



Illustrative annual report for investment funds in accordance with Luxembourg GAAP

September 2020

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Introduction

The quality of financial information disclosed to third parties has become crucial. Indeed, the varied stakeholders, operating in today's capital markets (e.g. investors, regulators, tax authorities and creditors), increasingly rely on the quality and transparency of the financial data provided by the entities concerned.

With almost 3,693 and 14,720 sub-funds, and more than EUR 4.4 trillion in net assets under management as at end of April 2020 (source: CSSF), Luxembourg continues to play a significant role in the global capital markets and we believe it is important to maintain a consistently high quality of annual report presentation which is both informative and relevant to investors.

In this brochure, we provide an updated illustrative annual report for UCITS and Alternative Investment Funds prepared in accordance with generally accepted accounting principles in Luxembourg (i.e. the "Luxembourg GAAP") which include the updates required by the current Laws as at 17 December 2010 (UCITS), 13 February 2007 (SIF), 12 July 2013 (AIFMD) and 23 July 2016 (RAIF) as amended, CSSF circulars on, among others, risk management, VaR disclosure requirements, ESMA guidelines and Q&A, UCITS V and Securities Financing Transactions Regulation. You will also find disclosure requirements for selected countries where funds may be publicly distributed.

This is a realistic and comprehensive annual report for UCITS and Alternative Investment Funds which is based on the most commonly observed operations of Luxembourg funds. The example disclosures comprise our view of best practice and should not be considered as the only acceptable form of presentation. The form and content of each reporting entity's annual report are the responsibility of the entity's governing body.

We trust that you will find this brochure helpful.



Mike Delano
Assurance Asset and Wealth Management Leader

Provisions relating to the content and presentation of the annual report

This guide is based on Luxembourg Generally Accepted Accounting Principles, regulatory texts and best practices as of the date of publication of this brochure. These are evolving frequently and as such, we recommend to monitor carefully changes in these areas.

Unless otherwise stated in specific laws and/or CSSF circulars, investment funds fall under the disclosure requirements defined in the Law and the Grand Ducal Regulation of 18 December 2015. The 18 December 2015 Law on annual accounts and consolidated annual accounts amends the Law of 10 August 1915 on commercial companies and the Law of 19 December 2002 on the register of commerce and companies and the accounting and annual accounts of undertakings.

The disclosure requirements specific to the annual reports of Luxembourg Part I (UCITS) and Part II investment funds are defined by part I and part II of the Law of 17 December 2010, as amended by the Law of 10 May 2016 and relevant CSSF circulars applicable to UCIs investment funds.

The disclosure requirements specific to the annual reports of Luxembourg Specialised Investment Funds (SIFs) are defined by the Law of 13 February 2007 (SIF).

The disclosure requirements specific to the annual reports of Luxembourg Reserved Alternative Investment Funds (RAIFs) are defined by the Law of 23 July 2016.

All Part II funds, RAIFs and SIFs (that qualify as AIFs) are also subject to the disclosure requirements of the Law of 12 July 2013 (AIFMD).

Presentation

Art 26 (2) and Art 37 (1) of the Law of 19 December 2002 as amended

The annual accounts shall be prepared in accordance with the provisions of the law applicable to commercial companies, except when otherwise stated in the Law of 17 December 2010 (UCITS), 13 February 2007 (SIF)/ 12 July 2013 (AIFs) /23 July 2016 (RAIF), as amended or in CSSF circulars applicable to investment funds.

Where an asset or liability relates to more than one layout item, its relationship to other items must be disclosed either under the item where it appears or in the notes to the accounts, if such disclosure is essential to the comprehension of the annual accounts.

True and fair view

Art 26 (3), (4), (6) of the Law of 19 December 2002 as amended

The annual accounts shall give a true and fair view of the investment fund assets, liabilities, financial position and results.

Where the application of the provisions of the law would not provide sufficient information to give a true and fair view within the meaning of Art 26 (3) of the 19 December 2002 law as amended, additional information must be given.

Where a provision of the law requires a quantitative or qualitative assessment, it must be performed by the management of the investment fund in accordance with the true and fair view principle.

*Art 51 (1) of
the Law of 19
December 2002
as amended*

Unless there is an exceptional derogation disclosed and explained in the notes to the accounts, the accounting policies shown in the annual accounts shall be made in accordance with the following general principles derived from the Luxembourg Company Law:

- The investment fund is presumed to be carrying on its business as a going concern (i.e. going concern principle).
- The valuation methods may not be modified from one financial year to another (i.e. permanence of methods principle).
- Accounts must be taken of income and charges relating to the financial year in respect of which the accounts are drawn up irrespective of the date of receipt or payment of such income or charges (i.e. cut-off principle).
- The components of asset and liability items must be valued separately (i.e. principle of segregated valuation of asset and liability items).
- The balance sheet at the beginning of each financial year must correspond to the closing balance sheet for the preceding financial year (i.e. principle of intangibility of the opening balances).

Required content of the annual report

Part I (UCITS) and Part II funds

*Art 151 (3) of
the Law of 17
December 2010,
as amended*

The annual report must include a balance sheet or a statement of assets and liabilities, a detailed income and expenditure account for the financial year, a report on the activities of the past financial year and the other information provided for in Schema B of Annex I to the Law, as well as any significant information which will enable investors to make an informed judgment on the development of the activities and the results of the UCI.

In addition to the information to be included in the annual report laid out in the Schema B of the Annex I of the Law, the content of the annual report of a Part II fund is governed by the rules laid down in Art 20 of the amended Law of 12 July 2013 relating to Alternative Investment Fund Managers.

SIFs and RAIFs

*Art 52 of the
Law of 13
February 2007, as
amended*

The annual report must include a balance sheet or a statement of assets and liabilities, an income and expenditure account for the financial year, a report on the activities of the past financial year as well as any significant information enabling investors to make an informed judgment on the development of the activities and of the results of the SIF/RAIF.

*Art 38 of the Law
of 23 July 2016*

In addition to the information to be included in the annual report laid out in the Annex of the SIF and RAIF law, the content of the annual report of the SIF (that qualifies as an AIF) and the RAIF is governed by the rules laid down in Art 20 of the amended Law of 12 July 2013 relating to Alternative Investment Fund Managers.

SIFs/RAIFs and their subsidiaries are exempt from the obligation of consolidating the companies owned for investment purposes.

Information to be included in the semi-annual report

Part I (UCITS) and Part II Funds

*Art 151 (4) of
the Law of 17
December 2010,
as amended*

The semi-annual report must include at least the information provided for in Chapter I to IV of Schema B of Annex I to the Law.

Where a UCI has paid or proposes to pay an interim dividend, the figures shall indicate the results after tax for the half-year concerned and the interim dividend paid or proposed.

SIFs and RAIF

The SIF and the RAIF Laws do not require the preparation of a semi-annual report.

Specific rules applicable to multiple sub-funds (umbrella structure)

Part I (UCITS) and Part II Funds

*Circular IML
91/75*

Multiple sub-funds UCI must include in their financial reports' separate information on each of their sub-funds, as well as combined information on all of their sub-funds. This information is provided for by Art 151 (3), (4), (5) of the amended Law of 17 December 2010, as well as in Schema B annexed to the Law, provided that headings II., III., IV., VI. and VII. of that Schema are not to be considered for the establishment of combined information.

The separate financial reports, which must be established for each of the sub-funds, must be expressed in their respective reference currency. In order to create the combined situation of the UCI, these financial reports must be aggregated after having been converted in the denomination of the share capital, where the UCI has been formed as an investment company, or in the currency determined for that purpose by the management company, where the UCI has been formed as a FCP.

In addition to the preparation of the financial statements covering the UCI and each of its sub-funds, following the aforementioned rules, multiple sub-funds UCI may provide for the publication of separate financial reports for each of their sub-funds. Where this facility is used, the conditions provided for the publication of separate prospectuses are similarly applicable to this case.

Where a separate annual report is established for each sub-fund of a multiple sub-funds UCI, the audit report provided for by Art 154 (1) of the amended Law of 17 December 2010 must also be included in the relevant report unless the auditor delivers separate reports for each sub-fund. If such separate auditor's reports are produced, they may be published in the separate annual reports of the relevant sub-funds in lieu of the report covering all the sub-funds that make up the UCI.

RAIFs with multiple sub-funds

*Art 49 (1) and 49 (9)
of the Law of
23 July 2016*

The RAIF Law does not foresee the inclusion of separate financial information for each sub-fund in a RAIF's annual report.

As such, the annual report should be prepared solely at the combined level. Relevant information at the sub-fund level must, however, be disclosed in the notes to the financial statements.

In addition to the preparation of the financial statements covering the RAIF (combined level only), multiple sub-funds RAIF may, on a voluntary basis, provide for the preparation of separate financial reports for each of their sub-funds.

Specific disclosures for cross sub-fund investments (UCITS only)

*Art 181 (8) of
the Law of 17
December 2010, as
amended*

Cross sub-fund investments in UCITS should be indicated or eliminated from the combined statement of net assets and combined statement of operations and changes in net assets effects in the annual report. In absence of any specific Luxembourg GAAP requirements and/or communication from the regulator at the date of publication of this brochure, two options could be considered for such disclosure:

- Full elimination of the cross sub-fund investments in the combined statement of net assets and in the combined statement of operations and changes in net assets effects, detailing in a note to the financial statements how the combined statements have been calculated;

- When such elimination cannot be done without undue costs, indicate in a note to the financial statements that the cross sub-fund investments were not eliminated from the combined statements and indicate the related cross sub-fund investments amounts.

An example of such disclosure is included in note 2.3 of the illustrative annual report for UCITS.

Specific disclosures applicable to a sub-fund liquidation and a fund merger

IRE-TN2019-19

In case of sub-fund liquidation, the date of closing of the sub-fund should be mentioned in the annual report/semi-annual report. The statements of changes in net assets/statement of operations of the sub-fund for the period up to its closure should also be included in the audited financial statements.

Following a merger, the best practice disclosure in the annual report/semi-annual report of the absorbed and absorbing investment fund is to include a note to the financial statements describing the merger including the exchange ratio applied.

Valuation principles

Part I (UCITS) and Part II Funds

*Art 9 (3) of
the Law of 17
December 2010,
as amended*

Unless otherwise provided for in the management regulations of the fund, the valuation of the assets of the UCI shall be based, in the case of securities admitted to official listing on a stock exchange, on the last known stock exchange quotation, unless such quotation is not representative. For securities not admitted on such a stock exchange and for securities which are admitted on such a stock exchange but for which the latest quotation is not representative, the valuation shall be based on the probable realisation value, estimated with care and in good faith.

In addition, the valuation of the assets of Part II must be performed in accordance with the rules laid out in Art 17 of the Law of 12 July 2013.

SIF and RAIF

*Art 11 and 26 of
the Law of 23
July 2016*

Unless otherwise provided for in the fund's governing documents, the valuation of the assets shall be based on their fair value. This value must be determined in accordance with the rules set forth in the fund's governing documents.

*Art 9, 28 and 40 (1)
of the Law of 13
February 2007,
as amended*

In addition, the valuation of the assets of SIFs (that are AIFs managed by an authorised AIFM) and RAIFs must be performed in accordance with the rules laid out in Art 17 of the Law of 12 July 2013.

Transaction costs

Part I (UCITS) and Part II Funds

The Schema B of the annex I of the Law of 17 December 2010 as amended by the Law of 12 July 2013 indicates that the statement of the developments concerning the assets of the Part I (UCITS) and Part II during the reference period should include transaction costs, which are costs incurred by a UCI in connection with transactions on its portfolio.

As such, the Part I (UCITS) and Part II funds should disclose transaction costs in the statement of operations as a separate line item under the caption “transaction costs”. As an alternative option, it is also acceptable to disclose these transaction costs in the Notes to the financial statements in which case they may be disclosed as a single figure per sub-fund (in the currency of the sub-fund). An example of such note has been included in the illustrative annual report for Part I (UCITS) and Part II funds.

SIF and RAIF

The SIF and RAIF Laws do not include any requirements in respect to disclosure of transaction costs.

Presentation of realised and unrealised gains and losses on investments on a gross basis

Part II funds, RAIFs and SIFs

Funds that qualify as AIFs, must, in accordance with Law of 12 July 2013 present realised and unrealised gains and losses on investment on a gross basis. This information can be presented in the statement of operations and changes in net assets but is most often disclosed in a separate note to the financial statements.

Part I funds

Realised and unrealised gains and losses are presented net in the statement of operations and changes in net assets.

Translation of annual report

When the financial statements are translated in several languages, the following wording must be added in the translated annual report under the audit report.

Only the (English, French, etc.) version of the present Annual Report has been audited by the “Réviseur d’entreprises agréé”. Consequently, the audit report only refers to the (English, French, etc.) version of the report; other versions result from a conscientious translation made under the responsibility of the Board of Directors. In case of differences between the [English, French, etc.] version and the translation, the (English, French, etc.) version shall be the authentic text.

Abridged annual report

Abridged annual report can be prepared in addition to the full version of the annual report. Abridged annual reports must include specific disclosures such as:

- Specific audit opinion for abridged annual report;
- An additional note to the abridged annual report: “This is an abridged version of the audited annual report.

The full version of the audited annual report is available on demand at the registered office of the Fund”.

Communication and Publication

Part I (UCITS) and Part II Funds

*Art 150 (1) and (2)
of the Law of 17
December 2010,
as amended*

The investment company and the management company, for each of the funds it manages, must publish an annual report for each financial year and a semi-annual report covering the first six months of the financial year.

The annual and semi-annual reports of Part I funds (UCITS) must be published within the following time limits, with effect from the end of the period to which they relate:

Four months in case of the annual report,
Two months in case of the semi-annual report.

The annual report and semi-annual reports of Part II funds must be published within the following time limits, with effect from the end of the period to which they relate:

Six months in case of the annual report,
Three months in case of the semi-annual report.

SIF and RAIF

*Art 52 (2) of the Law
of 13 February 2007
Art 38 (2) of the Law
of 23 July 2016*

The annual report of SIFs and RAIFs must be made available to investors within six months from the end of the year/period to which it relates.

As from 1 February 2019, the documents as listed in the annex of Circular 19/708 can only be transmitted to the CSSF by electronic means.

Documents are to be sent in PDF-txt format and must not prevent reading access, printing, selecting (copy/paste) and searching for specific words.

Risk Management information (applicable to UCITS ONLY)

*ESMA Guidelines
10.788*

CSSF Circular 11/512 and box 25 of ESMA Guidelines 10-788 provides that UCITS shall communicate the following information in the annual report:

- The method used to calculate global exposure, making a distinction between the commitment approach, the relative VaR or the absolute VaR approach;
- Information on the reference portfolio for UCITS using the relative VaR approach;
- Information on the VaR limit including (at least) the lowest, the highest and the average utilisation during the last financial year, as well as on the type of model (e.g. historical simulation, Monte-Carlo simulation) and on parameters (e.g. confidence interval, holding period, observation period);
- The leverage level reached during the last financial year (for UCITS using the VaR for the global exposure determination).

There is no requirement to include such information in the notes to the financial statements. Market practice has shown that this information is generally included in the Management Report or in a supplemental unaudited schedule or annex included in the annual report. An example of such disclosure is included in the “Management report” section of the illustrative annual report for UCITS.

ESMA guidelines on ETFs and other UCITS issues (ESMA/2014/937) (applicable to UCITS only)

*CSSF
Circular 13/559 -
ESMA Guidelines
2014/937
§ 43(e) and 48*

On 18 December 2012, ESMA published its guidelines on ETFs and other UCITS issues. These guidelines define, amongst others, new reporting requirements in relation to index tracking funds, efficient portfolio management techniques and financial derivative instruments. These guidelines entered into force on 18 February 2013, which is also the date on which the CSSF Circular 13/559 implementing these guidelines have been issued.

1) Index tracking UCITS

*ESMA Guidelines
2014/937
§11*

The annual and half-yearly reports of an index-tracking UCITS should:

- a) State the size of the tracking error at the end of the period under review;
- b) Provide an explanation, in the annual report, of any divergence between the anticipated and realised tracking error for the relevant period; and
- c) Disclose and explain in the annual report the annual tracking difference between the performance of the UCITS and the performance of the index tracked.

There is no requirement to include such information in the footnotes of the financial statements. Market practice has shown that this information is generally included in the Management Report or in supplemental unaudited schedule or annex included in the annual report. An example of such disclosure is included in the “Management report” section of the illustrative annual report for UCITS.

2) Efficient Portfolio Management (“EPM”) techniques

*ESMA Guidelines
2014/937
§35*

The annual report should contain certain details regarding the efficient portfolio management techniques (e.g. repurchase agreements/reverse repurchase agreements/securities lending) used by a UCITS:

- a) the exposure obtained through efficient portfolio management techniques;
- b) the identity of the counterparty(ies) to these efficient portfolio management techniques;
- c) the type and amount of collateral received by the UCITS to reduce counterparty exposure; and
- d) the revenues arising from efficient portfolio management techniques for the entire reporting period together with the direct and indirect operational costs and fees incurred.

An example of such disclosure requirements for securities lending (most frequent technique of EPM in UCITS) is included in the Note 18 of the “Notes to the financial statement” section of the illustrative annual report for UCITS. For other techniques, this note may need to be adapted based on the circumstances. Refer to Appendix 1 for Securities Financing Transactions Regulation disclosures in annual and semi-annual reports.

3) Financial derivative instruments

*ESMA Guidelines
2014/937
§40*

The annual report of a UCITS should contain details of the following:

- a) the underlying exposure obtained through financial derivative instruments;
- b) the identity of the counterparty(ies) to these financial derivative transactions; and
- c) the type and amount of collateral received by the UCITS to reduce counterparty exposure.

The only information regarding the definition of the scope of derivatives behind the wording “financial derivative instruments” is an ESMA position, which in its “Questions & Answers” document dated March 2013, refers to “any financial derivative instrument by which UCITS gain exposure to an asset”.

Similarly, ESMA does not provide clear/strict requirements in its guidance on the manner to disclose this information and how detailed it should be. As such, in absence of any formal guidelines, it is the responsibility of the UCITS to define the way this information will be disclosed taking into account some basic concepts such as proportionality (the analysis has to be done based on certain factors such as the size of the exposure of the fund to derivatives instruments, the number of open contracts, etc.).

As an example, several options could be considered to disclose the name of counterparties of certain derivative instruments where the Fund has a significant number of open contracts (e.g. forward foreign exchange contracts):

- The name of counterparty could be indicated for each individual open contract;
- A list of the counterparties' names (eligible or active as at the date of the financial statements) could be disclosed;
- A table summarising the name of each counterparty and the corresponding exposure as at the date of the financial statements could be included.

Similarly, the information of the underlying exposure obtained through the total return swaps open as at closing date should be disclosed in the annual report. Once again, there are no clear guidelines on the level of detail required for the underlying exposure. As such, several options can be considered:

- Disclose the full composition of the underlying basket of securities or
- Include in the description of the total return swap sufficient qualitative and quantitative information to enable the reader of the financial statements to understand the underlying exposure (ex: nature of securities, number of securities, geographical or sector exposure, etc).

Refer to Appendix 1 for Securities Financing Transactions Regulation disclosures in annual and semi-annual reports.

Securities Financing Transaction Regulation (“SFTR”) (Applicable to UCITS AND AIFs)

EU 2015/2365

SFTR is an EU regulation on Transparency of Securities Financing Transactions adopted by the EU parliament on 29 October 2016.

ESMA Technical Standards under SFTR and certain amendments to EMIR (March 2017)

Securities Financing Transactions (SFTs) and total return swaps allow market participants to access secured funding, i.e. to use their assets to finance themselves. This involves the temporary exchange of assets as a guarantee for a funding transaction. Examples of SFTs are lending, borrowing of securities, repurchase, or reverse repurchase transactions, buy-sell back or sell-buy back transactions, or margin lending transactions.

The Regulation enhances transparency in three ways:

- It introduces the reporting of all SFTs and total return swaps, except those concluded with central banks, to central databases known as trade repositories;
- Investment funds will have to start disclosing information on the use of SFTs and total return swaps to investors in their regular reports and in their pre-contractual documents; and
- The Regulation introduces some minimum transparency conditions that should be met on the reuse of collateral, such as disclosure of the risks and the need to grant prior consent.

The disclosures are required to be included in all semi-annual (for UCITS) and annual reports (for UCITS and AIFs) published after 13 January 2017 as clarified by ESMA in its Q&A published on 6 October 2016.

The regulation applies to counterparties of Securities Financing Transactions (SFTs) and total return swaps that are established in the EU or in a third country (if the SFT is concluded in the course of operations of a branch in the Union of that counterparty).

Chap 1 Art 3 (11) (EU) 2015/2365

Primary Transactions covered by the SFT Regulations include:

- a) Repurchase transaction;
- b) Buy / Sell back transaction;
- c) Securities lending;
- d) Total Return swaps.

The information to be provided in the annual report (UCITS and AIFs) and semi-annual reports (UCITS) is listed in the Annex of the Regulation.

Annual reports and semi-annual reports (when applicable) should include:

**ANNEX -
Section A
(EU) 2015/2365**

Global Data	Type of income or expense
<ul style="list-style-type: none"> • Amount of securities/commodities on loan as a proportion of total lendable assets excluding cash and cash equivalents • Amount of assets engaged in each type of SFT or total return swap, expressed as an absolute amount (in the currency of the fund) and as a proportion of AUM 	<ul style="list-style-type: none"> • Amount of collateral reused, compared with the maximum amount disclosed to investors • Cash collateral reinvestment returns to fund
Concentration data	
<ul style="list-style-type: none"> • Ten largest collateral issuers across all SFTs and total return swaps, with volume breakdown per issuer name • Top ten counterparties of each type of SFTs and total return swaps, including counterparty name and gross volume of outstanding transactions 	
Safekeeping of collateral received by the fund as part of SFTs and total return swaps	Safekeeping of collateral granted by the fund through SFTs and total return swaps
<ul style="list-style-type: none"> • Number and name of custodians and amount of collateral held in safekeeping by each 	<ul style="list-style-type: none"> • Proportion of collateral held in segregated, pooled or other accounts
Aggregate transaction data for each type of SFT and total return swaps	Data on return and cost for each type of SFT and total return swaps,
<ul style="list-style-type: none"> • Type and quantity of collateral • Maturity tenor of collateral broken down into seven maturity buckets, ranging from less than one day to open • Currency of collateral • Maturity tenor of SFTs and total return swaps broken down by seven maturity buckets, ranging from less than one day to open • Country in which the counterparties are established • Settlement and clearing of trade (e.g. tri-party, CCP, bilateral) 	<ul style="list-style-type: none"> • Broken down between fund, fund manager and third parties (e.g. agent lender) in absolute terms and as a percentage of overall returns generated by relevant type of SFT and total return swaps

Guidance:

Funds may be constituted under the law of contract (as common funds managed by a management company (“Fonds Commun de Placement” or “FCP”)), or under statute (as investment company (“Société d’Investissement à Capital Variable” or “SICAV”)). This illustrative annual report has been prepared assuming the fund is a SICAV. In addition to some specific disclosures to be made in case of a FCP (highlighted in the report), the following terms need to be amended throughout the report:

Denominations for a SICAV Société d’Investissement à Capital Variable	Denominations for a FCP Fonds Commun de Placement
Date of incorporation	Date of inception
Shares (representing participation in the capital of the SICAV)	Units
Shareholder	Unitholder
Board of Directors of the fund	Board of Directors of the management company
R.C.S number	R.C.S. K of the FCP

- Cases where the reporting period is less than or exceeds 12 months (maximum 18 months), the annual report should not refer to a financial “year” but to a “period”.
- The R.C.S./R.C.S. K number must be added on the cover page of the annual report.
- For the first financial period, the wording “for the year ended” should be replaced with “for the period from [date] (date of incorporation) to [closing date]”. Note that a first financial period exceeding 12 months (maximum 18 months) is only possible if foreseen in the prospectus of the Fund.

Illustrative annual report

Part I (UCITS) / Part II

The illustrative annual report has been prepared for Part I funds (UCITS). It can be used as the basis for the preparation of the Part II funds' annual report, except for the following disclosures that are not required for Part II funds:

- Risk management required disclosures (VaR);
- ESMA guidelines on ETFs and other UCITS issues (ESMA/2014/937);
- Investment restrictions in other transferable securities or money market instruments (Art 41 (2) of the Law of 17 December 2010, as amended);
- Master/Feeder structure (Art. 82 (2) of the Law of 17 December 2010, as amended);
- Management fees for Funds investing in target funds (Art. 46 (3) of the Law of 17 December 2010, as amended);
- ESMA mandatory disclosure for derivatives instruments.

