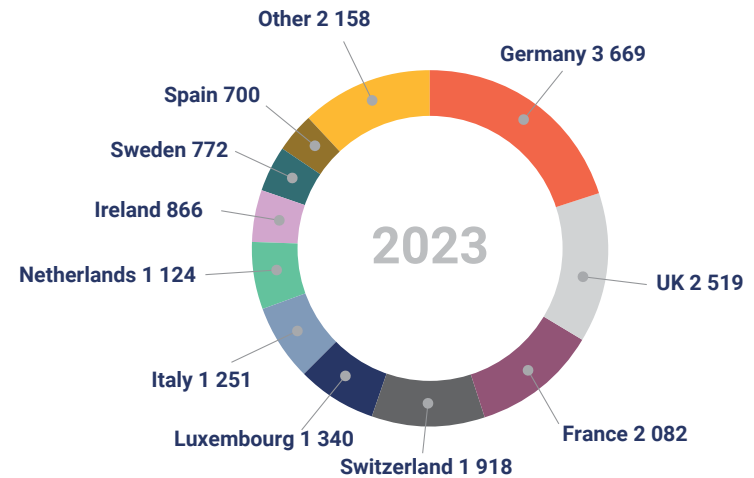
ARE LARGE FUNDS BECOMING INCREASINGLY IMPORTANT IN THE UCITS MARKET?

Percentage of UCITS net assets



WHO IS BUYING FUNDS IN EUROPE?

net assets held by country of investor in EUR billions



MiFID II/MiFIR – agreement on consolidated tape

After many years of intense debate, 2023 saw the final adoption of the MiFID/R review. Thanks to a highly mobilized European buy-side, the co-legislators supported an ambitious consolidated tape which went far beyond what European exchanges had been prepared to concede. Provisions for a consolidated tape for bonds and equities retained all the features that were key to our industry, including: mandatory contribution of data, voluntary consumption, real-time delivery of data, a remuneration model based on reasonable commercial basis and some pre-trade data for equities from the outset. With similarly positive outcomes on Article 13 RCB (reasonable commercial basis), the industry feels confident that the revised MiFID/R legislation will usher in a much improved framework for data provision.

Trade and Transactions Reporting Taskforce

With the coming into force of new reporting standards under EMIR Refit, the Task Force played a key role in conveying questions and requests for clarity to ESMA in order to prepare for the expanded requirements in derivative trade reporting.

“ We remain, as an industry, committed to providing the best advice and analysis to policymakers when it comes to navigating extraneous forces like the US move to T+1. On other topics like clearing (EMIR 3.0), and cost and accessibility of market data (MiFID/R) , we continue to emphasise their importance for the competitiveness of asset managers and the ability to fulfil our fiduciary duty towards end investors.”

- *Isabelle Drinkuth (Amundi Asset Management),
Chair of the Trading, Trade Reporting &
Market Infrastructure Standing Committee*



**ISABELLE DRINKUTH
(AMUNDI ASSET MANAGEMENT)**

Chair of the Trading, Trade Reporting & Market
Infrastructure Standing Committee

**CHRISTIAN SCHMAUS
(ALLIANZ GLOBAL INVESTORS)**

Committee Vice-Chair

MIKE RINKER (UNION INVESTMENT)
Trade and Transaction Reporting Standards
Taskforce

**LYNN CHALLENGER
(UBS ASSET MANAGEMENT)**
T+1 Settlement Taskforce

J Investor Education Platform

The Investor Education Platform is responsible for supporting and guiding the activities of EFAMA in the areas of investor education and financial literacy. Over the last twelve months, IEP members contributed to the preparation of a new brochure on sustainable investing and to a survey to assess the impact of EFAMA's activities around investor education.

BERNARD DELBECQUE
 Senior Director, Economics & Research
[bernard.delbecque\[at\]efama.org](mailto:bernard.delbecque[at]efama.org)



IOSCO World Investor Week 2023

EFAMA Director General, Tanguy van de Werve, took part in the launch event of the 2023 International Organization of Securities Commissions (IOSCO)'s [World Investor Week](#), sharing EFAMA's high-level views on sustainable finance and retail sustainable investing. During the discussion, Tanguy stressed that one of the obstacles to increased retail participation in capital markets is the low level of financial literacy. There is a need to do more in terms of investor education, particularly because of the complexity of the sustainable finance framework. This is required to empower investors and enable them to make informed choices based on disclosures and financial advice that are well understood.

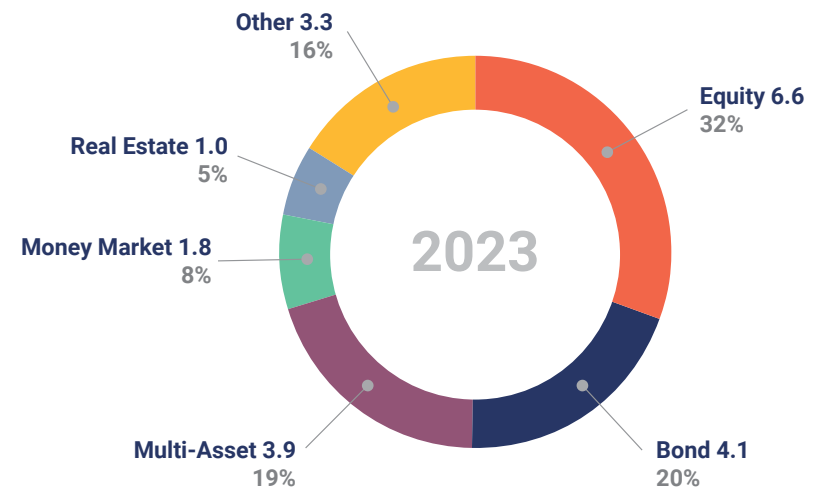


OECD INTERNATIONAL NETWORK ON FINANCIAL EDUCATION (INFE)

The Advisory Board of the OECD International Network on Financial Education (INFE) accepted EFAMA's application to become an affiliate member of the OECD/INFE. As such, affiliate members are automatically invited to attend OECD financial education global events and are consulted systematically and in priority when a financial education document is issued by the OECD or the OECD/INFE for public consultation.

