

IMPORTANT GABRIEL INFORMATION FOR AIFMD ANNEX IV TRANSPARENCY REPORTING

INTRODUCTION

These Questions and Answers (Q&As) give information to Alternative Investment Fund Managers (AIFMs) who may encounter problems when attempting to view AIF002 Fund Transparency Report schedules on GABRIEL. Appendix 1 contains GABRIEL screen shots to further help AIFMs in using the GABRIEL system.

They are for:

- full-scope UK AIFMs, small authorised UK AIFMs and small registered UK AIFMs
- above-threshold non-EEA AIFMs and small non-EEA AIFMs marketing in the UK under the UK National Private Placement Regime
- UK authorised firms, not yet authorised as AIFMs, that have managed AIFs before 22 July 2013 and applied to the FCA to be authorised with a managing AIFs permission before the end of the transitional year which ran to 22 July 2014

These Q&As will enable AIFMs to understand the steps they must take to comply with our transparency reporting requirements in situations where:

For a UK AIFM

- no AIF002 Fund Transparency Reports are showing in GABRIEL for the reporting period to 31 December 2014 but the AIFM has managed one or more AIF during that time, or
- too few AIF002 Fund Transparency Reports are scheduled in GABRIEL for the reporting period to 31 December 2014 given the AIFs managed during that time, or
- too many AIF002 Fund Transparency Reports are scheduled in GABRIEL for the reporting period to 31 December 2014 given the AIFs managed during that time

For a non-EEA AIFM

- no AIF002 Fund Transparency Reports are scheduled in GABRIEL for the reporting period to 31 December 2014 but the AIFM has marketed one or more AIFs in the UK under the UK National Private Placement Regime during that time

and/or the AIFM remains obliged to submit transparency information for one or more AIF previously marketed in the UK¹, or

- too few AIF002 Fund Transparency Reports are scheduled in GABRIEL for the reporting period to 31 December 2014 given the AIFs marketed in the UK under the UK National Private Placement Regime during that time and/or in relation to the AIFM's continuing obligations to submit transparency information for one or more AIF previously marketed in the UK², or
- too many AIF002 Fund Transparency Reports are scheduled in GABRIEL for the reporting period to 31 December 2014 given the AIFs marketed in the UK under the UK National Private Placement Regime during that time and/or in relation to the AIFM's continuing obligations to submit transparency information for one or more AIF previously marketed in the UK³

All AIFMs remain responsible for knowing:

- how the FCA's transparency reporting requirements apply to them in their own particular circumstances
- what transparency information has to be reported – in particular in respect of AIFs that were managed during the reporting period
- when transparency information has to be reported and the associated reporting deadlines, and
- the procedures for reporting transparency information to the FCA

These Q&As do not constitute FCA rules or guidance. For further information on reporting transparency information please see:

- [Reporting Transparency Information to the FCA – Questions and Answers](#). (This document includes an appendix of GABRIEL screen shots to help AIFMs navigate through the system and submit transparency reports)
- [Reporting Annex IV Transparency Information under the Alternative Investment Fund Managers Directive – for full-scope UK AIFMs, small authorised UK AIFMs and Small Registered UK AIFMs](#).

¹ Please see our response to question 20 in [Reporting Transparency Information to the FCA – Questions and Answers](#) for further information on the continuing obligations for non-EEA AIFMs to submit transparency information for an AIF previously marketed in the UK.

² Please see our response to question 20 in [Reporting Transparency Information to the FCA – Questions and Answers](#) for further information on the continuing obligations for non-EEA AIFMs to submit transparency information for an AIF previously marketed in the UK.

³ Please see our response to question 20 in [Reporting Transparency Information to the FCA – Questions and Answers](#) for further information on the continuing obligations for non-EEA AIFMs to submit transparency information for an AIF previously marketed in the UK.

- [Reporting Annex IV Transparency Information under the Alternative Investment Fund Managers Directive – for small non-EEA AIFMs and above-threshold non-EEA AIFMDs marketing in the UK under the UK National Private Placement Regime.](#)