Information to be included in the UCITS periodic report

I. Statement of assets and liabilities detailing:

- transferable securities;
- bank balances;
- other assets;
- total assets;
- liabilities;
- net asset value

II. Number of shares/units in circulation

III. Net Asset Value (NAV) per share/unit

IV. Portfolio, distinguishing between:

- a) transferable securities admitted to official stock exchange listing;
 - b) transferable securities dealt in on another regulated market;
 - c) recently issued transferable securities of the type referred to in article 41(1) d);
 - d) other transferable securities of the type referred to in article 41(2) a);
- and analysed in accordance with the most appropriate criteria in the light of the investment policy of the UCITS (e.g. in accordance with economic, geographical or currency criteria) as a percentage of net assets; for each of the above investments the proportion it represents of the total assets of the UCITS should be stated.

Statement of changes in the composition of the portfolio during the reference period/year.

Comment:

Even if explicitly mentioned in the amended Law of 17 December 2010, the statement of changes in composition of portfolio (i.e. purchases and sales) does not have to be included in the annual report but have to be made available upon shareholder's request. A clear statement should be included in the annual report indicating that the information is available and where it can be obtained.

V. Statement of the developments concerning the assets of the UCITS during the reference period/year including the following:

- income from investments;
- other income;
- management charges;
- depositary's charges;
- other charges and taxes;
- net income;
- distributions and income reinvested;
- increase or decrease of the capital account;
- appreciation or depreciation of investments;
- any other changes affecting the assets and liabilities of the UCITS;
- transaction costs, which are costs incurred by a UCITS in connection with transactions on its portfolio.

VI. A comparative table covering the last three financial years and including, for each financial year-end, at the end of the financial year:

- the total net asset value;
- the net asset value per share/unit.

VII. Details, by category of transactions within the meaning of Article 42 of the Law of 17 December 2010, as amended carried out by the UCITS during the reference period, of the resulting amount of commitments.

[Name of the Fund]
[SICAV/FCP]
R.C.S. Luxembourg B[]/R.C.S. K []

Audited annual report as at [closing date]

This report does not constitute an offer of shares. No subscription can be received on the basis of financial reports. Subscriptions are only valid if made on the basis of the current prospectus, supplemented by the latest available annual report of the fund and the latest semi-annual report if published after such annual report.

[Name of the Fund]
Audited annual report as at [closing date]

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[Name of the Fund]
Audited annual report as at [closing date]

Management and administration of the Fund¹

Guidance:

This section aims at describing the main players in the supervision/operating activities of the Fund. It needs to be tailored in accordance with the Fund's specific organisation and in line with the latest available prospectus published before year-end.

Registered office of the fund/management company²/AIFM

[Name of the Company]

[Address]

Board of Directors

Chairman

[Name of the Chairman]

[Name of the Company]

[Function]

[Address]

Directors

[Name of the Director]

[Name of the Company]

[Function]

[Address]

[Name of the Director]

[Name of the Company]

[Function]

[Address]

Depository bank

[Name of the Depository bank]

[Address]

Domiciliation agent

[Name of the domiciliation agent]

[Address]

Investment manager

[Name of the investment manager]

[Address]

**Administrative agent,
transfer agent and paying agent**

[Name of the administrative agent, transfer
agent and paying agent]

[Address]

Auditor

[Name of the auditor]

[Address]

Management company²/AIFM

[Name of the management company/AIFM]

[Address]

1. Best practice is to disclose changes made during the year with the relevant effective date.
2. All FCPs have a management company/AIFM. For SICAVs, this is possible but not required (e.g. self-managed SICAVs).

[Name of the Fund]
Audited annual report as at [closing date]

Activity report

Section 9 of the
Law of 10 August
1915, status as of
1st January 2020

Art 68 (2) of
the Law of 19
December 2002,
as amended

Art 151 (3) of
the Law of 17
December 2010,
as amended

Art 68bis of
the Law of 19
December 2002,
as amended

ESMA Guidelines
2014/937

1. Content

The annual report must include a report on the activities of the past financial year.

The Law defines as minimum content of the activity report the following information:

The activity report must include a fair review of the development of the fund business and of its position which provides clarification on the data shown in the annual accounts.

Generally, the presentation of the fund's business for the financial year and of its position may be described with the following points:

- fund's environment;
- international activities;
- changes in the financial situation;
- NAV;
- changes in revenues;
- significant investments and disinvestments;
- justification of positions involving a value judgment;
- performance of the fund;
- etc.

The report should also give an indication of:

- any significant events that have occurred since the end of the financial year;
- the fund's likely future development.

If the fund's performance is compared to a benchmark in the activity report, both need to be considered at the same valuation point. In addition, the fund's performance should be consistent with the figures disclosed in the annual report (NAV per share mentioned in the statistical information).

2. Supplementary disclosure

The following note needs to be disclosed (PwC best practice):

"The figures stated in this report are historical and not necessarily indicative of future performance".

3. Corporate Governance

In the context of increased transparency to shareholders, a statement indicating which corporate governance principles are applied by the Board of Directors of the Fund, could be added in the activity report.

Illustrative disclosure:

"The Board of Directors has adopted the ALFI Code of Conduct (the "Code") which sets out principles of good governance. The Board of Directors considers that the Fund has been in compliance with the Code in all material aspects throughout the financial year ended [closing date]."

4. Index-tracking UCITS

Illustrative disclosure in case of index-tracking UCITS:

"The performance of the Fund for the year ended [closing date] is [X%] while the [name of the index tracked] increased/decreased by [Y%]. This difference is due to [Explanation of the annual difference between the performance of the UCITS and the performance of the index tracked].

As at year-end, the size of the tracking error is [X] compared to an anticipated tracking error of [Y]. This difference is due to [Explanation of the divergence between the target tracking error and the actual tracking error for the period under review]."

[Name of the Fund]
Audited annual report as at [closing date]

Activity report (continued)

CSSF
Circular 11/512

ESMA guidelines
10/788

Guidance:

Risk Management required disclosures (UCITS only)

The guidance for UCITS applying the commitment approach to determine the global exposure is provided in Illustrative wording 1 below; guidance for UCITS applying the VaR methodology to determine the global exposure is provided in Illustrative wording 2 below.

Illustrative wording 1: Global Market Risk Exposure

The Board of Directors of the Fund decided to adopt the commitment approach to determine the global market risk exposure.

Illustrative wording 2: Global Market Risk Exposure

The global market risk exposure information for the year ending [closing date], is as follows:

Subfund	Global Risk calculation Method	VaR Model	Reference Portfolio	VaR limit	Lowest utilisation of VaR limit	Highest utilisation of VaR limit	Average utilisation of VaR limit	Average level of leverage reached during the year
[name]	Commitment	N/A	N/A	N/A	N/A	N/A	N/A	N/A
[name]	Absolute VaR	[Variance/Covariance]/ [Historical simulation]/ [Monte Carlo simulation]	N/A	[%]	[%]	[%]	[%]	[value]
[name]	Relative VaR	[Variance/Covariance]/ [Historical simulation]/ [Monte Carlo simulation]	[reference portfolio name]	[%]	[%]	[%]	[%]	[value]

For certain sub-funds, the global exposure is calculated and monitored daily by using the Value at Risk (VaR) calculation methodology. The observation period is at least 250 days.

The VaR methodology provides an estimate of the maximum potential loss over a specific holding period and at a given interval of confidence, i.e. probability level. The holding period is one month (20 business days) and the interval of confidence is 99%. For example, based on the assumptions and limitations of the selected model, a VaR estimate of 3% on 20-days holding period with a 99% interval of confidence means that, with 99% certainty, the percentage of the sub-fund can expect to lose over the next 20-days period a maximum of 3%.

Leverage level

The level of leverage disclosed in the above table is calculated based on the sum of notional.

Audit report

The audit report will be provided by the audit team which will be tailored to the specific fund including the applicable reporting framework and auditing standards.

[Name of the Fund]
Audited annual report as at [closing date]

Statement of net assets as at [closing date]

Guidance:

For all statements, captions that are not applicable to the fund's activity should be removed. The aggregation of captions is possible at the discretion of the Board of Directors of the Fund. The statements should however include all relevant captions required by Schema B of the Law.

		[Name of sub-fund 1 CCY]	[Name of sub-fund 2 CCY]	Combined [CCY]
	Notes			
Assets				
Investments at market value				
(Cost of investments*)	2.2			
Options bought at market value	2.9-13			
Cash at bank				
Time deposit				
Due from brokers	2.10			
Receivable on investments sold	2.8			
Receivable on subscriptions				
Receivable for repurchase agreements	2.12			
Unrealised appreciation on forward foreign exchange contracts	2.11-16			
Unrealised appreciation on futures contracts	2.10-15			
Unrealised appreciation on swap contracts/ swap contracts at market value	2.14, 2.15, 2.16, 2.17, 2.18 -14			
Unrealised appreciation on contracts for difference	2.13, 17			
Dividends receivable	2.4			
Interest receivable	2.4			
Formation expenses, net of amortisation	2.19			
Other assets/receivables				
Total assets	

*Disclosure of cost of investment is optional (either in the statement of net assets or in the statement of investments)

The accompanying notes form an integral part of these financial statements.

[Name of the Fund]
Audited annual report as at [closing date]

		[Name of sub-fund 1 CCY]	[Name of sub-fund 2 CCY]	Combined [CCY]
	Notes			
Liabilities				
Options written at market value	2.9-13			
Bank overdraft				
Payable on investments purchased	2.8			
Payable on redemptions				
Due to brokers	2.10			
Payable for reverse repurchase agreements	2.12			
Unrealised depreciation on forward foreign exchange contracts	2.11-16			
Unrealised depreciation on futures contracts	2.10-15			
Unrealised depreciation on swap contracts/ swap contracts at market value	2.14, 2.15, 2.16, 2.17, 2.18 - 14			
Unrealised depreciation on contracts for difference	2.13, 17			
Management fees payable	3			
Investment management/advisory fees payable	5			
Depositary bank fees payable	7			
Transfer agent fees payable	8			
Administrative agent and domiciliation agent fees payable	4			
Performance fees payable	6			
Subscription tax payable ("taxe d'abonnement")	10			
Dividends payable to shareholders	12			
Other payables/liabilities				
Total liabilities	
Net assets at the end of the year/period	
Number of shares outstanding				
[class X]				
[class Y]				
Net Asset Value per share				
[class X]				
[class Y]				

IRE TN2019-19

Guidance:

In case of liquidation of a sub-fund, the following must be considered:

- If all the assets and liabilities of the liquidated sub-funds have been settled: there is nothing to disclosed in the statement of net assets.
- If all the assets and liabilities of the liquidated sub-funds have not been settled: material remaining assets and liabilities must be disclosed in the annual report. PwC best practice is to include in a note to the financial statements providing the detail of the remaining assets/liabilities at the closing date.

The accompanying notes form an integral part of these financial statements.

[Name of the Fund]
Audited annual report as at [closing date]

Statement of operations and changes in net assets for the year/period ended [closing date]

		[Name of sub-fund 1 CCY]	[Name of sub-fund 2 CCY]	Combined [CCY]
	Notes			
Net assets at the beginning of the year/period				
Income				
Dividend income, net of withholding taxes	2.4			
Interest income on bonds, net of withholding taxes	2.4			
Interest income on repurchase agreements	2.12			
Interest income on swap contracts	2.14, 2.15, 2.16, 2.17, 2.18			
Other income				
Total income	
Expenses				
Management fees	3			
Investment management/advisory fees	5			
Performance fees	6			
Depository bank fees	7			
Transfer agent fees	8			
Administrative agent and domiciliation agent fees	4			
Distribution fees	9			
Professional fees				
Subscription tax ("taxe d'abonnement")	10			
Amortisation of formation expenses	2.19			
Bank and interest expense				
Interest expense on reverse repurchase agreements	2.12			
Interest expense on swap contracts	2.14, 2.15, 2.16, 2.17, 2.18			
Transaction costs ³	[22]			
Other expenses ⁴	11			
Total expenses	
Net investment income/(loss)	

The accompanying notes form an integral part of these financial statements.

3. Alternatively, transactions costs can be disclosed in the notes to the financial statements.
4. When other expenses > 10% total expenses – Best practice is to add a note detailing this caption (cfr illustrative of notes)

[Name of the Fund]
Audited annual report as at [closing date]

		[Name of sub-fund 1 CCY]	[Name of sub-fund 2 CCY]	Combined [CCY]
	Notes			
Net investment income/(loss) (carried forward from previous page)	
Net realised gains/(losses)				
- on investments	2.7			
- on options	2.9			
- on forward foreign exchange contracts	2.11			
- on futures contracts	2.10			
- on contracts for difference	2.13			
- on swap contracts	2.14, 2.15, 2.16, 2.17, 2.18			
- on foreign currency	2.5			
Net realised gains/(losses) for the year/period	
Change in net unrealised appreciation/ depreciation				
- on investments				
- on options	2.9			
- on forward foreign exchange contracts	2.11			
- on futures contracts	2.10			
- on contracts for difference	2.13			
- on swap contracts	2.14, 2.15, 2.16, 2.17, 2.18			
Change in net unrealised appreciation/ depreciation for the year/period	
Result of operations for the year/period	
Subscriptions				
Redemptions				
Dividends paid	12			
Exchange difference				
Net assets at the end of the year/period	

IRE-TN2019-19

Guidance:

In case of liquidation, sub-fund's profit and loss activity of the period must be disclosed.

The accompanying notes form an integral part of these financial statements.

[Name of the Fund]
Audited annual report as at [closing date]

Statistical information

Guidance:

All share classes need to be indicated. In case some share classes are not active at year-end, they still need to be disclosed in the historical data for the year when they were active (N-1 to N-2).

	Year-end [N] [CCY]	Year-end [N-1] [CCY]	Year-end [N-2] [CCY]
Total net assets			
[Name of sub-fund]			
Total net assets			
Number of shares outstanding			
[class X]*			
[class Y]			
NAV per share			
[class X]*			
[class Y]			

* In case of a share class liquidation/merger during the year, best practice is to indicate the latest available information (NAV/share, number of shares outstanding and date of liquidation/merger).

In case of the financial statements of certain sub-funds have been prepared on a non-going concern basis (Refer to Note 2.1), to enable the investors to reconcile the NAV disclosed in the audited financial statements ("audited NAV") with the NAV published at financial year-end, it is best practice to disclose both the audited NAV and the NAV published in the statistical section of the annual report (total NAV and NAV per share over the last three financial years), with a note to the financial statements explaining the origin of the difference (refer to example included in Note 2.1).

[Name of the Fund]
Audited annual report as at [closing date]

[Name of the sub-fund]
Statement of investments as at [closing date] (expressed in [CCY])

Schema B
- Annex I of
the Law of 17
December 2010,
as amended

Guidance:

The Law of 17 December 2010, as amended, requires a clear distinction between "Transferable securities admitted to an official stock exchange listing" and "Transferable securities dealt in on another regulated market". In practice, as the investment limits are similar for investments in both categories, the merger of both categories is commonly made. The investment portfolio needs to be allocated over the categories mentioned below, as defined in the Law, when applicable. Any additional sub-division (by country, currency, etc.) can be considered within this framework.

Nominal/quantity	Description	Security currency	Market value [CCY]	Market value as a percentage of net assets %
Transferable securities admitted to an official stock exchange listing/dealt in on another regulated market*				
Shares	Total shares			
Bonds	Total bonds			
Warrants/rights	Total warrants/ rights			
Total transferable securities admitted to an official stock exchange listing/ dealt in on another regulated market		
Other transferable securities*				
Shares	Total shares			
Bonds	Total bonds			
Warrants/rights	Total warrants/ rights			
Total other transferable securities*		
Open-ended Investment Funds**				
Open ended Investment Funds				
Total open-ended Investment Funds		
Total investments		

The accompanying notes form an integral part of these financial statements.

* In case of recently issued securities, the Schema B requires a separate disclosure

** Best practice disclosure

[Name of the Fund]
Audited annual report as at [closing date]

[Name of the sub-fund]
Economic classification of investments as at [closing date] (as a percentage of net assets)

Schema B
 - Annex I of
 the Law of 17
 December 2010,
 as amended

Guidance:

The investment portfolio needs to be allocated based on the most appropriate criteria in the light of the investment policy of the respective sub-funds. This allocation can be made by industry, geographical area, currency or any other relevant criteria. The following classification is provided as an example.

	% of net assets
Aerospace industry	
Agriculture and fishery	
Aluminium	
Bank and other credit institutions	
Chemistry	
Coal mining and steel industry	
Communications	
Conglomerates	
Construction and other building machinery	
Construction of machines and apparatuses	
Electronics and electrical engineering	
Energy and water	
Gastronomy	
Government and public authorities	
Graphics and publishing	
Insurance	
...	
...	
Total%

[Name of the Fund]
Audited annual report as at [closing date]

[Name of the sub-fund]
Geographical classification of investments as at [closing date]
(as a percentage of net assets)

	% of net assets
Australia	
Austria	
Belgium	
Bermuda	
Brazil	
Canada	
Cayman Islands	
China	
Croatia	
Czech Republic	
Denmark	
...	
...	
Total%

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date]

Note 1 - General information

For a FCP - specific disclosure

[Name of the FCP] (the Fund) is an open-ended investment fund and has been created on [date] as a FCP ("Fonds Commun de Placement"). The Fund is governed by the provisions of the Part I/Part II of the Law of 17 December 2010, as amended, relating to Undertakings for Collective Investments.

The Fund is an unincorporated co-proprietorship of its securities and other assets, managed by [management company name] (the "Management Company"). The assets of the Fund are segregated from those of the Management Company.

For a SICAV

[Name of the SICAV] (the Fund) is an open-ended investment fund and has been incorporated on [date] under Luxembourg laws as a "Société d'Investissement à Capital Variable" for an unlimited period of time. The Fund is governed by the provisions of Part I/Part II of the Law of 17 December 2010, as amended, relating to Undertakings for Collective Investments.

The Fund comprises various sub-funds, each relating to a separate investment portfolio of securities, cash and other assets. Separate classes of shares are issued in relation to the sub-funds.

The Board of Directors of the Fund may authorise the creation of additional sub-funds/share classes in the future.

The Board of Directors of the SICAV has appointed (name of Management Company) as Management Company of the SICAV within the meaning of Chapter 15 of the Law of 2010. (Name of the Management Company) was incorporated on XXXXXX as a corporation (société anonyme) under the laws of Luxembourg for an unlimited duration. It has its registered office at XXXXXX. Its Articles of Incorporation were initially published in the Mémorial on XXXXXX.

The Fund has appointed [name of Alternative Investment Fund Manager] as AIFM within the meaning of the AIFM Law of 12 July 2013, in accordance with the terms and conditions of the AIFM Services Agreement, effective as from 22 July 2014. In this respect, the AIFM is responsible for investment management services, administration, including valuation of the assets of the Fund, registrar and transfer agency services, marketing, domiciliation and activities related to the assets of the Fund. The AIFM is further responsible for the management of conflict of interest and the control of the well-informed status of the investors or Shareholders.

As at [closing date], the following [number] sub-funds are active:

- [name of the sub-fund]
- [name of the sub-fund]
- ...

Guidance:

PwC best practice: The list of all share classes available for subscription and their specific features (distribution, capitalisation, fee level, etc.) should be disclosed. The information should be similar to the description in the Fund's prospectus.

During the year, the following changes were made:

- 1) Launch of sub-fund(s):
 - On [date], [name of the sub-fund] has been launched
- 2) Change in name of sub-fund(s):
 - On [date], [name of the sub-fund] became [new name of the sub-fund]
- 3) Merger(s): (indicate share exchange ratio)
 - On [date], [name of the sub-fund] merged with [name of the sub-fund]
- 4) Liquidation of sub-fund(s):
 - On [date], [name of the sub-fund] has been liquidated

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date] (continued)

Note 1 - General information (continued)

In each sub-fund, the Fund may issue shares in the following categories, which differ mainly in respect of fees, commissions and distribution policy:

- [class X: insert specificity]
- [class Y: insert specificity]

Guidance:

The Master / Feeder disclosure below is mandatory for Part I funds.

The following sub-funds are involved in a master-feeder structure:

Master sub-fund	Feeder sub-fund	Currency	Amount if aggregate charges	Aggregate charges in %	% of ownership of the Master UCITS

The information regarding the description of the master-feeder structures, the investment objectives and policy of the Master UCITS is detailed in the prospectus of the Fund.

The audited financial statements and the prospectus of the Master UCITS and Feeder UCITS are available on www.xxxxxxx.com.

Note 2 - Significant accounting policies

2.1 Presentation of the financial statements

Guidance:

Financial statements under Luxembourg GAAP are prepared on a going concern basis of accounting, unless management either intends to liquidate the entity or to cease operations, or has no realistic alternative but to do so.

Non-going concern basis of accounting should be used for the preparation of the financial statements, in the following circumstances:

- 1) The decision to liquidate the fund or close a sub-fund is taken by the Board of Directors of the fund or by the Board of Directors of the Management Company in the case of a voluntary liquidation/closure or is taken by the Court in the context of a compulsory liquidation. This decision can occur prior to the fund/sub-fund year-end or after the fund/sub-fund year-end.
- 2) The Board of Directors of the fund or the Board of Directors of the Management Company intend to liquidate the fund or close a sub-fund within period covered by their assessment (at the 12 months following the date of the financial statements).

Art 82 (2) of
the Law 17
December 2010,
as amended

IRE-NT2019-19

The financial statements are prepared in accordance with Luxembourg legal and regulatory requirements relating to investment funds under the going concern basis of accounting [except for the sub-funds [name the sub-funds impacted]. As indicated in Note 1 and Note 23, these sub-funds were put in liquidation during the year/period ended or are expected to be liquidated within XX months following [closing date]. As such, the financial statements for these sub-funds have been prepared on a non-going concern basis.

Non-going concern basis of accounting

For the sub-funds for which the financial statements have been prepared on a non-going concern basis, the following accounting policies differ from those described in the notes 2.2 through 2.19:

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date] (continued)

Note 2 - Significant accounting policies (continued)

- Expected liquidation expenses have been accrued for;
- Any remaining formation expenses have been fully expensed;
- The valuation of the sub-funds' investments is based on their net realisable value;

As a result of the application of above accounting policies, the net asset value of these sub-funds differs from their published net assets value as of the closing date as follows:

Sub-fund name	Currency
Published NAV	XX
Liquidation expenses	(XX)
Valuation adjustments	XX
Formation expenses	(XX)
NAV on a non-going concern basis	XX

Guidance:

Alternatively, when the application of the non-going concern basis of accounting does not lead to material differences, a statement to that effect can be included instead of the above table. 'The application of the non-going concern basis of accounting has not led to material adjustments to the sub-funds' published net asset value'.

2.2 Valuation of investments in securities

a) Securities valuation policy

Guidance:

Each investment fund may have specific valuation rules. The disclosure below needs to be amended to include the valuation principles specific to the Fund (described in the prospectus), and the type of investments the Fund is exposed to. The note should cover any type of investments present at year-end, as well as those that had been held during the financial year, which had a significant impact on the Fund's performance.

Where fair valuation process is used, additional information on the methodology applied should be disclosed including key inputs and assumptions.

*Art 9 (3)
Law of 17
December 2010,
as amended*

Securities listed on a recognised stock exchange or dealt in on any other regulated market that operates regularly, is recognised and is open to the public, are valued at their latest available closing prices, or, in the event that there should be several such markets, on the basis of their latest available closing prices on the main market for the relevant security. Certain investments of the Fund may, depending upon market conditions, be traded in relatively thin markets and/or in markets that experience significant volatility. As a result of these conditions, the prices used to value securities may differ from the value that would be realised if these securities were sold, and the differences could be material.

In the event that the latest available closing price does not, in the opinion of the Board of Directors, reflect the fair market value of the relevant securities, the value of such securities is defined by the Board of Directors based on the reasonably foreseeable sale proceeds determined prudently and in good faith.

Securities not listed or traded on a stock exchange or not dealt in on another regulated market are valued on the basis of the probable sale proceeds determined prudently and in good faith by the Board of Directors of the Fund.

Short-term investments of sufficient credit quality maturing in less than 61 days are valued at amortised cost, which approximates fair market value. In the event of material changes in market conditions, the valuation basis of the investment is adjusted to market yield. Investments in open-ended UCIs are valued on the basis of the last available NAV of the units or shares of such UCIs.

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date] (continued)

Note 2 - Significant accounting policies (continued)

b) Fair valued securities

Guidance:

When fair value is applied to value all or part of the assets of the Fund, the notes to the financial statements should enable the reader to understand the valuation process implemented by the Board of Directors and its main components. Such disclosure should cover for example:

- the kind of assets covered;
- the frequency of the fair value review;
- key parameters used to assess fair value;
- the person/groups involved in the monitoring of this fair value process;
- any other relevant information.

During difficult market conditions (e.g. no liquidity, lack of information on trades, etc.), prices obtained for certain investments using different sources may not be representative of fair value. As a result, the Board of Directors of the Fund has implemented fair value techniques to estimate the fair value of these investments as at [date]. The fair value techniques implemented consist of [description of the fair value methodology and key inputs and assumptions used]. Because of the inherent uncertainty in the fair value process, these estimated values may significantly differ from those that would have been used had a market for the securities existed, and from the values that may be ultimately recovered.

