



Commission de Surveillance
du Secteur Financier

AIFM Reporting Dashboard

31 DECEMBER 2023

AIFM Reporting Dashboard

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AIFM Reporting Dashboard

1. Introduction

1.1 Scope of Report

- Current analysis of AIFMD data is dated 31/12/2023 and was built on the basis of end of year reports unless specified otherwise.
- Analysis focuses on LU AIFMs which manage a total net asset value of EUR 2.057bn. LU AIFMs can be either registered AIFMs¹ subject to a more limited scope of reporting or authorised AIFMs² subject to a wider reporting obligation under the AIFMD.
- AIFs managed by LU AIFMs are mostly based in Luxembourg (i.e. EUR 1.926bn / 94%), but can also be based in other EU and non-EU countries (EUR 131bn / 6%).

1.2 Exclusions

- LU AIFs managed by Non-LU AIFMs are excluded from this analysis since the AIFMD reporting is not collected by the CSSF, but by other EU NCAs supervising the AIFM.
- Data collected by the CSSF from Non-EU AIFMs under the National Private Placement Regime (“NPPR”)³ concerning LU or Non-LU AIFs (i.e. AIFs only marketed in Luxembourg) is specifically addressed in section 5 and hence this data is not considered in sections 3 to 4 of this analysis.

¹ Art. 3 of the law of 12 July 2013 on Alternative investment fund managers

² Art. 5 of the law of 12 July 2013 on Alternative investment fund managers

³ As per Article 42 of the AIFMD on conditions for the marketing in Member States without a passport of AIFs managed by a non-EU AIFM



2. Executive Summary

Key indicators	Funds of funds	Hedge funds	Private Equity	Real Estate	Other AIFs	Total*
Size						
Number of AIFs (Absolute number of units)	2 301	304	2 104	1 273	2 945	9 019
Net asset value (EUR bn)	€ 418bn	€ 33bn	€ 623bn	€ 289bn	€ 686bn	€ 2057bn
Average fund size (EUR mn per fund)	€ 182M	€ 108M	€ 296M	€ 227M	€ 233M	€ 228M
NAV annual growth (% of NAV)	21%	-38%	21%	0%	17%	14%
Proportion of total market (NAV % of all AIFs)	20%	2%	30%	14%	33%	100%
Distribution						
Retail participation (% of total)	5%	11%	5%	3%	5%	5%
Leverage						
Leverage (Gross method) (% of NAV)	110%	353%	104%	136%	128%	122%
(% YoY growth)	-2%	10%	1%	3%	-3%	-3%
Leverage (Commitment method) (% of NAV)	102%	270%	102%	131%	111%	112%
(% YoY growth)	1%	13%	1%	2%	-3%	-2%
Financial Leverage (% NAV)	3%	62%	3%	15%	3%	6%
Liquidity						
Open ended AIFs (% NAV)	44%	78%	4%	41%	43%	32%
Liquidity surplus (Surplus/NAV)	0%	20%	1%	3%	8%	4%
(% YoY Delta)	-0,2%	0,1%	0,0%	0,9%	0,8%	0,1%
Liquidity shortage (Shortage/NAV)	-7%	-3%	0%	-4%	-3%	-3%
(% YoY Delta)	1,2%	-1,1%	0,2%	0,9%	0,7%	0,6%

*Funds with predominant strategy "NONE" are considered in the statistics provided in the Column "Total", but are not disclosed separately.

Market Overview

- 9.019 AIFs managed by LU AIFM accounting for a Total NAV of EUR 2.057bn (excluding AIFs under the National Private Placement Regime (NPPR)).
- Concentrated LU AIFM sector (47% of NAV is concentrated with 4% of the largest AIFs).
- AIFs are on average smaller than UCITS. 63% of AIFs managed by LU AIFMs with NAV<EUR 100M.
- Growth of the LU AIFM sector in 2023 despite the current economic climate: AIFs are up by 14% in terms of total NAV. Progression recorded mainly by PEQF (+21%), FOFS (+21%) and OTHR (+17%), while the drop in HFND NAV (-38%) is mostly driven by a fund reclassification.
- PEQF continue to be the dominant strategy on the LU AIF market (30%) and reached a new high in terms of total NAV (EUR 623bn). FOFS, traditional AIFs (Equity and Fixed Income AIFs) and REST are the next main strategies in terms of market shares. HFND remain small in Luxembourg.

AIFs investors

- 95% of AIF investors are professional investors.
- Other UCI, pension funds and other financial institutions as main AIF investors.
- Top 5 investors account for 87% of NAV on average. Nonetheless, this high percentage could possibly reflect a lack of look-through on the beneficial owner in the reports provided by AIFMs.

Leverage

- As observed in the previous years, overall leverage remains limited, except for HFND.
- Leverage figures (AUM/NAV, commitment and gross methods) are quite stable for all strategies, including for HFND where the deleveraging observed since Q4 2020 has ended in 2023.
- Financial leverage has increased since 2021 (from EUR 48bn to EUR 117bn), but remains low in % of NAV, except for HFND (~62% of NAV). Most of financial leverage is coming from secured borrowing and (reverse) repo transactions (for HFND).
- However, additional financial leverage may be contracted at sub-asset level (i.e. embedded leverage in intermediary vehicles (SPVs) and may be excluded from leverage figures under certain conditions).
- In this context, following the clarification of the ESMA Q&A on AIFMD (section VII, question 8) for the inclusion of the leverage contracted at the SPV level on a look-through basis in relation to AIFs whose core investment policy is to invest directly or indirectly in real estate, the commitment leverage figures are now more consistently reported. However, no material change has been noted so far on the aggregate leverage levels of REST.

Portfolio breakdown

- Overall, long exposures reported are in line with AIFs investment strategies.
- Limited use of derivatives for all investment categories, except for HFND.
- 2023 TOP 5 exposures: shares of UCIs (EUR 780bn compared to EUR 581bn last year) are the largest exposures. Other exposures are in line with the previous year - unlisted equities (EUR 539bn), FX derivatives (for hedging purposes) (EUR 236bn) and commercial real estate (EUR 123bn), or slightly rising - non-leveraged loans (EUR 235bn compared to EUR 191bn last year).
- Europe and to a lesser extent North America as dominant investment regions.

Liquidity

- More and more LU AIFs are closed-ended funds (only 32% are open-ended AIFs in terms of NAV). This trend observed since 2019 is attributable to the rise of the PEQF AIFs which are almost systematically closed-ended funds as well as to data quality improvements. 63% of open-ended funds' NAV is redeemable daily to monthly; lower redemption frequencies for PEQF and REST funds.
- The LU AIF market liquidity has increased in comparison with last year, the aggregated liquidity shortage is the lowest since 2019 at -2,9% of NAV.
- PEQF, HFND, REST and OTHR AIFs continue to show liquidity surpluses on average for most time buckets.
- FOFs AIFs show a higher overall liquidity surplus in comparison with the previous years, but a noticeable deficit for the 31-90 days bucket (-13%) remains.
- Such enhancement of the liquidity profile, especially for REST AIFs and FOFs AIFs, is partially explained by a global improvement of the way to report AIF investor liquidity (LMTs reflected in the figures reported) and as a result of the continuous data quality controls/actions performed by CSSF.



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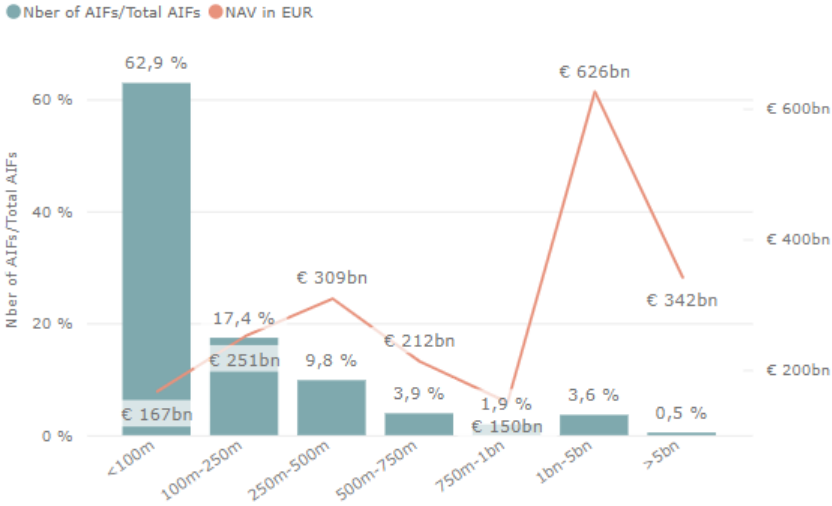
Non-EU AIFMs in Luxembourg (NPPR)

- 1.390 AIFs, with a total NAV of EUR 1.276bn, are marketed in Luxembourg by Non-EU AIFMs under the NPPR.
- Non-EU AIFs marketed in Luxembourg are mostly from USA (42%). In terms of strategy, 37% are PEQF, 24% are OTHR and 20% are HFND.
- The drop in NAV in 2020 was due to the exit of a large entity from the scope of the NPPR.

3. Global overview of AIFs managed by LU AIFMs

3.1 Main characteristics

3.1.1 Market size overview



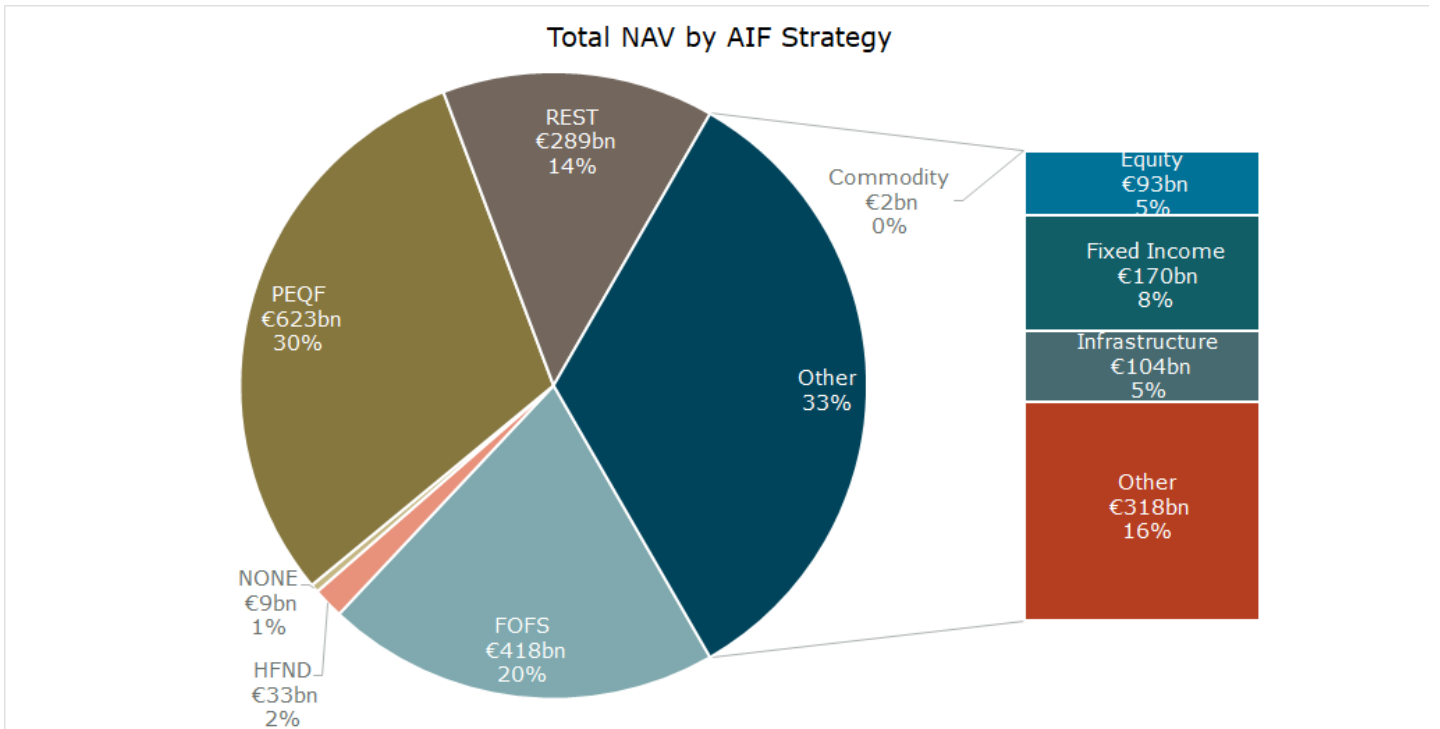
Statistical Indicators:

AIFs total number	9019*
Total NAV	EUR 2.057bn
Mean	EUR 228M
First quartile	EUR 15M
Median	EUR 53M
Third quartile	EUR 184M