CONTENTS

	FIRMS TO WHOM THE QUESTION APPLIES	QUESTION
1	UK and non-EEA AIFMs	Is an AIFM required to submit transparency information if it does not have access to GABRIEL?
2	UK and non-EEA AIFMs	Do AIFMs have to register with GABRIEL?
3	UK and non-EEA AIFMs	Is an AIFM only required to submit transparency information for the AIF002 Fund Transparency Reports as scheduled in GABRIEL for the reporting period?
4	UK authorised firms using transitionals	Does a UK authorised firm, not yet authorised as an AIFM, but making use of the amended transitional arrangements have any obligations in respect of the reporting period to 31 December 2014?
5	UK AIFMs	What should an AIFM do if there are no AIF002 Fund Transparency Reports scheduled in GABRIEL for the reporting period but one or more AIF was managed during that time?
6	UK AIFMs	What should an AIFM do if there are too few AIF002 Fund Transparency Reports scheduled in GABRIEL for the reporting period given the AIFs managed during that time?
7	UK AIFMs	What should an AIFM do if there are too many AIF002 Fund Transparency Reports scheduled in GABRIEL for the reporting period given the AIFs managed during that time?
8	Non-EEA AIFMs	What should an AIFM do if there are no AIF002 Fund Transparency Reports scheduled in GABRIEL for the reporting period but one or more AIF was marketed in the UK under the UK National Private Placement Regime during that time and/or the AIFM remains obliged to submit transparency information for one or more AIF previously marketed in the UK*?
9	Non-EEA AIFMs	What should an AIFM do if there are too few AIF002 Fund Transparency Reports scheduled in GABRIEL for the reporting period given the AIFs marketed in the UK under the UK National Private Placement Regime during that time and/or the AIFM's continuing obligations to submit transparency information for one or more AIF previously marketed in the UK*?
10	Non-EEA AIFMs	What should an AIFM do if there are too many AIF002 Fund Transparency Reports scheduled in GABRIEL for the reporting period given the AIFs marketed in the UK under the UK National Private Placement Regime during that time and/or the AIFM's continuing obligations to submit transparency information for one or more AIF previously marketed in the UK⁴?
11	All firms	What should an AIFM do if it wishes to submit an AIF002 NIL return?

⁴ Please see our response to question 20 in [Reporting Transparency Information to the FCA – Questions and Answers](#) for further information on the continuing obligations for non-EEA AIFMs to submit transparency information for an AIF previously marketed in the UK.

1. [UK and non-EEA AIFMs] Is an AIFM required to submit transparency information if it does not have access to GABRIEL?

Answer

- a) Yes, an AIFM that is obliged to report transparency information for the reporting period to 31 December 2014 remains responsible for submitting it on or before the reporting deadline.
- b) We will only accept transparency information submitted via GABRIEL and have made efforts to ensure all AIFMs have access by emailing registration keys to all AIFMs not previously registered.
- c) AIFMs will need to use the GABRIEL registration key to gain access to GABRIEL itself. We will not accept the failure to register on GABRIEL as a legitimate reason for not submitting transparency information.
- d) If an AIFM believes it has not received a GABRIEL registration key it should first check with the user of the email address stated as the point of contact within the submitted AIFMD application (NPPR notification for non-EEA AIFMs) as registration keys will have been sent to that user.

2. [UK and non-EEA AIFMs] Do AIFMs have to register with GABRIEL?

Answer

- a) Yes, we will only accept transparency information submitted via GABRIEL. We will not accept the failure to register on GABRIEL as a legitimate reason for not submitting transparency information.

3. [UK and non-EEA AIFMs] Is an AIFM only required to submit transparency information for the AIF002 Fund Transparency Reports that are showing in GABRIEL for the reporting period?

Answer

- a) Not necessarily. The initial schedule of reporting obligations showing in GABRIEL has been established by the FCA based on information available at the date of authorisation, registration or notification, and by taking into account any subsequent material changes.
- b) However, given the volume of data processed we acknowledge that the scheduled AIF002 Fund Transparency Reports may not be fully accurate and should not be relied on as being correct.
- c) Each AIFM is responsible for ensuring the AIF002 Fund Transparency Report schedule accurately records the actual obligation of the AIFM.

- d) Our responses to questions 5 to 7 for UK AIFMs and questions 8 to 10 for non-EEA AIFMs below confirm what an AIFM must do if it discovers that its AIF002 Fund Transparency Report schedule is not accurate.

4. [UK authorised firms using transitionals] Does a UK authorised firm, not yet authorised as an AIFM, but making use of the amended transitional arrangements have any obligations in respect of the reporting period to 31 December 2014?

Answer

- a) Yes. See question 38 of [Reporting Transparency Information to the FCA – Questions and Answers](#).
- b) In particular we consider that the reporting obligations of all firms operating under the amended transitional arrangements started on 1 October 2014 and therefore these firms will have transparency information to report for the period ending 31 December 2014.
- c) This will include:
- AIFs managed during the reporting period that remain managed by the AIFM.
 - AIFs managed during part of the reporting period but where management ceased prior to the end of the reporting period – for example because the AIF was wound up or else transferred to be managed by another AIFM.
- d) We expect that all existing UK authorised firms, making use of the amended transitional arrangements, are existing GABRIEL users. To add AIF002 Fund Transparency Reports to the GABRIEL schedule, see question 5 below.

