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ESMA Market Report

Costs and Performance of EU Retail Investment Products 2025

ESMA Market Report on Costs and Performance of EU Retail Investment Products 2025

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Executive summary

The European Securities and Markets Authority's 2025 Market Report on the Costs and Performance of EU Retail Investment Products provides an overview of key developments up to the end of 2024, a year characterised by improving returns compared to 2023.

Similarly to previous editions, this year's analysis covers undertakings for collective investment in transferable securities (UCITS), retail alternative investment funds (AIFs), and structured retail products (SRPs). In addition to the regular analysis, this report provides new analyses of active Exchange Traded Funds (ETFs) and European Long-Term Investment Funds (ELTIFs).

Significant data issues persist. For UCITS, entry and exit costs reported in the PRIIPs KIDs are still subject to limitations. Given these drawbacks we put more emphasis on ongoing costs in this edition of the report. In the case of AIFs, information on costs, while still being not exhaustive, improved substantially this year with 30% of the retail AIF sample covered (compared to 9% in the previous edition). For SRPs, costs are only available for a subset of products. Elsewhere, the information on costs do not include potential distribution costs.[1]

Investment funds – UCITS

Our sample covers UCITS assets worth around EUR 11.6tn, of which retail investors were estimated to hold around EUR 7.9tn in 2024, with an overall coverage of 92% of the EU UCITS market.

Ongoing costs in the EU continued to decline in 2024, especially for bond funds: for the one-year investment horizon, between 2020 and 2024 the ongoing costs of retail equity funds (ETFs excluded) declined by 8%, while the ongoing costs of retail bond funds (ETFs excluded) fell by almost 15%. This reduction is partially driven by new investment funds that tend to have lower ongoing costs, on average. The drop in costs for incumbent funds – i.e. share classes already offered in the preceding five years – is clearly lower: at the one-year investment horizon, the decrease was 3% for equity funds and 9% for bond funds.

Ongoing costs of ETFs decreased by 13% and 17% respectively for equity and bonds. Active ETFs report slightly higher costs than passive ETFs but lower costs than active funds.

Gross returns improved in 2024 and real net returns were positive, contrary to 2023. A hypothetical five-year investment of EUR 10,000 between 2020 and 2024, based on a stylised portfolio of UCITS, would yield around EUR 12,200 net of ongoing costs, but slightly below EUR 10,000 when considering the effect of inflation. Equity active funds underperformed in 2024 passive non-ETF funds and ETFs.

As in 2023, the ongoing costs of environmental, social and governance (ESG) funds are lower compared to non-ESG equivalents. ESG funds underperformed their non-ESG equivalents in 2024. Similarly, SFDR Article 9 funds underperformed funds disclosing under SFDR Article 6.

[1] Information on costs comes primarily from the PRIIPs KIDs whose focus is on product-level costs, including maximum entry and exit fees, ongoing management fees, transaction costs and potential performance fees. This framework excludes though explicit distribution-related costs paid by the investor directly to the distributor. These costs often represent a substantial portion of the total investment expense. The ESMA Market Report on total costs of investing in UCITS and AIFs demonstrated that distribution costs represent 48% of UCITS total costs. The lack of reporting on distribution costs constitutes therefore a limitation of the present report. For more information on distribution costs, please refer to ESMA Market Report on total costs of investing in UCITS and AIFs, November 2025.

Investment funds – retail AIFs

Alternative Investment Funds reached almost EUR 8tn in assets in 2024, of which just above EUR 700bn was estimated to be held by retail investors (retail AIFs). The share of retail investors decreased for the second consecutive year to 9% in 2024 compared to almost 14% in 2022. Around a quarter of the total retail investment in AIFs is concentrated in funds primarily focusing on traditional asset classes, such as equities and bonds.

Annualised returns of AIFs offered to retail investors significantly improved from 2023 to 2024 for Funds-of-Funds, while other AIFs and the rest of the market reported similar returns for the two years. Real estate funds reported slightly declining gross and net performances. A hypothetical five-year investment of EUR 10,000 between 2020 and 2024, based on a stylised portfolio of AIFs, would yield around EUR 11,700, net of fees, or EUR 9,500 when considering the effect of inflation.

The creation of new European Long-Term Investment Funds (ELTIFs) surged recently, with 62% of them being launched in 2024 or 2025. ELTIFs classified as private equity reported the stronger returns in 2024 (10%).

Structured retail products

Structured retail products (SRPs), with an outstanding value of EUR 392bn in 2024 (+8% from 2023), remain a much smaller market than UCITS and retail AIFs. Products referencing interest rates continued to grow. Their market share reached 27%, up from just 1% in 2021.

We provide an EU-wide analysis of performance scenarios and costs, drawing on commercial data. Costs – largely charged in the form of subscription fees – remained broadly stable in 2024 for most larger issuers, although they varied substantially by payoff type and country.

The analysis of performance scenarios shows limited differentiation between moderate and favourable scenarios as presented to retail investors in the Key Information Document. Overall, taking as a reference the return of the median SRP in the moderate scenario, a hypothetical five-year investment of EUR 10,000 undertaken in 2024 would yield around EUR 13,194, in net terms, at maturity. This figure increases to EUR 13,765 in a favourable scenario, but it drops to EUR 10,000 in an unfavourable scenario and EUR 1,519 in a stress scenario. SRPs that matured in 2024 consistently delivered positive returns in gross terms, but these figures do not consider the incidence of costs paid by investors.

Essential statistics – UCITS

UCITS

	Funds (non-ETF)			ETFs
Costs and performance (2020–2024)	Equity	Bond	Mixed	Equity
Costs (%, per annum (p.a.))	1.9	1.3	2.0	0.5
Ongoing charges	1.38	0.87	1.47	0.22
Subscription fees	0.51	0.41	0.42	0.18
Redemption fees	0.04	0.04	0.05	0.13
Net performance (%, p.a.)	7.5	0.0	2.7	10.1
Performance net of ongoing costs (%, p.a.)	8.0	0.4	3.1	10.4
Change in ongoing costs (%, 2020–2024)	-8.1	-14.7	-5.2	-10.9
Change in ongoing costs for balanced sample (%, 2020-2024)	-2.6	-9.0	-2.0	-10.2
Inflation (%, p.a.)	4.4	4.4	4.4	4.4
Real performance net of ongoing costs (%, p.a.)	3.6	-4.0	-1.3	6.0

ESG UCITS

	Funds (non-ETF)			ETFs
Costs and performance (2020–2024)	Equity	Bond	Mixed	Equity
Costs (%, p.a.)	1.9	1.2	2.0	0.6
Ongoing charges	1.31	0.70	1.53	0.25
Subscription fees	0.50	0.45	0.44	0.21
Redemption fees	0.05	0.03	0.04	0.19
Net performance (%, p.a.)	7.7	-0.4	2.1	9.2
Performance net of ongoing costs (%, p.a.)	8.3	0.1	2.6	9.5

Hypothetical UCITS portfolio performance

EUR 10,000 UCITS portfolio performance	10Y (2015–2024)	5Y (2020–2024)
Value net of ongoing costs (EUR)	15,530	12,207
Ongoing costs paid (EUR)	1,687	704
Inflation (EUR)	3,603	2,251
Real value net of ongoing costs (EUR)	11,927	9,956

Note: ESG, environmental, social and governance; ETF, exchange-traded fund; p.a., per annum; UCITS, undertakings for collective investment in transferable securities. UCITS – costs and performance for EU27 UCITS (ESG and non-ESG), for main retail investors' asset classes, at a five-year investment horizon between 2020 and 2024 (%); change in ongoing costs from 2020–2024 refers to the changes in ongoing costs for an investment horizon of one year as calculated at the end of 2020 and at the end of 2024; (%); change in ongoing costs from 2020–2024 for balanced refers to the changes in ongoing costs for an investment horizon of one year as calculated at the end of 2020 and at the end of 2024 for a sample of funds present in all years since 2020. ESG UCITS – costs and performance for EU27 ESG UCITS for main retail investors' asset classes, at a five-year investment horizon between 2020 and 2024 (%). The definition of ESG funds relies on the Morningstar definition of a sustainable investment fund, which classifies a product as a sustainable investment "*if the use of one or more approaches to sustainable investing is central to the investment product's overall investment process, based on its prospectus or other regulatory filings*" (Morningstar, Morningstar Sustainable Attributes – Framework and definitions for the 'Sustainable Investment' and 'Employs Exclusions' attributes, August 2022). Hypothetical UCITS portfolio performance – value of hypothetical EUR 10,000 after 10 years and 5 years, for retail investors (in euro). Statistics presented in this report cover the period after the withdrawal of the United Kingdom from the EU on 31 January 2020. Comparisons with the statistics published in the first three editions are, therefore, limited.

Essential statistics – AIFs, SRPs

Retail AIFs

Performance (2020–2024)	FoFs	Other AIFs	RE	RoM
Gross performance (%, p.a.)	3.1	5.2	2.7	2.8
Net performance (%, p.a.)	2.5	4.5	1.6	2.3

Hypothetical AIFs portfolio performance

EUR 10,000 AIF portfolio performance over time	1Y (2024)	5Y (2020–2024)
Gross value (EUR)	10,670	12,064
Net value (EUR)	10,558	11,627
Inflation (EUR)	268	2,144
Net real value (EUR)	10,290	9,585

Structured Retail Products

Performance scenarios	Stress	Unfavourable	Moderate	Favourable
Simulated net return (core 50% of products, % p.a.)	-41 to -20	-17 to 5	4 to 8	5 to 9
Costs				
Summary cost indicator (median product, % p.a.)		0.8		

Hypothetical SRPs performance

EUR 10,000 SRP performance (simulated returns)	1Y	5Y
Net value (EUR) in the stress scenario	3,080	1,519
Net value (EUR) in the unfavourable scenario	8,641	10,000
Net value (EUR) in the moderate scenario	10,460	13,194
Net value (EUR) in the favourable scenario	10,774	13,765

Note: AIF, alternative investment fund; FoF, fund of funds; p.a., per annum; RE, real estate; RoM, rest of the market; SRP, structured retail products. Retail AIFs − annualised monthly gross and net performance of retail AIFs in the 30 European Economic Area countries, by fund type (%). 'Other AIFs' = fixed income funds, equity funds, infrastructure funds, commodity funds and other funds; RoM = rest of the market and includes hedge funds, private equity and those funds whose type is not indicated; no cost reporting available from regulatory data sources. Hypothetical AIFs portfolio performance − value of hypothetical EUR 10,000 after 5 years, for retail investors (in euro). Structured Retail Products − forecasts of performance and costs for SRPs (%). Figures for performance refer to the interquartile range (25th and 75th percentiles) of potential per annum returns over the product's recommended holding period under four scenarios: stress, unfavourable, moderate and favourable. Figures for costs are the median summary cost indicator per annum over a product's recommended holding period. Hypothetical SRPs performance – value (in euro) of hypothetical EUR 10,000 based on the median of potential returns after 1 year (assuming early exit) and 5 years (assuming this is the product's recommended holding period or maturity) under the stress, unfavourable, moderate and favourable PRIIPs KIDs scenarios. Being based on hypothetical periods, these projections do not consider the effect of inflation. Statistics presented in this report cover the period after the withdrawal of the United Kingdom from the EU on 31 January 2020. Comparisons with the statistics published in the first three editions are, therefore, limited.

Market monitoring

Market environment in 2024

The European financial market environment improved in 2024, amid decreasing inflation and loosening monetary policy. Returns in the equity markets were positive in 2024, yet heterogenous across regions. While the returns of the S&P 500 and Nikkei 225 were above 20%, the performance in the euro area (i.e., EURO STOXX 50) reached 12%. Corporate bond yields decreased in 2024, especially for bonds of lower credit quality. After peaking at the beginning of 2024, sovereign bond yields declined in the following months and rose again from the beginning of October.

MR-CP.1

EU Harmonised Index of Consumer Prices inflation

Decline of inflation and heterogeneity in the EU

Note: EU27 HICP monthly inflation dispersion, %.
Sources: Eurostat, ESMA.

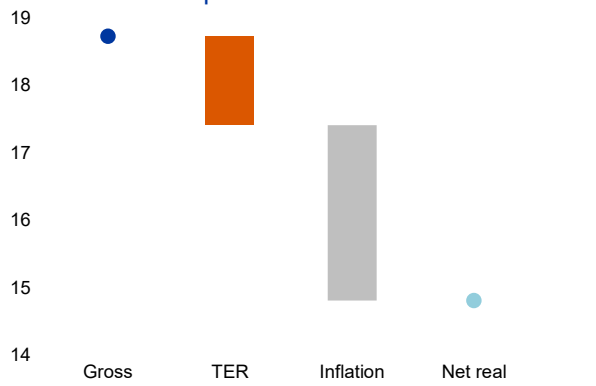
Even though some increases can be observed, inflation receded overall in the EU in 2024, reaching 2.7% at the end of 2024 (MR-CP.1). In parallel, the disparities observed across EU Member States reduced, with the spread between the highest and lowest inflation rates slightly receding from 6.4 percentage points (pp) in January to 4.5pp in December 2024. The inflation is expected to recede further in the years to come (2.5% in 2025 and 2.1% in 2026), according to the European Commission's Autumn 2025 economic forecast.[2]

Although inflation declined in 2024, it continues to have a significant impact on final investment outcomes, especially in the short term. At the one-year investment horizon (MR-CP.2), inflation reduced investor real return by more than 2pp. Inflation weighted more on real return than ongoing costs[3] (2.6% vs 1.3% for an investment in equity undertakings for collective investment in transferable security (UCITS)).

MR-CP.2

Equity funds' real net performance at the 1Y horizon

Positive net real performance in 2024



Note: EU27 UCITS equity funds annual performance classified as gross performance (dark blue dot), ongoing costs (TER, orange bar) and inflation (grey bar) and net real performance (sky blue dot). Retail investors, 1Y horizon, %.
Sources: Refinitiv Lipper, Morningstar direct, Eurostat, ESMA.

Inflation, if not properly factored in, could pose risks to consumers and retail investors. The impact of inflation can be underestimated or overlooked by retail investors, who may overestimate the real value of their savings and investments. This can lead to insufficient savings, excessive spending or ill-judged allocation of capital, all of which will have detrimental effects on investors' long-term wealth.

[2] European Commission, Autumn 2025 Economic Forecast shows continued growth despite challenging environment, November 2025.

[3] Inflation and costs are however two distinct concepts. Costs vary form one fund to another depending on its characteristics while Inflation is a factor that is exogenous to all financial market participants (investors, fund managers, etc.) and common to all investments.

Investment funds – UCITS

Summary

Our sample covers UCITS assets worth around EUR 11.6tn, of which retail investors were estimated to hold around EUR 7.9tn in 2024, with an overall coverage of 92% of the EU UCITS market.

Ongoing costs in the EU continued to decline in 2024, especially for bond funds: for the one-year investment horizon, between 2020 and 2024 the ongoing costs of retail equity funds (ETFs excluded) declined by 8%, while the ongoing costs of retail bond funds (ETFs excluded) fell by almost 15%. This reduction is partially driven by new investment funds that tend to have lower ongoing costs, on average. The drop in costs for incumbent funds – i.e. share classes already offered in the preceding five years – is clearly lower: at the one-year investment horizon, the decrease was 3% for equity funds and 9% for bond funds.

Ongoing costs of ETFs decreased by 13% and 17% respectively for equity and bonds. Active ETFs report slightly higher costs than passive ETFs but lower costs than active funds.