WHAT ARE THE MAIN TYPES OF EUROPEAN INVESTMENT FUNDS?

EUR trillions, in percent of net assets



EFAMA sustainable investing educational brochure

In November 2023, EFAMA launched a brochure, entitled "Sustainable investing explained in 9 questions". This brochure further contributed to IOSCO's World Investor Week, and is available in different EU languages, thanks to the support of EFAMA members. This publication explores what sustainable investing is, what investment strategies are available, what impact you can have as an investor, what questions you should be asking yourself and your financial advisor, as well as how to get started. The clarification about the different types of impact a sustainable investment can have should also help avoid misunderstandings and expectation gaps.

Survey on EFAMA's investor education activities

The Platform members developed a questionnaire for EFAMA members on the impact of the two brochures published by EFAMA (5 tips to do more with your savings & sustainable investing explained in 9 questions) and on relevant topics that could be covered in a new digital brochure and/or short videos in 2024. Based on the results of the survey, the Platform recommended two new initiatives to the EFAMA Board;

- (i) start working on another digital brochure to discuss why and how young millennials should start investing as early as possible to address their long-term goals
- (ii) produce short videos using digital avatars, e.g., Pixar avatars, to disseminate the key messages of the brochures on social media in local languages, assuming that the cost is not too high.

The EFAMA Board approved the recommendation in March and asked the IEP to see to it that the brochures published by EFAMA are made available to the fund distribution networks to make sure they reach their targeted (retail) audience. The Platform has started examining what kind of initiatives could be taken to encourage fund distributors to use the brochures at the point of sales.

“The Investor Education Platform and its members are fully committed to helping advance EFAMA's strategic priority to encourage European savers to invest more and promote retirement saving. Financial and investor education are generally accepted as critical for EU citizens, especially in the context of the Capital Markets Union.”

- Denise Voss (ALFI),
Acting Chair of the Investor Education Platform



DENISE VOSS (ALFI)
Acting Chair of the Investor Education Platform

**NATALIE WESTERBARKEY
(FIDELITY INTERNATIONAL)**
Platform Chair (until February 2024)

K Public Policy Platform

The EU decision-making process requires the industry to react swiftly to the latest policy developments. Our Public Policy Platform (PPP) plays a key role in providing this rapid reaction, sharing the latest intelligence and coordinating timely and effective advocacy strategies. The PPP is an agile platform that organises ad-hoc calls as and when needed.

Reflecting an intense EU legislative agenda, The PPP regularly met during the last twelve months to coordinate actions on Level 1 regulations of primary importance for the asset management industry, including the Retail Investment Strategy, MiFID-R reviews as well as, ESG Ratings, the CSDDD and the EMIR 3.0 legislative proposals. Those frequent exchanges with members proved very useful to stay abreast of the latest evolutions of the debate and adjust our advocacy plans accordingly.

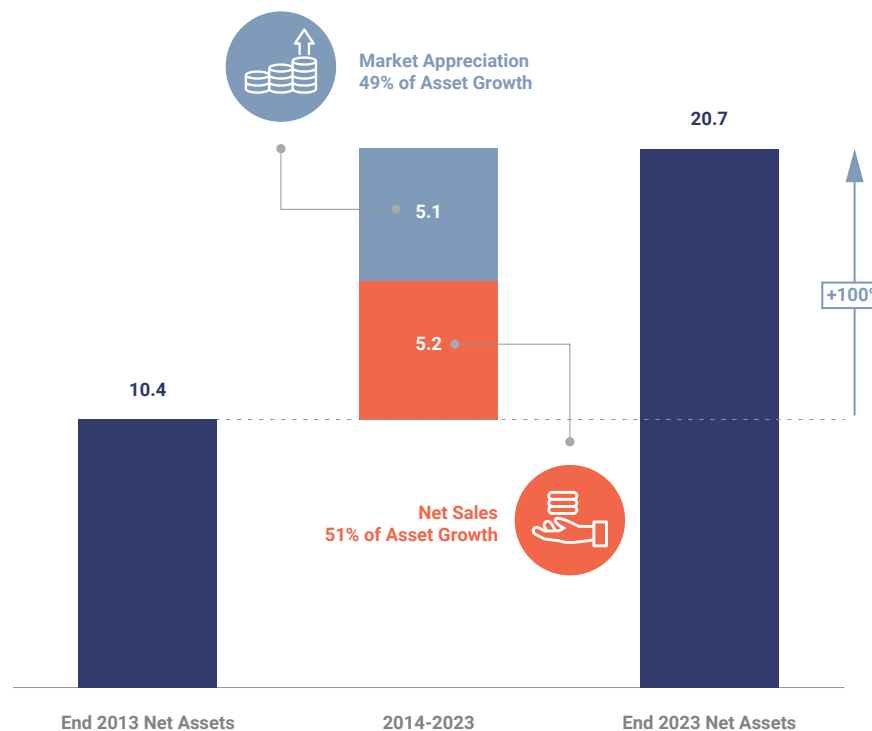
Members of the Public Policy Platform also played an instrumental role in developing EFAMA's policy recommendation for the next EU legislative cycle, titled "Unlocking Private Investment to Fund Europe's Triple Transitions – towards an enabling regulatory framework".



