



Regulatory documents and reports

Practical and Technical
guidance

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Update information

Date	Version	Changes
16/10/2024	1.0	Publication of the document
19/11/2024	1.1	Details on the delegation feature (4.4.1.3)

1. Glossary

1.1. Glossary

Notion	Definition
Bucket	A bucket is a container for objects. S3 stores data as objects within buckets. An object is a file and any metadata that describes the file. Each entity manages its own separate buckets to be used for each report type.
IFMs	Investment Fund Managers
IT Expert	The "IT Expert" is an eDesk specific role that is granted by the "Advanced User" of the entity to the person managing access to the S3 API. A person with this role is responsible for creating, viewing and revoking access keys.
S3	S3 – or "simple storage service" – is the object storage protocol (through a web service interface) used by the CSSF for the file exchange. In this context, S3 simply refers to the protocol for managing object storage and does not rely on any services provided by commercial cloud providers.
Regulatory documents and reports	This term refer to two types of document: Articles of incorporation (AI) and Management Regulations (MR)

2. Introduction

The general objective of this document is to provide practical and technical information on the Regulatory documents and reports (AI/MR) submission to CSSF.

All the entities concerned by AI/MR submission must provide a document to CSSF when they establish or update them. It is strongly recommended that all entities send us the latest version of the Management Regulations or the latest consolidated version of the Articles of incorporation. This will help to create a reliable statistical database on which to carry out consistent analyses.

The entities subject to the External Asset Managers reporting can submit it through two channels: via online form filling (eDesk procedure) or by S3 submission.

The AI/MR received are then sent for publication to Fundsquare.

3. Scope

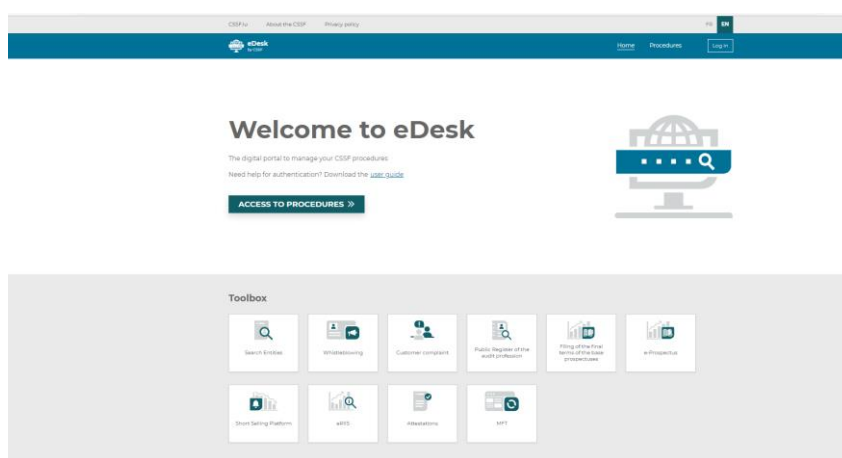
The AI/MRs must be submitted by the fund (self managed) or IFM (management company for UCITS or AIFM for AIFs externally managed). This means that the enrolment process must be done by the entity responsible for the submission of the data.

4. eDesk application

4.1. Authentication and connection

The person in charge of submitting the document is required to have an eDesk account (available with a LuxTrust authentication) and must be linked to the relevant entity. Further details can be found in the User Guide ("Authentication and user account management") from the dedicated section of the CSSF eDesk Portal homepage: <https://edesk.apps.cssf.lu/edesk-dashboard/dashboard/getstarted>.

4.2. eDesk dashboard homepage



The eDesk homepage screen is split as follows:

- The **Header** is the upper part of the screen where you can find:
 - The navigation menu that shows several useful links. "**CSSF.lu**" sends you back to the CSSF website. "**About the CSSF**" and "**Privacy policy**" send you to the dedicated CSSF website sections respectively about CSSF itself and its privacy policy.
 - The **language option** is available on each screen and it is possible to switch between languages throughout the authentication procedure.
 - The "**Log in**" button takes you to the screen to be used to connect to the eDesk portal.
 - The "**Procedures**" button that takes you to the "Log in" page if you are not connected yet or the procedures list.
- The **Toolbox** gathers several e-services (applications) that do not require an authentication.
- The **News** section presents the latest information related to eDesk.
- The **Footer** at the bottom of the screen is non-interactive.

4.3. Access to procedures

Click on the 'Access to procedures' button and search for the AI/MR deposit operation using the 'Investment funds and vehicles / Investment fund managers' filter.