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As in 2023, the ongoing costs of environmental, social and governance (ESG) funds are lower compared to non-ESG equivalents. ESG funds underperformed their non-ESG equivalents in 2024. Similarly, SFDR Article 9 funds underperformed funds disclosing under SFDR Article 6.

Market overview

At the end of 2024, the EU UCITS segment remained the largest fund investment sector in the EU, with EUR 12.6tn in assets.[4] In this ESMA Market Report, we cover 92% of the EU UCITS market as reported by the European Fund and Asset Management Association (EFAMA): a total of EUR 11.6tn, of which EUR 7.9tn was estimated to be held by retail investors.[5] Excluding exchange-traded funds (ETFs), our sample covers assets worth around EUR 9.7tn, of which retail investors held around EUR 6.1tn in 2024 (AMR-CP-S.48).

Two countries (Croatia and Romania) are not covered at all by our commercial data. For the rest of the countries, the coverage can vary widely. While we cover less than 50% of the market for 7 countries, the coverage is above 90% for 8 countries (MR-CP.3).[6]

[4] EFAMA, 'Trends in the European investment fund industry in the fourth quarter of 2024 & results for the full year 2024', Quarterly Statistical Release, No 100, Table 1, p. 12. Only Member States were included.

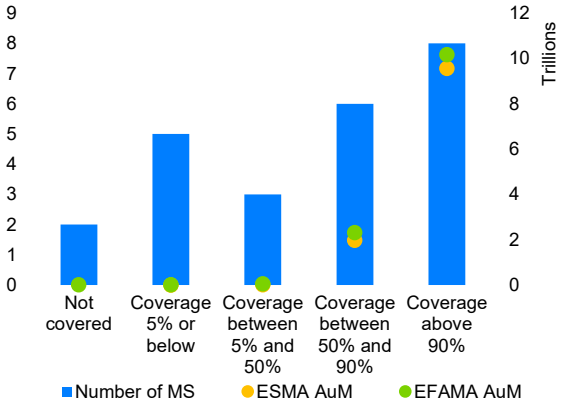
[5] Refinitiv Lipper accounts for share classes declaring themselves institutional. If the share class does not declare itself institutional, the share class is considered retail. Therefore, high net-worth investors can still count as retail. This potentially means a downward bias in the size of the market for institutional investors, especially for domiciles characterized mainly by non-retail investors. In addition, any changes in share classes' self-declared institutional status may influence year-on-year comparability of the data.

[6] Estonia, Latvia and Lithuania are not covered by EFAMA statistics, and we are therefore unable to assess the coverage reached for these countries.

MR-CP.3

Coverage by country

Disparity of coverage



Note: Number of EU jurisdictions by degree of coverage (lhs) and sum of assets under management for the corresponding countries (rhs), in EUR tn. Estonia, Latvia and Lithuania are not covered by EFAMA statistics and therefore not reported in this chart.

Sources: Refinitiv Lipper, Morningstar Direct, EFAMA, ESMA.

Europe, with 30% of global net assets, is the second largest market globally in terms of open-ended regulated funds, after the United States (US), which holds more than 50% of global net assets.[7] In our sample, in 2024, retail investors were estimated to hold almost 69% of the total outstanding EU UCITS assets. This is lower than the share in the US, where households held 88% of the total net assets of US mutual funds at the end of 2024.[8] Similarly to previous years, EU investment funds remain, on average, much smaller than US funds.[9] This can, at least partially, explain the substantial differences in the fund cost levels between the EU and the US.[10]

More than 90% of retail investment centres on equity, bond and mixed assets (AMR-CP-S.50), which are the focus of this report. The distribution of retail investment across these assets is heterogeneous in the EU. For example, in 2024, the share of investment mainly focusing on equity was 14% in Italy, while it was around 68% in the Netherlands (AMR-CP-S.53).

The number of funds marketed and sold cross-border in the EU decreased in 2024 compared to 2023 and it remains smaller than that of funds sold exclusively domestically (AMR-CP-S.58).[11]

In terms of assets, however, funds effectively sold cross border accounted for 57% of the total EU UCITS funds (AMR-CP-S.57).[12]

Costs and performance

EU aggregate fund costs: continued decline driven by new funds

In line with the trends reported in previous editions, the entry of new funds in 2024 participates to an overall decline in ongoing costs. Table MR-CP.4 details the decline in prices across fund categories for retail investors.

For equity UCITS, ongoing costs for investments over the one-year horizon in this year's edition (for 2024) are lower than those in 2020 (-8%) and in 2023 (-2%). We can draw similar conclusions for the five and ten-year investment horizons.

For bond funds, the reduction in costs was limited between this edition and the previous one for the one-year investment horizon (-1%), but it reached almost 15% between this edition and the edition published five years ago (for 2020).

For mixed funds however, the reduction appears to be more limited, especially when comparing one year to the next (-1%).

If only funds included in the sample in all years between 2020 and 2024 are considered, the observed decline over the past five years is much lower especially for equity and mixed funds. The decrease amounts to 2.6% for equity funds, 9% for bond funds and 2% for mixed funds.

While the decline of ongoing costs appears significant when comparing this edition of the report with the 2020 edition, it becomes however limited from one year to the next. While the regressions (AMR-CP-S.1) show that 2020 costs were, on average, higher than the costs charged in 2024, the difference of ongoing costs between 2023 and 2024 is not significant.

7 EFAMA, 'Worldwide regulated open-end fund assets and flows – Trends in the fourth quarter of 2024', International Quarterly Statistics, March 2025, Exhibit 7.

8 Investment Company Institute, Investment Company Factbook – A review of trends and activities in the investment company industry, 2025, p. 51.

9 EFAMA, 'Worldwide regulated open-end fund assets and flows – Trends in the fourth quarter of 2024', International Quarterly Statistics, March 2025, Tables 2 and 4. In 2024, a US fund held an average of EUR 3,502mn in assets, while an EU fund held around EUR 419mn.

10 ESMA, 'The scale factor: impact of size on EU fund cost structures', March 2025.

11 For the purpose of this report, a cross-border fund is defined as a fund sold in at least two countries in addition to the fund domicile country.

12 This share increases to 61% if we consider funds that were registered to be marketed cross-border but did not get sold across borders.

MR-CP.4

UCITS ongoing costs across periods

Costs continue to decline

	2020	2021	2022	2023	2024
			Equity UCITS		
			Ongoing costs		
1Y	1.44	1.41	1.39	1.35	1.32
5Y	1.51	1.47	1.44	1.41	1.38
10Y	1.59	1.56	1.53	1.50	1.46
			Subscription and redemption fees (*)		
1Y	3.01	2.84	2.76	2.57	2.48
5Y	0.65	0.63	0.60	0.57	0.55
10Y	0.35	0.34	0.33	0.32	0.30
			Bond UCITS		
			Ongoing costs		
1Y	0.95	0.90	0.88	0.82	0.81
5Y	0.98	0.96	0.94	0.91	0.87
10Y	1.04	1.02	1.00	0.97	0.94
			Subscription and redemption fees (*)		
1Y	2.49	2.48	2.38	2.02	1.93
5Y	0.52	0.51	0.50	0.48	0.45
10Y	0.28	0.27	0.27	0.26	0.25
			Mixed UCITS		
			Ongoing costs		
1Y	1.52	1.49	1.47	1.45	1.44
5Y	1.54	1.53	1.51	1.49	1.47
10Y	1.55	1.55	1.54	1.53	1.52
			Subscription and redemption fees (*)		
1Y	2.57	2.52	2.43	2.19	2.10
5Y	0.54	0.53	0.51	0.49	0.47
10Y	0.29	0.28	0.28	0.27	0.26

(*) For subscription and redemption fees, the data report the maximum level for each fund share class, in line with regulatory requirements. However, the actual entry and exit fees are subject to negotiations among parties and can be significantly lower than those reported (please see box MR-CP.8). An update of the methodology led to a significant change in the figures displayed for the subscription and redemption fees compared to the editions prior to 2024.

Note: EU27 UCITS ongoing costs, subscription and redemptions fees, by investment horizon and asset type, geometric mean aggregation, active and passive non-ETF funds, retail investors, %. Periods: 2024 covers the 2015–2024 reporting period, 2023 covers the 2014–2023 reporting period, 2022 covers the 2013–2022 reporting period, 2021 covers the 2012–2021 reporting period and 2020 covers the 2011–2020 reporting period. The figures for the years 2020 to 2023 are different from the ones displayed in the previous editions of this report. For those years, the average costs have been recalculated with 2024 characteristics applied retroactively. This allows for a better comparison across years.
Sources: Refinitiv Lipper, Morningstar Direct, ESMA.

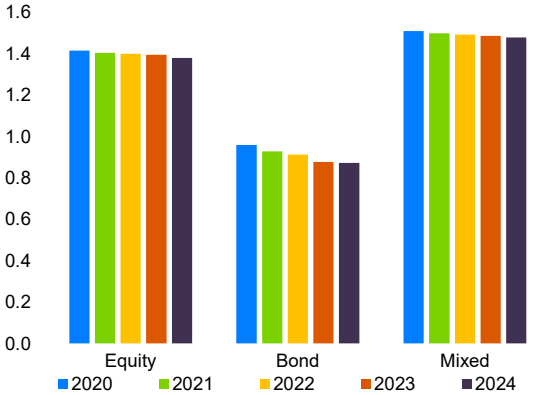
The decline of costs can be partially attributed to sample composition effects as some share classes could have been merged or liquidated since 2020, while some newly launched share classes were recently included in the sample.

Looking in more details at the evolution of costs, we observe that the share classes present for the past 5 years or more didn't report, on average, a significant change in their ongoing costs year after year, except for bond funds (MR-CP.5). The regressions (AMR-CP.-S.2) show that the difference of ongoing costs between 2023 and 2024 for the share classes present for the past 5 years or more is not significant.

MR-CP.5

Ongoing costs by asset class for balanced sample

Limited adjustment of costs for equity and mixed



Note: EU27 UCITS ongoing costs, by asset type, geometric mean aggregation, active and passive non-ETFs, retail investors, %. Sample reduced to share classes continuously present in the sample since 2020.
Sources: Refinitiv Lipper, Mornigstar Direct, ESMA.

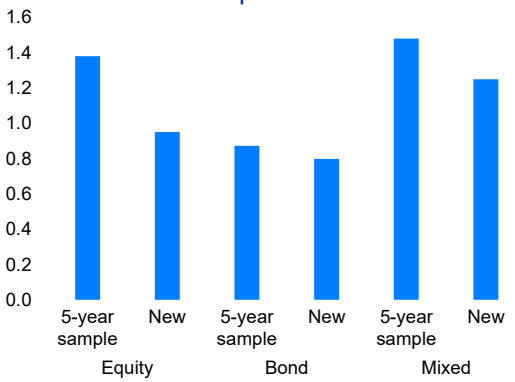
The difference of ongoing costs between 2020 and 2024 is significant and indicates a decrease of costs but of limited magnitude (2 basis points on aggregate for the three asset classes).

On the other hand, share classes entering the sample in 2024 disclose, on average, lower costs than share classes present since 2020 (MR-CP.6). The difference of ongoing costs between the share classes present for the past 5 years or more and the new share classes (i.e., share classes included in the sample since 2024) is significant and is around 5bps on average in 2024 for the three asset classes considered (AMR-CP-S.6).

MR-CP.6

Ongoing costs by age

New funds are cheaper



Note: EU27 UCITS ongoing costs, by asset type, geometric mean aggregation, active and passive non-ETF, retail investors, %. Sample split between share classes continuously present in the sample since 2020 ("5-year sample") and share classes only present in the sample in 2024.

Several differences can be observed between the new share classes and the ones present in all years between 2020 and 2024. First, regarding the domicile, while Luxembourg is by far the first country of domiciliation followed by Ireland in both samples, the proportions diverge. For the share classes present each year since 2020, Luxembourg dominates, with a share of 63%, followed by Ireland (16%). For the new share classes, while Luxembourg is still the first country of domiciliation, the difference between Luxembourg and Ireland is more narrow (respective share at 48% and 22%). Secondly, new share classes invest more globally (61% vs 50%) and tend to be less invested in specific areas. Also, the proportion of ESG funds[13] is higher among new share classes (24% vs 16%). As demonstrated in the next sections of the report, those three dimensions (i.e., domicile, strategy, sustainable features) can have an impact on the level of costs.

Similar to what was observed in the previous editions, the results of the regression analysis show that domestic UCITS have, on average, lower ongoing costs than cross-border funds (AMR-CP-S.1).[14] This is a likely consequence of the adjustments required when marketing funds in another Member States. For instance, the treatment of distribution costs varies across Member States: they may be included within one-off costs or ongoing costs. Hence, the PRIIPs KIDs may need to be adapted to the rules of the targeted market. A translation of the regulatory and marketing documents may also be required. In addition, as demonstrated in the ESMA Market Report on total costs of investing in UCITS and AIFs, the distribution channels vary widely across jurisdictions.[15] This may require for the funds' manufacturers to look for new distributors already implanted in the local market. All of these adjustments can therefore weight on the costs.

While the average ongoing costs are declining across years, the dispersion of ongoing costs[16] remains steady (MR-CP.7).

[13] We rely on the Morningstar definition of sustainable investment fund. Morningstar classifies a product as a sustainable investment 'if the use of one or more approaches to sustainable investing is central to the investment products overall investment process based on its prospectus or other regulatory filings' (see Morningstar, Morningstar Sustainable Attributes – Framework and definitions for the 'sustainable investment' and 'employs exclusions' attributes, August 2022). We use the latest available information as of July 2025.

[14] It should be noted however that the ESMA Market Report on total costs of investing in UCITS and AIFs show that the marketing type is a weak driver of ongoing costs, as the difference of costs between domestic and cross-border funds is statistically significant only at 10% confidence level.

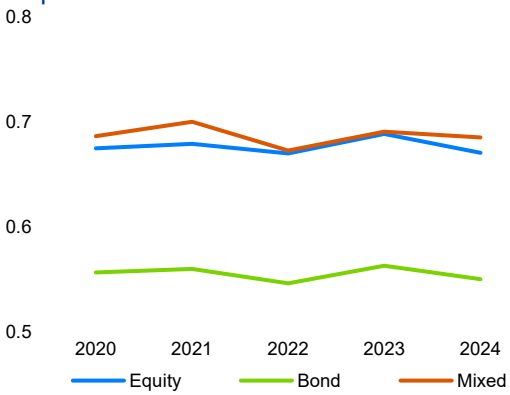
[15] ESMA Market Report on total costs of investing in UCITS and AIFs, November 2025.

[16] We measure the dispersion with the standard deviation. The standard deviation of quarterly ongoing costs is first calculated. Then the yearly figure is obtained through a simple mean.

MR-CP.7

Dispersion of ongoing costs for active funds

Dispersion of costs remains stable



Note: Standard deviation of EU27 UCITS active retail ongoing costs, by asset type.
Sources: Refinitiv Lipper, Morningstar Direct, ESMA.

The subscription and redemption costs as reported in PRIIPs KIDs reached on average 2.1% for retail UCITS. They are, on average, higher for equity funds (MR-CP.4). However, those figures are subject to limitations (MR-CP.8).

MR-CP.8

Entry and exit costs for UCITS

Actual one-off costs not always known

As stated in previous editions of this report, the PRIIPs KIDs disclose the maximum entry and exit costs that can be charged to investors. This is the main information we can get from our commercial providers regarding one-off costs and the actual level of entry and exit costs charged to investors is unknown to us.

