Financial Conduct Authority



Update to AIFMD Annex IV transparency reporting and GABRIEL

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Section 1.01 Purpose of the guide

This guide provides additional information around the common validation errors that firms are experiencing.

Please complete as much of the return as possible before it is validated to reduce the number of validation errors you may receive. If you cannot complete all sections of the return in one session, then please review the mandatory information listed below that is required by GABRIEL. Use the 'save' button rather than the 'validate and save' button as this prevents unnecessary validation errors from being displayed.

The following mandatory fields must be populated before GABRIEL will save your reports:

- Manager's reports mandatory information required for: 1A, 2A, 3A, 4A, 7A, 10A, 11A, 16A, 17A, 18A, 19A, 20A.
- Fund reports mandatory information required for fund reports: 1A, 2A, 3A, 4A, 5A, 15A, 16A, 17A, 18A, 19A, 249A, 21A, 25A, 26A.

Further information to be reported based on your firm's filing content obligation is outlined in the <u>XML data definition</u> <u>document</u>. Please note that these templates are designed to help create XML files so some of the information may not be relevant for your situation. If you require any help interpreting the data required, then please see <u>ESMA's reporting guidance</u>. Once you have completed your work, log out of GABRIEL as soon as possible.

Section 1.02 Common AIFMD validation errors

This section provides detail on specific issues that firms have been experiencing. Each section consists of:

- the **data** that firms would be expected to populate
- help that identifies the Common Validation Errors, and
- known issues that firms should consider

(a) Section 1- AIF001 Total AUM

Data that firms need to populate for fields 21 to 36

Values of assets under management for all AIFs managed, A calculated as set out in Article 2 21 In EURO 750127277 In base currency (if this is the same for all AIFs) 22 584211275 23 Base currency GBP 24 EURO FX rate 1.284 25 Type of FX reference rate used ECB 26 Source of EURO reference rate not published by the ECB Principal markets in which you trade on Ranking Market type Market code Aggregated value behalf of the AIFs you manage • 27 Most important market 584211275 XXX 28 Second most important market NOT • 0 Ŧ 29 Third most important market NOT 0 • 30 Fourth most important market NOT 0 • 31 Fifth most important market NOT 0 Principal instruments in which you trade on Ranking Sub-asset type Aggregated value behalf of the AIFs you manage ▼ 584211275 32 Most important instrument Energy/Crude oil 33 Second most important instrument No instrument applicable Ŧ ▼ 0 34 Third most important instrument No instrument applicable **-** 0 35 Fourth most important instrument No instrument applicable **v** 0 36 Fifth most important instrument No instrument applicable

| Fields | Common validation errors | Further information |
|---------------|---|--|
| 21A | Field must match calculation: AUM in Base Currency * Euro FX Rate must equal AUM in euros. | Please invert where appropriate. We do not require you to input 23A 'Base currency' if your base currency is already in euros. |
| 27A to 31A | Parsing issue. | Please enter the appropriate ranking value for the heading. |
| 32A to 36A | Parsing issue. | Please enter the appropriate ranking value for the heading. |
| 27D to 31D | The sum of the Aggregated Value Amounts over all five principal markets cannot be greater than the AUM Amount in Base Currency if that is entered, or the AUM in euros if is it is not. | Aggregated value of the markets aggregated at the level of the five most important markets in which it trades on behalf of the AIF it manages. Aggregated value expressed in base currency filled in without decimal places. N.B if base currency is different to euros, then 21 to 26A should be populated. If 22A has been entered, then the aggregated values should be in same base currency. |
| 32C to 36C | The sum of the Aggregated Value Amounts over all five principal instruments cannot be greater than AUM Amount in Base Currency, or the AUM in euros if is it is not. | Aggregated value of the markets aggregated at the level of the five most important markets in which it trades on behalf of the AIF it manages. Aggregated value expressed in base currency filled in without decimal places. N.B., if base currency is different to euros, then 21 to 26A should be populated If 22A has been entered then the aggregated values should be in same base currency. |