VINCENT INGHAM
Director, Regulatory Policy

HOW HAVE THE NET ASSETS OF UCITS AND AIFS GROWN OVER THE PAST DECADE?

EUR trillions



L Data Platform

Newly created in 2023, the Data Platform brings together an impressive set of industry experts to identify cross-cutting data issues faced by our sector. These are categories of data that the asset management industry is a major consumer of, i.e. market data, benchmark data and ESG data.

Following extensive discussions, the platform members finalised a paper providing an in-depth view on market practices, conventions and the broader regulatory framework earlier this year. This report brings to light the uneven playing fields between data providers and argues that this impedes competition in the market, perpetuates unfair pricing practices and generally supports an oligopolistic market structure for data. A number of overarching regulatory principles are recommended to restore fairness and competition in the market and foster consistency, quality, transparency, and availability of financial and non-financial data at a reasonable price.

You can download the paper [here](#).



VIRGINIE FAVRE (NATIXIS)
Chair of the Data Platform

SUSAN YAVARI

Deputy Director, Capital Markets & Digital

[susan.yavari\[at\]efama.org](mailto:susan.yavari[at]efama.org)



ELONA MORINA (until 11/2023)

Regulatory Policy Advisor

“The anti-competitive market practices of data providers has become increasingly problematic for asset managers and other market participants. The cost of the data we rely on has risen tremendously over the last decade and continues to rise. If we want to support competitive European capital markets and lower the cost of investing, we need an improved regulatory framework to address these issues.”

- Sébastien Renaud (Pictet Asset Management),
Vice-Chair of the Data Platform

04

**RESEARCH &
PUBLICATIONS**

04 RESEARCH & PUBLICATIONS

Market Insights

Market Insights analyse recent industry trends and developments based on the latest available data. Since EFAMA launched its Market Insights series, they have won a solid reputation as credible and respected publications. They are widely read by policymakers, journalists and other stakeholders. Five EFAMA Market Insights have been published since June 2023:

- > Issue #12, The SFDR fund market – State of play, latest market developments and outstanding regulatory issues
- > Issue #13, UCITS ETFs: A growing market in volatile times
- > Issue #14, The AIF market – an overview
- > Issue #15, The cost of UCITS available to retail investors
- > Issue #16, Investment fund distribution channels in Europe

➔ Consult the latest editions on our [website](#).



Asset Management in Europe Report 2023

The 15th edition of EFAMA's asset management report provided an in-depth analysis of recent trends in the European asset management industry, focusing on where investment funds and discretionary mandates are managed in Europe.

The report includes several new features. Firstly, it summarises the results of a survey of a core group of our corporate members on the main opportunities and challenges for the industry. Second, it included concrete examples from many of our corporate members of recent voting and engagement activities by asset managers. Finally, it contained an analysis by McKinsey on the impact of generative AI in asset management and a contribution by Cerulli Associates on investor demand for private assets.

➔ Download the report [here](#).



04 RESEARCH & PUBLICATIONS

Unlocking private investment to fund Europe's triple transitions (March 2024)

This paper lays out the asset management sector's policy priorities for the next five years, building on the in-depth expertise of our members. This includes practical recommendations for keeping Europe competitive and developing deeper, more integrated and liquid capital markets in Europe.

The recommendations focus around four main objectives:

- Make competitiveness a central element of all EU policies: To remain competitive on the global stage, Europe needs to remain an attractive place to invest and do business.
- Encourage European savers to invest more and promote retirement saving: Turning more savers into first time investors is a necessary condition for deepening European capital markets. It is also essential for citizens to secure their financial well-being, particularly in retirement.
- Unlock the full potential of sustainable finance by streamlining existing EU regulations: We applaud the leadership role taken by the EU in sustainable finance. But work remains to be done to achieve the objective of financing the transition towards a more sustainable world.
- Promote efficient, stable and integrated European capital markets and support digital innovation: Capital market infrastructure in Europe needs further harmonisation if we want to benefit from increased efficiency.

→ Explore the full priorities paper [here](#).



Fact Book 2024

EFAMA's annual Fact Book is the reference publication for comprehensive information on the European investment fund industry. The Fact Book, provided free of charge online, includes a thorough analysis of the demand for funds by type of investors and the growth of the ESG market. It also contains individual country reports with detailed information on the investment fund market and regulatory developments in 29 European countries. In addition to data, numerous short commentaries on relevant regulatory developments are profiled.

Summary materials have been made available, including a video interview on key trends and an easy-to-share brochure of the main findings. In addition, an Excel-based statistical package containing data on the 5 largest asset managers in various European countries and more than 50 tables with historical time series data was made available for purchase.

→ Download the Fact Book [here](#).



04 RESEARCH & PUBLICATIONS

Household participation report (January 2024)

The second edition of EFAMA's report on household participation in capital markets analyses the progress made in recent years by European households in allocating more of their financial wealth to capital market instruments (pension plans, life insurance, investment funds, debt securities and listed shares) and less in cash and bank deposits. It also includes policy recommendations on improving retail participation in capital markets, including for the Retail Investment Strategy currently under discussion.