5. [UK AIFMs only] What should an AIFM do if there are no AIF002 Fund Transparency Reports scheduled in GABRIEL for the reporting period but one or more AIF was managed during that time?

Answer

- a) We are aware that some AIF002 Fund Transparency Reports are not visible for the reporting period to 31 December 2014 but are visible for the subsequent reporting period. AIFMs will therefore need to verify whether AIF002 Fund Transparency Reports are visible in the schedule for the next reporting period.
- b) For help with GABRIEL please refer to [Reporting Transparency Information to the FCA – Questions and Answers](#). This document includes an appendix of GABRIEL screen shots to help AIFMs navigate through the system and submit transparency reports.

Verification process

- (i) Log into GABRIEL to view the 'Firm Schedule – Reporting Period' screen.
 - (ii) Click 'Return due 30/07/2015' (if a full-scope UK AIFM) or 'Return due 30/01/2016' (if a small authorised or small registered AIFM) to see the 'Firm Schedule – Data Items in Reporting Period' screen for that subsequent reporting period.
 - (iii) Click 'Fund Details' which is located to the right of the 'AIF002 AIFM – Fund Data' item, to view the 'Fund details' screen.
 - (iv) If AIFs and PRNs are visible then follow 'c) AIFs are visible' below. If AIFs and PRNs are not visible then follow 'd) AIFs are not visible' below.
- c) AIFs are visible:
- (i) Make a note of the PRN and fund name assigned to each AIF as set out in the 'Fund details' screen.
 - (ii) On the left side of the screen are a number of options including one titled 'AIFMD' which should be selected. This will navigate to the 'Report under AIFMD' screen.
 - (iii) Click on 'AIF002 – Fund Transparency Report' to add a new fund report. Provide the mandatory information in the 'Basic information' tab, denoted by an '*', including the AIF's PRN and ensuring 31 December 2014 is entered as the end of the reporting period. Save the session at this point using the 'Save as draft' button at the bottom of the screen; this will create the AIF002 Fund Transparency Report for the first AIF with draft status.
 - (iv) Repeat step (iii) above for all other AIFs which, once completed, will be listed on the 'Report under AIFMD' screen.
 - (v) Complete in full the AIF002 Fund Transparency Report for the first AIF you have entered onto GABRIEL by selecting the link for the PRN you have entered from the 'Report under AIFMD' screen and using the 'validate and save' button to identify any validation errors. When no validation errors remain the report can be submitted to the FCA.
 - (vi) Repeat step (v) above for all other AIFs.
 - (vii) Once this has been completed (as well as the AIF001 return) please click on the link of relevant 'Return Due Date' and notify us that you have completed your submissions by putting a tick next to the AIF001 and/or AIF002 return and clicking on the 'Submit' button.

Please note that if you have XML files to upload then you will need to include the relevant PRN's for your funds in the 'AIFNationalCode' and 'AIFName' sections. To load the files please use the 'Upload AIFMD XML' option. If the file has failed validation you will be able to view this in the 'Report under AIFMD' screen, otherwise it will be in the 'AIFMD Submission History'.

d) AIFs are not visible:

- (i) On the left side of the screen are options, including one titled 'AIFMD', which should be selected. This will navigate to the 'Report under AIFMD' screen.
- (ii) Click on 'AIF002 – Fund Transparency Report' to add a new fund report. Provide the mandatory information in the 'Basic information' tab that is denoted by an '*', with the exception of the PRN, but ensure 31 December 2014 is entered as the end of the reporting period. Enter a six digit number as a proxy for the PRN in the relevant field. Save the session at this point using the 'Save as draft' button at the bottom of the screen; this will create the AIF002 Fund Transparency Report for the first AIF with draft status.
- (iii) Repeat step (ii) above for all other AIFs. This will include:
 - AIFs managed during the reporting period that remain managed by the AIFM.
 - AIFs managed during part of the reporting period but where management ceased prior to the end of the reporting period – for example because the AIF was wound up or else transferred to be managed by another AIFM.
- (iv) Complete in full the AIF002 Fund Transparency Report for the first AIF you have entered onto GABRIEL by selecting the link for the PRN you have entered from the 'Report under AIFMD' screen and using the 'validate and save' button to identify any validation errors. Resolve all errors with the exception of the PRN validation error.
- (v) Repeat step (iv) above for all other AIFs.
- (vi) Once this has been completed (as well as the AIF001 return) please click on the link of relevant 'Return Due Date' and notify us that you have completed your submissions by putting a tick next to the AIF001 and/or AIF002 return and clicking on the 'Submit' button.
- (vii) In these circumstances we will regard the AIFM as having met its AIF002 reporting obligations if:

- The AIF002 Fund Transparency Reports for AIFs are completed in full with the exception of the PRN where a six digit number is used as a proxy.
- The only unresolved validation errors relate to PRNs.
- This is carried out before the end of the reporting deadline.

