

FINNIUS

Reporting obligation for non-EU AIFMs as of Q1 2023

11 November 2022

 1 MINUTE

Notified managers of alternative investment funds (*Alternative Investment Fund Managers*, **AIFMs**) and funds from outside the EU are currently exempt from certain reporting obligations under the Alternative Investment Funds Managers Directive (**AIFMD**) in the Netherlands.

However, the AFM has recently indicated that this exemption will soon expire. Non-EU AIFMs will be obliged to report to the AFM with effect from Q1 2023 and submit their first reports in April 2023.

To be able to submit these reports, a non-EU AIFM should have an AFM Portal account. The AFM has published information on how a non-EU AIFM should apply for login details ([link](#)) and on how a non-EU AIFM can submit the relevant reports via the AFM Portal ([link](#)).

The AFM will also supervise data quality. The AFM, together with ESMA, will annually review the data quality of the fund reports by means of a Data Quality Engagement Framework (**DQEF**) review. These reviews identify inconsistencies in the reporting that are probably due to reporting errors. The AFM has indicated that the reports submitted in 2023 will not be subject to a DQEF review.

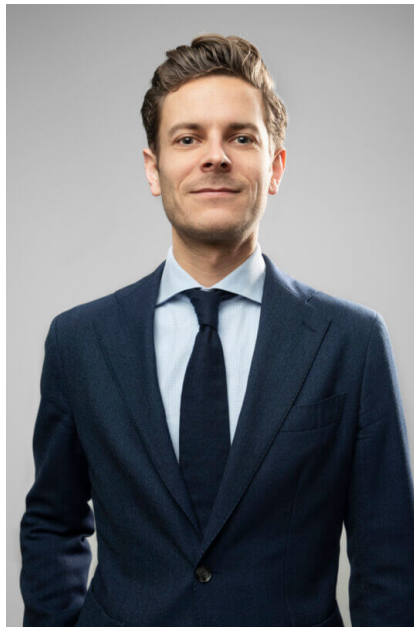
It is important that the non-EU AIFMs will start to prepare for this additional reporting obligation.

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