The screenshot shows the 'Procedures' page with a sidebar on the left containing filters. The main area displays a list of results (1-10 of 30). The entry 'Regulatory Documents and Reports' is highlighted with a red box. The sidebar includes an 'Advanced filters' section with 'Entity types' set to 'Investment funds and vehicles / Investment fund managers' and an 'Advanced search' field. The main list includes various documents such as 'Second stage of the ESMA Common Supervisory Action (CSA) on sustainability risks and disclosures in the investment fund sector', 'Alternative Investment Fund Managers Reporting', 'SFDR - Periodic funds/ORPs disclosures', 'SFDR - Precontractual funds/ORPs disclosures', 'SFDR - IFM disclosures', 'Collective Investment Sector Reporting Tool', 'Key Information Document (KID PRIIPs/KID)', and 'Regulatory Documents and Reports'.

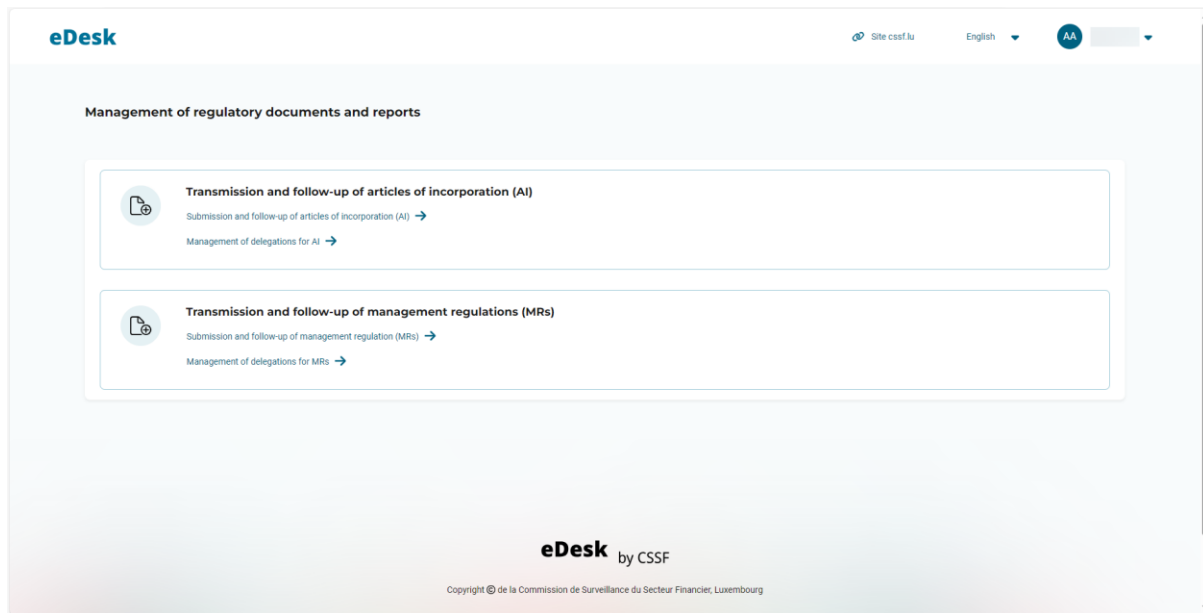
To submit the AI/MR, click on the hyperlink "Regulatory Documents and Reports".

4.4. AI/MR submission

4.4.1. Procedure dashboard

When accessing the procedure, a top banner contains several links and useful information:

- a link to the global eDesk Dashboard (by clicking on the "eDesk" logo).
- a link to the CSSF website ("Site cssf.lu").
- a drop-down list of languages available in the app.
- a drop-down menu for the user profile and the logout button.



The main part of the page has two sections, one relating to AI and another relating to MR. Each of the two sections has two links: One, enabling you to submit and view AI/MR corresponding to the entity for which you are responsible, and another to manage delegations and grant authorization to an external entity to submit AI/MR

