FUNDSQUARE

e-file.lu

How to manage the Key Investor Information Document on the Fundsquare platform

How to prepare the Annual KIID update

Contents

1   Introduction

1.1 Purpose of the document

In the light of the annual KIID update, we would like to remind you about some of the tools that are available to you. Those tools can help you to successfully prepare the NCA update packages for any public and regulatory required document in particular the KIID. Although more dashboards are available, this note will only point toward those, that we recommend as the most suitable for the annual update.

These suggestions should only be considered as guidance and do not represent a complete list in preparation of the annual KIID update tests.

1.2 Acronyms and abbreviations

Term	Description
CLM	Country Language Matrix
DDS	Document Dissemination Service
DHS	Document Hosting Service
FSQ	Fundsquare
HTML	HyperText Markup Language used to create web pages
KIID	Key Investor Information Document
KIID Factory	Service provider that produces KIIDs
NCA	National competent authority (usually the regulator)
Notification light	Registration of an additional shareclass in an already passported subfund
Package	Email including KIIDs, either for a KIID update filing or a light notification
sFTP	Secure File Transfer Protocol
XML	Extensible Markup Language

2 Annual KIID update preparation

2.1 General

We suggest that these tasks should be carried out ahead of the upload of the annually updated KIIDs are uploaded into the document library.

2.2 Check the CSSF code mapping and missing share classes

For a filing to the CSSF, each ISIN/share class in the FSQ database has to be mapped to the correct CSSF code. Dashboard 1_1 Fund comparison between Fundsquare and CSSF shows the static data information at the CSSF and at FSQ. Each active share class at the CSSF must have a matching share class at FSQ :

CSSF												Fundsquare							
Fund name	Fund code	Subfund name	Subfund code	ShareClass name	ShareClass code	ISIN	DtDebValid	DtFinValid	Status	Cssf code		Cssf code	ID	ISIN	Fund name	Subfund name	ShareClass name	Finesti name	ShareLaunchDate(SynchroCssf)	FinestiStatus#1
INVESTMENT FUNDS	555	INCOME FUND	97	A	01		10/09/2014		Active	531/97/01		555/97/01	12327 / 135999 / 136280	LU1135359625X	INVESTMENT FUNDS	INCOME FUND	A Capitalisation	Investment Funds Income Fund A	30/09/2014	Active
INVESTMENT FUNDS	555	INCOME FUND	97	AR	03		07/11/2014		Active	531/97/03		555/97/03	12327 / 135999 / 202944	LU1134359625X	INVESTMENT FUNDS	INCOME FUND	AR Distribution	Investment Funds Income Fund AR	07/11/2014	Active
INVESTMENT FUNDS	555	INCOME FUND	97	B	04		07/11/2014		Active	531/97/04		555/97/04	12327 / 135999 / 136284	LU1134359625X	INVESTMENT FUNDS	INCOME FUND	B Capitalisation	Investment Funds Income Fund B	07/11/2014	Active
INVESTMENT FUNDS	555	INCOME FUND	97	BR	05		07/11/2014		Active	531/97/05	E	555/97/05	12327 / 135999 / 136288	LU1235359625X	INVESTMENT FUNDS	INCOME FUND	C Capitalisation	Investment Funds Income Fund BR	07/11/2014	Active
INVESTMENT FUNDS	555	INCOME FUND	97	C	06		07/11/2014		Active	531/97/06		555/82/01	12327 / 135999 / 202947	LU1235359625X	INVESTMENT FUNDS	INCOME FUND	CR Distribution	Investment Funds Income Fund C	07/11/2014	Active
INVESTMENT FUNDS	555	INCOME FUND	82	A	01		15/04/2008	01/10/2018	Inactive	531/97/07	W		12327 / 135999 / 136297	LU1535359635X	INVESTMENT FUNDS	INCOME FUND	NR Capitalisation	Investment Funds Income Fund A	08/11/2014	Active

Please check for errors **E** (e.g. active share classes at the CSSF without a matching share class at FSQ) or warnings **W** (e.g. different statuses between the CSSF and FSQ). Please note that the codes have to be provided to ReferentialData@fundsquare.net by the client or his serviceprovider.

