

17 April 2025

Circular on Various Aspects Concerning the Submission of Financial Documentation through the LH Portal by Fund Managers, Collective Investment Schemes and Recognised Persons

Reference is made to the MFSA's [Circular](#) dated 30 June 2023, which pertains to the naming conventions for regulatory submissions by **Fund Managers, Collective Investment Schemes, and Recognised Persons (collectively referred to as "Licence Holders") submitted through the CISRP or Fund Manager's project on the MFSA's LH Portal.**

This Circular aims at providing additional clarification on the requirements to ensure that high data quality standards are maintained. The circular also aims to provide additional awareness by highlighting common errors.

1. Naming Conventions

Licence holders are reminded to adopt the naming conventions stipulated in Annex I at the end of this Circular when submitting the required documentation.

1.1. Reporting Period

The Authority has observed that the submission period is sometimes used interchangeably within the file naming convention instead of the financial reporting period to which the submission pertains, leading to processing delays and misclassification of files.

For example, when a licence holder (Entity Code: ABCD) submits the Management Letter for the financial year ending **31 December 2024**, the appropriate naming convention is as follows:

ZIP File: ABCD_DEC2024_AFD

Individual File: ABCD_DEC2024_ML

1.2. Mislabelling Documents

A recurring issue has been the incorrect labelling of documents which may result in in misplacement of submissions within the Authority's records. This is especially common in the case for the following documents.

Document	Description	Correct naming convention of document
Fund Return Representation Sheet	It is part of the Annual Fund Return and to be signed by at least two directors.	_RS
Auditor's Report on the Fund Return	Document signed by the Auditors.	_ARFR
Letter of Representation (optional submission)	Letter of Representation is a written statement signed by the company's management that confirms the accuracy and completeness of the financial statements.	_OTH

Additionally, any documentation that is required to be submitted to the Authority but is not listed in [Annex I](#) should be compiled into a **ZIP file** and submitted using the following naming format: **EntityCode_ReportingPeriod_OTH.zip**

2. Data Quality Issues

2.1. MFSA 4-Digit Code within the Annual Fund Return for CISs.

In the "Cover Sheet" tab of the Annual Fund Return, specifically the "Licence Holder Code" field, the code inputted should be the 4-digit code found on the [Financial Services Register](#), not any other registration number.

Should you have any queries in relation to the above, please do not hesitate to contact funds@mfsa.mt.