The actual one-off costs may also be unknown from funds' manufacturers as they are not necessarily the ones collecting those fees. In some cases, the entry and exit costs are levied directly by the funds' distributors, without the manufacturer being able to know the actual level of costs charged.

The ESMA Market Report on total costs of investing in UCITS and AIFs[17] shows that when the funds' manufacturer is the one charging the one-off fees, the actual amounts are between 38% and 96% lower than the maximum levels disclosed in the PRIIPs KIDs.

Given this uncertainty about the actual level of entry and exit costs charged to investors and the focus of this report on manufacturers' costs, we've decided for now on to put more emphasize on ongoing costs, whose PRIIPs KIDs disclosure corresponds to the actual level for the previous year. Hence, the net performance displayed subsequently in this report should always be understood as the performance net of ongoing costs.

EU aggregate fund performances: high variability at one-year horizon

While costs only moderately change over time, performance[18] is highly volatile. Returns strongly progressed in 2024 compared to the previous year. This translated into improved returns for UCITS (MR-CP.9).[19]

The highest returns were observed for equity funds, with an average annual net performance of 17.4% in 2024. The annual net performance of bond and mixed funds for 2024 also increased (at respectively 6.9% and 10.9%). In 2024, the returns over the four quarters were positive with little variability from one quarter to another.

As already highlighted in previous editions of the report, the volatility of returns considerably drops over longer horizons. For instance, at the one-year investment horizon between 2023 and 2024, returns for equity funds improved by 11pp, while the difference in returns at the ten-year investment horizon for the same period reached only 0.5pp. A similar phenomenon can be noticed for bond and mixed funds, albeit at a lower scale. Long-term investment can smooth out the volatility in performance and the exposure to more extreme events. The impact of one-off costs can also be distributed over a longer period.

[17] ESMA Market Report on total costs of investing in UCITS and AIFs, November 2025.

[18] Performances by time horizon are obtained through a geometric average of annual performances (annual performances moving quarterly) across time.

[19] As in previous editions of this report, the investment horizon analysis is calculated as an average of annual performances at the end of all the four quarters of the year.

MR-CP.9

UCITS net annual performance across periods

Strong volatility driven by gross performance

	2020	2021	2022	2023	2024
			Equity UCITS		
1Y	0.1	31.2	-10.2	6.2	17.4
5Y	4.3	10.6	5.2	6.5	8.0
10Y	6.5	9.7	7.8	7.1	7.6
			Bond UCITS		
1Y	-1.1	4.4	-7.6	0.3	6.9
5Y	1.1	1.6	-0.3	0.2	0.4
10Y	2.8	3.1	1.4	1.2	1.4
			Mixed UCITS		
1Y	-1.5	13.7	-8.1	2.1	10.9
5Y	0.9	3.8	1.0	1.9	3.1
10Y	3.1	4.5	3.0	2.6	2.9

Note: EU27 UCITS annual performance net of ongoing costs, by asset type and investment horizon, geometric mean aggregation, retail investors, %. Periods: 2024 covers the 2015–2024 reporting period, 2023 covers the 2014–2023 reporting period, 2022 covers the 2013–2022 reporting period, 2021 covers the 2012–2021 reporting period and 2020 covers the 2011–2020 reporting period. The figures for the years 2020 to 2023 are different from the ones displayed in the previous editions of this report. For those years, the average net performances have been recalculated with 2024 characteristics applied retroactively. This allows for a better comparison across years.
The investment horizon analysis is calculated as an average of annual performances at the end of all four quarters of the year.
Sources: Refinitiv Lipper, Morningstar Direct, ESMA.

A hypothetical ten-year investment of EUR 10,000 between 2015 and 2024, based on a stylised portfolio composed of equity (40%), bond and mixed funds (30% each),[20] would yield around EUR 15,500 net of ongoing costs. Over those ten years, approximately EUR 1,700 would have been paid in ongoing costs.[21] This is almost twice the amount that an institutional investor would have paid if they had adopted the same strategy with the same initial investment. As a consequence, the net outcome would have been higher for the institutional investors (around EUR 16,400). This simulation illustrates the substantial impact fund costs have on the final outcome of an investment for a consumer.[22]

The costs and performance can also be very heterogeneous according to the investment strategy of the fund (geographical focus, main sector of investment etc.). As shown by tables AMR-CP-S.161, AMR-CP-S.162 and AMR-CP-S.163, equity funds focusing on large caps tend to have lower ongoing costs compared to other equity strategies. In the equity segment, the average ongoing costs range between 0.5% and 2% across strategies. The performance is also highly variable, ranging, over the one-year investment horizon, from 1.6% to 30.5% in gross terms.

Inflation: significant impact on real investment value

After reaching its peak in 2022, the inflation at one-year investment horizon continued to recede but it remains high compared to the levels experienced until 2020 (MR-CP.10). Since 2021, the investment environment changed with a significant impact on the final value of investments. Therefore, retail investors need to anticipate the consequences of these new macroeconomic conditions on their savings.

[20] The portfolio composition mirrors the distribution of retail investment between equity funds (41% in 4Q24), bond funds (27% in 4Q24) and mixed funds (24% in 4Q24). See AMR-CP-S.50.

[21] For more details on the methodology applied to obtain those figures, please refer to the statistical methods section in the annexes.

[22] Trading and distribution costs could not be accounted for due to the limited information available. However, these costs should not be disregarded by individual investors, who largely rely on financial institutions for access to financial products and to related information.

MR-CP.10

EU inflation across periods

Inflation increased from 2021

	2020	2021	2022	2023	2024
1Y	0.7	2.9	9.2	6.4	2.6
5Y	1.1	1.7	3.2	4.1	4.4
10Y	1.3	1.3	2.0	2.5	2.7

Note: EU27 inflation by investment horizon, mean aggregation, (%). Periods: 2024 covers the 2015–2024 reporting period, periods: 2023 covers the 2014–2023 reporting period, 2022 covers the 2013–2022 reporting period, 2021 covers the 2012–2021 reporting period and 2020 covers the 2011–2020 reporting period.
Sources: Eurostat, ESMA.

With increased net returns in 2024, real net returns for 2024 over the one-year investment horizon progressed significantly for the three asset classes considered. After one year of holding, the real net return stood at 14.8% for equity funds and 4.3% for bond funds (MR-CP.11). Real net returns over the one-year investment horizon were positive for the three asset classes considered after two years of negative real net returns.

Taking the effect of inflation into account, the same ten-year investment of EUR 10,000 considered above yields, in real terms, approximately EUR 12,000, after ongoing costs and inflation. Inflation thus decreases the net value by around EUR 3,600.[23] This hypothetical portfolio, however, yields a higher performance than what would have been obtained with a current account. Assuming no fees and a 0% yield, a banking account with EUR 10,000 would be worth EUR 10,000 after 10 years, in net terms. Taking into account inflation, the banking account would be worth EUR 7,700 after ten years.

MR-CP.11

UCITS real net annual performance across periods

Strong volatility driven by gross performance

	2020	2021	2022	2023	2024
			Equity UCITS		
1Y	-0.6	28.3	-19.4	-0.2	14.8
5Y	3.2	8.9	2.0	2.4	3.6
10Y	5.2	8.4	5.8	4.7	4.9
			Bond UCITS		
1Y	-1.8	1.5	-16.8	-6.1	4.3
5Y	0.0	-0.1	-3.5	-3.9	-4.0
10Y	1.5	1.8	-0.6	-1.3	-1.3
			Mixed UCITS		
1Y	-2.2	10.8	-17.3	-4.3	8.3
5Y	-0.2	2.1	-2.2	-2.2	-1.3
10Y	1.8	3.2	1.0	0.1	0.2

Note: EU27 UCITS real annual net performance (net of ongoing costs), by asset type and investment horizon, geometric mean aggregation (%). Periods: 2024 covers the 2015–2024 reporting period, periods: 2023 covers the 2014–2023 reporting period, 2022 covers the 2013–2022 reporting period, 2021 covers the 2012–2021 reporting period and 2020 covers the 2011–2020 reporting period. The figures for the years 2020 to 2023 are different from the ones displayed in the previous editions of this report. For those years, the average net performances have been recalculated with 2024 characteristics applied retroactively. This allows for a better comparison across years.
Sources: Refinitiv Lipper, Morningstar Direct, Eurostat, ESMA.

[23] It should be noted that inflation is a factor that is exogenous to all financial market participants (investors, fund managers, etc.) and common to all investments.

Costs and performance by risk

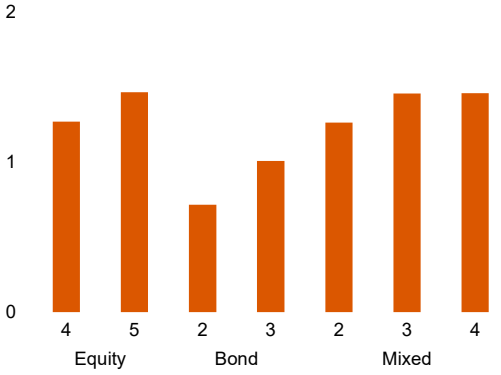
We analyse performance and costs accounting for differences in the level of risk within each asset class based on the PRIIPs summary risk indicator (SRI).[24] For each asset, UCITS are grouped by risk class based on the SRI classification from 1 to 7 with 1 indicating the lowest risk category and 7 the highest. As in the previous edition, assets were invested for the largest part in equity funds belonging to PRIIPs SRI classes 4 (78% of equity UCITS) and 5 (17% of equity UCITS). Bond funds were also grouped into a few SRI classes (i.e., SRI classes 2 and 3) while mixed funds were mostly concentrated between 3 SRI classes (i.e., SRI classes 2, 3 and 4).

Across asset classes, riskier funds are associated with higher ongoing costs. This is visible on chart MR-CP.12 and confirmed by the regressions (AMR-CP-S.7 to AMR-CP-S.9).

MR-CP.12

UCITS ongoing costs by SRI

Riskier funds are more expensive



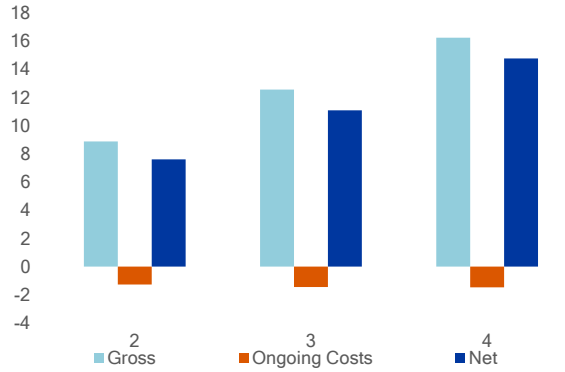
Note: EU27 UCITS equity, bond and mixed fund shares ongoing costs (TER), retail investors, by PRIIPs SRI class, one-year investment horizon, 2024, %. SRI risk classes and asset classes on the horizontal axis and ongoing costs in the vertical axis.
Sources: Morningstar Direct, Refinitiv Lipper, ESMA.

For mixed funds, funds in higher risk classes are associated with higher gross and net performance (despite higher costs; MR-CP.13). This is related to the higher returns of equities compared to bonds observed in 2024. Mixed funds mainly invested in equity should disclose better returns than mixed funds mainly invested in bonds but should also be assigned with a higher risk class. A similar picture can be drawn for bond funds with more risky investments (e.g., high yields) leading to higher returns. Contrary to 2023, the higher costs for bond funds belonging to the risk class 3 don't entirely compensate for the higher returns, allowing funds from this category to perform better, also in net terms. The conclusion for equity funds is more nuanced as funds belonging to risk classes 4 and 5 had, on average, similar gross and net performance in 2024.

MR-CP.13

Mixed UCITS total costs and performance

Riskier funds have higher performance



Note: EU27 UCITS mixed fund shares annual gross returns, returns net of ongoing costs, and ongoing costs, retail investors, by PRIIPs SRI risk class, one-year investment horizon, 2024, %.
Sources: Morningstar Direct, Refinitiv Lipper, ESMA.

Costs and performance by management type

The EU UCITS ETF segment increased in 2024, reaching EUR 1.9tn in 4Q24 (AMR-CP-S.63). The share of ETFs in the total EU UCITS grew as well, from 16% in 2023 to 20% at the end of 2024[25]. At the end of 2024, 76% of EU UCITS ETFs were invested in equity, 23% in bonds and the residual 1% in other assets (AMR-CP-S.64). Net annual inflows in equity ETFs increased in 2024, from EUR 77bn in 2023 to EUR 179bn in 2024, while net annual inflows into bond ETFs

[24] Commission Delegated Regulation (EU) 2017/653 of 8 March 2017 supplementing Regulation (EU) No 1286/2014 of the European Parliament and of the Council on key information documents for packaged retail and insurance-based investment products (PRIIPs) by laying down regulatory technical standards with regard to the presentation, content, review and revision of key information documents and the conditions for fulfilling the requirement to provide such documents. The SRI aims to provide investors with a meaningful indication of the risks of PRIIPs and of the different degrees of risk within the same asset class. Details on its methodology can be found in Annex II to the regulation.

From January 2023, it replaces the UCITS synthetic risk and reward indicator, whose methodology is reported in *CESR's guidelines on the methodology for the calculation of the synthetic risk and reward indicator in the key investor information document*.

[25] The sample includes both retail and institutional investors. The analysis is performed similarly to that for UCITS non-ETFs.

slightly declined in 2024 (EUR 41bn) compared to 2023 (EUR 48bn; AMR-CP-S.65).

In our sample, passive equity and bond UCITS non-ETFs accounted for EUR 548bn and EUR 174bn respectively – or 16 and 7% of equity and bond UCITS (excluding ETFs)[26]. Active equity UCITS assets were at EUR 2.9tn and bond UCITS at EUR 2.4tn at the end of 2024 (AMR-CP-S.67 and AMR-PCP-S.68). Only equity active funds recorded negative net flows (EUR -132 bn) in 2024. In the equity segment, ETFs recorded the highest net flows in 2024 (EUR 179bn for ETFs and EUR 11bn for passive non-ETFs). Active bond funds recorded in 2024 higher net flows than passive non-ETF or bond ETFs (EUR 145bn compared to respectively EUR 12bn and EUR 41bn).

In the equity UCITS market segment, the share of passive UCITS non-ETFs and UCITS ETFs continued to grow, reaching 41% in 4Q24. In the bond segment, the share of passively managed funds remained unchanged at 20% (AMR-CP-S.67 and AMR-CP-S.68).

