AIFMD REPORTING -Description of electronic reporting
Version 1.1.2 (16 JANUARY 2019)

REVISION HISTORY

Version	Date	Description of revision
1.0.0	11 July 2014 (valid from 22 July 2014)	First version
1.0.1	16 January 2015	Additions to and elaborations on the descriptions. Updated schema for the envelope. Corrections on Figures 1 and 2 and Examples 1, 2 and 3.
1.0.2	14 January 2016	Links into ESMAs web pages and 3.2.4 Basic header specifications updated
1.0.3	1 April 2016	XML example modifications (incl. deletion of unnecessary +/- characters) and addition of mandatory restrictions in chapter 7. File naming.
1.1.0	12 June 2018	Instructions made more specific: chapter 3.2 Envelope.
1.1.1	12 December 2018	Links updated: Chapter 3.2.1 Structure of an envelope and chapter 5 Use of reporting application.
1.1.2	16 January 2019	The appearance of the instruction has been updated.

CONTENTS

1 Introduction

AIFMD reporting means reporting as referred to in the AIFM Directive (2011/61/EU) and the European Commission Regulation (2013/231). The reporting obligations under the AIFM Directive have been implemented in national legislation (act 162/2014 on alternative investment fund managers and Ministry of Finance Degree 226/2014 on alternative investment fund managers).

Section 6 of FIN-FSA regulations and guidelines (4/2014) on alternative investment fund managers includes regulations and guidelines on AIFMD reporting. The regulations and guidelines incorporate the ESMA Guidelines on reporting obligations under Articles 3(3)(d) and 24(1), (2) and (4) of the AIFMD. The European Securities and Markets Authority (ESMA, http://www.esma.europa.eu) has also published technical guidance on electronic reporting.

The description of electronic reporting in connection of AIFMD reporting is used for creating and submitting AIFMD reporting information to FIN-FSA beginning with reporting on the situation at 30 September 2014. The description highlights the special national requirements that are not included in ESMA's technical guidance.

The information must be reported in XML (Extensible Markup Language), in accordance with ESMA requirements. The reports submitted to FIN-FSA can be created either by using the reporting application provided by FIN-FSA (incl. creation of report files, data validation as well as encryption and compression of submission files) or by the reporting entity's own means, based on the description issued.

2 Regularly reported information

Alternative investment fund managers (AIFMs) must regularly provide, for supervisory purposes, information on themselves and the alternative investment funds (AIFs) they manage. The content of the information, the reporting dates and reporting frequencies depend on the characteristics and amount of assets under management of the AIFM and the AIFs it manages.

The content of the information to be reported and the reporting frequency of the AIFM and each AIF are described in ESMA Guidelines [Tables 8-9-10 of Annex 2 of ESMA guidelines on reporting obligation (2013/1360)]. The parts of the submission container that are required by national supervisors and that are reported in addition to the files specified by ESMA are described in chapter 3 of this description (Submission file).

Changes affecting the reporting obligation must be separately notified to FIN-FSA. FIN-FSA recommends that reporting entities use the reporting obligation notification form, which is available on FIN-FSA's website (http://www.finanssivalvonta.fi/en/Regulation/International_Projects/AIFMD/reporting/Pages/Default.aspx). In the reporting, when changes in reporting obligations occur, ESMA guidance applies [Tables 8-9-10 of Annex 2 of ESMA guidelines on reporting obligation (2013/1360)]. ESMA Guidelines give examples of reporting in these situations [Guidelines on reporting obligations under Articles 3(3)(d) and 24(1), (2) and (4) of the AIFMD (2014/869)].

