

26 October 2021

Reporting according to Annex IV to Article 3 and 24 of the Commission Delegated Regulation (EU) No 231/2013 supplementing Directive 2011/61/EU and Annex 5 to Appendix 13 of the Investment Services Rules for Investment Services Providers Qualifying as AIFMs and De-Minimis AIFMs (“**AIFMD Reporting**”) – New Validation Rules on the Reporting Files

The Authority has introduced additional validation rules to improve the data quality of the AIFMD Reporting submissions made by a fund manager or a self-managed fund subject to the AIFMD reporting obligations (the “**AIFM**”). A new set of validations on the structure of the reporting files have been implemented by the MFSA to ensure that the AIFM and the person appointed by the AIFM to submit the file on the MFSA’s Licence Holder Portal (the “**appointed sender**”) take action to verify and address common errors at upload stage, specifically relating to:

1. The correct application of the file naming conventions, as stipulated in the [Reporting Guidelines for Investment Fund Managers](#);
2. The removal of complex folder structures within the zip file;
3. Restrictions on forbidden file types;
4. Restrictions on password protected files; and
5. Reporting date consistency between the Zip file and the dates reported in the reports.

Every AIFM/appointed sender is kindly requested to refer to the automated message received via email for any upload failures and re-upload the file until all the required validations have been satisfied. This does not exclude that the AIFM/appointed sender can subsequently receive further validation errors relating to the processing of the Annex IV reporting file(s) by ESMA. It is pertinent to note that unless the status of the Annex IV file is “ACCEPTED BY ESA”, the AIFM would not be considered compliant with the applicable reporting requirements.

Where the AIFM or the appointed sender encounter problems with the feedback files and/or error messages, it is invited to inform its reporting service provider thereof and/or to contact the MFSA by sending an email exclusively to aifmdreporting@mfsa.mt.