* AIFs with « no reporting flag » activated are excluded from this data sample

Source: AIFMD data as at 31.12.23 from all LU AIFMs

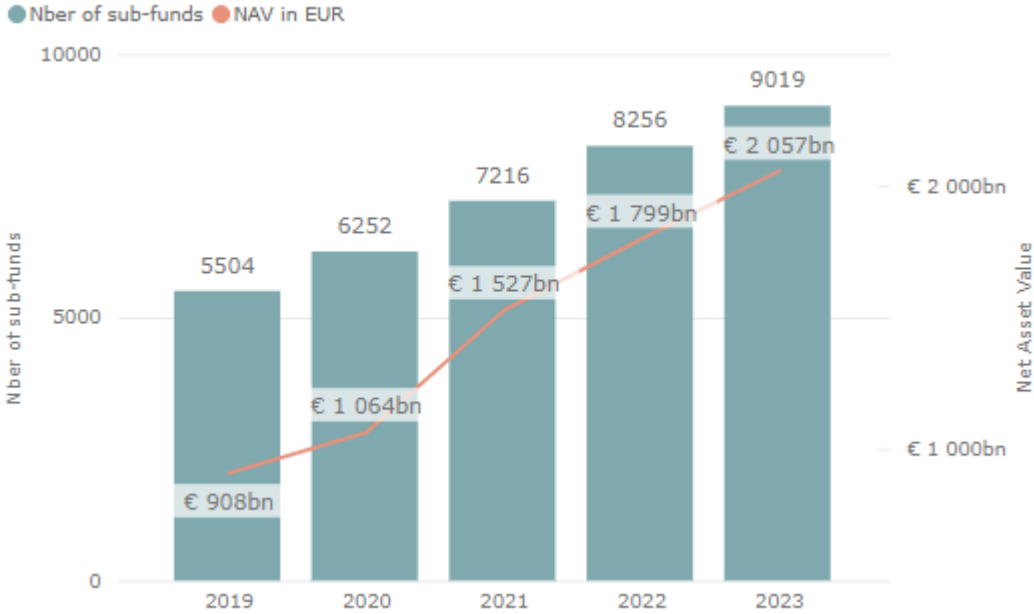
3.1.2 AIFs Investment Strategies



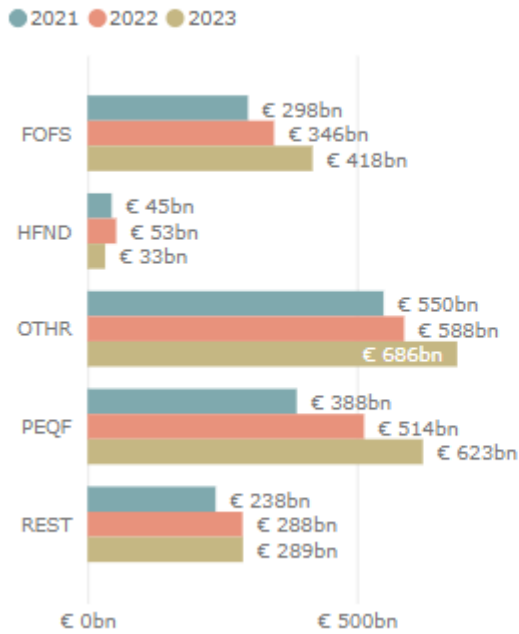
Source: AIFMD data as at 31.12.23 from all LU AIFMs

3.1.3 AIFs Market trends

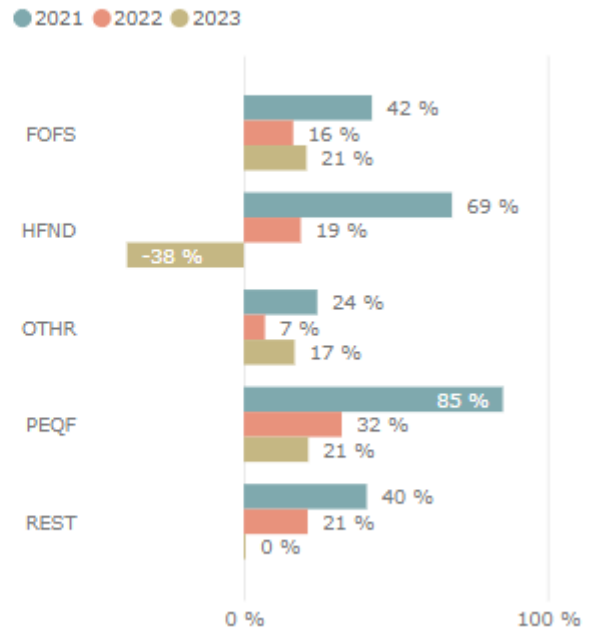
Evolution of LU AIFs Market



Evolution of total NAV per AIF strategy



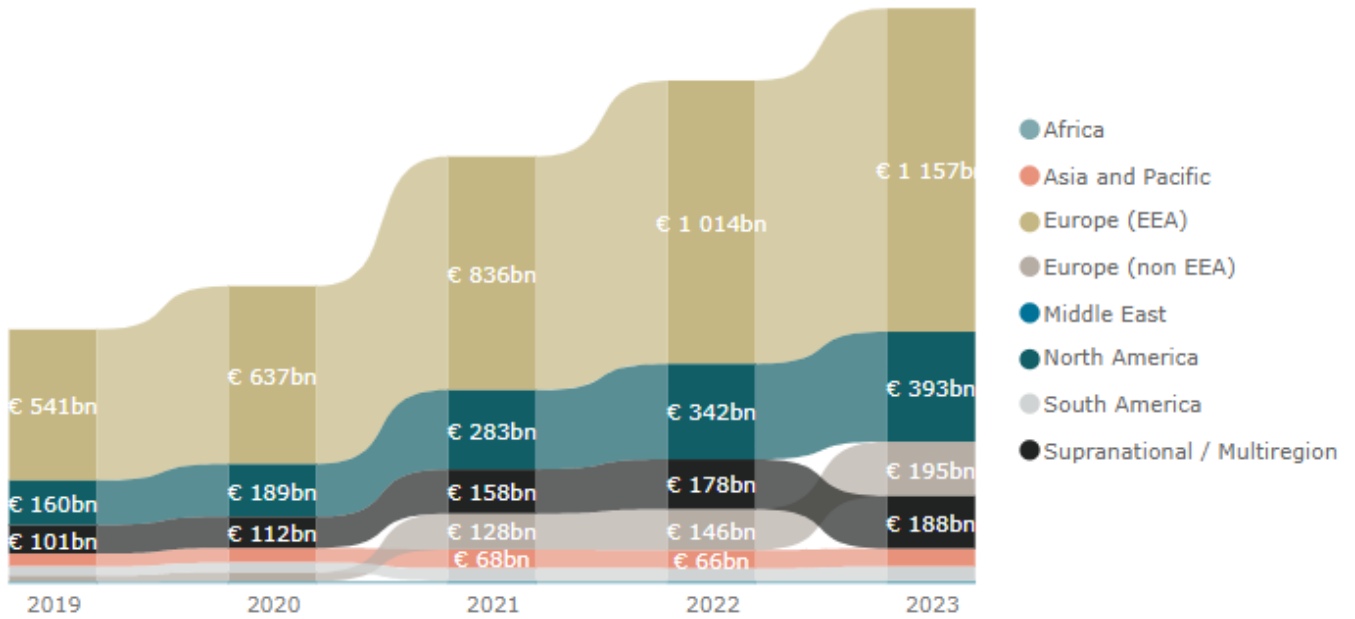
Annual variation of NAV per AIF strategy



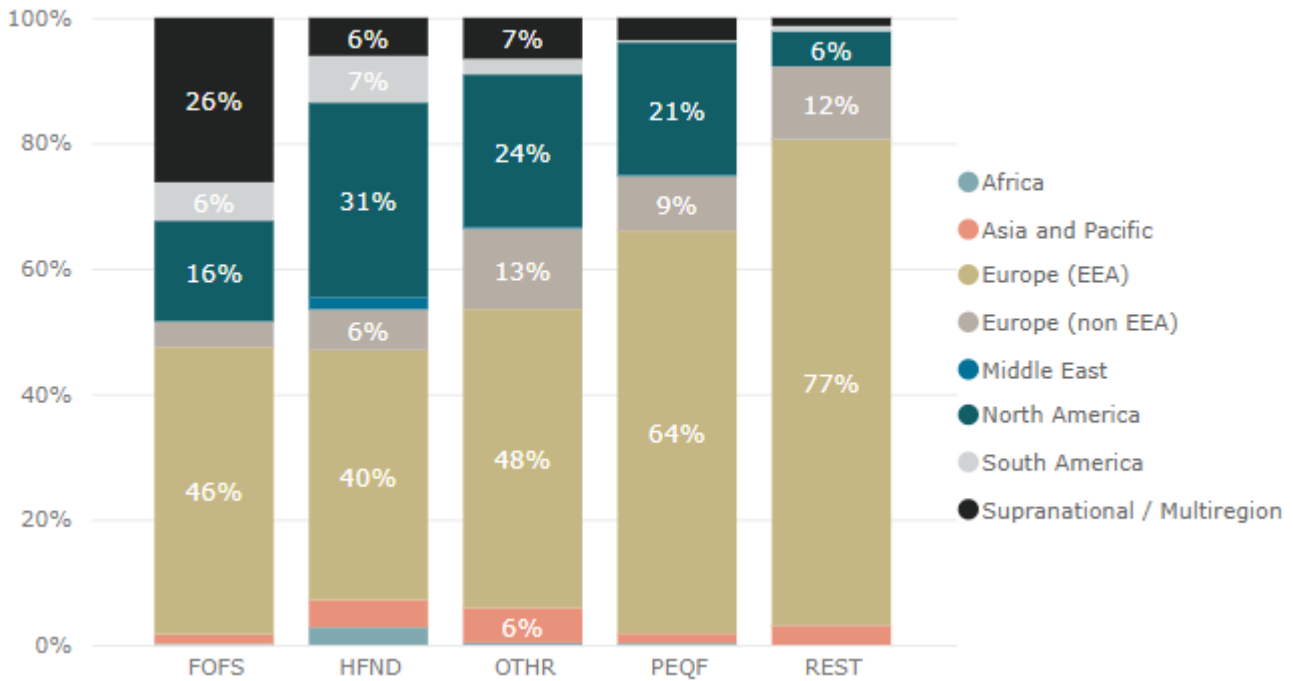
Source: AIFMD end of year data from all LU AIFMs

3.1.4 AIFs investments location

Trends in AIFs geographical NAV exposure



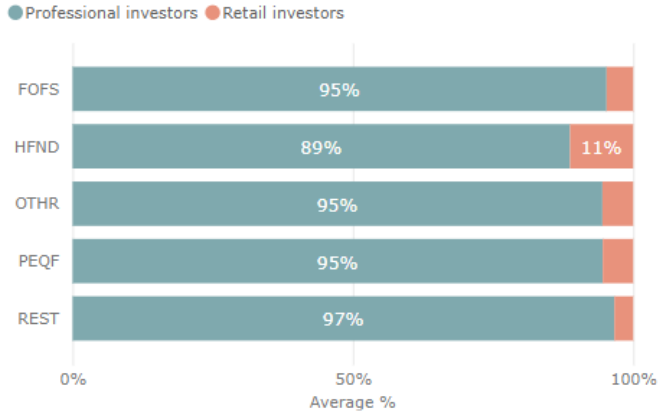
Geographical footprint of AIF investments



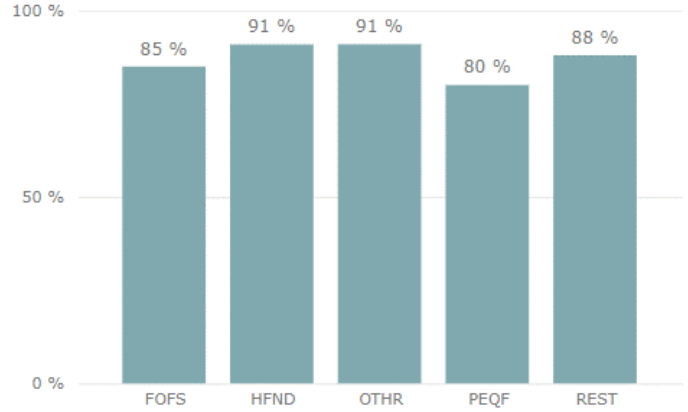
Source: AIFMD data as at 31.12.23 from all LU AIFMs

3.1.5 Investor profile of AIFs

Investor profile per AIF type (% NAV)

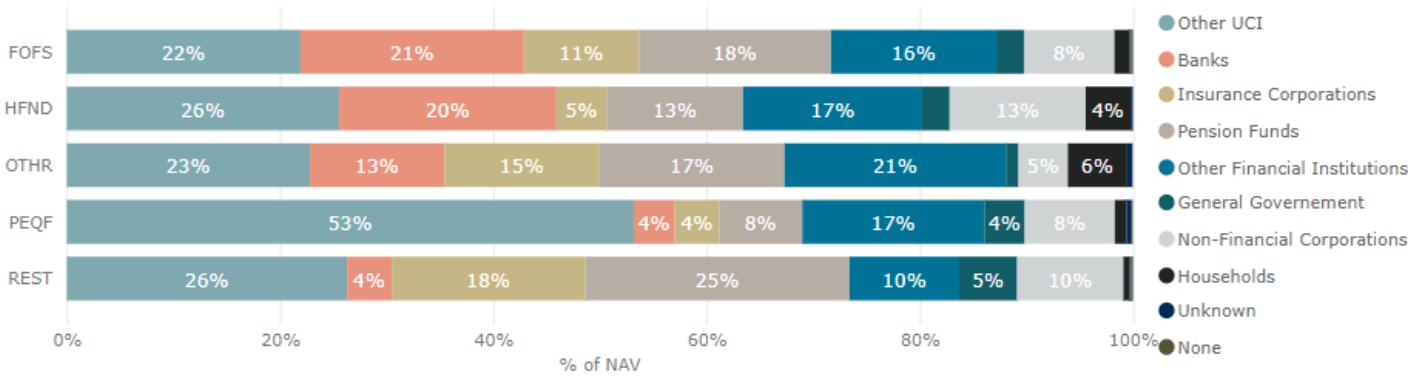


Top 5 investors percentage of ownership (% NAV)



Source: AIFMD data as at 31.12.23 from all LU AIFMs

Investor Group per AIF types



Source: AIFMD data as at 31.12.23 from all LU AUT AIFMs

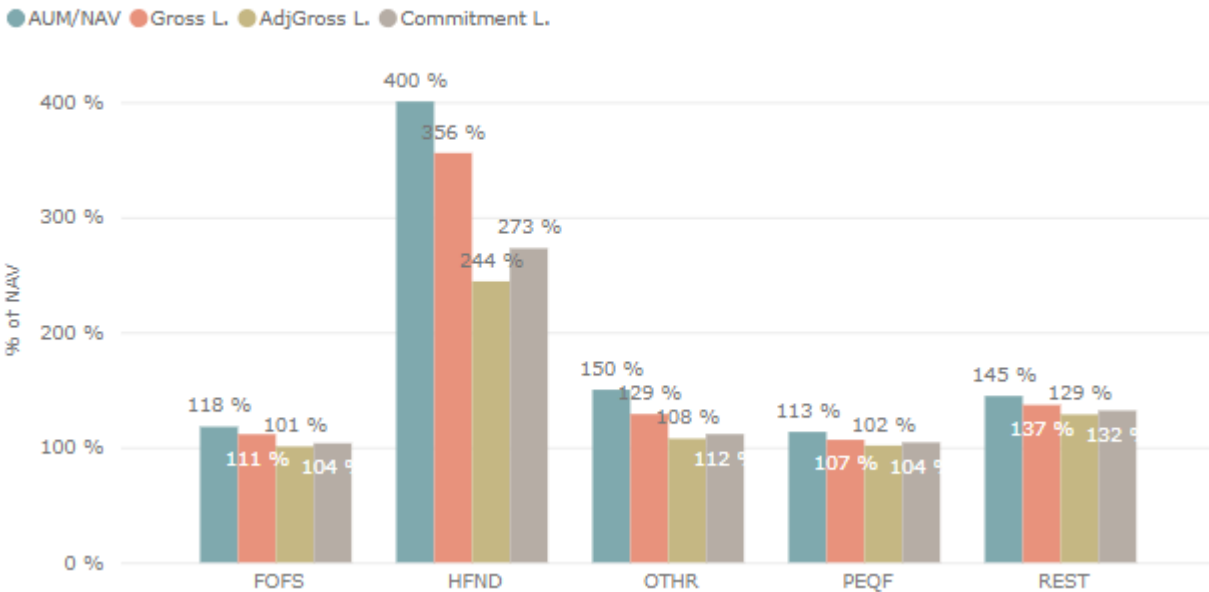
3.2 Risk profile of AIFs managed by LU AUT AIFMs