The sub-funds with fair valued securities as at year-end are as follows:

Sub-fund	Currency	Market value of fair valued securities	% Net Assets

c) Derivative instruments valuation policy

A derivative is an instrument whose value is derived from an underlying instrument, index reference rate or a combination of these factors. Derivative instruments may be privately negotiated contracts, which are often referred to as over the counter ("OTC") derivatives or they may be listed and traded on an exchange.

Derivative instruments are stated at fair value and recognised as assets and liabilities in the statement of net assets. Gains and losses resulting from the change in the market value are reflected in the statement of operations as a component of change in unrealised gain/(loss). Realised gains or losses are recorded on termination or from periodic cash flow payments.

Futures contracts: The market value of futures contracts is based on exchange settlement/last sale prices, last bid or ask process on the exchange, or independent market quotes.

Options: The market value of an OTC option is determined by using counterparty supplied valuations, an independent pricing service or valuation models which use market data inputs supplied by a third-party pricing service. The market value of an exchange traded option is based on the exchange settlement/last sale prices, last bid or ask prices on the exchange, or independent market quotes provided by a pricing service or counterparty.

Forward foreign exchange contracts: The market value of these contracts is based on the forward exchange rate of the underlying currency on the valuation day.

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date] (continued)

Note 2 - Significant accounting policies (continued)

Swaps: The cash flows received and paid in connection with swap contracts are converted to present value on the valuation date corresponding to the maturity of these cash flows. The value of the swap contracts is the difference between these two present value conversions. The market value is obtained from third party pricing agents, market makers or internal models.

Contracts for difference: The market value of CFDs is determined by the last known traded price on the exchange on which the underlying securities or assets are traded or admitted for trading. For underlying securities traded on markets closing after the time of the valuation, last known prices as of this time or such other time may be used.

d) Additional information – Published NAV vs NAV as of closing date

Guidance:

The annual report is presumed to be prepared using closing prices as of the last business day in the reporting period. When the NAV computed for trading purposes is not based on closing price (use of previous day closing price or intraday pricing), the financial statements should be based on a NAV calculated for financial reporting purposes as of the closing date and a reconciliation between the published NAV and the NAV established for financial reporting purposes should be included in the notes to the financial statements. In practice, when the activity between the two NAVs is material but not pervasive, a note to the financial statements can be added to provide the description of the material differences. When the activity between the two NAVs is pervasive, the financial statements should be updated to reflect the activity including the valuation as of the closing date.

If the NAV had been calculated using closing prices as at [closing date], the NAV of the following sub-funds would have significantly been increased / (decreased) as follows:

Sub-fund name	Variation (%)

The NAV of the other sub-funds would not have been significantly different.

2.3 Combined financial statements

Guidance:

This note is not applicable in case of stand-alone structures (i.e. no sub-fund).

IML
Circular 91/75
Chapter L

The accounts of the Fund are expressed in [CCY] and the accounts of the sub-funds are kept in the currency of each sub-fund. The combined statement of net assets and the combined statement of operations and changes in net assets are the sum of the statement of net assets, the statement of operations and changes in net assets of each sub-fund converted into the currency of the Fund using exchange rates prevailing at year-end. [All cross sub-fund investment related amounts have been eliminated from the calculation of the combined figures].

Guidance:

The combined statement of operations and changes in net assets could also be converted using the average exchange rate of the year then ended. In such a case, a caption "exchange difference" should be inserted in this statement.

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date] (continued)

Note 2 - Significant accounting policies (continued)

Cross sub-fund investments

*Art. 181 (8) Law
of 17 December
2010, as amended*

At [closing date], the total cross sub-fund investment amounted to [CCY] and therefore the total combined Net Assets at year-end without cross sub-fund investments would amount to [CCY].

2.4 Dividend and interest income

Dividends are shown net of withholding tax deducted at source and are recorded as income on the ex-dividend date. Interest income is accrued on a daily basis over the life of the investment.

2.5 Foreign currency translation

The reference currency of the Fund is [CCY] and the combined statements are expressed in that currency. The books and records of each sub-fund are denominated in the reference currency of the corresponding sub-fund.

The acquisition cost of securities expressed in a currency other than the reference currency of the respective sub-funds is translated at the exchange rates prevailing on the date of purchase.

Income and expenses expressed in currencies other than the reference currency of the respective sub-funds are converted at exchange rates ruling at the transaction date.

Assets and liabilities expressed in currencies other than the reference currency of the respective sub-funds are converted at exchange rates prevailing at year-end.

Reported realised foreign currency gains or losses arise from the disposition of foreign currency, purchase of foreign currency in certain countries (e.g. Brazil) that impose a tax on such purchases, currency gains or losses realised between the trade and settlement dates on securities transactions, and the difference between the amounts of dividends, interest and foreign withholding taxes recorded on each sub-fund's books on the transaction date and the [CCY] equivalent of the amounts actually received or paid.

Unrealised foreign exchange gains and losses arise from changes (due to the changes in the exchange rate) in the value of foreign currency and other assets and liabilities denominated in foreign currencies, which are held at year end. The realised or change in unrealised gains and losses on foreign exchange are recognised in the statement of operations and changes in net assets.

Here are the principal exchange rates applied at year-end:

1 [CCY] = CHF [amount]
EUR [amount]
GBP [amount]
SEK [amount]
USD [amount]

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date] (continued)

Note 2 - Significant accounting policies (continued)

2.6 Swing pricing/dilution levy

ALFI Swing
Pricing February
2011
FAQ CSSF 23
March 2020

Guidance:

The application of swing pricing/dilution levy is only possible when it is specifically prescribed in the Fund's prospectus. In most cases, the swing price adjustment can be done through the application of a specific swing factor as described hereunder or the use of bid or ask prices to value the sub-fund portfolio. The note should be adapted based on the swing pricing methodology described in the Fund's prospectus.

A sub-fund may suffer dilution of the net asset value per share due to investors buying or selling shares in a sub-fund at a price that does not reflect dealing and other costs that arise when security trades are undertaken by the Investment Manager to accommodate cash inflows or outflows.

In order to counter this impact, a swing pricing mechanism has been adopted to protect the interests of shareholders of the sub-fund. If on any valuation date, the aggregate net capital activity of a sub-fund exceeds a pre-determined threshold, as determined and reviewed for each sub-fund on a periodic basis by the Board of Directors of the Fund, the net asset value per share will be adjusted upwards or downwards to reflect costs associated with net capital inflows or net capital outflows respectively.

The swing pricing mechanism may be applied across all sub-funds. The extent of the price adjustment is set by the Board of Directors to reflect dealing and other costs. The amount of the adjustment may vary from sub-fund to sub-fund and will not exceed [percentage]% of the original net asset value per share.

The table below discloses the sub-funds that are in scope of the swing price mechanism during the year/period.

For the sub-funds that applied swing price adjustments at the end of the year/period, the NAV per share/unit in each sub-fund's reference currency before swing price adjustment (the "un-swung NAV per share") and the NAV per share/unit in each sub-fund's reference currency after swing price adjustment (the "swung NAV per share") are disclosed.

Sub-fund	Share class/ Unit class	Currency	Un-swung NAV per share/unit	Swung NAV per share/unit
ABC	Dis 1	USD	XXX	XXX
XYZ	Cap 2	EUR	No swing price adjustment at year/period end	

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date] (continued)

Note 2 - Significant accounting policies (continued)

2.7 Realised gains and losses on sales of investments in securities

Guidance:

Realised gains and losses on the sales of investments in securities are usually determined on the average cost basis. Other principles such as FIFO are also acceptable. The accounting policy should however be applied consistently to compute realised gains/losses from one financial year to another.

Investments in securities are accounted for on a trade date basis. Realised gains and losses on sales of investments in securities are calculated on the average cost basis [and include transaction costs] [to delete if presented separately in the statement of operations and change in net assets].

2.8 Mortgage related securities – To Be Announced securities (TBAs)

Guidance:

TBAs can be disclosed separately on the statement of net assets and be excluded from the statement of investments. In this case, the market value of TBAs is included in the statement of net assets under the heading “Investment in TBAs at market value”.

The realised gains/(losses) and change in unrealised appreciation/depreciation on TBAs are disclosed in the statement of operations and changes in net assets respectively under the headings “Net realised gains/(losses) on TBAs” and “Change in net unrealised appreciation/depreciation on TBAs”.

A table including security description, currency, nominal value, market value and unrealised gains/(losses) should be inserted in notes to the financial statements.

TBA positions refer to the common trading practice in the mortgage backed securities market in which a security is to be bought from a mortgage pool (e.g. Ginnie Mae, Fannie Mae or Freddie Mac) for a fixed price at a future date. At the time of purchase the exact security is not known, but the main characteristics of it are specified. Although the price has been established at the time of purchase, the principal value has not been finalised.

TBA positions are disclosed in the statement of investments. The purchase of this type of security has not been settled and consequently, the amount corresponding to the payable due when the transaction is settled, is disclosed under “Payable on investments purchased” in the statement of net assets.

Negative positions in the statement of investments reflect the Fund’s sale commitments of TBAs. The amount corresponding to the receivable due when the transaction is settled, is disclosed under “Receivable on investments sold” in the statement of net assets.

The realised gains/(losses) on TBAs and changes in unrealised appreciation/depreciation are disclosed in the statement of operations and changes in net assets respectively under the headings “Net realised gains/ (losses) on investments” and “Change in net unrealised appreciation/depreciation on investments”.

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date] (continued)

Note 2 - Significant accounting policies (continued)

2.9 Options

A purchaser of a put option has the right, but not the obligation, to sell the underlying instrument at an agreed upon price ("strike price") to the option seller. A purchaser of a call option has the right, but not the obligation, to purchase the underlying instrument at the strike price from the option seller.

Purchased Options — Premiums paid by the Fund for purchased options are included in the statement of net assets as an investment. The option is adjusted daily to reflect the current market value of the option and the change is recorded as unrealised appreciation or depreciation. If the option is allowed to expire, the Fund will lose the entire premium it paid and record a realised loss for the premium amount. Premiums paid for purchased options which are exercised or closed are added to the amounts paid or offset against the proceeds on the underlying investment transaction to determine the realised gain/loss or cost basis of the security.

Written Options — Premiums received by the Fund for written options are included in the statement of net assets. The amount of the liability is adjusted daily to reflect the current market value of the written option and the change in market value is recorded as unrealised appreciation or depreciation. Premiums received from written options that expire are treated as realised gains. The Fund records a realised gain or loss on written options based on whether the cost of the closing transaction exceeds the premium received. If a call option is exercised by the option buyer, the premium received by the Fund is added to the proceeds from the sale of the underlying security to the option buyer and compared to the cost of the closing transaction to determine whether there has been a realised gain or loss. If a put option is exercised by an option buyer, the premium received by the option seller reduces the cost basis of the purchased security.

Written uncovered call options subject the Fund to unlimited risk of loss. Written covered call options limit the upside potential of a security above the strike price. Written put options subject the Fund to risk of loss if the value of the security declines below the exercise price minus the put premium.

The Fund is not subject to credit risk on written options as the counterparty has already performed its obligation by paying the premium at the inception of the contract.

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date] (continued)

Note 2 - Significant accounting policies (continued)

2.10 Futures contracts

ESMA 12/832
CSSF Circular
13/559

Futures contracts provide for the delayed delivery of the underlying instrument at a fixed price or for a cash amount based on the change in the value of the underlying instrument at a specific date in the future. Upon entering into a futures contract, the Fund is required to deposit with the broker, cash or securities in an amount equal to a certain percentage of the contract amount which is referred to as the initial margin account. Subsequent payments, referred to as variation margin, are made or received by the Fund periodically and are based on changes in the market value of open futures contracts.

Securities deposited as initial margin are designated in the statement of investments and cash deposited is recorded in the statement of net assets. A receivable and/or a payable to brokers for the daily variation margin is also recorded in the statement of net assets under due to/due from brokers.

2.11 Forward foreign exchange contracts

Forward foreign exchange contracts represent obligations to purchase or sell foreign currency on a specified future date at a price fixed at the time the contracts are entered into. Non-deliverable forward foreign exchange contracts are settled with the counterparty in cash without the delivery of foreign currency. Changes in the value of these contracts are recorded as unrealised appreciation or depreciation until the contract settlement date. When the forward foreign exchange contract is closed, the Fund records a realised gain or loss equal to the difference between the value at the time the contract was opened and the value at the time it was closed.

2.12 Securities lending, repurchase and reverse repurchase agreements

Circulars CSSF
08/356, CSSF
13/559, ESMA
2014/937

a) Securities lending

The Fund may lend securities included in its portfolio to a borrower. To guarantee this transaction, the Fund receives collateral. Securities on loan are delivered to a third party broker, the assets lent continue to be valued as part of the portfolio of the Fund. Upon termination of a loan, the Fund is required to return to the borrower the posted collateral. Loans are subject to termination by the Fund or the borrower at any time.

Securities lending generates additional income for the Fund according to the contracts. This remuneration is accounted for in the statement of operations and changes in net assets under "Other income".

ESMA 12/832
CSSF Circular
13/559

b) Repurchase and reverse repurchase agreements

A repurchase agreement ("repo") is the sale of a security with a commitment by the seller to buy the same security back from the purchaser at a specified price at a designated future date.

A reverse repurchase agreement ("reverse repo") is the purchase of a security with a commitment by the buyer to sell the same security back to the seller at a specified price at a designated future date.

By convention, whether the transaction is called a repo, or a reverse repo agreement is determined by viewing the transaction from the perspective of the dealer (i.e. the fund counterparty).

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date] (continued)

Note 2 - Significant accounting policies (continued)

A repurchase agreement is similar in effect to a loan by the Fund to the seller collateralised by the securities. The Fund does not record the purchase of the securities received but records the repurchase agreement as if it were a loan. The transaction is disclosed in the statement of net assets under “Receivable for repurchase agreements”, including any interest receivable on such transaction. Because a repurchase agreement between the two specific parties involved is generally for a relatively short time and is not transferable, it has no active market. The Fund carries repurchase agreements at cost, which, combined with accrued interest, approximates market value.

The interest income is recorded in the statement of operations and changes in net assets under “Interest income on repurchase agreements”.

Under a reverse repo agreement, the Fund sells a security to a buyer, usually a broker, for cash. The Fund does not record a sale of the security and agrees to repay cash plus interest at a later date in exchange for the return (repurchase) of the same security. The transaction is thus similar in effect to borrowing by the Fund collateralised by the securities. The proceeds are recorded in the statement of net assets under “Payable for reverse repurchase agreements”, including any interest payable on such transaction. The securities are marked to market. The interest expense is recorded in the statement of operations and changes in net assets under “Interest expense on reverse repurchase agreements”.

2.13 Contracts for difference

Contracts for difference are contracts entered into between a broker and the Fund under which the parties agree to make payments to each other so as to replicate the economic consequences of holding a long or short position in the underlying security. Contracts for difference also mirror any corporate actions that take place.

Upon entering into contracts for difference, the Fund may be required to pledge to the broker an amount of cash and/or other assets equal to a certain percentage of the contract amount (“initial margin”). Subsequently, payments known as “variation margin” are made or received by the Fund periodically, depending on fluctuations in the value of the underlying security.

2.14 Interest Rate Swaps and Cross Currency Swaps

An interest rate swap is a bilateral agreement in which each party agrees to exchange a series of interest payments for another series of interest payments (usually fixed/floating) based on a notional amount that serves as a computation basis which is usually not exchanged. A cross-currency swap is a bilateral agreement in which each party agrees to exchange two different currencies with an agreement to reverse the exchange at a later date at the same exchange rates. During the life of the swap, each party pays interest (in the currency of the principal received) to the other.

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date] (continued)

Note 2 - Significant accounting policies (continued)

2.15 Credit Default Swaps

A credit default swap is a credit derivative transaction in which two parties enter into an agreement, whereby one party (the protection buyer) pays the other (the protection seller) a fixed periodic coupon for the specified life of the agreement in return for a payment contingent on a credit event related to the underlying reference obligation.

If a credit event occurs, the protection seller would be obligated to make a payment, which may be either: (i) a net cash settlement equal to the notional amount of the swap less the auction value of the reference obligation or (ii) the notional amount of the swap in exchange for the delivery of the reference obligation. Selling protection effectively adds leverage to a Fund's portfolio up to the notional amount of swap agreements. The notional amount represents the maximum potential liability under a contract and is not reflected in the statement of net assets. Potential liabilities under these contracts may be reduced by: the auction rates of the underlying reference obligations; upfront payments received at the inception of a swap; and net amounts received from credit default swaps purchased with the identical reference obligation.

2.16 Total Return Swaps

A total return swap is a bilateral agreement in which each party agrees to exchange payments based on the performance of an underlying instrument represented by a security, commodity, basket or index thereof for a fixed or variable rate. One party pays out the total return of a specific reference asset, and in return, receives a regular stream of payments. The total performance will include gains and losses on the underlying, as well as any interest or dividends during the contract period according to the type of underlying. The cash flows to be exchanged are calculated by reference to an agreed upon notional amount or quantity. To the extent the total return of the reference asset underlying the transaction exceeds or falls short of the offsetting payment, the Fund will receive a payment from or make a payment to the counterparty.

2.17 Variance and Volatility Swaps

A variance swap is a bilateral agreement in which each party agrees to exchange cash flows based on the measured variance (or volatility for volatility swaps) of a specified underlying asset. One party agrees to exchange a "fixed rate" or strike price payment for the "floating rate" or realised price variance on the underlying asset with respect to the notional amount. At the maturity date, a net cash flow is exchanged, where the payoff amount is equivalent to the difference between the realised price variance of the underlying asset and the strike price multiplied by the notional amount.

2.18 Other swap contracts

Guidance:

Many swap contract types exist. Here is an indicative list of such contracts:

- equity swaps;
- asset swaps;
- correlation swaps;
- constant maturity swaps;
- inflation swaps.

The following note is a generic description applicable to swap contracts, describing how they work and how they are accounted for. This description has to be adapted to the specific swap contracts present in the Fund and their valuation/ accounting rules.

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date] (continued)

Note 2 - Significant accounting policies (continued)

The Fund may enter into swap contracts in which the Fund and the counterparty agree to exchange payments over time, according to a predetermined rule applying to both of them.

2.19 Formation expenses

Art. 53 Law of 10
August 1915, as
amended

Guidance:
Formation expenses should be amortised by using the method described in the Fund's Prospectus.

Formation expenses are amortised on a straight-line basis over a period of five years.

Note 3 - Management fees

Guidance:
This note needs to be tailored based on the actual fee structure of the Fund and the payment frequency. Best practice is to present the effective management fee rate applied during the year and not only a maximum amount.

In case the Fund is subject to an all-in-fee, the nature of the services covered needs to be described. In such situation, notes related to other fees need to be adapted. Any change in the fee structure during the year should also be indicated.

The Management Company is entitled to a fee payable at the end of [frequency] and calculated on the average NAV of each sub-fund during the [frequency].

[Name of the sub-fund]:	[name of the share class]: [name of the share class]:	[Management fee rate] % [Management fee rate] %
[name of the share class]:	[name of the share class]: [name of the share class]:	[Management fee rate] % [Management fee rate] %

Art. 46 (3) of
the Law of 17
December 2010,
as amended

Comment:
When a UCITS invests a substantial proportion of its assets in the units/shares of other UCITS and/or UCIs that are managed, directly or by delegation, by the same management company or by any other company with which the management company/the fund is linked by common management or control, or by a substantial direct or indirect control, it has to disclose in its annual report the maximum proportion of management fees charged both to the UCITS itself and to other UCITS/UCIs in which it invests.

The disclosure of this information is only mandatory in case of related party's target funds and if the percentage of those investments represents more than 50 % of the NAV of the Fund of Funds (at the closing date or at another date during the year).

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date] (continued)

Note 3 - Management fees (continued)

In addition, the Fund has invested in target funds managed by certain Investment Managers of Management Companies related to the Management Company of the Fund. Here are the management fees borne by those related parties' target funds:

Name of the related party's target fund	Maximum management fee (% of the NAV)	Maximum performance fee level
Target funds included in the portfolio of the Fund at year end		
[Fund name]	[management fee percentage]	[performance fee percentage and description]
Other target funds held during the year		
[Fund name]	[management fee percentage]	[performance fee percentage and description]

Note 4 - Administrative and domiciliary agent fees

The administrative and domiciliary agent is entitled to receive fees and commissions for its services rendered to the Fund, corresponding to [percentage] per annum of the average NAV of each sub-fund. Such fees are payable [frequency].

Note 5 - Investment management/advisory fees

The Fund pays to the investment manager/advisor a fee of [percentage] per annum of the average NAV of each sub-fund. Such fee is payable [frequency].

Note 6 - Performance fees

Comment:

The disclosure of performance fees model should be described in sufficient detail to enable the reader to understand the basis of calculation and its main components. The description is usually a "copy and paste" of the wording used in the prospectus of the Fund. Any change during the year should also be indicated.

The investment manager/adviser is entitled to receive a performance fee in addition to the investment/ advisory management fee.

Pursuant to the investment management agreement, the investment manager is entitled to receive from the net assets of certain sub-funds or classes of shares, an annual performance-based incentive fee equal to the given percentage of the share class return in excess of the benchmark return and the high-water mark where applicable. On each valuation day, an accrual for the previous valuation day's performance fee is made, when appropriate, and the final performance fee is payable [frequency].

For the year ended [date], the performance fee rate, benchmarks and performance fee charged to the respective sub-funds are as follows:

Sub-fund	Benchmark	Performance fee rate	Performance fee [sub-fund CCY]

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date] (continued)

Note 7 - Depositary Bank fees

The depositary bank receives a fee at the end of each [frequency], which is chargeable against the NAV of each sub-fund.

In addition, the depositary bank is entitled to receive a fixed fee for transactions made by each sub-fund.

Note 8 - Transfer agent fees

The Fund pays to the transfer agent a fee of [percentage] per [frequency] of the average NAV of each sub-fund. Such fee is payable [frequency].

Note 9 - Distribution fees

Guidance:

If applicable, refer to the prospectus of the Fund. In many instances, this fee is share class specific. The concerned share classes, together with the applicable level of fee (in % or bps) need to be disclosed.

The share class [share class name] is subject to distribution fees of [percentage]. The distribution fees are payable to the appointed distributors on a [frequency] basis and are calculated on the average NAV of the share class [share class name] of each sub-fund for the relevant [frequency].

Note 10 - Taxation

***Art. 174 and 175
of the Law of
17 December
2010, as
amended***

Under legislation and regulations prevailing in Luxembourg, the Fund is subject to the “taxe d’abonnement” (subscription tax) at the rate of 0.05% per annum, except for the sub-funds and share classes which benefit from a reduced tax rate of 0.01%, like money market sub-funds and the class of shares dedicated to institutional investors.

A sub-fund or share class may be exempted of “taxe d’abonnement” to the extent that: its shares are reserved for institutional, it is investing solely in money market instruments and deposits with credit institutions, and it has obtained the highest possible rating from a recognised rating agency.

The “taxe d’abonnement” is calculated on the basis of the NAV of each sub-fund on the last day of the quarter and payable quarterly to Luxembourg authorities.

Pursuant to Art 175(a) of the amended Law of 17 December 2010, the net assets invested in UCI already subject to the “taxe d’abonnement” are exempt from this tax.

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date] (continued)

Note 11 - Other expenses

Guidance:

A specific note should be inserted only in cases where the statement of operations and changes in NAV does not provide a sufficient level of details and these expenses are significant (i.e. greater than 10% of total expenses).

For the year ended, other expenses consisted of the following:

[Name of the sub-fund]	[CCY]
Publication fees	
Printing fees	
Other expenses	
Total other expenses

Note 12 - Dividend distributions

Guidance:

The illustrative note below must be tailored based on the Fund's distribution policy. The disclosure of dividend rates declared is not required. If it is decided that such level of information needs to be disclosed, PwC recommends to include this detailed information in unaudited supplemental information section of the annual report.

The Fund intends that substantially all the net investment income, if any, of each sub-fund will be declared as a dividend and paid at least annually to the shareholders of the distribution share class of the sub-fund. Net capital and currency gains realised on each sub-fund's investments are expected to be retained by each sub-fund, except in the case of "XX" shares were at the discretion of the Board of Directors of the Fund, the sub-fund may also distribute the sub-fund's capital gains, if any, and capital attributable to such shares.

Dividends distributed by each sub-fund may be paid in cash or reinvested in additional shares of the sub-fund at the net asset value of the shares as of the date on which such dividends are declared.

No distributions are made in respect of the accumulation share classes.

