Asset Management in Ireland in 2026: A Year in Preview

Dillon Eustace

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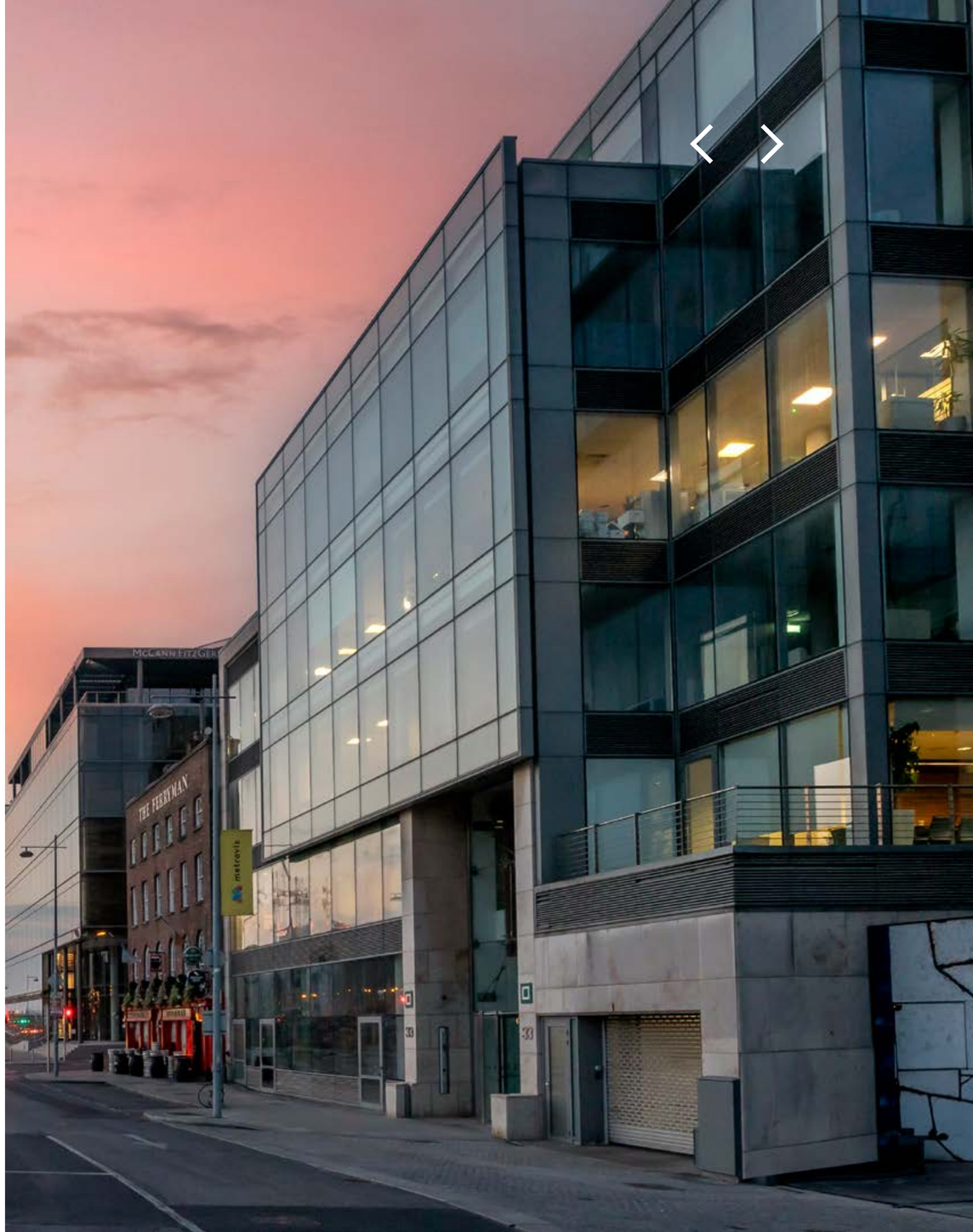
Against the backdrop of a wide range of EU simplification reforms and rising geopolitical tensions, AIFMD & UCITS reforms taking effect in April, an expected growth of Irish ETFs and ETF share classes within non-listed Irish funds as well as the enhancement of the Irish private assets funds offering in light of significant changes being made to the Central Bank of Ireland's (**Central Bank**) AIF Rulebook in early 2026, it is shaping up to be another busy year for Irish fund management companies and their funds.