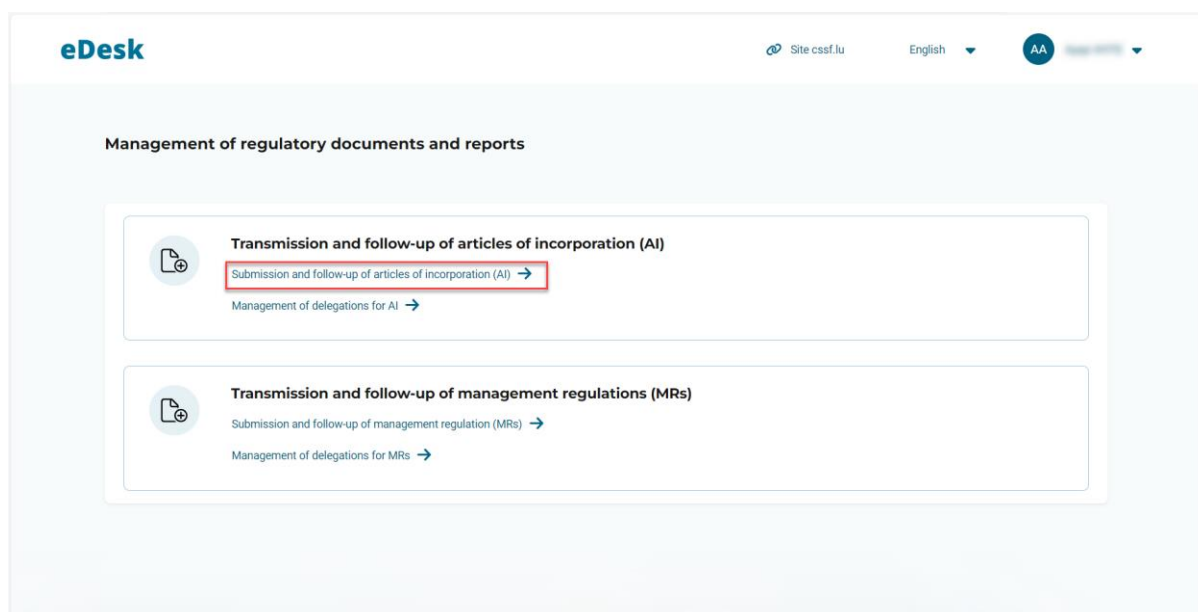
4.4.1.1. Submission of Articles of incorporation/ Management regulations (AI/MRs)

In the following, we will only describe the AI filling procedure. The procedure of filling AI is identical to that for MR.

To make it easier to process your AI/MR, it is strongly advised to use the following nomenclature for all your AI/MR:

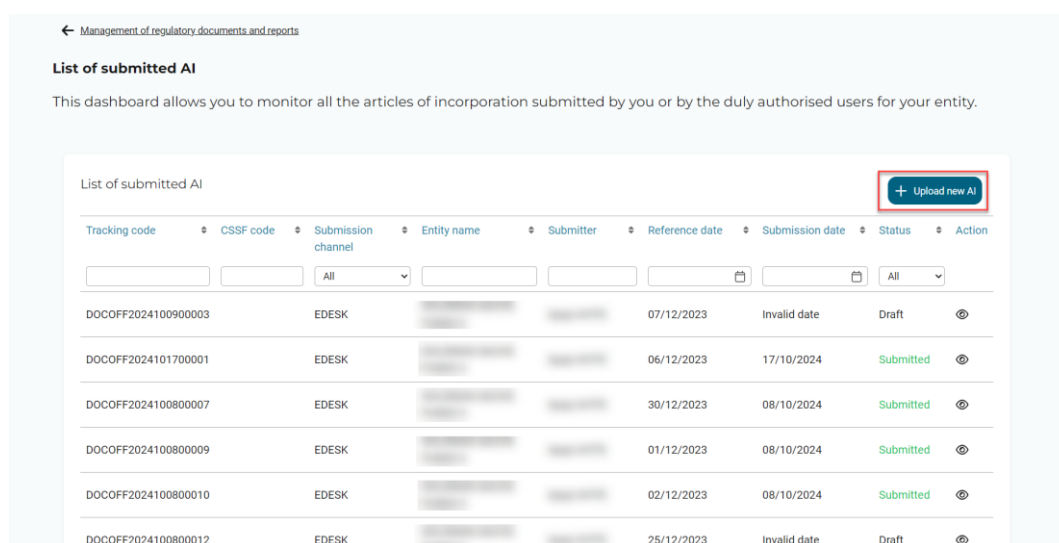
- DOCREP-ENNNNNNNN-YYYY-MM-DD-AI-LL for AI
- DOCREP-ENNNNNNNN-YYYY-MM-DD-MR-LL for MR

To start the submission process, click on the "Submission and follow-up of articles of incorporation (AI)" link.