2.3 Check the Regulator CLM and scope of the filing

For every NCA and country where a document filing has to be done, at least one language has to be defined in the Regulator (NCA) CLM, per document type and for each investment fund. Dashboard 0_1 – Country/Language matrix (tab "Efile - Regulator Transmission") should be used to verify the Regulator (NCA) CLM.

Country language matrix - Regulator Transmission								
Client configuration								
Company name	Fund Name	Country Cd ISO	Country Name	Lang. Cd ISO	Language	Specific Country Cd ISO	Specific Country Name	Document Type
Asset Manager Ltd	AM1 Funds	AT	Austria	DE	German			Key Investor Information (KII)
Asset Manager Ltd	AM1 Funds	BE	Belgium	FR	French			Key Investor Information (KII)
Asset Manager Ltd	AM1 Funds	CH	Switzerland	DE	German	CH	Switzerland	Key Investor Information (KII)
Asset Manager Ltd	AM1 Funds	GB	United Kingdom	EN	English			Key Investor Information (KII)
Asset Manager Ltd	AM1 Investment Funds	DK	Denmark	DA	Danish			Key Investor Information (KII)
Asset Manager Ltd	AM1 Investment Funds	EE	Estonia	ET	Estonian			Key Investor Information (KII)
Asset Manager Ltd	AM1 Investment Funds	ES	Spain	ES	Spanish			Key Investor Information (KII)
Asset Manager Ltd	AM1 Investment Funds	GB	United Kingdom	EN	English			Key Investor Information (KII)
Asset Manager Ltd	AM1 Strategy Fund	LU	Luxembourg	EN	English			Key Investor Information (KII)
Asset Manager Ltd	AM1 Strategy Fund	HU	Hungary	HU	Hungarian			Key Investor Information (KII)
Asset Manager Ltd	AM1 Funds	LU	Luxembourg	EN	English			Prospectus
Asset Manager Ltd	AM1 Investment Funds	LU	Luxembourg	EN	English			Prospectus
Asset Manager Ltd	AM1 Strategy Fund	LU	Luxembourg	EN	English			Prospectus

For example, for AM1 Funds, line one defines German as language for a KIID filing to Austria. Line three defines the Swiss specific KIID in German (DE-CH) for the KIID filing to Switzerland. The last three lines have defined, for each of the three funds, English as filing language for the prospectus to the CSSF.

2.4 "Clean-up" of existing KIIDs in the library

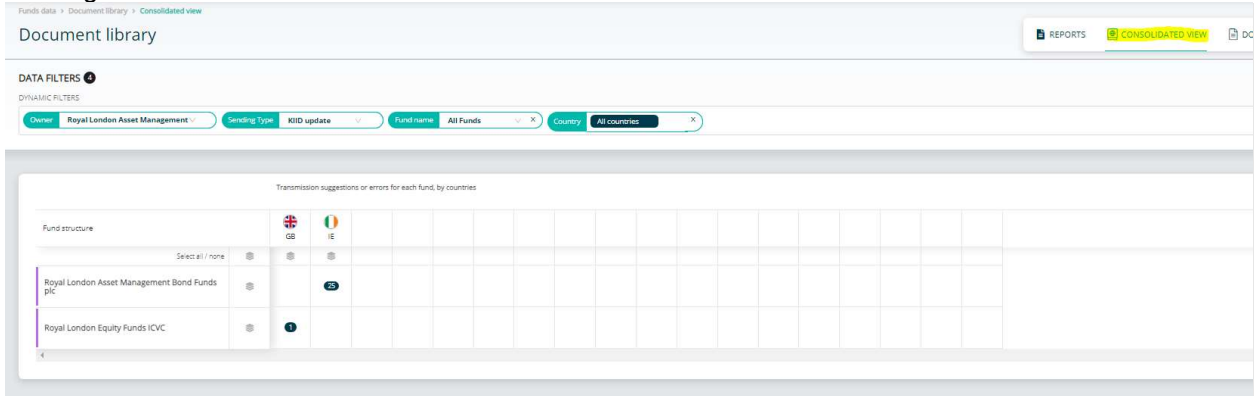**HINT:** This does not apply to clients that are using KIID filing automations.