3.2.1 Leverage by AIF type (Gross Lev., Adj. Gross Lev., Commitment Lev., AUM/NAV methods)

Methodology note :

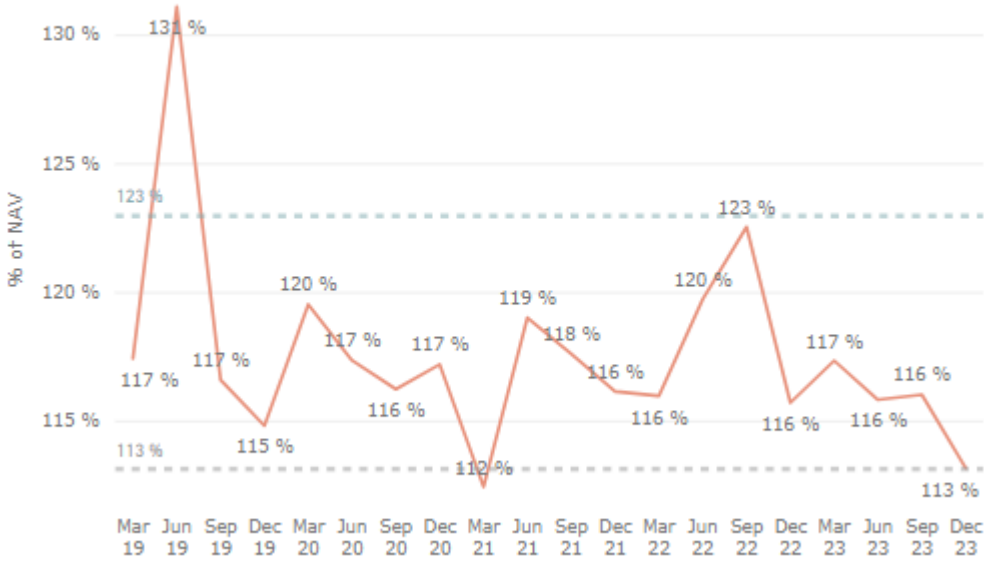
- **AUM/NAV:** this ratio provides an overall and simplified estimate of the market footprint of an AIF.
- **Gross Leverage:** ratio of the gross exposure quoted as a percentage of NAV. Under the gross method, exposures are calculated as the absolute value of all positions in the portfolio by including all assets and liabilities, relevant borrowings, derivatives (converted into their equivalent underlying positions) and all other positions, even those held purely for risk reduction purposes. Cash held in the base currency of the AIF is excluded.
- **Gross Leverage adjusted:** same methodology applied than for the Gross Leverage, but with the exclusion of interest rate and foreign exchange derivatives for hedging purposes. The background of this adjustment is that those instruments tend to inflate leverage measures, since they are measured using notional amounts.
- **Commitment Leverage:** ratio of AIF exposures to NAV, where exposures are computed using the commitment approach, which takes into account netting and hedging effects. Unlike gross leverage, cash is included here.

Leverage per AIF type



Source: AIFMD data as at 31.12.23 from all LU AUT AIFMs

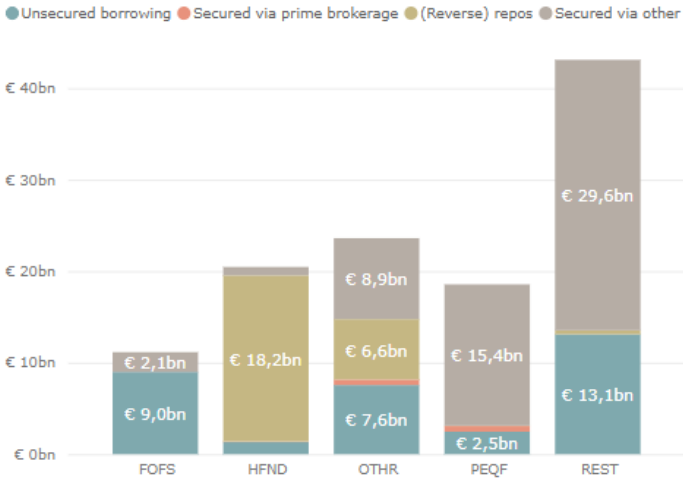
Commitment Leverage over time



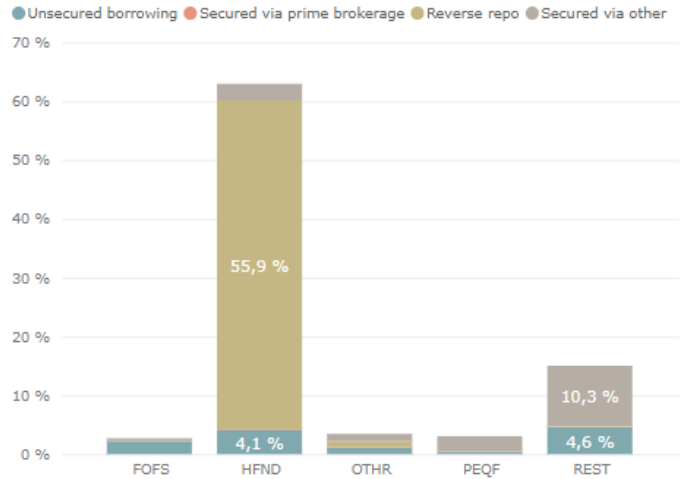
Note: Dashed lines relate to 5% and 95% percentiles
Source: AIFMD data from all LU AUT AIFMs

3.2.2 Financial leverage

Breakdown of financial leverage (EUR)



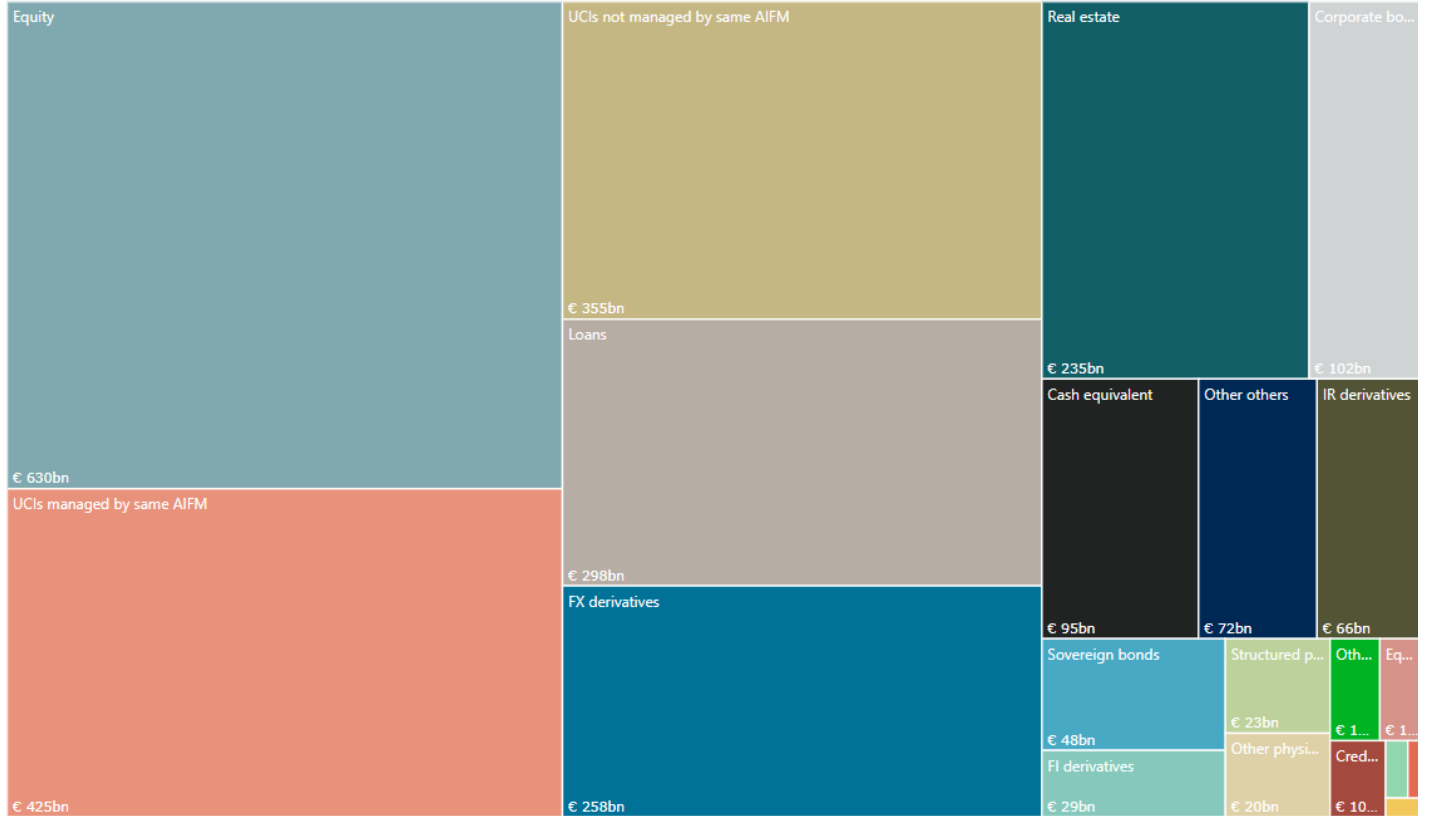
Breakdown of financial leverage (% NAV)



Source: AIFMD data as at 31.12.23 from all LU AUT AIFMs

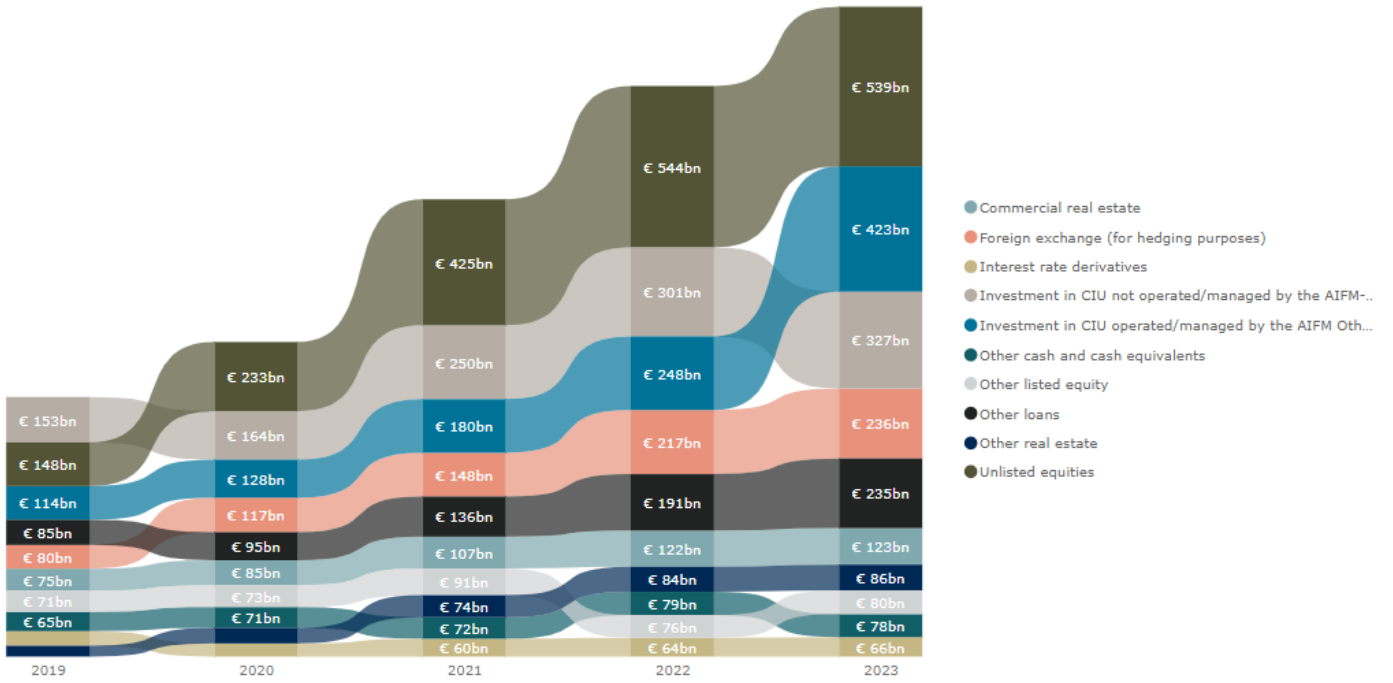
3.2.3 Portfolio breakdown – Aggregated long and short exposures

Individual Exposures (long and short)



Source: AIFMD data as at 31.12.23 from all LU AUT AIFMs

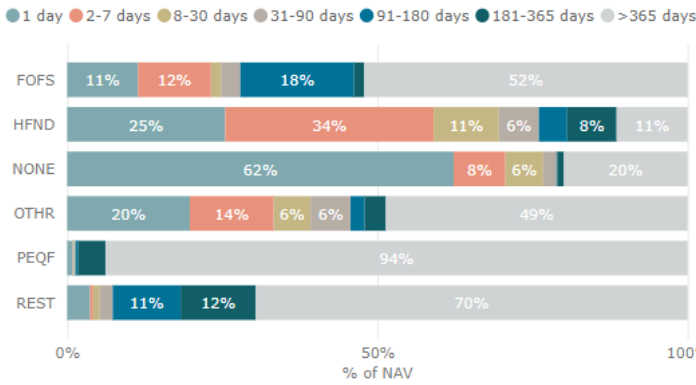
Evolution of top ten exposures (long and short)