→ Download the full report [here](#).



Sustainable investing explained in 9 questions (November 2023)

EFAMA produced an animated brochure to help EU citizens navigate the often complex realm of sustainable investing, empowering them to make investment decisions which support their personal values. It explores what sustainable investing is, what investment strategies are available, what impact you can have as an investor, what questions you should be asking yourself and your financial advisor, as well as how to get started. Developed in close cooperation with EFAMA's Investor Education Platform, numerous national associations have created translations of the brochure in their local languages. This brochure forms our contribution to IOSCO's World Investor Week, of which we are a long-time supporter.

→ Access the full report and available translations [here](#).

Open-ended funds and resilient capital markets (July 2023)

EFAMA published an ambitious report that provides a comprehensive overview of the contribution of the European investment fund sector to the diversity and resilience of capital markets. For the best part of this decade, macro-prudential supervisors have argued that investment funds contribute to the build-up of systemic risks. This report shows that the investment fund sector is not systemically important, although there may be pockets of risk, and asks macro-prudential supervisors to rethink investment fund risk. It contains concrete policy recommendations that were used extensively in our advocacy efforts with the FSB and IOSCO in advance of the publication of their guidance documents on liquidity management.

→ Visit our [website](#) for the full report.



04 RESEARCH & PUBLICATIONS

FAQ on ELTIF Regulation 2.0 (January 2024)

To support the success of ELTIF 2.0, EFAMA and Arendt published a Frequently Asked Questions brochure, which covers the most burning questions asset managers may have regarding the new regime. The new European Long-Term Investment Fund (ELTIF) Regulation became applicable on 10 January 2024. Going forward, fund managers will have greater flexibility to make ELTIFs more attractive to end investors, particularly on the retail side, unlocking their potential as a source of financing for the European real economy.

→ The FAQ can be requested [here](#).



The capital flywheel (May 2024)

EFAMA, the European Banking Federation (EBF) and the Federation of European Securities Exchanges (FESE) co-developed a joint report authored by Oliver Wyman on the development of European capital markets and recommendations to enhance their competitiveness. Interviews with 37 senior industry stakeholders shed light on the opportunities and challenges faced in the coming decade. The findings of this report provide a roadmap for policymakers, regulators, and industry stakeholders, showing how demand-side and supply-side steps taken over the next 5 years can build momentum, attract more investors, and create more investment opportunities for the decades ahead.

→ Download the full report on our website [here](#).

04 RESEARCH & PUBLICATIONS

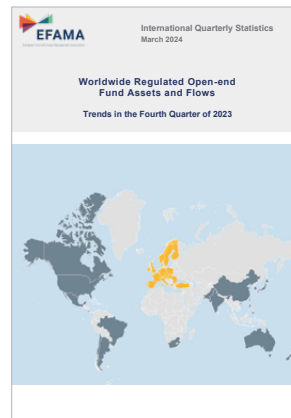
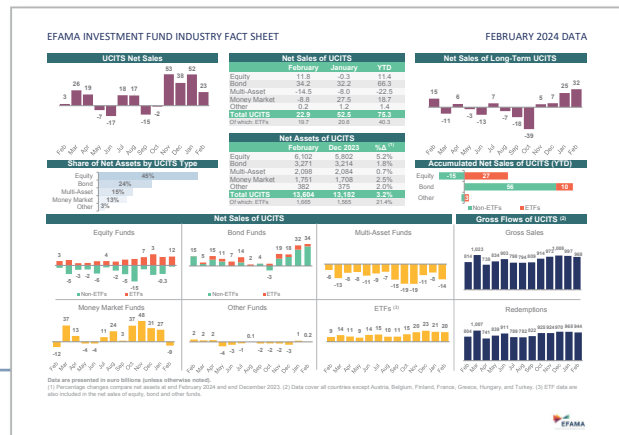
Statistical updates

EFAMA provides regular statistical updates on the investment fund sector to members and publishes key figures on trends for the public.

Statistical publications include:

- > European Monthly Industry Fact Sheet
- > European Quarterly Statistical Release
- > International Quarterly Statistical Release

➔ All public information is available [here](#).



3 Questions 2

The 3 Questions To (3Q2) is a series of short interviews with subject matter experts, aiming to raise awareness on specific issues of interest to our membership in a clear and concise manner. The look and feel has been modernised and two issues were published during the period under review:

- > We spoke with Patricia Horsfall, Chair of EFAMA's Management Companies Standing Committee, on the revised **AIFMD** and UCITS Directive rules.
- > Malgorzata Rusewicz, CEO of the Polish Chamber of Fund and Asset Managers, answered our questions on the **Polish asset management sector**, including its structure, main investors, and the most pressing regulatory issues for them at EU level.

➔ Read our 3Q2 series [here](#).





05

EVENTS

05 EVENTS

29th Investment Management Forum

23-24 November 2023 | BNP Paribas Fortis Chancellerie



The Investment Management Forum is EFAMA's flagship event, bringing together industry leaders, investors and policymakers to discuss topics of common interest and importance. We were thrilled to welcome delegates once more in Brussels for important and interesting debates on asset management regulation.