(viii) We will be able to search GABRIEL to identify AIFs without known PRNs so long as the process above is followed. We will then liaise with AIFMs to ensure AIFs without known PRNs are resolved as quickly as possible.

(ix) At the point that PRNs are assigned to the AIFs, the AIFM will need to enter the relevant PRN to each draft status AIF002 Fund Transparency Report. This will then enable the AIFM to validate the report and formally submit the data to the FCA.

6. [UK AIFMs only] What should an AIFM do if there are too few AIF002 Fund Transparency Reports scheduled in GABRIEL for the reporting period given the AIFs managed during that time?

Answer

- a) The steps outlined in part d) in our response to question 5 should be followed.
- b) For help with GABRIEL please refer to [Reporting Transparency Information to the FCA – Questions and Answers](#). This document includes an appendix of GABRIEL screen shots to help AIFMs navigate through the system and submit transparency reports.

7. [UK AIFMs only] What should an AIFM do if there are too many AIF002 Fund Transparency Reports scheduled in GABRIEL for the reporting period given the AIFs managed during that time?

Answer

- a) For help with GABRIEL please refer to [Reporting Transparency Information to the FCA – Questions and Answers](#). This document includes an appendix of GABRIEL screen shots to help AIFMs navigate through the system and submit transparency reports.
- b) Complete, validate and submit all relevant AIF002 Fund Transparency Reports.
- c) Where the AIFM has identified an erroneous AIF002 fund being listed within its schedule the firm can remove this by doing the following:

- (i) Input the mandatory information on the 'Basic information' tab, denoted by an '*', including the AIF's PRN that you wish to remove and ensuring 31 December 2014 is entered as the end of the reporting period.
- (ii) Set the 'Is this the last report you will make for this fund?' to 'Yes' if using the screen in GABRIEL (this is question 25 on the fund screen in GABRIEL or ESMA's data reference number 13).
- (iii) Set the 'Do you have no fund information to report?' to 'yes' (this is question 26 on the fund screen in GABRIEL or ESMA's data reference number 23).
- (iv) The Report also enables AIFMs to summarise any assumptions made using section 248 in the GABRIEL screen. In this particular scenario the AIFM should:
 - Enter the field reference number relating to 'Is this the last report you will make for this fund?' for the ESMA item number which is 13.
 - In the description of assumption please enter 'AIF002 correction' followed by a brief rationale of the reason why the AIFM should not have to submit transparency information in relation to the AIF. This is subject to a limit of 300 characters.

This [link](#) is an example of the XML to use if you wish to use this method instead to remove the funds from your schedule

- d) The rationale provided by the AIFM for not having to complete in full an AIF002 Fund Transparency Report for a particular AIF must not conflict with the requirements established by Articles 3 (Exemptions) and 24 (Transparency Requirements) of the AIFMD. This document's Introduction section provides links to further relevant information.
- e) We will review AIF002 Fund Transparency Reports submitted in this way on a case-by-case basis. We may therefore ask AIFMs for further information to ensure this functionality has been used correctly.

8. [Non-EEA AIFMs only] What should an AIFM do if there are no AIF002 Fund Transparency Reports scheduled in GABRIEL for the reporting period but one or more AIF was marketed in the UK under the UK National Private Placement Regime during that time and/or the AIFM

remains obliged to submit transparency information for one or more AIF previously marketed in the UK⁵?

Answer

- a) We are aware that some funds for AIF002 Fund Transparency Reports are not visible for the reporting period to 31 December 2014 but are visible for the subsequent reporting period. AIFMs will therefore need to verify whether AIF002 Fund Transparency Reports are visible in the schedule for the next reporting period.
- b) For help with GABRIEL please refer to [Reporting Transparency Information to the FCA – Questions and Answers](#). This document includes an appendix of GABRIEL screenshots to help AIFMs navigate through the system and submit transparency reports.

Verification process

- (i) Log into GABRIEL in order to view the 'Firm Schedule – Reporting Period' screen.
 - (ii) Click 'Return due 30/07/2015' (if an above-threshold non-EEA AIFM) or 'Return due 30/01/2016' (if a small non-EEA AIFM) in order to view the 'Firm Schedule – Data Items in Reporting Period' screen for that subsequent reporting period.
 - (iii) Click 'Fund Details' which is located to the right of the 'AIF002 AIFM – Fund Data' item, in order to view the 'Fund details' screen.
 - (iv) If AIFs and PRNs are visible then follow 'c) AIFs are visible' below. If AIFs and PRNs are not visible then follow 'd) AIFs are not visible' below.
- c) AIFs are visible:
- (i) Make a note of the PRN assigned to each AIF as set out in the 'Fund details' screen.
 - (ii) On the left side of the screen are a number of options including one called 'AIFMD' which should be selected. This will navigate to the 'Report under Alternative Investment Fund Managers Directive' screen.
 - (iii) Click on 'AIF002 – Fund Transparency Report' to add a new fund report. Provide the mandatory information in the 'Basic information'