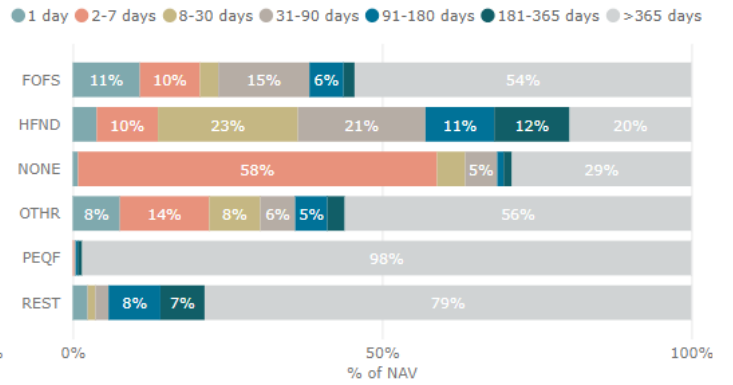
Source: AIFMD end of year data from all LU AUT AIFMs

3.2.4 AIFs Liquidity profile

Portfolio liquidity per time buckets



Investor Liquidity per time buckets

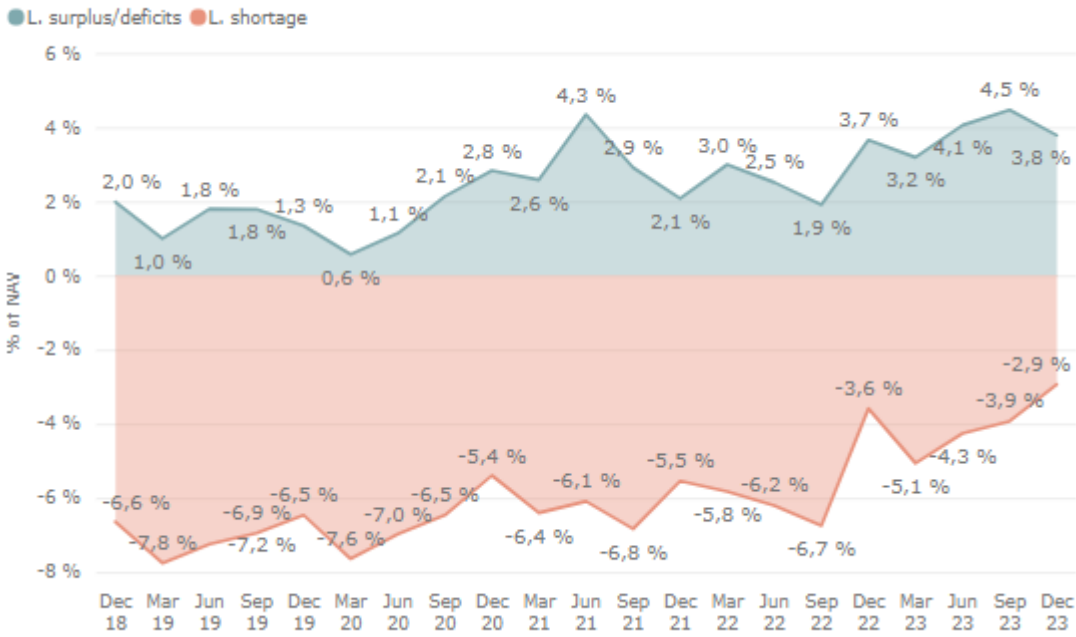


Source: AIFMD data as at 31.12.23 from all LU AUT AIFMs

Methodology note :

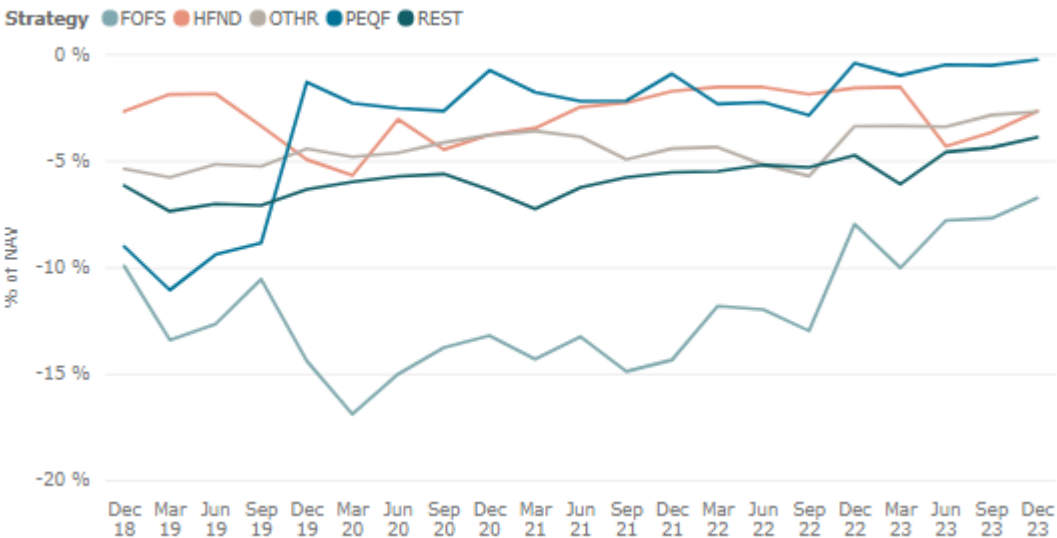
- **Liquidity surplus/deficit** is calculated as the difference between the portfolio liquidity and the investor liquidity both reported in % of the NAV which is then cumulated over liquidity buckets.
- **Liquidity shortage** is defined as the sum of the negative liquidity surpluses (i.e. deficits) at the level of each fund, without considering any (positive) liquidity surplus.

Liquidity shortage and liquidity surplus/deficits over time



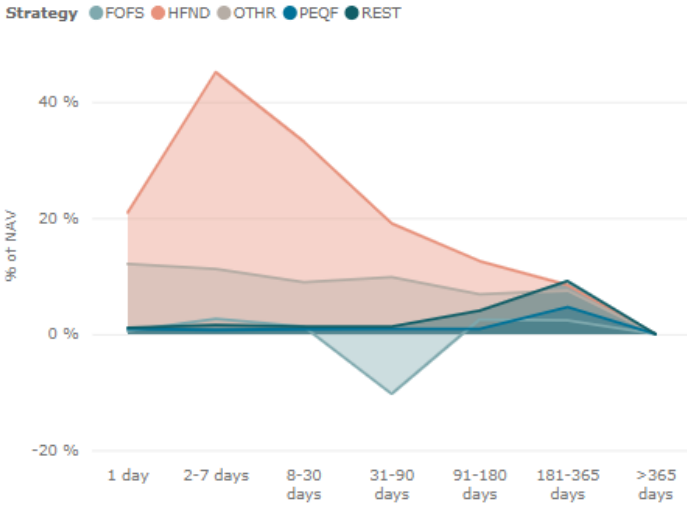
Source: AIFMD data from all LU AUT AIFMs

Liquidity shortage over time by AIF Strategy

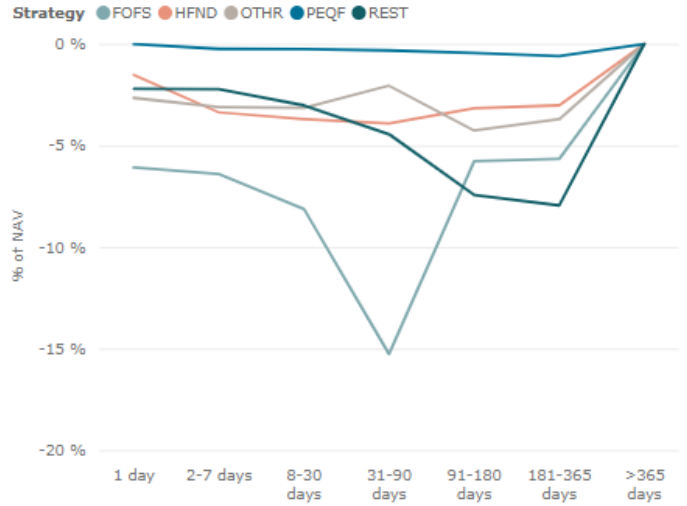


Source: AIFMD data from all LU AUT AIFMs

Liquidity surplus/deficits by AIF strategy



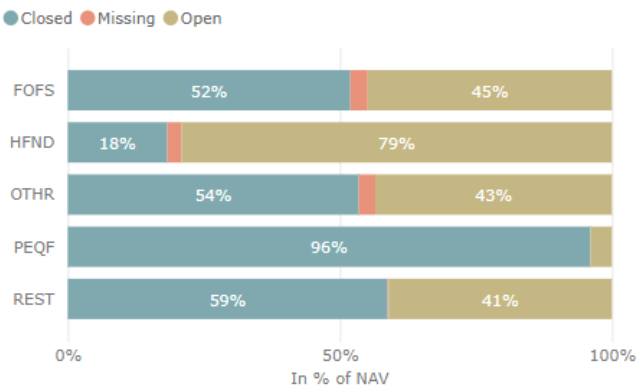
Liquidity shortage by AIF strategy



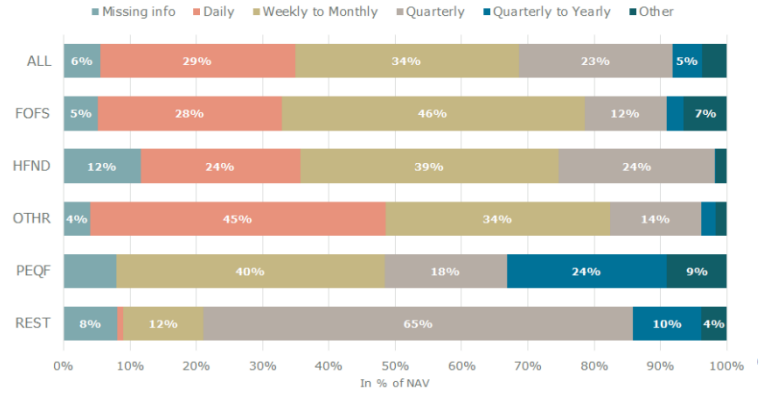
Source: AIFMD data as at 31.12.23 from all LU AUT AIFMs

3.2.5 AIFs redemption profile

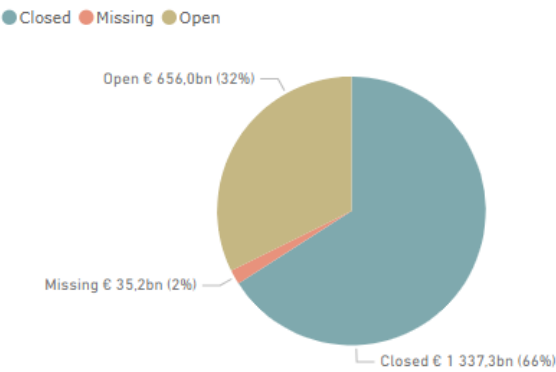
Redemption rights to investors



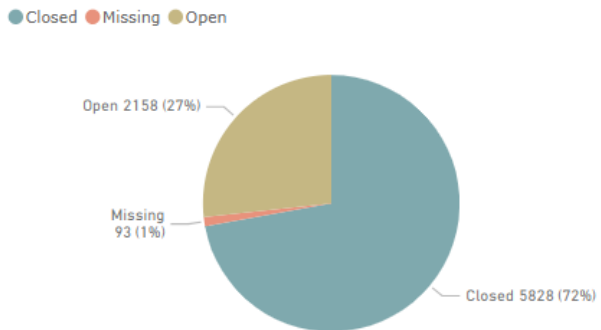
Redemption frequency of open-ended AIFs



Breakdown of NAV per open/closed-ended status



Number of open/closed-ended AIFs



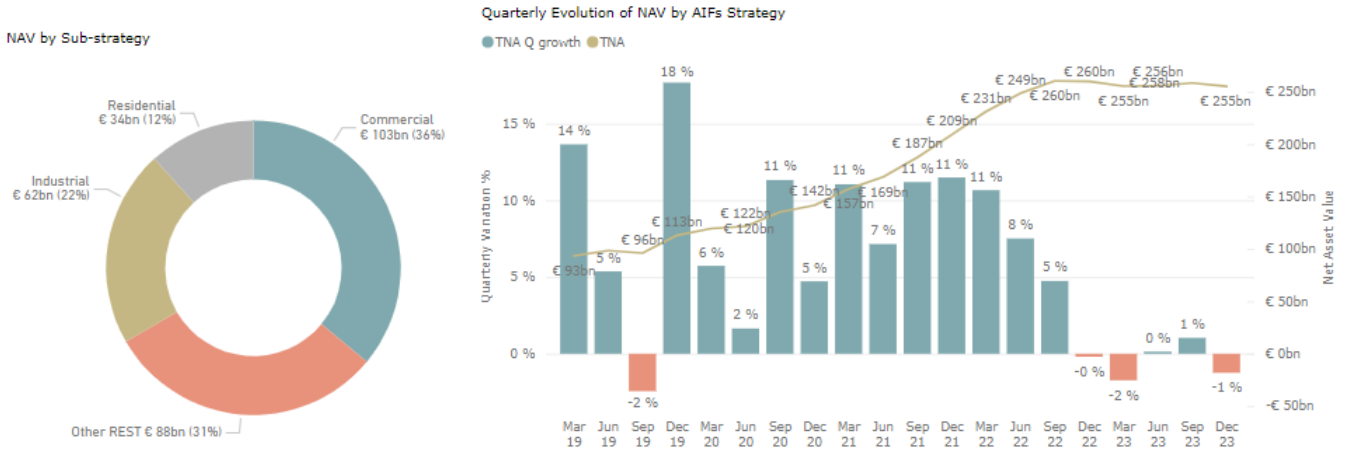
Source: AIFMD data as at 31.12.23 from all LU AUT AIFMs



4. Risk monitoring by main investment strategies

4.1 Real Estate funds

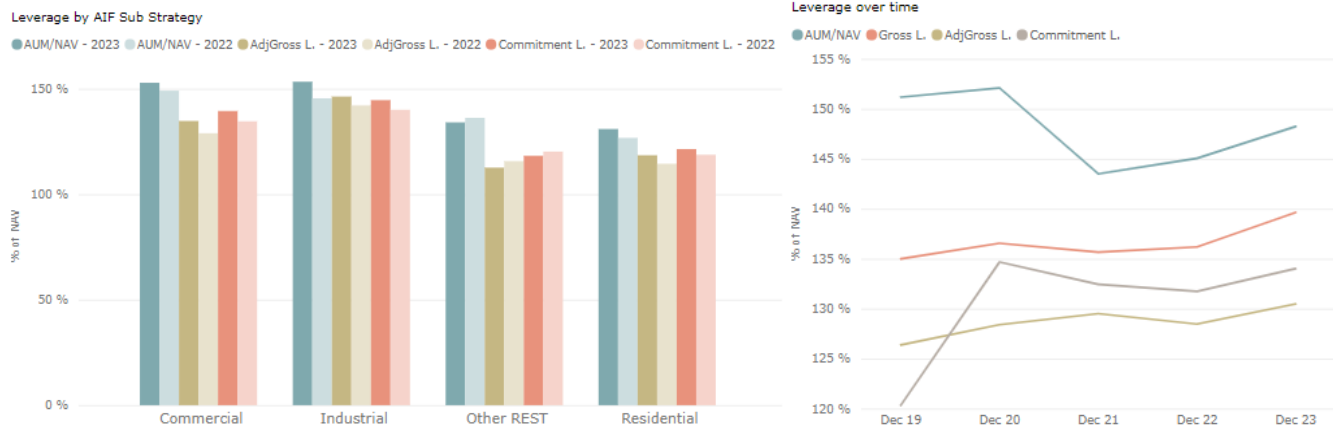
4.1.1 NAV by Sub Strategy and over time



Note: the chart on the right-hand side only considers the subset of AIFs that reports on a quarterly basis to provide meaningful trends over the quarters. Thus, the total NAV evidenced in the present chart will underestimate the real total NAV by strategy.