This year our superb keynote speakers included European Commission Director, Marcel Haag, ESMA Chair, Verena Ross, IOSCO Chair, Jean-Paul Servais, and FSB Secretary General, John Schindler. The 2023 programme also featured an exclusive CEO panel discussing latest market trends, and sessions on how the next European Commission can forge stronger capital markets, the US move to T+1 settlement, navigating the ESG investing regulatory framework and turning Europe's savers into investors.

→ Visit the conference [website](#).

Keynote speakers include

#IMF2023

Jean-Paul Servais
Chair
International
Organisation of
Securities Commissions
(IOSCO)

Verena Ross
Chair
European Securities
and Markets Authority
(ESMA)

John Berrigan
Director General
DG FISMA
European Commission

John Schindler
Secretary General
Financial Stability Board
(FSB)

Investment Management Forum
23-24 November 2023 • www.efama.eu



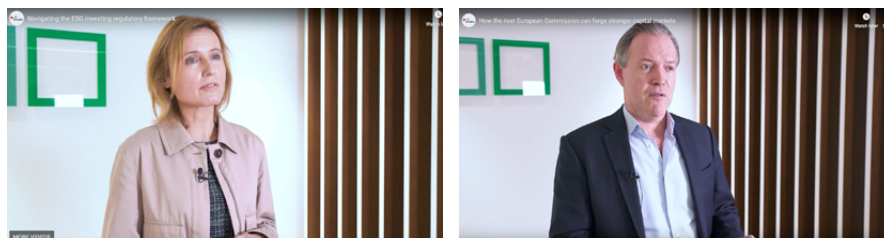
05 EVENTS

Post-IMF communications

We took the opportunity to interview many of the senior experts that participated in the 2023 Investment Management Forum. We were able to publish key takeaways from each session moderator, expanding the reach of our discussions beyond the conference participants on the day.

We also produced a highlights video, which showcases the richness of the Forum's content and networking.

→ Visit the [website](#).



Regulatory updates for members

EFAMA members benefit from updates every eight weeks on the latest regulatory developments from our team of policy advisors. This gives our members the opportunity to ask detailed questions to our subject matter experts.

European Retirement Week

Exploring solutions to Europe's pension challenges

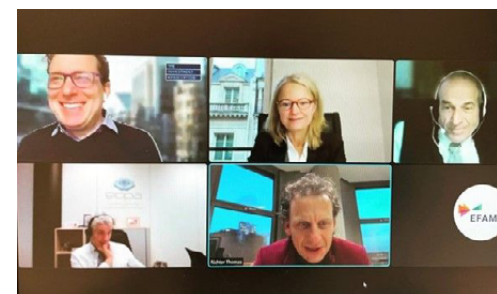


European Retirement Week

27 November – 1 December 2023 | In-person & virtual

EFAMA was proud to be a participant and founding organizer of the third edition of [European Retirement Week](#). This initiative provides a platform for a wide range of stakeholders to debate the future of pensions in Europe and raise citizens' awareness of the need to save for retirement and achieve pension adequacy.

The week started with an in-person launch event including keynote speeches by Fausto Parente, Executive Director at EIOPA, Frances Fitzgerald MEP, Katarina Ivanković Knežević, Director of Social Rights and Inclusion at the European Commission, and Didier Millerot, Head of Unit Insurance and Pensions at the European Commission. EFAMA also hosted a [webinar](#) on how to protect pension savers in defined contribution pension plans, including speakers from the EIOPA, the International Organization of Pension Supervisors and the asset management sector.



05 EVENTS



Central clearing: what it is and the impact of active accounts

14 June 2023 | Virtual

EFAMA brought together a number of buy-side clearing experts who explained the basics of central clearing and examined the Commission's proposal on active accounts. Speakers included buy-side firms from across Europe, covering different client types and clearing books. This webinar was an excellent opportunity for policymakers to engage with asset management firms and the people responsible for derivatives trading and counterparty risk and was very well attended.

→ Watch the recording [here](#).

Turning European savers into investors: progress made and policy recommendations

6 February 2024 | Virtual

On the occasion of our recently released research paper on household participation in capital markets, EFAMA organized an interactive webinar to discuss the key findings and various policy actions that could make a difference to retail participation in capital markets. This included discussions on progress made in recent years, country differences across Europe, and policy initiatives within the current Retail Investment Strategy and more broadly.

Moderated by:



Tanguy van de Werve
Director General



Bernard Delbecque
Senior Director -
Economics & Research



Andreas Stepnitzka
Deputy Director -
Regulatory Policy

→ Watch the recording [here](#).

Research workshops

> 20 June 2023 | Virtual

The illusion of control: why financial crises happen, and what we can (and can't) do about it

With Professor Jon Danielsson, Reader in Finance and Director of Systemic Risk Centre, London School of Economics

→ See [here](#) for more.

> 31 October 2023 | Virtual

Climate change concerns and the performance of green versus brown stocks

With Professor Kris Boudt, UGent, VUB/A, and Sentometrics

→ See [here](#) for more.

> 3 June 2023 | Virtual

Firm's profitability and ESG score: A machine learning approach

With Professor Rita Laura D'Ecclesia, Università di Roma Sapienza

→ See [here](#) for more.



05 EVENTS



Webinars

EFAMA's webinars are a popular feature with our members, and well-attended. Five webinars were held in cooperation with our associate members over the past 12 months.

