

**ALERTS**

## **EU Marketing Update: Dutch Regulator Will Require Non-EU Managers To Submit Annex IV Reports From April 2023**

**January 5, 2023**

Non-EU fund managers that have notified their funds for marketing under the national private placement regime in the Netherlands have until now been exempt from Annex IV reporting obligations to the Autoriteit Financiële Markten (“AFM”). The AFM will now require Annex IV reporting via its online reporting portal. The first reports must be submitted by the end of April 2023.

Reporting must be submitted in XML format via the AFM Portal. Affected fund managers should consider creating a login account as soon as possible to ensure they receive all communications and updates from AFM in time and avoid delays in reporting. Information on how to create an AFM Portal account and general guidance on reporting can be found [here](#).

Non-EU fund managers reporting to AFM should also note that, from 2024, they will become subject to the “Data Quality Engagement Framework”. This will mean that the AFM and European Securities and Markets Authority (“ESMA”) will periodically review the data quality of submitted reports, and may request managers to correct and resubmit reports in cases of poor data quality.

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If you have any questions concerning this *Alert*, please contact your attorney at Schulte Roth & Zabel or one of the authors.

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