



Commission de Surveillance  
du Secteur Financier

# UCITS Risk Reporting Dashboard

31 December 2025

# UCITS Risk Reporting Dashboard

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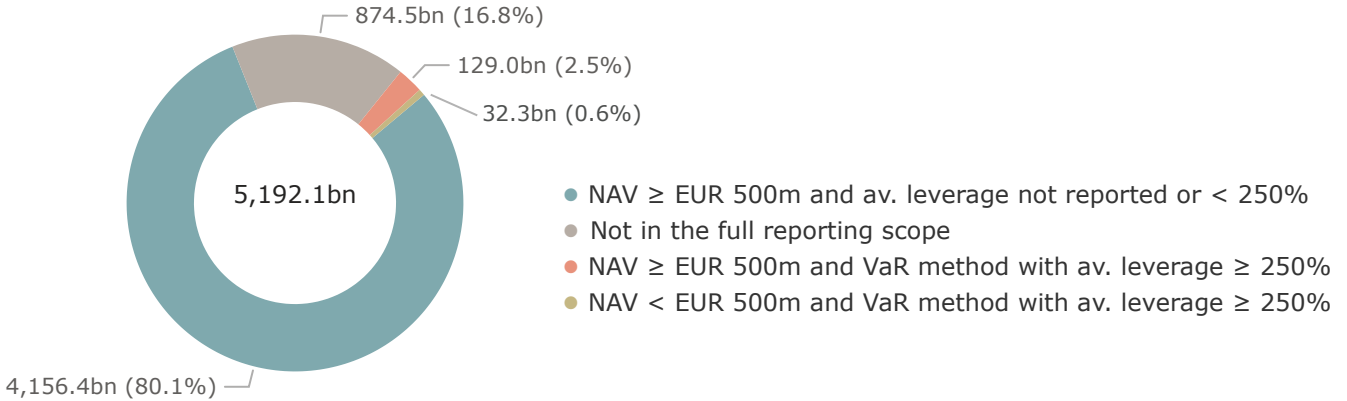
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# 1. Introduction

## 1.1. Scope of the UCITS Risk Reporting

### Net assets (EUR), by reporting scope



In the context of the UCITS Risk Reporting, all Luxembourg domiciled UCITS<sup>1</sup> authorised by the CSSF are required to provide some general information/basic functional data including the global exposure calculation method and the realised level of leverage, as well as, for UCITS under a VaR approach, the expected level of leverage. In addition, detailed information on risks is requested for UCITS falling in the "full reporting scope", i.e. UCITS fulfilling at least one of the following two criteria:

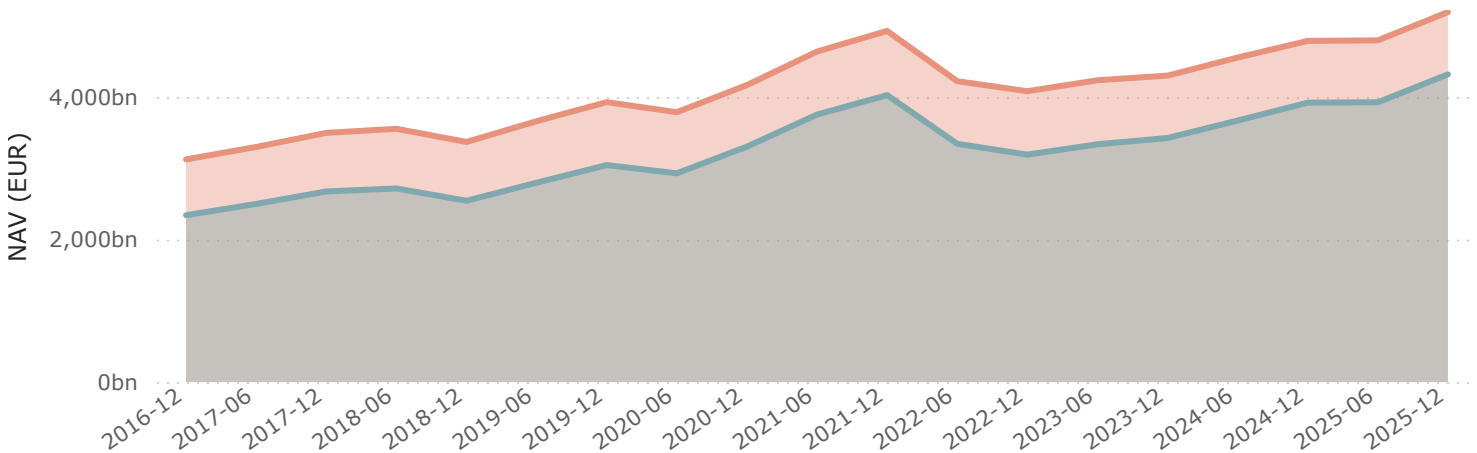
- net assets above EUR 500 million;
- use of VaR for the calculation of global exposure covered by Article 42(3) of the 2010 Law with an average gross leverage during the semester greater than 250%<sup>2</sup>.

<sup>1</sup> In this report, the terms "UCITS" and "fund" will be used both for an entity in the case of a non-umbrella UCITS and for each sub-fund in the case of an umbrella UCITS.

<sup>2</sup> In accordance with the rules set out in the applicable regulation, the gross leverage is calculated as the notional sum of the derivatives used.

### Net asset value

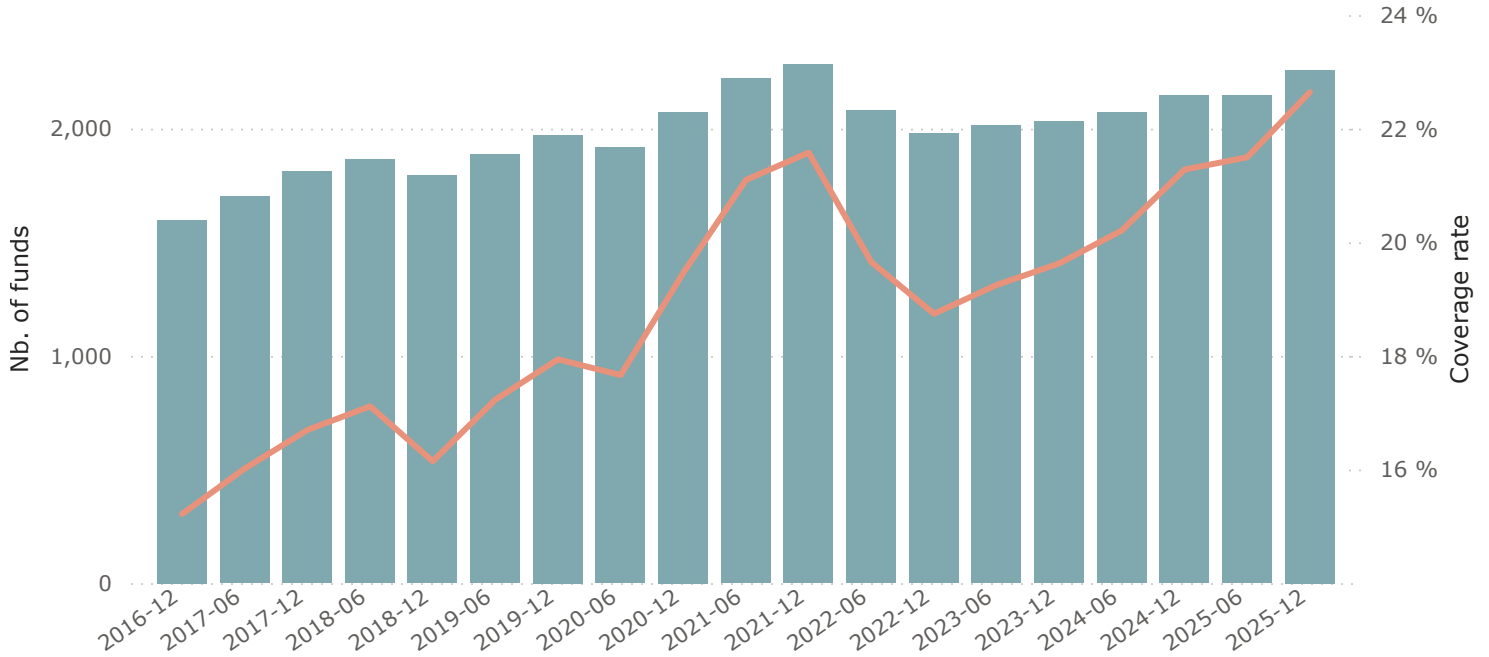
● All UCITS ● In the full reporting scope



## 1.2. Evolution of the full reporting scope and the coverage rate

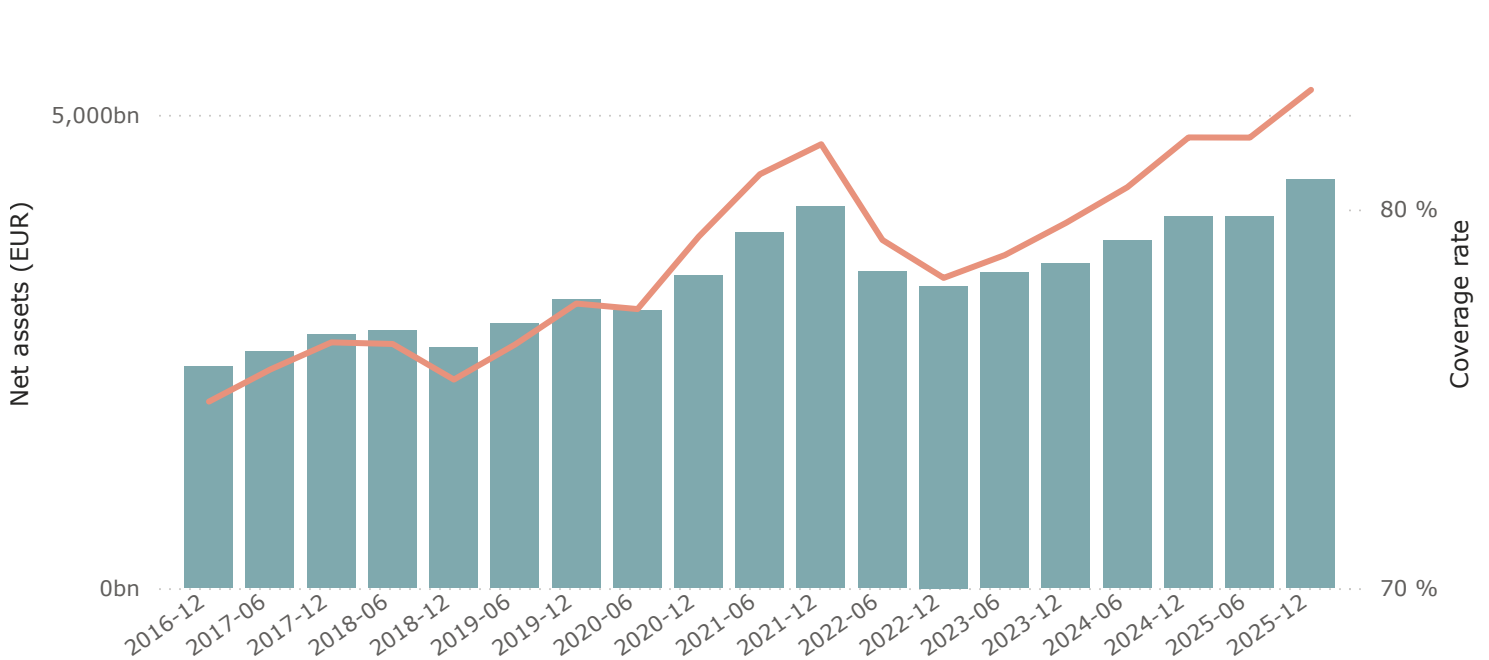
### Coverage (nb. of funds)

● Nb. of funds in full scope ● Coverage rate



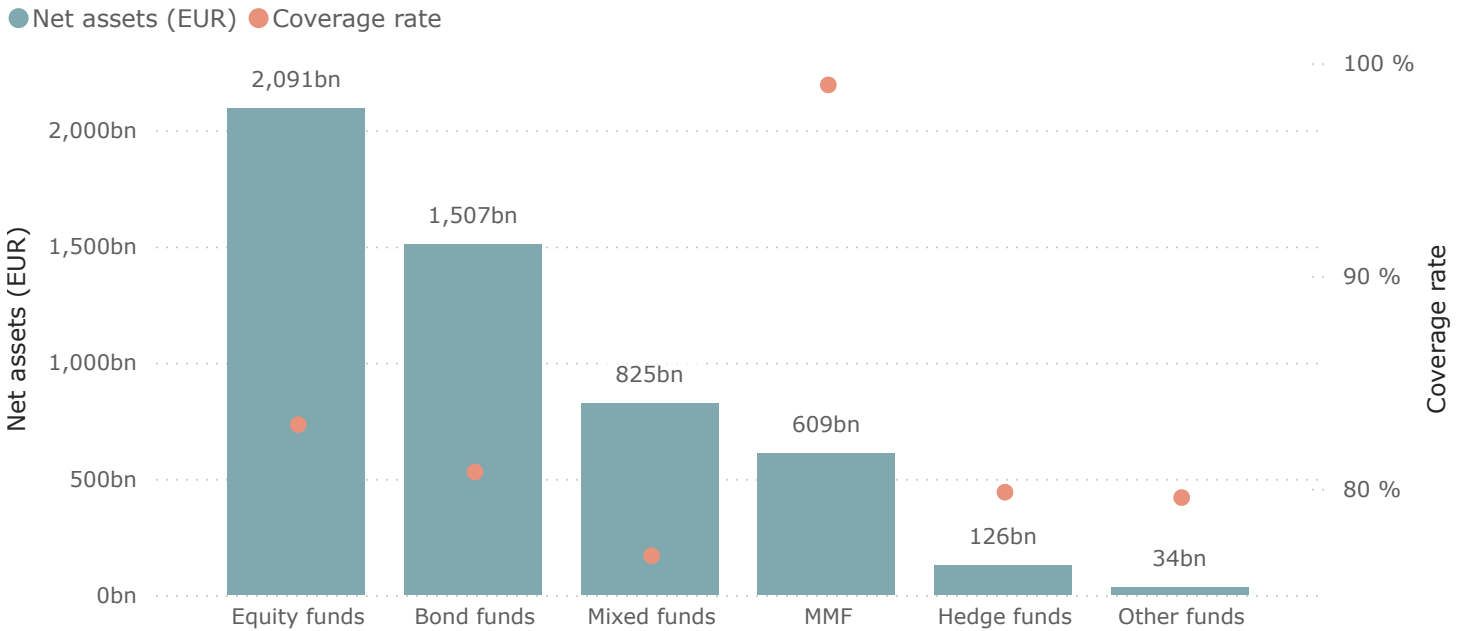
### Coverage (net assets)

● Net assets of funds in full scope ● Coverage rate

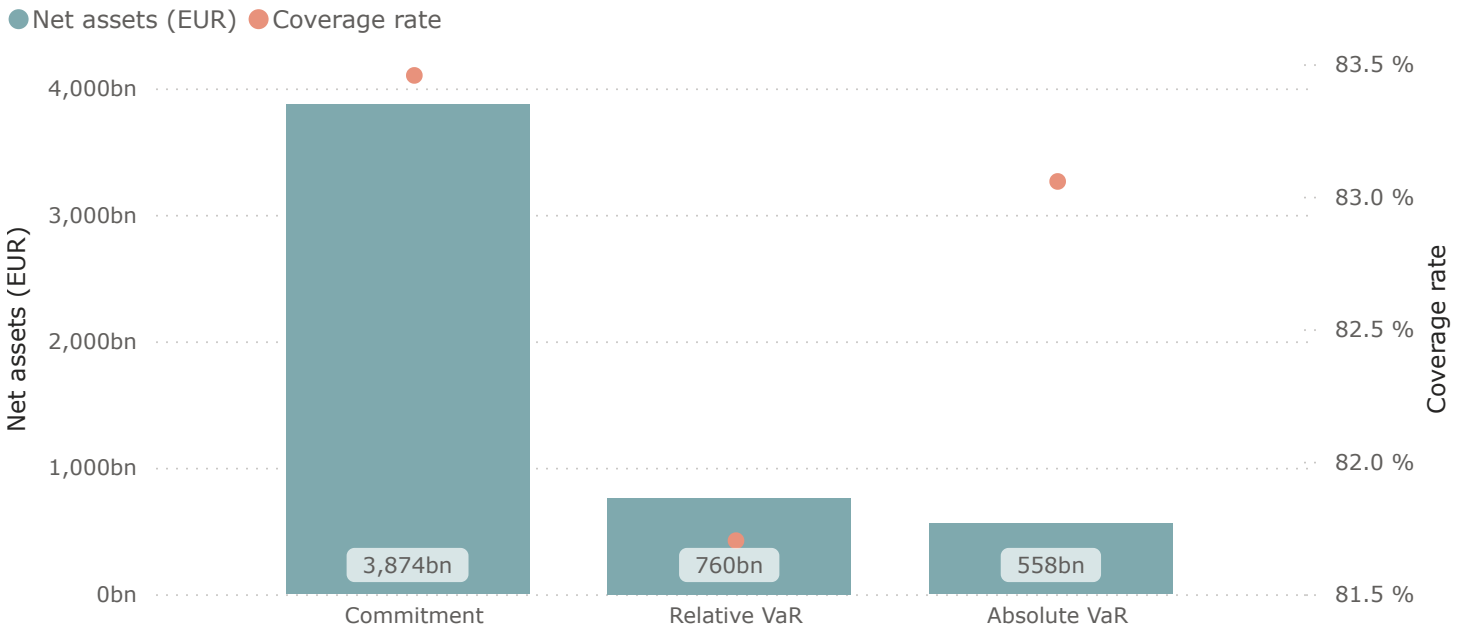


### 1.3. Coverage rate of the full reporting scope by investment policy type and global exposure calculation method

#### Coverage rate by investment policy type



#### Coverage rate by global exposure calculation method



**Note:** Fund classifications are based on the BCL investment policy types. The category “Hedge funds” includes funds that implement alternative strategies while respecting the UCITS regulatory framework (often referred to as “liquid alternative funds”). The category “Other funds” is much smaller than the others and concentrated on a limited number of funds (e.g. as of 31 December 2025, the 4 largest funds account for ~52% of its net assets), sometimes resulting in significant change in risk indicators over time.

## 2. Executive summary

### Key indicators

<b>Size</b>	Bond funds	Equity funds	Hedge funds	Mixed funds	MMF	Other funds	<b>Total</b>
Number of funds	2,986	3,959	391	2,408	101	128	<b>9,973</b>
of which in the full reporting scope	776	898	137	362	68	17	<b>2,258</b>
Coverage rate (by number of funds)	26 %	23 %	35 %	15 %	67 %	13 %	<b>23 %</b>
Net asset value	1,507bn	2,091bn	126bn	825bn	609bn	34bn	<b>5,192bn</b>
of which in full reporting scope	1,217bn	1,736bn	101bn	634bn	603bn	27bn	<b>4,318bn</b>
Coverage (NAV % of UCITS of same policy)	81 %	83 %	80 %	77 %	99 %	80 %	<b>83 %</b>
Average fund size	0.50bn	0.53bn	0.32bn	0.34bn	6.03bn	0.27bn	<b>0.52bn</b>
Average fund size in the full reporting scope	1.57bn	1.93bn	0.73bn	1.75bn	8.86bn	1.60bn	<b>1.91bn</b>
Proportion of total market (% of NAV)	29%	40%	2%	16%	12%	1%	<b>100%</b>
of which in the full reporting scope (% of overall NAV)	23 %	33 %	2 %	12 %	12 %	1 %	<b>83 %</b>

### Leverage

	Bond funds	Equity funds	Hedge funds	Mixed funds	MMF	Other funds	<b>Total</b>
Realised leverage (sum of derivatives' notional amount, overall UCITS population)	76.4%	21.2%	396.1%	60.3%	7.1%	106.6%	<b>50.9%</b>
Variation in p.p. since last year	4 %	5 %	26 %	-8 %	-1 %	-7 %	<b>4 %</b>

### Liquidity (normal conditions)

	Bond funds	Equity funds	Hedge funds	Mixed funds	MMF	Other funds	<b>Total</b>
% of portfolio liquid within 1W (normal conditions, UCITS in full reporting scope)	89 %	92 %	91 %	91 %	81 %	99 %	<b>89 %</b>
Variation in p.p. since last year	-1 %	1 %	-3 %	-1 %	-6 %	0 %	<b>-1 %</b>

- The overall UCITS population, as of 31 December 2025, is made of 9,973 funds (incl. dormant / unlaunched funds) totaling net assets of EUR 5,192bn (+8.4% compared to December 2024), mainly equity and bond funds (resp. 40% and 29% in terms of net assets).
- The Full reporting scope is made of 2,258 funds totaling net assets of EUR 4,318bn. It fairly covers the overall UCITS population. The predominant criterion for falling in the full reporting scope remains size (i.e. NAV above EUR 500M). The coverage rate in terms of number of funds (23%) and in terms of net assets (83%) reached a new record since the introduction of the URR reporting.
- The main events affecting financial markets in 2025 were (i) sweeping U.S. tariff announcements in April, which triggered a sharp global equity sell-off, (ii) a strong recovery of stock markets led by artificial intelligence-related firms and large-cap technology stocks, (iii) monetary easing, including 4 rate cuts by the ECB beginning in June and 3 by the Fed in September-December, (iv) Germany's reform of the debt brake and the creation of a EUR 500bn debt-financed special fund (*Sondervermögen*), which supported expectations of higher public investment, (v) a rise in U.S. corporate bankruptcies and growing concerns

about deteriorating lending standards in private credit markets, and (vi) persistent geopolitical tensions and ongoing conflicts, which contributed to episodic volatility, particularly in commodities, and added uncertainty to the economic outlook.