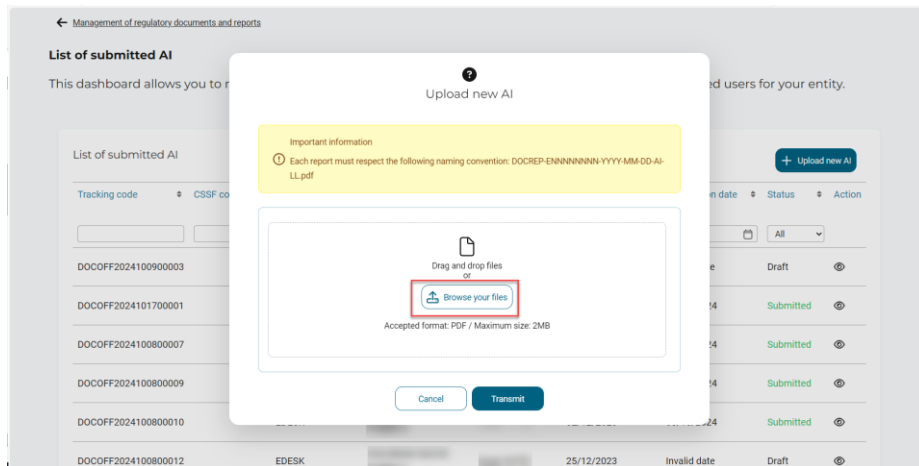


- Submission and follow-up of articles of incorporation (AI)

The list of all submitted AI is displayed. To submit an AI, click on the "Upload a new AI" button.

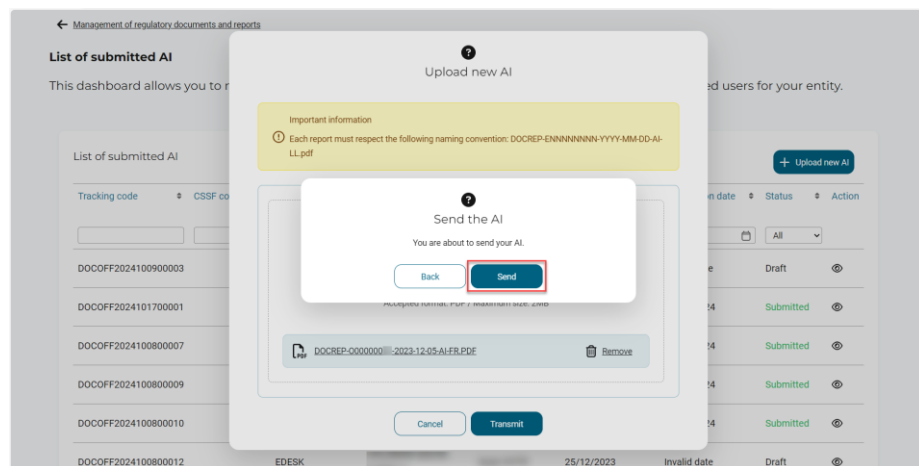


- Upload new AI



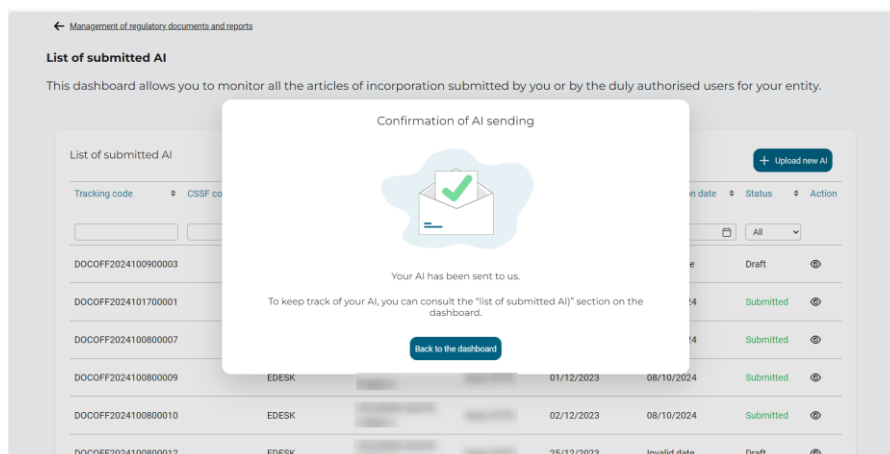
This view allows the user to upload the document in pdf format. Click on the “Browse your files” button to access your local directory and select the document to upload. Once the document has been added, click on the “Transmit” button to submit the uploaded document.

A confirmation pop-up is displayed. When the Send button is clicked again, the submission confirmation message is displayed.