MR-CP.14

UCITS costs and net performance by management type

Passive funds are on average about 60–80% cheaper than active funds

	Active funds		Passive funds		ETFs	
	1Y	10Y	1Y	10Y	1Y	10Y
			Ongoing costs			
			Equity UCITS			
2020	1.37	1.54	0.25	0.37	0.24	0.32
2021	1.33	1.50	0.24	0.34	0.23	0.31
2022	1.31	1.46	0.24	0.32	0.23	0.29
2023	1.29	1.43	0.22	0.30	0.22	0.27
2024	1.28	1.39	0.22	0.28	0.21	0.26
			Bond UCITS			
2021	0.76	0.89	0.14	0.24	0.23	0.25
2022	0.74	0.87	0.13	0.22	0.23	0.25
2023	0.70	0.84	0.12	0.19	0.20	0.25
2024	0.70	0.81	0.12	0.17	0.19	0.24
			Net performance			
			Equity UCITS			
2020	0.1	6.6	-0.5	7.9	-1.6	7.6
2021	30.8	9.7	32.7	11.0	32.0	10.6
2022	-10.1	7.7	-6.9	9.2	-4.6	9.1
2023	6.0	7.1	7.9	8.6	9.1	8.7
2024	17.0	7.6	21.3	9.3	21.4	9.3
			Bond UCITS			
2021	4.8	3.3	2.3	4.1	2.3	3.5
2022	-7.5	1.6	-10.3	1.9	-5.3	2.1
2023	0.8	1.5	-0.7	1.6	-0.4	1.9
2024	7.2	1.7	6.3	1.5	5.7	1.8

Note: EU27 UCITS ongoing costs and annual performance net of ongoing costs, by management type, investment horizon and asset type, geometric mean aggregation, retail and institutional investors (%). Periods: 2024 covers the 2015–2024 reporting period, 2023 covers the 2014–2023 reporting period, 2022 covers the 2013–2022 reporting period, 2021 covers the 2012–2021 reporting period and 2020 covers the 2011–2020 reporting period. For passive bond UCITS, data were previously not available for longer horizons. The figures for the years 2020 to 2023 are different from the ones displayed in the previous editions of this report. For those years, the average net performances have been recalculated with 2024 characteristics applied retroactively. This allows for a better comparison across years. The investment horizon analysis is calculated as an average of annual performances at the end of all four quarters of the year.

Sources: Refinitiv Lipper, Morningstar Direct, ESMA.

[26] The sample includes both retail and institutional investors. We distinguish between UCITS ETFs and passive UCITS non-ETFs. Even if UCITS ETFs can primarily be considered passively managed funds, they differ from passive funds because ETF shares are listed on stock markets and can be traded more easily.

The analysis of ongoing costs[27] [28] by type of management shows a decline in costs for all types of management (MR-CP.14). From 2020 to 2024, ongoing costs for the one-year investment horizon declined by 7% for active equity UCITS, 12% for passive equity non-ETFs and 13% for equity ETFs. This decline in ongoing costs is also visible at the ten-year investment horizon.

For bond funds, the decline in costs between 2021 and 2024 reached 8% for active funds, 14% for passive non-ETF and 17% for ETFs.

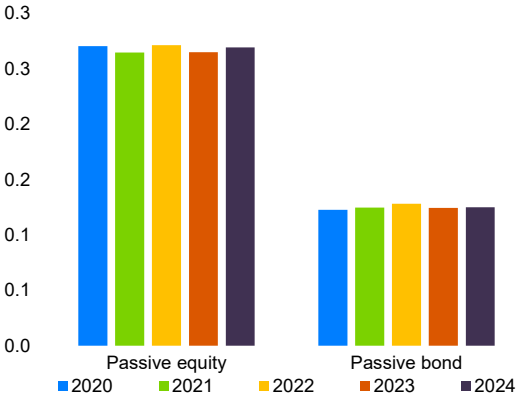
The decrease is, however, less pronounced from one year to another. Hence, in the equity UCITS segment, the difference of ongoing costs between 2024 and 2023 is only significant for ETFs (AMR-CP-S.10). In the case of bond funds, the regressions even show an increase of ongoing costs between 2023 and 2024 for active and passive non-ETF funds but a decrease for ETFs.

In addition, the passive non-ETF share classes present for the past 5 years or more didn't report, on average, any significant change in their ongoing costs year after year (MR-CP.15).

MR-CP.15

Passive ongoing costs by asset class for balanced sample

No significant reduction of costs



Note: EU27 UCITS ongoing costs, by asset type, geometric mean aggregation, passive non-ETFs, retail investors, %. Sample reduced to share classes continuously present in the sample since 2020.
Sources: Refinitiv Lipper, Mornigstar Direct, ESMA.

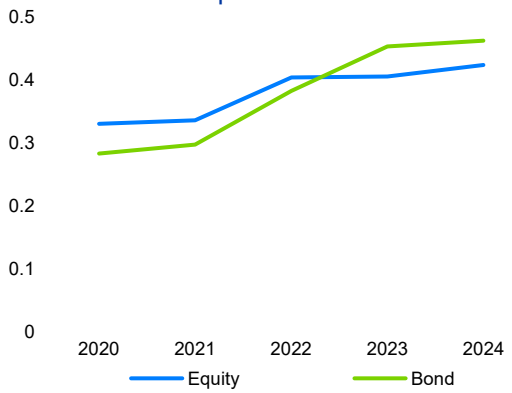
The difference of ongoing costs between 2020 and 2024 is not statistically significant for passive bond funds and only reached 1bp for equity passive funds.

Contrary to active funds, we observe an increase of the ongoing costs' dispersion across years (MR-CP.16).[29] This is visible for both equity and bond funds but more pronounced in the latter case.

MR-CP.16

Dispersion of passive ongoing costs by asset class

Increase in the dispersion



Note: Standard deviation of EU27 UCITS passive non-ETF retail ongoing costs, by asset type.
Sources: Refinitiv Lipper, Morningstar Direct, ESMA.

Similarly to last year, active equity funds (17.0%) significantly underperformed, in net terms, both passive funds (21.3%) and ETFs (21.4%) in 2024. This result holds even after controlling for the funds' strategy and characteristics. Conversely, active bond funds (7.2%) outperformed passive funds (6.3%) and ETFs (5.7%).[30]

Elsewhere, the ongoing costs of the top-25% (in terms of performance) of funds are overall similar to the ongoing costs of the rest of the sample (according to the regressions AMR-CP-S.15 and AMR-CP-S.16). The only exception is active bond funds for which the top 25% display, on average, higher ongoing costs than the overall sample (MR-CP.17).

27 The focus on ongoing costs is due to ETFs' subscription and redemption fees being borne mainly on the primary market. Retail investors are mostly concerned with the secondary market.

28 Trading in ETF also involves bid–ask spreads, a key component of the total costs paid by an investor to own an ETF. Bid-ask spreads can make the initial investment more expensive, especially considering that retail investment is carried out on the secondary market. Due to lack of data availability, this analysis does not include information on bid-ask spreads.

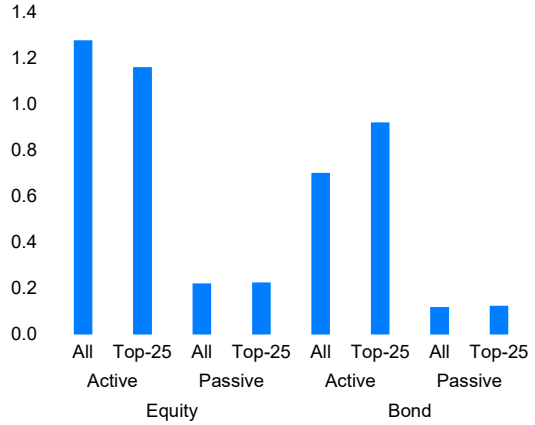
29 We measure the dispersion with the standard deviation. The standard deviation of quarterly ongoing costs is first calculated. Then the yearly figure is obtained through a simple mean.

30 In contrast to those in MR-CP.4, the figures provided in Table MR-CP.14 and charts MR-CP.17 and MR-CP.18 rely on a sample composed of both retail and institutional funds in order to ensure a large enough sample for each category.

MR-CP.17

UCITS costs of top-25% of funds

Higher costs for top-25% active bond



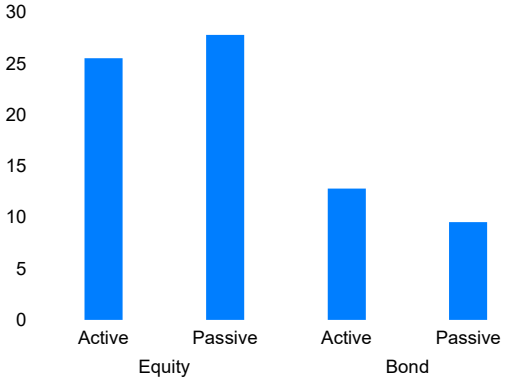
Note: EU UCITS ongoing costs for best performing funds ('Top-25') and all funds ('All'), by asset class and type of management, %.
Sources: Refinitiv Lipper, Morningstar Direct, ESMA.

In terms of net performance, the top 25% of active equity funds underperformed the top 25% of their passive peers at the one-year investment horizon (MR-CP.18). The regression controlling for the funds' strategy and characteristics confirms this underperformance (AMR-CP-S.17). For bond funds, the top 25% of active funds outperformed the top 25% of their passive peers at the one-year investment horizon.

MR-CP.18

UCITS net performance of top-25% of funds

Underperformance for top-25% active equity



Note: EU27 UCITS top-25% performing funds annual performance net of ongoing costs, by asset class and type of management, %.
Sources: Refinitiv Lipper, Morningstar Direct, ESMA.

Active ETFs

Market overview

Over the last years, the active UCITS ETF segment has seen a remarkable growth, fuelled by investors who seek higher returns by aiming to outperform market through active portfolio management within the (UCITS) ETF wrapper. This segment is comprised of 84 active UCITS ETFs out of which 34 fall under the active equity ETFs category and the remaining 50 fall under fixed income and other categories.

The size of active UCITS ETFs included in our sample was EUR 45.4bn at the end of 2024, a 59% increase compared to the end of last year. Despite this increase, active ETFs still remain a small fraction of the overall UCITS ETF market with their assets making up 2% of the EU UCITS ETF segment. Net annual inflows into active ETFs more than doubled, rising from EUR 6.1bn in 4Q23 to EUR 12.8bn by 4Q24. The investment focus of active equity ETFs is concentrated mostly around Global and US large cap companies, whilst exposure of active bond ETFs is towards ultra short-term bonds issued by European or US-based entities.

Performance and costs

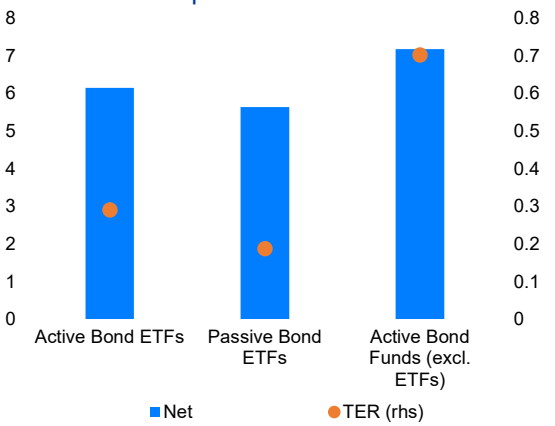
The analysis of ongoing costs by type of management for ETFs, reveals ongoing costs charged by active ETFs being 60% higher compared to the ones charged by passive ETFs for the one-year investment horizon. At the same time, gross and net returns for active ETFs appear to be lower by respectively 14% and 15% for the one-year investment horizon, with the difference being magnified as we move to longer investment horizons.

Breaking this down by asset class for the one-year investment horizon, we observe that active bond ETFs have higher ongoing costs (0.3%) compared to passive bond ETFs (0.2%), but both are much lower than active bond funds excluding ETFs (0.7%). This is visible from chart MR-CP.19 and confirmed by regressions (AMR-CP-S.19). Net performance in the bonds' segment indicates that active bond ETFs achieved a net performance of 6.3%, outperforming passive bond ETFs (5.7%) but trailing active bond funds excluding ETFs (7.1%). The underperformance of passive ETFs is confirmed by the regressions (AMR-CP-S.19).

MR-CP.19

Costs and Performance of bond funds at 1Y horizon

Active funds outperformed



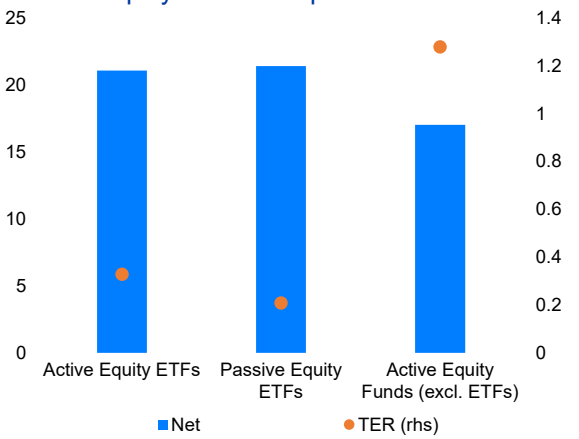
Note: Net annual performance and ongoing costs (TER), for active UCITS bond ETFs, passive UCITS bond ETFs and active UCITS bond funds (excluding ETFs).
Sources:Morningstar Direct, Refinitiv Lipper, ESMA.

In the sample of equity funds, active equity ETFs have higher ongoing costs (0.3%) than passive equity ETFs (0.2%) but remain far below active equity funds excluding ETFs (1.2%). In terms of net performance, regressions controlling for the funds' strategy show that passive ETFs outperformed active equity ETFs but the significance level is low (10%).

MR-CP.20

Costs and Performance of equity funds at 1Y horizon

Passive equity ETFs cheapest



Note: Net annual performance and ongoing costs (TER), for active UCTIS equity ETFs, passive UCITS equity ETFs and active UCITS equity funds (excluding ETFs).
Sources: Morningstar Direct, Refinitv Lipper, ESMA.

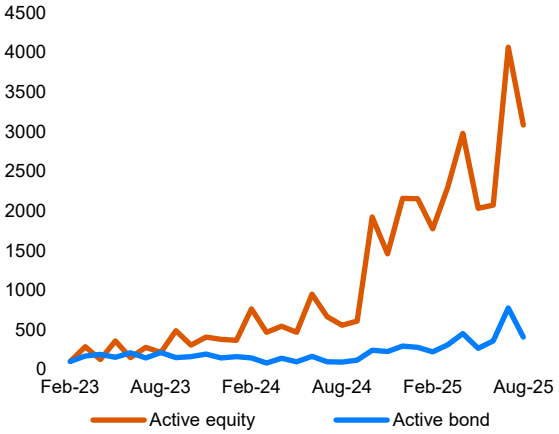
Retail investor activity

EU-level MiFIR transaction data enable the tracking of retail investor behaviour and trading patterns within the segment of active UCITS ETFs. In particular, for active equity ETFs, the data reveal an upward trend since the beginning of the time series, with a notable spike in activity around September 2024 and sustained elevated levels of retail participation thereafter.

MR-CP.21

Retail transactions in UCITS active equity ETFs

Steep increase in transactions since 4Q24



Note: Relative monthly number of transactions of EU27 UCITS active ETFs, by asset class, rebased to 100 at the start of the time series.
Sources: Refinitv Lipper, Morningstar, MiFIR transaction reporting, ESMA.

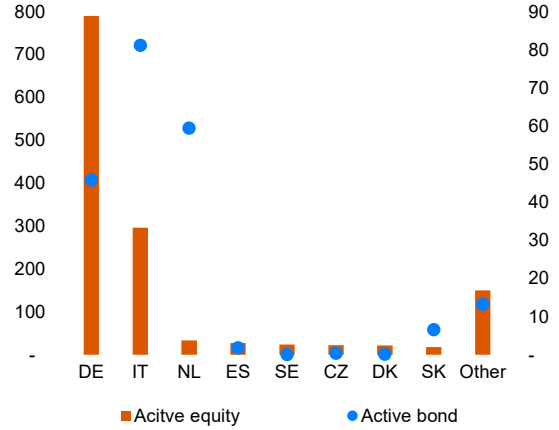
Similar but more subtle findings are observed for transactions into active bond ETFs, which by August 2025 accounted for around 12% of the overall transaction volumes of active ETFs.