Source: AIFMD data as at 31.12.23 from all LU AUT AIFMs

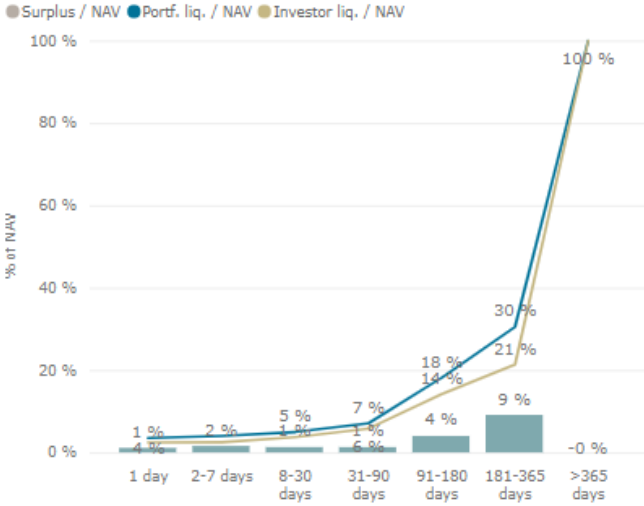
4.1.2 Leverage by predominant Sub Strategy and over time



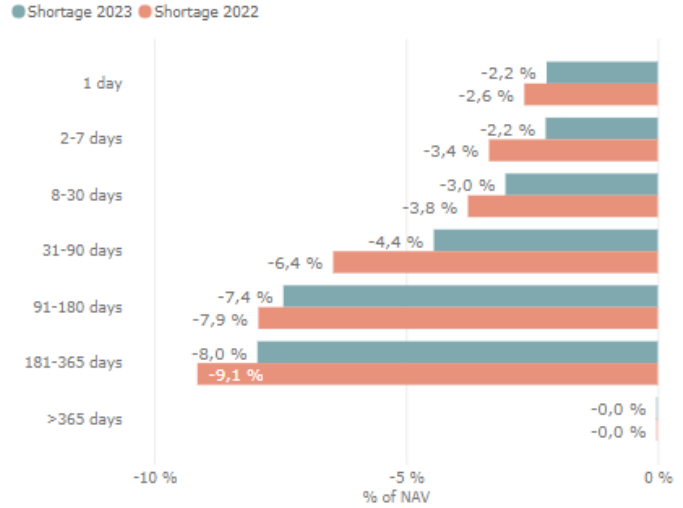
Source: AIFMD end of year data from all LU AUT AIFMs

4.1.3 Liquidity profile

Liquidity surplus by AIF strategy



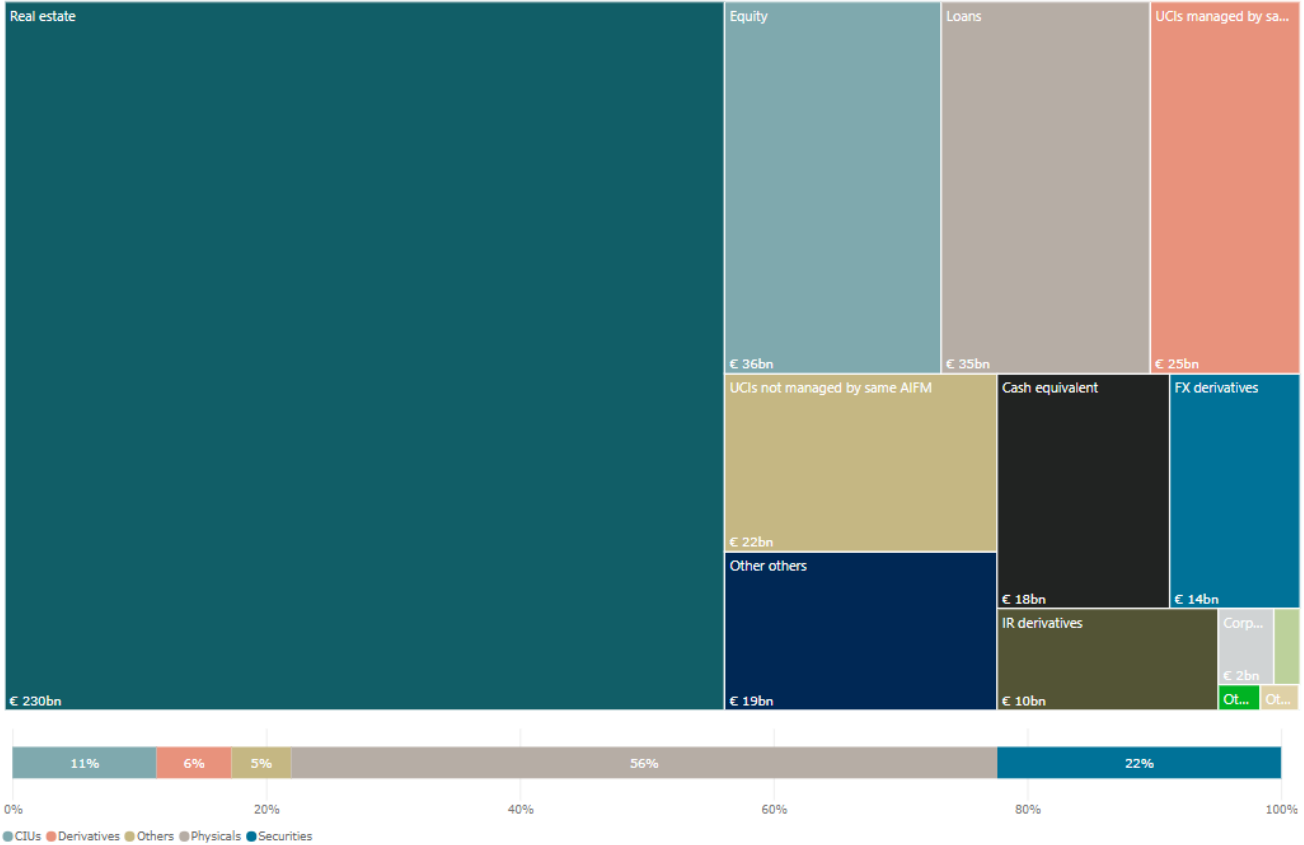
Liquidity shortage by AIF strategy



Source: AIFMD data as at 31.12.23 from all LU AUT AIFMs

4.1.4 Main Sub Asset exposures (in EUR)

Individual Exposures (long and short)

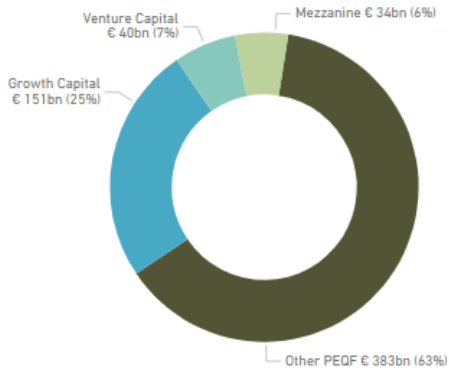


Source: AIFMD data as at 31.12.23 from all LU AUT AIFMs

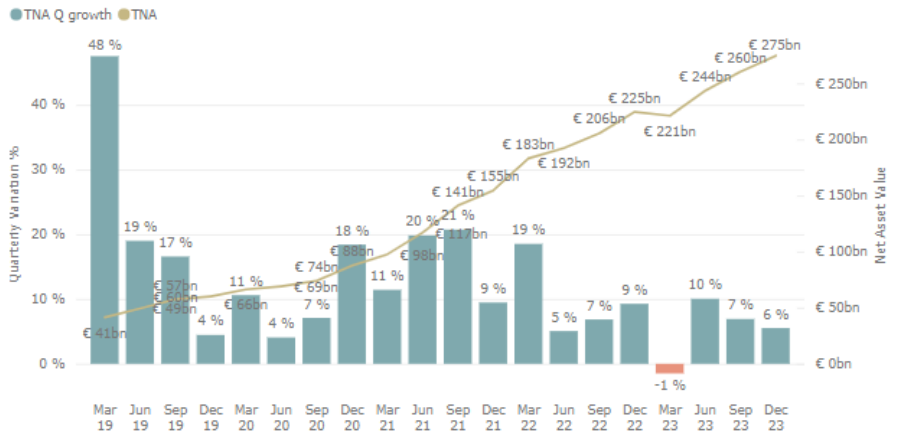
4.2 Private Equity funds

4.2.1 NAV by predominant Sub Strategy and over time

NAV by Sub-strategy



Quarterly Evolution of NAV by AIFs Strategy

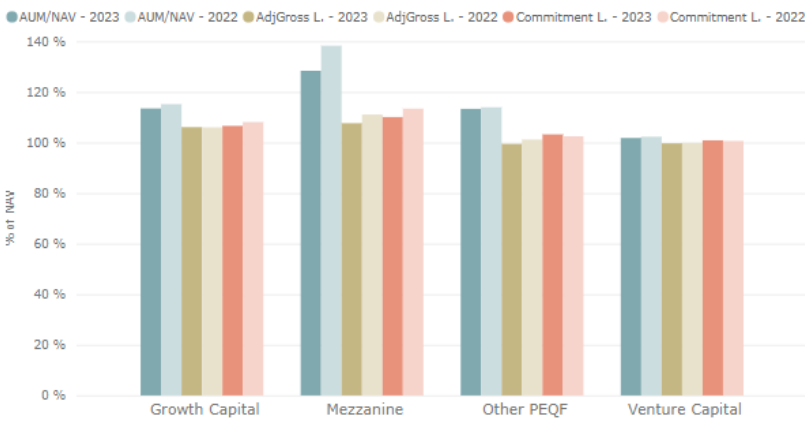


Note: the chart on the right-hand side only considers the subset of AIFs that reports on a quarterly basis to provide meaningful trends over the quarters. Thus, the total NAV evidenced in the present chart will underestimate the real total NAV by strategy.

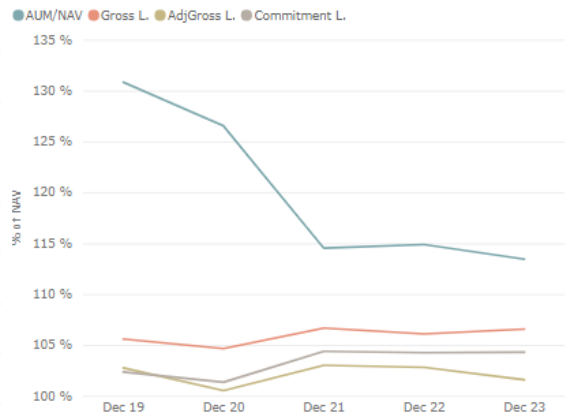
Source: AIFMD data as at 31.12.23 from all LU AUT AIFMs