(b) Section - AIF002 Share classes

Data that firms need to populate for fields 27A to 27G

| 27 | Share class name | National competent authority code | ISIN | CUSIP | SEDOL | Bloomberg | RIC | |
|-------|------------------------------|--------------------------------------|------|-------|-------|-----------|-----|--------|
| | A | В | С | D | E | F | G | |
| 1 | | | | | | | | Delete |
| 2 | | | | | | | | Delete |
| 3 | | | | | | | | Delete |
| 4 | | | | | | | | Delete |
| 5 | | | | | | | | Delete |
| Numbe | r of share classes to add: 4 | Add | | | | | | |

| The share | classes of | this fund | (if the | fund | l has | more | than | one | class of share) | |
|-----------|------------|-----------|---------|------|-------|------|------|-----|-----------------|--|
| | | | | | | | | | | |

| Fields | Common validation errors | Further information |
|--------|--|---|
| 27A | At least one type of identification code must be entered per additional share classification | |
| | If the Share Class Flag is true, then at least one instance of an additional share classification must be present. | |
| 27B | At least one type of identification code must be entered per additional share classification | If you do not have any codes applicable, then please use the 'National competent authority code' to insert 'Not applicable' |
| 27C | At least one type of identification code must be entered per additional share classification | |
| 27D | At least one type of identification code must be entered per additional share classification | |

| 27D | At least one type of identification code must be entered per additional share classification |
|-----|---|
| 27E | At least one type of identification code must be entered per additional share classification |
| 27F | At least one type of identification code must be entered per additional share classification |
| 27G | At least one type of identification code must be entered per additional share classification |

(c) Section - AIF002 Total AUM for fund

Data that firms need to populate

Total value of assets under management for this fund (calculated as set out in Article 2)

| | | A |
|----|--|----------------------------|
| 28 | AUM in the base currency of the fund | 50100000 |
| 29 | Total net asset value | 195300000 |
| 30 | Base currency | USD - United States dollar |
| 31 | EURO FX rate | 1.3 |
| 32 | Type of FX reference rate used | ECB 🗸 |
| 33 | Source of a EURO reference rate not published by the ECB | |
| | | |

| Fields | Common validation errors | Further information |
|--------|---|--|
| 31A | Field must have a value if base currency is not 'EUR' | |
| 32A | Field must have a value if base currency is not 'EUR' | If you have entered a base currency, then these fields will also need data |
| 33A | Field must have a value if Type of FX Reference Rate used is 'Other ' | to be entered |

(d) Section - AIF002 Geographical focus

Data that firms need to populate

| Geographical focus | | % of aggregated asset value | % of NAV |
|--------------------|---|--------------------------------|----------|
| | | Α | В |
| 47 | Africa | 0.00 | 12.50 |
| 48 | Asia and Pacific (other than Middle East) | 100.00 | 12.50 |
| 49 | Europe (EEA) | 0.00 | 12.50 |
| 50 | Europe (other than EEA) | 0.00 | 12.50 |
| 51 | Middle East | 0.00 | 12.50 |
| 52 | North America | 0.00 | 12.50 |
| 53 | South America | 0.00 | 18.75 |
| 54 | Supranational / multiple region | 0.00 | 6.25 |

| Fields | Common validation errors | Further information |
|---------|--|--|
| 47A-54A | Total field must equal sum of components: The sum of AUM % for Geographical Foci must be either zero (i.e. not entered) or 100 | Rounding issues – -There is a known error in this if 2dp precision is used. In some scenarios it can be avoided by reporting exposures rounded to the nearest whole integer percentage value. This is entirely sufficient for our analysis: we do not require 2dp precision. |
| | | - However in other scenarios it will be avoided if you keep the 2dp precision. For |

| | | example if you have a third of your assets in 3 different geographical areas, and round these from 33.33% to 33% then the total will not sum to 100% as expected. N.B ESMA's V1.2 of the schemas allows negative values, however V1.1 (which is what GABRIEL has been designed to) does not. |
|---------|--|--|
| 47B-54B | Total field must equal sum of components: The sum of NAV % for Geographical Foci must be 100 | Rounding Issues – There is a known error in this if 2dp precision is used. In some scenarios it can be avoided by reporting exposures rounded to the nearest whole integer percentage value. This is entirely sufficient for our analysis: we do not require 2dp precision. However in other scenarios it will be avoided if you keep the 2dp precision. For example if you have a third of your assets in 3 different geographical areas, and round these from 33.33% to 33% then the total will not sum to 100% as expected. N.B ESMA's V1.2 of the schemas allows negative values, however V1.1 (which is what GABRIEL has been designed to) does not. Please note page 21 of the FCA's <u>Q&A for Reporting Transparency information to the FCA.</u> |