- Confirmation of AI sending

This screen shows that your document has been submitted to the CSSF



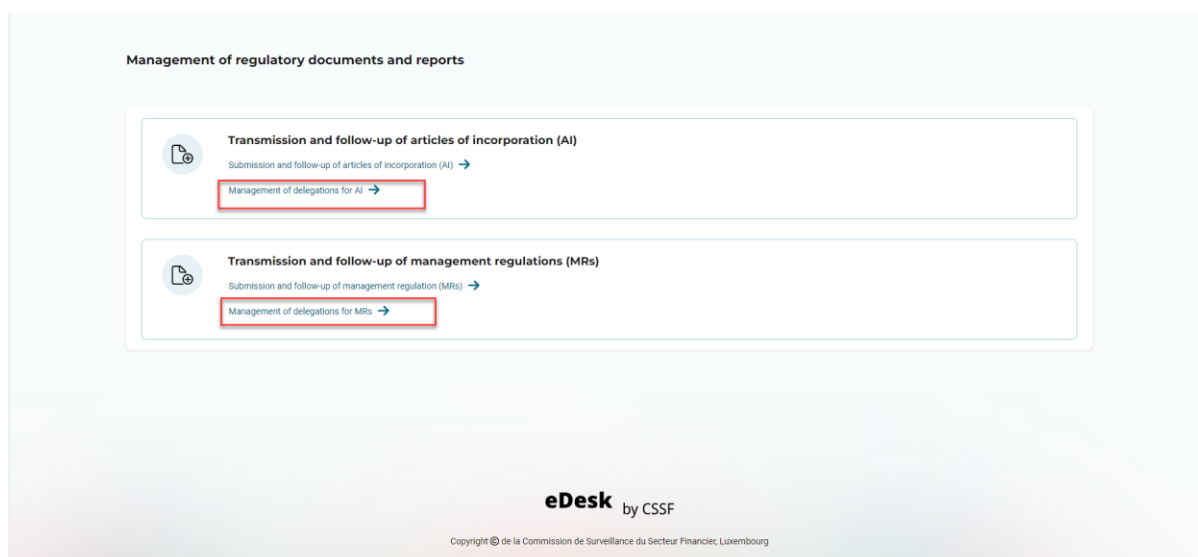
4.4.1.2. Follow up of articles of incorporation (AI) or management regulations (MRs) submitted

The link "Submission and follow-up of articles of incorporation (AI)/ "Submission and follow-up of management regulations (MR) allows you to view all the AI/MR filed for the entity. AI/MR are displayed from the most recent to the oldest date. This space allows you to consult the AI/MR you have transferred, as well as all the AI/MR transmitted by the various other people in your entity.

4.4.1.3. Management of delegations for AI/MRs

The "Management of delegations for AI" and "Management of delegations for MRs" links allow a delegator (user of an entity) to give the possibility to a delegate (user of a third entity) to use eDesk to file an AI/MRs on his behalf.

To carry out this delegation, the delegator clicks on the "Management of delegations for AI/MRs" link.



The following screen appears:

← Management of regulatory documents and reports

Management of delegations for the AI

You can delegate the upload and transmission of the AI to one or several delegate(s). A dashboard is available to manage all your delegations.

Delegation list

+ Create a new delegation

First name	Name	E-mail	Role	Status	Action
			View all	View all	

No data

eDesk by CSSF

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Click on the “Create a new delegation” button, a pop-up window appears:

← Management of regulatory documents and reports

Management of delegations for the AI

You can delegate the upload and transmission of the AI to one or several delegate(s). A dashboard is available to manage all your delegations.

Delegation list

+ Create a new delegation

General Information

E-mail address
users781@cssf.lu

Communication (Optional)
Can you please submit our documents for the funds below to the CSSF?

Delegated Funds

☐ Select all

Selected (4)	CSSF Code	Name
<input checked="" type="checkbox"/>	04685	BLACKROCK STRATEGIC FUNDS
<input checked="" type="checkbox"/>	014747	BLACKROCK PRIVATE MARKETS
<input checked="" type="checkbox"/>	03	BLACKROCK GLOBAL FUNDS
<input checked="" type="checkbox"/>	07627	BLACKROCK GLOBAL INDEX FUNDS

Total number of elements: 1 - 4 of 4

Results per page: 10

Cancel Submit

- Enter the e-mail address of the delegate (natural person) who will be responsible for filing AI documents on behalf of the delegator's entity.
- Add a communication (optional)
- Select the funds under management for which you wish to grant a delegation
- At the end, click on the Submit button