In this briefing we provide an overview of some key dates which should be appearing in the compliance calendars of Irish funds and their management companies[1] for 2026 as well as a synopsis of some of the legal and regulatory developments we can expect in the next twelve months[2 3]

1 References to "management companies" or "fund management companies" in this briefing include Irish UCITS management companies, AIFMs, self-managed UCITS funds and internally managed AIF funds unless otherwise indicated.

2 This briefing does not include filing requirements in respect of any filing where the filing date is determined with reference to the relevant entity's annual accounting date (such as the filing of annual and semi-annual financial statements with the Central Bank) nor does it address any tax-related deadlines to which funds and fund management companies may be subject. Periodic reviews of matters such as the content of PRIIPS key investor documents or the risk management framework, business plan and policies and procedures of fund management companies as well as any other actions required to be taken under the Irish Funds Corporate Governance Code are also excluded from the remit of this briefing. In addition, it does not address other matters where a set date for compliance has not been applied, including for example (i) the obligation imposed on fund management companies which have chosen to implement a shareholder engagement policy under SRD II to provide shareholders with information on their website on how that policy has been implemented in the previous 12 months or (ii) the obligation imposed on Irish UCITS management companies (and Irish UCITS SMIC) by the Central Bank to carry out a viability and suitability assessment of each Irish-domiciled UCITS under management when assessing the investment manager's annual presentation.

3 In each case, the dates for filing of returns with the Central Bank are estimated only and may vary from firm to firm. Clients should therefore refer to the details made available on the Central Bank's portal for the specific filing date imposed by the Central Bank for each return.



Key Dates

Date	Matter	Suggested action to be taken
1 January 2026	Revised framework under the EU Benchmarks Regulation (BMR) begins to apply with the scope of the existing regime being significantly reduced so that only those fund management companies and corporate funds which use (i) benchmarks deemed "critical" or "significant" under the new framework, (ii) EU Paris-aligned benchmarks and EU Climate Transition benchmarks and (iii) certain commodity benchmarks will be subject to obligations thereunder.	Assess use of benchmarks to determine whether the BMR framework applies in light of the benchmarks used by funds under management. If the fund management company determines that a fund is using an in-scope benchmark within the meaning of the BMR, an appropriate governance framework should be implemented to ensure compliance with the BMR. All fund management companies which "use" any benchmarks within the meaning of the BMR should implement a process to ensure that the ESMA register is periodically checked to confirm that benchmark administrators of in-scope benchmarks used by funds under management appear on that register.
31 January 2026	Deadline for all Irish UCITS management companies and AIFMs to file annual confirmation of ownership with the Central Bank.	Filing of confirmation of ownership to be made with the Central Bank by the deadline.
20 February 2026	All UCITS which continue to prepare a UCITS KIID must file updated KIIDS which contain updated performance data for the period ended 31 December 2025 and which incorporate any other required revisions with the Central Bank no later than 20 February 2026.	Ensure that all UCITS KIIDs are updated and filed with the Central Bank by the applicable deadline.
28 February 2026	Deadline for filing the annual fitness and probity (F&P) PCF confirmation and CF certifications for both Irish authorised UCITS management companies/AIFMs and Irish authorised investment funds with the Central Bank under its Fitness & Probity regime.	F&P PCF and CF annual assessments to be carried out, taking account of the revised F&P guidance published by the Central Bank in November 2025. PCF confirmations and CF certifications to be filed with the Central Bank by the applicable deadline.
12 March 2026	Deadline for responding to the European Commission's Consultation on EU Venture Capital and Growth Capital Reforms.	If desired, submit a response to the European Commission by the applicable deadline.
24 March 2026	The Central Bank's revised Consumer Protection Code 2025, which includes Standards for Business Regulations and related guidance, begins to apply.	Irish fund management companies and Irish domiciled funds should assess the application of the Standards of Business Regulations to them and where considered in-scope, implement appropriate arrangements to comply with them.
31 March 2026	Deadline for Irish fund management companies to submit their completed "Registers of Information" on all contractual arrangements with ICT third party service providers to the Central Bank.	Irish fund management companies should ensure that their "Registers of Information" are completed in accordance with applicable EU delegated acts and submitted to the Central Bank by the applicable deadline.