- > **Navigating ESG's complex regulatory landscape**
4 October 2023, with Simmons & Simmons
- > **SEC private fund rules**
7 February 2024, with Dechert LLP
- > **US regulatory update**
9 April 2024, with Dechert LLP
- > **UK regulatory update**
15 May 2024, with Deloitte
- > **Understanding principle adverse impacts (PAIs): A practical guide**
22 May 2024, with Kneip

The next EU legislative cycle – what to expect for financial services

24 April 2024 | Virtual

Together with Kreab, EFAMA hosted an informative webinar on the upcoming EU elections, the possible ramifications for the next 5 years of policymaking, and what this could mean for financial services in future. David Reed, Senior Partner at Kreab Brussels, outlined the priorities of various policymakers, supervisors and other organisations, and discussed competitiveness, completing the Capital Markets Union project, and furthering EU integration.

The Secretariat on stage

Our internal policy experts often [speak at relevant high-level conferences and events](#), which provide a great opportunity to debate key topics with other stakeholders and ensure our members' views are part of the conversation. During the last twelve months, we spoke on a wide range of topics including the CMU, retail investing, T+1, ELTIF, pension reform, financial stability, sustainable finance, consolidated tape, market data and much more.





06

MEDIA

06 MEDIA



A growing social media presence

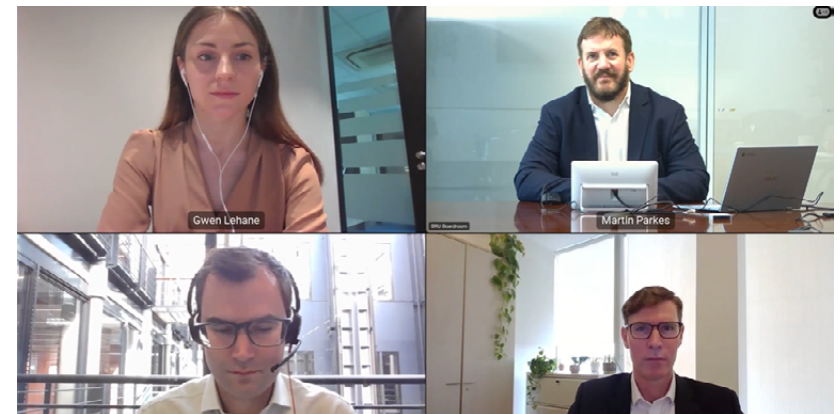
EFAMA has an active [LinkedIn](#) presence, where we inform our followers and the wider public about policy news, press releases, events & webinars, publications and much more. We have seen our community of followers across Europe grow significantly over the last year, and continue to grow, reaching almost 11,000 this June.

Over the course of the last year, EFAMA expanded the video content offered on our [Youtube channel](#). In addition to recordings of our public online events and summary videos on publication key findings, we published video interviews with EFAMA committee Chairs and staff, and many videos showcasing our Investment Management Forum 2023.



EFAMA in the news

We ensure that our key messages on important topics for our members are covered by some of the most-read news publications for asset managers, regulators and other stakeholders across Europe. This includes press releases, interviews, opinion pieces, quotes and webcasts. Over the last twelve months, we distributed 55 [EFAMA press releases](#) covering topics such as FASTER, the CMU, retail investment, sustainability disclosures and reporting standards, financial stability, ESG ratings, ELTIF, AIFMD, T+1 settlement, EU-based clearing, consolidated tape, and market trends. We also contributed numerous quotes and interviews to many media outlets.



07

MEMBERSHIP

(Status as at 1 June 2024)

07 NATIONAL ASSOCIATIONS

AUSTRIA

VÖIG

Vereinigung Österreichischer Investmentgesellschaften
Austrian Association of Investment Fund Management Companies

www.voeig.at



BELGIUM

BEAMA asbl | vzw

Belgische Vereniging van Asset Managers
Association Belge des Asset Managers
Belgian Asset Managers Association

www.beama.be



BULGARIA

BAAMC

Bulgarian Association of Asset Management Companies

www.baud.bg



CROATIA

HGK

Udruženje društava za upravljanje investicijskim fondovima
Association of Investment Fund Management Companies

www.hgk.hr/udzu



CYPRUS

CIFA

Cyprus Investment Funds Association

www.cifacyprus.org



CZECH REPUBLIC

AKAT ČR

Asociace pro kapitálový trh České republiky
Czech Capital Market Association

www.akatcr.cz



DENMARK

DIA

Danish Investment Association

www.financedenmark.dk/the-danish-investment-association/



FINLAND

FFI

Finance Finland

www.finanssiala.fi



FRANCE

AFG

Association française de la gestion financière
French Asset Management Association

www.afg.asso.fr



GERMANY

BVI

Bundesverband Investment und Asset Management e.V.
German Investment Funds Association