3 Submission file

3.1 Structure of a submission file

The file submitted to FIN-FSA (submission file) must be compressed into a zip file which includes an encrypted XML-format envelope (meta data and basic identification data) and a zipped and encrypted XML-format AIFMD report, which includes the actual data (AIFM report or AIF report which can contain information on one or several AIFs). The package submitted to FIN-FSA can include several separate zipped submission files, or the zipped submission files can be compressed into a zip file to be submitted to FIN-FSA (see Figure 1.).
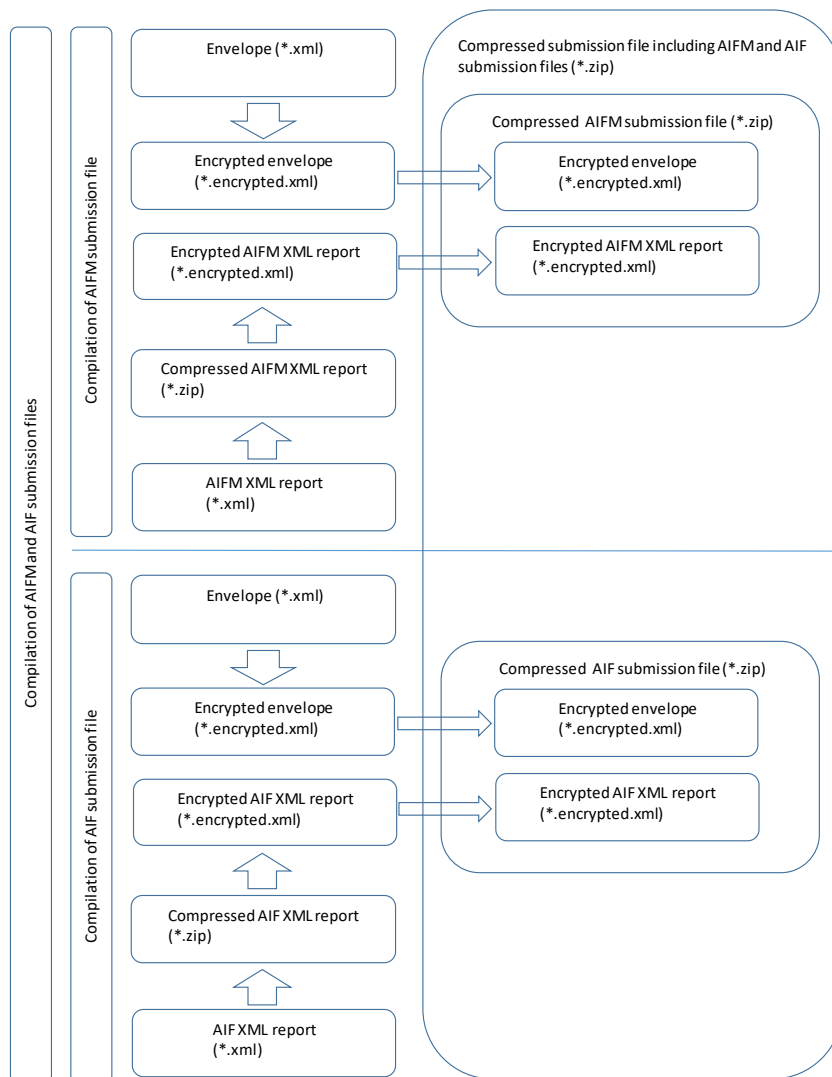

Figure 1. Structure of a submission file

3.2 Envelope

3.2.1 Structure of an envelope

In addition to the AIFMD reports, which accord with the ESMA descriptions, FIN-FSA requires a separate XML envelope.

FIN-FSA's instructions on the XML envelope are partly based on the specifications by the CEN project, which is preparing the standardisation of reporting (http://cen.eurofiling.info/wp-content/upLoads/data/CWA_XBRL_WI002-E.pdf). The envelope schema is available on FIN-FSA's website: the envelope schema.

The abbreviations used in the CEN project are as follows:

- CEN: **C**omité **E**uropéen de **N**ormalisation / European Committee for Standardization
- CWA: **C**EN **W**orkshop **A**greement

(source: http://cen.eurofiling.info/)

The envelope consists of the following parts:

- XML namespace specifications
- meta data specifications
- basic header specifications

3.2.2 XML namespace specifications

The name of the envelope begins with the schema instance specification and other namespace specifications, see chapter 3.2.1 Structure of an envelope.

Each XML file begins with an XML namespace specification. Namespaces are used to separate the concepts of different XML instances.

Example 1.

```
<?xml version="1.0" encoding="utf-8"?>
<FivaAIFMDHeader xmlns="http://www.fiva.fi/eu/fr/esrs/Header/FivaAIFMDHeader"
xmlns:bh="http://www.eurofiling.info/eu/fr/esrs/Header/BasicHeader"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance">
  <!-- Contents -->
</FivaAIFMDHeader>
```

3.2.3 Meta data specifications

The envelope must include the following meta data:

- InstanceCreationDateTime (yyyy-mm-ddThh:mm:ss), e.g. 2015-01-07T16:22:00+02:00, GMT + 02:00); date, on which the submission file has been created by the reporting entity
- ReportingPeriod (yyyy-mm-dd), e.g. 2014-12-31

- ReportingEntityType [TK-tunnus[1], Y-tunnus, LEI; varchar(9))
- ReportingEntity (TK-tunnus, Y-tunnus [2], LEI; varchar(50))
- TypeOfReportingInstitution[3] (nnn; varchar(9))
- ReportingApplicationName[4] (varchar(80))
- ReportingApplicationVersion[5] (varchar(40))
- ContactPersonFirstName (varchar(50))
- ContactPersonLastName varchar(50))
- ContactPersonEmail (varchar(100))
- ContactPersonTelephone (varchar(50))
- Comment (optional)
- TestFlag (production submission = false; test submission = true)

Reporting Entity means an alternative investment fund manager (AIFM).

