NORTON ROSE FULBRIGHT

Moving from PRIIPs to CCI

How Can We Help

Norton Rose Fulbright LLP – 2025



Contents

Where we are **3**

How we can help **4**

Our experience **5**
Contacts 5

Where we are

This section explores how the regulatory regime for retail investment products has developed in the UK. Retail investment products are a key focus area for the FCA and HMT within their growth and competitiveness strategy.

The FCA and HMT are seeking to implement a regulatory framework for retail investment products that empowers consumers by providing them with access to better information on retail investment products across the market, potentially leading to more investment activity by UK retail investors and greater competition among distributors and manufacturers of these products. These objectives are also balanced against the FCA and HMT's desire to ensure that consumers are still appropriately protected in relation to these types of retail investment products.

The current PRIIPS regime

The current Packaged Retail and Insurance-based Investment Products (PRIIPs) regime was introduced by the EU, and came into force in 2018. PRIIPs aims to enhance transparency and comparability for retail investors purchasing complex investment products.

Under the regime, manufacturers of PRIIPs must produce a standardised Key Information Document (**KID**), which provides clear, concise, and comparable information on product features, risks, costs, and potential returns, enabling retail investors to make informed decisions. The regime applies to both product manufacturers and distributors, who must ensure that KIDs are provided to retail investors before any transaction.

The FCA, post-Brexit, have made a number of amendments to the PRIIPs regime to address market criticisms (particularly on performance scenario and cost methodologies). In 2024, HMT and the FCA also introduced forbearance measures for investment trusts from the PRIIPs regime.

The new CCI regime

Following the introduction of the regulatory framework by HMT in 2024, the FCA is set to introduce a new Composite Consumer Investments regime (the CCI Regime), which is aiming to streamline and strengthen the regulatory framework for retail investment products in the UK.

The new CCI Regime places greater emphasis on consumer understanding, product governance, and the prevention of harm, aligning with the FCA's Consumer Duty. The new CCI regime will consolidate and replace the existing PRIIPs regime for retail investment products.

The new CCI regime introduces a replacement disclosure document to the pre-existing KID, and includes specific requirements on information flows between manufacturers and distributors.

The new CCI regime also introduces a light-touch version of the FCA's regulatory high-level principles and product governance rules for unauthorised manufacturers of retail investment products.

Next steps

The FCA published consultations on the new CCI Regime in December 2024 and April2025. The FCA's policy statement, which will include its final rules, is expected to be published in H2 2025, with the CCI regime fully coming into force some time across 2026 and 2027. There are transitional arrangements for firms that are within scope of the PRIIPS/CCI Regimes, which are due to last for between 12 and 18 months, depending on the type of product, following the introduction of the new CCI Regime.

How we can help

We are a leading financial services practice in the City that works closely with our risk advisory consultancy, making us an indispensable partner as your business navigates the introduction of the new CCI Regime. We can assist in understanding and meeting FCA's new requirements – including the new disclosure documentation and information flows between manufacturers and distributors. We can also assist with the implementation of any policies, procedures and/or systems that you may require to meet the new CCI Regime (for both authorised and unauthorised firms).

Impact assessments

We assist businesses in navigating the complex regulatory landscape by ensuring full compliance with the FCA's rules while meticulously identifying potential risks and unforeseen challenges that could adversely affect consumers, investors and the organisation itself. Our approach involves a proactive review of existing policies and practices, coupled with customised legal advice tailored specifically to the financial services sector, allowing companies to not only meet current regulatory requirements but also anticipate and adapt to future changes.

Key Information Document / Product Summary Document

We can assist firms in transitioning from the existing KID documentation under the PRIIPs regime to the new Product Summary Documents (**PSDs**) required under the CCI Regime. Following our extensive support to a range of firms across the retail investment market on the introduction of the Consumer Duty, we are well placed to assist firms in drafting their new PSDs to comply with the new CCI Regime requirements and the FCA's expectations on the Consumer Understanding outcome. We are also well placed to assist distributors in assessing their obligations in reviewing and amending PSDs produced by manufacturers, and in complying with their enhanced disclosure obligations under the CCI regime (as compared to the existing PRIIPs regime).

EMT / Core Information Template

We can assist manufacturers in producing their Core Information Template (**CIT**) document, which must be shared with distributors alongside the PSD for a retail investment product. We are well placed to advise manufacturers on the changes from the existing EMT/EPT templates used in the market for similar purposes, and how the CIT can comply with the FCA's form and content requirements under the CCI Regime. We can also assist distributors in understanding their obligations in relation to reviewing and using CIT's provided by manufacturers, as well as managing information flows relevant to this document on an ongoing basis.

Unauthorised manufacturers

We are well placed to assist unauthorised manufacturers making retail investment products available to retail investors in the UK in complying with the new CCI regime. Although unauthorised manufacturers do not require authorization with the FCA, under the UK's Designated Activities Regime, firms will still need to navigate compliance with FCA requirements. For example, we can assist unauthorised firms with the establishment of new policies and procedures and governance arrangements to comply with the FCA's Principles for Businesses, as well as compliance with the product governance and Consumer Duty related requirements flowing from the new CCI Regime.

Our experience

Overseas Retail Funds Manufacturers

Provided advice and assistance to several overseas manufacturers of retail funds on compliance with the PRIIPs regime, including the creation of Key Information Documents and European MiFiD/PRIIPs Template (EMT/EPT) documentation.

UK Fund Manufacturers

Advising UK manufacturers of retail investment products on compliance with the PRIIPS regime, including production of KID documents.

UK and EU Banks

Advising UK and EU Banks on compliance with the PRIIPS regime and divergence between the UK and EU regimes over time.

This has also included leveraging our PRIIPS KID Toolkit product to allow the Banks to easily prepare KIDs for a range of different retail investment products (i.e. structured products, derivatives, funds, bonds, etc).

Global Exchange

Advising a global exchange on compliance with the PRIIPs regime and disclosure requirements across the distribution chain.

Investment Trusts

Advising several investment trusts on the HMT/FCA forbearance measures relating to the publication of KIDs and compliance with MiFID II related costs and charges disclosures.

Industry involvement

We have liaised closely with a number of trade bodies in relation to the development of the new CCI regime, as well as the introduction of the Consumer Duty (and the development of industry approved approaches to information sharing across the retail distribution chain).

UK and Third-Country Retail Investment Firms

We have advised a number of UK and Third Country Retail Investment Firms on compliance with the UK's product governance requirements and the related 'Products and Services' outcome of the Consumer Duty. This has involved advice on practical compliance with these requirements and in establishing appropriate governance arrangements, and policies and procedures.

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