Note 13 - Options

At year-end, the sub-fund [name of the sub-fund] has entered into the following option contracts:

Options traded on a regulated market

CCY	Description	Market	Put/ call	Strike price	Matu- rity	Quantity bought (written)	Commitment* [sub-fund CCY]	Market value [sub-fund CCY]
Total								

*There is no commitment to be disclosed in case of options bought, it only supplies to written options

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 Art 35 and 40

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 Chapter H

[Name of the Fund]
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Notes to the financial statements as at [closing date] (continued)

Note 13 - Options (continued)

OTC options / Swaptions

CCY	Description	Counter-party	Put/call	Strike price	Maturity	Quantity bought (written)	Commitment* [sub-fund CCY]	Market value [sub-fund CCY]
Total								

*There is no commitment to be disclosed in case of options bought, it only supplies to written options

At year-end, the fund received from [name of counterparty] the following collateral:
 [Sub-fund name] : [Type and amount of collateral]

Note 14 - Swap contracts

Guidance:

The disclosure needs to enable the reader to understand the underlying of both legs of the swap, what is paid and what is received. The proposed disclosure needs to be adapted to the specificities of the different swap contracts. A separate schedule should be prepared for each type of swap contract open at year-end.

At year-end, the sub-fund [name of the sub-fund] has entered into the following swap contracts:

14.1 Interest Rate Swaps

Description paying leg / receiving leg [sub-fund CCY]	Payment made by the Fund	Payment received by the Fund	Maturity	Counter-party	Unrealised appreciation/ (depreciation) [sub-fund CCY]
Total					

At year-end, the fund received from [name of counterparty] the following collateral:
 [Sub-fund name] : [Type and amount of collateral]

14.2 Credit Default Swaps

Maturity	Counter-party	Reference obligation (underlying)	Fund receives/ (pays) rate	Protection buyer/ (seller)	CCY	Nominal [sub-fund CCY]	Market value [sub-fund CCY]	Unrealised appreciation/ (depreciation) [sub-fund CCY]
Total								

At year-end, the fund received from [name of counterparty] the following collateral:
 [Sub-fund name] : [Type and amount of collateral]

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date] (continued)

Note 14 - Swap contracts (continued)

14.3 Total Return Swaps

Maturity	Counterparty	Quantitative and qualitative information on underlying basket or reference obligation exposure	Fund receives/ (pays) rate	CCY	Nominal [sub-fund CCY]	Market value [sub-fund CCY]	Unrealised appreciation/ (depreciation) [sub-fund CCY]

At year-end, the fund received from [name of counterparty] the following collateral:
 [Sub-fund name] : [Type and amount of collateral]

14.4 Variance and Volatility Swaps

Denomination	Currency	Maturity	Nominal Value	Counterparty	Unrealised appreciation/ (depreciation) [sub-fund CCY]

At year-end, the fund received from [name of counterparty] the following collateral:
 [Sub-fund name] : [Type and amount of collateral]

Note 15 - Futures contracts

At year-end, the sub-fund [name of the sub-fund] has entered into the following futures contracts:

CCY	Number of contracts bought/(sold)	Security description/ Underlying	Maturity	Notional value / Commitment [sub-fund CCY]	Unrealised appreciation/ (depreciation) [sub-fund CCY]
Total					

At year-end, the fund received from [name of counterparty] the following collateral:
 [Sub-fund name] : [Type and amount of collateral]

Note 16 - Forward foreign exchange contracts

At year-end, the sub-fund [name of the sub-fund] has entered into the following forward foreign exchange contracts:

Settlement date	Counterparty	CCY purchased	Amount bought	CCY sold	Amount sold	Unrealised appreciation/ (depreciation) [sub-fund CCY]
Total						

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date] (continued)

Note 17 - Contracts for difference

At year-end, the sub-fund [name of the sub-fund] has entered into the following contracts for difference:

CCY	Counter-party	Quantity	Description	Market value of underlying securities	Unrealised appreciation / (depreciation)	% of net assets
Total						

At year-end, the fund received from [name of counterparty] the following collateral:
 [Sub-fund name] : [Type and amount of collateral]

Note 18 - Securities lending

Circular CSSF
 08/356

Guidance:

In case of reinvestment of the cash provided as a guarantee/collateral in the context of securities lending transactions, these reinvestments need to be indicated in the annual report.

The name of each counterparty must be disclosed (not only the securities lending agent).

Circulars CSSF
 08/356, CSSF
 13/559, ESMA
 2014/937,
 CSSF 14/592

As at year-end, the market value of the securities on loan open with [name of counterparty] is as follows:

Sub-fund	Total market value of securities on loan [sub-fund CCY]	Amount of collateral received [sub-fund CCY]	Type of Collateral (cash/ bond/shares)
Total			

For the year ended [date] the securities lending income generated by the Fund is as follows:

Sub-fund	Total gross amount of securities lending income [sub-fund CCY]	Direct and indirect costs and fees deducted from gross securities lending income [sub-fund CCY]	Total net amount of securities lending income [sub-fund CCY]
Total			

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Notes to the financial statements as at [closing date] (continued)

Note 19 - Repurchase and reverse repurchase agreements

Repurchase agreements

The table below shows the amounts received as collateral for repurchase agreements by sub-fund:

Sub-fund	Counterparty	Cash paid	Collateral received	Market value of collateral received	% of collateral received

Reverse repurchase agreements

The table below shows the amounts pledged as collateral for reverse repurchase agreements by sub-fund:

Sub-fund	Counterparty	Cash received	Collateral pledged	Market value of collateral pledged	% of collateral pledged

The Fund uses repurchase and reverse repurchase agreements for Efficient Portfolio Management. The revenues and costs arising from them are presented in the statement of operations and changes in net assets under “Interest income on repurchase and interest expense on reverse repurchase agreements”.

Note 20 - Collateral

As at [closing date], the following securities are held with brokers as collateral on derivatives instruments:

Security description	Nominal
Total	

As at [closing date], certain sub-funds received/paid cash collateral from/to counterparty. The sub-funds may reinvest the cash collateral they received.

Sub-fund	CCY	Due from brokers Due to brokers	Type of derivative	Cash collateral balance

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date] (continued)

Note 21 - Statement of changes in portfolio

Upon request to be addressed to the registered office of the Fund/Management Company, a copy of the statement of changes in the portfolio for the year/period ended [closing date] can be obtained free of charge.

Note 22 - Transaction costs

In order to achieve its investment objective, a Fund will incur transactions costs in relation to trading activity on its portfolio. Disclosed in the table below are separately identifiable transaction costs incurred by each sub-fund for the year ended. These include commission costs, settlement fees and broker fees. Not all transaction costs are separately identifiable. For fixed income investments, forward currency contracts and other derivative contracts, transaction costs are included in the purchase and sales price of the investment. Whilst not separately identifiable these transaction costs are captured within the performance of each sub-fund. Market impact costs are not separately identifiable and are therefore also not disclosed in the below table.

Sub-fund	CCY	Transaction costs
[Sub-fund name]	[Sub-fund CCY]	[amount]
[Sub-fund name]	[Sub-fund CCY]	[amount]

Note 23 - Realised gains and losses on investments

Sub-fund	CCY	Realised gain on investments	Realised loss on investments

Note 24 - Change in unrealised appreciation and depreciation on investments

Sub-fund	CCY	Change in unrealised appreciation on investments	Change in unrealised depreciation on investments

Note 25 - Subsequent events

Guidance:

Any important change or development which impacts the activity of the Fund between year-end and the date of finalisation of the annual report, needs to be disclosed.

Schema B–
Annex I of
the Law of 17
December 2010,
as amended
Art 124 Law of
12 July 2013
on Alternative
Investments

Schema B–
Annex I of
the Law of 17
December 2010,
as amended

Art 65 (1) 18°
of the Law 10
August 1915, as
amended

- on [date]: launch of [name of the sub-fund]
- on [date]: [name of the sub-fund] merged with [name of the sub-fund]
- on [date]: [name of the sub-fund] was liquidated

Illustrative annual report SIF/RAIF

*Art 49 (1) and (9)
of the Law of
23 July 2016*

The following illustrative annual report has been prepared for SIFs.

It can be used as the basis for the preparation of a RAIF's annual report, except for the following:

As per the RAIF Law, RAIFs may be constituted with multiple sub-funds, each sub-fund corresponding to a distinct part of the assets and liabilities of the RAIF. However, the RAIF Law does not require the presentation of individual financial statements for each sub-fund. Consequently, a multi-column presentation of the statement of net assets and statement of operations and changes in net assets with one column for each sub-fund and one column relating to the combined figures is generally not appropriate.

Although detailed individual financial statements are not required for each sub-fund, a sufficient level of information per sub-fund should be included in the notes to the financial statements as this information is key for investors.

Further, a separate annual report may be established for each sub-fund provided it contains, in addition to the information on the sub-fund concerned, the collected data of all sub-funds. This cannot replace the statutory accounts prepared on a combined basis.

In case of a RAIF with multiple sub-funds, please refer to page 88 for an example of presentation of financial statements.

Information to be included in the SIF/RAIF annual reports

I. Statement of assets and liabilities detailing:

- transferable securities;
- bank balances;
- other assets;
- total assets;
- liabilities;
- net asset value.

II. Number of shares/units in circulation

III. Net Asset Value (NAV) per share/unit

IV. Qualitative and Quantitative information on Portfolios enabling investor judgement on evolution and return of the activity

V. Statement of the developments concerning the assets of the SIF/RAIF during the reference period including the following:

- income from investments;
- other income;
- management charges;
- depositary's charges;
- other charges and taxes;
- net income;
- distributions and income reinvested;
- increase or decrease of the capital account;
- appreciation or depreciation of investments;
- any other changes affecting the assets and liabilities of the SIF/RAIF.

VI. A comparative table covering the last three financial years and including, for each financial year-end, at the end of the financial year:

- the total net asset value;
- the net asset value per share/unit.

***[Name of the Fund]
[SICAV/FCP]
R.C.S. Luxembourg B[]/R.C.S. K[]***

Audited annual report as at [closing date]

This report does not constitute an offer of shares. No subscription can be received on account of financial reports. Subscriptions are only valid if made on the basis of the current prospectus, supplemented by the latest available annual report of the fund.

[Name of the Fund]
Audited annual report as at [closing date]

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[Name of the Fund]
Audited annual report as at [closing date]

Management and administration of the Fund⁵

Guidance:

This section aims at describing the main players in the supervision/operating activities of the Fund. It needs to be tailored in accordance with the Fund's specific organisation and in line with the latest available prospectus published before year-end.

Registered office of the fund/management company⁶/AIFM

[Name of the Company]

[Address]

Board of Directors

Chairman

[Name of the Chairman]

[Name of the Company]

[Function]

[Address]

Directors

[Name of the Director]

[Name of the Company]

[Function]

[Address]

[Name of the Director]

[Name of the Company]

[Function]

[Address]

Depository bank

[Name of the Depository bank]

[Address]

Domiciliation agent

[Name of the domiciliation agent]

[Address]

Investment manager

[Name of the investment manager]

[Address]

**Administrative agent,
transfer agent and paying agent**

[Name of the administrative agent, transfer
agent and paying agent]

[Address]

Auditor

[Name of the auditor]

[Address]

Management company⁶/AIFM

[Name of the management company/AIFM]

[Address]

⁵. Best practice is to disclose changes made during the year with the relevant effective date.

⁶. All FCPs have a management company/AIFM. For SICAVs, this is possible but not required (e.g. self-managed SICAVs).

[Name of the Fund]
Audited annual report as at [closing date]

Activity report

*Art 68 (2) of
the Law of 19
December 2002,
as amended*

*Art. 52 (4) of
the Law of 13
February 2007 as
amended*

Content

The annual report must include a report on the activities of the past financial year as well as any significant information giving the investor the possibility to judge the activity evolution and the return of the AIF.

For AIFs managed by authorised AIFM please make sure you consider to add in the activity report (or in unaudited section) information about risk and liquidity management, leverage, material changes and remuneration disclosure.

For further details please refer to dedicated appendix 3.

Audit report

The audit report will be provided by the audit team which will be tailored to the specific fund including the applicable reporting framework and auditing standards.

[Name of the Fund]
Audited annual report as at [closing date]

Statement of net assets as at [closing date]

Guidance:

For all statements, captions that are not applicable to the fund's activity should be removed. The aggregation of captions is possible at the discretion of the Board of Directors.

		[Name of sub-fund 1 CCY]	[Name of sub-fund 2 CCY]	Combined [CCY]
	Notes			
Assets				
Investments at market value				
(Cost of investments*)	2.2			
Options bought at market value	2.9-13			
Cash at bank				
Time deposit				
Receivable on investments sold	2.8			
Receivable on subscriptions				
Receivable for repurchase agreements	2.12			
Unrealised appreciation on forward foreign exchange contracts	2.11-16			
Unrealised appreciation on futures contracts	2.10-15			
Unrealised appreciation on contracts for difference	2.13, 17			
Unrealised appreciation on swap contracts/ swap contracts at market value	2.14, 2.15, 2.16, 2.17, 2.18 -14			
Dividends receivable	2.4			
Interest receivable	2.4			
Formation expenses, net of amortisation	2.19			
Other assets/receivables				
Total assets	

*Disclosure of cost of investment is optional (either in the statement of net assets or in the statement of investments)

The accompanying notes form an integral part of these financial statements.

[Name of the Fund]
Audited annual report as at [closing date]

		[Name of sub-fund 1 CCY]	[Name of sub-fund 2 CCY]	Combined [CCY]
	Notes			
Liabilities				
Options written at market value	2.9-13			
Bank overdraft				
Payable on investments purchased	2.8			
Payable on redemptions				
Payable for reverse repurchase agreements	2.12			
Unrealised depreciation on forward foreign exchange contracts	2.11-16			
Unrealised depreciation on futures contracts	2.10-15			
Unrealised depreciation on contracts for difference	2.13, 17			
Unrealised depreciation on swap contracts/ swap contracts at market value	2.14, 2.15, 2.16, 2.17, 2.18 - 14			
Management fees payable	3			
Investment management/advisory fees payable	5			
Depository bank fees payable	7			
Transfer agent fees payable	8			
Administrative agent and domiciliation agent fees payable	4			
Performance fees payable	6			
Subscription tax payable ("taxe d'abonnement")	10			
Dividends payable to shareholders	12			
Other payables/liabilities				
Total liabilities	
Net assets at the end of the year/period	
Number of shares outstanding				
[class X]				
[class Y]				
Net Asset Value per share				
[class X]				
[class Y]				

IRE TN 2019-19

Guidance:

In case of liquidation of a sub-fund, the following must be considered:

- If all the assets and liabilities of the liquidated sub-funds have been settled: there is nothing to disclosed in the statement of net assets.
- If all the assets and liabilities of the liquidated sub-funds have not been settled: material remaining assets and liabilities must be disclosed in the annual report. PwC best practice is to include in a note to the financial statements providing the detail of the remaining assets/liabilities at the closing date.

The accompanying notes form an integral part of these financial statements.

[Name of the Fund]
Audited annual report as at [closing date]

Statement of operations and changes in net assets for the year ended [closing date]

		[Name of sub-fund 1 CCY]	[Name of sub-fund 2 CCY]	Combined [CCY]
	Notes			
Net assets at the beginning of the year/period				
Income				
Dividend income, net of withholding taxes	2.4			
Interest income on bonds, net of withholding taxes	2.4			
Interest income on repurchase agreements	2.12			
Interest income on swap contracts	2.14, 2.15, 2.16, 2.17, 2.18			
Other income				
Total income	
Expenses				
Management fees	3			
Investment management/advisory fees	5			
Performance fees	6			
Depository bank fees	7			
Transfer agent fees	8			
Administrative agent and domiciliation agent fees	4			
Distribution fees	9			
Professional fees				
Subscription tax ("taxe d'abonnement")	10			
Amortisation of formation expenses	2.19			
Bank and interest expense				
Interest expense on reverse repurchase agreements	2.12			
Interest expense on swap contracts	2.14, 2.15, 2.16, 2.17, 2.18			
Other expenses ⁷	11			
Total expenses	
Net investment income/(loss)	

The accompanying notes form an integral part of these financial statements.

⁷ When other expenses > 10% total expenses – Best practice is to add a note detailing this caption (cfr illustrative of notes)

[Name of the Fund]
Audited annual report as at [closing date]

		[Name of sub-fund 1 CCY]	[Name of sub-fund 2 CCY]	Combined [CCY]
	Notes			
Net investment income/(loss)	
(carried forward from previous page)				
Net realised gains/(losses)				
- on investments	2.7			
- on options	2.9			
- on forward foreign exchange contracts	2.11			
- on futures contracts	2.10			
- on contracts for difference	2.13			
- on swap contracts	2.14, 2.15, 2.16, 2.17, 2.18			
- on foreign currency	2.5			
Net realised gains/(losses) for the year/period	
Change in net unrealised appreciation/ depreciation				
- on investments				
- on options	2.9			
- on forward foreign exchange contracts	2.11			
- on futures contracts	2.10			
- on contracts for difference	2.13			
- on swap contracts	2.14, 2.15, 2.16, 2.17, 2.18			
Change in net unrealised appreciation/depreciation for the year/period	
Result of operations for the year/period	
Subscriptions				
Redemptions				
Dividends paid	12			
Exchange difference				
Net assets at the end of the year/period	

IRE-TN2019-19

Guidance:
 In case of liquidation, sub-fund's profit and loss activity of the period must be disclosed.

The accompanying notes form an integral part of these financial statements.

[Name of the Fund]
Audited annual report as at [closing date]

Statistical information

Guidance:

All share classes need to be indicated. In case some share classes are not active at year-end, they still need to be disclosed in the historical data for the year when they were active (N-1 to N-2).

	Year-end [N] [CCY]	Year-end [N-1] [CCY]	Year-end [N-2] [CCY]
Total net assets			
[Name of sub-fund]			
Total net assets			
Number of shares outstanding			
[class X]*			
[class Y]			
NAV per share			
[class X]*			
[class Y]			

* In case of a share class liquidation/merger during the year, best practice is to indicate the latest available information (NAV/share, number of shares outstanding and date of liquidation/merger).

In case of the financial statements of certain sub-funds have been prepared on a non-going concern basis (Refer to Note 2.1), to enable the investors to reconcile the NAV disclosed in the audited financial statements ("audited NAV") with the NAV published at financial year-end, it is best practice to disclose both the audited NAV and the NAV published in the statistical section of the annual report (total NAV and NAV per share over the last three financial years), with a note to the financial statements explaining the origin of the difference (refer to example in included in Note 2.1).

[Name of the Fund]
Audited annual report as at [closing date]

[Name of the sub-fund] Statement of investments as at [closing date] (expressed in [CCY])

Annex of the
Law of 13
February 2007, as
amended

Guidance:
The Law of 13 February 2007, as amended requires qualitative and quantitative information on portfolios enabling investors' judgment on evolution and return of the activity.
Information can be presented either in the statement of investments, in the geographical classification, in the economical classification or in the Top 10 holdings.

Nominal/quantity	Description	Security currency	Market value [CCY]	Market value as a percentage of net assets %
Shares				
	Total shares			
Bonds				
	Total bonds			
Warrants/rights				
	Total warrants/rights			
Total investments		

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date]

Note 1 - General information

For a FCP - specific disclosure

[Name of the FCP] (the Fund) is an open-ended investment fund and has been created on [date] as a FCP ("Fonds Commun de Placement"). The Fund is governed by the provisions of the Law of 13 February 2007, as amended or the Law of 23 July 2016.

The Fund is an unincorporated co-proprietorship of its securities and other assets, managed by [management company name] (the "Management Company"). The assets of the Fund are segregated from those of the Management Company.

For a SICAV

[Name of the SICAV] (the Fund) is an open-ended investment fund and has been incorporated on [date] under Luxembourg laws as a "Société d'Investissement à Capital Variable" for an unlimited period of time. The Fund is governed by the provisions of the Law of 13 February 2007, as amended or the Law of 23 July 2016.

The Fund comprises various sub-funds, each relating to a separate investment portfolio of securities, cash and other assets. Separate classes of shares are issued in relation to the sub-funds.

The Board of Directors of the Fund may authorise the creation of additional sub-funds/share classes in the future.

The Fund has appointed [name of Alternative Investment Fund Manager] as AIFM within the meaning of the AIFM Law of 12 July 2013, in accordance with the terms and conditions of the AIFM Services Agreement, effective as from 22 July 2014. In this respect, the AIFM is responsible for investment management services, administration, including valuation of the assets of the Fund, registrar and transfer agency services, marketing, domiciliation and activities related to the assets of the Fund. The AIFM is further responsible for the management of conflict of interest and the control of the well-informed status of the investors or Shareholders.

As at [closing date], the following [number] sub-funds are active:

- [name of the sub-fund]
- [name of the sub-fund]
- ...

Guidance:

PwC best practice: The list of all share classes available for subscription and their specific features (distribution, capitalisation, fee level, etc.) should be disclosed. The information should be similar to the description in the Fund's prospectus.

During the year, the following changes were made:

1) Launch of sub-fund(s):

On [date], [name of the sub-fund] has been launched

2) Change in name of sub-fund(s):

On [date], [name of the sub-fund] became [new name of the sub-fund]

3) Merger(s): (indicate share exchange ratio)

On [date], [name of the sub-fund] merged with [name of the sub-fund]

4) Liquidation of sub-fund(s):

On [date], [name of the sub-fund] has been liquidated

In each sub-fund, the Fund may issue shares in the following categories, which differ mainly in respect of fees, commissions and distribution policy:

- [class X: insert specificity]
- [class Y: insert specificity]

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date] (continued)

Note 2 - Significant accounting policies

2.1 Presentation of the financial statements

Guidance:

Financial statements under Luxembourg GAAP are prepared on a going concern basis of accounting, unless management either intends to liquidate the entity or to cease operations, or has no realistic alternative but to do so.

Non-going concern basis of accounting should be used for the preparation of the financial statements, in the following circumstances:

- 1) The decision to liquidate the fund or close a sub-fund is taken by the Board of Directors of the fund or by the Board of Directors of the Management Company in the case of a voluntary liquidation/closure or is taken by the Court in the context of a compulsory liquidation. This decision can occur prior to the fund/sub-fund year-end or after the fund/sub-fund year-end.
- 2) The Board of Directors of the fund or the Board of Directors of the Management Company intend to liquidate the fund or close a sub-fund within period covered by their assessment (at the 12 months following the date of the financial statements).

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The financial statements are prepared in accordance with Luxembourg legal and regulatory requirements relating to investment funds under the going concern basis of accounting [except for the sub-funds [name the sub-funds impacted]]. As indicated in Note 1 and Note 23, these sub-funds were put in liquidation during the year/period ended or are expected to be liquidated within XX months following [closing date]. As such, the financial statements for these sub-funds have been prepared on a non-going concern basis.

Non-going concern basis of accounting

For the sub-funds for which the financial statements have been prepared on a non-going concern basis, the following accounting policies differ from those described in the notes 2.2 through 2.19:

- Expected liquidation expenses have been accrued for;
- Any remaining formation expenses have been fully expensed;
- The valuation of the sub-funds' investments is based on their net realisable value;

As a result of the application of above accounting policies, the net asset value of these sub-funds differs from their published net assets value as of the closing date as follows:

Sub-fund name	Currency
Published NAV	XX
Liquidation expenses	(XX)
Valuation adjustments	XX
Formation expenses	(XX)
NAV on a non-going concern basis	XX

Guidance:

Alternatively, when the application of the non-going concern basis of accounting does not lead to material differences, a statement to that effect can be included instead of the above table. 'The application of the non-going concern basis of accounting has not led to material adjustments to the sub-funds' published net asset value'.

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date] (continued)

Note 2 - Significant accounting policies (continued)

2.2 Valuation of investments in securities

a) Securities valuation policy

Guidance:

Each investment fund may have specific valuation rules. The disclosure below needs to be amended to include the valuation principles specific to the Fund (described in the prospectus), and the type of investments the Fund is exposed to. The note should cover any type of investments present at year-end, as well as those that had been held during the financial year, which had a significant impact on the Fund's performance.

Where fair valuation process is used, additional information on the methodology applied should be disclosed including key inputs and assumptions.

Art 9 Law of 13 February 2007, as amended and Art 11 Law of 23 July 2016

Securities listed on a recognised stock exchange or dealt in on any other regulated market that operates regularly, is recognised and is open to the public, are valued at their latest available closing prices, or, in the event that there should be several such markets, on the basis of their latest available closing prices on the main market for the relevant security. Certain investments of the Fund may, depending upon market conditions, be traded in relatively thin markets and/or in markets that experience significant volatility. As a result of these conditions, the prices used to value securities may differ from the value that would be realised if these securities were sold, and the differences could be material.

In the event that the latest available closing price does not, in the opinion of the Board of Directors, reflect the fair market value of the relevant securities, the value of such securities is defined by the Board of Directors based on the reasonably foreseeable sale proceeds determined prudently and in good faith. Securities not listed or traded on a stock exchange or not dealt in on another regulated market are valued based on the basis of the probable sale proceeds determined prudently and in good faith by the Board of Directors of the Fund.

Short-term investments of sufficient credit quality maturing in less than 61 days are valued at amortised cost, which approximates fair market value. In the event of material changes in market conditions, the valuation basis of the investment is adjusted to market yield. Investments in open-ended UCIs are valued on the basis of the last available NAV of the units or shares of such UCIs.

b) Fair valued securities

Guidance:

When fair value is applied to value all or part of the assets of the Fund, the notes to the financial statements should enable the reader to understand the valuation process implemented by the Board of Directors and its main components. Such disclosure should cover for example:

- the kind of assets covered;
- the frequency of the fair value review;
- key parameters used to assess fair value;
- the person/groups involved in the monitoring of this fair value process;
- any other relevant information.