⁵ Please see our response to question 20 in [Reporting Transparency Information to the FCA – Questions and Answers](#) for further information on the continuing obligations for non-EEA AIFMs to submit transparency information for an AIF previously marketed in the UK.

tab, denoted by an '*', including the AIF's PRN and ensuring 31 December 2014 is entered as the end of the reporting period. Save the session at this point using the 'Save as draft' button at the bottom of the screen; this will create the AIF002 Fund Transparency Report for the first AIF with draft status.

(iv) Repeat step (iii) above for all other AIFs which, once completed, will be listed on the 'Report under AIFMD' screen.

(v) Complete in full the AIF002 Fund Transparency Report for the first AIF you have entered onto GABRIEL by selecting the link for the PRN you have entered from the 'Report under AIFMD' screen and using the 'validate and save' button to identify any validation errors. When no validation errors remain the report can be submitted to the FCA.

(vi) Repeat step (v) above for all other AIFs.

(vii) Once this has been completed (as well as the AIF001 return) please click on the link of relevant 'Return Due Date' and notify us that you have completed your submissions by putting a tick next to the AIF001 and/or AIF002 return and clicking on the 'Submit' button.

d) AIFs are not visible:

(i) On the left side of the screen are options including one titled 'AIFMD', which should be selected. This will navigate to the 'Report under Alternative Investment Fund Managers Directive' screen.

(ii) Click on 'AIF002 – Fund Transparency Report' to add a new fund report. Provide the mandatory information in the 'Basic information' tab that is denoted by an '*', with the exception of the PRN, but ensure 31 December 2014 is entered as the end of the reporting period. Enter a six digit number as a proxy for the PRN in the relevant field. Save the session at this point using the 'Save as draft' button at the bottom of the screen; this will create the AIF002 Fund Transparency Report for the first AIF with draft status.

(iii) Repeat step (ii) above for all other AIFs.

(iv) Complete in full the AIF002 Fund Transparency Report for the first AIF you have entered onto GABRIEL by selecting the link for the PRN you have entered from the 'Report under AIFMD' screen and using the 'validate and save' button to identify any validation errors. Resolve all errors with the exception of the PRN validation error.

(v) Repeat step (iv) above for all other AIFs.

(vi) In these circumstances we will regard the AIFM as having met its AIF002 reporting obligations if:

- The AIF002 Fund Transparency Reports for AIFs are completed in full with the exception of the PRN where a six digit number is used as a proxy.
- The only unresolved validation errors relate to PRNs.
- This is carried out before the end of the reporting deadline.

(vii) We will be able to search GABRIEL to identify AIFs without known PRNs so long as the process above is followed. We will then liaise with AIFMs to ensure AIFs without known PRNs are resolved as quickly as possible.

(viii) At the point that PRNs are assigned to the AIFs, the AIFM will need to enter the relevant PRN to each draft status AIF002 Fund Transparency report. This will then enable the AIFM to validate the report and formally submit the data to the FCA.

9. [Non-EEA AIFMs only] What should an AIFM do if there are too few AIF002 Fund Transparency Reports scheduled in GABRIEL for the reporting period given the AIFs marketed in the UK under the UK National Private Placement Regime during that time and/or the AIFM's continuing obligations to submit transparency information for one or more AIF previously marketed in the UK⁶?

Answer

- a) The steps outlined in part d) in our response to question 8 should be followed.
- b) For help with GABRIEL please refer to [Reporting Transparency Information to the FCA – Questions and Answers](#). This document includes an appendix of GABRIEL screenshots to help AIFMs navigate through the system and submit transparency reports.

10. [Non-EEA AIFMs only] What should an AIFM do if there are too many AIF002 Fund Transparency Reports scheduled in GABRIEL for the reporting period given the AIFs marketed in the UK under the UK National Private Placement Regime during that time and/or the AIFM's

⁶Please see our response to question 20 in [Reporting Transparency Information to the FCA – Questions and Answers](#) for further information on the continuing obligations for non-EEA AIFMs to submit transparency information for an AIF previously marketed in the UK.

continuing obligations to submit transparency information for one or more AIF previously marketed in the UK⁷?