The **key outcomes** for UCITS falling in the full reporting scope are the following:

With regards to **leverage, market risk and EPM techniques**:

- The average gross leverage (i.e. the sum of derivatives' notional amount) increased from 47% in 2024-H2 to 51% in 2025-H2. The increase concerns equity, bond and so-called hedge funds, and is driven by IR derivatives used by funds applying the Value-at-Risk ("VaR") approach for calculating their global exposure.
- The usage of leverage remained generally low in comparison to the regulatory limit (for funds under the commitment approach), respectively to the expected/maximum expected level of gross leverage disclosed in the prospectus (for funds under the VaR approach).
- The annualised volatility of funds in the full reporting scope decreased to 6.8% after a spike of 11.3% in the first half-year 2025. This spike was particularly noticeable in equity funds whose volatility over the first half-year 2025 reached 21.2%.
- The semi-annual average VaR remained stable at about 4.8%.
- The volume of EPM techniques increased from EUR 179.4bn (4.6% TNA) in December 2024 to EUR 208.7bn (4.8% TNA) in December 2025, driven by securities lending. For reference, the volume of EPM techniques stood at EUR 94.3bn or 4.0% TNA at the introduction of the UCITS Risk Reporting in 2016.
- The results of the univariate stress tests (equity shock and interest rate curve parallel shift) remained stable on average over all asset classes.

With regards to **liquidity risk** (based on self-assessments from the IFMs under non-harmonised models and processes):

- On average, the share of net assets that IFM expect to be able to liquidate within one week under normal market conditions decreased slightly from 90% at the end of 2024 to 89% at the end of 2025.
- The availability and use of Liquidity Management Tools remained broadly stable, the most used being swing pricing. The share of full scope funds (in terms of TNA) using swing pricing however decreased slightly from 34.3% to 31.3% over the year.
- The distribution of the highest daily net redemption during the semester remained broadly stable. The highest net redemption remained below 2.5% of net assets for about 71% (66% as of December 2024) of all full scope funds on average over all asset classes, with the notable exception of MMFs displaying higher levels which can be explained by their use as short-term cash management vehicles by investors.

With regards to **credit risk**:

- The credit risk exposure by credit spreads continued to improve. The share of net assets with a credit spread below 100bps reached 78% of net assets (71% in December 2024) of those funds in the full reporting scope with a debt exposure at least half of their assets.
- The results of the univariate stress tests on credit spreads (scenario of a doubling of all credit spreads) also improved for bond funds from -5.5% to -4.5% of TNA.

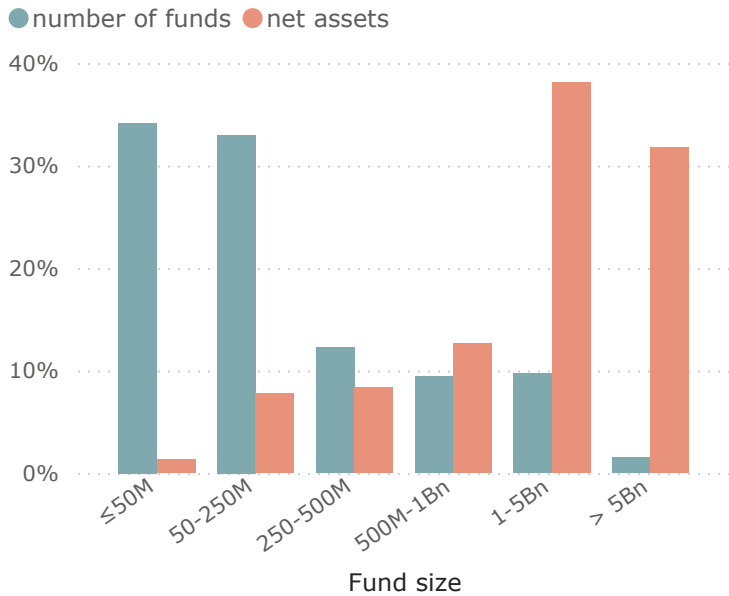


### 3. Overall UCITS population

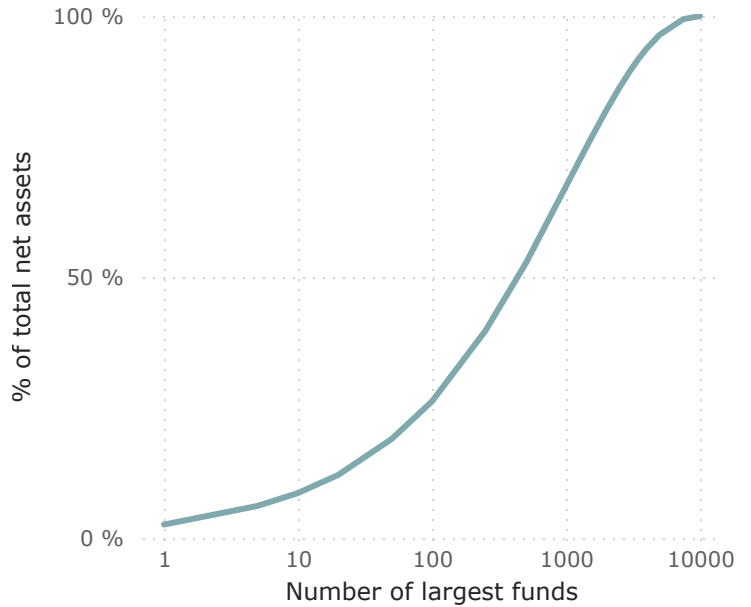
#### 3.1. Main characteristics

##### 3.1.1. Net assets

###### Market concentration

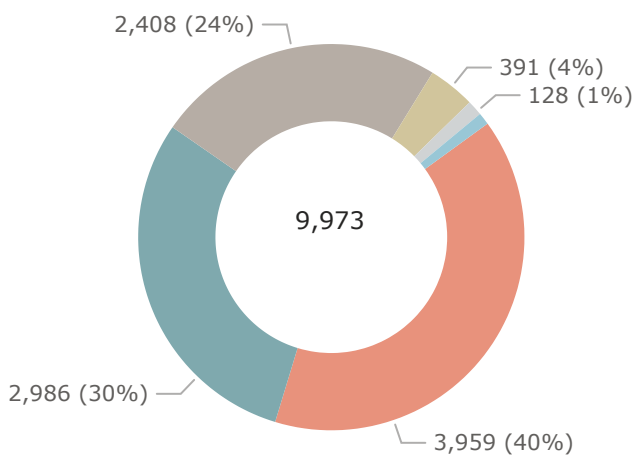


###### Market concentration

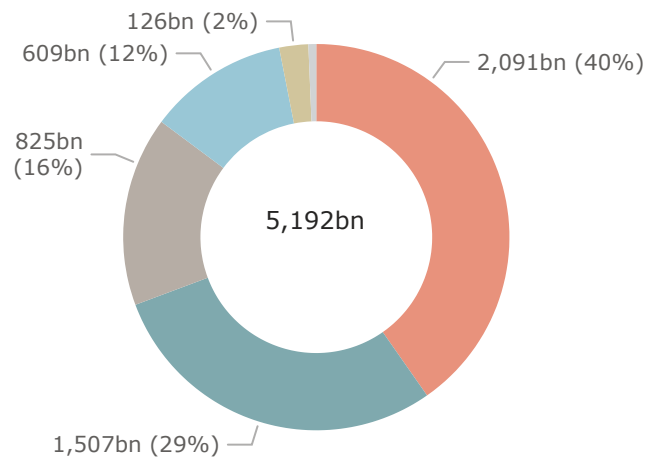


##### 3.1.2. Investment policy types

###### Number of funds



###### Net assets (EUR)

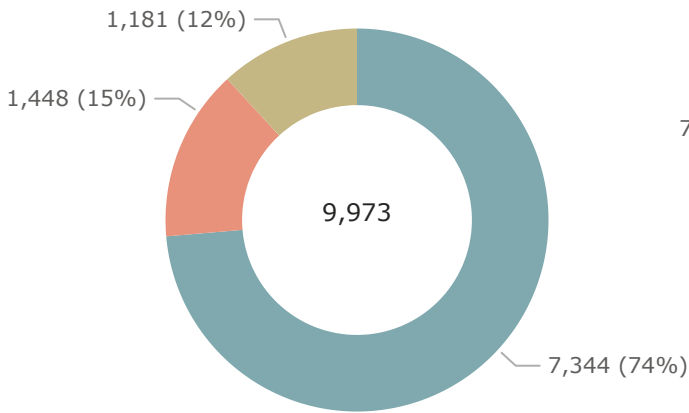


● Equity funds ● Bond funds ● Mixed funds ● Hedge funds ● MMF ● Other funds

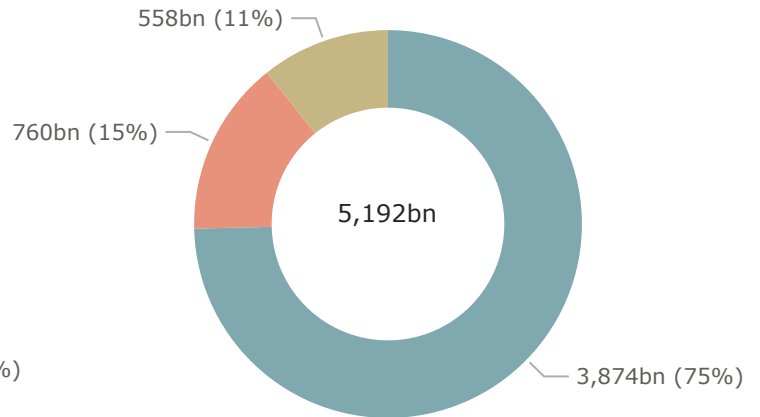


### 3.1.3. Global exposure calculation methods

Number of funds



Net assets (EUR)



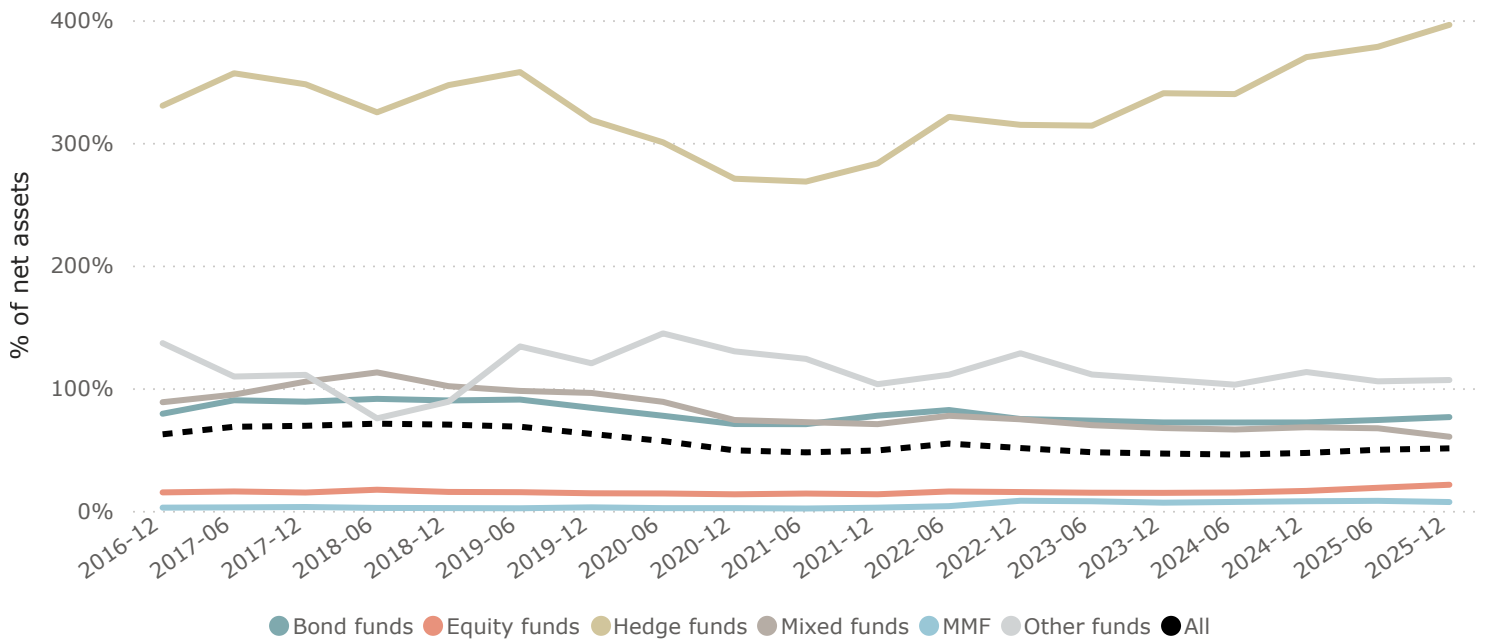
● Commitment ● Relative VaR ● Absolute VaR

● Commitment ● Relative VaR ● Absolute VaR

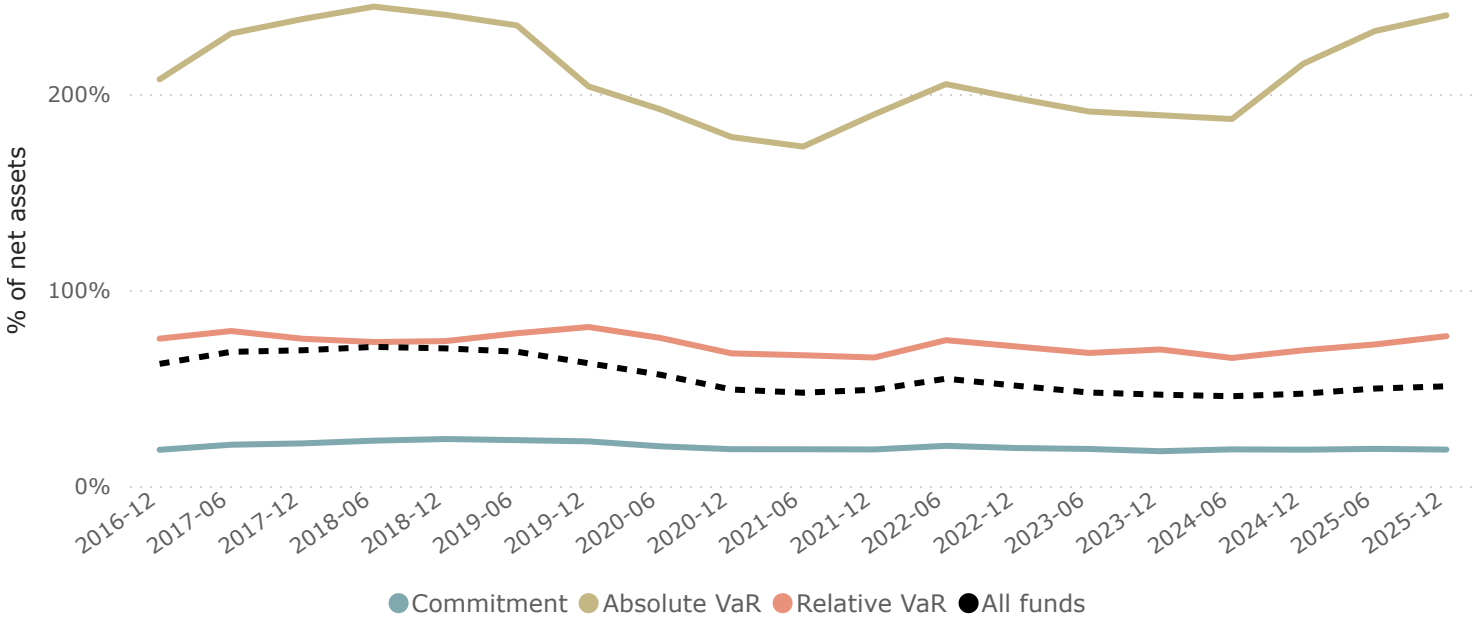
## 3.2. Realised leverage

### 3.2.1. Realised gross leverage by investment policy type and by global exposure calculation method

Realised gross leverage as share of net assets, by investment policy



## Realised gross leverage as share of net assets, by global exposure calculation method

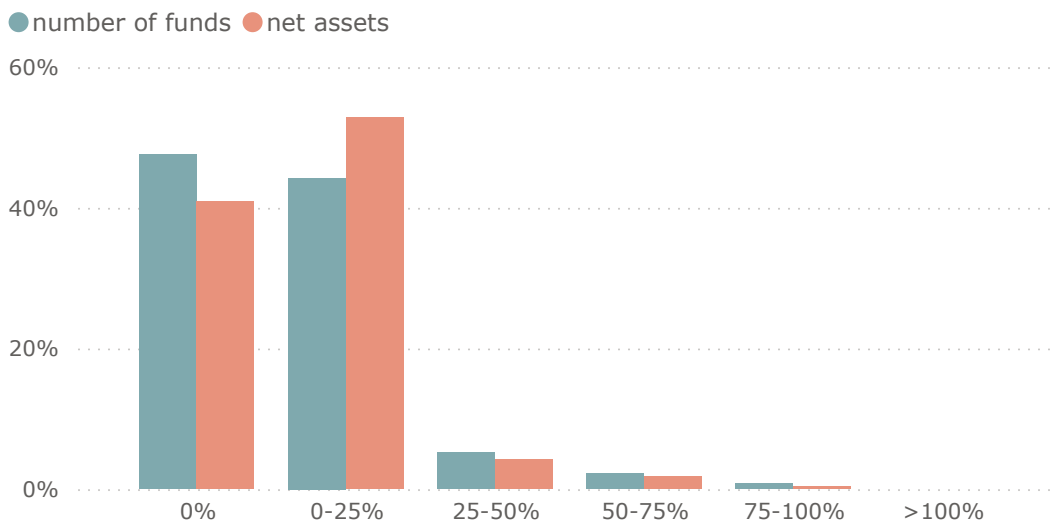


**Methodology note:** For the purpose of the 2 graphs above, the realised gross leverage is the sum of derivatives' notional amounts

- for funds under a VaR approach, the semester-average;
- for funds under the commitment approach and NAV above 500M EUR, the semester-end value; and
- for funds under the commitment approach and with NAV below 500M EUR, the weighted % of NAV average of the semester-end leverage of all funds in the same category under the commitment approach and with NAV above 500M EUR.