Date	Matter	Suggested action to be taken
March 2026[4]	Feedback to the European Commission's proposal to reform SFDR[5] can be provided here. See "Sustainable Finance" below for further details.	If desired, submit a response to the European Commission by the applicable deadline.
Quarter 1 2026	Central Bank is expected to publish a discussion paper on tokenization.	Those fund management companies and fund promoters who are considering the establishment of tokenized funds or tokenized share classes should provide feedback to the Central Bank's discussion paper once published.
16 April 2026	Revised Irish UCITS and AIFMD frameworks take effect. See "Implementation of revised Irish UCITS and AIFMD frameworks" below for further details.	Irish fund management companies and Irish domiciled funds should carry out a gap analysis to determine required changes to fund documentation, policies and procedures and operational arrangements to comply with the revised Irish UCITS and AIFMD frameworks.
5 June 2026	Changes made to the EU market abuse framework introduced under the EU Listing Act[6] begin to apply.	Funds whose shares are listed or traded on an EU regulated market, multi-lateral trading facility or organised trading facility as well as their management companies and investment managers should assess the changes being introduced to the existing EU market abuse framework and implement any necessary changes to existing policies and procedures to ensure compliance by the applicable deadline.
30 June 2026	Deadline for any fund falling within the scope of the European Union (Gender Balance on Boards of Certain Companies) Regulations 2025 (**Gender Balance Regulations**) to ensure that at least 40% of its non-executive directors are members of the underrepresented sex, whether the underrepresented sex is male or female.	Assess whether any fund structured as a PLC under Irish law **whose shares** are admitted to trading on at least one EU regulated market Member State falls within scope of the Gender Balance Regulations and if in scope, take any necessary steps to ensure compliance by the applicable deadline.
30 June 2026	Fund management companies which (i) are obliged due to their size; or (ii) which have chosen to report on the principal adverse impacts of investment decisions on sustainability factors under Article 4 of the SFDR must publish a full PAI statement on their website on or before this date.	Relevant PAI statement should be prepared and published by in-scope fund management companies on their website by the applicable deadline. Regard should be had to best practices identified in the most recent ESA report on entity-level PAI reporting published in September 2025.
H1 2026	Central Bank to launch a comprehensive review of the Irish fund service providers (including Irish fund management companies) addressing topics including delegation, outsourcing and governance.	Irish fund management companies are encouraged to monitor this review closely.

4 As at the date of this briefing, the closing date for providing feedback to the European Commission has not yet been set as the adopted proposal is not yet available in all EU languages. The feedback period will remain open for 8 weeks after the proposal is made available in all EU languages.
5 Regulation (EU) 2019/2088 as amended
6 Regulation (EU) 2024/2809

Date	Matter	Suggested action to be taken
2 July 2026	The new framework under the EU ESG Ratings Regulation[7] which amends the SFDR begins to apply. Under the new regime, marketing communications referencing an ESG rating issued by the fund management company or a delegate will be required to include a weblink to detailed information relating to that ESG rating.	Fund management companies should carry out a scoping exercise to establish whether they fall within the scope of the ESG Ratings Regulation by virtue of them issuing proprietary ESG ratings and referencing same in marketing communications. If currently in scope, relevant marketing documentation should (i) be updated to include a link to a website where certain prescribed information on the ESG rating can be accessed or (ii) alternatively revised to remove references to such ESG ratings.
2 August 2026	The majority of the provisions of the EU AI Act[8] begin to apply, including transparency requirements, rules relating to GPAI models and penalties applicable to providers of GPAI models.	Fund management companies using AI models should assess implications of applicable provisions of the EU AI Act and ensure compliance with any such requirements ahead of the applicable deadline.

7 Regulation (EU) 2024/3005
8 Regulation (EU) 2024/1689

Legislative and Regulatory Developments and Areas of Focus in 2026

Implementation of revised Irish UCITS and AIFMD frameworks

Quarter 1 of 2026 will see Irish fund management companies and Irish domiciled funds implementing necessary changes to fund documentation and operational and governance frameworks to comply with changes to the Irish UCITS and AIFMD regulatory framework which will apply from 16 April 2026[9].

