

Submission Date

10/10/2025

ESMA_QA_2662

Status: Forwarded to EC/Public Consultation/Other

Additional Information

Level 1 Regulation

Regulation (EU) 2019/2088 - Sustainable Finance Disclosure Regulation (SFDR)

Topic

Disclosures

Additional Legal Reference

Art 2.1(b)

Subject Matter

Investment firms' SFDR disclosure obligations

Question

In the case where a financial market participant, such as a fund manager (delegator), delegates the portfolio management of a fund to an investment firm (delegatee), is the

delegatee investment firm subject to the same SFDR disclosure obligations for the portfolio management it performs for that fund as when it deals with discretionary portfolio management mandates with end investors?