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date] (continued)

Note 2 - Significant accounting policies (continued)

During difficult market conditions (e.g. no liquidity, lack of information on trades, etc.), prices obtained for certain investments from different sources may not be representative of fair value. As a result, the Board of Directors of the Fund has implemented fair value techniques to estimate the fair value of these investments as at [date]. The fair value techniques implemented consist of [description of the fair value methodology and key inputs and assumptions used]. Because of the inherent uncertainty in the fair value process, these estimated values may significantly differ from those that would have been used had a market for the securities existed, and from the values that may be ultimately recovered.

The sub-funds with fair valued securities as at year-end are as follows:

Sub-fund	Currency	Market value of fair valued securities	% Net Assets

c) Derivative instruments valuation policy

A derivative is an instrument whose value is derived from an underlying instrument, index reference rate or a combination of these factors. Derivative instruments may be privately negotiated contracts, which are often referred to as over the counter ("OTC") derivatives or they may be listed and traded on an exchange.

Derivative instruments are stated at fair value and recognised as assets and liabilities in the statement of net assets. Gains and losses resulting from the change in the market value are reflected in the statement of operations as a component of change in unrealised gain/(loss). Realised gains or losses are recorded on termination or from periodic cash flow payments.

Futures contracts: The market value of futures contracts is based on exchange settlement/last sale prices, last bid or ask process on the exchange, or independent market quotes.

Options: The market value of an OTC option is determined by using counterparty supplied valuations, an independent pricing service or valuation models which use market data inputs supplied by a third party pricing service. The market value of an exchange traded option is based on the exchange settlement/last sale prices, last bid or ask prices on the exchange, or independent market quotes provided by a pricing service or counterparty.

Forward foreign exchange contracts: The market value of these contracts is based on the forward exchange rate of the underlying currency on the valuation day.

Swaps: The cash flows received and paid in connection with swap contracts are converted to present value on the valuation date corresponding to the maturity of these cash flows. The value of the swap contracts is the difference between these two present value conversions. The market value is obtained from third party pricing agents, market makers or internal models.

Contracts for difference (CFD): The market value of CFDs is determined by the last known traded price on the exchange on which the underlying securities or assets are traded or admitted for trading. For underlying securities traded on markets closing after the time of the valuation, last known prices as of this time or such other time may be used.

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date] (continued)

Note 2 - Significant accounting policies (continued)

d) Additional information – Published NAV vs NAV as of closing date

Guidance:

The annual report is presumed to be prepared using closing prices as of the last business day in the reporting period. When the NAV computed for trading purposes is not based on closing price (use of previous day closing price or intraday pricing), the financial statements should be based on a NAV calculated for financial reporting purposes as of the closing date and a reconciliation between the published NAV and the NAV established for financial reporting purposes should be included in the notes to the financial statements. In practice, when the activity between the two NAVs is material but not pervasive, a note to the financial statements can be added to provide the description of the material differences. When the activity between the two NAVs is pervasive, the financial statements should be updated to reflect the activity including the valuation as of the closing date.

If the NAV had been calculated using closing prices as at [closing date], the NAV of the following sub-funds would have significantly been increased / (decreased) as follows:

Sub-fund name	Variation (%)

The NAV of the other sub-funds would not have been significantly different.

2.3 Combined financial statements

Guidance:

This note is not applicable in case of stand-alone structures (i.e. no sub-fund).

IML
Circular 91/75
Chapter L

The accounts of the Fund are expressed in [CCY] and the accounts of the sub-funds are kept in the currency of each sub-fund. The combined statement of net assets and the combined statement of operations and changes in net assets are the sum of the statement of net assets, the statement of operations and changes in net assets of each sub-fund converted into the currency of the Fund using exchange rates prevailing at year-end. [All cross sub-fund investment related amounts have been eliminated from the calculation of the combined figures].

Guidance:

The combined statement of operations and changes in net assets could also be converted using the average exchange rate of the year then ended. In such a case, a caption "exchange difference" should be inserted in this statement.

Art 71 (8) Law of
13 February 2007,
as amended and
Art 49 (7) Law 23
July 2016

Cross sub-fund investments

At [closing date], the total cross sub-fund investment amounted to [CCY] and therefore the total combined Net Assets at year-end without cross sub-fund investments would amount to [CCY].

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date] (continued)

Note 2 - Significant accounting policies (continued)

Art. 38 (4)
Art 49 (1) and
49 (9) of the Law
23 July 2016

Guidance:

The RAIF Law does not require the presentation of individual financial statements for each sub-fund. However, the annual report must include any significant information enabling investors to make an informed judgment on the development of the activities and of the results of the RAIF. Consequently, although detailed financial statements for each sub-fund are not required in the annual report of RAIFs, a sufficient level of information per sub-fund should be included in notes to the financial statements or in the annual report of each of the umbrella RAIFs.

2.4 Dividend and interest income

Dividends are shown net of withholding tax deducted at source and are recorded as income on the ex-dividend date. Interest income is accrued on a daily basis over the life of the investment.

2.5 Foreign currency translation

The reference currency of the Fund is [CCY] and the combined statements are expressed in that currency. The books and records of each sub-fund are denominated in the reference currency of the corresponding sub-fund.

The acquisition cost of securities expressed in a currency other than the reference currency of the respective sub-funds is translated at the exchange rates prevailing on the date of purchase.

Income and expenses expressed in currencies other than the reference currency of the respective sub-funds are converted at exchange rates ruling at the transaction date.

Assets and liabilities expressed in currencies other than the reference currency of the respective sub-funds are converted at exchange rates prevailing at year-end.

Reported realised foreign currency gains or losses arise from the disposition of foreign currency, purchase of foreign currency in certain countries (e.g. Brazil) that impose a tax on such purchases, currency gains or losses realised between the trade and settlement dates on securities transactions, and the difference between the amounts of dividends, interest and foreign withholding taxes recorded on each sub-fund's books on the transaction date and the [CCY] equivalent of the amounts actually received or paid.

Unrealised foreign exchange gains and losses arise from changes (due to the changes in the exchange rate) in the value of foreign currency and other assets and liabilities denominated in foreign currencies, which are held at year end. The realised or change in unrealised gains and losses on foreign exchange are recognised in the statement of operations and changes in net assets.

Here are the principal exchange rates applied at year-end:

1 [CCY] = CHF [amount]
EUR [amount]
GBP [amount]
SEK [amount]
USD [amount]

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date] (continued)

Note 2 - Significant accounting policies (continued)

2.6 Swing pricing/dilution levy

Guidance:

The application of swing pricing/dilution levy is only possible when it is specifically prescribed in the Fund's prospectus. In most cases, the swing price adjustment can be done through the application of a specific swing factor as described hereunder or the use of bid or ask prices to value the sub-fund portfolio. The note should be adapted based on the swing pricing methodology described in the Fund's prospectus.

A sub-fund may suffer dilution of the net asset value per share due to investors buying or selling shares in a sub-fund at a price that does not reflect dealing and other costs that arise when security trades are undertaken by the Investment Manager to accommodate cash inflows or outflows.

In order to counter this impact, a swing pricing mechanism has been adopted to protect the interests of shareholders of the sub-fund. If on any valuation date, the aggregate net capital activity of a sub-fund exceeds a pre-determined threshold, as determined and reviewed for each sub-fund on a periodic basis by the Board of Directors of the Fund, the net asset value per share will be adjusted upwards or downwards to reflect costs associated with net capital inflows or net capital outflows respectively.

The swing pricing mechanism may be applied across all sub-funds. The extent of the price adjustment is set by the Board of Directors to reflect dealing and other costs. The amount of the adjustment may vary from sub-fund to sub-fund and will not exceed [percentage]% of the original net asset value per share.

The table below discloses the sub-funds that are in scope of the swing price mechanism during the year/period.

For the sub-funds that applied swing price adjustments at the end of the year/period the NAV per share/unit in each sub-fund's reference currency before swing price adjustment (the "un-swung NAV per share") and the NAV per share/unit in each sub-fund's reference currency after swing price adjustment (the "swung NAV per share") are disclosed.

Sub-fund	Share class/ Unit class	Currency	Un-swung NAV per share/unit	Swung NAV per share/unit
ABC	Dis 1	USD	XXX	XXX
XYZ	Cap 2	EUR	No swing price adjustment at year/period end	

2.7 Realised gains and losses on sales of investments in securities

Guidance:

Realised gains and losses on the sales of investments in securities are usually determined on the average cost basis. Other principles such as FIFO are also acceptable. The accounting policy should however be applied consistently to compute realised gains/losses from one financial year to another. Netting can be disclosed in the statement of operations and changes in net assets however AIFMD requires that gains and losses are disclosed on a gross basis. Hence, we would advise to choose to split gains and losses either in the statement of operations and changes in net assets or in the notes to insure compliance with AIFMD related disclosure. Same restrictions of disclosure apply for the change in unrealised gains and losses on investments.

Investments in securities are accounted for on a trade date basis. Realised gains and losses on sales of investments in securities are calculated on the average cost basis [and include transaction costs] [to delete if presented separately in the statement of operations and change in net assets].

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date] (continued)

Note 2 - Significant accounting policies (continued)

2.8 Mortgage related securities – To Be Announced securities (TBAs)

Guidance:

TBAs can be disclosed separately on the statement of net assets and be excluded from the statement of investments. In this case, the market value of TBAs is included in the statement of net assets under the heading “Investment in TBAs at market value”.

The realised gains/(losses) and change in unrealised appreciation/depreciation on TBAs are disclosed in the statement of operations and changes in net assets respectively under the headings “Net realised gains/(losses) on TBAs” and “Change in net unrealised appreciation/depreciation on TBAs”.

A table including security description, currency, nominal value, market value and unrealised gains/(losses) should be inserted in notes to the financial statements.

TBA positions refer to the common trading practice in the mortgage backed securities market in which a security is to be bought from a mortgage pool (e.g. Ginnie Mae, Fannie Mae or Freddie Mac) for a fixed price at a future date. At the time of purchase the exact security is not known, but the main characteristics of it are specified. Although the price has been established at the time of purchase, the principal value has not been finalised.

TBA positions are disclosed in the statement of investments. The purchase of this type of security has not been settled and consequently, the amount corresponding to the payable due when the transaction is settled, is disclosed under “Payable on investments purchased” in the statement of net assets.

Negative positions in the statement of investments reflect the Fund’s sale commitments of TBAs. The amount corresponding to the receivable due when the transaction is settled, is disclosed under “Receivable on investments sold” in the statement of net assets.

The realised gains/(losses) on TBAs and changes in unrealised appreciation/depreciation are disclosed in the statement of operations and changes in net assets respectively under the headings “Net realised gains/ (losses) on investments” and “Change in net unrealised appreciation/depreciation on investments”.

2.9 Options

A purchaser of a put option has the right, but not the obligation, to sell the underlying instrument at an agreed upon price (“strike price”) to the option seller. A purchaser of a call option has the right, but not the obligation, to purchase the underlying instrument at the strike price from the option seller.

Purchased Options — Premiums paid by the Fund for purchased options are included in the statement of net assets as an investment. The option is adjusted daily to reflect the current market value of the option and the change is recorded as unrealised appreciation or depreciation. If the option is allowed to expire, the Fund will lose the entire premium it paid and record a realised loss for the premium amount. Premiums paid for purchased options which are exercised or closed are added to the amounts paid or offset against the proceeds on the underlying investment transaction to determine the realised gain/loss or cost basis of the security.

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date] (continued)

Note 2 - Significant accounting policies (continued)

Written Options — Premiums received by the Fund for written options are included in the statement of net assets. The amount of the liability is adjusted daily to reflect the current market value of the written option and the change in market value is recorded as unrealised appreciation or depreciation. Premiums received from written options that expire are treated as realised gains. The Fund records a realised gain or loss on written options based on whether the cost of the closing transaction exceeds the premium received. If a call option is exercised by the option buyer, the premium received by the Fund is added to the proceeds from the sale of the underlying security to the option buyer and compared to the cost of the closing transaction to determine whether there has been a realised gain or loss. If a put option is exercised by an option buyer, the premium received by the option seller reduces the cost basis of the purchased security.

Written uncovered call options subject the Fund to unlimited risk of loss. Written covered call options limit the upside potential of a security above the strike price. Written put options subject the Fund to risk of loss if the value of the security declines below the exercise price minus the put premium.

The Fund is not subject to credit risk on written options as the counterparty has already performed its obligation by paying the premium at the inception of the contract.

2.10 Futures contracts

Futures contracts provide for the delayed delivery of the underlying instrument at a fixed price or for a cash amount based on the change in the value of the underlying instrument at a specific date in the future. Upon entering into a futures contract, the Fund is required to deposit with the broker, cash or securities in an amount equal to a certain percentage of the contract amount which is referred to as the initial margin account. Subsequent payments, referred to as variation margin, are made or received by the Fund periodically and are based on changes in the market value of open futures contracts.

Securities deposited as initial margin are designated in the statement of investments and cash deposited is recorded in the statement of net assets. A receivable and/or a payable to brokers for the daily variation margin is also recorded in the statement of net assets under due to/due from brokers.

2.11 Forward foreign exchange contracts

Forward foreign exchange contracts represent obligations to purchase or sell foreign currency on a specified future date at a price fixed at the time the contracts are entered into. Non-deliverable forward foreign exchange contracts are settled with the counterparty in cash without the delivery of foreign currency. Changes in the value of these contracts are recorded as unrealised appreciation or depreciation until the contract settlement date. When the forward foreign exchange contract is closed, the Fund records a realised gain or loss equal to the difference between the value at the time the contract was opened and the value at the time it was closed.

2.12 Securities lending, repurchase and reverse repurchase agreements

a) Securities lending

The Fund may lend securities included in its portfolio to a borrower. To guarantee this transaction, the Fund receives collateral. Securities on loan are delivered to a third party broker, the assets lent continue to be valued as part of the portfolio of the Fund. Upon termination of a loan, the Fund is required to return to the borrower the posted collateral. Loans are subject to termination by the Fund or the borrower at any time.

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date] (continued)

Note 2 - Significant accounting policies (continued)

Securities lending generates additional income for the Fund according to the contracts. This remuneration is accounted for in the statement of operations and changes in net assets under "Other income".

b) Repurchase and reverse repurchase agreements

A repurchase agreement ("repo") is the sale of a security with a commitment by the seller to buy the same security back from the purchaser at a specified price at a designated future date.

A reverse repurchase agreement ("reverse repo") is the purchase of a security with a commitment by the buyer to sale the same security back to the seller at a specified price at a designated future date.

By convention, whether the transaction is called a repo, or a reverse repo agreement is determined by viewing the transaction from the perspective of the dealer (i.e. the fund counterparty).

A repurchase agreement is similar in effect to a loan by the Fund to the seller collateralised by the securities. The Fund does not record the purchase of the securities received but records the repurchase agreement as if it were a loan. The transaction is disclosed in the statement of net assets under "Receivable for repurchase agreements", including any interest receivable on such transaction. Because a repurchase agreement between the two specific parties involved is generally for a relatively short time and is not transferable, it has no active market. The Fund carries repurchase agreements at cost, which, combined with accrued interest, approximates market value.

The interest income is recorded in the statement of operations and changes in net assets under "Interest income on repurchase agreements".

Under a reverse repo agreement, the Fund sells a security to a buyer, usually a broker, for cash. The Fund does not record a sale of the security and agrees to repay cash plus interest at a later date in exchange for the return (repurchase) of the same security. The transaction is thus similar in effect to borrowing by the Fund collateralised by the securities. The proceeds are recorded in the statement of net assets under "Payable for reverse repurchase agreements", including any interest payable on such transaction. The securities are marked to market. The interest expense is recorded in the statement of operations and changes in net assets under "Interest expense on reverse repurchase agreements".

2.13 Contracts for difference

Contracts for difference are contracts entered into between a broker and the Fund under which the parties agree to make payments to each other so as to replicate the economic consequences of holding a long or short position in the underlying security. Contracts for difference also mirror any corporate actions that take place.

Upon entering into contracts for difference, the Fund may be required to pledge to the broker an amount of cash and/or other assets equal to a certain percentage of the contract amount ("initial margin"). Subsequently, payments known as "variation margin" are made or received by the Fund periodically, depending on fluctuations in the value of the underlying security.

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date] (continued)

Note 2 - Significant accounting policies (continued)

2.14 Interest Rate Swaps and Cross Currency Swaps

An interest rate swap is a bilateral agreement in which each party agrees to exchange a series of interest payments for another series of interest payments (usually fixed/floating) based on a notional amount that serves as a computation basis which is usually not exchanged. A cross-currency swap is a bilateral agreement in which each party agrees to exchange two different currencies with an agreement to reverse the exchange at a later date at the same exchange rates. During the life of the swap, each party pays interest (in the currency of the principal received) to the other.

2.15 Credit Default Swaps

A credit default swap is a credit derivative transaction in which two parties enter into an agreement, whereby one party (the protection buyer) pays the other (the protection seller) a fixed periodic coupon for the specified life of the agreement in return for a payment contingent on a credit event related to the underlying reference obligation.

If a credit event occurs, the protection seller would be obligated to make a payment, which may be either: (i) a net cash settlement equal to the notional amount of the swap less the auction value of the reference obligation or (ii) the notional amount of the swap in exchange for the delivery of the reference obligation. Selling protection effectively adds leverage to a Fund's portfolio up to the notional amount of swap agreements. The notional amount represents the maximum potential liability under a contract and is not reflected in the statement of net assets. Potential liabilities under these contracts may be reduced by: the auction rates of the underlying reference obligations; upfront payments received at the inception of a swap; and net amounts received from credit default swaps purchased with the identical reference obligation.

2.16 Total Return Swaps

A total return swap is a bilateral agreement in which each party agrees to exchange payments based on the performance of an underlying instrument represented by a security, commodity, basket or index thereof for a fixed or variable rate. One party pays out the total return of a specific reference asset, and in return, receives a regular stream of payments. The total performance will include gains and losses on the underlying, as well as any interest or dividends during the contract period according to the type of underlying. The cash flows to be exchanged are calculated by reference to an agreed upon notional amount or quantity. To the extent the total return of the reference asset underlying the transaction exceeds or falls short of the offsetting payment, the Fund will receive a payment from or make a payment to the counterparty.

2.17 Variance and Volatility Swaps

A variance swap is a bilateral agreement in which each party agrees to exchange cash flows based on the measured variance (or volatility for volatility swaps) of a specified underlying asset. One party agrees to exchange a "fixed rate" or strike price payment for the "floating rate" or realised price variance on the underlying asset with respect to the notional amount. At the maturity date, a net cash flow is exchanged, where the payoff amount is equivalent to the difference between the realised price variance of the underlying asset and the strike price multiplied by the notional amount.

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date] (continued)

Note 2 - Significant accounting policies (continued)

2.18 Other swap contracts

Guidance:

Many swap contract types exist. Here is an indicative list of such contracts:

- equity swaps;
- asset swaps;
- correlation swaps;
- constant maturity swaps;
- inflation swaps.

The following note is a generic description applicable to swap contracts, describing how they work and how they are accounted for. This description has to be adapted to the specific swap contracts present in the Fund and their valuation/accounting rules.

The Fund may enter into swap contracts in which the Fund and the counterparty agree to exchange payments over time, according to a predetermined rule applying to both of them.

2.19 Formation expenses

Guidance:

Formation expenses should be amortised by using the method described in the Fund's Prospectus.

Formation expenses are amortised on a straight-line basis over a period of five years.

Note 3 - Management fees

Guidance:

This note needs to be tailored based on the actual fee structure of the Fund and the payment frequency. Best practice is to present the effective management fee rate applied during the year and not only a maximum amount.

In case the Fund is subject to an all-in-fee, the nature of the services covered needs to be described. In such situation, notes related to other fees need to be adapted. Any change in the fee structure during the year should also be indicated.

The Management Company is entitled to a fee payable at the end of [frequency] and calculated on the average NAV of each sub-fund during the [frequency].

[Name of the sub-fund]:	[name of the share class]:	[Management fee rate] %
	[name of the share class]:	[Management fee rate] %
[name of the share class]:	[name of the share class]:	[Management fee rate] %
	[name of the share class]:	[Management fee rate] %

*Art. 53 Law of 10
August 1915, as
amended*

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date] (continued)

Note 4 - Administrative and domiciliary agent fees

The administrative and domiciliary agent is entitled to receive fees and commissions for its services rendered to the Fund, corresponding to [percentage] per annum of the average NAV of each sub-fund. Such fees are payable [frequency].

Note 5 - Investment management/advisory fees

The Fund pays to the investment manager/advisor a fee of [percentage] per annum of the average NAV of each sub-fund. Such fee is payable [frequency].

Note 6 - Performance fees

Comment:

The disclosure of performance fees model should be described in sufficient detail to enable the reader to understand the basis of calculation and its main components. The description is usually a “copy and paste” of the wording used in the prospectus of the Fund. Any change during the year should also be indicated.

The investment manager/adviser is entitled to receive a performance fee in addition to the investment/ advisory management fee.

Pursuant to the investment management agreement, the investment manager is entitled to receive from the net assets of certain sub-funds or classes of shares, an annual performance-based incentive fee equal to the given percentage of the share class return in excess of the benchmark return and the high-water mark where applicable. On each valuation day, an accrual for the previous valuation day’s performance fee is made, when appropriate, and the final performance fee is payable [frequency].

For the year ended [date], the performance fee rate, benchmarks and performance fee charged to the respective sub-funds are as follows:

Sub-fund	Benchmark	Performance fee rate	Performance fee [Sub-fund CCY]

Note 7 - Depositary Bank fees

The depositary bank receives a fee at the end of each [frequency], which is chargeable against the NAV of each sub-fund.

In addition, the depositary bank is entitled to receive a fixed fee for transactions made by each sub-fund.

Note 8 - Transfer agent fees

The Fund pays to the transfer agent a fee of [percentage] per [frequency] of the average NAV of each sub-fund. Such fee is payable [frequency].

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date] (continued)

Note 9 - Distribution fees

Guidance:

If applicable, refer to the prospectus of the Fund. In many instances, this fee is share class specific. The concerned share classes, together with the applicable level of fee (in % or bps) need to be disclosed.

The share class [share class name] is subject to distribution fees of [percentage]. The distribution fees are payable to the appointed distributors on a [frequency] basis and are calculated on the average NAV of the share class [share class name] of each sub-fund for the relevant [frequency].

Note 10 - Taxation

Under legislation and regulations prevailing in Luxembourg, the Fund is subject to the “taxe d’abonnement” (subscription tax) at the rate of 0.01% per annum.

A sub-fund or share class may be exempted of “taxe d’abonnement” to the extent that: its shares are reserved for institutional, it is investing solely in money market instruments and deposits with credit institutions, and it has obtained the highest possible rating from a recognised rating agency.

The “taxe d’abonnement” is calculated on the basis of the NAV of each sub-fund on the last day of the quarter and payable quarterly to Luxembourg authorities.

Note 11 - Other expenses

Guidance:

A specific note should be inserted only in cases where the statement of operations and changes in NAV does not provide a sufficient level of details and these expenses are significant (ie greater than 10% of total expenses).

[Name of the sub-fund]	[CCY]
Publication fees	
Printing fees	
Other expenses	
Total other expenses

Note 12 - Dividend distributions

Guidance:

The illustrative note below must be tailored based on the Fund’s distribution policy. The disclosure of dividend rates declared is not required. If it is decided that such level of information needs to be disclosed, PwC recommends to include this detailed information in unaudited supplemental information section of the annual report.

The Fund intends that substantially all the net investment income, if any, of each sub-fund will be declared as a dividend and paid at least annually to the shareholders of the distribution share class of the sub-fund. Net capital and currency gains realised on each sub-fund’s investments are expected to be retained by each sub-fund, except in the case of “XX” shares were at the discretion of the Board of Directors of the Fund, the sub-fund may also distribute the sub-fund’s capital gains, if any, and capital attributable to such shares.

Art 68 (2) of
the Law of 13
February 2007, as
amended
Art 46 (2) of the
Law of 23 July
2016

[Name of the Fund]
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Notes to the financial statements as at [closing date] (continued)

Note 12 - Dividend distributions (continued)

Dividends distributed by each sub-fund may be paid in cash or reinvested in additional shares of the sub-fund at the net asset value of the shares as of the date on which such dividends are declared.

No distributions are made in respect of the accumulation share classes.