(e) Section - AIF002 Portfolio concentration

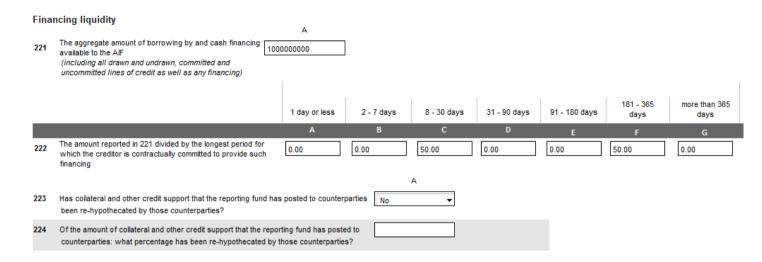
Data that firms need to populate

| | | | Ма | rket | | | | | Counterparty | (if there is one) |
|---|---------|------------|----------------|-------------|---------------------|-----------------------|------------------|-----------------------|---|---|
| Most important portfolio concentrations | Ranking | Asset type | Market type | Market code | Aggregated value | Aggregated value % | Position type | Counterparty's BIC | Counterparty's LEI | Counterparty's name |
| | A | В | с | | E | | | | | L |
| 65 | 1st 1 | SEC_CSH - | MIC 🔻 | XYY1 | 19989900 | 3.99 | long 🔻 | BIC00001062 | LE1000000000000000000000 | Portfolio concentration counterparty 65 |
| 66 | 2nd 2 | DER_CTY - | MIC 🔻 | XYY1 | 19488900 | 3.89 | long 🔻 | BIC00001062 | LE1000000000000000000000000000000000000 | Portfolio concentration counterparty 66 |
| 67 | 3rd 3 | SEC_SSP - | MIC 🔻 | XYY1 | 18987900 | 3.79 | long 🔻 | BIC00001062 | LE100000000000820 | Portfolio concentration counterparty 67 |
| 68 | 4th 4 | SEC_LON - | MIC 🔻 | XYY1 | 18488900 | 3.69 | long 🔻 | BIC00001062 | LE1000000000000830 | Portfolio concentration counterparty 68 |
| 69 | 5th 5 | PHY_TIM - | MIC 🔻 | XYY1 | 17985900 | 3.59 | long 🔻 | BIC00001062 | LE100000000000840 | Portfolio concentration counterparty 69 |

| Fields | Common Validation Errors | Further Information | |
|--------|---|---|--|
| 65A- | If portfolio concentration asset type (65-69B) is 'NTA_NTA' then no other details should be entered for 65-69 C to J | NA | |
| 69J | 65-69 C to G are mandatory unless asset type (65- 69B) is 'NTA_NTA' | | |
| | Aggregated value percentage must be greater than | Please be aware of the rounding issue previously described in the | |
| 65- | zero. | Geographical Focus section. | |
| 69F | The ratio between Portfolio concentration Aggregated Value Amount and Percentage must be consistent for all exposure entries. | Please see the example ratio calculation section described below to help aid with this input. | |

| | The sum of Portfolio concentration Aggregated Value Percentage must be less than or equal to 100. | Please be aware of the rounding issue previously described in the Geographical Focus section. |
|------------|---|---|
| | Aggregated value percentage must be greater than zero. | NA |
| | The Portfolio concentration Ranking must reflect the order of the Aggregated Value Amount (and vice-versa). | Please ensure you enter the appropriate ranking value for the heading |
| 65- 69E | The ratio between Portfolio concentration Aggregated Value Amount and Percentage must be consistent for all exposure entries. | Please see the example ratio calculation section described below to help aid with this input. |
| | The sum of all Aggregated Value Amounts of the Portfolio concentrations must be less than or equal to the AIFs total AUM Amount In Base Currency. | This is being validated against 28A 'AUM in the base currency of the fund' |
| 65- 69D | If Type of market (65-69C) is 'MIC', 65-69D must be populated with an ISO 10383 standard format code for an MIC exchange | NA |
| 65- 69A | At least one portfolio concentration must be entered | NA |