Observing trading behaviour based on investor nationality by 2Q25, German and Italian investors dominate the active equity market making up for 57% and 21% of the total number of transactions of this segment respectively. In the active bond ETFs market, Italian and Dutch investors accounted for nearly 70% of the transactions.

MR-CP.22

Active ETF transactions by retail investor nationality

Many transactions by DE, IT investors



Note: Number of transactions (in thousands) in UCITS active equity ETFs and in UCITS active bond ETFs (rhs) by investor nationality, 2Q25.
Sources: Morningstar, Refinitv Lipper, MiFIR transaction reporting, ESMA

Fund and investor domiciles

Fund domicile analysis

Structural differences across markets linger, as do differences in investor preferences and marketing channels. The ESMA market report on total costs of investing in UCITS and AIFs show that UCITS are mainly indirectly distributed through a third-party entity. Credit institutions and investment firms play a central role in the distribution of UCITS in the EEA.[31] The report also highlights the substantial heterogeneity across Member States.

Another source of variability lies in the distribution costs and their regulatory treatment. Distributors of funds are compensated through commissions (i.e., inducements) paid by fund manufacturers, fees charged directly to the clients or both. In the first case, fund managers typically pay a share of their ongoing costs or one-off charges to distributors. Inducements can therefore be embedded in one-off charges or ongoing costs. The PRIIPs regulation foresees their reporting only as part of the aggregate cost figures without disclosing their exact level. This considerably bias the comparison between two funds domiciled in different jurisdictions, especially since inducements are usually not anecdotal. The ESMA Market Report on total costs of investing in UCITS and AIFs show that on average and across distributor channels, when manufacturers pay inducements, 45% of ongoing costs is paid as inducements to distributors.

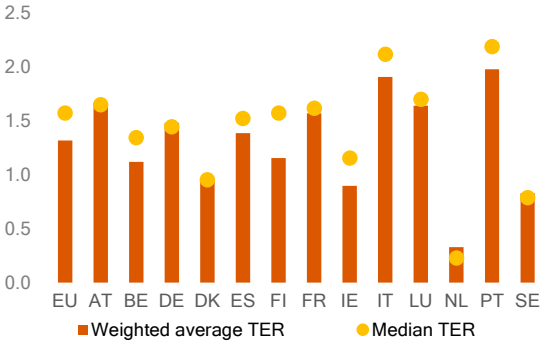
For all the reasons mentioned above, costs appear very heterogeneous among Member States. Funds domiciled in the Netherlands and Sweden exhibit the lowest ongoing costs in 2024 for equity funds, while the highest cost levels were observed in Italy and Portugal (MR-CP.23).

In addition to the structural differences mentioned previously, part of this heterogeneity is driven by sample composition effects. For instance, the share of passive funds, a significant driver of costs' heterogeneity, varies from 0% to 25% across jurisdictions. Similarly, the share of funds disclosing under Article 9 goes from 0% to 11%. Elsewhere, while the share of new funds is close to 0 in some countries, it reaches 11% in other jurisdictions.

MR-CP.23

Equity UCITS ongoing costs by domicile

High disparity of ongoing costs



Note: EU27 UCITS equity funds weighted average and median ongoing costs, retail investors, by domicile, 1Y horizon %. Averages weighted by the size of the share class. Other EU27 countries not reported.
Sources: Refinitiv Lipper, Morningstar Direct, ESMA.

Investor domicile analysis

When moving from the fund domicile analysis to the investor domicile analysis, the heterogeneity across Member States largely declines, with a clear decrease in national differences. For example, the ongoing costs for equity UCITS over the ten-year horizon were in the range of 1.7% in Belgium and 1.4% in Sweden (AMR-CP-S.126).

These results are primarily due to the composition of the sample. The information in terms of assets, flows and costs is only provided on an aggregated basis at the level of the fund's domicile. If a fund is distributed across several countries, no information is available regarding the assets under management (AuM) sold in each country, the net flows or the costs charged in the different countries. In addition, the information at our disposal indicates where the fund can be marketed but does not include information on whether the fund is actually sold in all the countries in which it can be distributed. Therefore, we apply the fund's domicile-based data to all the countries in which the fund can be marketed.[32] This analysis may involve some double counting of funds and related metrics.[33]

[31] ESMA Market Report on total costs of investing in UCITS and AIFs, November 2025.

[32] For instance, this applies if a fund can be marketed in two countries: country A and country B. To perform the calculations at the investor level (i.e., country A or country B), we use the information at the fund level (total AuM, total flows etc.).

[33] Very similar cost levels across countries in the analysis based on investor domicile are driven by the weighting used when aggregating funds, based on the net asset value (NAV) of the fund domicile and not that of the investor domicile. In the Netherlands, for example, the cost figure would have been lower if it had accounted for the country's inducement ban.

Impact of inflation

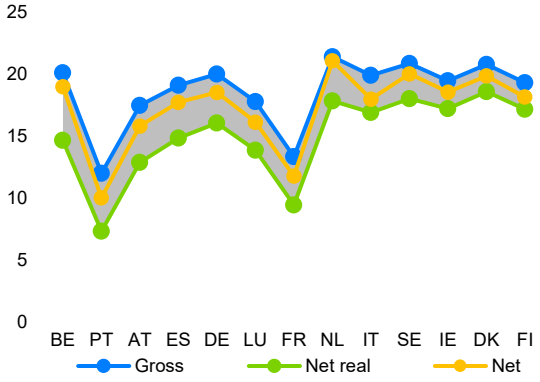
As highlighted in the market environment, while the disparity in inflation levels across EU Member States has reduced in 2024, it still adds to the cost heterogeneity described earlier. Given the lack of data regarding the actual marketing of funds outside their domicile, inflation is measured at the fund domicile level. This measure of inflation may diverge from that of inflation at the investor domicile level, given the cross-border nature of the UCITS market.

At the one-year horizon, the decrease in performance due to inflation was above 2pp at the EU level. This hides significant disparities across countries, with the annual inflation rate ranging from 1.0% in Finland to 4.3% in Belgium.

In countries with high inflation, such as Belgium, it creates a significant difference between gross performance and net real performance (MR-CP.24).

MR-CP.24

Equity UCITS gross, net and real net return at 1Y
Significant impact of inflation in some countries



Note: EU27 equity funds annual performance classified as gross performance, performance net of ongoing costs and net real performance, retail investors, by domicile, one-year horizon, %. Countries ranking based on the difference between gross and net real returns (from highest to lowest).
Sources: Refinitiv Lipper, Morningstar Direct, Eurostat, ESMA.

Environmental, social and governance (ESG) UCITS

In 2024, retail ESG funds (i.e., investment funds following ESG strategies according to Morningstar[34]) recorded limited inflows (EUR 7bn), with ESG bond funds attracting the highest net inflows in 2024 (EUR 25bn). Non-ESG funds attracted more inflows (EUR 231bn). Looking at the disclosure regime under the sustainable finance disclosure regulation (SFDR)[35] provides a coherent picture as funds disclosing under Article 6 recorded strong inflows (EUR 223bn) while funds disclosing under Article 8 or Article 9 recorded limited inflows in 2024 (EUR 15bn with respectively EUR 28bn for Article 8 and EUR -13bn for Article 9). ESG funds reported in 2024 positive returns, allowing a 17% growth of the retail ESG fund AuM in 2024, despite the limited inflows. It increased by EUR 221bn during 2024 to settle at EUR 1,499bn at the end of the year (AMR-CP-S.141). The share of ESG funds remained steady in 2024 at 21%. Equity funds still account for the largest share of ESG UCITS funds, with EUR 938bn in AuM (i.e., 63% of ESG fund assets in our sample).

Contrary to their non-ETF peers, ESG ETFs remains attractive for investors in 2024, with net inflows of EUR 29bn. The AuM of ESG ETFs increased in 2024, from EUR 286bn in the fourth quarter of 2023 to EUR 391bn at the end of 2024.

Similarly to last year, the ongoing costs of retail ESG UCITS (1.0%) were on aggregate similar to the ongoing costs of non-ESG funds (1.0%).

Looking at each individual asset class, the ongoing costs of equity ETFs were similar for ESG and non-ESG funds, while the ongoing costs of mixed funds were slightly higher for ESG funds. Elsewhere, the ongoing costs of ESG equity non-ETFs and bond funds were lower than those of their non-ESG peers.

The regressions presented in the annexes (AMR-CP-S.20) show that, when controlling for factors such as asset class or fund size / age[36], the TER

[34] For this year's report, we rely again on the Morningstar definition of sustainable investment fund. Morningstar classifies a product as a sustainable investment 'if the use of one or more approaches to sustainable investing is central to the investment products overall investment process based on its prospectus or other regulatory filings' (see Morningstar, Morningstar Sustainable Attributes – Framework and definitions for the 'sustainable investment' and 'employs exclusions' attributes, August 2022). We use the latest available information as of July 2025.

[35] Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector.

[36] For a detailed analysis of the factors potentially affecting the costs and performance of ESG funds, see ESMA, 'The drivers of the costs and performance of ESG funds',

of ESG funds was lower (with a difference of around 5bps on average across the four quarters) and statistically significant at the 1% confidence level. The results also hold for individual asset classes (AMR-CP-S.21 - AMR-CP-S.23).

MR-CP.25

UCITS gross performance and costs over one year

ESG funds underperformed in 2024

	ESG	Non-ESG
All funds (equity, bond and mixed UCITS)		
Net performance	13.6%	13.6%
Ongoing costs	1.0%	1.0%
One-off costs	2.2%	2.0%
Number of funds	3,663	13,917
Equity UCITS		
Non-ETFs		
Net performance	16.4%	17.7%
Ongoing costs	1.2%	1.4%
On-off costs	2.4%	2.5%
Number of funds	1,544	4,677
ETFs		
Net performance	19.6%	21.9%
Ongoing costs	0.2%	0.2%
One-off costs	1.7%	1.5%
Number of funds	389	724
Bond UCITS		
Net performance	6.1%	6.7%
Ongoing costs	0.5%	0.7%
One-off costs	2.0%	1.7%
Number of funds	884	3,759
Mixed UCITS		
Net performance	9.9%	11.2%
Ongoing costs	1.5%	1.4%
One-off costs	2.1%	2.1%
Number of funds	846	4,757

Note: EU27 ESG and non-ESG UCITS ongoing costs and annual performance net of ongoing costs in 2024 (one year investment horizon) and number of funds in 4Q2024, aggregated and by asset type, geometric mean aggregation (%). Retail funds only. ESG fund sample based on the Morningstar definition of sustainable investments (see footnote 34). Funds for which the sustainability information is not available are excluded from the sample (i.e., funds that are considered neither ESG nor non-ESG are excluded). ESG bond and mixed ETFs are included but not presented in a separate category given the low number of ESG ETFs in those asset classes (81 ESG bond ETFs and 3 ESG mixed ETFs).
Sources: Refinitiv Lipper, Morningstar Direct, ESMA.

One-off fees were, however, slightly higher for ESG funds (2.2% v 2.0%). This cost difference is driven by both the front charges and the back charges, which were slightly higher for ESG funds.

ESG funds underperformed their non-ESG peers in 2024. This year, the underperformance of ESG funds is visible for all the asset classes considered. This result is furthermore confirmed by the regressions. The underperformance of ESG funds in 2024 could be driven by their higher exposure to European or global markets, two regions that underperformed in the second half of 2024 America and Asia investment areas.[37]

MR-CP.26

UCITS gross performance and costs over 5 years

ESG funds still outperformed over 5 years

	ESG	Non-ESG
All funds (equity, bond and mixed UCITS)		
Net performance	5.5%	5.0%
Ongoing costs	1.1%	1.0%
One-off costs	0.5%	0.4%
Number of funds	3,663	13,917
Equity UCITS		
Non-ETFs		
Net performance	8.3%	8.0%
Ongoing costs	1.3%	1.4%
One-off costs	0.6%	0.6%
Number of funds	1,544	4,677
ETFs		
Net performance	9.5%	10.6%
Ongoing costs	0.3%	0.2%
One-off costs	0.4%	0.3%
Number of funds	389	724
Bond UCITS		
Net performance	0.1%	0.5%
Ongoing costs	0.6%	0.8%
One-off costs	0.5%	0.4%
Number of funds	884	3,759
Mixed UCITS		
Net performance	2.6%	3.4%
Ongoing costs	1.5%	1.4%
One-off costs	0.5%	0.5%
Number of funds	846	4,757

Note: EU27 ESG and non-ESG UCITS ongoing costs and annual performance net of ongoing costs (five-year investment horizon) and number of funds in 4Q24, aggregated and by asset type, geometric mean aggregation (%). Retail funds only. ESG fund sample based on the Morningstar definition of sustainable investments (see footnote 34). Funds for which the sustainability information is not available are excluded from the sample (i.e., funds that are considered neither ESG nor non-ESG are excluded). ESG bond and mixed ETFs are included but not presented in a separate category.
Sources: Refinitiv Lipper, Morningstar Direct, ESMA.

However, at the five-year investment horizon, ESG funds still outperformed non-ESG peers (MR-CP.26). This outperformance was mainly driven by the outperformance of ESG equity non-ETF and bond funds, as ESG equity ETFs and mixed funds underperformed their non-ESG equivalents.

ESMA Report on Trends, Risks and Vulnerabilities Risk analysis, May 2022.

[37] Morgan Stanley, Sustainable Fund Returns Lag Peers' in Second Half of 2024, March 2025.

Sustainable finance disclosure regulation disclosure regime

Additional sustainability-related information is now being provided by EU fund managers under the SFDR. Our sample includes 9,200 funds disclosing under Article 8 (almost half of them are equity funds) and around 720 disclosing under Article 9 (almost two thirds are equity funds).[38]

The regressions (AMR-CP-S.31 - AMR-CP-S.33) demonstrate an underperformance in gross terms of funds disclosing under Article 9 compared with funds disclosing under Article 6. This result holds for all asset classes considered and almost all quarters of 2024 and confirm the conclusions drawn from the comparison of ESG and non-ESG funds. The comparison with funds disclosing under Article 8 provides however mixed evidence. On aggregate, funds disclosing under Article 8 outperformed funds disclosing under Article 6 in the first and third quarter of 2024. This is mostly driven by bond funds since equity and mixed funds disclosing under Article 8 tend to underperform funds disclosing under Article 6.

In terms of costs, the regressions (AMR-CP-S.28 - AMR-CP-S.30) show that, among equity funds, funds disclosing under Article 6 reported the lowest ongoing costs.[39] The opposite result prevails for mixed funds with funds disclosing under Article 6 being the most expensive.[40] For bond funds, funds disclosing under Article 9 seem to be the cheapest, while the difference in TER between funds disclosing under Article 8 and funds disclosing under Article 6 is not statistically significant.[41]

ESG fund name

Another way for funds to signal their ESG orientation is through the name. Fund's name is one of the first information that investors see about a fund and it can give some indication about the fund' strategy. Previous studies have shown an increase in the use of ESG-related terms in funds name. The share of UCITS including ESG-related language in their names increased to around 15% mid-2024 from less than 3% before 2015.[42] The same study also demonstrated that adding an ESG word in a fund name is associated with significant inflows. It is therefore crucial to ensure that funds' names are not misleading and aligned with portfolio investments. To prevent misleading disclosures that could lead to greenwashing risk, ESMA published in May 2024 its final report on Guidelines on funds' names using ESG or sustainability-related terms.[43]

Given the attraction exerted by funds using ESG-related terms, it is relevant to assess their costs compared to funds that do not make any claim. Building on the work done by ESMA, we've identified UCITS with an ESG-related term in their name.[44] Equity and bond funds using an ESG-related term disclose, on average, lower ongoing costs. The result is also confirmed by the regressions. The regressions also demonstrate that mixed funds using an ESG-related term are associated with lower ongoing costs, even though the chart below show the opposite result.[45]

[38] Article 8 funds are investment products promoting sustainability characteristics. Article 9 funds are investment products with sustainable investment as their objective and Article 6 funds have neither sustainability characteristics nor a sustainable investment objective. Information on the SFDR disclosure regime was correct as of July 2025.