Note 13 – Options

At year-end, the sub-fund [name of the sub-fund] has entered into the following option contracts:

Options traded on a regulated market

CCY	Description	Market	Put/call	Strike price	Maturity	Quantity bought (written)	Market value [sub-fund CCY]
Total							

OTC options / Swaptions

CCY	Description	Counter-party	Put/call	Strike price	Maturity	Quantity bought (written)	Market value [sub-fund CCY]
Total							

At year-end, the fund received from [name of counterparty] the following collateral:
[Sub-fund name]: [Type and amount of collateral]

Please note that above suggested disclosure is the best practice UCITS like disclosure. It is not mandatory as per SIF or RAIF Law to provide full disclosure, only qualitative and quantitative information enabling investors judgment on evolution and return of the activity.

Note 14 - Swap contracts

Guidance:

The disclosure needs to enable the reader to understand the underlying of both legs of the swap, what is paid and what is received. The proposed disclosure needs to be adapted to the specificities of the different swap contracts. A separate schedule should be prepared for each type of swap contract open at year-end.

At year-end, the sub-fund [name of the sub-fund] has entered into the following swap contracts:

14.1 Interest Rate Swaps

Description paying leg / receiving leg [sub-fund CCY]	Payment made by the Fund	Payment received by the Fund	Maturity	Counter-party	Unrealised appreciation/ (depreciation) [sub-fund CCY]
Total					

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date] (continued)

Note 14 - Swap contracts (continued)

At year-end, the fund received from [name of counterparty] the following collateral:
 [Sub-fund name]: [Type and amount of collateral]

14.2 Credit Default Swaps

Maturity	Counterparty	Reference obligation (underlying)	Fund receives/ (pays) rate	Protection buyer/ (seller)	CCY	Nominal [sub-fund CCY]	Market value [sub-fund CCY]	Unrealised appreciation/ (depreciation) [sub-fund CCY]
Total								

At year-end, the fund received from [name of counterparty] the following collateral:
 [Sub-fund name]: [Type and amount of collateral]

14.3 Total Return Swaps

Maturity	Counterparty	Quantitative and qualitative information on underlying reference obligation or basket exposure	Fund receives/ (pays) rate	CCY	Nominal [sub-fund CCY]	Market value [sub-fund CCY]	Unrealised appreciation/ (depreciation) [sub-fund CCY]
Total							

At year-end, the fund received from [name of counterparty] the following collateral:
 [Sub-fund name]: [Type and amount of collateral]

14.4 Variance and Volatility Swaps

Denomination	Currency	Maturity	Nominal Value	Counterparty	Unrealised appreciation/ (depreciation) [sub-fund CCY]

At year-end, the fund received from [name of counterparty] the following collateral:
 [Sub-fund name]: [Type and amount of collateral]

Please note that above suggested disclosure is the best practice UCITS like disclosure. It is not mandatory as per SIF or RAIF Law to provide full disclosure, only qualitative and quantitative information enabling investors judgment on evolution and return of the activity.

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Notes to the financial statements as at [closing date] (continued)

Note 15 - Futures contracts

At year-end, the sub-fund [name of the sub-fund] has entered into the following futures contracts:

CCY	Number of contracts bought/(sold)	Security description/ Underlying	Maturity	Notional value / Commitment [sub-fund CCY]	Unrealised appreciation/ (depreciation) [sub-fund CCY]
Total					

At year-end, the fund received from [name of counterparty] the following collateral:
 [Sub-fund name] : [Type and amount of collateral]

Please note that above suggested disclosure is the best practice UCITS like disclosure. It is not mandatory as per SIF or RAIF Law to provide full disclosure, only qualitative and quantitative information enabling investors judgment on evolution and return of the activity.

Note 16 - Forward foreign exchange contracts

At year-end, the sub-fund [name of the sub-fund] has entered into the following forward foreign exchange contracts:

Settlement date	Counterparty	CCY purchased	Amount bought	CCY sold	Amount sold	Unrealised appreciation/ (depreciation) [sub-fund CCY]
Total						

Note 17 - Contracts for difference

At year-end, the sub-fund [name of the sub-fund] has entered into the following contracts for difference:

CCY	Counter-party	Quantity	Description	Market value of underlying securities	Unrealised appreciation / (depreciation)	% of net assets
Total						

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date] (continued)

Note 17 - Contracts for difference (continued)

At year-end, the fund received from [name of counterparty] the following collateral: [Sub-fund name]: [Type and amount of collateral]

Please note that above suggested disclosure is the best practice UCITS like disclosure. It is not mandatory as per SIF or RAIF Law to provide full disclosure, only qualitative and quantitative information enabling investors judgment on evolution and return of the activity.

Note 18 - Securities lending

Guidance:
 In case of reinvestment of the cash provided as a guarantee/collateral in the context of securities lending transactions, these reinvestments need to be indicated in the annual report.
 The name of each counterparty must be disclosed (not only the securities lending agent).

As at year-end, the market value of the securities on loan open with [name of counterparty] is as follows:

Sub-fund	Total market value of securities on loan [sub-fund CCY]	Amount of collateral received [sub-fund CCY]	Type of Collateral (cash/ bond/shares)
Total			

For the year ended [date] the securities lending income generated by the Fund is as follows:

Sub-fund	Total gross amount of securities lending income [sub-fund CCY]	Direct and indirect costs and fees deducted from gross securities lending income [sub-fund CCY]	Total net amount of securities lending income [sub-fund CCY]
Total			

Please note that above suggested disclosure is the best practice UCITS like disclosure. It is not mandatory as per SIF or RAIF Law to provide full disclosure, only qualitative and quantitative information enabling investors judgment on evolution and return of the activity.

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Audited annual report as at [closing date]

Notes to the financial statements as at [closing date] (continued)

Note 19 - Repurchase and reverse repurchase agreements

Repurchase agreements

The table below shows the amounts received as collateral for repurchase agreements by sub-fund:

Sub-fund	Counterparty	Cash-paid	Collateral received	Market value of collateral received	% of collateral received

Reverse repurchase agreements

The table below shows the amounts pledged as collateral for reverse repurchase agreements by sub-fund:

Sub-fund	Counterparty	Cash received	Collateral pledged	Market value of collateral pledged	% of collateral pledged

The Fund uses repurchase and reverse repurchase agreements for Efficient Portfolio Management. The revenues and costs arising from them are presented in the statement of operations and changes in net assets under “Interest income on repurchase and interest expense on reverse repurchase agreements”.

Please note that above suggested disclosure is the best practice UCITS like disclosure. It is not mandatory as per SIF or RAIF Law to provide full disclosure, only qualitative and quantitative information enabling investors judgment on evolution and return of the activity.

Note 20 - Collateral

Guidance:
Please note that above suggested disclosure is the best practice UCITS like disclosure. It is not mandatory as per SIF or RAIF Law to provide full disclosure, only qualitative and quantitative information enabling investors judgment on evolution and return of the activity.

As at [closing date], the following securities are held with brokers as collateral on derivatives instruments:

Security description	Nominal
Total	

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Notes to the financial statements as at [closing date] (continued)

Note 20 - Collateral (continued)

As at [closing date], certain sub-funds received/paid cash collateral from/to counterparty. The sub-funds may reinvest the cash collateral they received.

Sub-fund	CCY	Due from brokers Due to brokers	Type of derivative	Cash collateral balance

Note 21 - Statement of changes in portfolio

Upon request to be addressed to the registered office of the Fund/Management Company, a copy of the statement of changes in the portfolio for the year/period ended [closing date] can be obtained free of charge.

Note 22 - Realised gains and losses on investments

Sub-fund	CCY	Realised gain on investments	Realised loss on investments

Note 23 - Change in unrealised appreciation and depreciation on investments

Sub-fund	CCY	Change in unrealised appreciation on investments	Change in unrealised depreciation on investments

Note 24 - Subsequent events

Guidance:

Any important change or development which impacts the activity of the Fund between year-end and the date of finalisation of the annual report, needs to be disclosed.

*Art 65 (1) 18°
of the Law 10
August 1915, as
amended*

- on [date]: launch of [name of the sub-fund]
- on [date]: [name of the sub-fund] merged with [name of the sub-fund]
- on [date]: [name of the sub-fund] was liquidated

In case of RAIF with multiple sub-funds

Circular RCSL
16_01

[Name of the Fund]

[SICAV/FCP]

R.C.S. Luxembourg B[]/R.C.S. K []

Audited annual report as at [closing date]

This report does not constitute an offer of shares. No subscription can be received on account of financial reports. Subscriptions are only valid if made on the basis of the current prospectus, supplemented by the latest available annual report of the fund.

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Management and administration of the Fund⁸

Guidance:

This section aims at describing the main players in the supervision/operating activities of the Fund. It needs to be tailored in accordance with the Fund's specific organisation and in line with the latest available prospectus published before year-end.

Registered office of the fund/management company⁹/AIFM

[Name of the Company]

[Address]

Board of Directors

Chairman

[Name of the Chairman]

[Name of the Company]

[Function]

[Address]

Directors

[Name of the Director]

[Name of the Company]

[Function]

[Address]

[Name of the Director]

[Name of the Company]

[Function]

[Address]

Depository bank

[Name of the Depository bank]

[Address]

Domiciliation agent

[Name of the domiciliation agent]

[Address]

Investment manager

[Name of the investment manager]

[Address]

**Administrative agent,
transfer agent and paying agent**

[Name of the administrative agent, transfer
agent and paying agent]

[Address]

Auditor

[Name of the auditor]

[Address]

Management company⁹/AIFM

[Name of the management company/AIFM]

[Address]

⁸. Best practice is to disclose changes made during the year with the relevant effective date.

⁹. All FCPs have a management company/AIFM. For SICAVs, this is possible but not required (e.g. self-managed SICAVs).

[Name of the Fund]
Audited annual report as at [closing date]

Activity report

*Art 68 (2) of
the Law of 19
December 2002,
as amended
Art 38 (4) of the
Law of 23 July
2016*

Content

The annual report must include a report on the activities of the past financial year as well as any significant information giving the investor the possibility to judge the activity evolution and the return of the RAIF.

For RAIFs managed by authorised AIFM please make sure you consider to add in the activity report (or in unaudited section) information about risk and liquidity management, leverage, material changes and remuneration disclosure.

For further details please refer to dedicated appendix 3.

Audit report

The audit report will be provided by the audit team which will be tailored to the specific fund including the applicable reporting framework and auditing standards.

[Name of the Fund]
Audited annual report as at [closing date]

Combined statement of net assets as at [closing date]

Guidance:

For all statements, captions that are not applicable to the fund's activity should be removed. The aggregation of captions is possible at the discretion of the Board of Directors.

		Combined [CCY]
	Notes	
Assets		
Investments at market value		
(Cost of investments*)	2.2	
Options bought at market value	2.9-13	
Cash at bank		
Time deposit		
Margin accounts/cash at broker		
Receivable on investments sold	2.8	
Receivable on subscriptions		
Receivable for repurchase agreements	2.12	
Unrealised appreciation on forward foreign exchange contracts	2.11-16	
Unrealised appreciation on futures contracts	2.10-15	
Unrealised appreciation on contracts for difference	2.13, 17	
Unrealised appreciation on swap contracts/ swap contracts at market value	2.14, 2.15, 2.16, 2.17, 2.18 -14	
Dividends receivable	2.4	
Interest receivable	2.4	
Formation expenses, net of amortisation	2.19	
Other assets/receivables		
Total assets	

*Disclosure of cost of investment is optional (either in the statement of net assets or in the statement of investments)

The accompanying notes form an integral part of these financial statements.

[Name of the Fund]
Audited annual report as at [closing date]

Combined
[CCY]

	Notes	
Liabilities		
Options written at market value	2.9-13	
Bank overdraft		
Payable on investments purchased	2.8	
Payable on redemptions		
Payable for reverse repurchase agreements	2.12	
Unrealised depreciation on forward foreign exchange contracts	2.11-16	
Unrealised depreciation on futures contracts	2.10-15	
Unrealised depreciation on contracts for difference	2.13, 17	
Unrealised depreciation on swap contracts/ swap contracts at market value	2.14, 2.15, 2.16, 2.17, 2.18 - 14	
Management fees payable	3	
Investment management/advisory fees payable	5	
Depository bank fees payable	7	
Transfer agent fees payable	8	
Administrative agent and domiciliation agent fees payable	4	
Performance fees payable	6	
Subscription tax payable ("taxe d'abonnement")	10	
Dividends payable to shareholders	12	
Other payables/liabilities		
Total liabilities	
Net assets at the end of the year/period	

The accompanying notes form an integral part of these financial statements.

[Name of the Fund]
Audited annual report as at [closing date]

**Combined statement of operations and changes in net assets
for the year ended [closing date]**

**Combined
[CCY]**

	Notes	
Net assets at the beginning of the year/period		
Income		
Dividend income, net of withholding taxes	2.4	
Interest income on bonds, net of withholding taxes	2.4	
Interest income on repurchase agreements	2.12	
Interest income on swap contracts	2.14, 2.15, 2.16, 2.17, 2.18	
Other income		
Total income	
Expenses		
Management fees	3	
Investment management/advisory fees	5	
Performance fees	6	
Depository bank fees	7	
Transfer agent fees	8	
Administrative agent and domiciliation agent fees	4	
Distribution fees	9	
Professional fees		
Subscription tax ("taxe d'abonnement")	10	
Amortisation of formation expenses	2.19	
Bank and interest expense		
Interest expense on reverse repurchase agreements	2.12	
Interest expense on swap contracts	2.14, 2.15, 2.16, 2.17, 2.18	
Other expenses ¹⁰	11	
Total expenses	
Net investment income/(loss)	

The accompanying notes form an integral part of these financial statements.

¹⁰. When other expenses > 10% total expenses – Best practice is to add a note detailing this caption (cfr illustrative of notes)

[Name of the Fund]
Audited annual report as at [closing date]

		Combined [CCY]
	Notes	
Net investment income/(loss) (carried forward from previous page)	
Net realised gains/(losses)		
- on investments	2.7, 22	
- on options	2.9	
- on forward foreign exchange contracts	2.11	
- on futures contracts	2.10	
- on contracts for difference	2.13	
- on swap contracts	2.14, 2.15, 2.16, 2.17, 2.18	
- on foreign currency	2.5	
Net realised gains/(losses) for the year/ period	
Change in net unrealised appreciation/ depreciation		
- on investments	23	
- on options	2.9	
- on forward foreign exchange contracts	2.11	
- on futures contracts	2.10	
- on contracts for difference	2.13	
- on swap contracts	2.14, 2.15, 2.16, 2.17, 2.18	
Change in net unrealised appreciation/ depreciation for the year/period	
Result of operations for the year/period	
Subscriptions		
Redemptions		
Dividends paid	12	
Exchange difference		
Net assets at the end of the year/period	

The accompanying notes form an integral part of these financial statements.

[Name of the Fund]
Audited annual report as at [closing date]

Statistical information

Guidance:

All share classes need to be indicated. In case some share classes are not active at year-end, they still need to be disclosed in the historical data for the year when they were active (N-1 to N-2).

	Year-end [N] [CCY]	Year-end [N-1] [CCY]	Year-end [N-2] [CCY]
Total net assets			
[Name of sub-fund]			
Total net assets			
Number of shares outstanding			
[class X]*			
[class Y]			
NAV per share			
[class X]*			
[class Y]			

* In case of a share class liquidation/merger during the year, best practice is to indicate the latest available information (NAV/share, number of shares outstanding and date of liquidation/merger).

In case of the financial statements of certain sub-funds have been prepared on a non-going concern basis (Refer to Note 2.1), to enable the investors to reconcile the NAV disclosed in the audited financial statements ("audited NAV") with the NAV published at financial year-end, it is best practice to disclose both the audited NAV and the NAV published in the statistical section of the annual report (total NAV and NAV per share over the last three financial years), with a note to the financial statements explaining the origin of the difference (refer to example in included in Note 2.1).

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date]

Note 1 - General Information

For a FCP - specific disclosure

[Name of the FCP] (the Fund) is an open-ended investment fund and has been created on [date] as a FCP ("Fonds Commun de Placement"). The Fund is governed by the provisions of the Law of 23 July 2016.

The Fund is an unincorporated co-proprietorship of its securities and other assets, managed by [management company name] (the "Management Company"). The assets of the Fund are segregated from those of the Management Company.

For a SICAV

[Name of the SICAV] (the Fund) is an open-ended investment fund and has been incorporated on [date] under Luxembourg laws as a "Société d'Investissement à Capital Variable" for an unlimited period of time. The Fund is governed by the provisions of the Law of 23 July 2016.

The Fund comprises various sub-funds, each relating to a separate investment portfolio of securities, cash and other assets. Separate classes of shares are issued in relation to the sub-funds.

The Board of Directors of the Fund may authorise the creation of additional sub-funds/share classes in the future.

The Fund has appointed [name of Alternative Investment Fund Manager] as AIFM within the meaning of the AIFM Law of 12 July 2013, in accordance with the terms and conditions of the AIFM Services Agreement, effective as from 22 July 2014. In this respect, the AIFM is responsible for investment management services, administration, including valuation of the assets of the Fund, registrar and transfer agency services, marketing, domiciliation and activities related to the assets of the Fund. The AIFM is further responsible for the management of conflict of interest and the control of the well-informed status of the investors or Shareholders.

As at [closing date], the following [number] sub-funds are active:

- [name of the sub-fund]
- [name of the sub-fund]
- ...

Guidance:

PwC best practice: The list of all share classes available for subscription and their specific features (distribution, capitalisation, fee level, etc.) should be disclosed. The information should be similar to the description in the Fund's prospectus.

During the year, the following changes were made:

1) Launch of sub-fund(s):

On [date], [name of the sub-fund] has been launched

2) Change in name of sub-fund(s):

On [date], [name of the sub-fund] became [new name of the sub-fund]

3) Merger(s): (indicate share exchange ratio)

On [date], [name of the sub-fund] merged with [name of the sub-fund]

4) Liquidation of sub-fund(s):

On [date], [name of the sub-fund] has been liquidated

In each sub-fund, the Fund may issue shares in the following categories, which differ mainly in respect of fees, commissions and distribution policy:

- [class X: insert specificity]
- [class Y: insert specificity]

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date] (continued)

Note 2 to Note 23 - same notes as for SIF disclosure

Note 24 - Statement of investments as at [closing date]

Nominal/quantity	Description	Security currency	Market value [CCY]	Market value as a percentage of net assets %
[Name of the sub-fund] (expressed in [CCY])				
Shares	Total shares			
Bonds	Total bonds			
Warrants/rights	Total warrants/ rights			
Total Investments		
[Name of the sub-fund] (expressed in [CCY])				
Shares	Total shares			
Bonds	Total bonds			
Warrants/rights	Total warrants/ rights			
Total Investments		

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date] (continued)

Note 25 - Statement of net assets as at [closing date]

Guidance:

For all the statements, captions that are not applicable to the fund's activity should be removed. The aggregation of captions is possible at the discretion of the Board of Directors

	[Name of sub-fund 1 CCY]	[Name of sub-fund 2 CCY]
Assets		
Investments at market value		
(Cost of investments*)		
Options bought at market value		
Cash at bank		
Time deposit		
Margin accounts/cash at broker		
Receivable on investments sold		
Receivable on subscriptions		
Receivable for repurchase agreements		
Unrealised appreciation on forward foreign exchange contracts		
Unrealised appreciation on futures contracts		
Unrealised appreciation on contracts for difference		
Unrealised appreciation on swap contracts/ swap contracts at market value		
Dividends receivable		
Interest receivable		
Formation expenses, net of amortisation		
Other assets/receivables		
Total assets

*Disclosure of cost of investment is optional (either in the statement of net assets or in the statement of investments)

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date] (continued)

Note 25 - Statement of net assets as at [closing date] (continued)

	[Name of sub-fund 1 CCY]	[Name of sub-fund 2 CCY]
Liabilities		
Options written at market value		
Bank overdraft		
Payable on investments purchased		
Payable on redemptions		
Payable for reverse repurchase agreements		
Unrealised depreciation on forward foreign exchange contracts		
Unrealised depreciation on futures contracts		
Unrealised depreciation on contracts for difference		
Unrealised depreciation on swap contracts/ swap contracts at market value		
Management fees payable		
Investment management/advisory fees payable		
Depository bank fees payable		
Transfer agent fees payable		
Administrative agent and domiciliation agent fees payable		
Performance fees payable		
Subscription tax payable ("taxe d'abonnement")		
Dividends payable to shareholders		
Other payables/liabilities		
Total liabilities
Net assets at the end of the year/period

Guidance:

In case of liquidation of a sub-fund, the following must be considered:

- If all the assets and liabilities of the liquidated sub-funds have been settled: there is nothing to disclosed in the statement of net assets.
- If all the assets and liabilities of the liquidated sub-funds have not been settled: material remaining assets and liabilities must be disclosed in the annual report. PwC best practice is to include in a note to the financial statements providing the detail of the remaining assets/liabilities at the closing date.

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date] (continued)

Note 26 - Statement of operations and changes in net assets for the year ended [closing date]

	[Name of sub-fund 1 CCY]	[Name of sub-fund 2 CCY]
Net assets at the beginning of the year/period		
Income		
Dividend income, net of withholding taxes		
Interest income on bonds, net of withholding taxes		
Interest income on repurchase agreements		
Interest income on swap contracts		
Other income		
Total income
Expenses		
Management fees		
Investment management/advisory fees		
Performance fees		
Depository bank fees		
Transfer agent fees		
Administrative agent and domiciliation agent fees		
Distribution fees		
Professional fees		
Subscription tax ("taxe d'abonnement")		
Amortisation of formation expenses		
Bank and interest expenses		
Interest expense on reverse repurchase agreements		
Interest expense on swap contracts		
Other expenses		
Total expenses
Net investment income/(loss)

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date] (continued)

Note 26 - Statement of operations and changes in net assets for the year ended [closing date] (continued)

	[Name of sub-fund 1 CCY]	[Name of sub-fund 2 CCY]
Net investment income/(loss)		
(carried forward from previous page)
Net realised gains/(losses)		
- on investments		
- on options		
- on forward foreign exchange contracts		
- on futures contracts		
- on contracts for difference		
- on swap contracts		
- on foreign currency		
Net realised gains/(losses) for the year/period
Change in net unrealised appreciation/ depreciation		
- on investments		
- on options		
- on forward foreign exchange contracts		
- on futures contracts		
- on contracts for difference		
- on swap contracts		
Change in net unrealised appreciation/ depreciation for the year/period
Result of operations for the year/period
Subscriptions		
Redemptions		
Dividends paid		
Exchange difference		
Net assets at the end of the year/period

Guidance:

In case of liquidation, sub-fund's profit and loss activity of the period must be disclosed.

[Name of the Fund]
Audited annual report as at [closing date]

Notes to the financial statements as at [closing date] (continued)

Note 27 - Subsequent events

Guidance:

Any important change or development which impacts the activity of the Fund between year-end and the date of finalisation of the annual report, needs to be disclosed.

*Art 65 (1) 18°
of the Law 10
August 1915, as
amended*

- on [date]: launch of [name of the sub-fund]
- on [date]: [name of the sub-fund] merged with [name of the sub-fund]
- on [date]: [name of the sub-fund] was liquidated

Appendices

Introduction

Luxembourg GAAP requires specific information to be disclosed in the annual report. In addition to this, the Law on Alternative Investments Funds, the Securities Financing Transactions Regulation and the foreign supervisory authorities in countries where a fund is authorised for public distribution may require additional specific disclosures. Some can be made in the format of supplementary information inserted at the end of the annual report; some other may require the preparation of a specific version of the annual report.

Appendix 1: Securities Financing Transactions Regulation (SFTR) – Disclosures

Appendix 2: Guidance on remuneration disclosure in regards to UCITS V

Appendix 3: Disclosure requirements for AIFS (AIFMD)

Appendix 4: Foreign distribution – overview of specific additional information to be included in the annual report of Luxembourg funds

Appendix 5: Illustrative country specific disclosure

Appendix 6: Additional information on specific requirements when filing annual reports with local authorities

Appendix 7: Glossary

Appendix 1: Securities Financing Transactions Regulation (SFTR) – Disclosures

Definition:

Regulation (EU) 2015/2365 of the European Parliament and of the Council of 25/11/2015 (648/2012) (“the Regulation”)

Under Article 13 of the Regulation, disclosure requirements detailed in Section A of its annex are applicable for all UCITS and AIFs¹¹. It is required to be included in all annual and semi-annual reports published after 13 January 2017 and is applicable only for the following instruments: repurchase agreements (Repo)/reverse repurchase agreements (Reverse Repo), Buy/sell back transaction, securities lending/borrowing and total return swaps.

SFTs: repurchase agreements (Repo)/reverse repurchase agreements (Reverse Repo), Buy/sell back transaction, securities lending

TRS: Total return swaps

Sub-fund 1: Securities lending

Sub-fund 2: Securities lending

Sub-fund 3: Repurchase agreements/reverse repurchase agreements

Sub-fund 4: Total return swaps

This disclosure has been prepared assuming that:

-no collateral has been received on TRS;

-collateral has been received on securities lending and Repo.

Suggested presentation:

The Regulation does not require that information required by Section A of the annex needs to be audited and as such inclusion in the unaudited section of the annual report is the most common practice we observe.