(f) Section - AIF002 Financing & Borrowing



Borrowing and Exposure Risk

Value of borrowings of cash or securities represented by:

| 225 | Unsecured cash borrowing | 1000000 | |
|-----|--|---------|--|
| 226 | Collateralised/secured cash borrowing - via Prime Broker | 1000000 | |
| 227 | Collateralised/secured cash borrowing - via (reverse) repo | 1000000 | |
| 228 | Collateralised/secured cash borrowing - via Other | 1000000 | |

А

Value of borrowing embedded in financial instruments

| 229 | Exchange-traded Derivatives: Gross exposure less margin posted | 100000000 |
|-----|---|-----------|
| 230 | OTC Derivatives: Gross exposure less margin posted | 100000000 |
| 231 | Value of securities borrowed for short position | 10000000 |

| Fields | Common Validation Errors | Further Information |
|--------|---|--|
| 221A | Total field must equal sum of components: The aggregate amount of borrowing available must be greater than or equal to the sum of borrowings of cash or securities borrowed for short positions | 221A >= (225A + 226A+ 227A + 228A + 231A) |
| 222 | Fields must be equal: The sum of all period bucket amounts for finance liquidity must equal 100% | i.e. 222A + 222B + 222C + 222D + 222E + 222F + 222G = 100% |
| 223A | If re-hypothecation is declared then re-hypothecation percentage must be greater than zero | NA |
| | If re-hypothecation is not declared then re-hypothecation percentage must be zero | NA |
| | If re-hypothecation is declared then re-hypothecation percentage must be greater than zero | NA |
| 224A | If re-hypothecation is not declared then re-hypothecation percentage must be zero | NA |

(g) Section - AIF002 Operational risk

| Oper | ational and Other Risk Aspects | | | | | | | | | | | | |
|------|--|---------|----------|-------|-------|-----|------|------|--------|-----------|---------|----------|----------|
| 235 | Total number of open positions | 78 | | | | | | | | | | | |
| | | January | February | March | April | Мау | June | July | August | September | October | November | December |
| | | A | в | с | D | E | F | 0 | н | I. | J | к | L |
| 238 | Gross Investment returns or IRR over the reporting period (in %, gross of management and performance fees) | | | | | | | | | | 7.00 | 7.00 | 7.00 |
| 237 | Net investment returns or IRR over the reporting period (in %, gross of management and performance fees) | | | | | | | | | | 2.37 | 2.37 | 2.37 |
| 238 | Change in Net Asset Value over the reporting period (in %, including the impact of subscriptions and redemptions) | | | | | | | | | | 2.38 | 2.38 | 2.38 |
| | | | | | | | | | | | | | |
| 239 | Subscriptions over the reporting period | | | | | | | | | | 8000 | 8000 | 7000 |
| 240 | Redemptions over the reporting period | | | | | | | | | | 240000 | 240000 | 240000 |

| Fields | Common Validation Errors | Further Information |
|--------|---|---|
| 236A-C | IF Reporting Period Type is one of 'H1', 'Q1', or 'Y1' THEN this month must have a non-null value (value can be zero). | Please insert zero's where no relevant data to input for the period. Please note that this section is driven by the filing content (21A) and reporting period type (16A) that you have entered. Articles 24(1) and 3.3(d) - AIF - Item 5 - The codes for the AIF content types are: for "24(1) reporting obligation" for "24(1) + 24(2) reporting obligation" for "3(3) (d) reporting obligation" |
| | | 4. for "24(1) + 24(2) + 24(4) reporting obligation" 5. for "24(1) + 24(4) reporting obligation" |
| 236D-F | IF Reporting Period Type is one of 'H1', 'Q2', or 'Y1' THEN this month must have a non-null value (value can be zero). | Please insert zero's where no relevant data to input for the period. Please note that this section is driven by the filing content (21A) and reporting period type (16A) that you have entered. Articles 24(1) and 3.3(d) - AIF - Item 5 - The codes for the AIF content types are: for "24(1) reporting obligation" for "24(1) + 24(2) reporting obligation" for "3(3) (d) reporting obligation" for "24(1) + 24(2) + 24(4) reporting obligation" for "24(1) + 24(4) reporting obligation" |