Answer

- a) For help with GABRIEL please refer to [Reporting Transparency Information to the FCA – Questions and Answers](#). This document includes an appendix of GABRIEL screenshots to help AIFMs navigate through the system and submit transparency reports.
- b) Complete, validate and submit all relevant AIF002 Fund Transparency Reports.
- c) Where the AIFM has identified an erroneous AIF002 Fund Transparency Report it should take the following steps:
 - (i) Input the mandatory information on the 'Basic information' tab, denoted by an '*', including the AIF's PRN that you wish to remove and ensuring 31 December 2014 is entered as the end of the reporting period.
 - (ii) Set the 'Is this the last report you will make for this fund?' to 'Yes' if using the screen in GABRIEL (this is question 25 on the fund screen in GABRIEL or ESMA's data reference number 13).
 - (iii) Set the 'Do you have no fund information to report?' to 'yes' (this is question 26 on the fund screen in GABRIEL or ESMA's data reference number 23).
 - (iv) The Report also enables AIFMs to summarise any assumptions made using section 248 in the GABRIEL screen. In this particular scenario the AIFM should:
 - Enter the field reference number relating to 'Is this the last report you will make for this fund?' for the ESMA item number which is 13.

In the description of assumption please enter 'AIF002 correction' followed by a brief rationale of the reason why the AIFM should not have to submit transparency information in relation to the AIF. This is subject to a limit of 300 characters.

This [link](#) is an example of the XML to use if you wish to use this method instead to remove the funds from your schedule.

⁷ Please see our response to question 20 in [Reporting Transparency Information to the FCA – Questions and Answers](#) for further information on the continuing obligations for non-EEA AIFMs to submit transparency information for an AIF previously marketed in the UK.

d) The rationale provided by the AIFM for not having to complete in full an AIF002 Fund Transparency Report for a particular AIF must not conflict with the requirements established by:

(i) Articles 3 (Exemptions) and 24 (Transparency Requirements) of the AIFMD.

(ii) Regulation 58 (for small non-EEA AIFMs) or regulation 59 (for above-threshold non-EEA AIFMs) of The Alternative Investment Fund Managers Regulations 2013.

This document's 'Introduction' section provides links to further relevant information.

e) We will review AIF002 Fund Transparency Reports submitted in this way on a case by case basis. We may therefore ask AIFMs for further information to ensure this functionality has been used correctly.

11. What should an AIFM do if it wishes to submit an AIF002 NIL return?

Answer

An AIFM submitting a NIL return for the AIF002 should follow the below steps:

- a) Answer all questions between 1-5
- b) Leave blank all questions between 6-14
- c) Answer all questions between 15-21
- d) Leave blank all questions between 22-24
- e) Answer question 25-26
- f) Leave all questions after 26 blank

APPENDIX 1

GABRIEL screen shots

The following section provides screen shots of the relevant GABRIEL screens in order to help illustrate the steps described in order to complete your submissions.

Once you have logged into GABRIEL you will see the following screen listing your firm's schedules.

GABRIEL Pre-Production Test Environment Contact Us | Help | FAQs | Accessibility | Log Out

Change Firm Print

Firm and User Administration

View Schedule

My Details

View Submission History

XML Submission

XBRL Submission

View Resubmission Requests

Product Sales Data

AIFMD

Firm Schedule - Reporting Period

FRN: 980110 Firm Name: MER Test Firm 980110

Click the due date hyperlink to view and edit data items or click [+] to expand the return to show data items. [Need help?](#)

Future returns are subject to change, e.g. as a result of changes in the firm's permissions or to FCA or PRA Policy.

Return Due Date	Reporting Period Start	Reporting Period End	Status
Return due 11/08/2015	01/01/2015	30/06/2015	Overdue
Return due 01/02/2016	01/10/2015	31/12/2015	Ready to Complete
Return due 01/02/2016	01/01/2015	31/12/2015	Ready to Complete
Return due 11/02/2016	01/07/2015	31/12/2015	Ready to Complete
Return due 11/02/2016	01/01/2015	31/12/2015	Ready to Complete
Return due 21/04/2016	01/01/2015	31/12/2015	Ready to Complete
Return due 02/05/2016	01/01/2015	31/12/2015	Ready to Complete
Return due 02/05/2016	01/01/2016	31/03/2016	
Return due 01/08/2016	01/04/2016	30/06/2016	
Return due 11/08/2016	01/01/2016	30/06/2016	
Return due 31/10/2016	01/07/2016	30/09/2016	
Return due 30/01/2017	01/10/2016	31/12/2016	
Return due 30/01/2017	01/01/2016	31/12/2016	
Return due 10/02/2017	01/07/2016	31/12/2016	
Return due 10/02/2017	01/01/2016	31/12/2016	
Return due 21/04/2017	01/01/2016	31/12/2016	
Return due 01/05/2017	01/01/2016	31/12/2016	

The AIFMD screens can be accessed by clicking on the AIFMD link in the left hand side navigation

To obtain your list of PRN's click on the relevant 'Return Due dd/mm/yyyy' link where you will then see the 'fund details' link

Clicking on the relevant 'Return Due dd/mm/yyyy' will display the 'Firm Schedule - Data Items in Reporting Period' screen where you will be able to find the firm's funds using the 'fund details' link and also notify us that you have completed your submissions for this period by selecting the data item and clicking on the 'submit' button.