4.2.2 Leverage by predominant Sub Strategy and over time

Leverage by AIF Sub Strategy

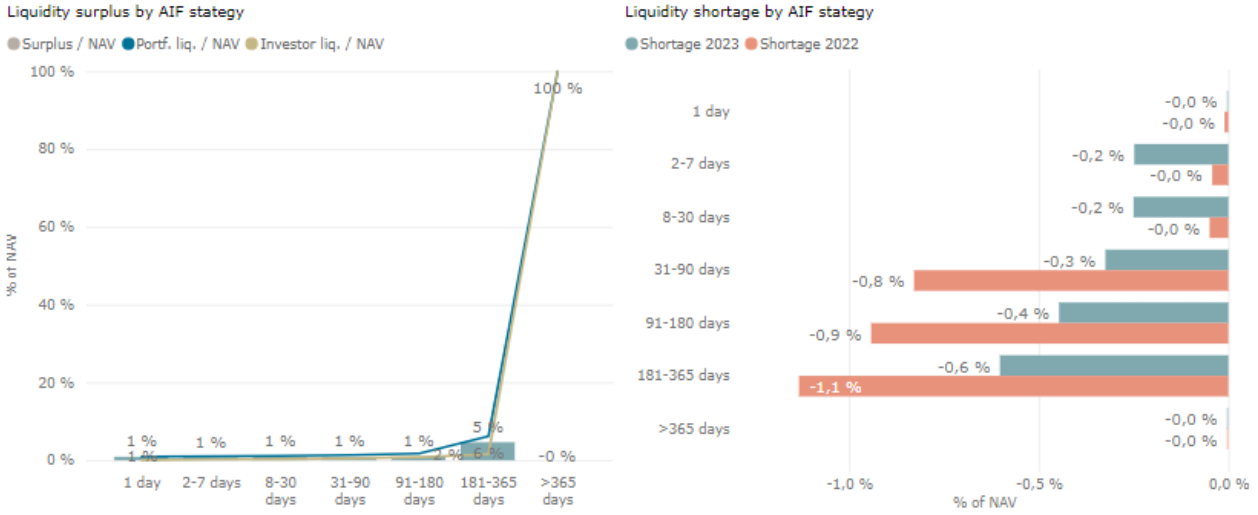


Leverage over time



Source: AIFMD end of year data from all LU AUT AIFMs

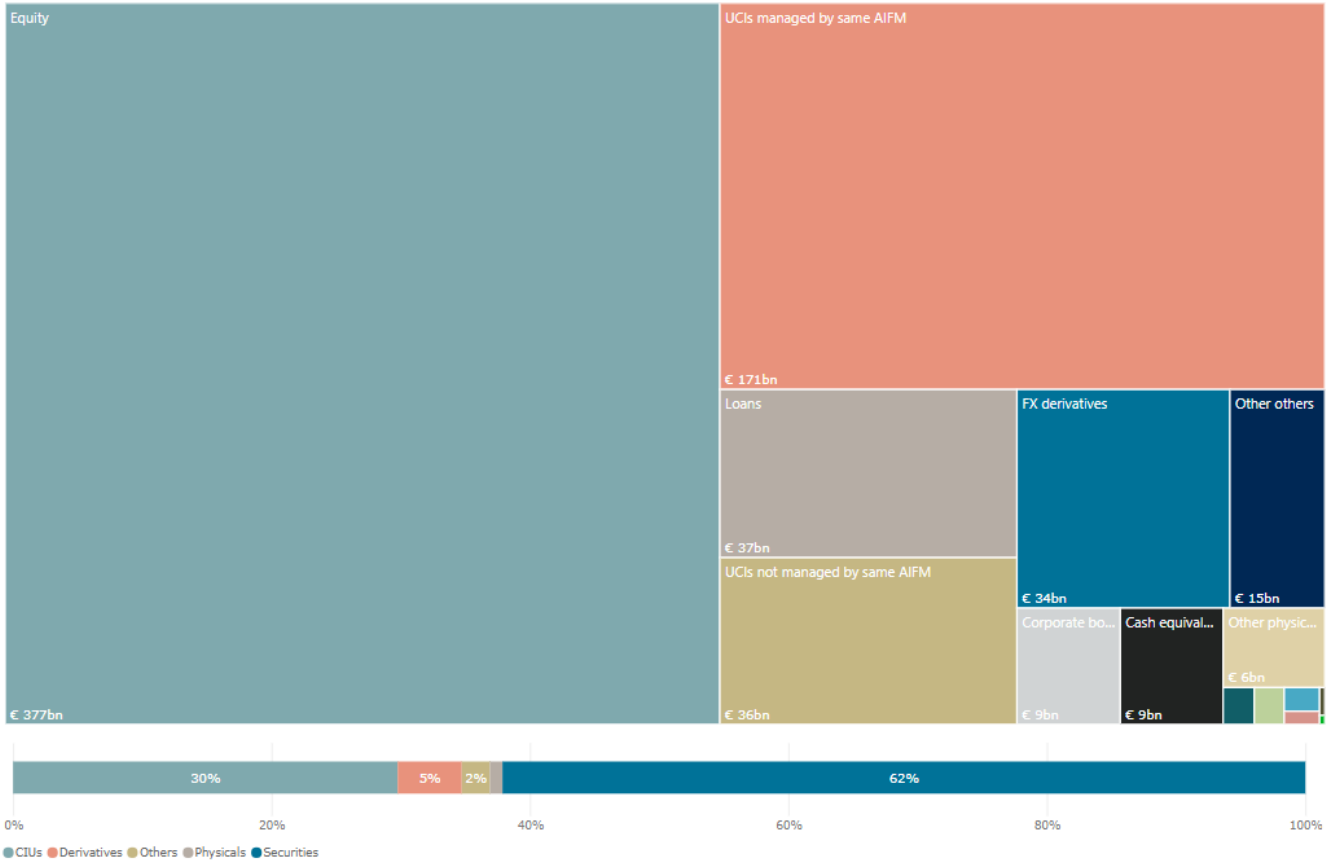
4.2.3 Liquidity profile



Source: AIFMD data as at 31.12.23 from all LU AUT AIFMs

4.2.4 Main Sub Asset exposures (in EUR)

Individual Exposures (long and short)



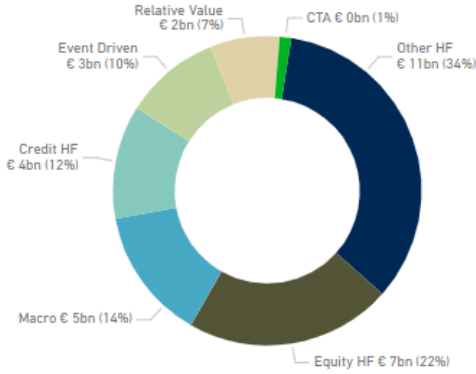
Source: AIFMD data as at 31.12.23 from all LU AUT AIFMs



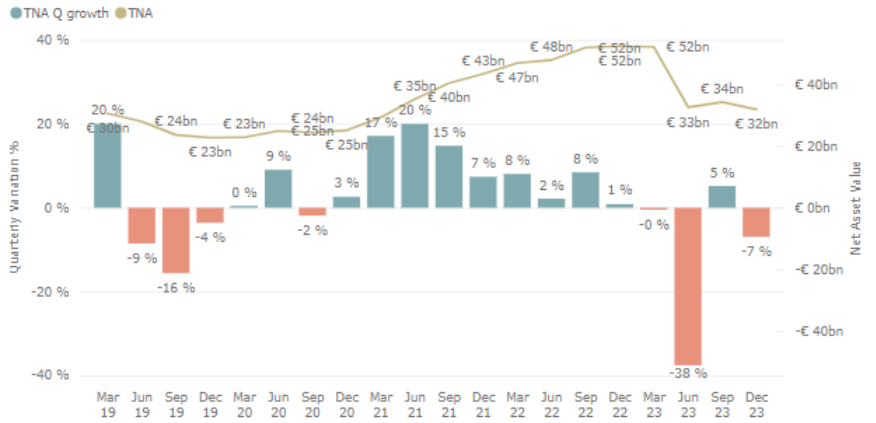
4.3 Hedge funds

4.3.1 NAV by predominant Sub Strategy and over time

NAV by Sub-strategy



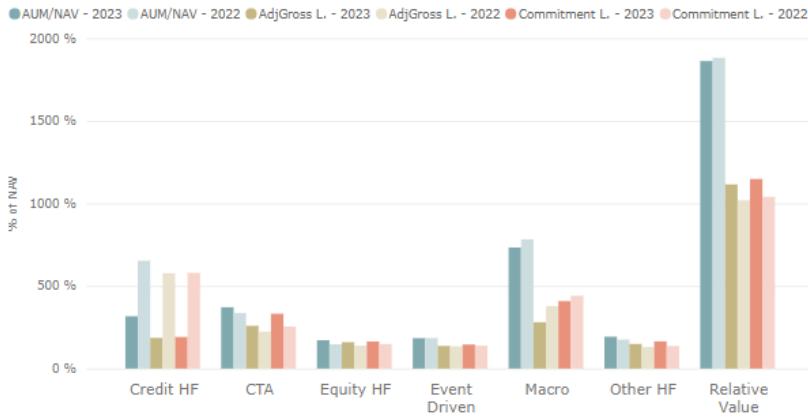
Quarterly Evolution of NAV by AIFs Strategy



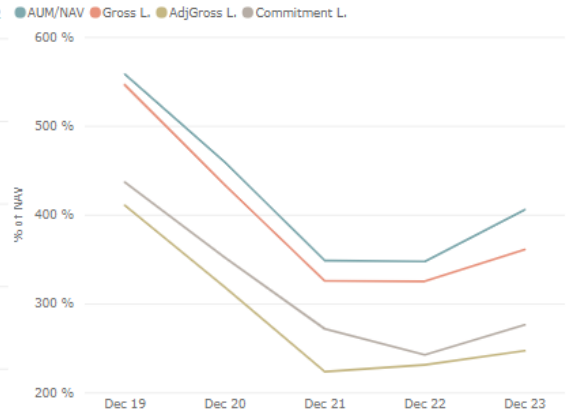
Note: the chart on the right-hand side only considers the subset of AIFs that reports on a quarterly basis to provide meaningful trends over the quarters. Thus, the total NAV evidenced in the present chart will underestimate the real total NAV by strategy.
Source: AIFMD data as at 31.12.23 from all LU AUT AIFMs

4.3.2 Leverage by predominant Sub Strategy and over time

Leverage by AIF Sub Strategy



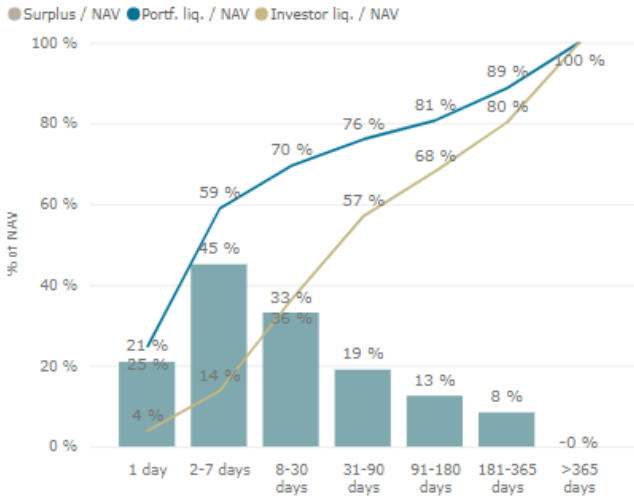
Leverage over time



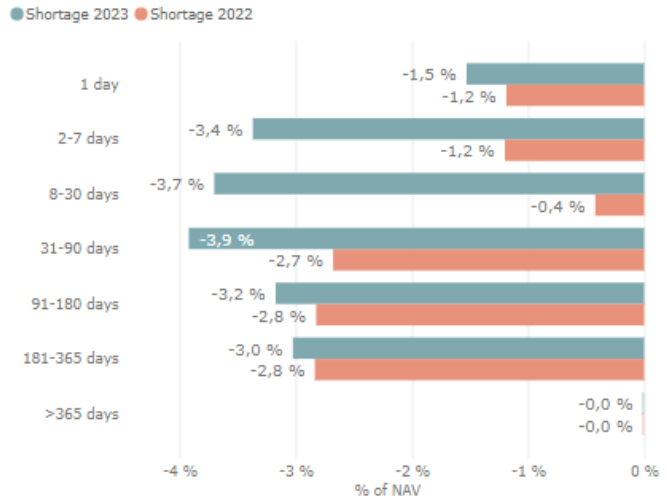
Source: AIFMD end of year data from all LU AUT AIFMs