Ideally, any KIID in the library has been filed until the new KIIDs are uploaded into the library. We suggest verifying if there remain any KIIDs in the library that should be filed prior to the annual update.

The Consolidated View helps you to check if there are still KIIDs in the document library that are available
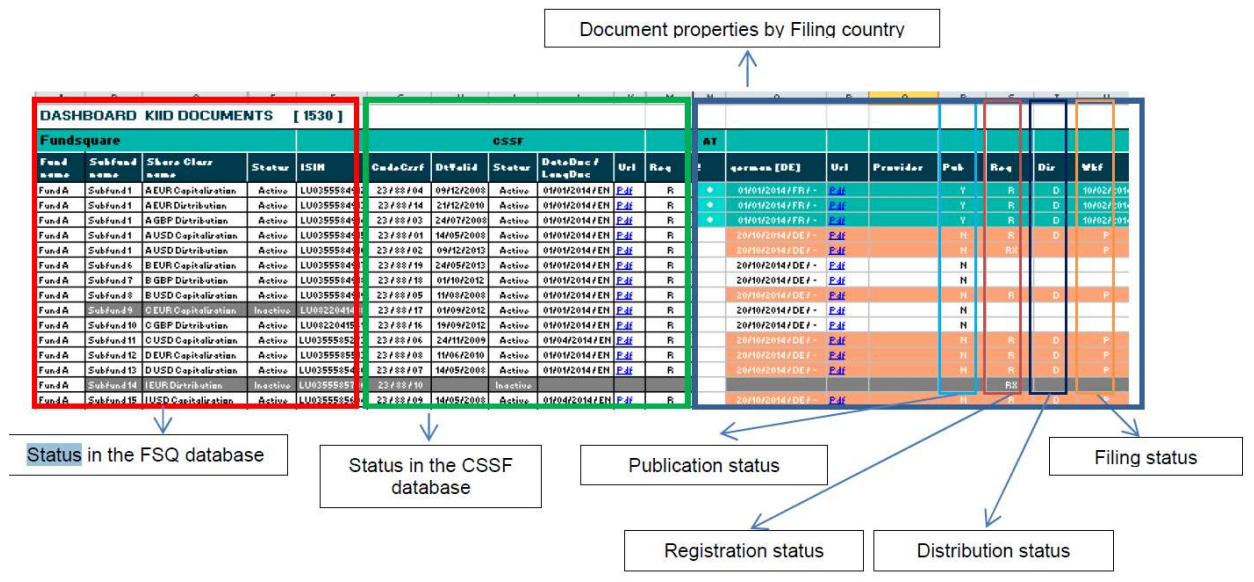
for filing:

In this case, 25 KIIDs are still deemed fileable by the system. The KIIDs suggested can by selecting the country/fund and using the Chose an action /View documents button.

2.5 Check Dashboard 3_24 – Follow up: Detailed view on KIID

This dashboard is the central hub for the various information flows, it shows, inter alia:
- share class information and status at FSQ
- share class information and status at the CSSF (for LU funds)

- KIID reference date, document link and status by filing country and language (Published – Y/N)
- registration matrix and distribution matrix status by filing country
- filing status (pending (P) – orange, selected (S) – blue, transmitted (date of package) – green) by filing country and language

3 Check the KIID upload acknowledgement file (FTP upload)

3.1 Check the KIID upload via ftp

Fundsquare S.A. is accepting documents such as KIIDs, Prospectus... by various transmission modes. You can either manually upload them, or provide them by FTP. In case of an FTP transmission, the system will generate after successful acceptance of your ZIP, an acknowledge receipt file for the transmission.

The system considers the document with the most recent reference date (in the name) as current version. The file either confirms successful integration of your documents or highlight "indexation errors":

Depending on the different indexation error we identify, we propose different ways for their resolution. The below table will list the error message, the detailed description of the error and how the error can be resolved.