GABRIEL Pre-Production Test Environment Contact Us | Help | FAQs | Accessibility | Log Out

- Change Firm
- Firm and User Administration
- View Schedule**
- My Details
- View Submission History
- XML Submission
- XBRL Submission
- View Resubmission Requests
- Product Sales Data
- AIFMD

[← back](#)

Firm Schedule - Data Items in Reporting Period

FRN: 980110 Firm Name: MER Test Firm 980110

Click on the data item link to view / edit. Click [+] to view more information. You can also validate, submit, print, download PDF, XML or XBRL, by selecting the data item and clicking on the relevant action below.

To submit a PSD report, select the report and click Submit.

To upload an XBRL file, select the data item and click Upload XBRL.

Note: NGP reports cannot be submitted in GABRIEL, they are shown on your schedule as a reminder for you to send the report to us.

Reporting Period Information

Data Item Due Date: 01/02/2016
 Reporting Period Start Date: 01/01/2015
 Reporting Period End Date: 31/12/2015

Select Item	Data Item	Completion Status	Cross Validation?	Resubmission	Attachment
<input type="checkbox"/>	[+] AIF002 AIFMD - Fund Data Fund details	No data			

Select Action
Validate
Cross Validate
Upload XBRL
Submit

Print Selected Data Item(s)

You can print data item(s) or download them in read-only PDF format. To do this, select the data item(s) you wish to print/download and then press the 'Print' button below.

Print

PDF Versions

You can download offline PDF versions of the above data items and complete them offline. Select the data item(s) you wish to download and then press the 'Download PDF' button below.

Note: Once you have completed the data item(s) offline you will need to 'Upload' the data back to the online system. You cannot submit paper copies of data items to the FCA or PRA, they must be submitted online.

Download PDF

Download XML or XBRL

You can download data items from GABRIEL. For XML, you can view the data using a pre-formatted Excel template.

Complete template for published and draft data items in the Data Reference Guide (pdf) on the GABRIEL website (http://www.fca.org.uk/gabriel/)

Once you click on the AIFMD link you will see the following sections. Please note that if you do not see these then you may not have the correct user roles and responsibilities set up for you by your Principal User.

- Change Firm
- Firm and User Administration
- View Schedule
- My Details
- View Submission History
- XML Submission
- XBRL Submission
- View Resubmission Requests
- Product Sales Data
- AIFMD
- Report under AIFMD**
- Upload AIFMD XML
- AIFMD Submission History

Print

Report under Alternative Investment Fund Managers Directive

FRN: 980110 Firm Name: MER Test Firm 980110

To add and edit the current AIFMD reports click on the report type.

[AIF001 - Manager's Report](#)

[AIF002 - Fund Transparency Report](#)

To load an XML file use the 'Upload AIFMD XML' link

To add a fund or review any validation errors click on the 'AIF002 – Fund Transparency Report' link

Once you have clicked on the 'AIF002 – Fund Transparency Report' link you will be taken to the following fund summary screen. Funds will be listed here if you have entered them previously and are waiting for a correct PRN or you are working through the validation issues. Please note that even once you have corrected all other validation issues, until you have the PRN it will always show the PRN validation error.

The screenshot displays the 'AIF002 - Fund Transparency Report' interface. At the top, the header includes the 'GABRIEL' logo and navigation links for 'Contact Us', 'Help', 'FAQs', 'Accessibility', and 'Log Out'. A left-hand navigation menu lists various options such as 'Firm and User Administration', 'View Schedule', 'My Details', and 'Report under AIFMD'. The main content area features a title 'AIF002 - Fund Transparency Report' and identifies the user as 'FRN: 980041' and 'Firm Name: MER Test Firm 980041'. A yellow banner prompts the user to 'Current report summary, click one of the options below to validate and submit the current AIF002 fund transparency report/s.' Below this is an 'Add' button and a table of existing reports. The table has columns for PRN, Fund Name, Reporting Period End, Last Modified, and Report Status. Two entries are shown, both with 'Failed Validation' status. At the bottom of the table area are buttons for 'Download', 'Validate', 'Delete', and 'Submit', along with a 'Select all' button and a 'back' link.