### 3.2.2. Realised leverage for funds under the commitment approach

#### Realised leverage (Commitment)

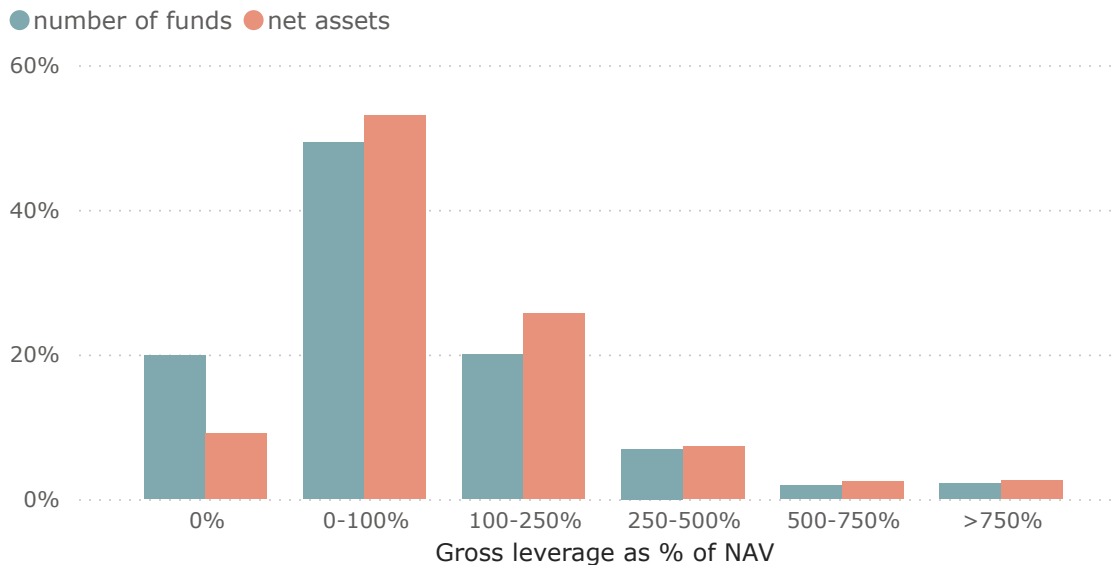


**Methodology note:** The realised leverage level is based on the commitment approach, as defined by CESR 10/788.

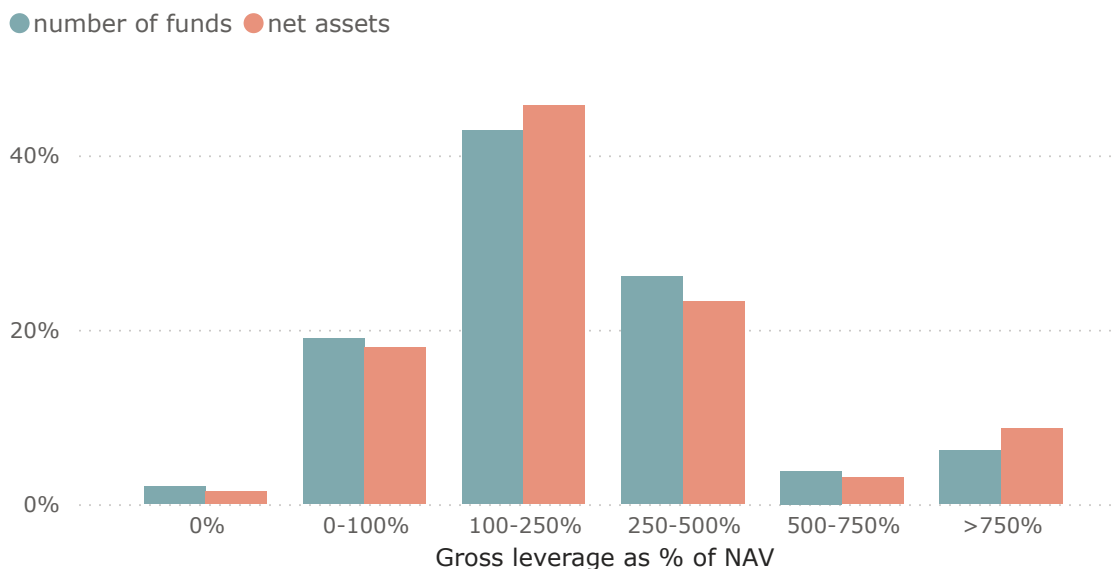


### 3.2.3. Realised and expected gross leverage for funds under the VaR approach

#### Distribution of realised gross leverage



#### Distribution of expected gross leverage



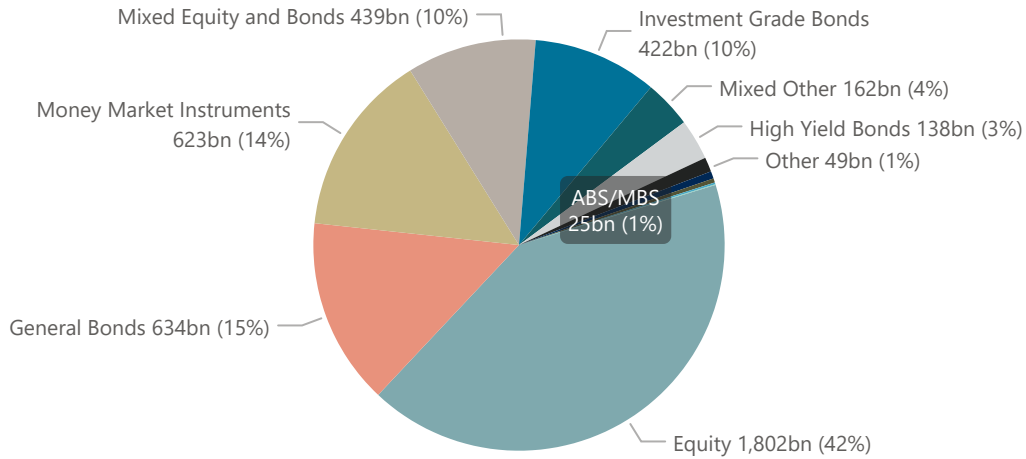
**Methodology note:** The realised gross leverage level is based on the sum of the notionals method as defined by CESR 10/788. Where several levels of leverage are disclosed in the prospectus (for example an expected and a maximum or a range with minimum and maximum), the expected leverage is the highest number.



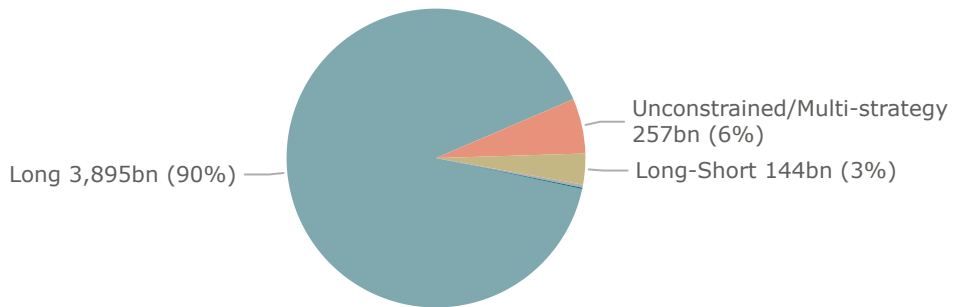
## 4. UCITS in the full reporting scope

### 4.1. Main characteristics

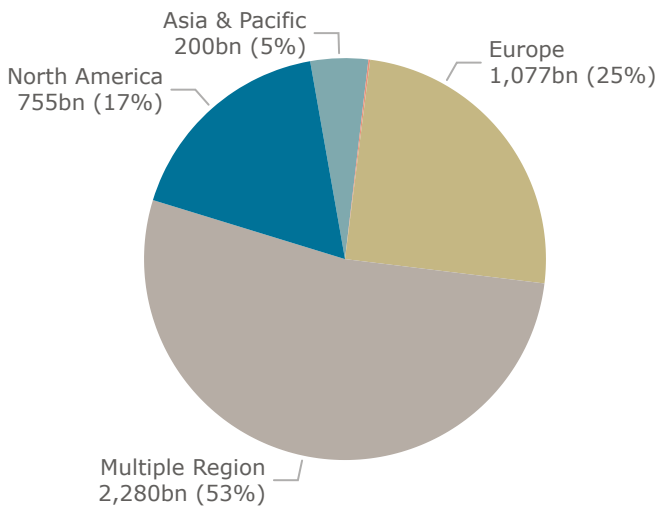
#### Principal asset classes (by net assets)



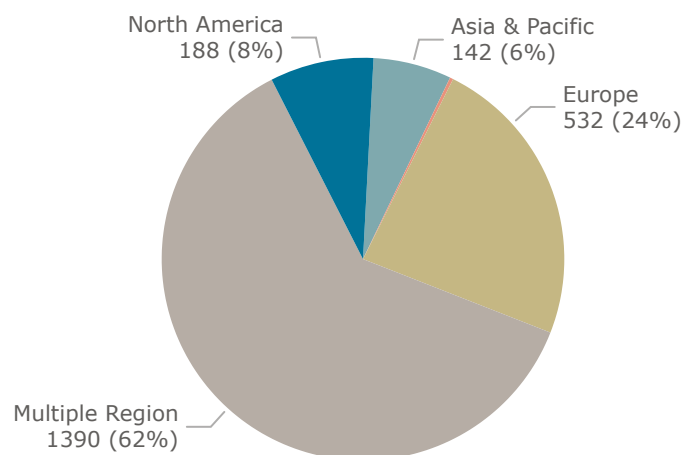
#### Principal investment strategy (by net assets)



#### Investment regions (by net assets)



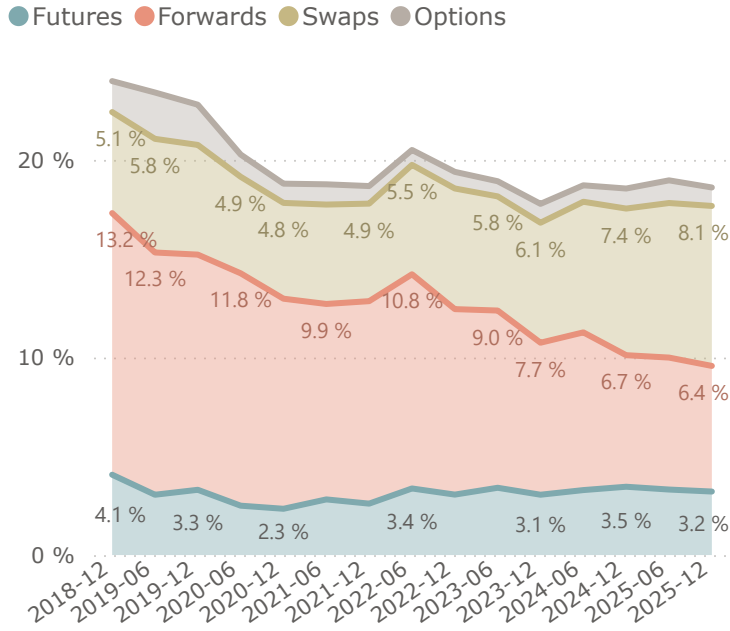
#### Investment regions (by number of funds)



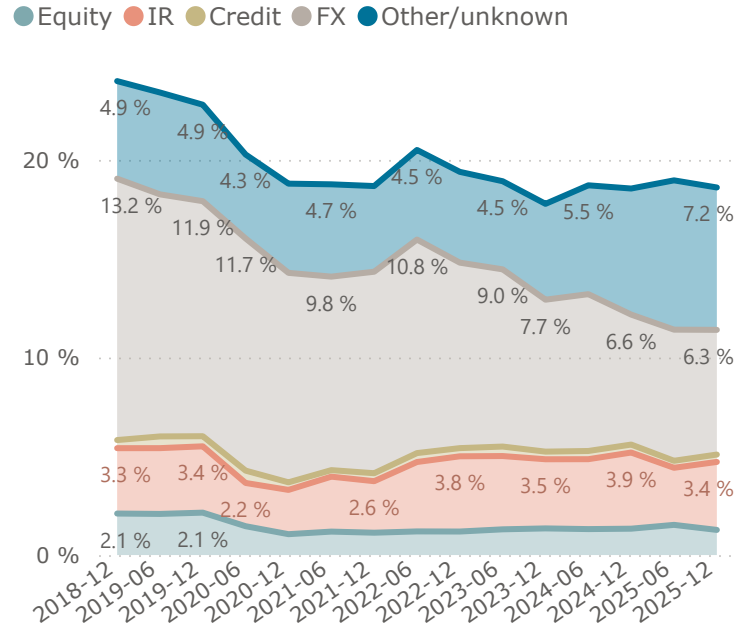
## 4.2. Global exposure and leverage

### 4.2.1. Funds under the Commitment approach

**Gross leverage per derivative category as share of net assets**

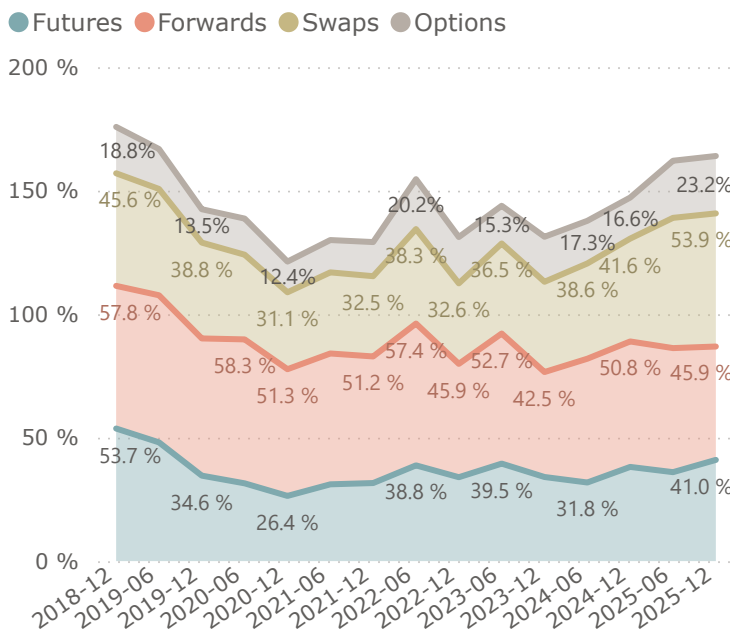


**Gross leverage per risk factor as share of net assets**

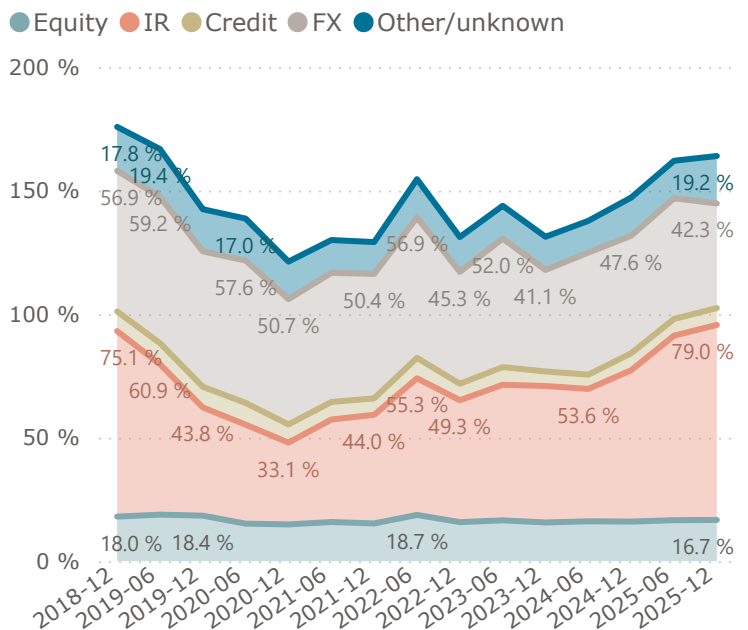


### 4.2.2. Funds under the VaR approach

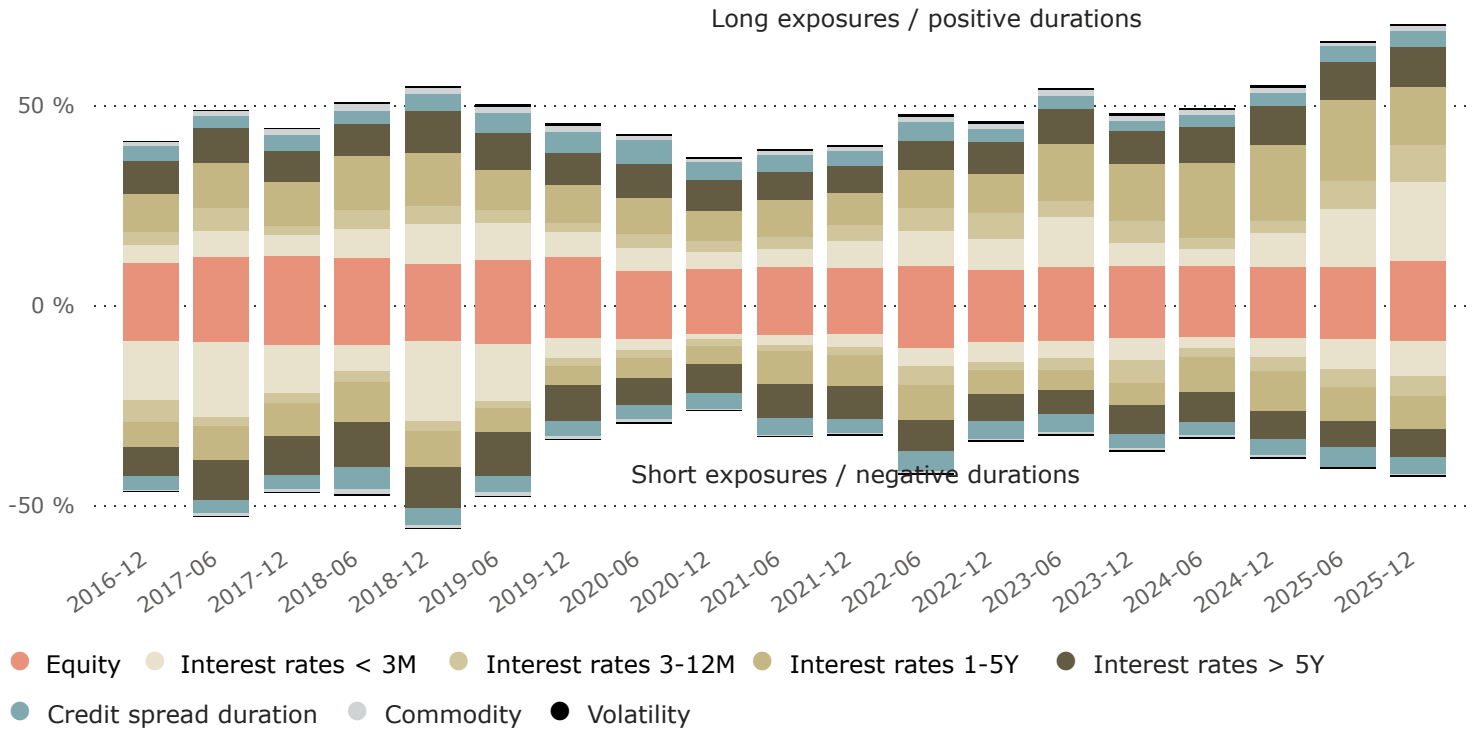
**Gross leverage per derivative category as share of net assets**



**Gross leverage per risk factor as share of net assets**



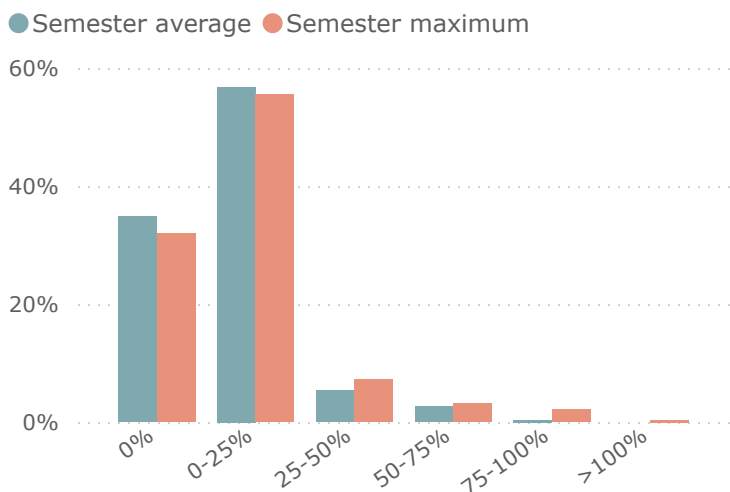
## Gross leverage as share of net assets per risk factors (VaR funds) ex-FX and "Other"



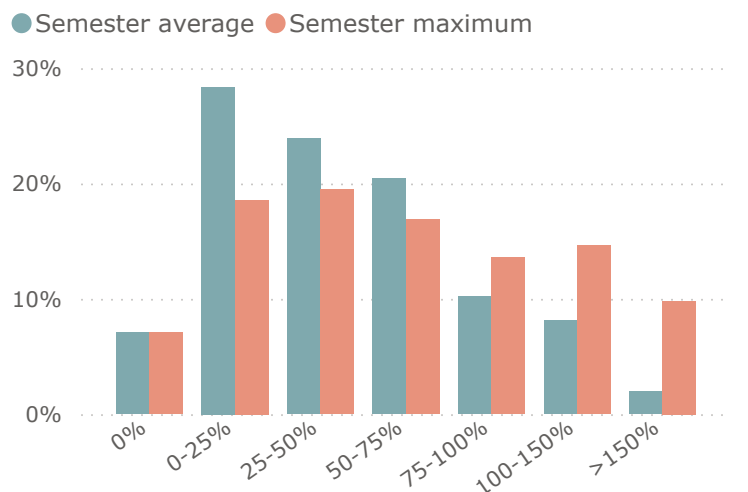
**Note:** As per the guidelines, "positive" interest rate and credit spread duration correspond to long exposure on bonds. It represents exposures such as fixed rate receiver of an IRS or protection seller of a CDS.

