

Reporting Guidelines for Notified Professional Investor Funds

GUIDANCE NOTE

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REVISIONS LOG



VERSION	DATE ISSUED	DETAILS
1.00	18 Dec 2023	Guidance Note Issued

In terms of Section 3 of Part B of the Notified PIF Rules, Notified PIFs are required to regularly report to the MFSA information with respect to their investment strategy and portfolio composition through the submission of a dedicated Annex.

As outlined in Rule 3.03, whilst Notified PIFs managed by local *de minimis* AIFMs are exempt from such reporting requirement, NPIFs managed by EU small AIFMs and third-country managers shall submit the “**Annex 2 – AIF – Specific Information to be reported (Article 3(3) and Article 24(1) AIFMD)**” (‘Annex 2’) – available on the MFSA website through this [link](#).

Notified PIFs should note that the specific sub-funds/compartments shall be considered as distinct NPIFs for the purposes of the regulatory returns, and therefore a separate Annex 2 file should be submitted for each sub-fund/compartment.

When compiling the regulatory return, NPIFs should refer to the applicable sections of ESMA’s AIFMD Reporting IT Technical Guidance (‘ESMA Technical Guidance’).¹ That being stated, the exceptions outlined hereunder in this Guidance Note shall apply when completing Annex 2 with respect to a Notified PIF:

¹ AIFMD reporting IT technical guidance (rev 6) [updated] available at:
<https://www.esma.europa.eu/document/aifmd-reporting-it-technical-guidance-rev-6-updated>

Field Number	Notes
General	Reference to 'AIF' throughout this spreadsheet has to be understood as a reference to the NPIF in respect of which Annex 2 is filled in.
1 – Reporting Member State	The reporting Member State Code with respect to the filling of NPIFs returns to the MFSA is MT
5 – AIF Content Type	Not Applicable to NPIFs
10/11 – Change in reporting obligation frequency/contents Code	Not Applicable to NPIFs
12 – Change in AIF reporting obligation quarter	Not Applicable to NPIFs
16 – AIFM National Code	The AIFM National Code shall tantamount to the name of the NPIF Manager for Annex 2 returns in relation to NPIFs.
17 – AIF National Code	NPIFs should provide the code received by the MFSA upon inclusion in NPIF register. The National Code of the Sub-Funds of a NPIF is the registration code followed by a letter such as A, B, C, etc. It is important that the codes are used consistently across all submissions.
21 – Domicile of the AIF	The domicile of the AIF with respect to the filling of NPIFs returns to the MFSA is MT .

25-30 ISIN/CUSIP/SEDOL/Bloomberg/Reuters/ECB codes	-	AIF	Optional for NPIFs.
33-40 – Share class identification codes			Not Applicable to NPIFs
62 – number of transactions under HFT			Not Applicable to NPIFs
63 – market value of buys and sells in base currency under HFT			Not Applicable to NPIFs
77 – hedging % for short position			Not Applicable to NPIFs
86-93 – geographical breakdown of the investments held by percentage of the total aggregated value			Not Applicable to NPIFs
114-117 – principal markets in which AIF trades			Not Applicable to NPIFs
120 – investor concentration – retail investors			Not Applicable to NPIFs

Details on the procedure to be followed on the Licence Holder Portal ('LH Portal') to submit Annex 2 will be communicated successively under separate cover.

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