PRN	Fund Name	Reporting Period End	Last Modified	Report Status
<input type="checkbox"/> 1223232	TEST	31/12/2014	12/01/2015	Failed Validation
<input type="checkbox"/> 589359	Large compent GB HF	31/12/2014	12/01/2015	Failed Validation

To add a fund click on the 'Add' button. To complete your submission (apart from the PRN if you do not have this) you will need to ensure you have entered all relevant data on the individual tabs displayed at the header and footer of the screen below. Use the 'Validate and save' button to work through any errors with the data. The following screen shot also displays the mandatory basic information required for the fund to be initially saved.

- Change Firm
- Firm and User Administration
- View Schedule
- My Details
- View Submission History
- XML Submission
- XBRL Submission
- View Resubmission Requests
- Product Sales Data
- AIFMD
- Report under AIFMD
- Upload AIFMD XML
- AIFMD Submission History

FRN: 980110 Firm Name: MER Test Firm 980110

AIF002 - Report on an AIF

help

Basic Information [1-26, 28-33, 39, 249] | Share Classes [27] | Investment Strategies [34-37] | Prime Broker [38] | Master / Feeder Classification [40-41] | Concentrations [42-76] | Individual Exposures [77-175] | Currency Exposures [176] | Dominant Influences [177] | Risk Profile [178-185] | Counterparty Risks [186-205] | Liquidity [206-219] | Investor Groups [220] | Financing Liquidity [221-224] | Borrowing Risk [225-231, 233, 234] | Controlled Structures [232] | Operational Risk [235-242] | Borrowing Sources [243-247] | Assumptions [248] | next

(Article 3(3)(d) and Article 24(1) of Directive 2011/61/EU)

All fund managers must complete this part of the regulatory report for each of their funds

1	Your national regulator's code for you as a fund manager	<input type="text" value="9800110"/>
2	Fund national authority code	<input type="text" value="123465"/>
3	Current domicile	<input type="text" value="UNITED STATES"/>
4	Is this in the EEA	<input type="text" value="No"/>
5	Fund name	<input type="text" value="Fund Name"/>

Fund identification codes

6	Legal Entity Identification code (LEI)	<input type="text"/>
7	International Securities Identification Number (ISIN)	<input type="text"/>
8	Commodities on Uniform Securities Identification Procedures Number (CUSIP)	<input type="text"/>
9	Stock Exchange Daily Official List code (SEDOL)	<input type="text"/>
10	Bloomberg (ticker) code	<input type="text"/>
11	Reuters Instrument Code (RIC)	<input type="text"/>
12	European Central Bank Code	<input type="text"/>

If this fund has had other national IDs in the past, then, for the latest of these:

13	Old home member state	<input type="text"/>
14	Old national regulator's code	<input type="text"/>
15	Inception date of the fund	<input type="text" value="01/01/2012"/>
16	Reporting period type	<input type="text" value="H2"/>
17	Start date	<input type="text" value="01/07/2014"/>
18	End date	<input type="text" value="31/12/2014"/>
19	Year	<input type="text" value="2014"/>
20	Type of filing	<input type="text" value="Initial"/>
249	AIF Reporting Code	<input type="text" value="1"/>
21	Filing content	<input type="text" value="24(1) reporting obligation"/>
22	Frequency change code	<input type="text"/>
23	Contents change code	<input type="text"/>
24	First quarter in which a change occurred	<input type="text"/>
25	Is this the last report you will make for this fund?	<input type="text" value="Yes"/>
26	Do you have no fund information to report? <i>(Answer 'Yes' if do not have any information to report on this fund)</i>	<input type="text" value="Yes"/>

Total value of assets under management for this fund

(calculated as set out in Article 2)

28	AUM in the base currency of the fund	<input type="text"/>
29	Total net asset value	<input type="text"/>
30	Base currency	<input type="text"/>
31	EURO FX rate	<input type="text"/>
32	Type of FX reference rate used	<input type="text"/>
33	Source of a EURO reference rate not published by the ECB	<input type="text"/>

Jurisdictions of the three main funding sources <i>(excluding units or shares of the AIF bought by investors)</i>			
	First	Second	Third
	A	B	C
39	Funding source country code	<input type="text"/>	<input type="text"/>

Basic Information [1-26, 28-33, 39, 249] | Share Classes [27] | Investment Strategies [34-37] | Prime Broker [38] | Master / Feeder Classification [40, 41] | Concentrations [42-76] | Individual Exposures [77-175] | Currency Exposures [176] | Dominant Influences [177] | Risk Profile [178-185] | Counterparty Risks [186-205] | Liquidity [206-219] | Investor Groups [220] | Financing Liquidity [221-224] | Borrowing Risk [225-231, 233, 234] | Controlled Structures [232] | Operational Risk [235-242] | Borrowing Sources [243-247] | Assumptions [248] | next

Save as draft | Validate and save