### 4.2.3. Usage of leverage of funds in the full reporting scope

#### Leverage usage distribution by number of funds using the commitment approach



#### Leverage usage distribution by number of funds using the VaR approach

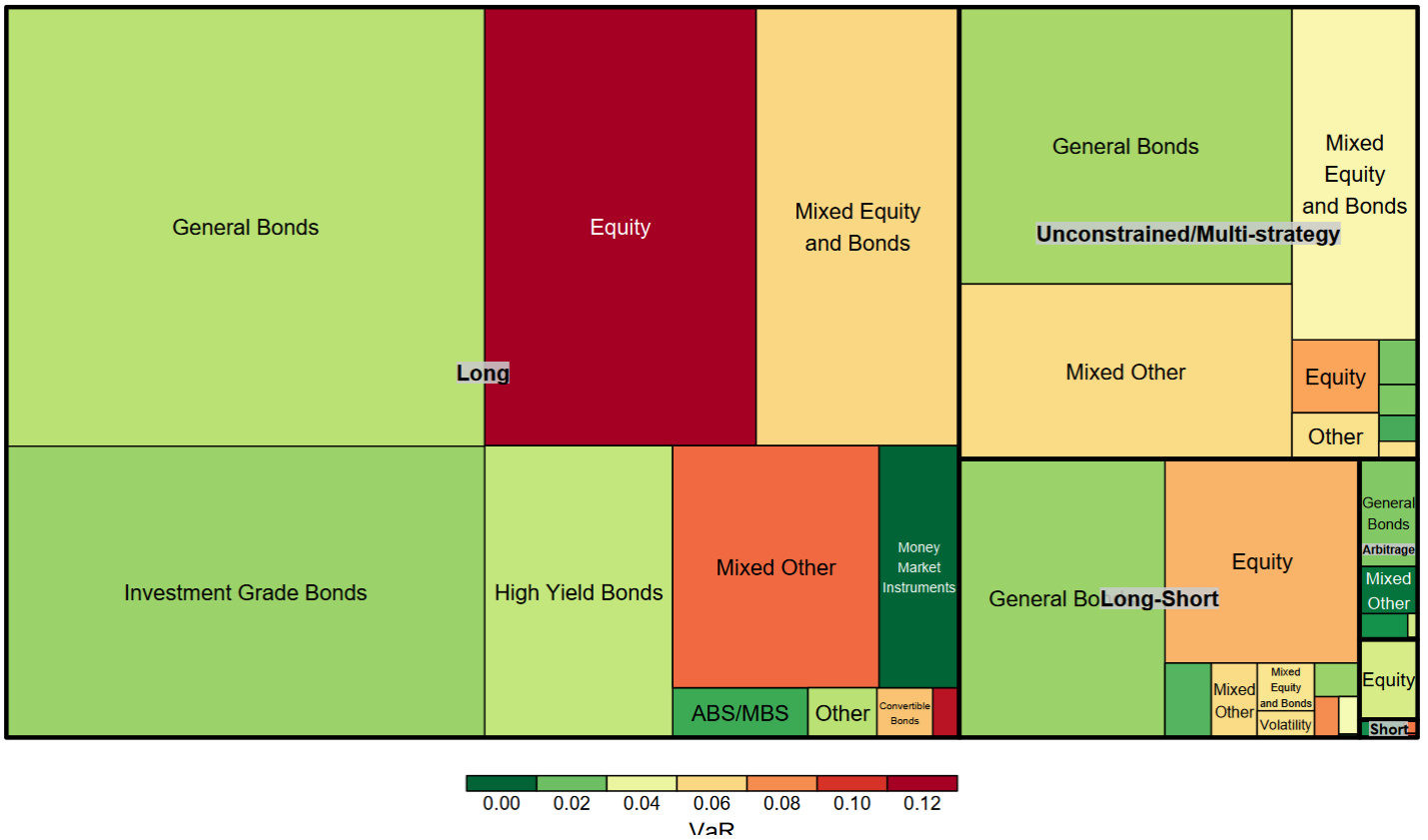


**Note:** For the purpose of this report, the usage of leverage is defined as the ratio of the realised leverage (according to commitment approach) to the regulatory limit for funds under the commitment approach, respectively the ratio of the gross realised leverage (sum of derivatives' notionals) to the expected level of gross leverage disclosed in the prospectus for funds under the VaR approach.



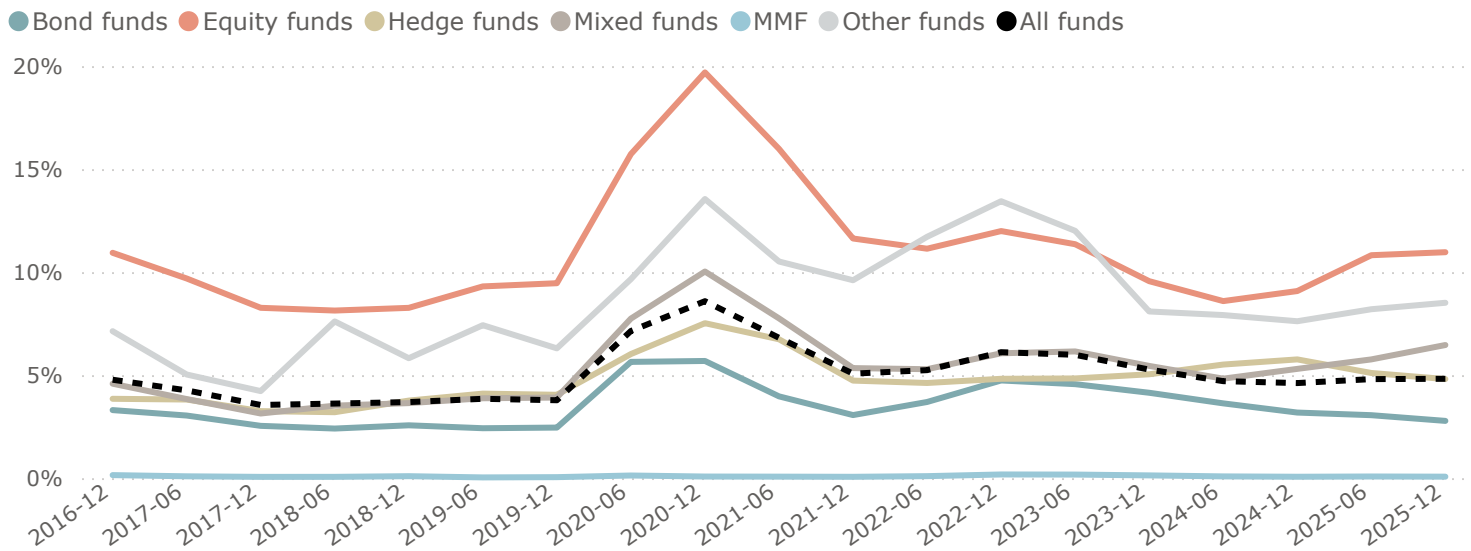
### 4.2.4. Value-at-Risk (VaR)

Net assets and NAV-weighted average absolute VaR (as share of net assets), by principal asset class and principal investment strategy



**Note:** The “heatmap” graph represents each fund category by a rectangle whose size is proportional to its net assets and whose colour reflects its average absolute VaR (confidence interval of 99% and holding period of 1 month). For the avoidance of doubt, the graph is based on the absolute VaR levels of both UCITS under an absolute and a relative VaR approach.

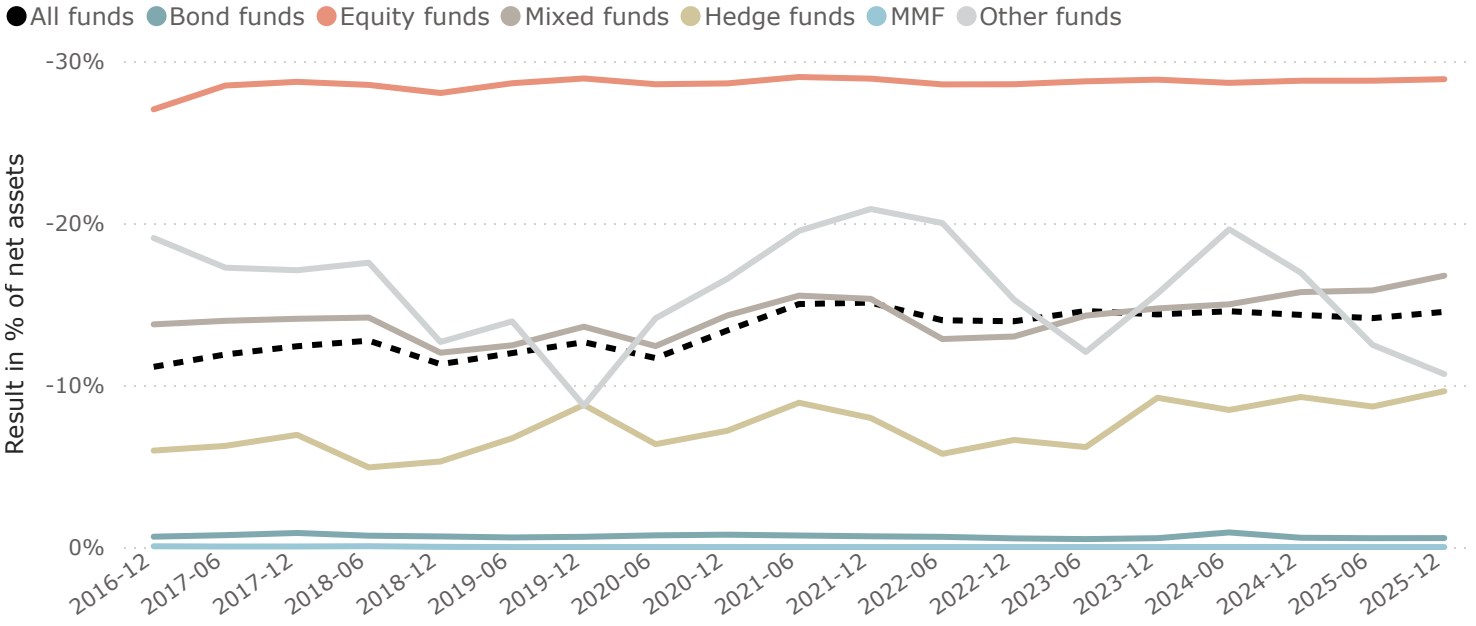
### Average absolute VaR (weighted % of NAV)



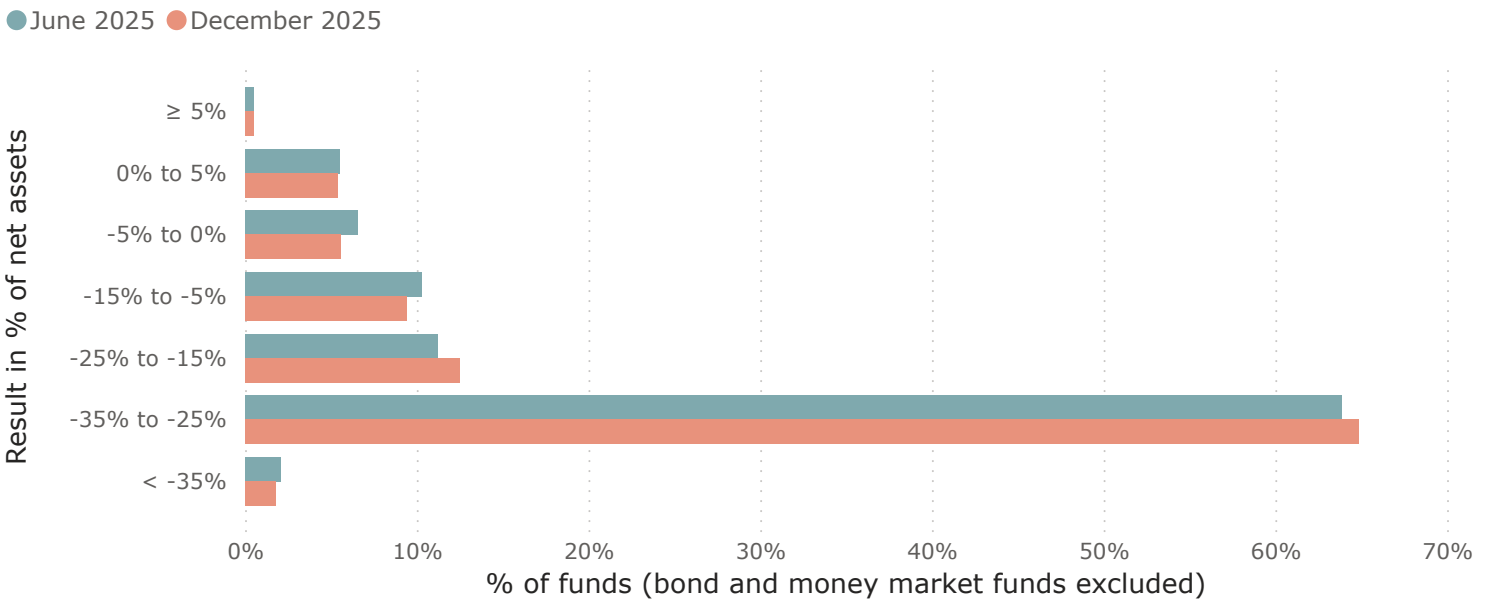
### 4.3. Stress testing and other risk indicators

