

By email

29 September 2025

To: Senior Executive Officers (SEOs) of FSRA Authorised Fund Managers  
CC: Compliance Officers

Dear SEO

**ADGM FSRA implements regulatory reporting requirements for funds**

Following consultation earlier this year, on 25 September the FSRA published final Rules detailing the periodic reporting requirements for Fund Managers of both Domestic Funds and Foreign Funds (“new Rules”). The new Rules require that Fund Managers submit data regarding portfolio holdings, and other key information, to the FSRA on a periodic basis. The data specification and the reporting frequency will depend on the nature of the Fund.

We are writing to announce our intention to undertake a phased approach to implementation of the new Rules. Under this approach:

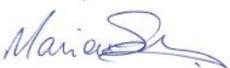
- We will commence implementation of the reporting with a limited cohort of Funds. The relevant Fund Managers will be contacted by FSRA Supervision to inform them of the form and the frequency by which they must submit data to the FSRA.
- Those Fund Managers not contacted by FSRA Supervision do **not** need to submit data to the FSRA until further notice.

We have chosen to adopt this approach to ensure a smooth transition to the new reporting requirements.

Whilst those Fund Managers not contacted by the FSRA will not be required to submit periodic Fund reports until otherwise determined, you should familiarise yourself with the data required to be submitted under the new Rules, contained in the templates that we have published alongside our Regulatory Update. Doing so will allow you to prepare your operations teams to undertake the periodic submissions in due course, facilitating a seamless shift to the new framework.

Any comments or questions regarding the new framework should be directed to your supervisor or the Pooled Team, as appropriate.

Your sincerely



Mary Anne Scicluna  
Senior Executive Director, Supervision