Example 2.

```
InstanceCreationDateTime>2015-01-07T16:22:00+02:00</InstanceCreationDateTime>
<ReportingPeriod>2014-12-31</ReportingPeriod>
<ReportingEntityType>TK-tunnus</ReportingEntityType>
<ReportingEntity>9999999</ReportingEntity>
<TypeOfReportingInstitution>354</TypeOfReportingInstitution>
<ReportingApplicationName>ApplicationX</ReportingApplicationName>
<ReportingApplicationVersion>1.0.0</ReportingApplicationVersion>
<ContactPersonFirstName>Tylle</ContactPersonFirstName>
<ContactPersonLastName>Testaaja</ContactPersonLastName>
<ContactPersonEmail>tylle.testaaja@fiva.fi</ContactPersonEmail>
<ContactPersonTelephone>+358-00 000 0000</ContactPersonTelephone>
<Comment>Revision123</Comment>
<TestFlag>false</TestFlag>
```

3.2.4 Basic header specifications

The BasicHeader includes the following data:

- ReportReferenceID = Free form technical identifier that describes the contents of the information (included in the submission container) which is to be submitted.
- FilePath = A report file's name (incl. the filename extension) without file directory name.

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[1] ID code provided by FIN-FSA for reporting purposes; 7-character figure.
[2] National Business ID; 8-charater figure, entered without a hyphen separating the final control digit.
[3] http://www.finanssivalvonta.fi/en/Reporting/reporting_institutions/Pages/Default.aspx
[4] Name of reporting entity's own system when data are generated without the reporting application.
[5] Version of reporting entity's own system when data are generated without the reporting application.

Example 3.

```
<BasicHeader>
  <bh:ReportDataContext>
    <bh:ReportReferenceID>AIFMD_AIFM_00001</bh:ReportReferenceID>
  </bh:ReportDataContext>
  <bh:File>
    <bh:FilePath>AIF_354_9999999_20141231.encrypted.xml</bh:FilePath>
  </bh:File>
</BasicHeader>
```

3.3 AIFMD reports

3.3.1 Structure of AIFMD reports

The actual reported information required by ESMA guidelines is submitted in an AIFM report and an AIF report that can contain information on one or several AIFs. The structure of AIFMD reports with the main sections is described in Figure 2.

AIFM report

AIFMReportingInfo
AIFMRecordInfo tai CancellationAIFMRecordInfo
Assumptions
AIFMCompleteDescription
AIFMIdentifier
AIFMPrincipalMarkets
AIFMPrincipalInstruments
AIFMBaseCurrencyDescription

AIF report

AIFReportingInfo
AIFRecordInfo tai CancellationAIFRecordInfo
Assumptions
AIFCompleteDescription
AIFPrincipalInfo
AIFIdentification
ShareClassIdentification
AIFDescription
MainInstrumentsTraded
NAVGeographicalFocus
AUMGeographicalFocus
PrincipalExposures
MostImportantConcentration
AIFIndividualInfo
IndividualExposure
RiskProfile
StressTests
AIFLeverageInfo
AIFLeverageArticle24-2
AIFLeverageArticle24-4