4.3.3 Liquidity profile

Liquidity surplus by AIF strategy



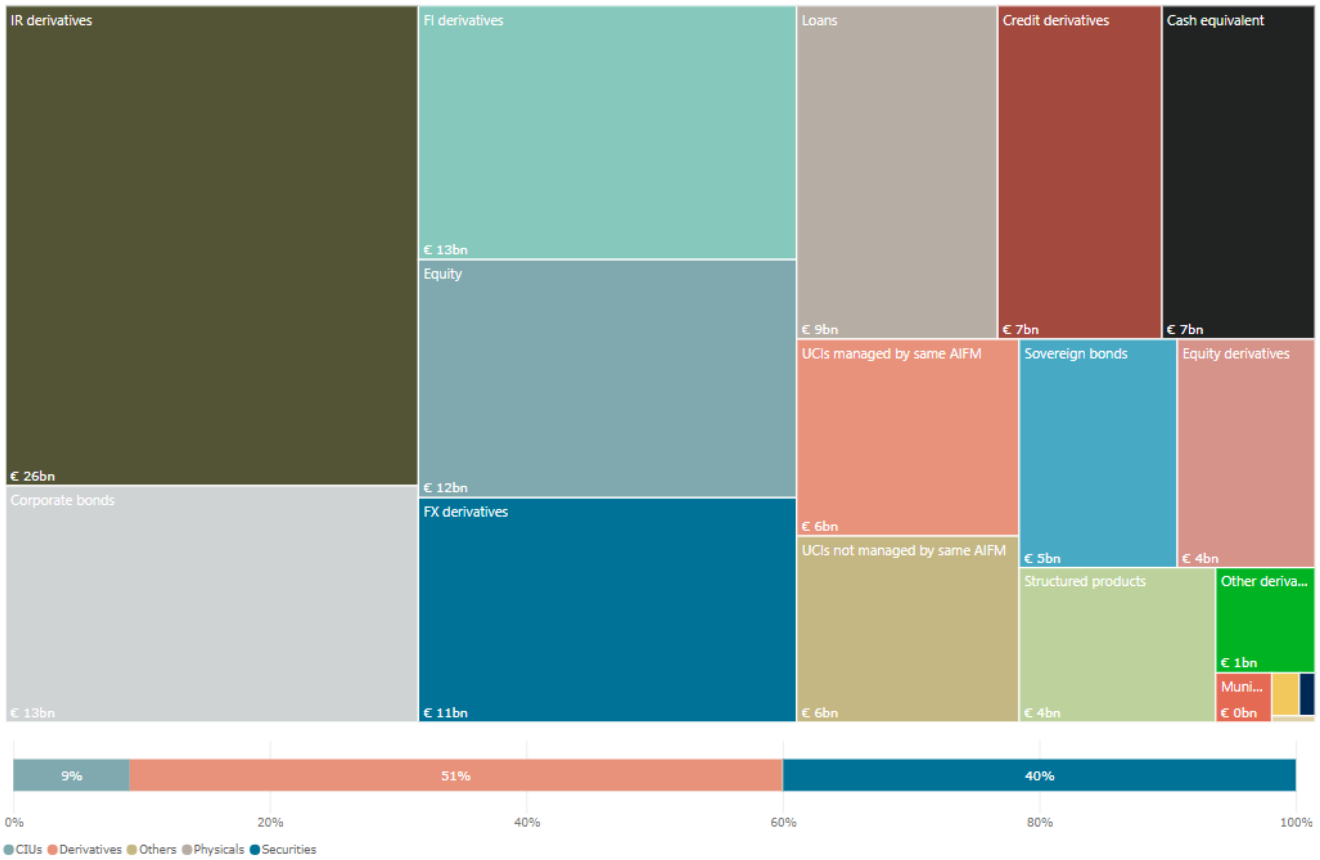
Liquidity shortage by AIF strategy



Source: AIFMD data as at 31.12.23 from all LU AUT AIFMs

4.3.4 Main Sub Asset exposures (in EUR)

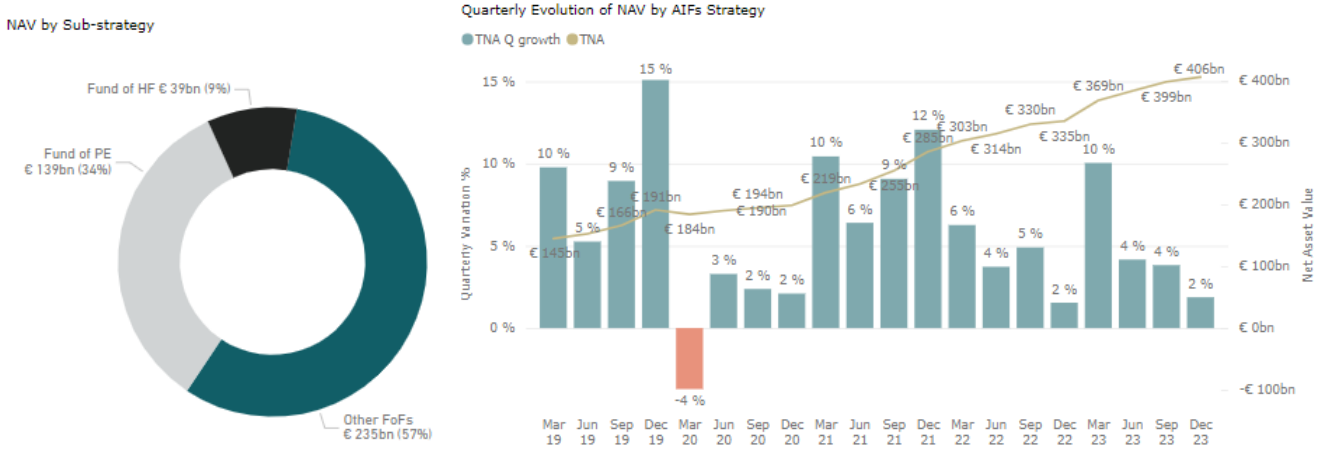
Individual Exposures (long and short)



Source: AIFMD data as at 31.12.23 from all LU AUT AIFMs

4.4 Funds of funds

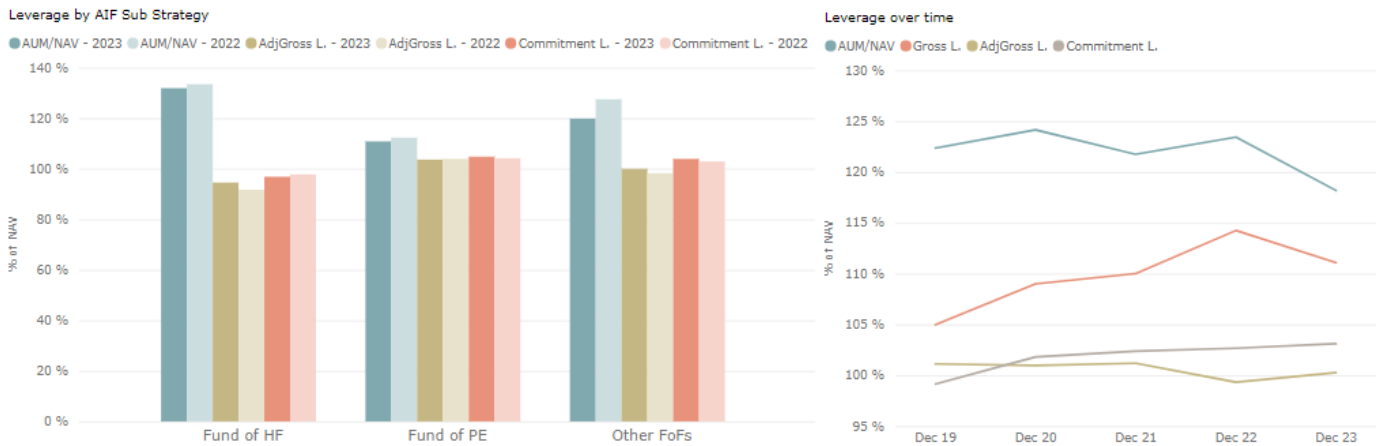
4.4.1 NAV by predominant Sub Strategy and over time



Note: the chart on the right-hand side only considers the subset of AIFs that reports on a quarterly basis to provide meaningful trends over the quarters. Thus, the total NAV evidenced in the present chart will underestimate the real total NAV by strategy.

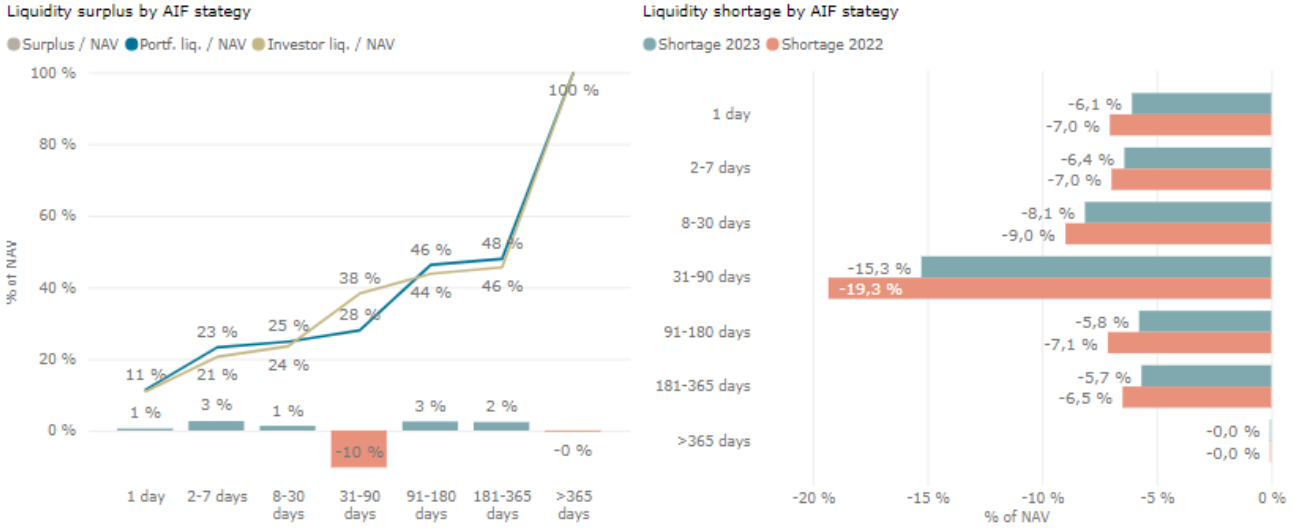
Source: AIFMD data as at 31.12.23 from all LU AUT AIFMs

4.4.2 Leverage by predominant Sub Strategy and over time



Source: AIFMD end of year data from all LU AUT AIFMs

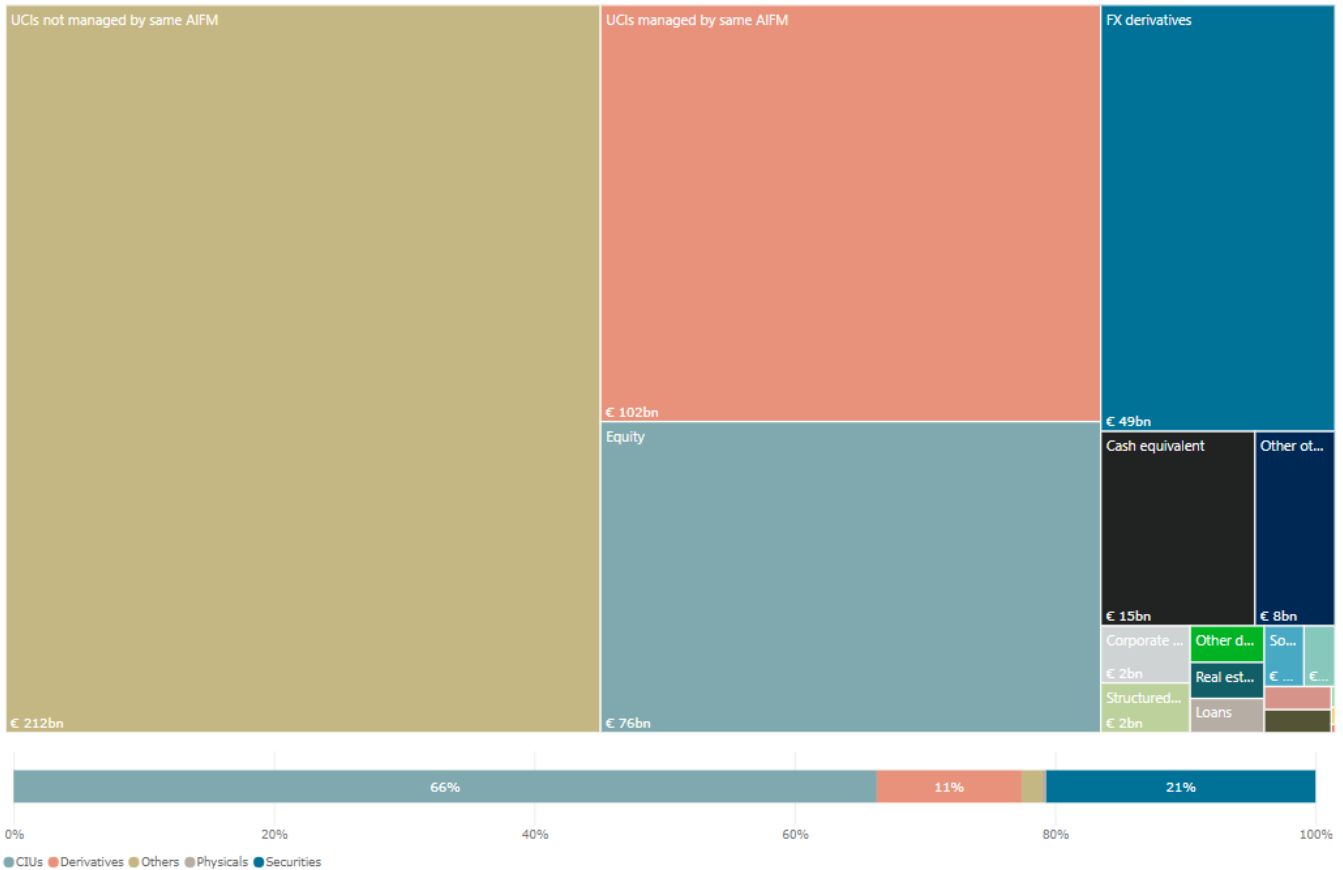
4.4.3 Liquidity profile



Source: AIFMD data as at 31.12.23 from all LU AUT AIFMs

4.4.4 Main Sub Asset exposures (in EUR)

Individual Exposures (long and short)



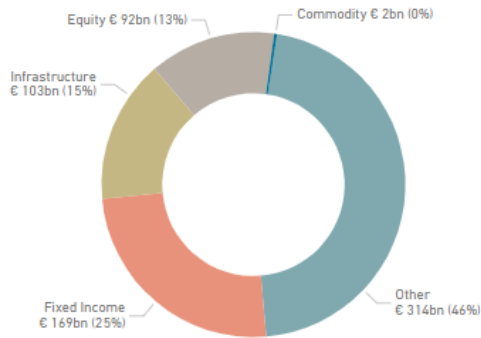
Source: AIFMD data as at 31.12.23 from all LU AUT AIFMs



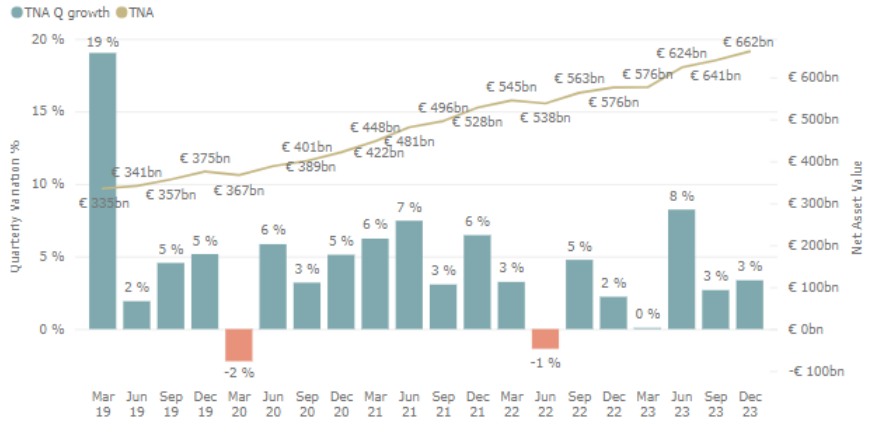
4.5 Other AIFs

4.5.1 NAV by predominant Sub Strategy and over time

NAV by Sub-strategy



Quarterly Evolution of NAV by AIFs Strategy

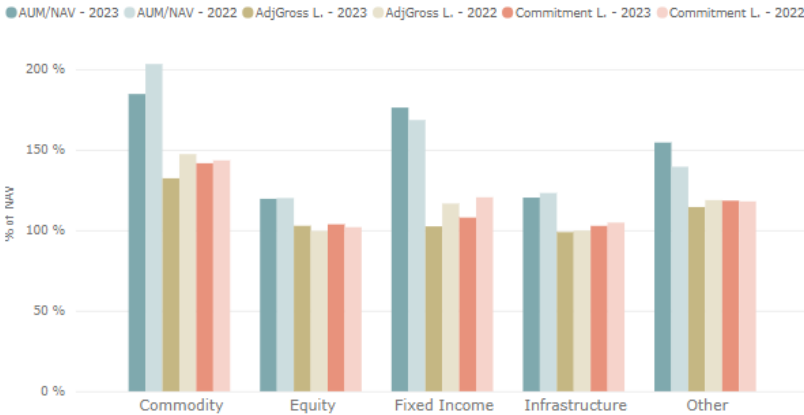


Note: the chart on the right-hand side only considers the subset of AIFs that reports on a quarterly basis to provide meaningful trends over the quarters. Thus, the total NAV evidenced in the present chart will underestimate the real total NAV by strategy.