Global data

The requirement is to disclose:

- *The amount of securities and commodities on loan as a **proportion of total lendable assets** defined as excluding cash and cash equivalents;*
- *The amount of assets engaged in each type of SFTs and total return swaps expressed as an absolute amount (in the collective investment undertaking's currency) and as a **proportion of the collective investment undertaking's assets under management (AUM)**.*

Guidance:

Under Amount: Market value of positions as at reporting date expressed in the sub-fund's currency - Should be reconcilable to the statement of net assets and/or portfolio listing.

Under % of AUM: Amount (as described above) divided by the sub-fund's total net asset value.

Under % of lendable assets (for securities lending only): Total assets, less cash and cash equivalents, less receivables, less restricted/pledged assets.

¹¹. According to the cross-reference in Art 13 (1) b) of the SFTR to Art 22 AIFMD (being Art 20 of the Law of 12 July 2013 in Luxembourg) non-EU AIF selling only outside of the EU are not in scope of the disclosure requirements of Art 13 SFTR.

Securities lending:

The following table shows the market value of securities lent and as its percentage of the total of net assets and of the lendable assets. The lendable assets are defined as the sum of captions “Shares portfolio at market value” and “Bonds portfolio at market value” as shown in the Statement of Net Assets minus positions, which are excluded from lending, if any.

Sub-fund name	Sub-fund ccy	Market value of securities lent*	% of AUM	Market value of securities lent as a % of lendable assets
Sub-fund 1	EUR	XXXXXX	XXXXXX	XXXXXX
Sub-fund 2	USD	XXXXXX	XXXXXX	XXXXXX

*Sum of the absolute market values

Total return swaps:

The table shows the market value of total return swaps expressed as an absolute amount.

Sub-fund name	Sub-fund ccy	Market value of TRS*	% of AUM
Sub-fund 4	USD	XXXXXX	XXXXXX

*Sum of the absolute market values

Repurchase agreements/reverse repurchase agreements:

The table shows the market value of repurchase agreements/reverse repurchase agreements expressed as an absolute amount.

Sub-fund name	Sub-fund ccy	Market value of Repo/reverse Repo*	% of AUM
Sub-fund 3	EUR	XXXXXX	XXXXXX

*Sum of the absolute market values

Concentration data

The requirement is to disclose:

- **Ten largest collateral issuers** across all SFTs and total return swaps (break down of volumes of the collateral securities and commodities received per issuer's name);
- **Top 10 counterparties** of each type of SFTs and total return swaps separately (Name of counterparty and gross volume of outstanding transactions).

Guidance:

Under Issuer: the issuer is the issuer of the securities received as collateral by the fund (i.e. French Government, UK Government, IBM, etc.).

Under Amount:

- Market value of collateral positions received as at reporting date expressed in the sub-fund's currency by issuer (as only the first ten issuers are listed the total amounts will not be reconcilable to the information on collateral received disclosed in the notes if there are more than ten collateral issuers).
- Market value of SFTs/TRS positions received as at reporting date expressed in the sub-fund's currency (as only the top 10 counterparties are listed, the total amount will not be reconcilable to information on collateral received disclosed in the notes if there are more than ten counterparties).

Securities lending:

Cash and non-cash collateral have been received in relation to the securities lending activity.

The following table shows the non-cash collateral sorted as per the country of the security issuer:

Sub-fund name	Sub-fund ccy	Issuer Country	Market value of collateral received (in sub-fund ccy)
Sub-fund 1	EUR	XXXXXX	XXXXXX
		XXXXXX	XXXXXX
		XXXXXX	XXXXXX
		XXXXXX	XXXXXX
		XXXXXX	XXXXXX
		XXXXXX	XXXXXX
		XXXXXX	XXXXXX
		XXXXXX	XXXXXX
			XXXXXX
Sub-fund 2	USD	XXXXXX	XXXXXX
		XXXXXX	XXXXXX
		XXXXXX	XXXXXX
			XXXXXX

The counterparties (borrowers) and corresponding transactions volume are disclosed per sub-fund in the Note 1 – Securities Lending, attached in Addendum.

Top ten counterparties for securities lending by sub-fund

Counterparty	Market value of SFTs (in sub-fund ccy)	Counterparty	Market value of SFTs (in sub-fund ccy)
Sub-fund 1		Sub-fund 2	
Counterparty 1	XXXX	Counterparty 1	XXXXXX
Counterparty 2	XXXX	Counterparty 2	XXXXXX
Counterparty 3	XXXX	Counterparty 3	XXXXXX
Counterparty 4	XXXX	Counterparty 4	XXXXXX
Counterparty 5	XXXX	Counterparty 5	XXXXXX
Counterparty 6	XXXX	Counterparty 6	XXXXXX
Counterparty 7	XXXX	Counterparty 7	XXXXXX
Counterparty 8	XXXX	Counterparty 8	XXXXXX
Counterparty 9	XXXX	Counterparty 9	XXXXXX
Counterparty 10	XXXX	Counterparty 10	XXXXXX

Total return swaps:

No collateral has been received for total return swaps.

The value of total return swaps is shown in the corresponding tables under Statement of Investments in Securities and Other Net Assets. *Cf Statement of Investments in Securities and Other Net Assets in Addendum.*

Top ten counterparties for total return swaps by sub-fund (should be disclosed separately)

Counterparty	Market value of TRS (in sub-fund ccy)
Sub-fund 4	
Counterparty 1	XXXXX
Counterparty 2	XXXXX
Counterparty 3	XXXXX
Counterparty 4	XXXXX
Counterparty 5	XXXXX
Counterparty 6	XXXXX
Counterparty 7	XXXXX
Counterparty 8	XXXXX
Counterparty 9	XXXXX
Counterparty 10	XXXXX

Repurchase agreements/reverse repurchase agreements:

Cash and non-cash collateral have been received in relation to the repurchase agreements/reverse repurchase agreements activity.

The following table shows the non-cash collateral sorted as per the country of the security issuer:

Sub-fund name	Sub-fund ccy	Issuer Country	Market value of collateral received (in sub-fund ccy)
Sub-fund 3	EUR	XXXXX	XXXXX
			XXXXX

Top ten counterparties for repurchase agreements/reverse repurchase agreements by Sub-Fund

Counterparty	Market value of SFTs (in sub-fund ccy)
Sub-fund 3	
Counterparty 1	XXXXX
Counterparty 2	XXXXX
Counterparty 3	XXXXX
Counterparty 4	XXXXX
Counterparty 5	XXXXX
Counterparty 6	XXXXX
Counterparty 7	XXXXX
Counterparty 8	XXXXX
Counterparty 9	XXXXX
Counterparty 10	XXXXX

Aggregate transaction data

The requirement is to disclose:

- Type and quality of collateral;
- Maturity tenor of the collateral broken down in the following maturity buckets: less than one day, one day to one week, one week to one month, one to three months, three months to one year, above one year, open maturity;
- Maturity tenor of the SFTs and total return swaps broken down in the following maturity buckets: less than one day, one day to one week, one week to one month, one to three months, three months to one year, above one year, open transactions;
- Currency of the collateral;
- Country in which the counterparties are established;
- Settlement and clearing (e.g., tri-party, Central Counterparty, bilateral).

Securities lending:

The table below shows the type and quality of collateral received for securities lending by sub-fund:

				Credit rating				
				Investment Grade (Moody's long term rating)				
Sub-fund name	Sub-fund ccy	Asset type	Total collateral	Aaa	Aa1	Aa2	Aa3	A1
Sub-fund 1	EUR	Cash	XXXXX	-	-	-	-	-
		Sovereigns	XXXXX	XXXXX	XXXXX	XXXXX	XXXXX	-
		TBonds	XXXXX	XXXXX	-	-	-	-
		TNotes	XXXXX	XXXXX	-	-	-	-
			XXXXX	XXXXX	XXXXX	XXXXX	XXXXX	-
Sub-fund 2	USD	Sovereigns	XXXXX	XXXXX	-	XXXXX	-	XXXXX
			XXXXX	XXXXX	-	XXXXX	-	XXXXX

The Securities lending contracts have an open maturity, so the lending ends when the borrower returns the security back to XXXXX (the Lending Agent) either because he doesn't need the security anymore or simply because the lending agent has recalled the security (to settle a trade, for instance).

In the table hereafter, the maturity tenor of non-cash collateral has been defined as the remaining time from report date to securities' maturity date. The maturity tenor of cash collateral has been set to "open maturity".

Sub-fund name	Sub-fund ccy	Maturity	Market value of securities lent	Collateral received amount
Sub-fund 1	EUR	One to three months	-	XXXXX
		Three months to one year	-	XXXXX
		Above one year	-	XXXXX
		Open maturity	XXXXX	XXXXX
			XXXXX	XXXXX
Sub-fund 2	USD	One to three months	-	XXXXX
		Three months to one year	-	XXXXX
		Above one year	-	XXXXX
		Open maturity	XXXXX	-
			XXXXX	XXXXX

The following table shows the cash and non-cash collateral received broken down by currency by sub-fund:

Sub-fund name	Sub-fund ccy	Collateral currency	Total collateral (in sub-fund ccy)
Sub-fund 1	EUR	EUR	XXXXX
		USD	XXXXX
			XXXXX
Sub-fund 2	USD	EUR	XXXXX
		USD	XXXXX
			XXXXX

The following table shows the market value of securities lent broken down by country of counterparty by sub-fund:

Sub-fund name	Sub-fund ccy	Borrower country	Market value of securities lending
Sub-fund 1	EUR	XXXXX	XXXXX
		XXXXX	XXXXX
		XXXXX	XXXXX
			XXXXX
Sub-fund 2	USD	XXXXX	XXXXX
			XXXXX

All security lending trades are settled and cleared bilaterally.

Total return swaps:

No collateral has been received for total return swaps.

Total return swaps have a defined maturity which represents “Three months to one year” for the total value of the contracts.

Transactions in total return swaps are bilateral trades.

The tables hereafter disclose the market value of total return swaps broken down by country of counterparty, maturity and, settlement and clearing methods by sub-fund:

Sub-fund name	Sub-fund ccy	Counterparty	Counterparty country	Maturity	Settlement and clearing	Market value of TRS
Sub-fund 4	USD	Counterparty 2	United Kingdom	Three months to one year	Bilateral	XXXXX

Repurchase agreements/reverse repurchase agreements:

The table below shows the type and quality of collateral received for repurchase agreements/reverse repurchase agreements by sub-fund:

Sub-fund name	Sub-fund ccy	Asset type	Total collateral	Credit rating				
				Investment Grade (Moody's long term rating)				
				Aaa	Aa1	Aa2	Aa3	A1
Sub-fund 3	EUR	Bonds	XXXXX	-	XXXXX	-	-	-
			XXXXX	-	XXXXX	-	-	-

Repurchase agreements/reverse repurchase agreements have a defined maturity which represents “above one year” for the total value of the contracts.

In the table hereafter, the maturity tenor of non-cash collateral has been defined as the remaining time from report date to securities' maturity date. The maturity tenor of cash collateral has been set to “open maturity”.

Sub-fund name	Sub-fund ccy	Maturity	Market value of repurchase agreements/reverse repurchase agreements	Collateral received amount
Sub-fund 3	EUR	One to three months	XXXXX	XXXXX
		Three months to one year	XXXXX	XXXXX
		Above one year	XXXXX	XXXXX
		Open maturity	XXXXX	XXXXX
			XXXXX	XXXXX

The following table shows the cash and non-cash collateral received broken down by currency by sub-fund:

Sub-fund name	Sub-fund ccy	Collateral currency	Total collateral (in sub-fund ccy)
Sub-fund 3	EUR	EUR	XXXXX
			XXXXX

The following table shows the market value of repurchase agreements/reverse repurchase agreements broken down by country of counterparty by sub-fund:

Sub-fund name	Sub-fund ccy	Borrower country	Market value of repurchase agreements/reverse repurchase agreements
Sub-Fund 3	EUR	France	XXXXX
			XXXXX

Transactions in repurchase agreements/reverse repurchase agreements are bilateral trades.

Data on reuse of collateral

The requirement is to disclose:

- *Share of collateral received that is reused, compared to the maximum amount specified in the prospectus or in the disclosure to investors;*
- *Cash collateral reinvestment returns to the collective investment undertaking.*

Guidance:

Under collateral re-used: Portion of collateral received that is reused expressed in the sub-fund's currency (amounts will not be reconcilable to information in the financial statements).

Under Returns: Total value of the cash collateral reinvestment returns over the period/year expressed in fund currency (% will not be reconcilable to information in the financial statements).

Securities lending:

The non-cash collateral received for the benefit of a sub-fund may not be sold, re-invested or pledged. The full cash collateral value received for securities lending activities is reinvested in reverse repurchase agreement transactions.

These transactions generate revenues which are used to pay the cash management fee to the lending agent, the rebate to the borrower and the "total gross amount of securities lending income" as disclosed in the Note 18 – Securities Lending.

Or if no collateral re-used:

The sub-funds do not engage in any re-use of collateral.

Total return swaps:

No collateral has been received for total return swaps.

Repurchase agreements/reverse repurchase agreements:

The sub-funds do not engage in any re-use of collateral.

Or if collateral re-used:

Collateral as at XX/XX/XX	Amount	% re-used
Collateral re-used	XXXX	x%
Total Collateral	XXXX	
Return for period XX to XX	XXXX	

Safekeeping of collateral received by the collective investment undertaking as part of SFTs and TRS

The requirement is to disclose:

- *Number and names of custodians and the amount of collateral assets safe-kept by each of the custodians.*

Guidance:

Under Amount: Market value of collateral positions received as at reporting date expressed in the sub-fund's currency (total amount should be reconcilable to information on collateral received disclosed in the notes).

Securities lending:

All the collateral assets are safe-kept by the depositary XXXX. The safekeeping of the collateral received in the scope of securities lending transactions has been delegated from XXXX to the Lending Agent.

Or if collateral held at different custodians:

Sub-fund name	Sub-fund ccy	Custodian A	Custodian B	Custodian C	Custodian D
Sub-fund 1	EUR	XXXXX	XXXXX	XXXXX	XXXXX
Sub-fund 2	USD	XXXXX	XXXXX	XXXXX	XXXXX

Total return swaps:

No collateral has been received for total return swaps.

Repurchase agreements/reverse repurchase agreements:

All the collateral assets are safe-kept by the depositary XXXX.

All cash and non-cash collateral, disclosed in the tables above, are held on pooled accounts, but segregated from depositary's assets.

Safekeeping of collateral granted by the collective investment undertaking as part of the SFTs and TRS

The requirement is to disclose:

- *The proportion of collateral held in segregated accounts or in pooled accounts, or in any other accounts.*

Guidance:

Segregated account vs Pooled account: A pooled account is an account where the derivative positions and associated collateral assets of multiple clients are recorded while a segregated account will be client specific.

Securities lending:

All collateral granted by the Fund is held in segregated collateral accounts.

Total return swaps:

No collateral has been granted for total return swaps.

Repurchase agreements/reverse repurchase agreements:

All collateral granted by the Fund is held in segregated collateral accounts.

Data on return and cost for each type of SFTs and TRS

The requirement is to disclose:

- the return and cost for each type of SFTs and TRS broken down between the collective investment undertaking, the manager of the collective investment undertaking and third parties (e.g. agent lender) in absolute terms and as a percentage of overall returns generated by that type of SFTs and total return swaps.

Guidance:

Under Returns: Total value of the returns generated by each SFT/TRS over the period/year expressed in sub-fund currency - Only the portion allocated to the fund should be reconcilable to information in the financial statements.

Under Costs: Total value of the costs linked to the SFT/TRS over the period/year expressed in sub-fund currency - Most of these costs will not be reconcilable to information in the financial statements, as most of the time income is recorded net of costs. Under Amount: Market value of collateral positions granted as at reporting date expressed in the sub-fund's currency - Total amount may be reconcilable to other collateral disclosures.

Securities lending:

The return and cost for the securities lending activity are disclosed per sub-fund in the Note 1 - Securities Lending, attached in Addendum to SFTR.

	Total gross amount of securities lending's income	Direct and indirect cost and fees deducted by securities lending's agent	% return of securities lending's agent	Net securities lending's income retained by the sub-fund	% return of the sub-fund
Sub-fund 1	XXXXX	XXXXX	XXXXX	XXXXX	XX%
Sub-fund 2	XXXXX	XXXXX	XXXXX	XXXXX	XX%

Total return swaps:

All the return of the total return swaps is attributed to the sub-funds. The transaction costs are not separately identifiable.

Repurchase agreements/reverse repurchase agreements:

All the return of the repurchase agreements/reverse repurchase agreements is attributed to the sub-funds. The transaction costs are not separately identifiable.

ADDENDUM TO SFTR

Note 1 - Securities Lending

The Fund has appointed XXXX as its securities lending agent.

Market value of securities lent as at XX/XX/XXXX with corresponding cash and/or securities collateral:

Sub-fund	CCY	Borrower Name	Borrower Country	Market Value of securities lent	Cash collateral	Securities collateral
Sub-fund 1	EUR	Borrower 1	USA	XXXXX	XXXXX	XXXXX
		Borrower 2	Ireland	XXXXX	XXXXX	XXXXX
		Borrower 3	USA	XXXXX	XXXXX	XXXXX
		Borrower 4	United Kingdom	XXXXX	XXXXX	XXXXX
		Borrower 5	United Kingdom	XXXXX	XXXXX	XXXXX
		Borrower 6	United Kingdom	XXXXX	XXXXX	XXXXX
				XXXXX	XXXXX	XXXXX
Sub-fund 2	USD	Borrower 1	United Kingdom	XXXXX	XXXXX	XXXXX
		Borrower 2	United Kingdom	XXXXX	XXXXX	XXXXX

The security borrowers deliver cash collateral to XXX (US Dollars, Euro or Pound Sterling) or securities collateral to XXX or an appointed triparty custodian, to cover the related Fund sub-funds against a risk of default of such borrower.

As part of this securities lending program, the Fund has authorised XXX to invest cash collateral into reverse repurchase agreements/reverse repurchase agreements where XXX, acting as the Repo lender, receives from the Repo borrower financial debt instruments as collateral. The collateral of such Repo may only consist of highly rated debt securities issued or guaranteed by the US Government (or its agencies), by U.K. Government or by the Government of certain European countries.

In addition to the collateral received, XXXX does provide for an indemnification, covering any deficit in collateral should both, the borrower or the Repo-counterparty default.

For the year ended XX/XX/XXXX revenues arising from securities lending are as follows:

Sub-fund	CCY	Total gross amount of securities lending income	Direct and indirect costs and fees deducted from gross income				Total net amount of securities lending income	
			XXXX		XXAAA			
			Amount	% of gross	Amount	% of gross	Amount	% of gross
Sub-fund 1	EUR	XXXXXX	XXXXXX	XX	XXXXXX	XX	XXXXXX	XX
Sub-fund 2	USD	XXXXXX	XXXXXX	XX	XXXXXX	XX	XXXXXX	XX

XXXX and XXAAA receive fees out of the securities lending revenue. XXXX is an affiliate of the Fund's depository. XXAAA, providing administrative services in relation to the Fund's securities lending transactions, is a related party to the Fund's Management Company. The remainder of the revenue from the Fund's securities lending activities is received by the lending sub-funds.

Total net amounts of securities lending income are included in caption "Income on stock lending" in the Statement of Operations and Changes in Net Assets. *Cf Statement of Operations and Changes in Net Assets in Addendum*

ADDENDUM TO SFTR

Statement of Investments in Securities and Other Net Assets

Sub-fund 4

Number/Nominal	Description	Market Value [CCY]	% of Net Assets
Transferable securities and money market instruments admitted to official exchange listing			
Bonds			
XXXXX	Security description 1	XXXXX	XX
XXXXX	Security description 2	XXXXX	XX
Total Bonds		XXXXXX	XX
Shares			
XXXXX	Security description 1	XXXXX	XX
XXXXX	Security description 2	XXXXX	XX
Total Shares		XXXXXX	XX
Transferable securities and money market instruments admitted to official exchange listing		XXXXXX	XX
Total Investments in Securities		XXXXXX	XX
Cash at banks		XXXXXX	XX
Other net assets		XXXXXX	XX
Total net assets		XXXXXX	XX

ADDENDUM TO SFTR

Statement of Operations and Changes in Net Assets

	Sub-fund 1 EUR
Total net assets at the beginning of the year	xxxxx
Income	
Net dividends	xxxxx
Net interest on bonds	xxxxx
Net interest on banks	xxxxx
Net interest on derivatives	xxxxx
Other income	xxxxx
Income on stock lending	xxxxx
Expenses	xxxxx
Net interest on banks	xxxxx
Net interest on derivatives	xxxxx
Central administration fees	xxxxx
Depository bank fees	xxxxx
Investment management fees	xxxxx
Performance fees	xxxxx
Taxe d'abonnement	xxxxx
Transaction related costs	xxxxx
Net income/(loss)	xxxxx
Net realised gain/(loss) on:	
Securities	xxxxx
CFD	xxxxx
CDS	xxxxx
Futures	xxxxx
IRS	xxxxx
TRS	xxxxx
FET	xxxxx
Currencies	xxxxx
Net realised gain/(loss)	xxxxx

Change in unrealised gain/(loss) on:

Securities	xxxxx
CFD	xxxxx
CDS	xxxxx
Futures	xxxxx
IRS	xxxxx
TRS	xxxxx
FET	xxxxx
Currencies	xxxxx
Net increase/(decrease) in net assets as a result of operations	xxxxx

Movements in capital

Proceeds from shares issued	xxxxx
Payments for shares redeemed	xxxxx
Dividends paid	xxxxx

Total net assets at the end of the year	xxxxx
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Appendix 2: Guidance on remuneration disclosure in regards to UCITS V

The prospectus shall include either:

Law of 10 May 2016 transposing the Directive 2014/91/EU amending Directive 2009/65/EC (Art.69 (3)(a))

(a) the details of the up-to-date remuneration policy, including, but not limited to, a description of how remuneration and benefits are calculated, the identities of persons responsible for awarding the remuneration and benefits including the composition of the remuneration committee, where such a committee exists; or

(b) a summary of the remuneration policy and a statement to the effect that the details of the up-to-date remuneration policy, including, but not limited to, a description of how remuneration and benefits are calculated, the identity of persons responsible for awarding the remuneration and benefits, including the composition of the remuneration committee where such a committee exists, are available by means of a website – including a reference to that website – and that a paper copy will be made available free of charge upon request.

ESMA 2016/575

The annual report shall include (in an unaudited appendix / in the Activity report):

ESMA Q&A on application of the UCITS Directive (23/07/2018)

(a) the total amount of remuneration for the financial year, split into fixed and variable remuneration paid by the management company and by the UCITS to its staff or to the staff of the delegate¹² (for EU delegates) of the management company (or the UCITS when self-managed), and the number of beneficiaries, and where relevant, any amount paid directly by the UCITS itself, including any performance fee;

The disclosure should be done on a prorated basis for the part of the UCITS' assets which are managed by the identified staff within the delegate. The disclosure may be provided on an aggregate basis i.e. by means of a total amount for all the delegates of the management company in relation to the relevant UCITS.

(b) the aggregate amount of remuneration broken down by categories of employees or other members of staff as referred to in Article 14a(3);

(c) a description of how the remuneration and the benefits have been calculated;

(d) results of annual review of policy and implementation, including any irregularities that have occurred;

(e) material changes to the adopted remuneration policy.

Key investor information shall include:

A statement to the effect that the details of the up-to-date remuneration policy, including, but not limited to, a description of how remuneration and benefits are calculated, the identity of persons responsible for awarding the remuneration and benefits including the composition of the remuneration committee, where such a committee exists, are available by means of a website – including a reference to that website – and that a paper copy will be made available free of charge upon request.

¹². According to the cross-reference in Art 13 (1) b) of the SFTR to Art 22 AIFMD (being Art 20 of the Law of 12 July 2013 in Luxembourg) non-EU AIF selling only outside of the EU are not in scope of the disclosure requirements of Art 13 SFTR.

Appendix 3: Disclosure requirements for AIFs (AIFMD)

The annual report shall include (in an unaudited appendix / in the Activity report):

The information of the AIFMD under section “Management and administration of the Fund”

A report of the activity of the fund of the financial year, including

- The overview of investment activities during the year/period and overview of the AIF's portfolio at year-end/period-end.
- The overview of AIF performance over the year/period.
- The description of any material changes¹³ in the information, listed in Art. 23 of the Directive / Art. 21 of the Luxembourg Law 12 July 2013, to be provided to investors prior to investing, if any.
- Remuneration disclosures including a general description relating to the financial and non-financial criteria of the remuneration policies and practices as well as the following:
 - > the total remuneration for the financial year split into fixed¹⁴ and variable, paid by the AIFM to its entire staff, indicating the number of beneficiaries;
 - > the total remuneration of those staff of the AIFM who are fully or partly involved in the activities of the AIF, indicating the number of beneficiaries;
 - > the proportion of the total remuneration of the staff of the AIFM attributable to the AIF, indicating the number of beneficiaries and
 - > the aggregate amount of remuneration broken down by senior management and members of staff of the AIFM whose actions have a material impact on the risk profile of the AIF.