| | | Please insert zero's where no relevant data to input for the period. Please note that this section is driven by the filing content (21A) and reporting period type (16A) that you have entered. |
|--------|--|---|
| 236G-I | IF Reporting Period Type is one of 'H2', 'Q3', or 'Y1' THEN this | Articles 24(1) and 3.3(d) - AIF - Item 5 - The codes for the AIF content types are: |
| 2300-1 | month must have a non-null | 1. for "24(1) reporting obligation" |
| | value (value can be zero). | 2. for "24(1) + 24(2) reporting obligation" |
| | | 3. for "3(3) (d) reporting obligation" |
| | | 4. for "24(1) + 24(2) + 24(4) reporting obligation" |
| | | 5. for "24(1) + 24(4) reporting obligation" |

| | | Please insert zero's where no relevant data to input for the period. Please note that this section is driven by the filing content (21A) and reporting period type (16A) that you have entered. |
|--------|---|---|
| 236J-L | IF Reporting Period Type is one of 'H2', 'Q4', or 'Y1' THEN this | Articles 24(1) and 3.3(d) - AIF - Item 5 - The codes for the AIF content types are: |
| | month must have a non-null | 1. for "24(1) reporting obligation" |
| | value (value can be zero). | 2. for "24(1) + 24(2) reporting obligation" |
| | | 3. for "3(3) (d) reporting obligation" |
| | | 4. for "24(1) + 24(2) + 24(4) reporting obligation" |
| | | 5. for "24(1) + 24(4) reporting obligation" |

(h) Section - AIF002 Principal Exposures

| | | | | | | | | Counterparty (| (If there Is one) |
|--|---------|-------------------------------------|--------------------|------------------|-----------------------|---------------|-----------------------|-----------------------|------------------------------------|
| Principal exposures of the AIF at the reporting date | Ranking | Macro-asset type | Sub- asset type | Aggregated value | Aggregated value % | Position type | Counterparty's BIC | Counterparty's LEI | Counterparty's name |
| | A | В | с | D | E | F | G | н | I. |
| 55 | 1st 1 | Securities 💌 | SEC CSH COMP - | 19989900 | 3.99 | long 🔻 | BIC00001055 | LEI000000000005501 | Principal exposure counterparty 55 |
| 56 | 2nd 2 | Derivatives 🗸 | DER_CTY_ECOL - | 18987900 | 3.79 | long 👻 | BIC00001056 | LEI000000000005601 | Principal exposure counterparty 56 |
| 57 | 3rd 3 | Securities 🗸 | SEC SSP AMBS | 17985900 | 3.59 | long 🔻 | BIC00001057 | LEI000000000005701 | Principal exposure counterparty 57 |
| 58 | 4th 4 | Securities 🔻 | SEC LON OTHL | 16983900 | 3.39 | long 🔻 | BIC00001058 | LE1000000000005801 | Principal exposure counterparty 58 |
| 59 | 5th 5 | Collective investment undertaking - | CIU_OAM_AETF - | 15981900 | 3.19 | long 👻 | BIC00001059 | LEI000000000005901 | Principal exposure counterparty 59 |
| 60 | 6th 6 | Securities 🔻 | SEC CSH COMP - | 14979900 | 2.99 | long 🔻 | | | |
| 61 | 7th 7 | Derivatives 🔻 | DER_CTY_ECOL - | 13977900 | 2.79 | long 🔻 | | | |
| 62 | 8th 8 | Securities - | SEC_SSP_AMBS | 12975900 | 2.59 | long 👻 | | | |
| 63 | 9th 9 | Securities 💌 | SEC LON OTHL | 11973900 | 2.39 | long 🔻 | | | |
| 64 | 10th 10 | Collective investment undertaking | CIU_OAM_AETF - | 10971900 | 2.19 | long 🔻 | | | |