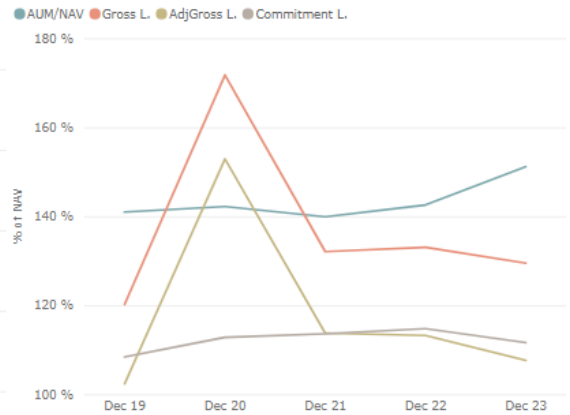
Source: AIFMD data as at 31.12.23 from all LU AUT AIFMs

4.5.2 Leverage by predominant Sub Strategy and over time

Leverage by AIF Sub Strategy



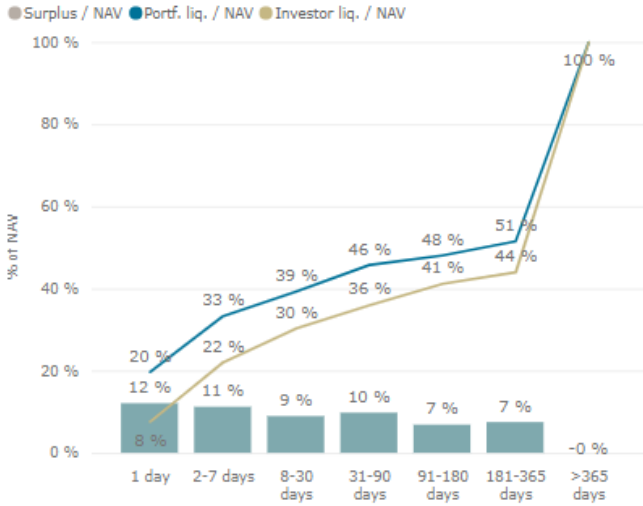
Leverage over time



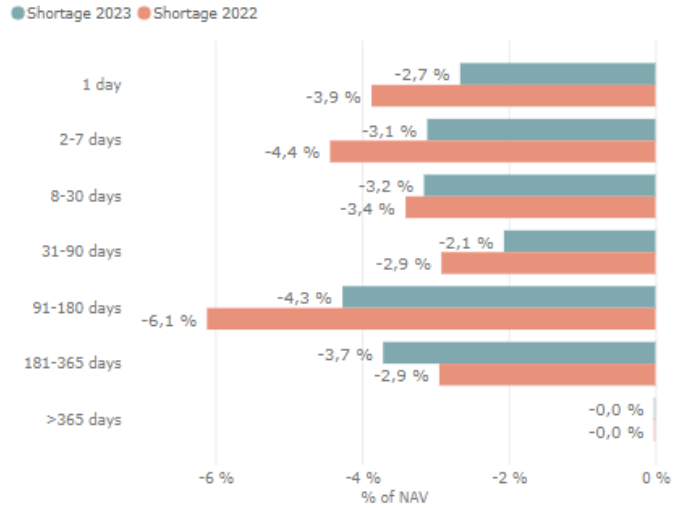
Source: AIFMD end of year data from all LU AUT AIFMs

4.5.3 Liquidity profile

Liquidity surplus by AIF strategy



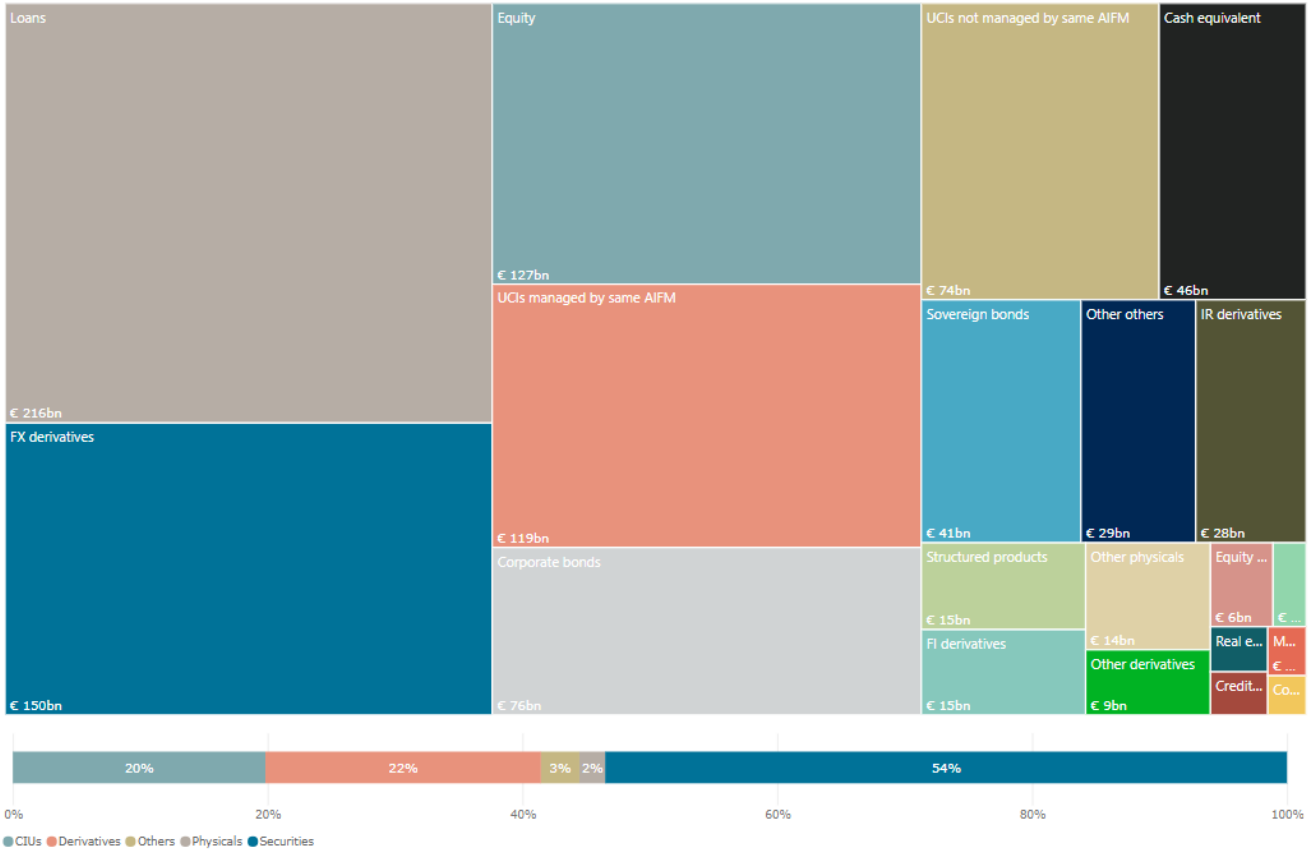
Liquidity shortage by AIF strategy



Source: AIFMD data as at 31.12.23 from all LU AUT AIFMs

4.5.4 Main Sub Asset exposures (in EUR)

Individual Exposures (long and short)



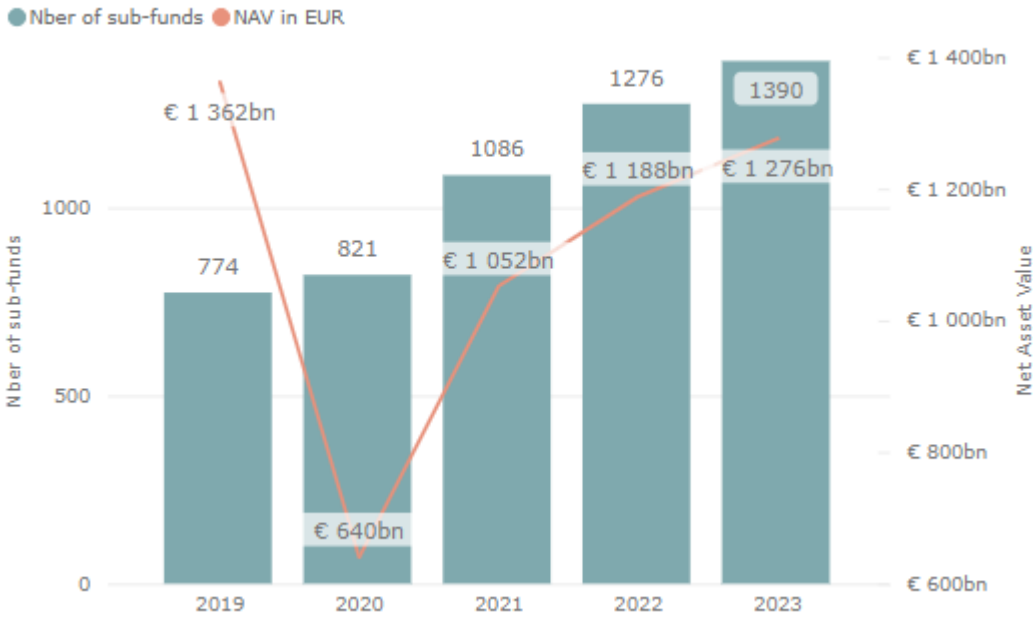
Source: AIFMD data as at 31.12.23 from all LU AUT AIFMs

5. Non-EU AIFMs in Luxembourg (NPPR)

5.1 Market Overview

5.1.1 LU NPPR market trend

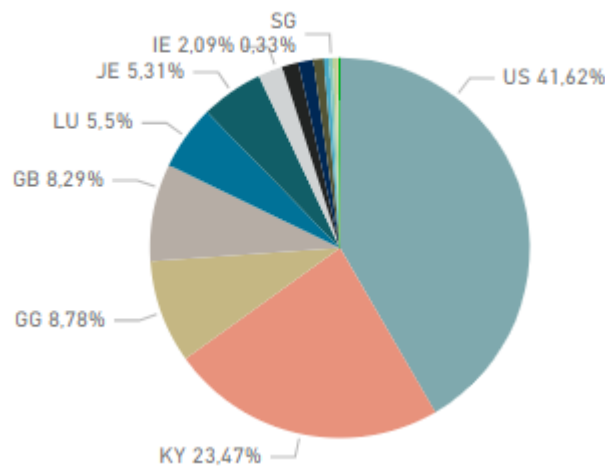
Evolution of LU AIFs Market



Source: AIFMD data as at 31.12.23 from all Non-EU AIFM under LU Private Placement Regime

5.1.2 LU NPPR AIF's domicile

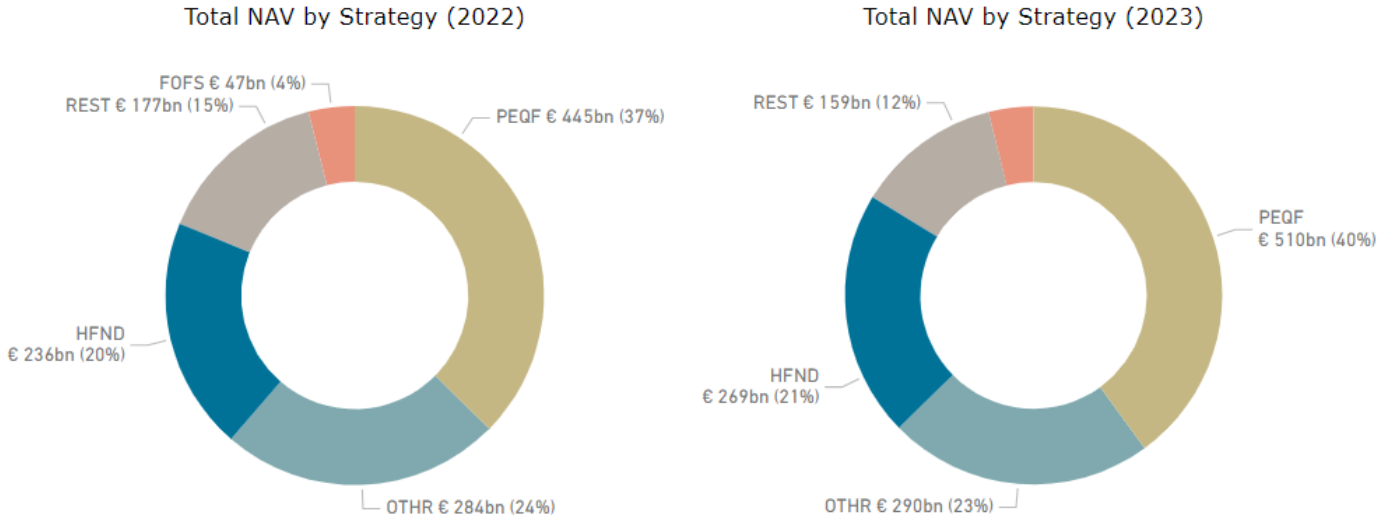
Breakdown of LU NPPR AIF per domicile (%NAV)



Source: AIFMD data as at 31.12.23 from all Non-EU AIFM under LU Private Placement Regime



5.1.3 Breakdown of LU NPPR AIFs per Strategy in 2022 and 2023



Source: AIFMD data as at 31.12.23 from all Non-EU AIFM under LU Private Placement Regime

6. List of abbreviations

AIFMD	Alternative Investment Funds Managers Directive
AUM	Asset Under Management
AUT AIFMs	Authorised Alternative Investment Funds Managers
EEA	European Economic Area
FOFS	Funds of Funds
HFND	Hedge Funds
LMT	Liquidity Management Tools (e.g. notice period, gating/deferral)
LU AIFMs	Alternative Investment Funds Managers domiciled in Luxembourg
LU AIFs	Alternative Investment Funds based in Luxembourg
NAV	Net Asset Value
NCA	National Competent Authority
NONE	AIF type where the investment strategy of the AIF does not permit a predominant AIF type to be identified
Non-LU AIFs	Alternative Investment Funds not based in Luxembourg
NPPR	National Private Placement Regime
OTHR	Other AIFs
PEQF	Private Equity Funds
REG AIFMs	Registered Alternative Investment Funds Managers
REST	Real Estate Funds
SPV	Special Purpose Vehicle



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