Error Message	Error Message Description	Resolution Proposal
unrecognized instrument	You are trying to upload a file with reference to an instrument that the system cannot identify in Fundsquare's Database.	Please complete the FDF and send back to us([1]. As soon as the instrument has been created the ISIN number will be available, or index the document manually by visiting the indexation error screen of e-file.
document type non recognized	You are trying to upload a file with reference to a document type that is unknown to Fundsquare.	Please review the document type name and have it corrected. In most cases this is due to a typo in the file name and as you are not respecting the agreed naming convention.
country code non recognized	You are trying to upload a file with reference to a country code that is unknown to Fundsquare.	The naming convention expects that the ISO 3166-1 alpha-2 convention is applied. Further details can be found here: [2]
language code non recognized	You are trying to upload a file with reference to a language code that is unknown to Fundsquare.	The naming convention expects that the ISO 639-1 convention is applied. Further details can be found here: [3]
Duplicate document index	The name of the document has already been used (for another document existing in our database), but the content is different	This is normally the case for updated/corrected documents
Duplicate	Both the name and the content are identical (for another document existing in our database)	The document is automatically archived

Disclaimer: This document is subject to change and chosen print screens showing fundnames are random and do under no circumstances express recommendations for investments or any preferences of Fundsquare S.A.

In case of an indexation error, the header of the acknowledgement email will mention "NOK" (not ok), e.g. Fundsquare: Document Acknowledgement - Accusé de réception Documents [KIID Factory (Luxembourg) S.A. / NOK].

3.2 KIIDs "expected" to be sent for the annual update

The dashboard 3_28 – Follow up: Yearly update of KIIDs calculates an estimate of the number of KIIDs that should be uploaded onto the library: It compares, by fund, country and by language, the number of KIIDs received during the previous year (for share classes with a registration status R) before the 31st of December and compares the figure with the KIIDs received after the 31st of December.

Fund	Country	CdLangIso	Existing KIIDs	Update KIIDs	Delta
Bond Fund (Lux)	AT	DE	26	26	0
Bond Fund (Lux)	CZ	CS	27	25	2
Bond Fund (Lux)	ES	ES	32	32	0
Bond Fund (Lux)	FI	FI	15	10	5
Equity Fund (Lux)	AT	DE	21	21	0
Equity Fund (Lux)	CZ	CS	25	24	1
Equity Fund (Lux)	ES	ES	23	23	0
Equity Fund (Lux)	FI	FI	23	20	3
Mixed Fund (Lux)	AT	DE	50	50	0
Mixed Fund (Lux)	CZ	CS	14	13	1
Mixed Fund (Lux)	ES	ES	69	60	9
Mixed Fund (Lux)	FI	FI	41	42	-1
Mixed Fund (Lux)	FR	FR	69	70	-1
	Total		435	416	19

It also shows the detailed list of the KIIDs that are missing (tab Detail – KIIDs missing).