[39] This is different from the results obtained last year where the difference of TER between funds was in most cases not significant.

[40] A similar result was obtained last year. For further details, please see ESMA Market Report on costs and performance of EU retail investment products.

[41] A similar result was obtained last year. For further details, please see ESMA Market Report on costs and performance of EU retail investment products.

[42] ESMA, 'Fund names: ESG-related changes and their impact on investment flows', April 2025.

[43] ESMA, Final Report on Guidelines on funds' names using ESG or sustainability-related terms, May 2024.

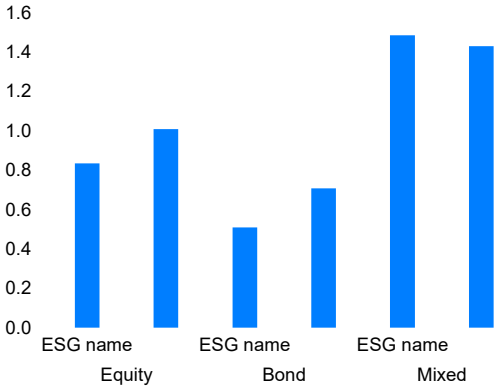
[44] Our sample includes around 2,500 UCITS using an ESG-related term (almost EUR 1tn of AuM at end 2024). The majority are equity funds (68% of AuM) followed by bond (20%).

[45] The discrepancy in the results may be due to sample composition effects. For instance, while marginal, the share of passive funds is slightly higher in the case of mixed funds with no ESG-related term (0.6%) than for mixed funds with an ESG-related term (0.3%). Elsewhere, while the main countries of domiciliation are the same across the two samples, their relative share diverge.

MR-CP.27

UCITS ongoing costs by name

Lower costs for funds using ESG-related terms



Note: EU27 UCITS ongoing costs, by asset class and fund's name, geometric mean aggregration, retail investors, %.
Sources: Refinitiv Lipper, Morningstar Direct, ESMA.

On aggregate, the ongoing costs of funds using an ESG-related term is around 6bps lower than the ongoing costs of funds that do not make any claim.

Summary findings

Costs and performance

— Costs: Ongoing costs in the EU continued to slightly decline in 2024. This is not necessarily visible from one year to the next, but it becomes more significant when looking at the long-term evolution. The reduction is driven, at least partially, by the new entrants that reported lower ongoing costs in 2024, whereas the share classes present for the past 5 years or more reported, on average, a more limited reduction of their ongoing costs year after year.

— Investment value: Investors paid around EUR 1,500 in ongoing costs for an investment of EUR 10,000, obtaining a net value of EUR 15,500 after ten years.

— Inflation: Inflation plays an exogenous but significant role on top of fund costs. For a ten-year EUR 10,000 investment, an investor loses more than EUR 3,600 due to inflation. For a ten-year EUR 10,000 investment, this leads to a net real value of around EUR 12,000.

— Time horizon: Investing long-term significantly reduces the risks related to swift and large changes in the valuation of financial products. It also reduces the impact of one-off costs.

— Investment strategy: costs (ongoing costs and transaction costs) and performance are significantly impacted by the investment strategy as well as the geographical region of the investment. For instance, funds focusing on large caps tend to have lower ongoing and transaction costs.

— Active ETFs: over the last years the active ETF segment has seen a remarkable growth. The size of active ETFs increased by almost 50% between the beginning of 2024 and the end of the year. The analysis shows that active ETFs report, on average, slightly higher costs than passive ETFs but lower costs than traditional active funds.

Structural market features

— Heterogeneity across Member States: The main drivers of heterogeneity were structural market differences and a lack of harmonisation in national regulations. The ESMA market report on total costs of investing in UCITS and AIFs show that UCITS are mainly indirectly distributed through a third-party entity (mainly credit institutions and investment firms) but with substantial heterogeneity across Member States. Another source of variability lies in the distribution costs and their regulatory treatment. Distributors of funds can be compensated through commissions (i.e., inducements) which are embedded in one-off charges or ongoing costs but not reported in the PRIIPs KIDs as a stand-alone category. The ESMA Market Report on total costs of investing in UCITS and AIFs shows that inducements are usually not anecdotal: on average and across distributor channels, 45% of ongoing costs is paid as inducements to distributors.

— Inflation by fund domicile: Inflation differences across Member States, measured at the level of the fund's domicile, adds to the cost heterogeneity.

ESG UCITS

— Costs: Ongoing costs of ESG funds are lower than the ongoing costs of non-ESG equivalents. The regression analyses confirm this result with a difference of around 5bps between the TER of ESG funds and the TER of non-ESG funds.

— Net performance: ESG funds underperformed their non-ESG equivalents in 2024. This is visible for all asset classes considered. Splitting the sample in line with the SFDR disclosure regime gives coherent results as funds disclosing under Article 6 of the SFDR outperformed funds disclosing under Article 9.

Investment funds – retail AIFs

Summary

Alternative Investment Funds reached almost EUR 8tn in assets in 2024, of which just above EUR 700bn was estimated to be held by retail investors (retail AIFs). The share of retail investors decreased for the second consecutive year to 9% in 2024 compared to almost 14% in 2022. Around a quarter of the total retail investment in AIFs is concentrated in funds primarily focusing on traditional asset classes, such as equities and bonds.

Annualised returns of AIFs offered to retail investors significantly improved from 2023 to 2024 for Funds-of-Funds, while other AIFs and the rest of the market reported similar returns for the two years. Real estate funds reported slightly declining gross and net performances. A hypothetical five-year investment of EUR 10,000 between 2020 and 2024, based on a stylised portfolio of AIFs, would yield around EUR 11,700, net of fees, or EUR 9,500 when considering the effect of inflation.

The creation of new European Long-Term Investment Funds (ELTIFs) surged recently, with 62% of them being launched in 2024 or 2025. ELTIFs classified as private equity reported the stronger returns in 2024 (10%).

The incentive to invest in AIFs is related to the potential for above-average returns and risks. However, AIFs are also related to lower market liquidity and lower market transparency and thus potentially a higher risk than more traditional types of investment.

The following analysis focuses on the abovementioned market segment and specifically on AIFs sold to retail investors (retail AIFs). It is based on data from the AIF managers directive, which regulates managers of AIFs in the EU[46] and excludes those authorised under the UCITS directive. The AIF types encompass not only hedge funds (HF), but also private equity (PE) funds, venture capital, real estate (RE) funds, funds of funds (FoFs), other AIFs ('Others')[47] and, as a residual category, 'None' (meaning none of the above)[48].

Market overview

The size of the EU AIF industry was almost EUR 8tn at the end of 2024, from EUR 7.7tn at end 2023. The market remained dominated by professional investors[49]. The share of retail investors underwent a decrease for the second consecutive year, reaching 8.9% by the end of 2024 (AMR-CP-S.164).[50] The total net asset value (NAV) of retail AIFs fell to around

[46] Directive 2011/61/EU of the European Parliament and of the Council of 8 June 2011 on alternative investment fund managers and amending Directives 2003/41/EC and 2009/65/EC and Regulations (EC) No 1060/2009 and (EU) No 1095/2010. For an overview of the EU AIF market, please see ESMA, EU Alternative Investment Funds 2023, ESMA market report, January 2024.

[47] Almost half of retail AIFs classified as other AIFs are either equity funds or bond funds (23% each). However, the strategy for 52% of other retail AIFs is unclear, as they are simply classified as 'other funds'. The remaining funds (2%) are commodity or infrastructure funds.

[48] Annex IV, Commission Delegated Regulation (EU) No 231/2013 of 19 December 2012 supplementing Directive 2011/16/EU of the European Parliament and of the Council with regard to exemptions, general operating conditions, depositaries, leverage, transparency and supervision. The residual category of 'other AIFs', labelled here as 'Others', includes the following investment strategies: commodity and infrastructure funds, and conventional non-UCITS investment funds pursuing more traditional strategies and targeting primarily traditional asset classes, such as equities and bonds. The 'other AIF' type includes a further residual category of other, unspecified strategies: 'other-other'. Often 'special funds' set up by single investors, such as insurance undertakings and pension funds, fall into this residual category. According to the ESMA guidelines, AIF managers should select 'None' as the predominant AIF type if the investment strategy of the AIF does not permit the identification of a predominant AIF type.

[49] Professional investors are identified using the criteria specified in Directive 2011/61/EU, Article 4 (1)(ag), and Annex II to Directive 2014/65/EC of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments and amending Directive 2002/92/EC and Directive 2011/61/EU.

[50] However, retail investment in AIFs is subject to underestimation, as retail investors may buy products invested in AIFs through banks or insurance firms, which fall into the category of professional investors.

EUR 709bn at the end of 2024 from almost EUR 870bn in 2023. Thus, AIFs sold to institutional investors are the main driver of the overall increase in the value of EU AIFs.

In 2024, retail clients were primarily invested in AIFs classified as 'Others' (50%; AMR-CP-S.165), RE funds (28%) and FoFs (14%)[51].

AIFs can invest in a variety of assets, including property and commodities, and rely on a high degree of flexibility around the strategy followed when they invest[52]. Focusing on retail clients, most of the NAV was concentrated in the strategy 'Other' (41%), a decrease of 9pp compared to last year. This 'Other' category can be further divided into other funds (26%), other FoFs (11%) and other HFs, PE funds and RE funds (4%). Investment in the commercial RE strategy increased to 23% from 17%. The share of funds focusing on equity and fixed income strategies was similar in 2024, at respectively 12% and 11% (AMR-CP-S.166).

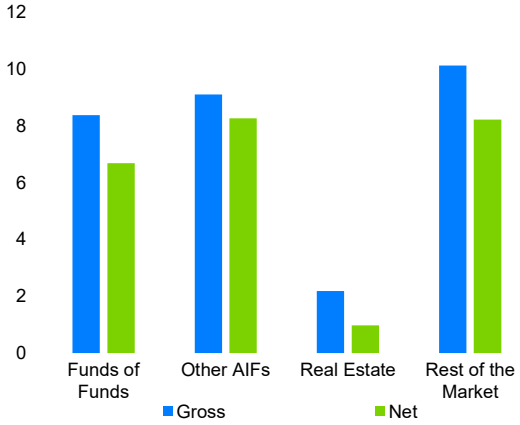
Retail AIF performance

MR-CP.28 shows the annualised monthly performance in 2024 by fund type. The performance of FoFs significantly improved between 2023 and 2024 (+3pp in gross terms) while the gross performance of other AIFs and the rest of the market remain broadly stable.

MR-CP.28

Retail AIFs gross and net performance at 1Y horizon

Positive returns in 2024 for all AIF types



Note: EEA30 AIFs annualised monthly gross and net performance by fund type, %, 2024. Reported according to AIFMD. Rest of the market includes Hedge Funds, Private Equity and None.
Sources: National competent authorities, ESMA.

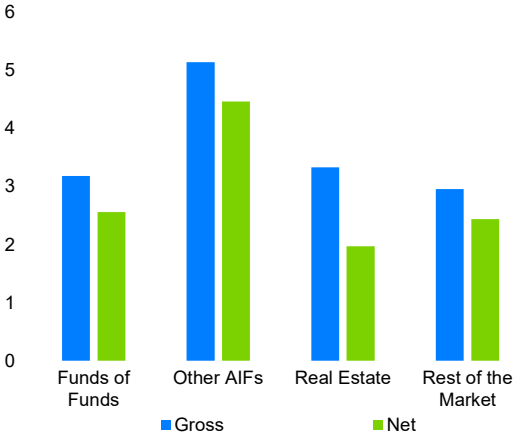
However, the performance of FoFs remains lower than the performance of Other AIFs and the rest of the Market. Only real estate funds experienced an aggregated decline of their gross performance between 2023 and 2024 (-0.8pp).

The performance over 5 years appears positive for all retail AIF segments (MR-CP.29) even if the returns at five years slightly diminished compared to the previous edition. This is related to the change of period considered as strong returns were reported in 2019.[53]

MR-CP.29

Retail AIFs gross and net performance between 2020 and 2024

Positive returns for all AIF types



Note: EEA30 AIFs annualised monthly gross and net performance by fund type, five-year horizon, %. Reported according to AIFMD. Rest of the market includes Hedge Funds, Private Equity and None.
Sources: National competent authorities, ESMA.

A hypothetical five-year investment of EUR 10,000 between 2020 and 2024, based on a stylised portfolio composed of other AIFs (40%), FoFs and RE funds (30% each), would yield around EUR 11,700 in net terms[54]. Taking the effect of inflation into account, the same investment would yield in real terms approximately EUR 9,500, an amount just below the initial investment.

Retail AIF costs

Some information on costs (i.e., costs extracted from PRIIPs KIDs) is reported by commercial data providers. While the coverage is not exhaustive, it improved substantially this year with 30% of the retail AIF sample retained for the

[51] ESMA, 'EU Alternative Investment Funds - 2020', ESMA annual statistical report, 10 January 2020. In Commission Delegated Regulation (EU) No 231/2013, AIFs are classified into five main types: HFs, RE funds, FoFs, PE funds, and other AIFs (Others). See footnote 47 for details of this last category.

[52] ESMA, 'AIFMD – A framework for risk monitoring', in: ESMA Report on Trends, Risks and Vulnerabilities, No 1, 2018, p. 40.

[53] ESMA Annual Statistical Report, Performance and costs of EU Retail Investment Products, April 2021.

[54] The calculation is based on the net performance reported by AIF managers through the AIFM reporting.

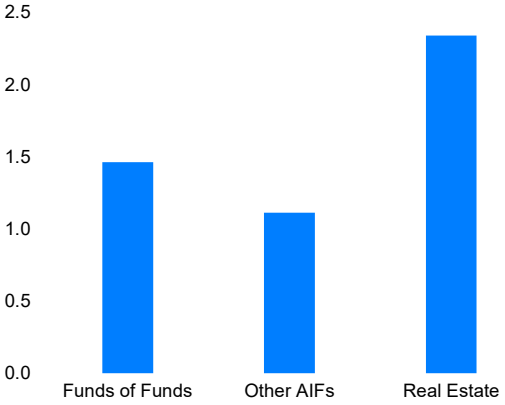
analysis of costs (compared to 9% in the previous edition).[55]

AIFs in the category 'Other' have the lowest costs with ongoing costs at 1.1% (MR-CP.30), a level comparable to the one reported last year. FoFs have an intermediate position with ongoing costs of 1.5%, while RE funds display the highest ongoing costs (2.3%).

MR-CP.30

Retail AIFs ongoing costs

Lowest ongoing costs for other AIFs



Note: EEA30 AIFs ongoing costs, by fund type, 2024, %.
Sources: National competent authorities, Refinitiv Lipper, Morningstar Direct, ESMA.