#### 4.3.1. Univariate stress test results

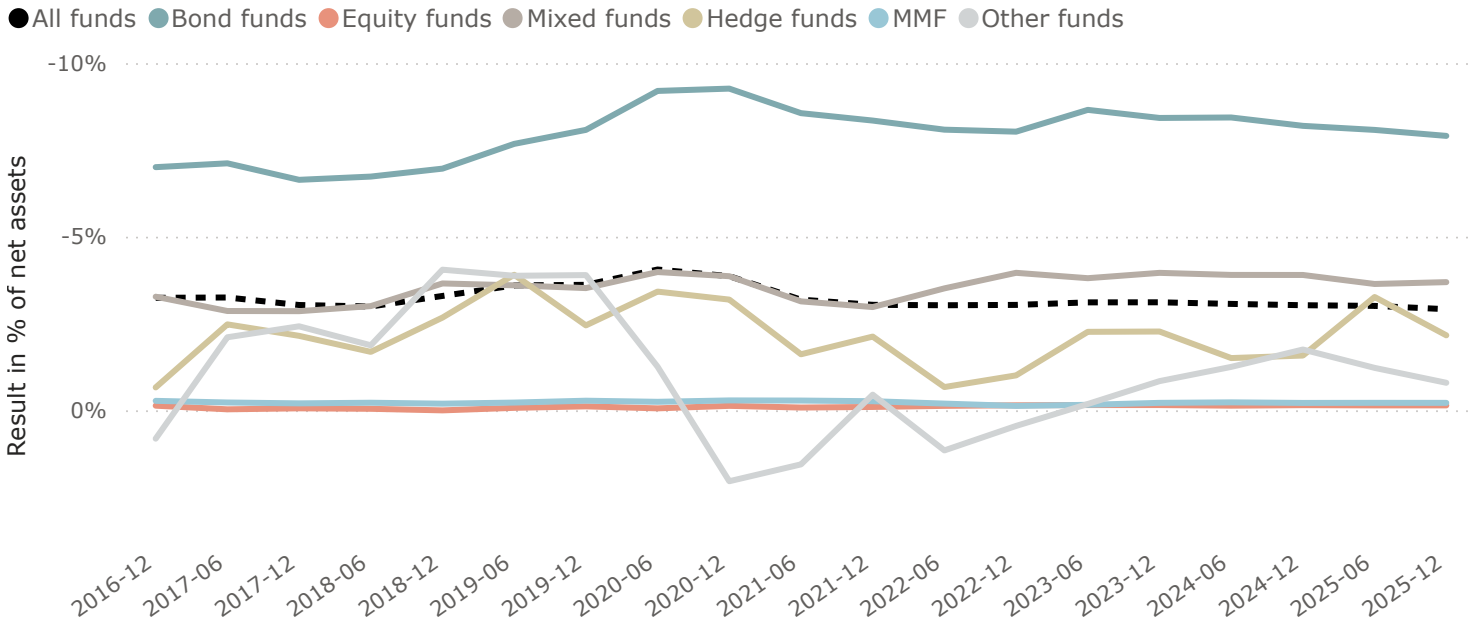
##### Equities -30%



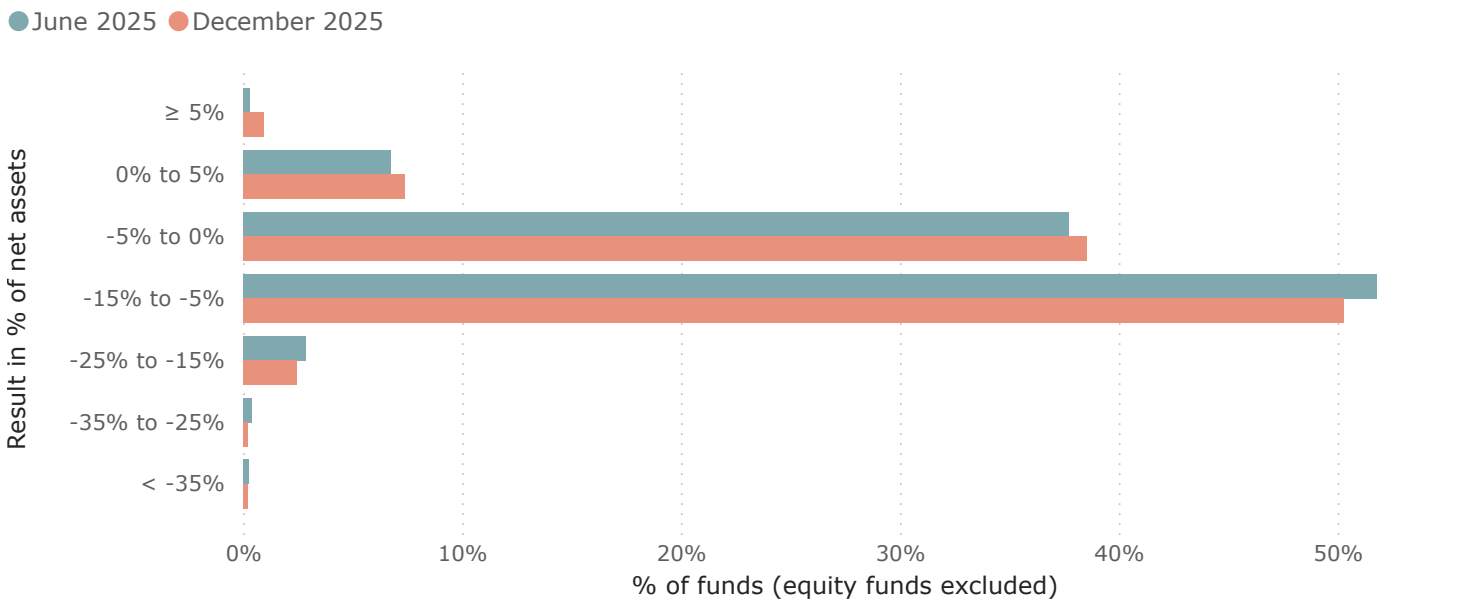
##### Equities -30%



### Interest rates +200bps

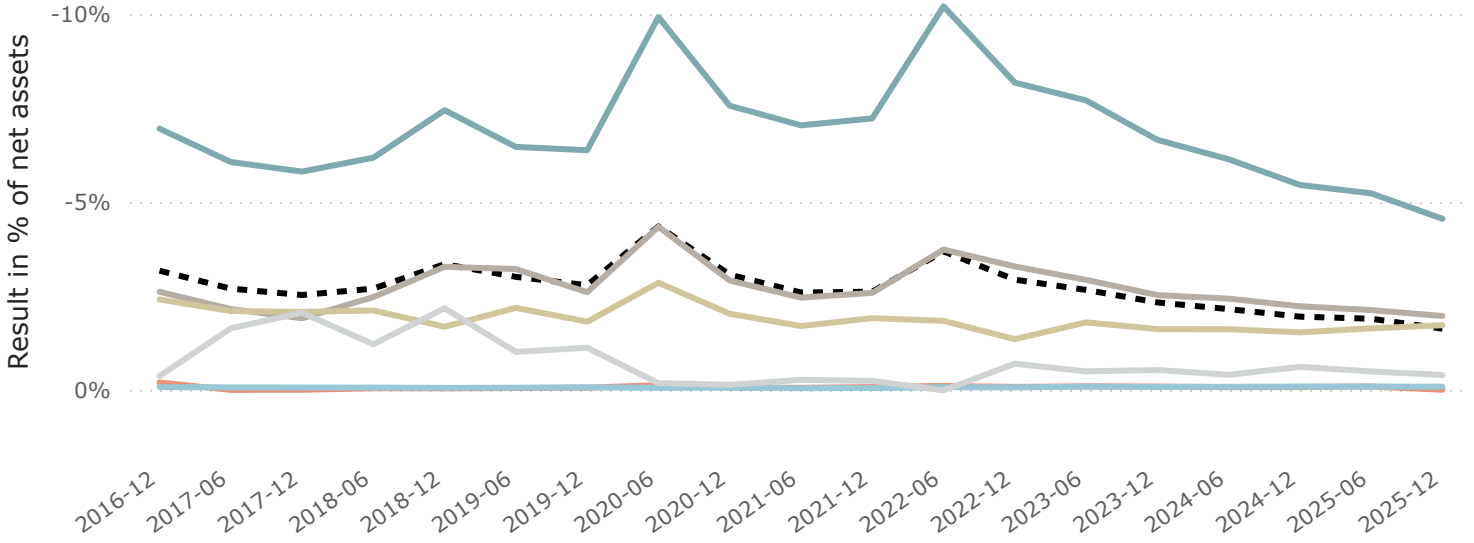


### Interest rates +200bps



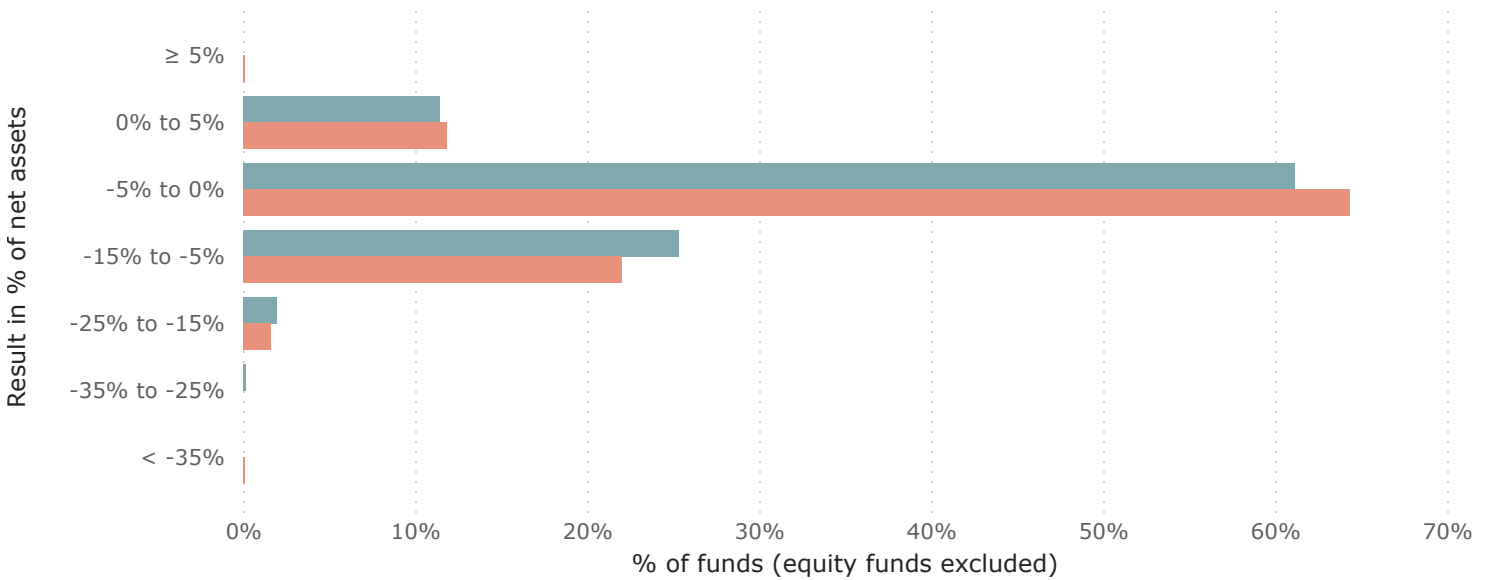
### Credit spreads +100%

● All funds ● Bond funds ● Equity funds ● Mixed funds ● Hedge funds ● MMF ● Other funds



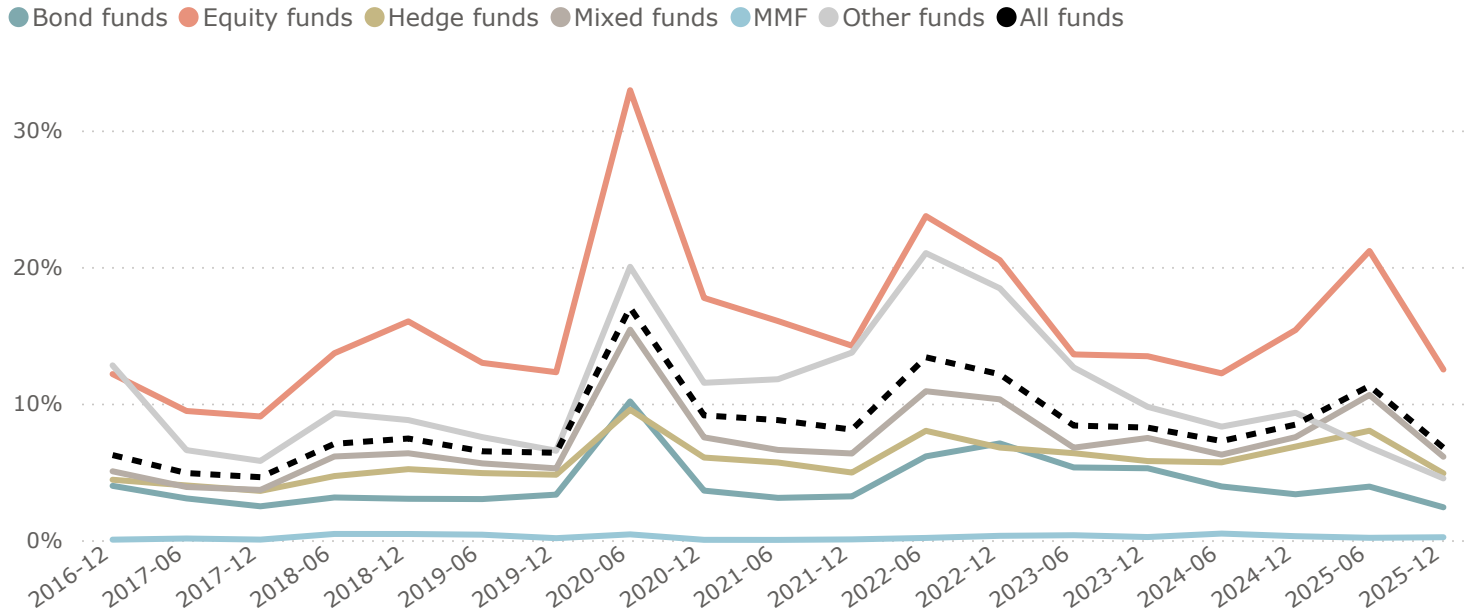
### Credit spreads +100%

● June 2025 ● December 2025



### 4.3.2. Annualised realised volatility

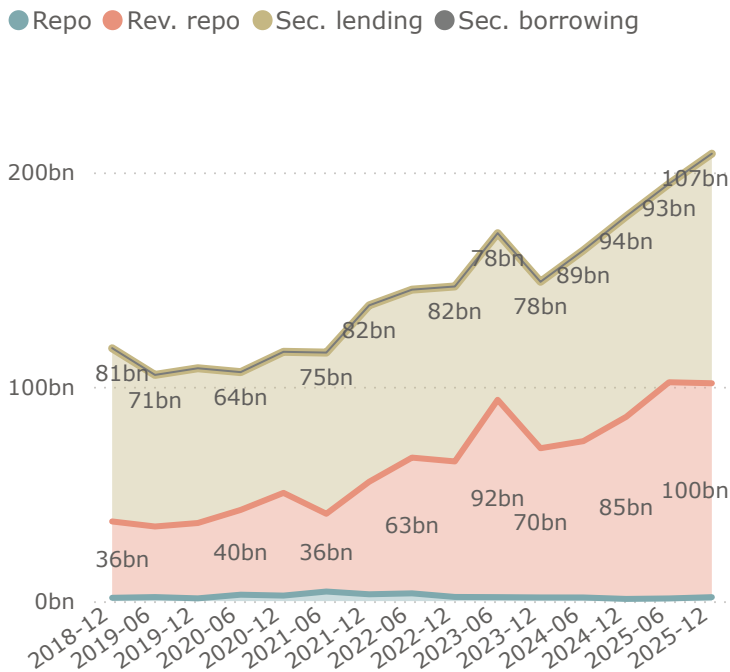
Annualised realised volatility (weighted % of NAV)



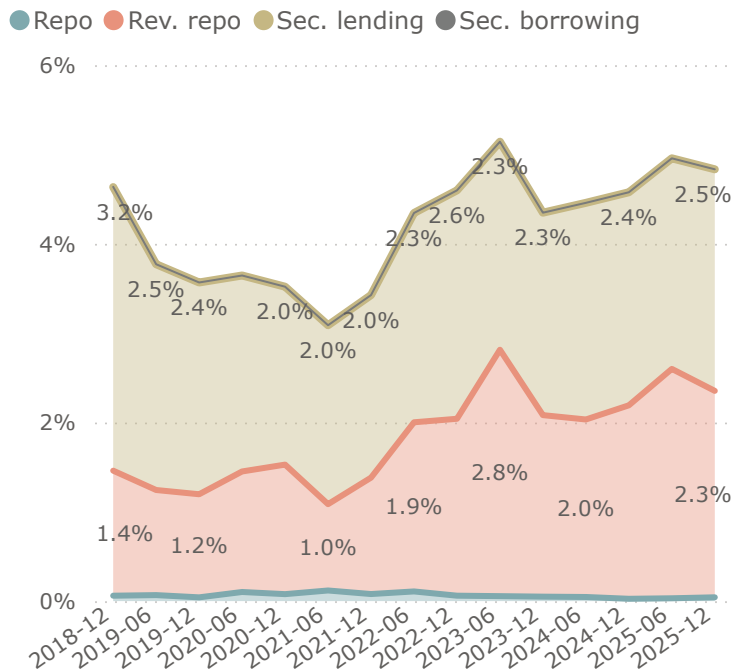
### 4.4. Efficient portfolio management (EPM) techniques

#### 4.4.1. Evolution of volumes and number of active funds by EPM type

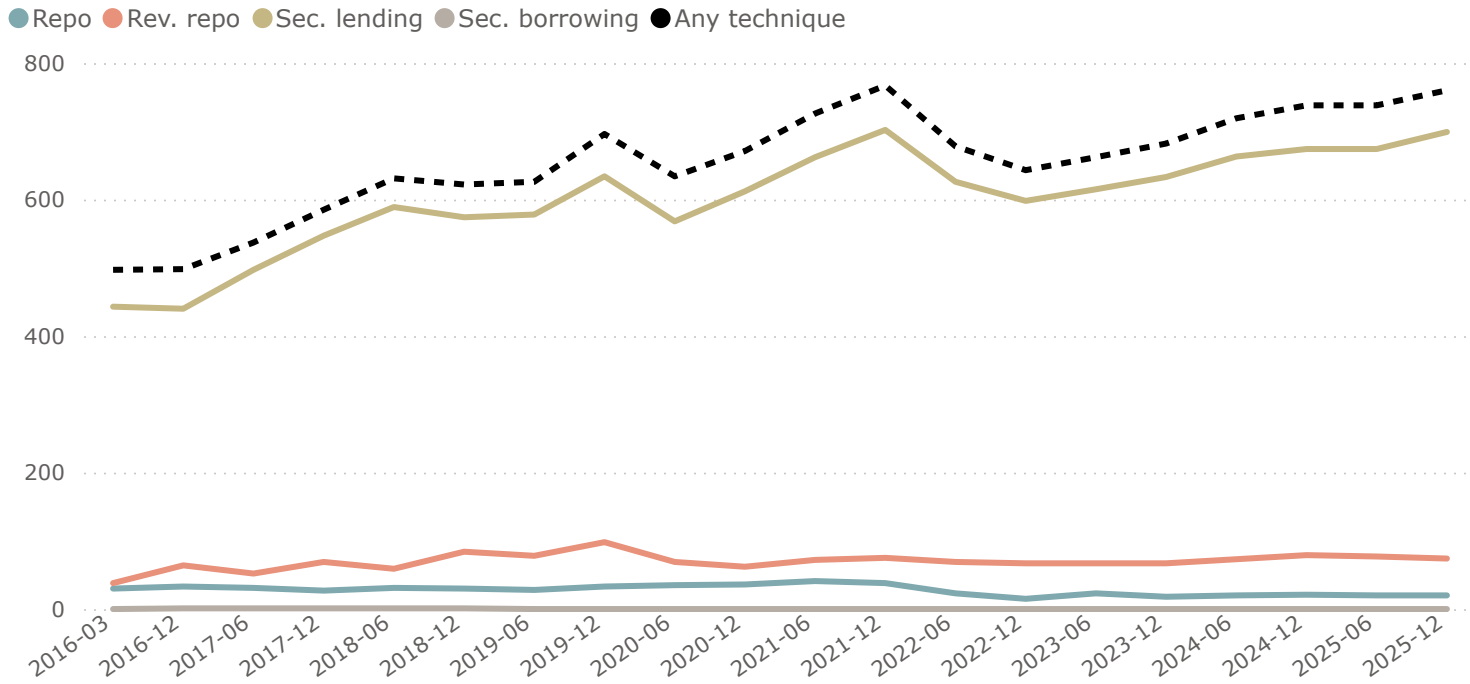
EPM volumes at semester-end (EUR)



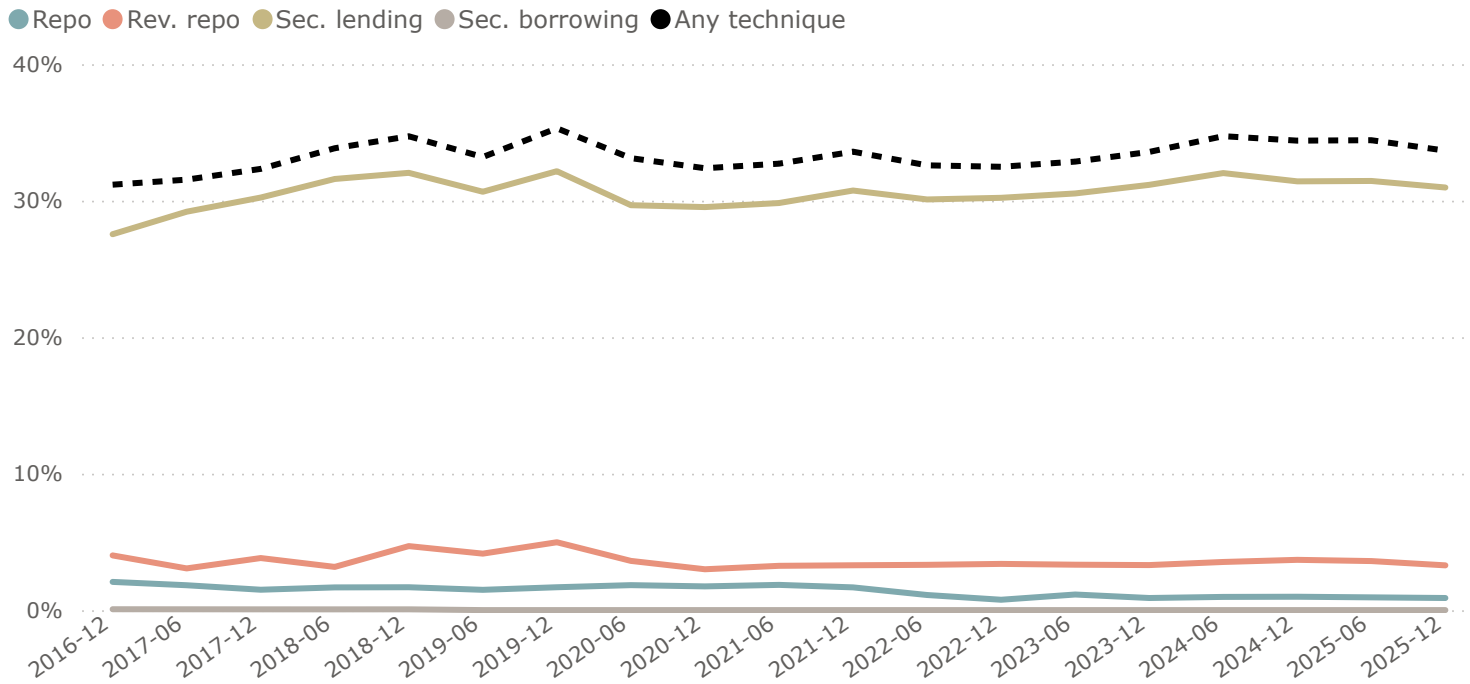
EPM volumes at semester-end (% of NAV)