The new regulatory framework implements **Directive (EU) 2024/927** (Omnibus Directive) into Irish law as well making some other targeted changes to the domestic UCITS and AIFMD frameworks through the publication of revised Central Bank UCITS Regulations and a revised Central Bank AIF Rulebook.

Changes to the existing frameworks which may need to be considered as part of this implementation project include without limitation:

- The introduction of a new liquidity management tool framework which will apply to all UCITS funds and all open-ended AIFs. This includes complying with the obligation to select and provide for at least two liquidity management tools in the fund documentation of any UCITS fund/any open-ended AIF and implementing appropriate policies and procedures to support the activation and de-activation of such tools;
- Enhanced prospectus and periodic report disclosure requirements introduced under the Omnibus Directive and by the Central Bank under its revised domestic regime;
- The introduction of a pan-EU loan origination framework which will set down a common set of rules for AIFMs managing AIFS which engage in lending to third parties;
- Extending the list of permitted activities for Irish UCITS management companies (which now include for example receipt and transmission of orders in relation to financial instruments) (which include for example originating loans on behalf of an AIF);
- The introduction of a revised (and more flexible) performance fee framework for Irish UCITS funds and Irish Retail AIFs;
- The introduction of a more flexible regulatory regime for those considering implementing a private assets strategy within an Irish domiciled QIAIF, including the relaxation of existing wholly-owned subsidiary rules, the introduction of more flexible rules to support differentiated share classes and the ability of a QIAIF to guarantee the obligations of third parties subject to compliance with applicable legislation.

The Central Bank has **confirmed** that it will facilitate a streamlined filing process for post-authorisation updates to fund documentation for AIFs and UCITS arising from these changes. Where relevant, the implementation timeline should also factor in obtaining necessary approvals from the board of directors of the relevant fund and fund management company as applicable as well as obtaining any requisite approval from shareholders.

9 The enhanced regulatory reporting framework applicable to UCITS management companies and in-scope AIFMs introduced under Directive (EU) 2024/927 does not apply until 16 April 2027

Sustainable Finance

Sustainable finance is likely to remain a key regulatory focus for Irish fund management companies and their funds for 2026 with a number of EU and domestic initiatives to be tracked over the course of the next 12 months.

- Domestic developments

In October 2025, the Central Bank published its feedback report on the 2024 common supervisory action carried out by ESMA, the Central Bank and other EU competent authorities on sustainability risks and SFDR disclosures (**Feedback Report**). To the extent not already completed, Irish fund management companies should now be assessing compliance with Central Bank expectations as outlined in the Feedback Report and making any necessary changes to fund documentation and governance frameworks to align with the supervisory expectations outlined in the Feedback Report.

A detailed analysis of the Feedback Report is available **here**.

- EU Developments

Reform of SFDR

In November 2025, the European Commission published a **proposal** to overhaul the SFDR regime in order to simplify the existing framework and improve end investors' ability to understand and compare sustainability-related products.

The European Commission has proposed the introduction of a new voluntary opt-in product categorisation regime for sustainability-related products comprising three categories, namely (i) sustainable products, (ii) transition products and (iii) "ESG Basics" products each of which must meet certain quantitative criteria.

Non-categorised funds will be prohibited from including any sustainability related claims in marketing communications and may only include limited sustainability-related disclosures in their pre-contractual disclosures. Other proposals include the removal of certain entity-level disclosure obligations and a simplification of the existing pre-contractual and periodic report templates.

2026 will see the Council of the EU and the EU Parliament reviewing the proposal with the intention of reaching political agreement. Fund management companies implementing ESG strategies should review the Proposal and engage with industry bodies on any areas of specific concern so as to inform advocacy efforts with the negotiating institutions. Feedback on the proposal can also be provided directly to the European Commission **here**.

A detailed overview of the Proposal is available **here**.