www.bvi.de



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07 NATIONAL ASSOCIATIONS

GREECE

HFAMA

Hellenic Fund and Asset Management Association

www.ethe.org.gr



HUNGARY

BAMOSZ

Befektetési Alapkezelők és Vagyonkezelők
Magyarországi Szövetsége

Association of Hungarian Investment Fund
and Asset Management Companies

www.bamosz.hu



IRELAND

IRISH FUNDS

www.irishfunds.ie



ITALY

ASSOGESTIONI

Associazione Italiana del Risparmio Gestito

www.assogestioni.it



LIECHTENSTEIN

LAFV

Liechtensteinischer Anlagefondsverband
Liechtenstein Investment Fund Association

www.lafv.li



LUXEMBOURG

ALFI

Association Luxembourgeoise
des Fonds d'Investissement

Association of the Luxembourg Fund Industry

www.alfi.lu



MALTA

MASA

Malta Asset Servicing Association

www.masa.mt



NETHERLANDS

DUFAS

Dutch Fund and Asset Management Association

www.dufas.nl



NORWAY

VFF

Verdipapirfondenes forening

Norwegian Fund and Asset Management Association

www.vff.no



POLAND

IZFA

Chamber of Fund and Asset Managers

www.izfa.pl



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07 NATIONAL ASSOCIATIONS

PORTUGAL

APFIPP

Associação Portuguesa de Fundos de Investimento,
Pensões e Patrimónios

Portuguese Association of Investment Funds,
Pension Funds and Asset Management

www.apfipp.pt



ROMANIA

AAF

Romanian Association of Asset Managers

www.aaf.ro



SLOVAKIA

SASS

Slovenská asociácia správcovských spoločností

Slovak Association of Asset Management Companies

www.sass-sk.sk



SLOVENIA

ZDU-GIZ

Slovenian Investment Fund Association

www.zdu-giz.si



SPAIN

INVERCO

Asociación de Instituciones de Inversión Colectiva
y Fondos de Pensiones

Spanish Association of Investment and Pension Funds

www.inverco.es



SWEDEN

FONDBOLAGENS FÖRENING

Swedish Investment Fund Association

www.fondbolagen.se



SWITZERLAND

Asset Management Association Switzerland

<https://www.am-switzerland.ch/>



TURKEY

TKYD

Türkiye Kurumsal Yatirimci Yöneticileri Derneği

Turkish Institutional Investment Managers' Association

www.tkyd.org.tr



UNITED KINGDOM

The Investment Association

www.theinvestmentassociation.org



07 CORPORATE MEMBERS



07 ASSOCIATE MEMBERS

ALLEN & OVERY



08

**ASSOCIATION
STRUCTURE**

ASSOCIATION STRUCTURE

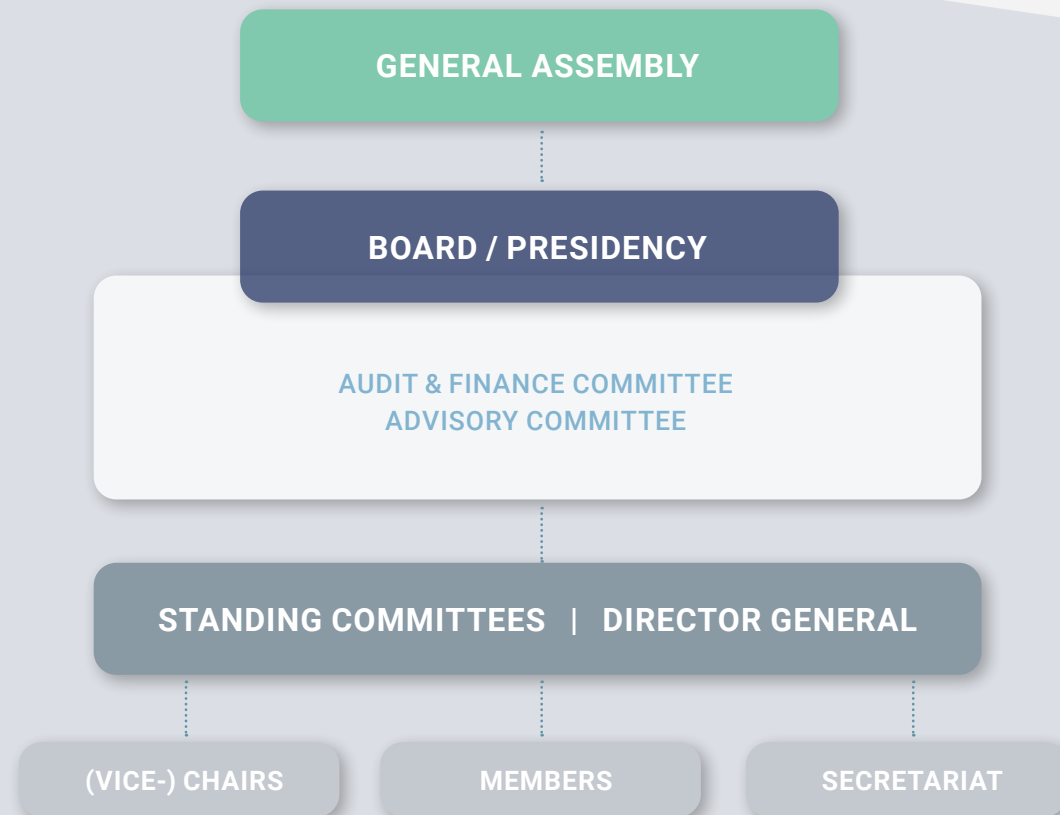
The **Board of directors** is the body in charge of steering and supervising the activities of EFAMA as well as approving the associations' strategy and priorities. It is accountable to the **General Assembly**, which meets once a year. Board members are elected for a 2-year term and vote on issues where there is a lack of consensus. Each Board member has one vote, decisions are made by a simple majority.

The Board consists of the **Presidency** and representatives of the National Associations. Corporate Members meet with the Presidency twice a year to exchange on strategic topics.

The Board has two **Board committees**: the Audit & Finance Committee and the Advisory Committee.

Committee Chairs and Vice-chairs are appointed by the Board for a 2-year term, upon a recommendation by the Advisory Committee.