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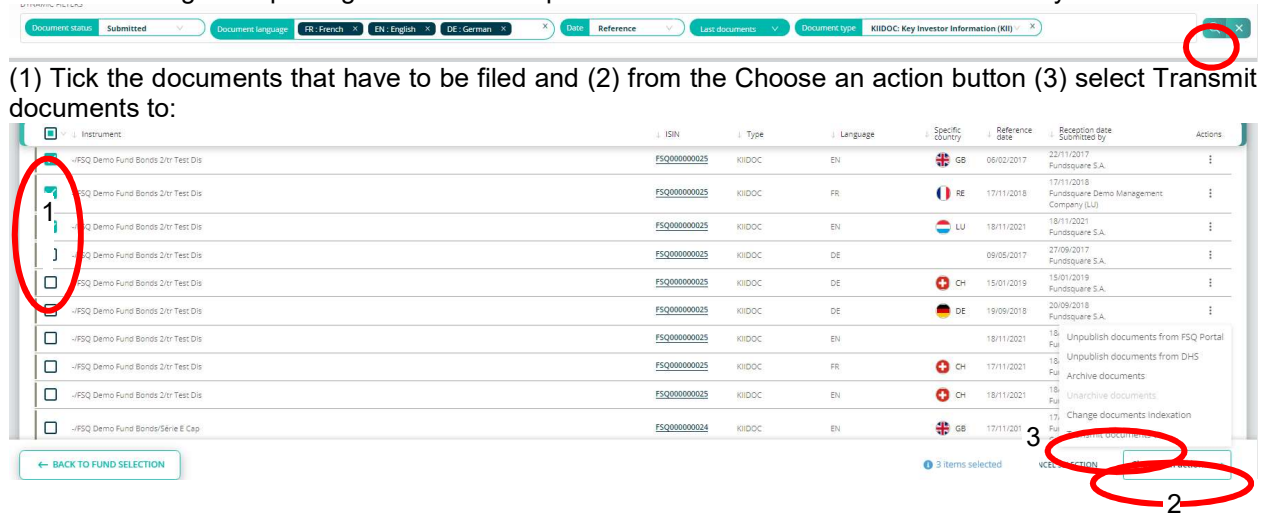
4   Automations (filing and publication)

Active automations can be checked via the dashboard Automations active/Inactive in the transmission follow up module.
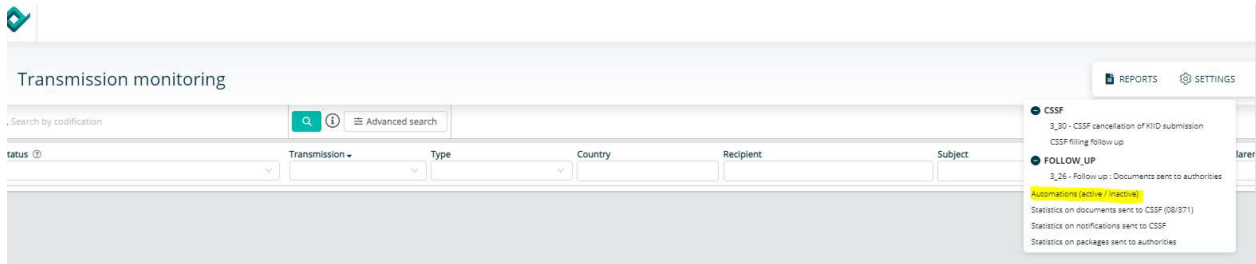
5   The Regulator Package

5.1   General

The regulator or filing package is a selection of documents that have to be sent to a home or host regulator. The filing package can either be triggered manually, through the consolidated view or by a filing automation. In order to be able to use this functionality, the necessary filing workflows (KIID update, notification light, annual report, …) have to be defined by the Regulatory Services Team (RS.ClientSupportOperations@fundsquare.net) upon client request. Each (new) fund (or umbrella) requires a filing setup.

5.2   Document selection and manual triggering of the filing package

The manual regulator package has to be compiled from within the fund's document library.
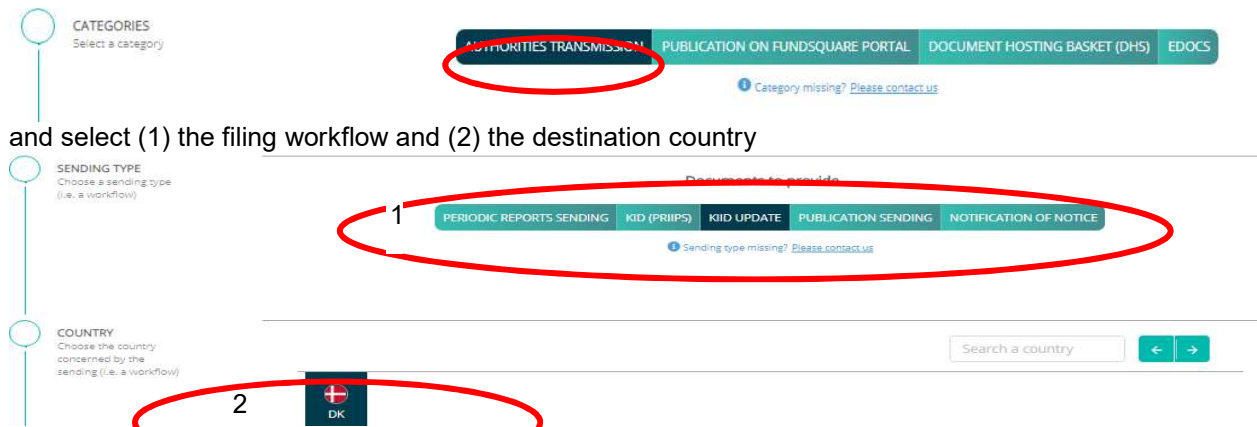
(1) Tick the documents that have to be filed and (2) from the Choose an action button (3) select Transmit documents to:

In the next screen, choose Authorities transmission

and select (1) the filing workflow and (2) the destination country

Should a required workflow not be available, please contact RS.ClientSupportOperations@fundsquare.net.

5.3   The filing Country Language Matrix ("CLM")

The filing CLM defines the KIID languages for each filing destination/country and is a mandatory setting for the consolidated view and the filing automations.   The CLM has to be provided during or after the initial setup. It links each destination country to a KIID language, either generic or specific. A filing CLM can be either specific or generic:

GENERIC	SPECIFIC

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EN-00 for LU, IE, GB	EN-LU for LU, EN-IE for IE, EN-GB for GB
DE-00 for DE and AT	DE-DE for DE, DE-AT for AT
FR-00 for FR, LU, BE	FR-FR for FR, FR-LU for LU, FR-BE for BE

In a country specific CLM, each language KIID can only be used for the specified country.

5.4 The consolidated view and the filing automations

The consolidated view allows the triggering of a filing without selecting the documents manually. The following workflows can be triggered in the consolidated view:
- KIID update and Light notifications
- Periodic reports

Automations are only available for KIID filings and run on the back of a scheduler. The consolidated view can be access through the document library via the menu on the top right side of the screen:

Select the type of workflow, fund(s) and country (ies) and hit the search:

The filing can be triggered by selecting one or multiple countries and funds and then hitting Transmit documents
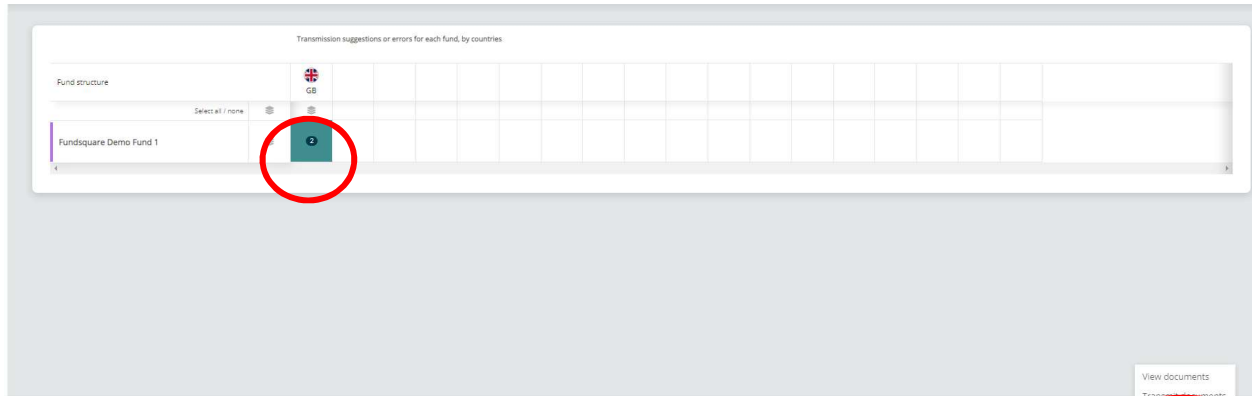
Documents included in the filing can be viewed with View documents.