| Fields | Common Validation Errors | Further Information |
|---------|---|---------------------|
| 55A-64I | Columns 55-64D to F are mandatory when the asset macro type (55-64B) is anything other than 'No assets to report' (or 'NTA' in the XML file). | NA |
| | If principal exposure asset macro type is 'NTA' (55-64B), then55-64C to I must be not be entered. | NA |

| | The ratio between Principal Exposure Aggregated Value Amount and Percentage must be consistent for all exposure entries. | Very small aggregated value percentages (less than 0.5% of AUM) may cause rejection of otherwise valid data. This is because the rounding error introduced by the mandated 2dp precision becomes significant when back-calculating the denominator for validation purposes for very small percentages. This issue can be avoided by omitting any lines for aggregated values this small because 0.5% of AUM can neither be described as 'Principal' nor 'Most important' replacing them with 'NTA' or 'NTA_NTA' blank entries as appropriate - this is entirely legitimate and within the spirit of the question. Please also see the below calculation for an example of how to calculate this. |
|--------|---|--|
| | The sum of Principal Exposure Aggregated Value Percentage must be less than or equal to 100. | Please be aware of the rounding issue previously described in the Geographical Focus section. |
| | Aggregated value percentage must be greater than zero. | NA |
| | The Principal Exposure Ranking must reflect the order of the Aggregated Value Amount (and vice-versa). | Please ensure you enter the appropriate ranking value for the heading |
| 55-64D | The ratio between Principal Exposure Aggregated Value Amount and Percentage must be consistent for all exposure entries. | Very small aggregated value percentages (less than 0.5% of AUM) may cause rejection of otherwise valid data. This is because the rounding error introduced by the mandated 2dp precision becomes significant when back-calculating the denominator for validation purposes for very small percentages. This issue can be avoided by omitting any lines for aggregated values this small because 0.5% of AUM can neither be described as 'Principal' nor 'Most important' replacing them with 'NTA' or 'NTA_NTA' blank entries as appropriate - this is entirely legitimate and within the spirit of |

| | the question. Please also see the below calculation for an example of how to calculate this. |
|--|--|
| The sum of all Aggregated Value Amounts of the Principal Exposures must be less than or equal to the AIFs total AUM Amount In Base Currency. | i.e. 55 to 64 D <= 28A |

Example ratio calculation

The ratio between 55-64 D and E must be consistent for all exposure entries that pass test T145.

All the percentage rates given in 55-64 should at least be referring to the same total. The total value implied by each line can be calculated as [55-64] D / ([55-64] E / 100). The rounding to 2 dp precision in each cases could produce an error of +-0.05 * each implied value. We calculate the mean of these implied totals and declare an error if there are any outliers outside a reasonable range about this mean. Rounding could give an value up to +-1% different from the mean for any single line. This is tolerable. Anything outside this triggers this error.

| 55 to 64 D | 55 to 64 E | X | Y Variation from the mean |
|------------------|--------------------|-------------|----------------------------------|
| Aggregated value | Aggregated value % | D /(E/100) | = (X- 'Mean of X') / 'Mean of X' |
| 19,989,900 | 3.99 | 50100000 | -0.04% |
| 18,987,900 | 3.79 | 50100000 | -0.04% |
| 17,985,900 | 3.59 | 50100000 | -0.04% |
| 16,983,900 | 3.39 | 50100000 | -0.04% |
| 15,981,900 | 3.19 | 50100000 | -0.04% |
| 14,979,900 | 2.99 | 50100000 | -0.04% |
| 13,977,900 | 2.78 | 502802158 | 0.32% |
| 12,975,900 | 2.59 | 50100000 | -0.04% |
| 11,973,900 | 2.39 | 50100000 | -0.04% |
| 10,971,900 | 2.19 | 50100000 | -0.04% |
| 154,809,000 | 30.89 | | |