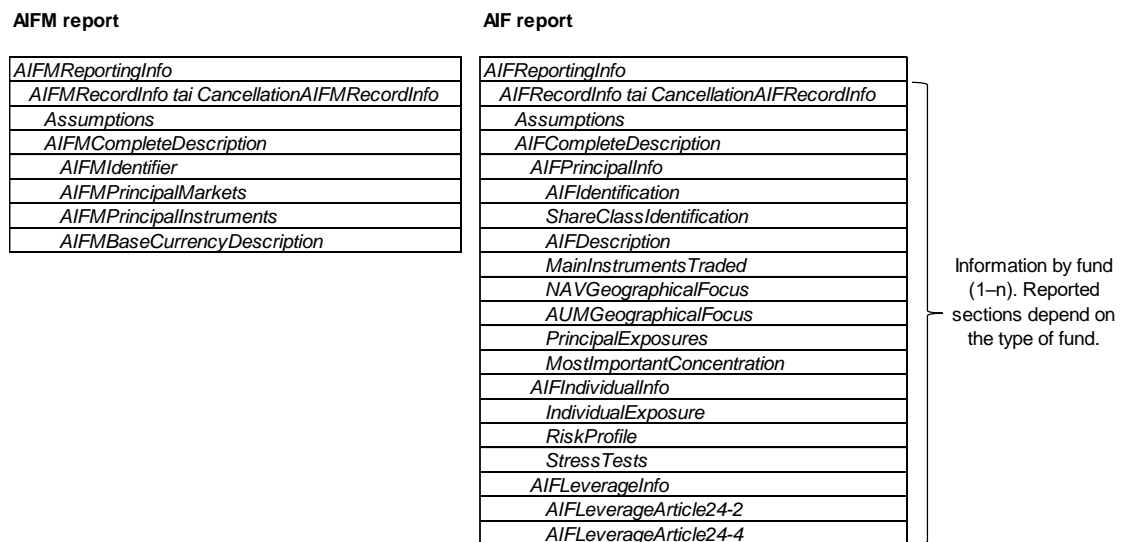Information by fund (1–n). Reported sections depend on the type of fund.

Figure 2. Structure of AIFMD reports: main sections (contents indicative)

More detailed template descriptions based on the information content of the reporting obligation are available in the ESMA reporting template document [Consolidated AIFMD reporting template (2013/1359)].

3.3.1.1 AIFM report

At the beginning of the AIFM report (XML), in the *AIFMReportingInfo* section, the following is reported: period when the information was created, home Member State (FI) of the receiving authority and the schema specification version used. ESMA's AIFMSample.xml:

```
<?xml version="1.0" encoding="UTF-8"?>
<!--Sample XML file generated by XMLSpy v2007 rel. 3 sp1 (http://www.altova.com)-->
```

```
<AIFMReportingInfo CreationDateAndTime="2014-01-26T15:55:02" Version="1.2"
ReportingMemberState="GB" xsi:noNamespaceSchemaLocation="AIFMD_DATMAN_V1.2.xsd"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance">
  <AIFMRecordInfo>
    <!-- Contents -->
  </AIFMRecordInfo>
  <CancellationAIFMRecordInfo>
    <!-- Contents -->
  </CancellationAIFMRecordInfo>
</AIFMReportingInfo>
```

The *AIFMRecordInfo* section includes the actual reported information. It includes, in addition to the AIFM identification information, reporting period and obligation information, the *Assumptions* and *AIFMCompleteDescription* sections. In reporting, the AIFM identification code must be the AIFM National Code provided by FIN-FSA.[6]

```
<AIFMRecordInfo>
  <FilingType>INIT</FilingType>
  <AIFMContentType>1</AIFMContentType>
  <ReportingPeriodStartDate>2014-10-01</ReportingPeriodStartDate>
  <ReportingPeriodEndDate>2014-12-31</ReportingPeriodEndDate>
  <ReportingPeriodType>Q4</ReportingPeriodType>
  <ReportingPeriodYear>2014</ReportingPeriodYear>
  <AIFMReportingObligationChangeFrequencyCode>
  QH</AIFMReportingObligationChangeFrequencyCode>
  <AIFMReportingObligationChangeQuarter>Q4</AIFMReportingObligationChangeQuarter>
  <LastReportingFlag>false</LastReportingFlag>
  <Assumptions>
    <!-- Contents -->
  </Assumptions>
  <AIFMReportingCode>4</AIFMReportingCode>
  <AIFMJurisdiction>GB</AIFMJurisdiction>
  <AIFMNationalCode>474286</AIFMNationalCode>
  <AIFMName>AIFM 1</AIFMName>
  <AIFMEEAFlag>true</AIFMEEAFlag>
  <AIFMNoReportingFlag>false</AIFMNoReportingFlag>
  <AIFMCompleteDescription>
    <!-- Contents -->
  </AIFMCompleteDescription>
</AIFMRecordInfo>
```

The *CancellationAIFMRecordInfo* section is reported instead of the *AIFMRecordInfo* section if correcting the previously reported information with a new submission is not possible and the submitted information must be completely cancelled. The cancellation of previously submitted information is possible in the case of a material error and/or if the error relates to the following unique data identified by the report (see below), and the cancellation must be agreed on separately with FIN-FSA.