Sustainable Finance

EU ESG Ratings Regulation begins to apply

From 2 July 2026 any fund management company which issues a proprietary ESG rating and discloses that rating in marketing communications must include a link to a website where certain prescribed information on the ESG rating can be accessed by investors. Accordingly, early 2026 should see fund management companies which use proprietary ESG ratings conducting a review of their marketing communications to determine whether any reference to such ratings is included in their suite of marketing materials. If such references are included, the fund management company should implement a project plan to gather the required information on the ESG rating and disclose that information on its website ahead of the deadline. Alternatively marketing materials should be revised to remove any references to such proprietary ESG ratings.

Omnibus regulation amending CSRD[10], the CSDDD[11] and delegated acts under the Taxonomy Regulation[12]

Following extensive negotiations between the EU institutions in 2025, the Omnibus Sustainability Package which amends the Corporate Sustainability Reporting Directive (**CSRD**) and the Corporate Sustainability Due Diligence Directive (**CSDDD**) is expected to be published in the Official Journal of the EU in Quarter 1 2026.

Under the revised framework, Irish fund management companies will only fall within the scope of the CSRD reporting framework (as well as issuer-level reporting obligations under Article 8 of the EU Taxonomy Regulation) if they have an average of 1000 or more employees and exceed a net €450 million in net turnover during the financial year. In addition, the Omnibus I simplification package also restricts the scope of the CSDDD to EU companies which exceed in the last financial year 5000 employees on average and have a net worldwide turnover of at least €1.5 billion, meaning that only the largest of EU companies will fall within its scope.

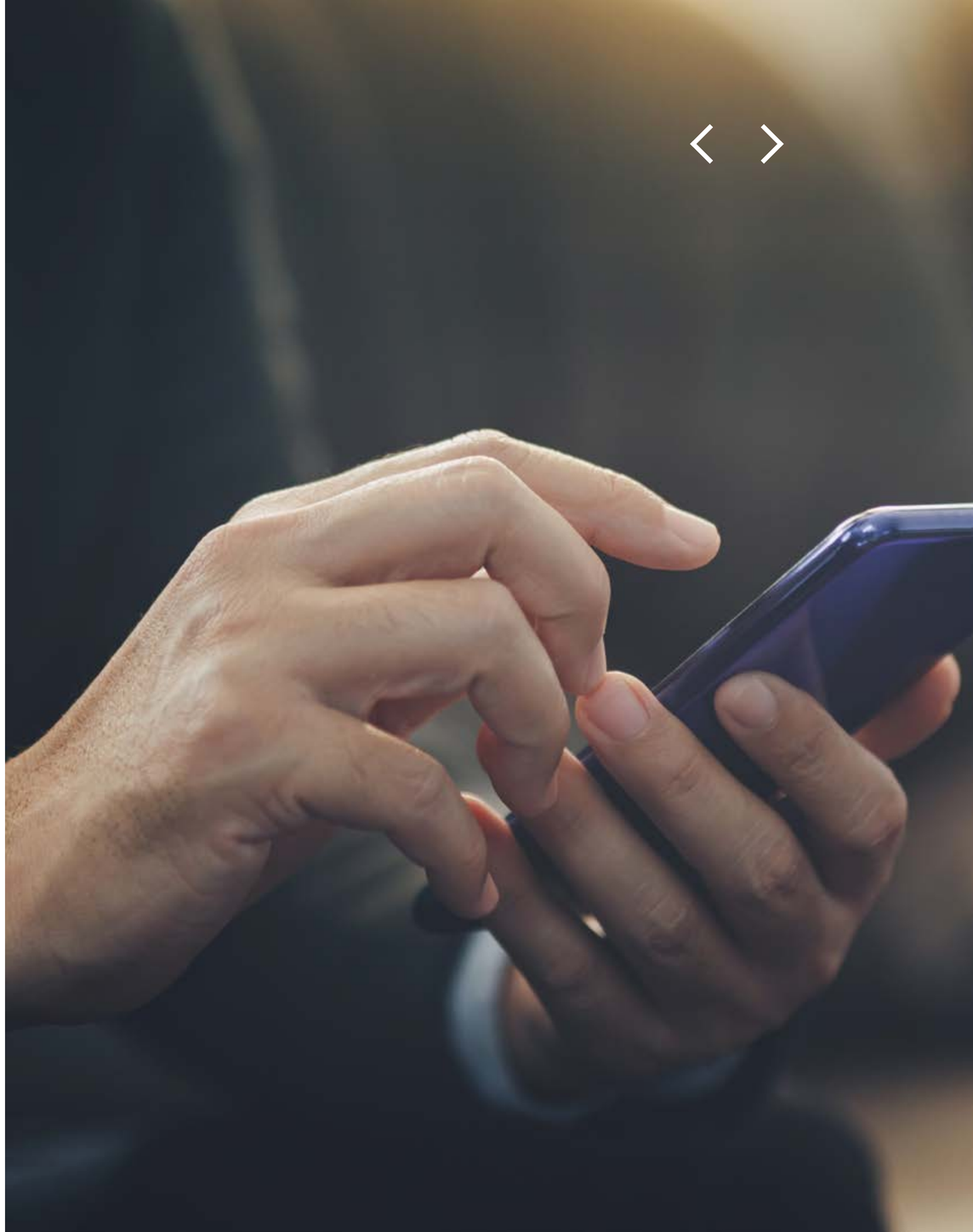
10 Directive (EU) 2022/2464
11 Commission Delegated Regulation (EU) 2021/2178
12 Directive (EU) 2024/1760