Mean of X = 501180216

(i) Section - AIF002 Liquidity Profiles

Liquidity Profiles

| | | 1 day or less | 2 - 7 days | 8 - 30 days | 31 - 90 days | 91 - 180 days | 181 - 365 | more than 365 days |
|------|---|--------------------|-----------------|------------------|-------------------|--------------------|-------------------|-----------------------|
| | | A | B | C | D | E | days F | G |
| 206 | Percentage of portfolio capable of being liquidated within | 0.00 | 0.00 | 0.00 | 0.00 | 77.00 | 23.00 | 0.00 |
| | | | | | | | | |
| | | А | | | | | | |
| 207 | Value of unencumbered cash 10 | 00000 |] | | | | | |
| Data | ntial investor redemption | | | | | | | |
| Pote | ntial investor redemption | | | | | | | |
| | | | | | | | | |
| | | 1 day or less | 2 - 7 days | 8 - 30 days | 31 - 90 days | 91 - 180 days | 181 - 365 days | more than 365 days |
| | | 1 day or less A | 2 - 7 days B | 8 - 30 days C | 31 - 90 days D | 91 - 180 days E | | |
| 208 | Percentage of investor equity (as % of AIF's NAV) that can be redeemed within | - | - | - | | | days | days |
| 208 | | A | В | c | D | E | days F | days G |
| 208 | | A | В | c | D | E | days F | days G |
| 208 | redeemed within | A 0.00 | В | c | D | E | days F | days G |
| | Does the AIF provide investors with withdrawal or | A 0.00 | В | c | D | E | days F | days G |

| 211 | nat is the notice period required for redemptions in days? 90 | |
|-----|--|--|
| | eport asset weighted notice period if multiple classes or ares or units) | |
| 212 | nat is the investor 'lock-up' period in days? aport asset weighted notice period if multiple classes or ares or units) | |

Special arrangements and preferential treatment

| _ | | Side pockets (in %) | Gates (in %) | Suspension of dealing (in %) | Other arrangements (in %) | There are any other arrangements (210D), please pro description of the arrangement(s) | vide a |
|-----|---|---------------------------|---|------------------------------|---------------------------------|--|--------|
| | | Α | В | С | D | E | |
| 213 | As at the reporting date, what percentage of the AIF's NAV is subject to the following arrangements? | F | | | | | |
| 214 | Total percentage of net asset value of the Al currently subject to special arrangements ari illiquid nature under Article 23(4) of the AIFM those in 213 | ising from their | Α | | | | |
| 215 | Are there any investors who obtain preferer or the right to preferential treatment and there subject to disclosure in accordance with Art the AIFMD? | efore are Yes | • | | | | |
| | answer to 215 is 'yes', please indicate (by a 'ye | | ferential treatments: | | | | |
| 216 | Concerning different disclosure/reporting to i | investors No | • | | | | |
| 217 | Concerning different investor liquidity terms | No | • | | | | |
| | | ncerning different fee to | | No | • | | |
| | | Financing liqu | iidity | | А | | |
| | | available t (including | gate amount of borrowin o the AIF all drawn and undrawn, ted lines of credit as we | committed and | g 100000000 | | |

| Fields | Common Validation Errors | Further Information | | |
|--------|--|--|--|--|
| 221A | Reporting the Financing of Liquidity if there is zero aggregate borrowing | If aggregate borrowing (field 221A) is reported as zero you should, if possible, omit the entirety of element 'Financing Liquidity Profile' from the XML (or leave it blank if using the web form). If field 221A is populated with the figure zero this will trigger the validation of the rates in the time period breakdown (row 222) which must then sum to 100%. If system constraints do not allow this element to be omitted then you should report 100% as a DaysOto1 rate. | | |
| | | | | |
| 210A | If no redemptions are allowed then there should be no notice period, lock-up period, or frequency | | | |
| | | If 209A is 'no' then this field should not be | | |
| 211A | If no redemptions are allowed then there should be no notice period, lock-up period, or frequency | entered. | | |
| 212A | If no redemptions are allowed then there should be no notice period, lock-up period, or frequency | | | |
| 216A | If it is declared that any preferential treatment exists, then at least one sub-type of preferential treatment must be selected - and vice-versa | | | |
| 217A | If it is declared that any preferential treatment exists, then at least one sub-type of preferential treatment must be selected - and vice-versa | If 215A = 'Yes' then this field is mandatory. | | |
| 218A | If it is declared that any preferential treatment exists, then at least one sub-type of preferential treatment must be selected - and vice-versa | | | |
| 219A | If it is declared that any preferential treatment exists, then at least one sub-type of preferential treatment must be selected - and vice-versa | | | |