In its AIFMD Q&A updated 4 December 2019, ESMA confirmed that the remuneration-related disclosure requirements are also applicable to the staff of the delegate of an AIFM to whom portfolio management or risk management activities are delegated. It further confirmed that all remuneration disclosures must be included in the AIF's annual report.

While not required to be included in the annual reports, AIFMs may use the AIF's annual report to include the following required periodical disclosures to investors:

- the percentage of the AIF's assets which are subject to special arrangements arising from their illiquid nature;
- any new arrangements for managing the liquidity of the AIF;
- the current risk profile of the AIF and the risk management systems employed by the AIFM to manage those risks
- AIFMs managing EU AIFs employing leverage or marketing in the Union AIFs employing leverage shall, for each such AIF disclose:
 - > any changes to the maximum level of leverage which the AIFM may employ on behalf of the AIF as well as any right of the reuse of collateral or any guarantee granted under the leveraging arrangement
 - > the total amount of leverage employed by that AIF.

¹³. Any changes in information shall be deemed material if there is a substantial likelihood that a reasonable investor, becoming aware of such information, would reconsider its investment in the AIF, including because such information could impact an investor's.

¹⁴. Fixed remuneration consists of salaries paid, pension contributions as well as other non-monetary benefits such as car remuneration disclosure may be omitted until the 1st full performance period after the AIFM becomes authorised.

Appendix 4: Foreign distribution - overview of specific additional information to be included in the annual report of Luxembourg funds

Country of sale	Hong Kong	Switzerland
Content of the annual report	Appendix E of the Hong Kong Code on Unit Trusts and Mutual Funds of January 2019	SFAMA Guidelines of 16/05/2008 (status 20/04/2015)
Details of the local paying and information agent/ representative	Recommended	YES
List of changes (purchases/sales) made to the portfolio	YES	YES
Mention of "Are calculated in accordance with SFAMA (Swiss Funds & Asset Management Association) registration"	NO	YES
Trailer fees and rebates (if institutional investors)	NO	YES
Specific information to disclose in case of partial registration (for umbrella funds, when all sub-funds are not registered for distribution in one country)	YES	YES
Transactions with related parties	YES	NO
Soft commission arrangements	YES	NO
Net returns %	YES The last 10 financial years, showing the highest issue price and the lowest redemption price of the shares	YES
Total Expense Ratio ("TER")	NO	YES
Portfolio Turnover ("PTR")	NO	NO
Derivatives usages and investments	YES	NO
Securities financing and borrowing transactions	YES	NO
Collateral holdings	YES	NO
Soft dollar arrangements	YES	NO
Transaction costs	YES	NO

Appendix 5: Illustrative country specific disclosure

1. Information for investors in Hong Kong

Guidance:

Law applicable: Law applicable: Code on Unit Trusts and Mutual Funds dated June 2010 ("the Code") (Appendix E) as amended in January 2019

Supervisory Authority: Securities and Futures Commission (SFC)

Fund type under scope: All collective investment schemes (except hedge funds, REITs, funds publicly traded on the Hong Kong Stock Exchange and mandatory provident funds)

While the SFC acknowledges that financial reports of recognised jurisdiction schemes will vary in content, financial reports are expected to offer investors comparable disclosure as set out in the appendix E of the Code. Although financial **reports of recognised jurisdiction schemes will generally be reviewed on the basis that they already comply in substance with the appendix E of the Code, disclosure must be made of transactions with connected persons (the term "connected person" is defined in the Code. However we can also see that the term "related parties" is used to describe this concept) and soft dollar arrangements.** The SFC reserves the right to require additional disclosure. (Extract of the appendix E of the Code)

Specific disclosure requirements:

Information on soft dollar arrangements:

- Statement on the existence of soft dollar arrangements or a nil statement
- General description on soft dollar arrangements
 - Amounts of transactions executed;
 - Related commissions that have been paid for the transactions;
 - Description of goods and services received by the Management Company of Investment delegate.

Information on related parties' transactions needs also to be inserted in the notes to the annual report.

In addition, some supplementary information, listed below, needs to be inserted.

- name and address of the Hong Kong representative (to be inserted under section "Management and administration of the fund");
- where the scheme has paid or proposes to pay an interim dividend, the amount of dividend should be disclosed;
- in case of partial registration:

A list of the sub-funds authorised for public distribution in Hong Kong must appear stating that the remaining ones are not authorised and not available to Hong Kong investors.

Luxembourg is a recognised jurisdiction in the meaning of the Code issued by the SFC. In practice, even if appendix E of the Code makes reference to specific disclosure to be enclosed in the fund's annual report such as:

- comparative figures for the last 3 years for the total net asset value and the net asset value per share/unit;
- a ten-year performance table (see previous page).

Luxembourg funds generally do not disclose this information. Nevertheless, if the Fund is authorised for public distribution in Hong Kong, we advise cross-checking information available in the Luxembourg annual report with the appendix E of the Code to ensure that the main Hong Kong required information is included in the Luxembourg annual report. The SFC reserves the right to require disclosure in addition to the ones specified above.

Wording suggestion

Note related to “soft dollar” arrangements

Guidance:

This information is only mandatory for funds authorised for public distribution in Hong Kong. Where only certain sub-funds are distributed in Hong Kong, disclosure can be limited to these with a clear indication that soft dollar arrangements are only disclosed for sub-funds distributed in Hong Kong.

Sub-funds other than [name of the sub-fund] are unauthorised by the Securities and Futures Commission in Hong Kong and not available to Hong Kong residents.

Certain investment advisers have entered into soft commission arrangements with brokers under which certain goods and services used to support investment decision making were received by the investment advisers. The investment advisers do not make direct payment for these services but transact an agreed amount of business with the brokers on behalf of the fund:

- [Amounts of transactions executed]

Commissions are paid from the fund for these transactions:

- [Related commissions that have been paid]

The goods and services utilised by the Fund include: portfolio valuations, accounting and performance measurements, service price information, price histories and charts, research: risk, analysis, asset allocation; qualitative analysis, execution services; market information as specialised services. All of these are included in the Hong Kong Securities and Futures Commission’s list of approved goods and services.

Investment advisers who have arranged soft commissions are:

- [investment advisor name]

and concern the following sub-funds:

- [name of the sub-fund] – [name of the sub-fund]

or

For the year ended [closing date], no soft dollar arrangements were in place for the following sub-funds:

- [name of the sub-fund] – [name of the sub-fund]

Guidance:

Where no soft dollar arrangements were in place during the year then ended, a nil statement has to be inserted.

Note related to transactions with related parties

Guidance:

This information is only mandatory for funds authorised for public distribution in Hong Kong. Where only certain sub-funds are distributed in Hong Kong, disclosure can be limited to these with a clear indication that transactions with related parties arrangements are only disclosed for sub-funds distributed in Hong Kong.

[There has been no transaction on investment portfolio conducted with related parties].

Or

When arranging transactions of securities and/or derivatives for the Fund, related parties may have provided securities, brokerage, foreign exchange banking and other services or may have acted as principal on their usual terms and may benefit from them. Commissions have been paid to brokers and agents in accordance with the relevant market practice and the benefit of any bulk or other commission discounts provided by brokers or agents has been passed on to the Fund. The services of related parties (including broker dealers) were used by the investment advisers where it was considered appropriate to do so and provided that their commissions and other terms of business are generally comparable with those available from unassociated brokers and agents in the markets concerned, and that is consistent with the above policy of obtaining best results.

During the year there have been no transactions which were outside the ordinary course of business or which were not on normal commercial terms. The total aggregate value of transactions effected through related parties was [CCY amount]. The percentage of such transactions in value compared to the total transactions during the year amounted to [percentage] and the brokerage commission paid in relation to these transactions totaled [CCY amount]. The average rate of commission so paid was [percentage].

2. Information for investors in Switzerland

Regulations applicable:	The CISA (Collective Investment Scheme Act) of 23 June 2006 (Status as of 1 June 2016) and CISO (Collective Investment Scheme Ordinance) of 22 November 2006 (Status as of 1 January 2015) The Swiss Funds and Asset Management Association (SFAMA) guidelines on the calculation and disclosure of the Total Expense Ratio ("TER") of collective investment schemes dated 16 May 2008 (amended on 20 April 2015). The SFAMA guidelines on the calculation and publication of performance data of collective investment schemes dated 16 May 2008 (amended on 1 July 2013). The SFAMA guidelines on transparency on duties regarding the charging and use of fees and costs dated 22 May 2014.
Supervisory Authority:	Swiss Financial Market Supervisory Authority (FINMA) working closely with the SFAMA
Funds under scope:	Collective investment schemes
Disclosure requirements:	<ul style="list-style-type: none">•the annual report must be in a Swiss official language (French, Italian or German);•name and address of the Swiss representative (and paying agent);•name and address of the Swiss paying agent (if different from Swiss representative);•indication that the list of changes in portfolio (purchases/sales) is available free of charge at the Swiss representative;•indication that the documentation (Articles of association/Management regulations, prospectus, Key Investor Information Document (KIID), annual and semi-annual report, information on management fees) of the fund is available free of charge at the Swiss representative;•management fee related to retrocessions and trailer fees ("Commissions d'état") to institutional investors and sales partners– revised guidelines will be published soon;•TER or synthetic TER (with the introduction of the KIID and the new ongoing charge figure, the SFAMA aims to equalise the TER to such ongoing charge figure;•performance of sub-funds. <p>In case of partial registration</p> <p>The annual report of umbrella funds cannot include information regarding sub-funds not registered with the FINMA. Indeed, such disclosure is considered as unauthorised promotion of these sub-funds in Switzerland. However, consolidated accounts can be maintained in the report even if the consolidated accounts contain figures related to un-registered sub-funds. It is not allowed to mention the name of the sub-funds not registered in Switzerland under the consolidated accounts. As a consequence, a Swiss specific version of the annual report needs to be prepared.</p>

Wording suggestion

The Swiss representative (and paying agent) is [name] (to be inserted under section "Management and administration of the fund"):

The Swiss paying agent (if different from Swiss representative) is [name] (to be inserted under section "Management and administration of the fund"):

The full prospectus, the KIIDs as well as the articles of association/management regulations of the fund, the annual and semi-annual reports and the list of changes in the portfolios during the reference year can be obtained free of charge at the registered office of the Swiss representative.

In case of partial registration (for umbrella funds)

Guidance:

All references to sub-funds not authorised in Switzerland have to be removed from the report filed with the Swiss authority, except in the consolidated accounts, in which the following remark has to be added.

As at year-end, the following sub-funds were authorised for distribution (in and) outside Switzerland:

- [name of the sub-fund]
- [name of the sub-fund]
- [name of the sub-fund]

Management fees (to be tailored based on each situation)

Guidance:

- As a transitional rule/arrangement, in case the prospectus does not yet disclose the retrocessions and trailer fees to institutional investors and sales partners respectively as required by the transparency requirements with regard to management fees of the SFAMA of 22 May 2014, the following disclosure must be included in the annual report.
- If the fund's regulations state a maximum percentage, the management fee percentage effectively applied is to be disclosed in the annual and semi-annual reports.

Payments/compensations (trailer fees) are paid out from the management fee for the distribution/marketing of the investment fund to distributors and asset managers. Reimbursements/rebates are granted out of the management fee to institutional investors who hold the fund shares for the economic benefit of third parties.

TER or synthetic TER as follows:

– TER

Guidance:

- If the fund charges different costs and commissions to individual share classes, a separate TER is to be calculated for each share class.
- If a performance-related fee is paid to the asset manager, this remuneration is to be included in the TER and stated separately as a percentage of the average NAV.

Guidance:

General TER (calculated for the preceding 12 months at the date of the annual report; for more information please refer to the applicable SFAMA guidelines on the calculation and disclosure of the TER of the collective investment schemes)

$$\text{TER \%} = \frac{\text{total operating expenses (including performance fee, excluding, amongst other, bank interest, transaction costs, formation expenses, etc...) in CCY}}{\text{average NAV in CCY}} \times 100$$

CCY = currency units in the accounting currency of the collective investment scheme in the TER and stated separately as a percentage of the average NAV.

Sub-fund	Share Class	CCY	TER	Performance fee in % of total NAV
(insert appropriate information)	(insert appropriate information)	(insert appropriate information)	(insert appropriate information)	

TER was calculated in accordance with the applicable SFAMA guidelines.

– Synthetic TER

*SFAMA
guidelines dated
16 May 2008
(status 20 April
2015)*

Guidance:

If a fund invests at least 10% of its NAV in target funds which publish a TER with the meaning of the SFAMA guidelines, a composite (synthetic) TER of the fund of funds is to be calculated as of the closing date of the financial year. This corresponds to the sum of:

- the TER of the individual target fund, weighted on the basis of their proportion in the NAV of the fund of funds as of the closing date;
- the subscription and redemption commissions of the target funds actually paid;
- the TER of the fund of funds minus the reimbursements received from the target funds during the reporting period.

Sub-fund	Share Class	CCY	Synthetic TER	Performance fee in % of total NAV
(insert appropriate information)	(insert appropriate information)	(insert appropriate information)	(insert appropriate information)	

*SFAMA
guidelines dated
16 May 2008
(status 20 April
2015)*

Guidance:

In case a significant proportion of target funds does not publish their TER, and therefore synthetic TER is impossible to compute, a specific sentence needs to be inserted.

As the fund invests a significant portion of its NAV in target funds which do not publish a TER, no TER is calculated and published.

Synthetic TER was calculated in accordance with the applicable SFAMA guidelines.

Performance of the sub-funds and respective share classes

Guidance:

Historical performance data by share class must be published for the following observation years at least:

- for last calendar year separately, and
 - either
 - for the last three calendar years, or
 - for the last five calendar years, or
 - since the launch of the fund either
 - for each year separately, or
 - as a cumulative total figure for a number of calendar years, or
 - as an annual average for a number of calendar years
- The currency in which the performance is calculated must be clearly visible.

Each time performance data are published, mention of the following facts must be made:

- past performance is no indication of current or future performance, and
- the performance data do not take into account the commissions on the issue and redemption of shares This disclaimer must be clearly visible.

Calculation method:

$$\text{Performance \%} = (\text{NAV end P} \times f_1 \times f_2 \dots f_n / \text{NAV start P}) - 1 \times 100$$

NAV end P = net asset value per share at the end of observation period

NAV start P = net asset value per share at the start of observation period (i.e. the last figure for the preceding observation period)

f1, f2...fn = adjustment factors for distribution during the reference period, where:

$$f = (\text{NAV ex} + \text{gross distribution}) / \text{NAV ex}$$

NAV ex = net asset value per share as at ex dividend date

Gross distribution = gross amount of income and capital gains distributed per share to investors in Switzerland.

Example of disclosure: for each year separately

	Last cal. year (N-1)	N-2	N-3	N-4
Sub-fund/share-class				
Benchmark				

Example of disclosure: as annual average

	Last cal. year (N-1)	N-3 to N-1	Or N-5 to N-1
Sub-fund/share-class			
Benchmark			

Past performance is not an indication of the current or future performance.

The performance data do not take into account the commissions on the issue and redemption of shares.

Performance figures were calculated in accordance with the applicable SFAMA guidelines.

Appendix 6: Additional information on specific requirements when filing annual reports with local authorities

Filing deadline and language requirements for UCITS

According to article 94 c) of the UCITS IV Directive (2009/65/CE), information or documents other than key investor information referred to in Article 78 of the above mentioned directive shall be translated, at the choice of the UCITS, into the official language, or one of the official languages, of the UCITS host Member State, into a language approved by the competent authorities of that Member State or into a language customary in the sphere of international finance.

Therefore except when it is clearly mentioned in the table below, host Member State regulators usually accept English.

Content of the report Country of sale	Filing deadline with the local authority	English acceptable (yes/no)? If not which languages are required?	Regulatory authority
Austria	4 months from fund year-end	Yes (German language also acceptable)	FMA, Österreichische Finanzmarktaufsicht www.fma.gv.at
Belgium	4 months from fund year-end	Yes according to FSMA circular 2013-05 paragraph 5.2 dated 14/02/2013 (German, French and Dutch languages also acceptable)	FSMA, Financial Services and Markets Authority www.fsma.be
Bulgaria	Within 90 days from the time of storing of the records (according to Art. 60. (1) 1. of the Collective Investment Schemes and Other Undertakings for Collective Investments Act)	Yes. Information may be provided at the choice of the collective investment scheme in Bulgarian or in English (according to Art. 131. (2) of the Collective Investment Schemes and Other Undertakings for Collective Investments Act)	FSC, Financial Supervision Commission www.fsc.bg
Cyprus	4 months from fund year-end	Yes according to CI78-2012-01 (Greek language also acceptable)	CySEC, Cyprus Securities and Exchange Commission www.cysec.gov.cy
Czech Republic	4 months from fund year-end	Yes (Czech language also acceptable)	CNB, Czech National Bank www.cnb.cz
Denmark	4 months from fund year-end	Yes (Danish, Swedish and Norwegian languages also acceptable)	Finanstilsynet www.dfsa.dk
Estonia	4 months from fund year-end	Yes (Estonian language also acceptable)	Finantsinspektsioon www.fi.ee
Finland	4 months from fund year-end	Yes (Finnish and Swedish languages also acceptable)	Finanssivalvonta www.finanssivalvonta.fi
France	4 months from fund year-end	Yes (French language also acceptable)	AMF, Autorité des Marchés Financiers www.amf-france.org

Germany	4 months from fund year-end	Yes (German language also acceptable)	BaFin, Bundesanstalt für Finanz- dienstleistungsaufsicht www.bafin.de
Gibraltar	4 months from fund year-end	Yes	FSC, Financial Services Commission www.fsc.gi
Greece	4 months from fund year-end	Yes Article 90 of L. 4099/2012. (Greek lan- guage also acceptable)	HCMC, Hellenic Capital Market Commission www.hcmc.gr
Hong Kong	4 months from fund year-end	Yes	SFC, Hong Kong Securities and Futures Commission www.sfc.hk
Hungary	4 months from fund year-end	Yes (Hungarian language also acceptable - according to Section 119 of the Act XVI of 2014 on Collective Investment Trusts and Their Managers, and on the Amendment of Financial Regulations)	MNB, The Central Bank of Hungary www.mnb.hu
Iceland	4 months from fund year- end (no confirmation under UCITS IV)	Yes	Icelandic Financial Supervisory Authority www.fme.is
Ireland	4 months from fund year-end	Yes	CBI, Central Bank of Ireland www.centralbank.ie
Italy	Not required	Yes	CONSOB, Commissione Nazionale per le Società e la Borsa www.consob.it
Latvia	No specific deadline. Market practice: 4 or 7 months from fund year-end	Yes (Latvian language also acceptable)	FCMC, Financial and Capital Market Commission www.fktk.lv/en/
Lithuania	4 months from the fund year-end	Yes (Lithuanian language is also acceptable)	Bank of Lithuania www.lb.lt
Malta	10 months and 42 days from fund year-end	Yes	MFSA, Malta Financial Services Authority www.mfsa.com.mt
Netherlands	Not required	Yes (Dutch language is also acceptable)	AFM Autoriteit Financiële Markten www.afm.nl

Norway	No specific deadline. Market practice: 4 months from fund year-end	Yes (Norwegian, Swedish or Danish languages are also acceptable)	Finanstilsynet www.finanstilsynet.no
Poland	4 months from fund year-end	Yes (Polish language also acceptable)	KNF, Polish Financial Supervision Authority www.knf.gov.pl/en/
Portugal	4 months from fund year-end	Yes as confirmed informally by CMVM based on the guidelines already published (no law issued for the moment)	CMVM, Portuguese Securities Market Commission www.cmvm.ptv
Romania	4 months from fund year-end	Yes according to Article 175 (1) of G.E.O. 2012/32 as subsequently amended and supplemented	ASF, Autoritatea de Supraveghere Financiară https://asfromania.ro/en/
Singapore	Not required for restricted scheme 4 months from fund year-end in case of distribution to retail	Yes	MAS, Monetary Authority of Singapore www.mas.gov.sg
Slovakia	4 months from fund year-end	Yes (Slovak language also acceptable)	NBS, National Bank of Slovakia www.nbs.sk
Slovenia	4 months from fund year-end	Yes (Slovenian language also acceptable).	ATVP, Securities Market Agency www.atvp.si
Spain	Not required	Yes	CNMV, Comisión Nacional del Mercado de Valores www.cnmv.es
Sweden	Not required	Yes (Swedish language also acceptable)	Finansinspektionen www.fi.se
Switzerland	4 months from fund year-end	No. The report must be in one of the Swiss official language (i.e German or French or Italian).	FINMA, Swiss Financial Market Supervisory Authority www.finma.ch
Taiwan	4 months from fund year-end	No - Chinese language is required	SFB, Financial Supervisory Commission www.sfb.gov.tw
United Kingdom	4 months from fund year-end	Yes	FCA Financial Conduct Authority www.fca.org.uk

According to article 75(1) of the UCITS IV Directive (2009/65/CE), the latest published annual report shall be provided to investors on request and free of charge. Therefore in all countries of distribution, even in the ones where the filing of the annual report is mandatory (as clearly mentioned in the table above), latest annual report shall be made available to investors upon request.

Filing deadline and language requirements for UCITS

1. Denmark

Financial reports must be in English, Danish, Swedish or Norwegian. There is no requirement that the financial reports of foreign UCITS registered in Denmark are filed with the Danish authority. However the financial reports must be made available to Danish investors at the Danish representative agent or at their request.

2. Italy

There is no obligation to file the annual report with the Italian authorities. The notification to CONSOB concerning the financial report is considered as fulfilled after publication on the client's website. The Italian information agent, the paying agent (if any) and the distributor(s) must hold the financial reports available for investors.

3. Spain

There is no obligation to file the annual report with the Spanish authorities. However, the financial reports must be made available to investors and to the Spanish authorities upon request at the distributor(s) and at the local information agent (as appointed according to CNMV Circular 2/2011 dated 9 June 2011).

4. Netherlands

Financial reports must be in English or Dutch. There is no requirement that the financial reports of foreign UCITS registered in the Netherlands are filed with the Dutch authority.

However, the financial reports must be made available to Dutch investors.

5. Sweden

Financial reports must be in English or Swedish. There is no requirement that the financial reports of foreign UCITS registered in Sweden are filed with the Swedish authority.

However, the financial reports must be made available to Swedish investors at the Swedish paying and information agent.

Filing deadline requirement for AIF is 6 months.

Appendix 7: Glossary

ALFI	Association of the Luxembourg Fund Industry
CCY	Currency
CSSF	Commission de Surveillance du Secteur Financier, Luxembourg supervisory authority
ESMA	European Securities and Markets Authority
FCP	Fonds Commun de Placement
FIFO	First in first out
Financial reports	Annual and semi-annual reports
GAAP	Generally Accepted Accounting Principles
IML	Institut Monétaire Luxembourgeois, former name of Luxembourg supervisory authority, replaced by the CSSF in 1998
NAV	Net Asset Value
PTR	Portfolio Turnover Ratio
SICAV	Société d'Investissement à Capital Variable
Synthetic TER	Applicable to fund of funds only. TER including expenses borne by the fund and also expenses borne at target fund level
TER	Total Expense Ratio
UCITS	Undertakings for Collective Investment in Transferable Securities: fund compliant with the UCITS Directive 85/611/EEC amended by the 2001/107/EEC and 2001/108/EEC Directives. They correspond to funds compliant with requirements defined in part I of the amended Luxembourg Law of 17 December 2010
VaR	Value at Risk
AIF	Alternative Investment Funds
SFTR	Securities Financing Transactions Regulation

PwC Luxembourg contacts



Oliver Weber
Luxembourg Asset and Wealth
Management Leader
oliver.weber@lu.pwc.com
+352 49 48 48 3175



Steven Libby
EMEA Asset and Wealth Management
Leader
steven.libby@lu.pwc.com
+352 49 48 48 2116



Michael Delano
Assurance Asset and Wealth
Management Leader
michael.delano@lu.pwc.com
+352 49 48 48 2109



Christophe Saint-Mard
Global Fund Distribution Leader
christophe.saint-mard@lu.pwc.com
+352 49 48 48 2134



François Généaux
Asset and Wealth Management
Advisory Leader
francois.genaux@lu.pwc.com
+352 49 48 48 4175



Olivier Carré
Asset and Wealth Management
Regulatory Compliance Leader
olivier.carre@lu.pwc.com
+352 49 48 48 4174



Sandrine De Landtsheer
Head of Asset and Wealth
Management Reporting
sandrine.delandtsheer@lu.pwc.com
+352 49 48 48 5112



Dariush Yazdani
Head of Market Research Centre
dariush.yazdani@lu.pwc.com
+352 49 48 48 2191

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PricewaterhouseCoopers
2, rue Gerhard Mercator
B.P. 1443
L-1014 Luxembourg
Tel: +352 49 48 48 1
Fax: +352 49 48 48 2900
www.pwc.lu



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