



## Deloitte's PRIIPs solution for non-UCITS funds

With only a few months left before becoming effective, the PRIIPs regulation is a race against the clock.

### **PRIIPs Delay...**

Following the decision of the European Commission as announced on 9 November 2016, the Packaged Retail and Insurance-based Investment Products (PRIIPs) regulation, which was due to become effective as of 1 January 2017, has been postponed by 12 months and will enter into force on 1 January 2018.

### **...but uncertainty remains due to the lack of Level 2 provisions**

The Level 2 Regulatory Technical Standards (RTS) were rejected by the European Parliament during their plenary session of 14 September 2016 – with no fixed date for their resubmission. Consequently, the final

content and format of the PRIIPs Key Information Document (KID) is currently not determined. This leaves very little time for all impacted industries to prepare and implement the new requirements.

### **The PRIIPs regulation remains a race against time**

The PRIIPs regulation brings with it significant practical challenges for manufacturers to compile, verify and maintain a large volume of KIDs, particularly for firms that focus on non-UCITS PRIIPs. The revised RTS are expected to be resubmitted to the European Parliament during Q1 2017. In the worst-case scenario, the approval process by the European

Parliament could take up to three months, meaning end of Q2 2017, for the adoption of the long awaited Level 2 measures.

With the PRIIPs regulation entering into force in 1 January 2018, firms would be left with a relatively narrow implementation window to meet the regulatory requirements and business imperatives on time. With only a few months left before becoming effective, the PRIIPs regulation is a race against the clock. ➔

## Exemption for certain non-UCITS funds until 31 December 2019

It is understood that similarly to UCITS funds, management companies, investment companies and persons advising on, or selling, units of non-UCITS funds to retail investors might benefit from a grandfathering period from the PRIIPs obligation until 31 December 2019 when a Member State applies rules on the format and content of the key information document to non-UCITS funds offered to retail investors.

In other words, under certain conditions non-UCITS funds offered to retail investors which, in accordance with the rules set down by their respective Member States, produce UCITS KIID documents would not need to produce a PRIIPs KID until 31 December 2019.

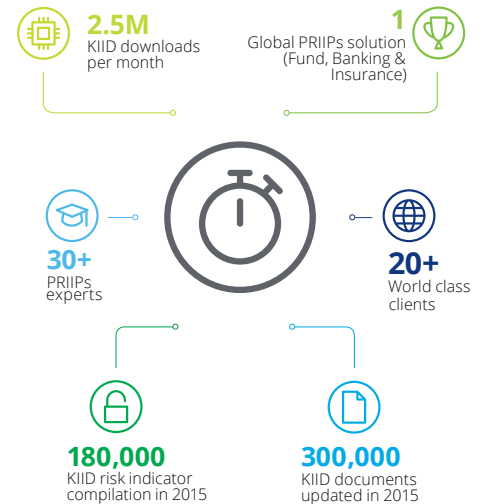
At Deloitte, we have developed a tailor-made solution for certain non-UCITS funds. We can help you benefit from an extended deadline for the PRIIPs regulation, subject to specific requirements.

## How Deloitte can help

- Assessment study to determine which type of non-UCITS funds could avail themselves of the exemption, and under which conditions
- Plug and play solution for UCITS KIID including production of KIID using our proven and successful KIID & Document Production Service
- Work with you to best prepare the move to PRIIPs KID by leveraging both the experience gained with our successful UCITS KIID factory and the important R&D efforts made in the past year on the topic of PRIIPs
- Deloitte's related cross-border distribution support services such as AIFMD distribution and reporting services, regulatory compliance and market intelligence
- Analyse, review, maintain your internet content, factsheets and marketing material to ensure compliance with country specific regulation

## Deloitte in numbers

Our proven track record – document production



## Contact us:

Please contact us for more information on how we can help you prepare and be ready for the PRIIPs challenge.

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