- AIFM/AIF national code
- Reporting member state
- Reporting period
- Reporting year

3.3.1.2 AIF reports

An AIF report can contain the information reported by one or several AIFs. At the beginning of the AIF report (XML), in the *AIFReportingInfo* section, the following is

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[6] FIN-FSA provides reporting entities with the codes to be used. The AIFM National Code of a Finnish AIFM is the entity's National Business ID (Y-tunnus), entered without a hyphen separating the final control digit. Foreign AIFMs use the ID code provided by Statistics Finland/FIN-FSA for reporting purposes (TK-tunnus) as the AIFM National Code.

reported: period when the information was created, home Member State (FI) of the receiving authority and the schema specification version used. ESMA's AIFSample.xml:

```
<?xml version="1.0" encoding="UTF-8"?>
<!--Sample XML file generated by XMLSpy v2007 rel. 3 sp1 (http://www.altova.com)-->
<AIFReportingInfo ReportingMemberState="FR" Version="1.2" CreationDateAndTime="2001-
12-17T09:30:47.0Z" xsi:noNamespaceSchemaLocation="AIFMD_DATAIF_V1.2.xsd"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance">
  <AIFRecordInfo>
    <!-- Contents -->
  </AIFRecordInfo>
  <AIFRecordInfo>
    <!-- Contents -->
  </AIFRecordInfo>
  <AIFRecordInfo>
    <!-- Contents -->
  </AIFRecordInfo>
  <CancellationAIFRecordInfo>
    <!-- Contents -->
  </CancellationAIFRecordInfo>
  <CancellationAIFRecordInfo>
    <!-- Contents -->
  </CancellationAIFRecordInfo>
</AIFReportingInfo>
```

The *AIFRecordInfo* section includes the actual reported information. It includes, in addition to the AIF identification information, reporting period and obligation information, the *Assumptions* and *AIFCompleteDescription* section. In reporting, the AIF identification code must be the AIF National Code[7] provided by FIN-FSA. The AIF report file can contain 1–n *AIFRecordInfo* sections.

Information reported in the *AIFCompleteDescription* section is specified for each AIF separately, in accordance with the scope of the reporting obligation. The information content can have the following combinations:

- AIFMD 3(3)(d)
- AIFMD 24(1)
- AIFMD 24(1) + 24(2)
- AIFMD 24(1) + 24(2) + 24(4)
- AIFMD 24(1) + 24(4)

The *AIFCompleteDescription* section consists of the following sections

- *AIFPrincipalInfo* [information under AIFMD 24(1) / 3(3)(d)]
- *AIFIndividualInfo* [information under AIFMD 24(2)]
- *AIFLeverageInfo section's AIFLeverageArticle24-2* [information under AIFMD 24(2)]
- *AIFLeverageInfo section's AIFLeverageArticle24-4* [information under AIFMD 24(4)]

It is possible to report information under ESMA Opinion [Collection of information for the effective monitoring of systemic risk under Article 24(5), first sub-paragraph, of

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[7] FIN-FSA provides the reporting entity with the codes to be used. The AIF National Code of an AIF is the investment fund ID provided by FIN-FSA; in the format NNNNNNNN#NNN for AIFs managed by a domestic AIFM, and in the format NNNNNNN#NNN for AIFs managed by a foreign AIFM. First part of the ID = AIFM National Code of the AIFM.

the AIFMD (2013/1340)] even though FIN-FSA does not require separate reporting of the information.

The *CancellationAIFRecordInfo* section is reported on an AIF instead of the *AIFRecordInfo* section if correcting the previously reported information with a new submission is not possible and the submitted information must be completely cancelled. The cancellation of previously submitted information is possible in the case of a material error and/or if the error relates to the following unique data identified by the report (see below), and the cancellation must be agreed on separately with FIN-FSA.

- AIFM/AIF national code
- Reporting member state
- Reporting period
- Reporting year

The AIF report file can contain 1–n *AIFCancellationRecordInfo* sections.

3.3.2 Schema files of reporting

The structure of the content of the AIFM report is described in the file AIFMD_DATMAN_V1.2.xsd and that of the AIF report is described in the file AIFMD_DATAIF_V1.2.xsd. The data element specifications are common to both schemata, and they are described in the data type specification file AIFMD_REPORTING_DataTypes_V1.2.xsd. Schema files: AIFMD – Reporting – XML documents (2013/1361).