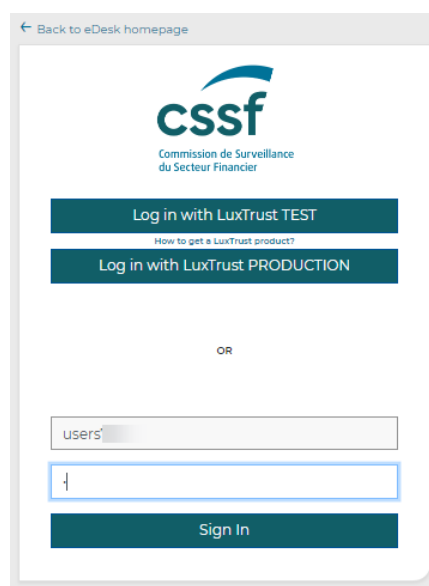
The delegate receives an e-mail with the subject line : “Invitation to contribute on CSSF eDesk Regulatory documents and reports for funds”

From: To: Subject: Invitation to contribute on CSSF eDesk Regulatory documents and reports for funds

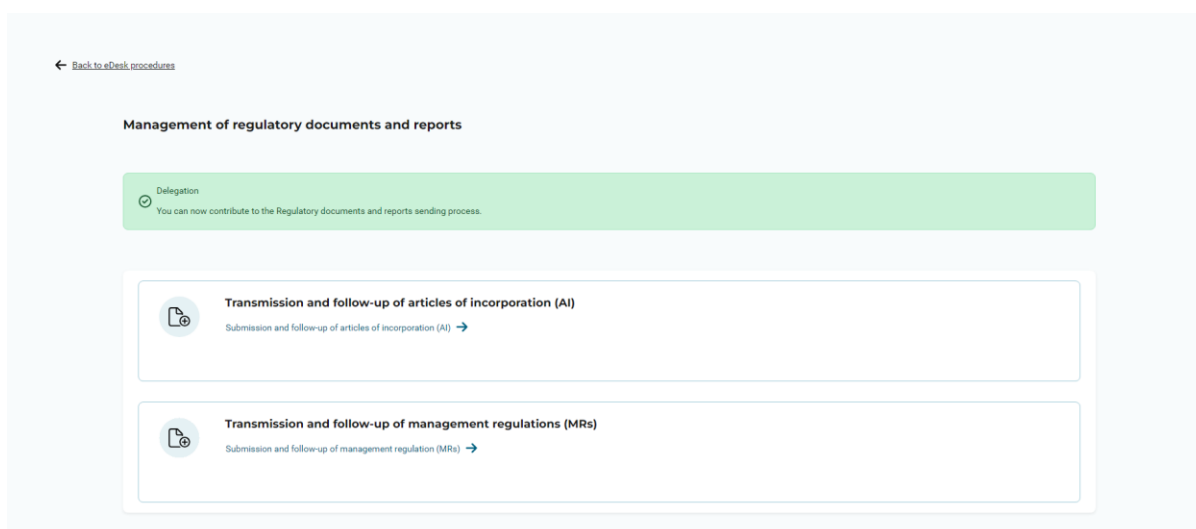
The body of the email is as follows:

Dear Madam, Dear Sir,
You have been invited within CSSF eDesk portal to contribute and submit on Regulatory documents and reports for funds (04685, 07627, 03, 014747) by user\$500 user\$500 (BLACKROCK (LUXEMBOURG) S.A.) who added the following communication :
Can you please submit our documents for the funds below to the CSSF?
In order to react to this invitation, log in **within 72h** to eDesk portal at the following url : <https://edesk.val.cssf.lu/3opc-edesk-decoff-delegation/validation/949ace6d-0895-4124-b06c-a7f5432c056b>
Please note that you will be allowed to accept this delegation provided that the current email address (users781@cssf.lu) is being used as professional email address for one of your active entity links within eDesk portal.
Yours faithfully
Commission de Surveillance du Secteur Financier

To accept the delegation and submit the documents on behalf of the delegator, the delegate must click on the link contained in the e-mail. The delegate will be asked to log in to his edesk account using his credentials.



Once connected, the following screen is displayed and the delegate can submit AI/MR to the CSSF on behalf of the delegator entity by following the submission process



5. S3 File collection

5.1. S3 system reporting technical specifications

Method of transmitting reports via Application Programming Interface can be found on our website following the [link](#).

In the eDesk IT management console, the "IT Expert" must create a bucket "**Regulatory Documents and Reports**"

The "IT Expert" is in charge of monitoring all S3 credentials that might be created. The sharing of S3 credentials and file upload through a third party remains the role responsibility of the entity

5.1.1. Reporting file

5.1.1.1. Reporting format

The AI/MR Document shall be reported in the PDF format. There is no json schema to transmit with the PDF. The information about the submitting entity must be added to the PDF's nomenclature.