European Long-Term Investment Fund

A specific category of AIFs has seen its rules revised in 2024. The revised European Long Term Investment Fund (ELTIF) regulation is applicable since January 2024. The updated rules bring more flexibility with the aim to boost the attractiveness of these products.

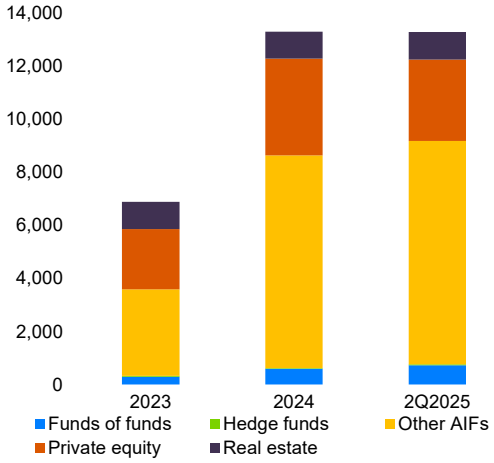
The ESMA register includes 246 ELTIFs. Luxembourg is the main country of domiciliation with 60% of ELTIFs, followed by France (22%). The majority of these funds are recent with around 62% of them launched in 2024 (28%) or 2025 (35%). Around one quarter of ELTIFs are dedicated to professional investors only, while 60% are either dedicated to retail investors or to both retail and professional investors.

134 of these ELTIFs were reported in the AIFMD databases, for a cumulated net asset value (NAV) of EUR 13bn at mid-2025 (MR-CP.31).[56] Half of ELTIFs are classified as other AIFs (63% in terms of NAV at mid-2025). Private equity is the second type of ELTIFs, whose share however declined between 2023 and mid-2025 (23% mid-2025 vs 33% in 2023).

MR-CP.31

Evolution of ELTIFs NAV

Total NAV increased since 2023



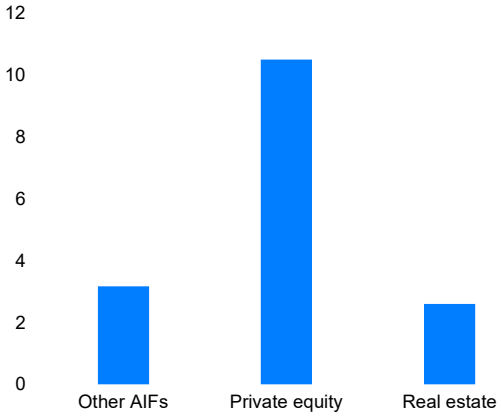
Note: NAV of ELTIFs, by fund type, EUR mln.
Sources: National competent authorities, ESMA.

ELTIFs classified as private equity reported the stronger returns in 2024 (10%) while ELTIFs classified as other AIFs and real estate reported gross returns around 3% (MR-CP.32).[57]

MR-CP.32

ELTIFs gross performance at 1Y horizon

Strong returns for ELTIFs classified as PE



Note: ELTIFs annualised monthly gross performance by fund type, 2024, %. Reprted according to AIFMD.
Sources: National competent authorities, ESMA.

[55] This was made possible by relying on a second data providers and doing some manual matching on AIFs' name when no other common identifier was available.

[56] It should be noted that among the ELTIFs that couldn't be found, more than 60% were authorised in 2025 and around 10% were indicated as no more marketed or not marketed yet.

[57] An analysis of costs was not possible due to the very limited coverage as only 16 ELTIFs can be retained for the costs analysis.

Summary findings

— Retail investment: In 2024, retail investors accounted for less than 9% of the total NAV for the AIF market. This represents a 2pp reduction compared with 2023.

— Fund type: Assets invested in retail AIFs were concentrated in the type of AIFs classified as 'Others' (50%), RE funds (28%) and FoFs (14%). Compared with the previous edition, the share of the 'None' category decreased significantly (from 10% to 1%).

— Strategy: Most of the NAV was concentrated in the strategy 'Other' (41%), followed by commercial RE (23%) and equity strategies (12%).

— Investment value: A hypothetical five-year investment of EUR 10,000 between 2020 and 2024, based on a stylised portfolio composed of other AIFs (40%), FoFs and RE funds (30% each), would yield around EUR 11,700 in net terms. Taking the effect of inflation into account, the same investment would yield in real terms approximately EUR 9,500.

— Performance: In 2024, annualised monthly gross and net performance improved significantly for FoFs compared with performance in 2023, while other AIFs and the category rest of the market reported similar returns compared with 2023. RE funds reported slightly declining gross and net performance.

— Costs: A full analysis of AIF costs is still impaired by the lack of data. Nevertheless, the share of retail AIFs retained this year for the costs analysis significantly improved and reached around 30% (compared to 9% in the previous edition). On average, RE funds are the most expensive category of retail AIFs, while other AIFs reported the lowest ongoing costs.

— ELTIFs: The AuM of ELTIFs increased since 2023, a potential consequence of their revised regulation, applicable since January 2024. Most of the ELTIFs are classified as other AIFs (66% when considering the NAV) followed by private equity (23%). The latter category reported the highest gross performance for 2024.

Structured retail products

Summary

Structured retail products (SRPs), with an outstanding value of EUR 392bn in 2024 (+8% from 2023) remain a much smaller market than UCITS and AIFs sold to retail investors. Products referencing interest rates continued to grow. Their market share reached 27%, up from just 1% in 2021.

We provide an EU-wide analysis of performance scenarios and costs, drawing on commercial data. Costs – largely charged in the form of subscription fees – remained broadly stable in 2024 for most larger issuers, although they varied substantially by payoff type and country.

The analysis of performance scenarios shows limited differentiation between the moderate scenario and the favourable scenario as presented to retail investors in the key information document.

Overall, taking as a reference the return of the median SRP in the moderate scenario, a hypothetical five-year investment of EUR 10,000 undertaken in 2024 would yield around EUR 13,194, in net terms, at maturity. This figure increases to EUR 13,765 in a favourable scenario, but it drops to EUR 10,000 in an unfavourable scenario and EUR 1,519 in a stress scenario. SRPs that matured in 2024 consistently delivered positive returns in gross terms, but these figures do not consider the incidence of costs paid by investors.

Structured products are investments for which the return is linked to the performance of one or more reference indices, prices or rates (reference values). Several types of structured products are offered to retail investors in the EU, many with complex pay-off structures and with different risk levels. This, together with the existence of significant costs and charges for retail investors, prompts continued market surveillance. Moreover, unlike long-term investment products such as funds, many structured products may be designed for hedging purposes or to speculate on price movements over a period of months or years[58].

Product distribution is another source of heterogeneity in the market for structured products. First, some standardised products are issued on a recurring basis, while others are issued as part of a specific offer with a pre-determined subscription period[59]. Second, the EU market involves both bank-issued and exchange-issued products. There is geographical variation in this respect – for example, exchange-based issuance tends to be more common in Germany, while bank-based issuance tends to be more common in Italy.

Market overview

SRPs had an outstanding value of around EUR 392bn in 2024, up 8% on the previous year[60]. The market for SRPs remains a much smaller market than that for UCITS and AIFs sold to retail investors.

Over half (54%) of SRP sales volumes were capital-protected products in 2024. This share was similar to the previous year, but up from 21% in 2022 and only 5% in 2021. The large increase is likely to be related to the increase in interest rates over this period, making fixed-income

[58] Reference values may include stock indices, the prices of individual equities or other assets, and interest rates. For more details on SRPs, please see the 2022 edition of this report.

[59] According to the commercial data used in this section, approximately 73% of outstanding product volumes at the end of 2021 in the EU were tranche products.

[60] Of this total, around EUR 270bn was in tranche products (i.e. available for a limited time only) and around EUR 90bn in continuous products (i.e. with no fixed subscription period, and no maturity date).

products more attractive to investors. The term profile of SRP sales shifted to longer-term products, with the share of short-term products (less than 1 year maturity) falling to 7% (-4pp from 2023) and those with 1-3 years maturity falling sharply to 16% (-15pp).

In terms of the asset classes referenced by SRPs, products referencing interest rates saw a large increase in their share of sales volumes to 28% (+9pp from 2023). The largest asset class by issuance volume remained products with equities or equity indices as underlying (65%).

Costs and performance

Our calculations are based on a data sample of SRP KIDs (issued since 2018 under the PRIIPs KIDs delegated regulation[61]), including information on various cost figures, absolute and percentage product returns under different performance scenarios, and the SRI. The following analysis mainly focuses on 13,891 SRPs issued in 2024[62]. Sales of products in this sample amount to EUR 59bn, which accounts for 56% of the total sales of SRPs to retail investors in 2024 in the EU.

Costs

The two key types of costs are those embedded in the product when it is issued and presented in the KID[63] and costs involved in distributing the product, such as sales commissions. The analysis in this report focuses on the former.

Although the cost ranges of SRPs available for sale in various Member States can be very different, the median product costs in the three largest markets (Italy, France and Germany) were tightly clustered between 0.6% and 0.7% (MR-CP.33). Product costs often also varied widely within the same country. This variation is not entirely explained by classifying the products according to the different payoff structures (MR-CP.34) and the underlying asset class (MR-CP.35), as broad ranges can typically be observed within each of these categories. This demonstrates the importance of prospective investors comparing alternative SRP manufacturers and offers even within the same market and for the same type of product.

In terms of underlying asset type, the SRPs with the highest costs tended to be those based on a basket of shares and those based on multiple underlying asset classes ('hybrid'), although a handful of products based on funds displayed particularly high costs. At the other end of the spectrum, products based on foreign exchange and interest rates tended to offer cheaper options. Products backed by equity indices and those backed by single shares display large cost ranges (MR-CP.35).

MR-CP.36 examines how the costs of SRPs offered in 2024 changed compared with similar products in our dataset issued in 2023, using the annual cost impact over a product's recommended holding period (RHP). To allow for some comparability between products offered at different times, SRPs are grouped based on their payoff type and manufacturer. For each of these groups of products, the median cost of products offered in 2024 is compared with the median cost of products issued in 2023. The chart shows the difference between these two measures. After a reduction in costs was reported in the last edition of this report for some popular payoff types (autocall, reverse convertible and barrier reverse convertible), reversing an upward trend observed in the previous two years, costs remained broadly stable in 2024, especially for larger issuers. Some more variation is observed across smaller issuers, with a slight tendency towards cheaper products. This contributed to a decrease in the median product cost in the overall sample from 0.9% in 2023 to 0.8% in 2024. However, sample composition effects – such as the growing number of cheaper products referencing interest rates – might also explain this apparent cost reduction.

In terms of the composition of the total costs of SRPs, previous editions of this report showed that expenses are typically front-loaded in the form of entry costs[64]. Only few products (less than 3%) incur recurring costs over their lifetime. This feature is typically reflected in a far higher incidence of costs if the investment is withdrawn after one year than when calculated over a product's lifespan, as presented in the KID.

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61 Commission Delegated Regulation (EU) 2017/653.

62 Unless otherwise indicated. Sample sizes in the following charts may vary due to missing information for certain variables.

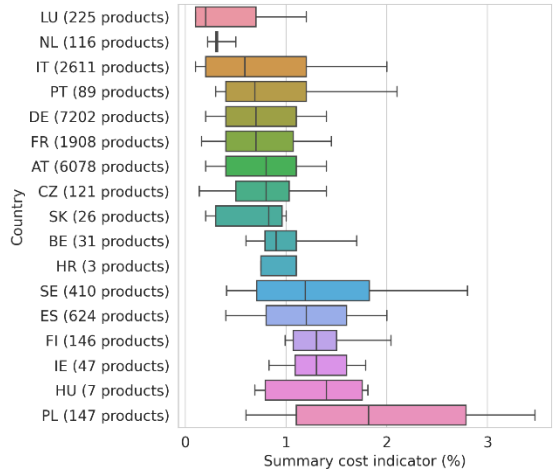
63 These are expressed using summary cost indicators and represent the costs known by the PRIIP manufacturer, as specified in Annex VI to Commission Delegated Regulation (EU) 2017/653.

64 The 2023 edition of this report, for data on SRPs issued in 2022, showed that entry costs were the only costs in almost 97% of the KIDs, up from 92% in the previous year.

MR-CP.33

Total costs for SRPs by country

Substantial variation in product cost by country

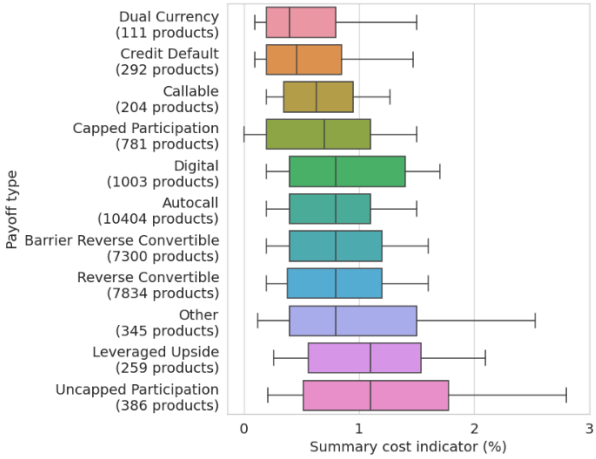


Note: Each bar displays the range in the annual impact of costs on the return over the RHP for products sold in a country. The same product can be sold in multiple countries. The vertical line in each box shows the median percent cost. Box edges are the 25th and 75th percentiles, and additional lines ('whiskers') represent the 10th and 90th percentiles for the respective country.
Sources: ESMA, structuredretailproducts.com, financial entities' websites.

MR-CP.34

Total costs for SRPs by payoff type

Most payoff types present wide cost ranges

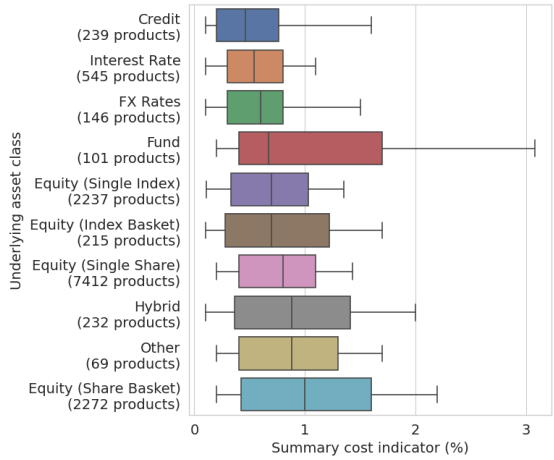


Note: Each bar displays the range in the annual impact of costs on the return over the RHP for products with that payoff type. The same product can appear under multiple payoff types. The vertical line in each box shows the median percent cost. Box edges are the 25th and 75th percentiles, and additional lines ('whiskers') represent the 10th and 90th percentiles for the respective payoff type. 'Other' comprises payoff types that have 100 or fewer observations in the data sample.
Sources: ESMA, Structuredretailproducts.com, financial entities' websites.