Delegation and Outsourcing

The Central Bank has indicated that it will set out initial proposals with respect to its review of the Irish fund service provider (FSP) framework in H1 2026. This review, which is expected to conclude in H2 2027, will focus on delegation, outsourcing and governance matters and will result in the issue of a consolidated FSP rulebook.

Separately, Irish fund management companies will be looking ahead to the new delegation reporting framework introduced under the Omnibus Directive which will apply from April 2027 under which they will be required to provide detailed information to the Central Bank on their delegation arrangements, including reporting on the amount and percentage of assets under management which are subject to delegation arrangements, the resourcing in place within the fund management company to oversee those delegation arrangements and providing details of the initial and ongoing due diligence carried out on its delegates. ESMA has **indicated** that it will consult on regulatory technical standards and implementing technical standards on these reporting obligations in the second half of 2026.

Those Irish fund management companies operating within an EU group will also be monitoring how the European Parliament and the Council of the EU react to the proposal put forward by the European Commission under its EU Market Integration Package published in December 2025 to bring EU group companies outside of the scope of the UCITS/AIFMD delegation rules.



EU Market Integration Package

In December 2025, the European Commission published an ambitious and far-reaching **proposal** aimed at removing existing barriers to single market integration in EU financial services, a key element of its Savings and Investments Union strategy announced earlier in the year (**Proposal**).

The Proposal comprises of three legislative amendment proposals, namely a directive which amends the UCITS Directive[13], AIFMD Directive[14] and MiFID II Directive[15], a regulation which amends fourteen existing EU financial services regulations, including the Cross Border Distribution of Funds Regulation[16], EMIR[17] and the ESMA Regulation[18], replaces the Settlement Finality Directive[19] and amends the Financial Collateral Directive[20].

The Proposal includes a number of key changes to the UCITS and AIFMD frameworks which are likely to be of keen interest to those operating in the EU asset management space.

These include bringing EU group companies outside of the scope of the UCITS/AIFMD delegation rules, harmonized authorisation processes for management companies and EU funds across the EU and overhauling the EU cross-border distribution framework for investment funds and the removal of the requirement to prepare a UCITS KIID where UCITS are only marketed to professional investors, all of which have been broadly welcomed by the EU asset management sector.

Other elements of the proposed reforms include a proposal to require ESMA to carry out an annual review of the supervision of large EU groups of management companies by each relevant national competent authority (**NCA**) and granting ESMA a range of powers if corrective action is not taken by the relevant NCA(s). The European Commission has also proposed granting ESMA additional powers to address cross-border issues which are hampering the passporting of management services/ depositary services or the cross-border distribution of funds within the EU (including as a measure of last resort, the ability to suspend the right of investment funds, management companies or depositaries to operate on a cross-border basis).

2026 will see the Proposal being scrutinised and negotiated by the European Parliament and the Council and we would encourage Irish fund management companies and promoters of Irish funds to engage with advocacy efforts of relevant industry bodies.