The PDF must be compressed in a ZIP format.

During the file submission the system performs a check on the zip naming, its format and its contents.

5.1.1.2. Naming conventions

- **ZIP file**

The mandatory file naming convention for .zip files is specified below.

Format: **DOCOFF-ENNNNNNNNN-UUID.zip**

Code	Meaning	Structure	Authorised value
DOCOFF	Reporting type	Char(6)	'DOCOFF' (constant)
-	Separator	Char(1)	'-' (constant)

E	Reporting entity	Char(1)	Entity type : 'O', 'K', 'V'
NNNNNNNN	Identification number	Number (8)	00000001...99999999 (CSSF code of the entity)
-	Separator	Char(1)	'-' (constant)
UUID	Unique identifier (ReportUid)	UUID format	Unique identifier following the rfc 4122 norm
.zip	Extension	Char(4)	.zip (constant)

UUID specificities

The **UUID** is necessary to uniquely identified a report. It is also used to prevent a file to be processed several times.

A ZIP file with the same UUID of another ZIP file concerning the same entity will be rejected with the error DOCOFF007 (cf. [chapter 5.1.2.2.3](#)).

The expected format of an UUID is:

XXXXXXXX-XXXX-XXXX-XXXX-XXXXXXXXXXXX

where each X data can have a value from 0 to 9 or from a to f (hexadecimal authorised characters).

You can find more information about the UUID on [Universally Unique Identifier \(UUID\)](#).

JSON report

No JSON file required in zip folder for AI/MR submission.

- **PDF file**

The pdf file must be transmitted with the naming convention:

- For AI: DOCREP-ENNNNNNNN -YYYY-MM-JJ-AI-LL.pdf.

Example:

Archive	DOCOFF-O0000NNNN-4823ac4f-0175-449e-af97-83ec72dfc805. zip
PDF file	DOCREP-O0000NNNN-2024-12-31-AI-FR. pdf

- For MR: DOCREP-ENNNNNNNN -YYYY-MM-JJ-MR-LL.pdf.

Example:

Archive	DOCOFF-O0000NNNN-4823ac4f-0175-449e-af97-83ec72dfc806. zip
---------	---

PDF file	DOCREP-O0000NNNN-2024-12-31-MR-FR.pdf
----------	---------------------------------------

5.1.1.3. Submission process

The ZIP file MUST be uploaded to the “submission” folder in S3. No upload is allowed into other folders (e.g. the “feedback” folder is only dedicated to CSSF feedbacks).

5.1.1.4. ZIP technical specifications

Reporting file must be transmitted via a compressed .zip format containing one eligible AI/MR in pdf format.

Here are the specifications for ZIP archive:

Compression algorithm	RFC 1951 (DEFLATE Compressed Data Format Specification version 1.3)
Multi-volume archives (multi-part zipfile)	No
Maximum size of a file in the archive	N/A
Codepage	UTF-8

5.1.2. CSSF feedback file

It is up to the submitter to monitor transmission correctness.

A feedback file in JSON format is systematically generated for each file transmitted and made available in the “feedback” folder.

The schema concerning the data of the generated feedback is available in the [CSSF feedback file](#).

Please ensure that you have received a feedback file for the last file sent before submitting a new file concerning a same entity. Feedback generation could take some time. If you do not receive a response within one working day, please contact our dedicated support team at edesk@cssf.lu.

5.1.2.1. Naming convention

The feedbacks from the CSSF are received in the “feedback” folder of the S3 transfer client.

Format: **SourceFileName_FEEDBACK_TrackingCode.json**

Code	Meaning	Structure	Authorised value
------	---------	-----------	------------------

SourceFileName	Reporting entity	Char(N)	Submitted file name - Refer to the ZIP File name structure in section 5.1.1
–	Separator	Char(1)	`_` (constant)
FEEDBACK	File type	Char(8)	FEEDBACK (constant)
TrackingCode	Unique identifier	Char(19)	Unique identifier created by the CSSF system after file submission DOCOFFYYYYMMDDXXXXX where: YYYYMMDD: year, month and day of submission XXXXXX: daily increment
–	Separator	Char(1)	`_` (constant)
.json	Extension	Char(5)	.json (constant)

5.1.2.2. File content

A feedback file contains several information:

- A status at the report level;
- ReportUids previously processed;
- Feedback messages at the report level.

5.1.2.2.1. Report status

The report status can have two different values:

- REJECTED when the report is entirely rejected. That is the case when the archive is not technically compliant.
- ACCEPTED when the archive is technically compliant and all the relevant data to be included in the report have been correctly reported.