### Nb. funds engaged in EPM transactions

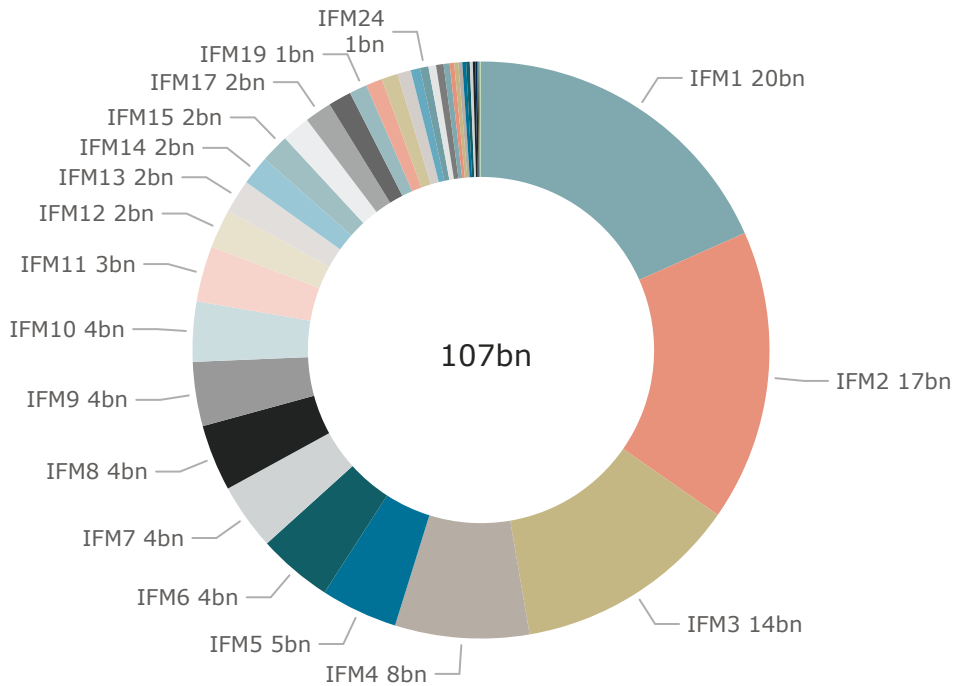


### Share of funds in full reporting scope engaged in EPM transactions

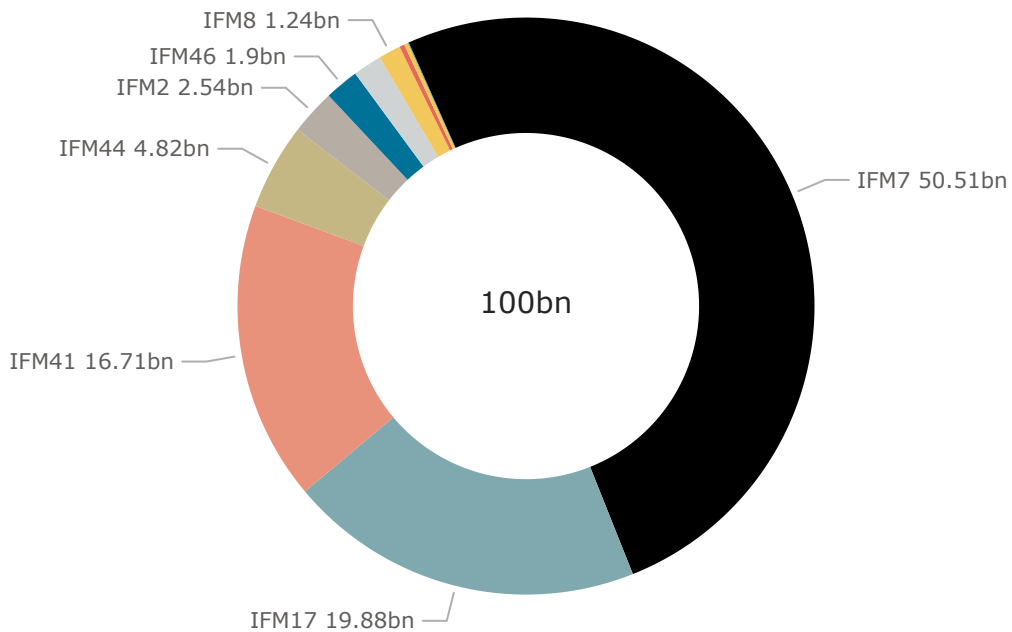


### 4.4.2. Main active Investment Fund Managers (IFMs) by EPM type

#### Securities lending, by IFM



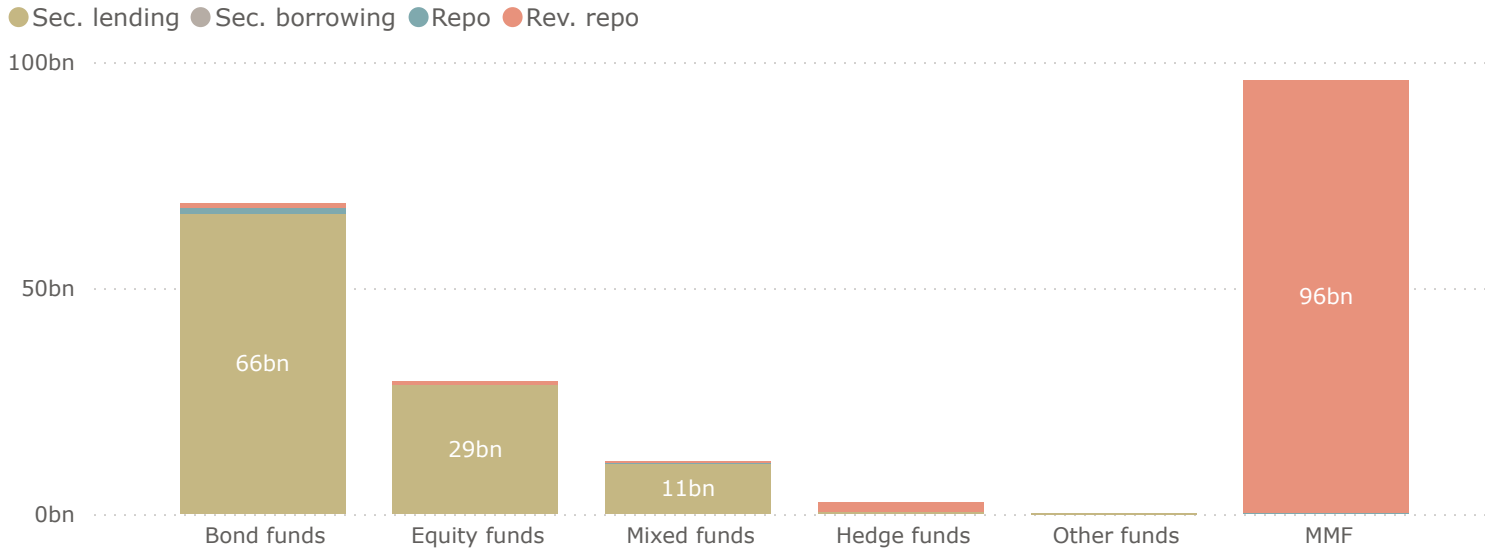
#### Reverse repos, by IFM



Note: Repos are not pictured above, as their volumes are much lower (total EUR 2bn). Similarly to Reverse repos, repos are dominated by a few actors (83% of volumes from funds managed by 3 IFMs).

### 4.4.3. EPM volumes by investment strategy

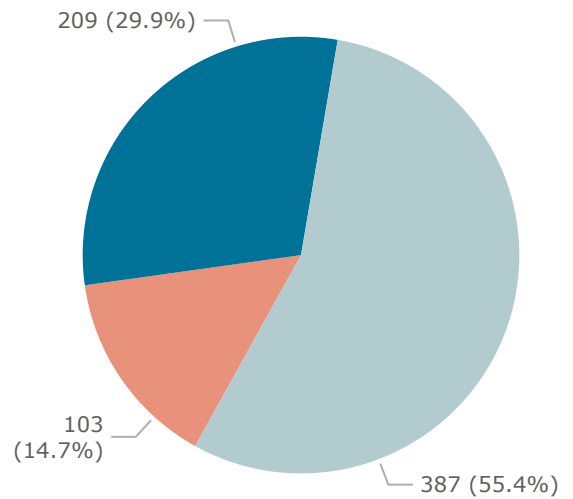
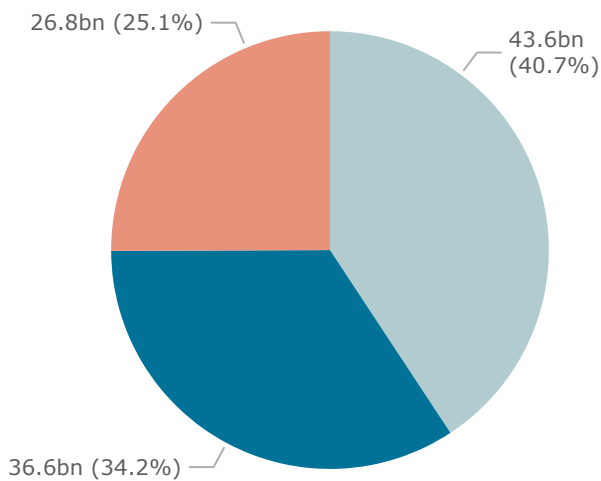
#### EPM volumes by investment strategy



### 4.4.4. Securities lending: Use of Agent lenders and indemnification against borrower default

#### Sec. lending (EUR)

#### Sec. lending (nb. funds)

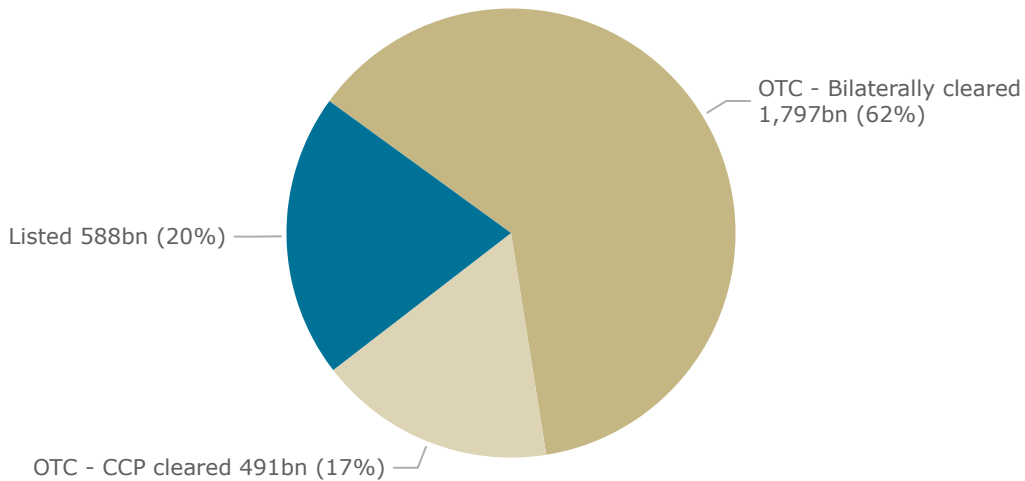


- Agent lender with borrower indemnification
- Agent lender without borrower indemnification
- No agent lender/intermediary

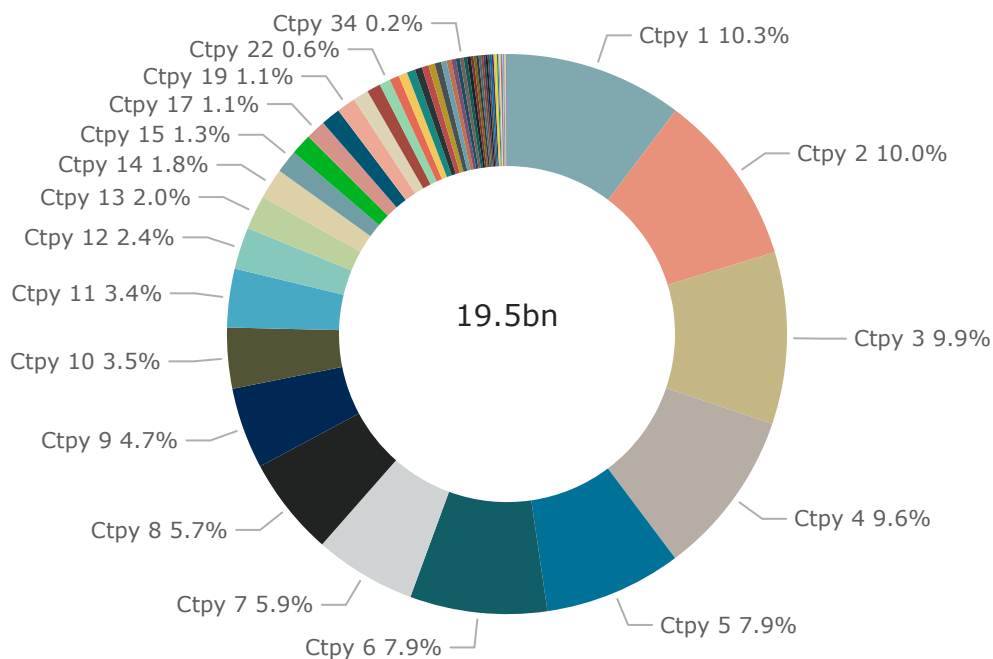


## 4.5. Counterparty risk and collateral in relation to EPM techniques / OTC and traded derivatives

### Nominal amount of derivatives, by trading and clearing venue



### Main counterparties on EPM and OTC derivatives transactions



**Methodology note:** The graph represents the largest counterparties of UCITS in terms of (positive and negative) net counterparty exposure of UCITS in the full reporting scope. More specifically, the main counterparties are determined based on the sum of the absolute values of the net exposures of all UCITS in the full reporting scope to their three counterparties with the largest positive net exposure and to their three counterparties with the largest negative net exposure at semester-end. Counterparties are aggregated at group level rather than at legal entity level. The amount in the center of the doughnut is the sum of the absolute values of the net exposures to these counterparties.

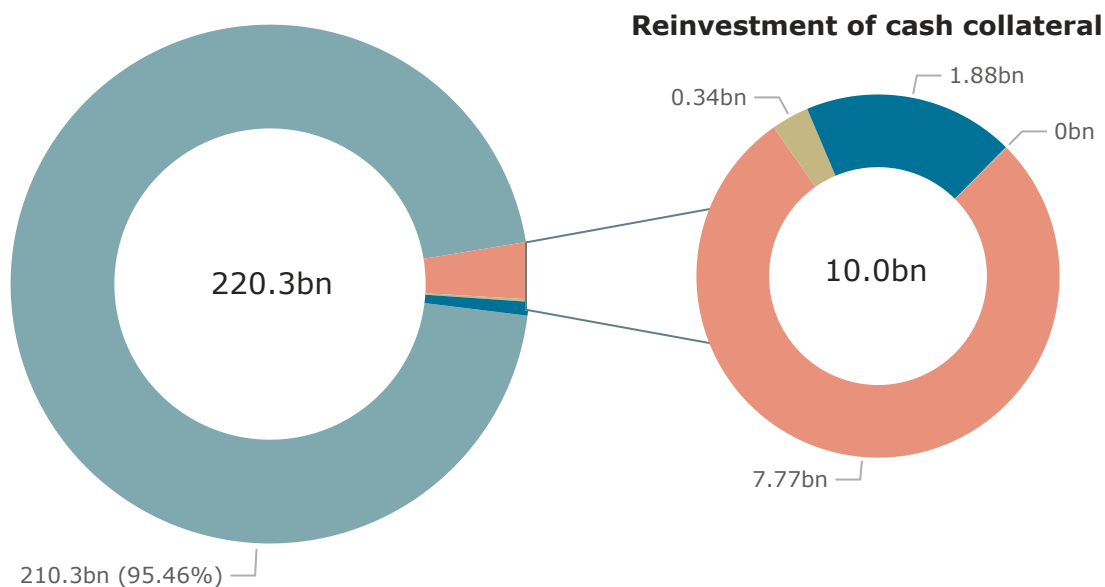


### Number of funds by net positive counterparty exposure (as % of TNA) on OTC derivatives and EPM transactions

% of TNA	EPM	%	OTC	%
0% - 1%	742	97.63%	1,244	88.60%
1% - 2%	7	0.92%	79	5.63%
2% - 3%	1	0.13%	21	1.50%
3% - 4%	2	0.26%	16	1.14%
4% - 5%	0	0.00%	12	0.85%
>= 5%	8	1.05%	32	2.28%
<b>Total</b>	<b>760</b>	<b>100.00%</b>	<b>1,404</b>	<b>100.00%</b>

### Collateral received from EPM / OTC derivative transactions and reinvestment of cash collateral

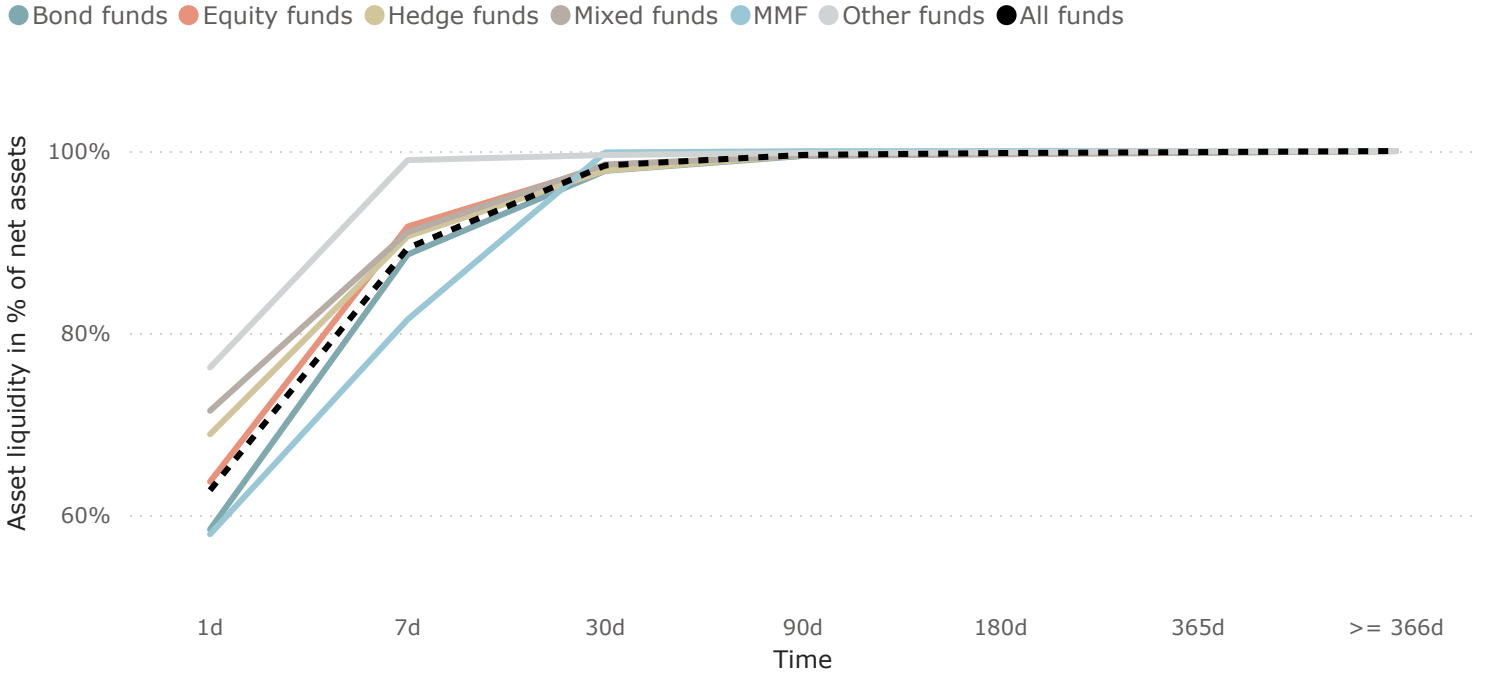
● Non cash collateral ● Deposits ● Gov. bonds ● Short-term MMF ● Rev. repos



