



AUSTRIA: A GUIDE TO INTERNATIONAL FUND DISTRIBUTION

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ABOUT IRISH FUNDS

About Irish Funds

Established in 1991 the Irish Funds Industry Association (Irish Funds) is the representative body of the international investment fund community in Ireland. We represent the fund promoters / managers, administrators, custodians, transfer agents and professional advisory firms involved in the international funds industry in Ireland, with more than 14,000 funds and net assets of more than €5.2 trillion.

The objective of Irish Funds is to support and complement the development of the international funds industry in Ireland, ensuring it continues to be the location of choice for the domiciling and servicing of investment funds. Through its work with governmental and industry committees and working groups, Irish Funds contributes to and influences the development of Ireland's regulatory and legislative framework. Irish Funds is also involved in defining market practice through the development of policy and guidance papers and the promotion of industry-specific training.

Table of Contents

About Irish Funds	2
Market Overview	3
Key Distribution Channels	4
Initial & Ongoing Requirements	5
Regulatory Authority, Fees & Timings	6
Private Placement	7

MARKET OVERVIEW

Market Snapshot

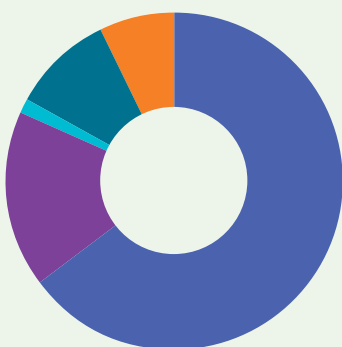
Below is a segment breakdown of the EUR197 billion of institutional assets available in the Austrian market:

Pension Funds	33
Central Bank	3
Institutional	19
Corporate	14
Insurance & ULB	128

The below represent some of biggest institutional investors in the Austrian market:

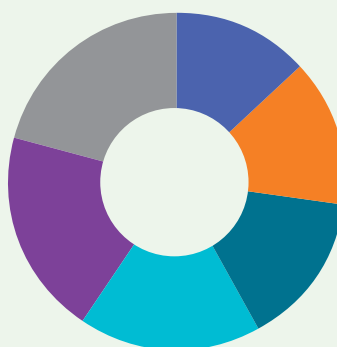
- Erste Group
- VBV
- VIG
- Raiffeisen Group
- Valida
- UNIQA

Total (Bn) Assets by Segment:



- Insurance & ULB: **128**
- Corporate: **14**
- Institutional: **19**
- Central Bank: **3**
- Pension Funds: **33**

Top countries where Irish funds are registered for sale¹: (Austria is 8th)



- Austria: **2335**
- Netherlands: **2568**
- Switzerland: **2711**
- France: **3009**
- Germany: **3187**
- UK: **3547**

KEY DISTRIBUTION CHANNELS

Distribution & Marketing

There are no restrictions around marketing funds which have been authorised for distribution in Austria.

Vienna accounts for circa 85-90% of the market in Austria. As a small country, often a hand-held approach is more effective when dealing with clients or prospects. Having local representation is not a market requirement, but it is certainly a preference for investors in Austria.

Where an investment firm has no local presence, it is common for private placement to be utilised as an effective channel for distribution.

Further details on Private Placement in Austria is detailed on page 7. There are very few Irish funds listed on an Austrian stock exchange.

See below grid showing the more commonly used B2B trading platforms used by investors in Austria:**

Rank	PLATFORM	AUA (€BN)	YOY GROWTH	MARKET SHARE	FOCUS
1	Bank Austria Finanzservice	€7.9	20.0%	38.9%	B2B adviser
2	Allfunds Bank	€3.2	43.9%	15.6%	B2B institutional
3	Hellobank	€2.2	10.0%	10.8%	B2B adviser / D2C
4	Die Platform	€2.0	7.0%	9.8%	B2B adviser
5	Capital Bank	€1.8	n/a	8.6%	B2B adviser
6	dad.at	€0.8	n/a	3.9%	B2B adviser / D2C
7	Other	€2.5	-	12.4%	-
	Total	€20.4		100.0%	

** Note the above is sourced from 2018 Platforum reporting based on 2017-year end data. Platforum did not produce this reporting for Austria in 2019.

INITIAL & ONGOING REQUIREMENTS

Documentation

- Prospectus
- Supplements (if applicable)
- Country Supplement (if applicable)
- Key Investor Information Document (“KIID”)
- Latest fund rules / instruments of incorporation
- Latest audited annual financial statements and any subsequent unaudited half-yearly reports (or the latest available)
- Evidence of payment of regulatory fee

Translation Requirements

- The KIID for each share class of a UCITS marketed in Austria must be translated into German.
- All other documents and information can be submitted in German or English.

Local Agent Requirements

- The management company must appoint an Austrian paying and information agent prior to passporting into Austria and confirm the details of the entity to the FMA.
- Estimate paying and information agent costs €1,500 – 2,000 (depending on number of sub funds) per annum

Ongoing Requirements

- The FMA must be informed promptly of any amendments to the fund documentation provided with the initial passport notification by submitting the document and indicating the type of amendment;
- Changes in marketing arrangements or changes in the share classes being marketed in Austria to be notified to the FMA;
- Notification to the FMA of the latest audited annual and unaudited semi-annual financial statements is required within the appropriate timelines

Tax

The Oesterreichische Kontrollbank Aktiengesellschaft (OeKB) must be notified of the appointment of an Austrian tax representative.

Tax Reporting agents will often provide PKG Reporting services also. PKG reporting is a requirement for Pension Funds in Austria.

Tax reporting services and associated fees are applicable.

Country specific disclosures

The FMA suggests including a list of all sub-funds which are passported into Austria as well as the details of the Austrian paying and information agent in the prospectus (or in a separate Country Supplement for Austria).

Website

Yes.

A UCITS approved in another member state shall ensure that the latest version of all information and documents any translations thereof, are always available on a website accessible to the FMA by electronic means and shall inform the FMA of any change to these documents and their availability by electronic means.

REGULATORY AUTHORITY, FEES & TIMINGS

Regulatory Authority:

Financial Market Authority (“FMA”)

Email:

funds@fma.gv.at

Information concerning the public offering of UCITS in Austria pursuant to art. 140 of the Investment Funds Act (InvFG 2011)

<https://www.fma.gv.at/download.php?d=1779>

Note: Evidence of payment of regulatory fees detailed below must be provided to the FMA with the initial passport notification.

Initial Notification fee:

€1,100 (includes 2 sub funds)

€220 for each additional sub fund

Regulator website list of fees:

<https://www.fma.gv.at/en/investment-funds-and-investment-fund-managers/ucits-and-investment-fund-management-companies/annual-fees-2/>

Annual fee:

€600 (includes 1 sub fund)

€200 per each additional sub fund

10 Days

Following submission of the passport notification together with the suite of ancillary documents, the Home state Regulator has 10 business days in which to advise the Management Company that its notification has been transmitted to the Host State regulator.

Marketing may commence as soon as the Home State Regulator has informed the Management Company of this.

PRIVATE PLACEMENT

Based on the regulatory authority of Austria's publication "Information pursuant to Art. 91 Para 3 of Directive 2009/65/EC and Art. 30 Para 1 and 2 of Commission Directive 2010/44/EU on relevant administrative practice and legal requirements pertaining to the notification and distribution of UCITS" and more specifically the definition of a "public offering" in this publication, private placement of a UCITS is possible in Austria.

The number of persons (which should be a specified person or specified group of persons as opposed to an unspecified "public offering") whom an offering should be made to, should not exceed 149 persons in total.



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