MR-CP.35

Total costs for SRPs by underlying asset

Cheapest products based on rates and credit

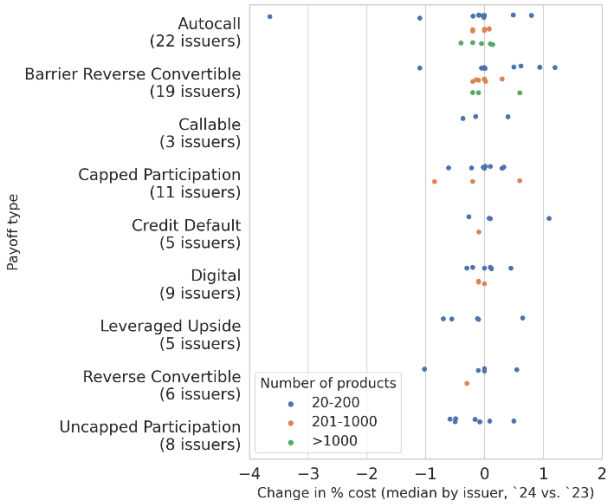


Note: Each bar displays the range in the annual impact of costs on the return over the RHP for products with that underlying asset class. Box edges are the 25th and 75th percentiles, and additional lines ('whiskers') represent the 10th and 90th percentiles for that underlying asset type. 'Other' comprises underlying asset classes that have 20 or fewer observations in the data sample, such as funds, commodities and real estate.
Sources: ESMA, Structuredretailproducts.com, financial entities' websites.

MR-CP.36

Change in total costs in 2024 from 2023

Costs broadly stable for most large issuers



Note: Each dot in the chart represents the difference between the median annual costs over the RHP for SRPs issued in 2024 and the same figure for SRPs issued in 2023, for products of that payoff type and by a specific issuer. Only issuers (dots) with at least ten products for that payoff type both in 2023 and in 2024 are shown. Payoff types with fewer than three issuers are not shown. One product can appear under multiple payoff types.
Sources: ESMA, Structuredretailproducts.com, financial entities' websites.

Performance

MR-CP.37 displays the range of investment returns across the four performance scenarios laid out in the KID, at two investment horizons: one year and the product's RHP[65]. The simulated product returns under the stress and unfavourable scenarios are well below the moderate scenario returns, with shorter-term returns significantly more adverse than those seen if the product is assumed to be held until maturity. On the other hand, the ranges of simulated returns at the RHP display little distinction between the favourable and the moderate scenarios. This apparent drawback is due in part to the scenarios being based on different horizons when using different simulated termination dates for the product, as is the case, for instance, for many autocall products[66]. Another reason might be payoff structures that often 'cap' outperformance[67].

The moderate scenario can be considerably adverse, especially after one year, despite it being the second-best scenario out of the four (20% of the SRPs offer negative returns at this horizon, compared with 6% at the RHP or another early termination date), which illustrates the unfavourable implications for retail investors of not holding on to their investment for the entire duration of the RHP[68]. Most of the products that are expected to deliver negative returns in the moderate scenario fall under one of several payoff type categories, such as 'leveraged upside', 'capped participation' and 'uncapped participation' (MR-CP.38). These products are often characterised by a 'worst of' optionality, whereby the product's performance depends on the worst performing asset from a predetermined reference basket.

Overall, taking as a reference the return of the median SRP in the moderate scenario over the RHP, a hypothetical five-year investment of EUR 10,000 undertaken in 2024 would yield around EUR 13,194, in net terms, at maturity. This figure increases to EUR 13,765 in a favourable scenario but drops to EUR 10,000 in the unfavourable scenario and EUR 1,519 in the stress scenario [69].

Looking at how simulated returns vary depending on a product's SRI, within the favourable scenario high-SRI products are associated with higher returns (MR-CP.39). This appears sensible as the favourable scenario represents 'upside risk' for an investor. Conversely, the higher the SRI for an SRP, the lower the simulated returns in both the unfavourable and stress scenarios. Within the moderate scenario, there is little variation in simulated returns across SRI categories. This pattern (the riskier the product, the higher the variability of returns across scenarios) confirms that the SRI calculation methodology is functioning as intended (i.e., as a proxy for the volatility of the product's return).

Separately, we looked at the actual performance of the SRPs – issued from late 2017 onwards – that matured in 2024 (MR-CP.40). Against the backdrop of favourable market conditions, returns were largely positive, with a small sample of capped and uncapped participation products faring worse in relative terms (more than 10% delivered negative returns). Overall, only 3% of the products in the sample yielded negative returns – 1% when weighted by sales volume. However, these figures are not yet adjusted for the costs paid by investors, for whom the final outcome might be markedly different. In particular, products such as autocalls might deliver elevated returns when they terminate early in favourable market conditions, but these may be offset by the costs – relatively high due to the short duration of the product – paid by the investor up-front when subscribing.

[65] The scenarios are favourable (90th percentile of simulated returns), moderate (50th percentile of returns, i.e. the median), unfavourable (10th percentile), and stress (1st or 5th percentile, depending on the type of product). Depending on the product and scenario, the shorter horizon may be missing, and the longer horizon may be shorter than the RHP (e.g. if the product is called before the RHP in that scenario).

[66] These circumstances can even result in higher returns for the moderate scenario than the favourable scenario over their horizons: this happens for 35% of the products, with 99.5% of those products being autocall.

[67] For 16% of the products, the favourable and moderate scenario returns at the RHP are equal.

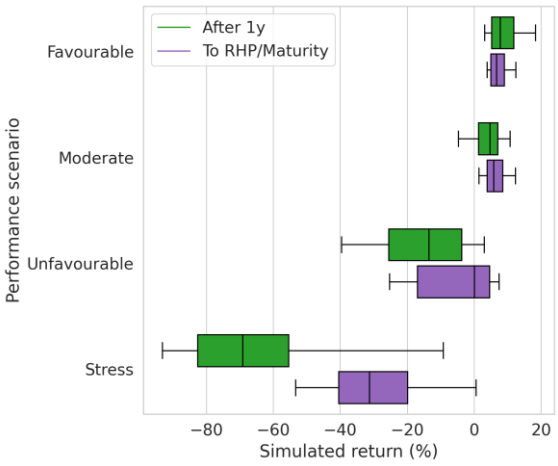
[68] In fact, many of these products are intended to be held to maturity: they are structurally illiquid as they do not have a secondary market and they must be redeemed with the issuer.

[69] The return of the median product in the unfavourable scenario is 0%. These projections represent nominal outcomes, as the inflation rate over the holding period is unknown.

MR-CP.37

Simulated returns across scenarios

Similar favourable and moderate scenarios

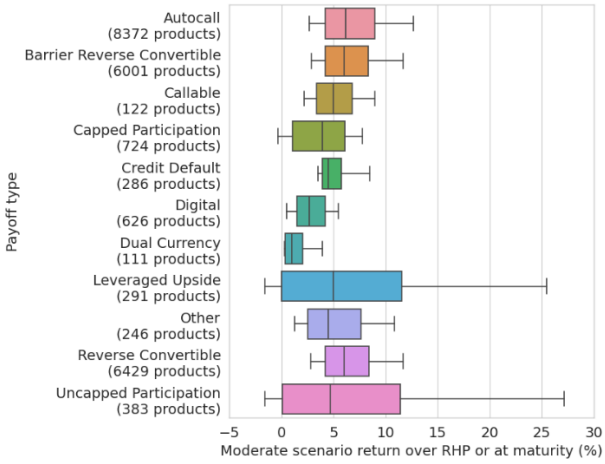


Note: The chart shows the range in annual returns for SRPs in each performance scenario, over two horizons. The longer horizon corresponds to the RHP or the early termination date in that scenario. The one-year horizon might not be present in a specific product or in a specific scenario. The sample for the longer horizon comprises 10,914 products; for the one-year horizon it comprises between 6,276 (moderate scenario) and 10,403 (stress scenario) products. The vertical line in each box shows the median simulated return in that performance scenario category. Box edges are the 25th and 75th percentiles, and additional lines ('whiskers') represent the 10th and 90th percentiles for that category.
Sources: ESMA, Structuredretailproducts.com, financial entities' websites.

MR-CP.38

Moderate scenario returns across payoff types

Few products foresee negative returns

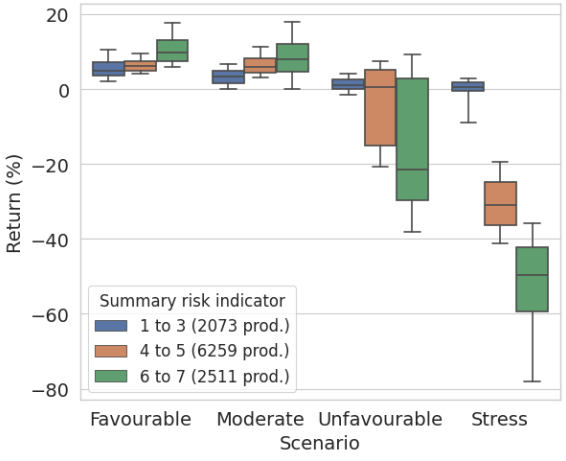


Note: Each bar displays the range in annual returns under the moderate scenario over the RHP or at product maturity, for products with that payoff type. The same product can appear under multiple payoff types. The vertical line in each box shows, within each payoff type, the median moderate scenario returns (after costs) at the RHP. Box edges are the 25th and 75th percentiles, and additional lines ('whiskers') represent the 10th and 90th percentiles for that payoff type. 'Other' comprises payoff types that have 100 or fewer observations in the data sample.
Sources: ESMA, Structuredretailproducts.com, financial entities' websites.

MR-CP.39

SRI and simulated returns

SRI consistent with volatility of performance

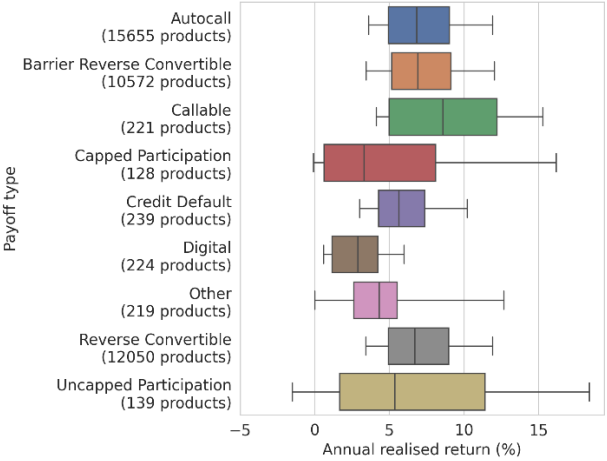


Note: The chart shows the range of returns (over the RHP or at product termination) in each scenario for 10,843 SRPs grouped by the SRI. The horizontal line in each box shows the median simulated return for a specific performance scenario and SRI. Box edges are the 25th and 75th percentile simulated returns across the group, and additional lines ('whiskers') represent the 10th and 90th percentiles.
Sources: ESMA, Structuredretailproducts.com, financial entities' websites.

MR-CP.40

Actual returns for SRPs that matured in 2024

Largely favourable returns gross of costs



Note: The chart presents the range of annual returns for 18,406 SRPs that matured or expired in 2024, grouped by payoff type. The returns reflect both the coupons paid over an SRP's life and the capital return but are not adjusted for the costs paid by investors. The vertical line in each box shows the median return for SRPs of that payoff type. Box edges are the 25th and 75th percentiles, and additional lines ('whiskers') represent the 10th and 90th percentiles for that payoff type. One product can be assigned to multiple payoff types. 'Other' comprises payoff types that have 50 or fewer observations in the data sample.
Sources: ESMA, Structuredretailproducts.com, financial entities' websites.

Summary findings

The key findings are as follows:

— SRP market: The total value of SRPs held by EU retail investors increased slightly in 2024 to approximately EUR 392bn, but remained a relatively small market compared with other financial instruments such as UCITS. Volumes and types of SRPs sold in national markets within the EU showed high heterogeneity. Products referencing interest rates continued to grow market share, reaching 27%, up from just 1% in 2021.

— Underlying assets: The share of products referencing interest rates continued to grow, their market share reaching 27%, up from just 1% in 2021. This trend followed higher interest rates.

— Costs: Total costs for SRPs are usually paid at subscription. These costs appear to vary substantially depending on the country in which they are marketed and the payoff type, but also depending on the issuer and other characteristics of the products.

— Costs of products issued in 2024 remained broadly stable for most large manufacturers. While the median product cost in the overall sample decreased from 0.9% in 2023 to 0.8% in 2024, sample composition effects – such as the growing number of cheaper products referencing interest rates – might contribute to explaining this apparent cost reduction. Continued monitoring of the SRP market is warranted to assess the significance of this trend.

— Performance: Once costs were taken into account, the simulated returns for one out of five SRPs were below zero if the investor were to exit after one year, even in a moderate performance scenario. This highlights that prospective SRP investors should carefully consider their investment horizon and make appropriate comparisons between investment products.

— Risk: There is a significant negative correlation between a product's SRI and the simulated returns in negative performance scenarios: the higher the SRI, the lower the simulated returns in both the unfavourable and stress scenarios. This provides evidence that the SRI calculation methodology used in the KID is functioning as intended from an investor protection perspective.

Annexes

In the annexes to the report, we provide details on the data and data limitations, the statistical methods that are the basis of the analysis report, and statistics reporting extensive and up-to-date charts and tables with key data on UCITS, retail AIFs and SRPs. These annexes can be accessed on ESMA's website.

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List of abbreviations

AIF	Alternative Investment Fund
AIFM	Alternative Investment Fund Manager
AIFMD	Alternative Investment Fund Managers Directive
AMF	Autorité des marches financiers
AuM	Assets under Management
BaFin	Bundesanstalt für Finanzdienstleistungsaufsicht
BIS	The Bank of International Settlements
BL	Redemption fees (back loads)
BPS	Basis points
CESR	Committee of European Securities Regulators
CMU	Capital Market Union
CONSOB	Commissione Nazionale per le Società e la Borsa
CSSF	Commission de Surveillance du Secteur Financier
EA	Euro Area
EBA	European Banking Authority
ECB	European Central Bank
EEA	European Economic Area
EFAMA	European Fund and Asset Management Association
EIOPA	European Insurance and Occupational Pensions Authority
ESA	European Supervisory Authorities
ESG	Environmental, Social and Governance
ESMA	European Securities and Markets Authority
ESRB	European Systemic Risk Board
ETF	Exchange Traded Fund
EU	European Union
FCA	Financial Conduct Authority
FL	Subscription fees (front loads)
FMA	Financial Market Authority
FoF	Fund of funds
FSMA	Financial Services and Markets Authority
HCMC	Hellenic Capital Market Commission
HICP	Harmonised Index of Consumer Prices
HF	Hedge Funds
IBIP	Insurance-based investment products
IDD	Insurance Distribution Directive
IORP	Directive on the activities and supervision of institutions for occupational retirement provision
KID	Key Information Document
KIID	Key Investor Information Document
MiFID	Markets in Financial Instruments Directive
MiFIR	Markets in Financial Instruments Regulation
MMF	Money Market Fund
NAV	Net Asset Value
NCA	National Competent Authority
PE	Private Equity
PRIIP	Packaged retail investment and insurance products
PPP	Personal pension products
pp	Percentage points
RE	Real Estate
RTS	Regulatory Technical Standards
SFDR	Sustainable Finance Disclosure Regulation
SMSG	Securities and Markets Stakeholder Group
SRI	Summary Risk Indicator
SRPs	Structured Retail Products
SRRI	Synthetic Risk and Reward Indicator
TER	Total Expense Ratio
TRV	Trends Risk and Vulnerabilities
UCITS	Undertaking for Collective Investment in Transferable Securities

Countries abbreviated in accordance with International Organization for Standardization standards
Currencies abbreviated in accordance with International Organization for Standardization standards