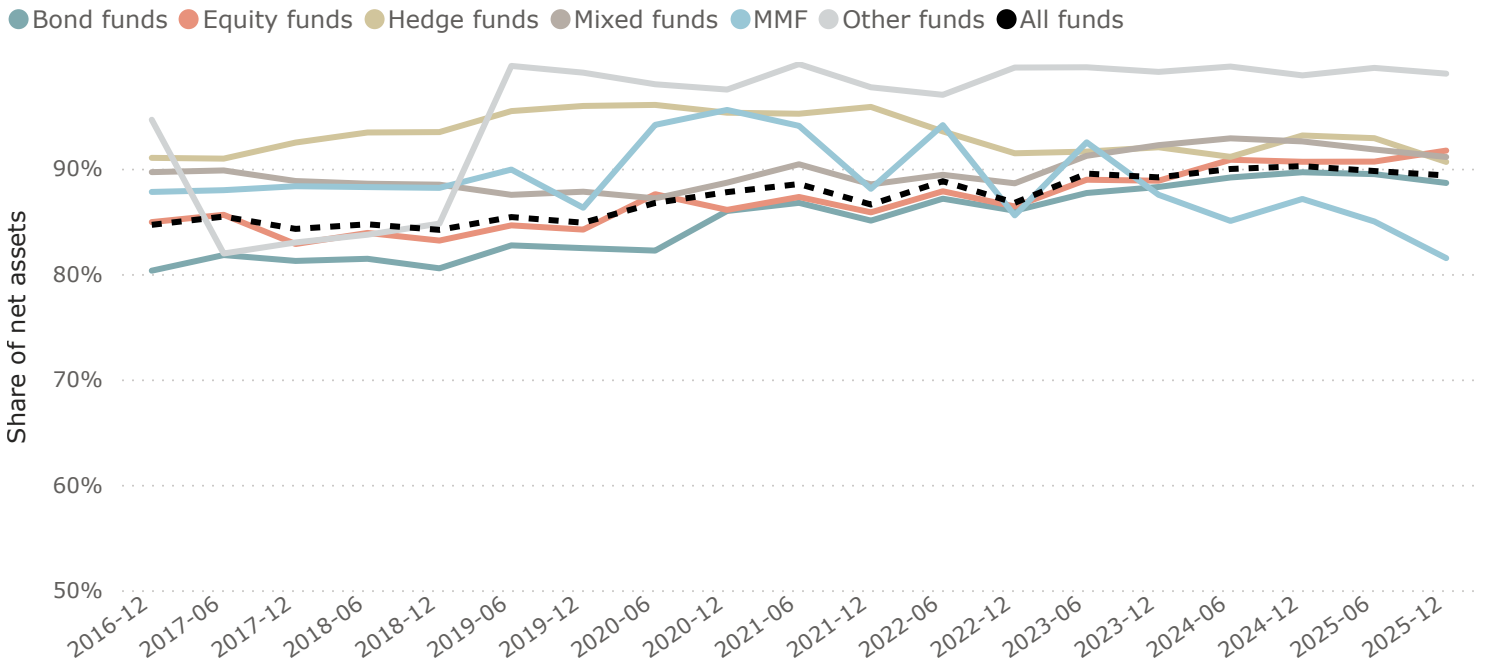
## 4.6. Liquidity

### 4.6.1. Portfolio liquidity at semester-end in normal market conditions

#### Time to liquidate (normal market conditions)



#### Evolution of 7-days liquidity (normal market conditions)

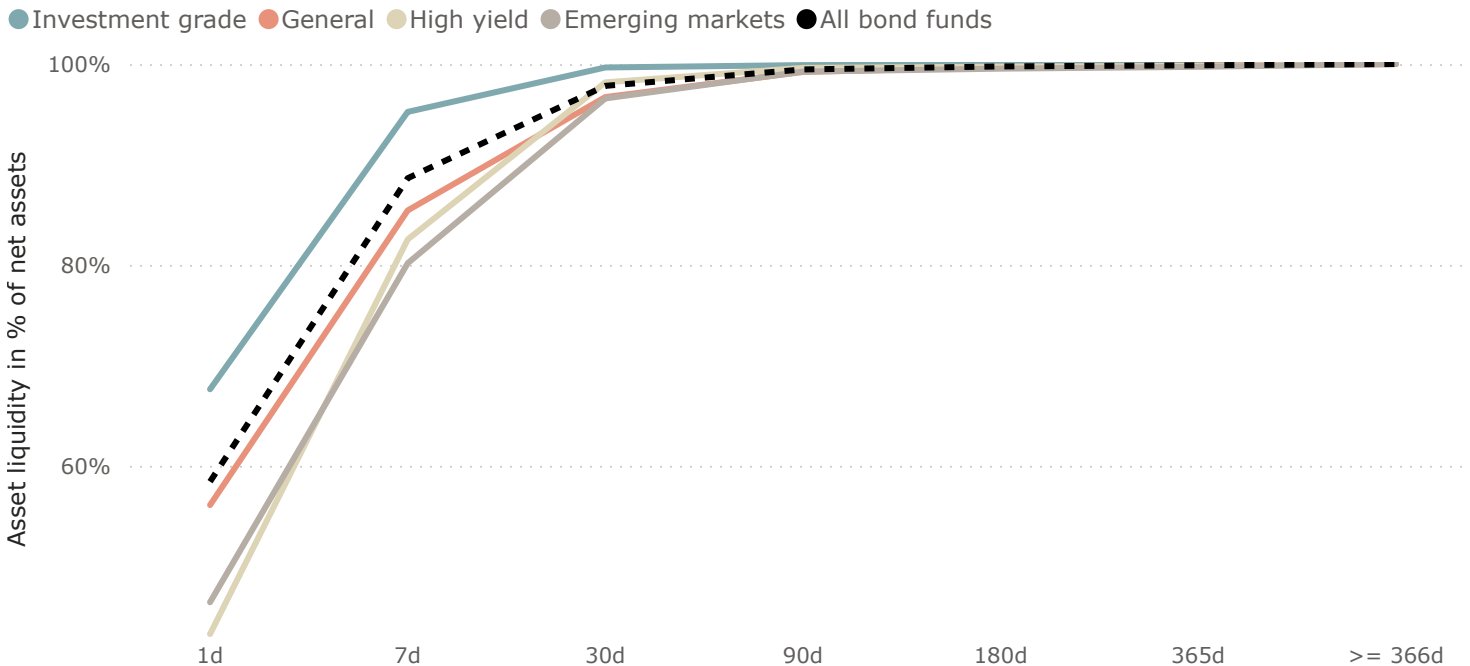


**Note:** The figures are based on the self-assessment of the Investment Fund Managers on the time to liquidate of their funds under normal market conditions.

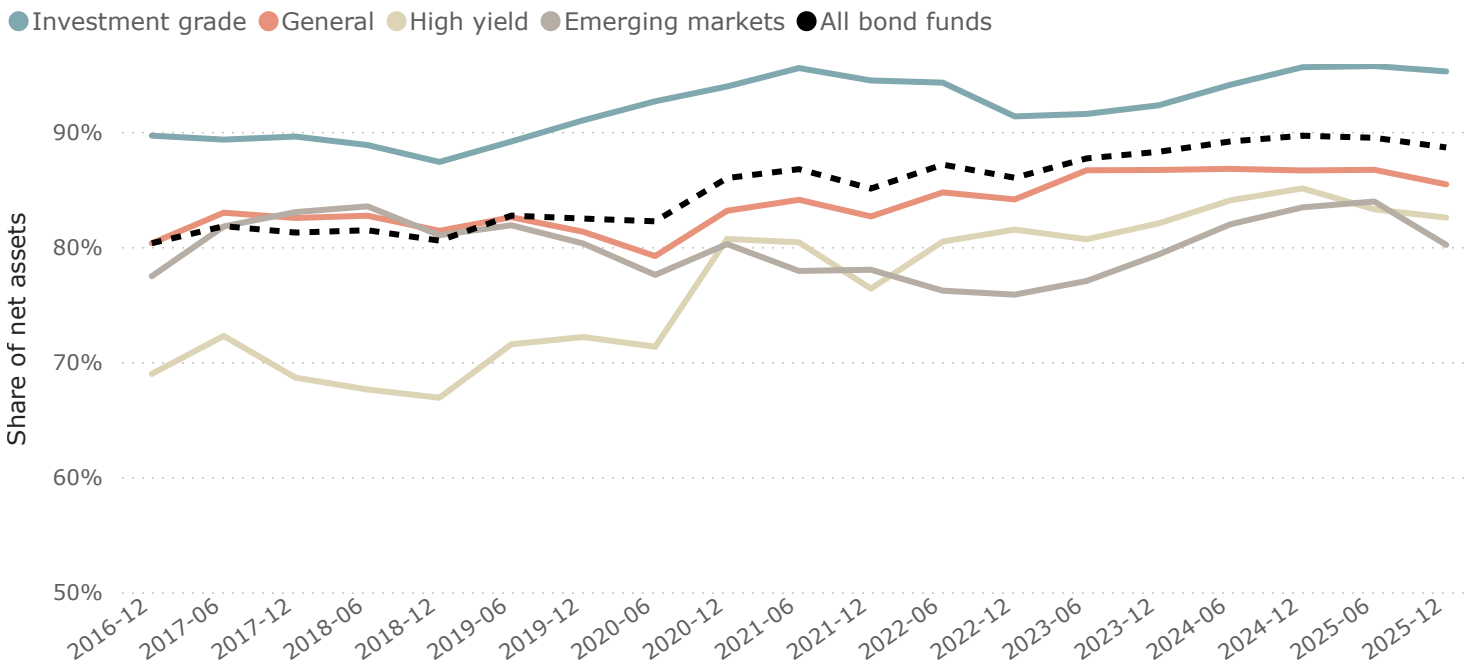


## 4.6.2. Portfolio liquidity of bond funds at semester-end in normal market conditions

**Time to liquidate of bond funds (normal market conditions)**

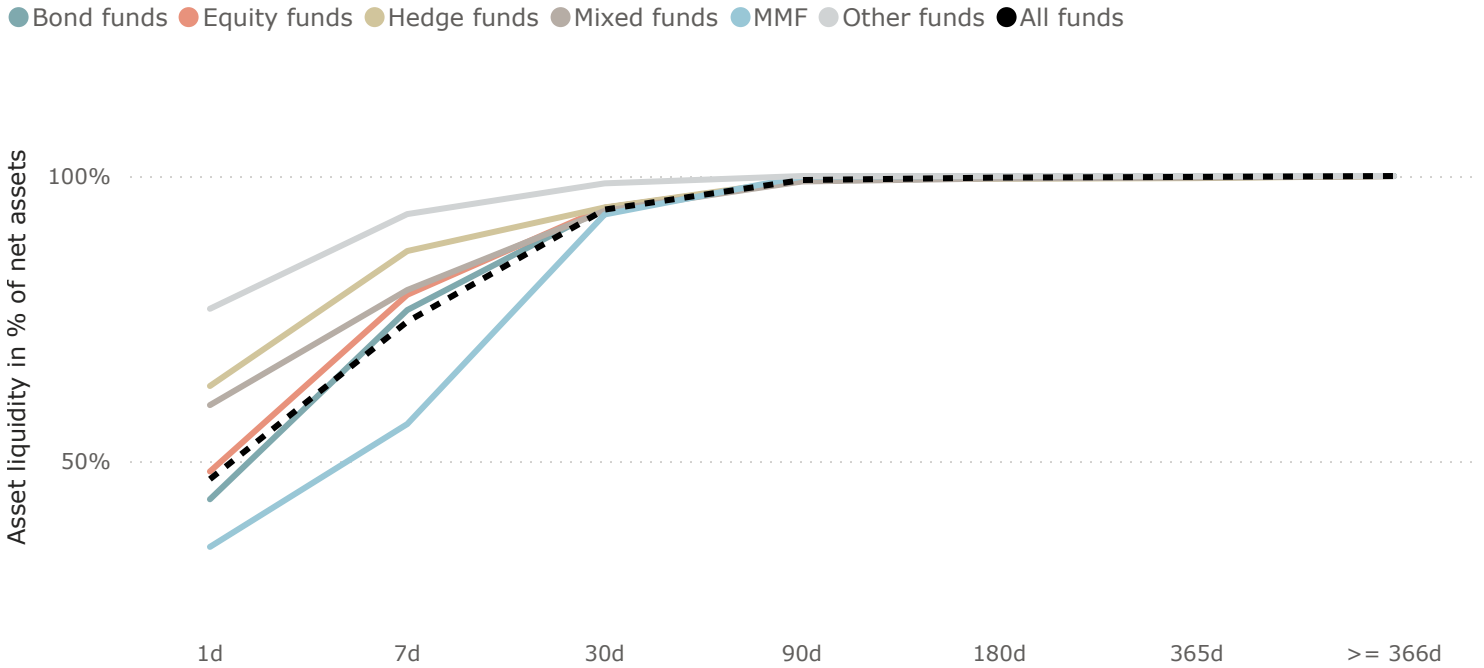


**Evolution of 7-days liquidity of bond funds (normal market conditions)**

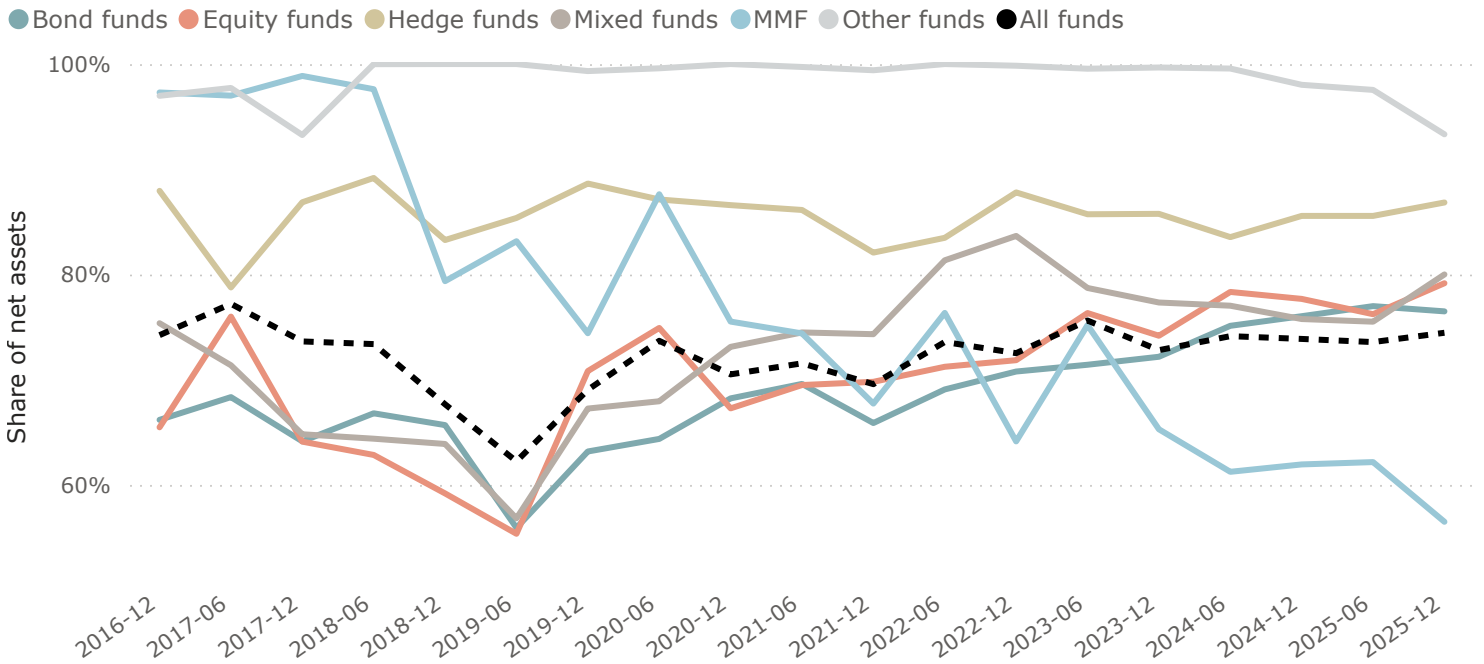


### 4.6.3. Portfolio liquidity at semester-end in stressed market conditions

#### Time to liquidate (stressed market conditions)



#### Evolution of 7-days liquidity (stressed market conditions)



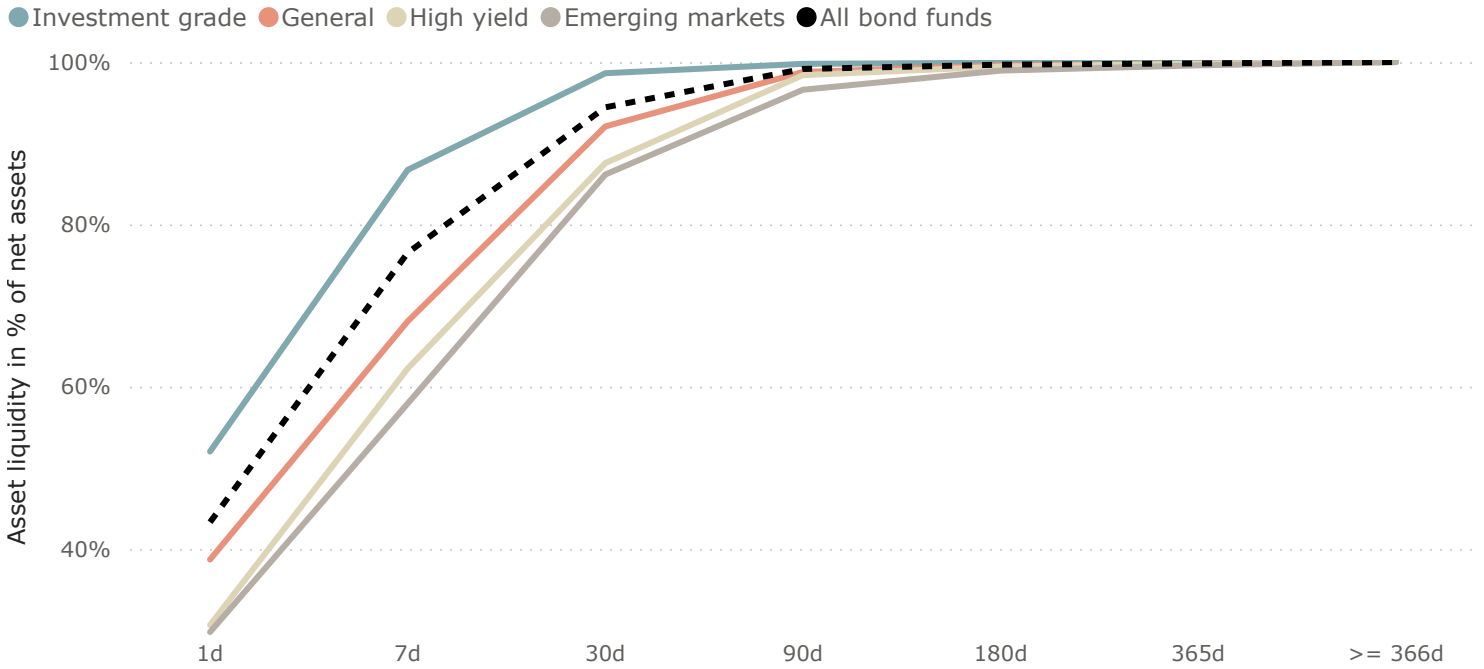
Note:

The liquidity profile under stressed market conditions, which is optional according to the CSSF's guidelines, was reported by 36% of funds in the full reporting scope. More specifically, it was reported by 256 bond funds, 337 equity funds, 51 hedge funds, 137 mixed funds, 30 money market funds and 4 other funds. It is critical to stress that the results are based on different methodologies and/or assumptions.