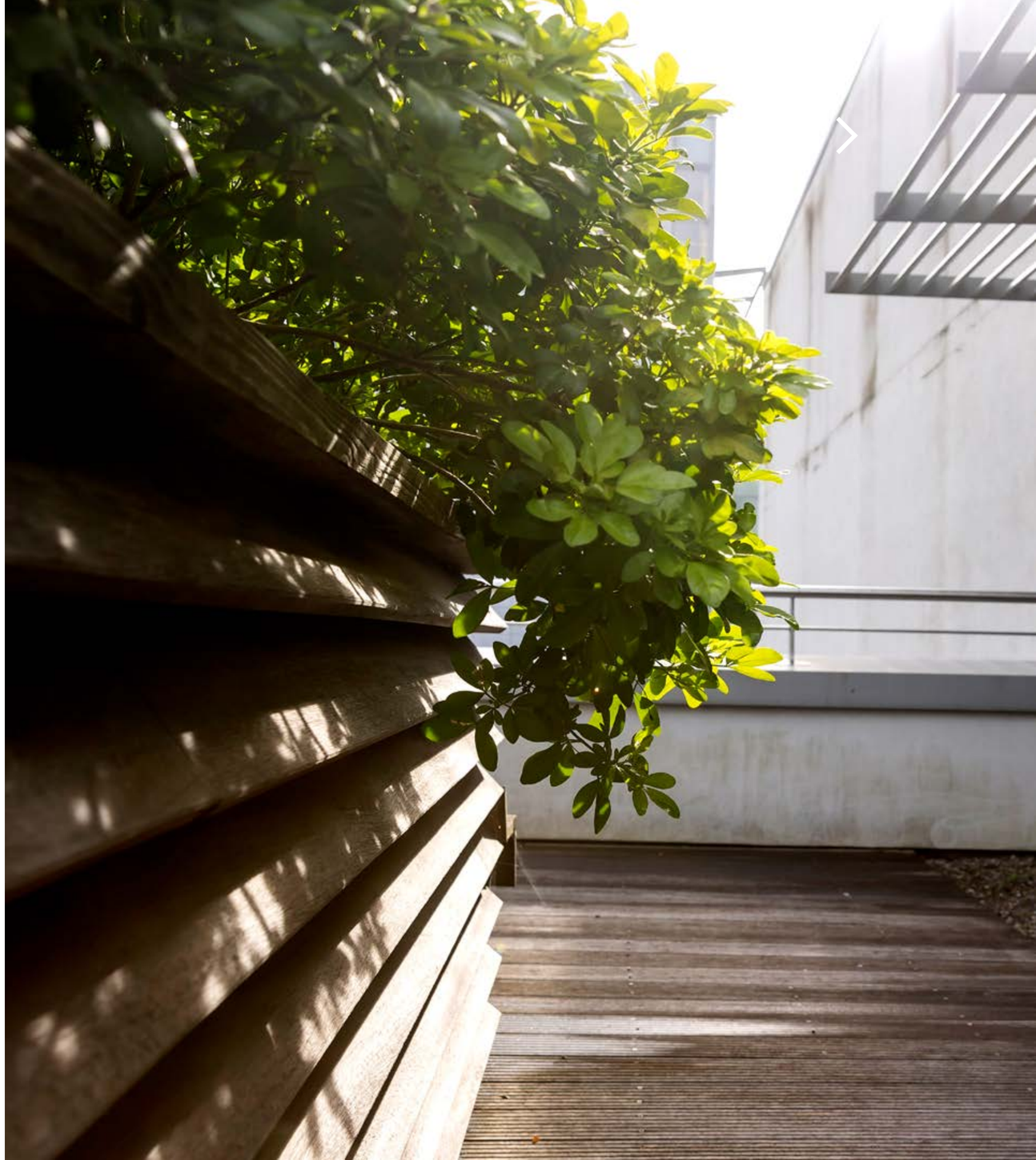
A detailed overview of the Market Integration Package is available **here**.