5.4.1 Filing conditions for KIID filing automations

There are various conditions that need to be met so that the KIIDs appear in the consolidated view ("CV"). Most of these conditions are also shared with the filng automations ("FA"):

5.4.1.1 LU Funds: KIIDs to be sent to the CSSF

- A, E or R (resp. Ri) in the registration matrix (CV+FA);
- new (unfiled) KIID in the document library with matching language code (according to country language matrix)(CV+FA);
- the shareclass is either inactive (Constitution date but no launch date) or active (constitution date and launchdate) in the Fundsquare database. Closed or shareclasses without a constitution date will not trigger a filing (CV+FA);
- the shareclass is mapped to a CSSF code (CV);
- the shareclass is not closed in the CSSF database (CV+FA) and that it has a valid activation date (CV);
- there is not a KIID with a more recent reference date that has been previously filed with the CSSF (CV+FA).
- the filing automation is up and running (Transmission monitoring/Reports/Automations (active/inactive)(FA)

5.4.1.2 Non LU funds: KIIDs to be sent to home/host country regulators

The following conditions need to be met for KIIDs to be included in a package to the Non LU Regulators (and to the CSSF for Non Lu funds):

- A, E (notification light) or R (resp. Ri) status (KIID update) in the registration matrix (CV+FA);
- new (unfiled) KIID in the document library with matching language code (according to country language matrix)(CV+FA);
- the shareclass is either inactive (Constitution date but no launch date) or active (constitution date and launchdate) in the Fundsquare database. Closed or shareclasses without a constitution date will not trigger a filing (CV+FA);
- for LU funds: the shareclass is mapped to a CSSF code (CV);
- for LU funds: the shareclass is not closed in the CSSF database (CV+FA) and that it has a valid activation date (FA); should you wish to bypass this condition via an automation, please contact us;
- for LU Funds: Make sure that there is at least on R in the registration matrix – other wise the system will expect a full notification to be done (CV +FA);
- for Belgium, share-classes with a registration status set to Ri or Rp are excluded per definition of the Belgian Regulator (CV+FA)
- the filing automation is up and running (Transmission monitoring/Reports/Automations (active/inactive)(FA).

5.5 Transmission follow up

The transmission follow up allows to check the status of your document filings. It is available from the Launchpad:
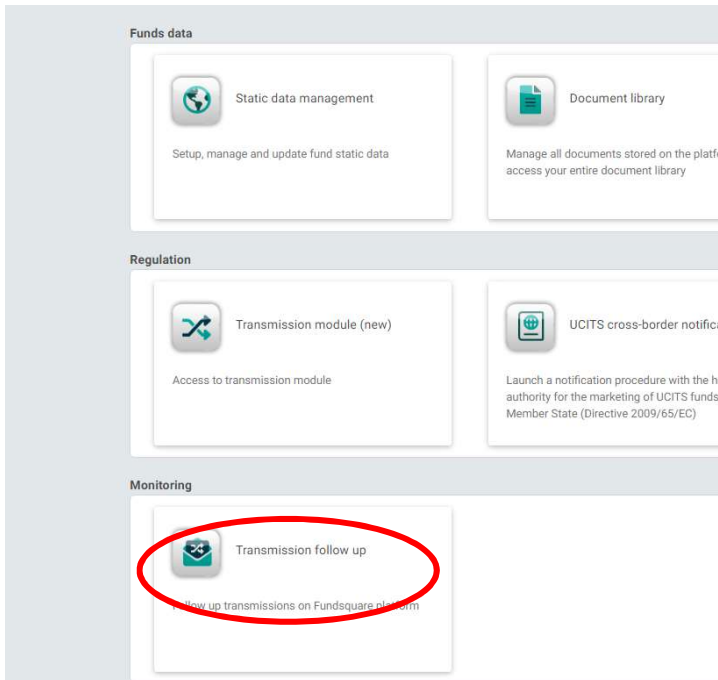
If the status has switched to « Transmitted » you should have received the copy of the filing packages sent to the authority. A more advanced search of your filings is available on the left side:

HINT: Please check Canceled and/or Transmission ongoing statuses. The reason for the cancelation can be viewed by clicking on the transmission.