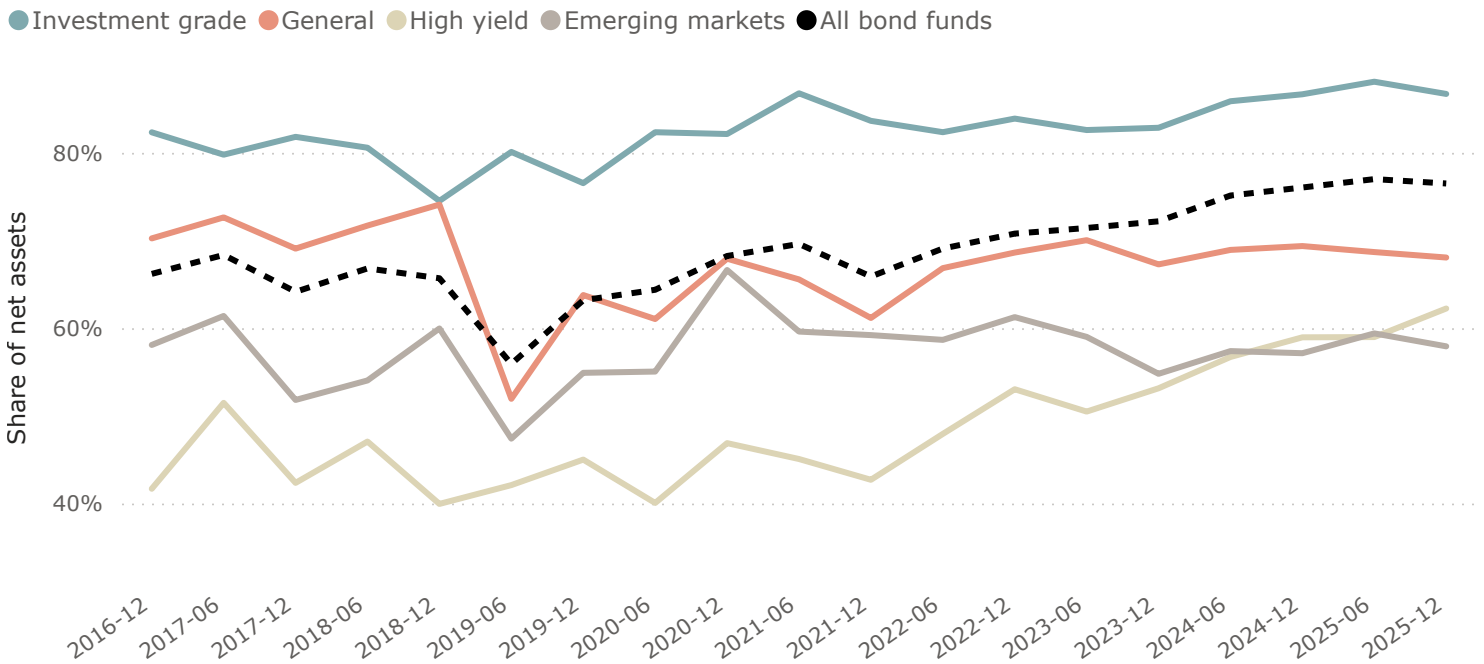


## 4.6.4. Portfolio liquidity of bond funds at semester-end in stressed market conditions

**Time to liquidate of bond funds (stressed market conditions)**

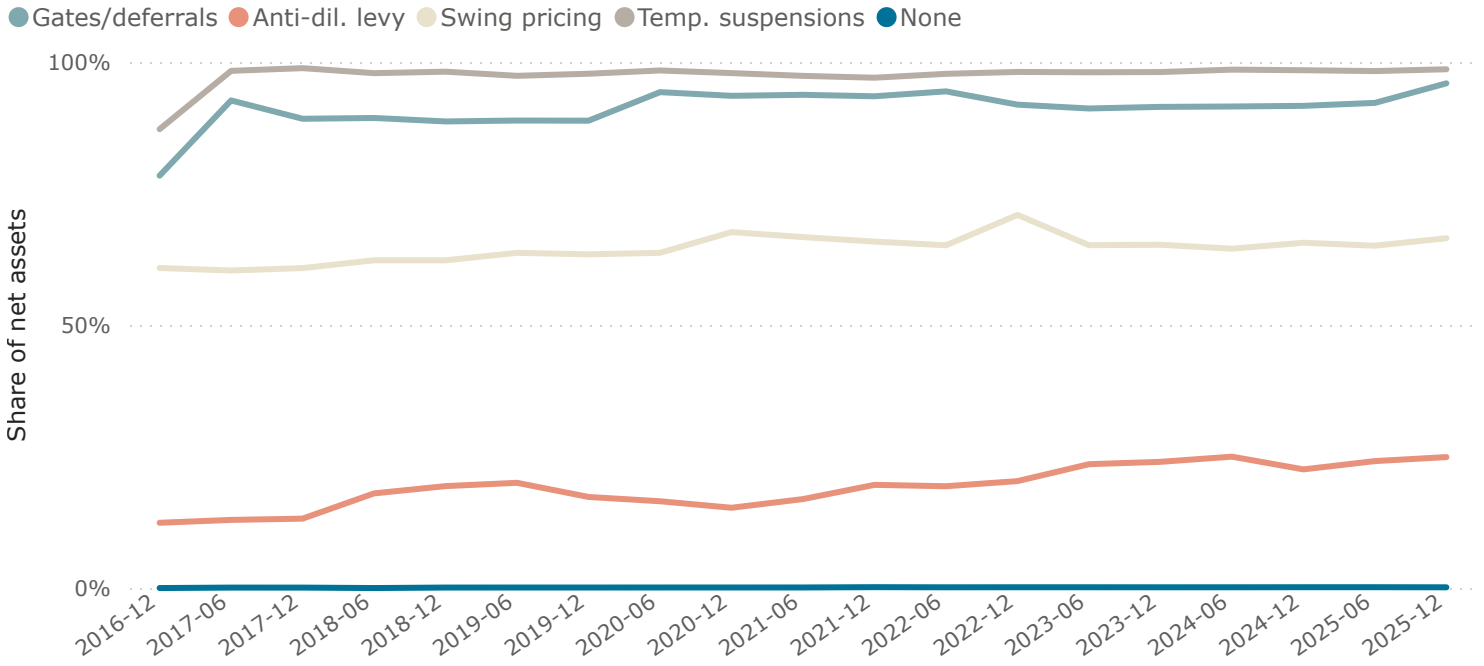


**Evolution of 7-days liquidity of bond funds (stressed market conditions)**

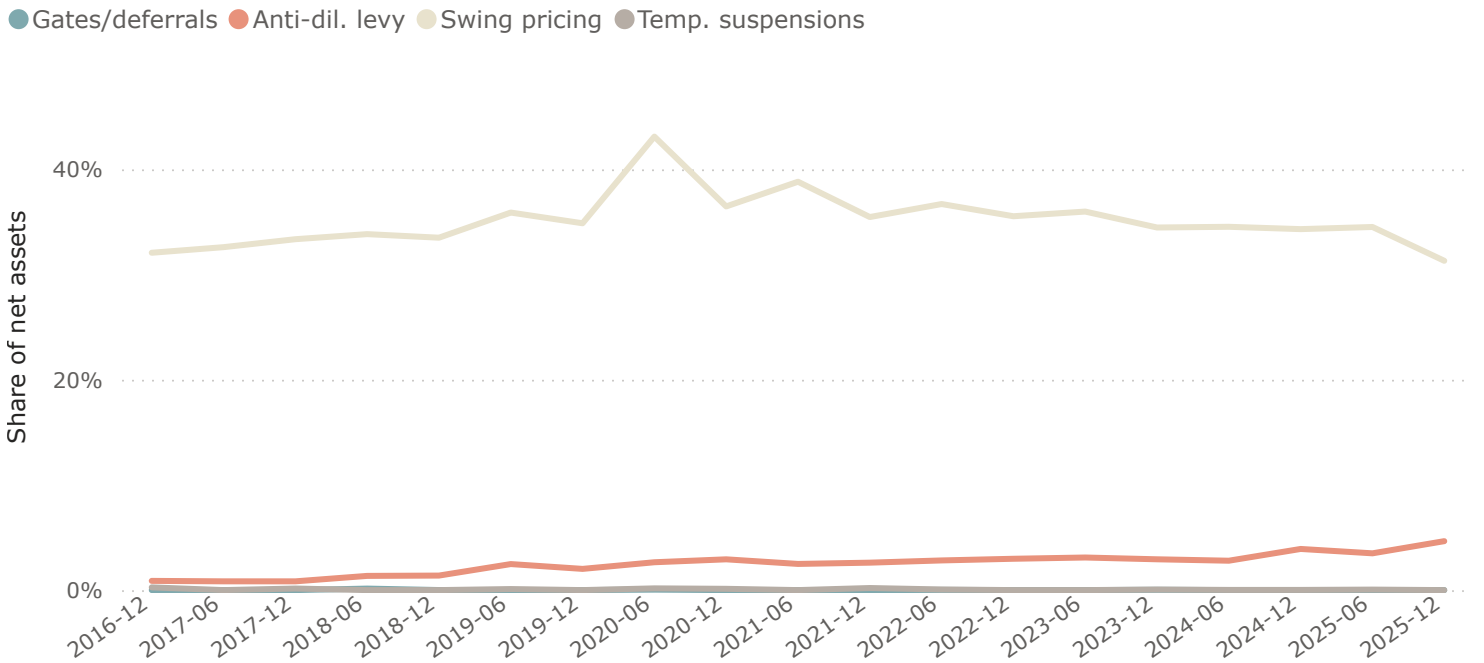


### 4.6.5. Liquidity Management Tools

#### Available liquidity management tools



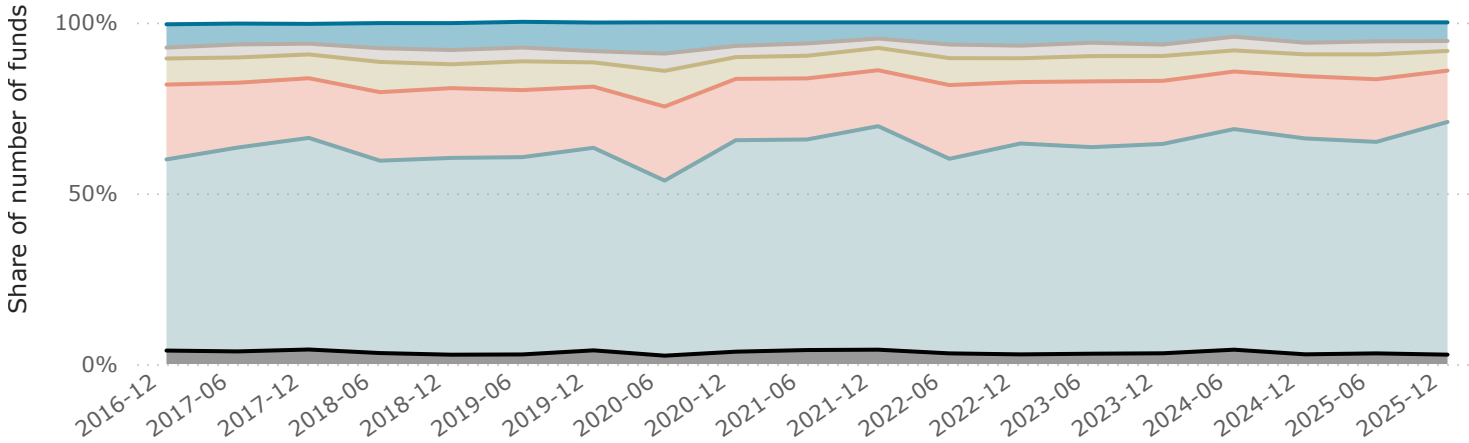
#### Usage liquidity management tools (at least once)



### 4.6.6. Highest net redemption

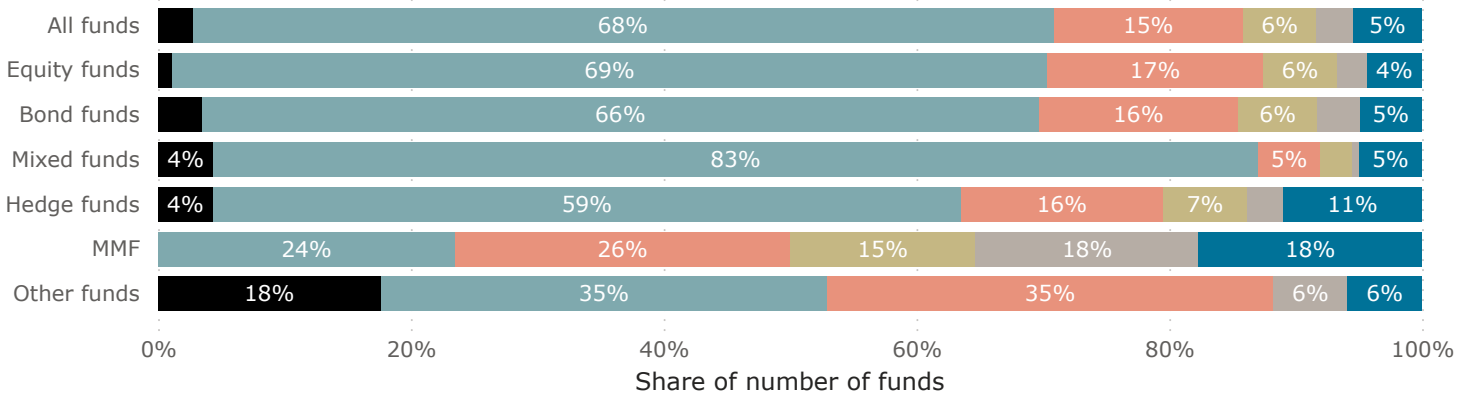
#### Distribution of the highest net redemption

Redeemed net assets: ● 0% ● 0% - 2.5% ● 2.5% - 5% ● 5% - 7.5% ● 7.5% - 10% ● >10%



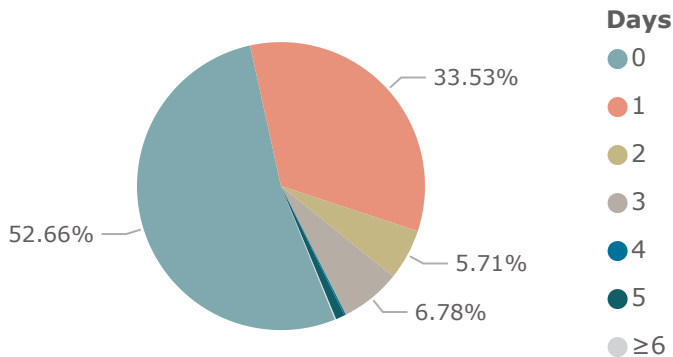
#### Distribution of highest net redemption, by investment policy

Redeemed net assets: ● 0% ● 0%-2.5% ● 2.5%-5% ● 5%-7.5% ● 7.5%-10% ● >10%

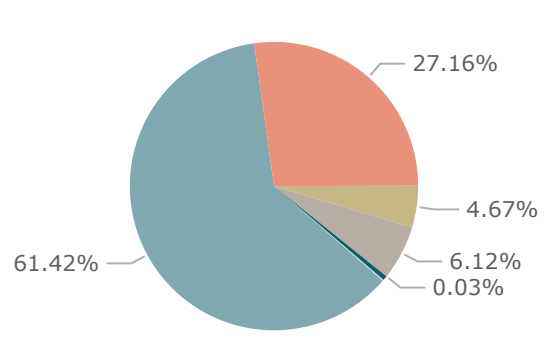


### 4.6.7. Notice periods for redemptions

#### Nb. of funds, by notice periods



#### Net assets, by notice periods



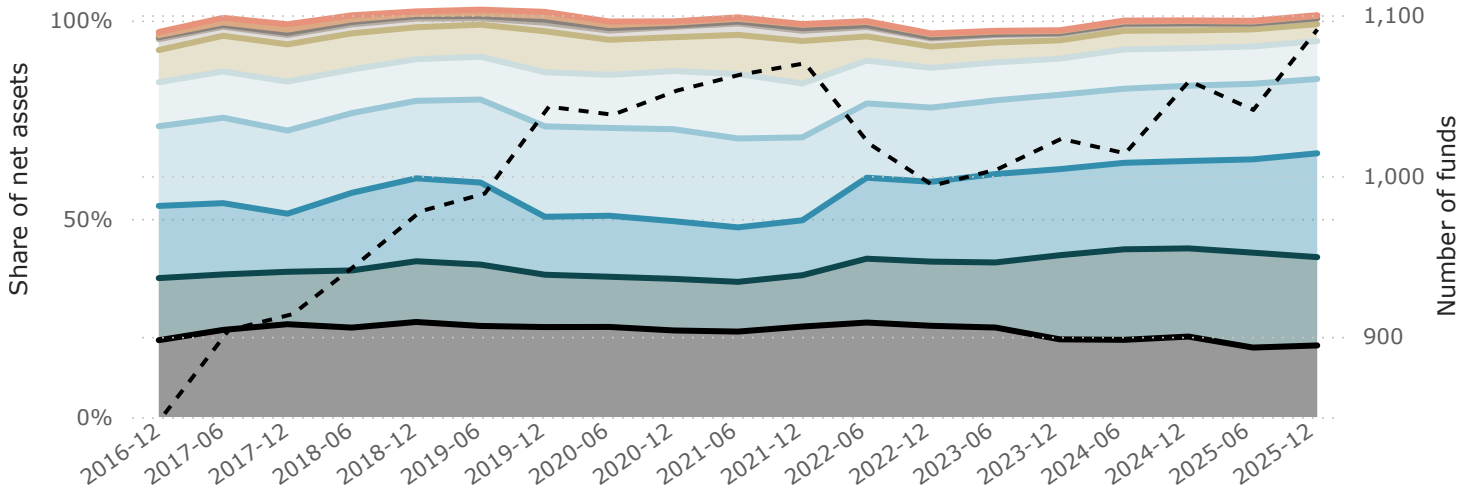
## 4.7. Credit

### 4.7.1. Aggregate credit exposure by internal ratings and by credit spreads

#### Aggregate credit exposure by internal ratings

Rating class: ● 1 ● 2 ● 3 ● 4 ● 5 ● 6 ● 7 ● 8 ● 9 ● 10

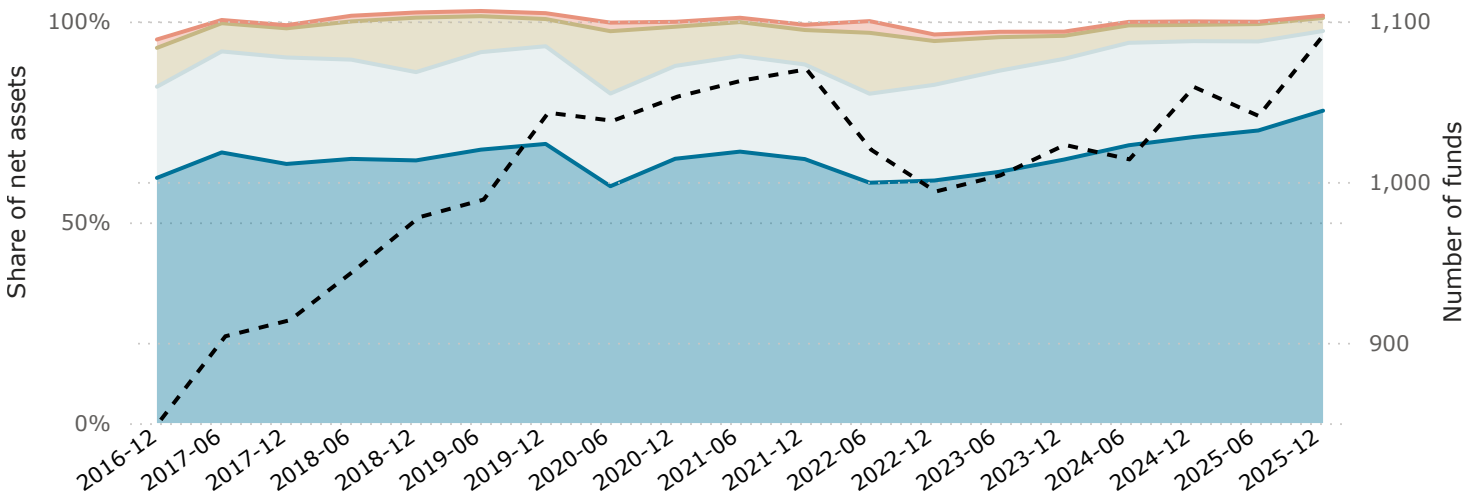
number of funds (rhs): ----



#### Aggregate credit exposure by credit spreads

Credit spread (bps): ● < 100 ● [100, 350[ ● [350, 1000[ ● ≥ 1000

number of funds (rhs): ----



**Note:** As set out in the guidelines, this sub-section is only applicable, with a few exceptions (e.g. funds of funds), to UCITS within the full reporting scope which have a total debt portfolio exposure (direct or indirect) at semester-end greater than or equal to 50% of the UCITS total net assets. Exposures to debt securities should be broken down by credit rating from 1 to 10 with reference to an internal assessment of the credit quality of the said instruments, whereby rating 1 is deemed to be the upper credit rating (i.e. the highest quality) and 10 relates to defaulted securities.



## 5. List of abbreviations

Abbreviation	Meaning
2010 Law	Law of 17 December 2010 relating to undertakings for collective investment, as amended
BCL	Banque Centrale du Luxembourg
CCP	Central Counterparty
CESR 10/788	CESR's Guidelines on Risk Measurement and the Calculation of Global Exposure and Counterparty Risk for UCITS
EM Bonds	Emerging Market Bonds
EPM	Efficient Portfolio Management
FX	Foreign currency exchange
HY Bonds	High Yield Bonds
IFM	Investment Fund Manager
IG Bonds	Investment Grade Bonds
IR	Interest rates
MMF	Money Market Fund
NAV	Net Asset Value
OTC	Over-the-counter
UCITS	Undertakings for Collective Investment in Transferable Securities, subject to part I of the 2010 Law
VaR	Value at Risk

