

On 24 March 2023, the *Commission de Surveillance du Secteur Financier* (“CSSF”), published a *communiqué* announcing the extension of its data collection exercise related to SFDR which started in February 2023. The objective of this second phase is to collect, in a digital format, the information contained in precontractual disclosure documents/templates notably for sub-funds of Luxembourg-domiciled UCITS and AIFs managed by any IFM based in Luxembourg and in some cases in other EU Member States.

In addition to the need of completing the reporting by **31 October 2023**, IFMs will be responsible for filing any subsequent changes with the CSSF and the data collection exercise will be extended to collect information contained in the PAI statements and in the periodic disclosure templates, making the CSSF reporting a recurrent exercise.

## Who is in scope?

### IFMs

UCITS management companies based in Luxembourg or another Member State

Authorized AIFMs based in Luxembourg

Authorized AIFMs based in another Member State

Registered AIFMs based in Luxembourg or another Member State

### Products

All Luxembourg-domiciled UCITS

All Luxembourg-domiciled regulated and unregulated AIFs (including ELTIFs)

All Luxembourg-domiciled regulated and unregulated AIFs (only when they qualify as ELTIFs)

All Luxembourg-domiciled regulated AIFs

## What to report?



For each sub-fund disclosing under Art.6, 8 and 9 SFDR:

- **SFDR-related information** contained in the pre-contractual documents/templates
- **Confirmation on other more general SFDR aspects** beyond that in the pre-contractual documents/templates

## In what format? *Two options*



- Manually answering one **questionnaire on eDesk** for each sub-fund; **OR**
- Preparing a **single JSON file** covering all sub-funds off line and **file it at once** with the CSSF through an S3 protocol.

## When to report?



- **Initial report** to be submitted by **31 October 2023**
- **Subsequent reports** to be submitted **each time the information** in the pre-contractual document reflected in the previous report is **modified**.

## Who can submit?



Using the manual process on eDesk, the information must be submitted by an individual authorized by the IFM duly enrolled with a LuxTrust ID. Using the bulk submission process with JSON files, the information can be submitted by anyone with an appropriate digital certificate through an S3 protocol.

## How can Arendt help?

- Using our web-based “Client Dashboard” application, we can ensure that we instantly transfer the content of your SFDR disclosures into a CSSF compatible JSON format.
- Subject to receiving some documents (such as notably the SFDR pre-contractual template) we can completely handle the preparation of the adequate JSON files on the Client Dashboard in view of CSSF filing (while also giving you “read-only” access to the tool to confirm the data prepared).
- Access to our platform is not subject to CSSF acceptance or Luxembourg Luxtrust ID making it very easy for the relevant teams (internally or externally) to have access to the data encoded in the platform for the initial CSSF reporting. Such data can then easily be re-accessed and reused at any given time in the future for subsequent filings, whereas the information encoded directly on the CSSF eDesk is not reusable.
- Taking advantage of the JSON format allows to perform a single filing for multiple sub-funds at once instead of making the filing manually per sub-fund on the CSSF eDesk, therefore significantly enhancing the process’ efficiency
- Leveraging on our extensive CSSF reporting experience we handle the filing of the JSON files and the CSSF feedbacks until approval.
- Our service also extends to the previously enforced entity-level CSSF SFDR data collection exercises (level I) and other future anticipated versions (i.e., entity-level PAI reporting) as the tool could accommodate for different types of questionnaires.

## More about Arendt’s Client Dashboard

A powerful web-based application providing access to IFMs on up-to-date regulatory information for fund registration, distribution and ESG matters. The tool includes a document library and other key functionalities to facilitate compliance with key regulatory aspects. Access to the Dashboard can be granted to every party involved in the regulatory compliance process without any restriction.

Contact us if you wish to organize a demo to discover its main features and how it can simplify the CSSF data collection exercise process.

If you need more information, please contact us at [esg.arc@arendt.com](mailto:esg.arc@arendt.com)