3.3.3 Reported values and precision

The data type specifications describe for each cell the data types, limit value and content requirements, eg selection lists used or the required form. The precision of the value reported in each cell is found in the schema files and in ESMA's technical reporting guidance [AIFMD reporting IT technical guidance (2013/1358)]. Monetary values must, as a rule, be reported in the base currency of the AIF.

Example 4.

```
<xs:simpleType name="PositionTypeType">
  <xs:annotation>
    <xs:documentation>
      Flag indicating whether the value is long (L) or short (S).
    </xs:documentation>
  </xs:annotation>
  <xs:restriction base="xs:string">
    <xs:enumeration value="L" />
    <xs:enumeration value="S" />
  </xs:restriction>
</xs:simpleType>
```

```
<xs:simpleType name="UnsignedInteger3pType">
  <xs:annotation>
    <xs:documentation>Format: Max 3(n).</xs:documentation>
  </xs:annotation>
```

```
  <xs:restriction base="xs:integer">
    <xs:totalDigits value="3" />
    <xs:fractionDigits value="0" />
    <xs:minInclusive value="1" />
  </xs:restriction>
</xs:simpleType>
<xs:simpleType name="UpperAlphanumericType">
  <xs:restriction base="xs:string">
    <xs:whiteSpace value="collapse" />
    <xs:pattern value="[0-9A-Z]+" />
  </xs:restriction>
</xs:simpleType>
```

The ESMA code lists and labels used in the reporting are described in ESMA technical documentation [Tables 1–7 of Annex 2 of ESMA Guidelines on reporting obligation (2013/1586)].

4 Encryption and compression

The envelope report and the zip-compressed AIFMD report must be encrypted before compression into a submission file (*.zip). For encryption, reporting entities can use the BOFCryptNxt program, which can be downloaded from the Jakelu Distribution Service. Encrypted files must have the file extension ".encrypted.xml". When using the reporting application, the submission file is created automatically (incl. compression and encryption).

5 Use of reporting application

With the reporting application, the reporting entity can generate the required submission file by entering the information into the Excel forms manually and by creating the submission file automatically, using the application's functions. Reporting entities can also download into the reporting application a complete or semicomplete XML report or CSV report from an external source, fill in any possible missing data and create the submission file automatically. The reporting applications and user instructions can be downloaded from the Jakelu Distribution Service (https://jakelu.finanssivalvonta.fi). FIN-FSA provides reporting entities with the necessary individual user ID and password.

6 Creating a submission file by other means

If the submission file is created by some means other than FIN-FSA's reporting application, the reporting entity must ensure that the file fulfils the requirements for the form of the XML schema files and the content integrity requirements included in ESMA's technical reporting guidance [AIFMD reporting IT technical guidance (2013/1358)].

7 File naming

The reported files should be named as follows:

- envelope
  - header_<module>_<typeofreportinginstitution>_<reportingentityId>_<period>.xml
- encrypted envelope
  - header_<module>_<typeofreportinginstitution>_<reportingentityId>_<period>.encrypted.xml
- AIFMD report

- o   <module>_<typeofreportinginstitution>_<reportingentityId>_<period>.xml
- encrypted AIFMD report
    - o   <module>_<typeofreportinginstitution>_<reportingentityId>_<period>.encrypted.xml
- submission file
    - o   container_<module>_<reportingentityId>_<period>.zip
- submission file including several submission files
    - o   <AIFMD>_<id>.zip

The parts of the file names signify the following:

- header: ID of the envelope: *header*
- <module>:   AIFM report: *AIFM* or AIF report: *AIF*
- <typeofreportinginstitution>   Type of reporting institution of AIFM
- <reportingentityId>:   ID of the AIFM (LEI/TK-tunnus/Y-tunnus)
- <period>:   date of reported information (yyyymmdd)
- <container>:   ID of the submission file: *container*
- AIFMD: ID of a file containing several submission
    files:

                                               AIFMD
- <id>:   free-form ID, e.g. consecutive number

Mandatory restrictions:

File extensions:

- envelope: ".xml"
- AIFM and AIF XML report: ".xml"
- submission file: ".zip"

Name of encrypted envelope/AIFM and AIF XML report:

- "[original name].encrypted.xml"
- maximum length 150 characters
- the name must be unique within the submission batch

8 Submission of the reported data to FIN-FSA

The submission file (zip) is submitted as an email attachment.

9 Further information

If you have any further inquiries, please send them to
AIFMDReportingHelpdesk[at]finanssivalvonta.fi.