13 Directive 2011/61/EU as amended
14 Directive 2002/47/EU as amended
15 Regulation (EU) 2019/11s
16 Regulation 648/2012/EU as amended
17 Regulation 1090/2010/EU as amended
18 Directive 2014/65/EU as amended
19 Directive 98/26/EC as amended
20 Directive 2009/65/EC as amended

Exchange-traded funds

An ongoing focus for those fund promoters already implementing ESG strategies within Irish-domiciled funds in 2026 will be to ensure that primary and secondary market trading arrangements of such funds comply with relevant Central Bank supervisory expectations as outlined in its **2024 Dear Chair Letter** and re-emphasised in a recent **speech** delivered by the Central Bank on the topic.

Following the policy reforms introduced by the Central Bank last year which allow for the establishment of exchange-traded classes within Irish domiciled non-listed funds, we also expect significant interest in this framework from fund promoters (including from those who have not traditionally operated within the ETF space) looking to widen the potential distribution channels for existing funds while benefitting from the fund's existing track record and economies of scale. Focus on governance and planning for T+1 migration in 2027 will also likely be a focus of ETF promoters this year.



Reform of the EU Securitisation Regulation

In June 2025, the European Commission published a **proposal** to revitalise the EU securitisation framework by making targeted changes to the EU Securitisation Regulation and the EU Capital Requirements Regulation. The Council of the EU has published its **position** on the European Commission's proposal and the European Parliament is due to vote on proposals in May 2026, paving the way for inter-institutional negotiations to begin in H2 2026.

Those fund promoters investing in the securitisations market will be particularly interested in the scope of "public securitisations", the changes made to existing due diligence requirements, including those required in respect of third country securitisations and whether the finalised text will see any meaningful increase to the problematic 10% "outstanding debt" limit[21] which UCITS investing in securitisations must currently comply with.

21 Under Article 56 of the UCITS Directive, a UCITS can currently acquire no more than 10% of the debt securities of a single issuing body

Other Developments

UCITS Eligible Assets Directive

In June 2025, ESMA published its technical advices on the review of the UCITS Eligible Assets Directive[22]. While the European Commission will have regard to these advices in considering any revisions to the UCITS framework, it is not bound by the proposals put forward by ESMA. We understand that it is considering publishing its own call for evidence or consultation paper later this year to gather feedback from interested stakeholders on required changes to the UCITS framework before finalising its legislative proposal.

Preparation for T+1 Settlement Reforms

In advance of the EU's transition to a T+1 settlement cycle on 11 October 2027[23], 2026 should see fund management companies carrying out end-to-end reviews of existing trading, clearing and settlement arrangements to identify any obstacles which could prevent them from settling transactions within 1 business day and taking steps to remove any such obstacles by making necessary changes to systems and processes ahead of the go-live date for T+1 settlement. Where relevant, consideration should also be given to change fund settlement timings to T+2.

22 A detailed overview of ESMA's technical advices on its review of the UCITS Eligible Assets Directive is available **here**
23 The UK and Switzerland will transition to a T+1 settlement cycle on the same date

EU Retail Investment Strategy

In December 2025, the Council of the EU **announced** that agreement had been reached with the European Parliament on the EU Retail Investment Strategy. Fund management companies are awaiting the publication of technical legal texts to assess in particular the finalised rules on peer group assessments which must be used to assess whether total costs and charges applied to retail funds are justified and proportionate. Changes to the PRIIPS KID disclosure requirements as well as an extension of the types of investors which can be categorized as "professional clients" under MiFID II are also being introduced as part of this legislative package.

AML

While the Sixth Anti-Money Laundering Directive (Directive (EU) 2018/1673) must be transposed by Member States into national law by 10 July 2027, certain provisions (mainly in relation to the beneficial ownerships registers) must be transposed into Irish law by July 2026.

Separately AMLA (Authority for Anti-Money Laundering and Countering the Financing of Terrorism) has assumed AML/CFT supervision functions from the EBA as of 1 January 2026. One of the duties of AMLA is to develop technical standards and supervisory guidelines for obliged entities. Accordingly, the Central Bank intends to retire any domestic publications (e.g. AML guidelines and "Dear CEO" letters) that are no longer applicable or relevant during the course of 2026.

Conclusion

We look forward to continuing to work with our clients on the wide range of topics outlined above during the course of 2026. If you have any questions arising from this briefing, please contact your usual contact in the Dillon Eustace Asset Management and Investment Funds Team.

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