5.1.2.2.2. ReportUids previously processed

The feedback file lists the unique identifiers (reportUid) of the last reports concerning the fund in the CSSF processing order (most recent report at the top of the list).

5.1.2.2.3. Feedback message at report level

If a report has the ACCEPTED status, a feedback message with the "DOCOFF000" code is sent.

If a report has the REJECTED status, the possible errors at report level, are listed in the table below with the severity "ERROR".

Feedback messages

Error code	Error message
DOCOFF000	"The submission has been accepted by the CSSF"
DOCOFF001	"The archive is corrupted"
DOCOFF002	"The archive name is invalid. The expected naming convention must follow the regex: DOCOFF-(?<entityCssfCode>[OKV]\\d{8})-(?<reportUid>[0-9a-f]{8}-[0-9a-f]{4}-[0-9a-f]{4}-[0-9a-f]{4}-[0-9a-f]{12}).zip"
DOCOFF003	" The archive size cannot exceed 2 MB "
DOCOFF004	" The submitter is not authorized to transmit the archive for this entity "
DOCOFF005	"The entity defined in the naming convention is not in the scope "
DOCOFF006	""The archive with uuid "uuid" has already been received for this entity "
DOCOFF007	" The archive must contain a single PDF file"
DOCOFF008	" The CSSF code of the entity in the nomenclature of the PDF file is different from the CSSF code of the entity code used in the archive name "
DOCOFF009	"The filename is invalid. The expected naming convention must follow the regex: DOCREP-(?<entityCssfCode>[OKV]\\d{8})-(?<documentDate>[1-9][0-9][0-9]{2}-([0][1-9] [1][0-2])-([1-2][0-9] [0][1-9] [3][0-1]))-(AI MR)-(DE EN FR LU)-(?<reportUid>[0-9a-f]{8}-[0-9a-f]{4}-[0-9a-f]{4}-[0-9a-f]{4}-[0-9a-f]{12}).pdf "
DOCOFF010	"Number of file into the archive cannot exceed 1 file "
DOCOFF011	"The archive is corrupted"
DOCOFF012	"The document type is not the document type expected for the selected fund "

5.2. Reporting entities obligations

5.2.1. Data quality

Entities are strongly advised to review and validate the reporting files (ZIP and PDF files) before any submission.

5.2.2. Review the feedback files and correct the rejected reports

Entities must ensure that all feedback files are properly analysed and that any rejected data are corrected and resubmitted.

5.3. Testing with CSSF

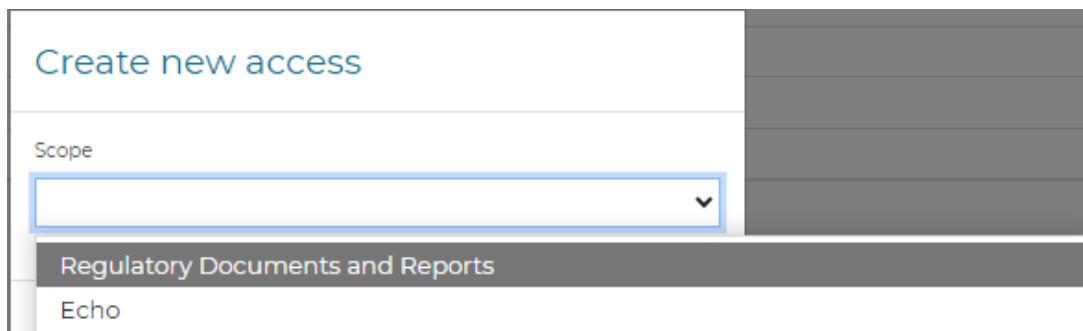
CSSF offers a connectivity check for entities to test their reporting file submissions through the S3 solution before moving to production

A connectivity check is highly recommended before the Go-Live.

Besides the main "Regulatory Documents and Reports" service, a dedicated "Echo Service" is at your disposal to ensure the good connectivity between your entity and our systems.

The authentication steps are similar to the regular report in regard to getting the credentials (cf Chapter 2.3.4 in [this file](#)) and uploading a file (cf Chapter 2.3.5 in [this file](#))

The "IT Expert" has to create a new access on the "Echo" bucket that is presented below in order to get the right S3 credentials.



You can upload a dummy file to the "submission" folder. If the connectivity check is completed, you will get a dummy feedback file as confirmation in the "feedback" folder.

Please note that this service remains always available.

In case you are unable to connect to the Echo Service or that you are not receiving any feedback, please contact edesk@cssf.lu.