Our **Standing Committees** are at the heart of EFAMA's policy and regulatory work, where members regularly meet to exchange information and ideas, discuss and develop industry positions on policy initiatives and new regulation, and shape and support EFAMA's advocacy.









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BOARD OF DIRECTORS

(Status as at 1 June 2024)

09 BOARD OF DIRECTORS (June 2023 – June 2025)

| Country | Name | Association / Company |
|---|-----------------------|--|
| President | Sandro PIERRI | BNP Paribas Asset Management |
| Vice President | Massimo GRECO | J. P. Morgan Asset Management |
|  | Dietmar RUPAR | VÖIG - Austrian Association of Investment Fund Management Companies |
|  | Marc VAN de GUCHT | BEAMA - Belgian Asset Managers Association |
|  | Natalia PETROVA | BAAMC - Bulgarian Association of Asset Management Companies |
|  | Hrvoje KRSTULOVIĆ | Croatian Association of Investment Fund Management Companies |
|  | Marios TANNOUSIS | CIFA - Cyprus Investment Funds Association |
|  | Jana BRODANI | AKAT CR - Czech Capital Market Association |
|  | Birgitte SØGAARD HOLM | DIA - Danish Investment Association |
|  | Jari VIRTÄ | Finance Finland |
|  | Laure DELAHOUSSE | AFG - French Asset Management Association |
|  | Thomas RICHTER | BVI - German Investment Funds Association |
|  | Marina VASSILICOS | HFAMA - Hellenic Fund and Asset Management Association |
|  | Andras TEMMEL | BAMOSZ - Association of Hungarian Investment Fund and Asset Management Companies |
|  | Pat LARDNER | Irish Funds |
|  | Fabio GALLI | ASSOGESTIONI - Italian Association of Investment Management |
|  | Annette von OSTEN | LAFV - Liechtenstein Investment Fund Association |
|  | Serge WEYLAND | ALFI - Association of the Luxembourg Fund Industry |

(Status as at 1 June 2024)

09 BOARD OF DIRECTORS (June 2023 – June 2025)

| Country | Name | Association / Company |
|---|-------------------------|---|
|  | Anabel MIFSUD | MASA - Malta Asset Servicing Association |
|  | Jeroen VAN WIJNGAARDEN | DUFAS - Dutch Fund and Asset Management Association |
|  | Bernt ZAKARIASSEN | VFF - Norwegian Mutual Fund Association |
|  | Małgorzata RUSEWICZ | IZFA - Chamber of Fund and Asset Managers |
|  | João PRATAS | APFIPP - Portuguese Association of Investment Funds, Pension Funds and Asset Management |
|  | Jan PRICOP | AAF - Romanian Association of Asset Managers |
|  | Marian MATUSOVIC | SASS - Slovak Association of Asset Management Companies |
|  | Mirjana KOPORCIC VELJIC | ZDU - Slovenian Investment Fund Association |
|  | Angel MARTINEZ-ALDAMA | INVERCO - Spanish Association of Investment and Pension Funds |
|  | Fredrik NORDSTRÖM | FBF - The Swedish Investment Fund Association |
|  | Adrian SCHATZMANN | AMAS - Asset Management Association Switzerland |
|  | Yagiz ORAL | TKYD - Turkish Institutional Investment Managers' Association |
|  | Chris CUMMINGS | The IA - The Investment Association |

(Status as at 1 June 2024)



10

STAFF

10 STAFF



TANGUY van de WERVE *
Director General



HAYLEY MCEWEN*
Communication & Membership Development

REGULATION (EXCL. PENSIONS)

STATISTICS & RESEARCH, PENSIONS, INVESTOR EDUCATION

ADMIN & MEMBERSHIP SUPPORT



VINCENT INGHAM *
Director, Regulatory Policy
Regulatory Policies, CMU



BERNARD DELBECQUE *
Senior Director, Economics & Research
Pensions SC, Economics & Research,
Investor Education




MIRIAM BRUNSON *
Membership Services



ANDREAS STEPINITZKA
Deputy Director, Regulatory Policy
Distribution & Client Disclosures



FEDERICO CUPELLI
Deputy Director, Regulatory Policy
Fund Reg., Asset Prot. & Services Prov.,
Supervision & 3rd country development



HAILIN YANG
Database, Statistics, Quarterly releases,
Factsheets




ISABELLE VAN ACKER
Executive Secretary



ANTONIO FRAIDE CORREIA
Taxation & Accounting



SUSAN YAVARI
Deputy Director, Capital Markets &
Digital – Trading, Trade reporting &
Market Infrastructures




THOMAS TILLEY
Fact Book, Asset Management Report,
Research & Economics



ANYVE ARAKELIJAN
ESG, Stewardship, Mkt integrity



GWEN LEHANE
Fund Regulation (ELTIF),
Benchmarks, Costs of data



VERA JOTANOVIC
Financial econometrics, Quantitative
Studies, Research & Economics




KIMON ARGYROPOULOS
Distribution & Client Disclosures



ZUZANNA BOGUSZ
ManCo Regulation & Services



MARTINA TORELLI
Regulatory Policy Intern



CHIARA CHIODO
Stewardship, Mkt integrity, ESG



MARIN CAPELLE
Supervision, AIFMD, Investor Education

We also worked with:
Carolina De Giorgi (Distribution & Client Disclosures, until October 2023)
Elona Morina (Fund Regulation, until November 2023)

* Member of Management Committee



EFAMA

European Fund and Asset Management Association

1974
50 years
2024

EFAMA

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