28 September 2026

AIFC Participants
authorised to carry out
regulated activity of Managing a
Collective Investment Scheme

Re: Results of Thematic Review of Fund Managers

Dear Senior Executive Officers,

Astana Financial Services Authority (the 'AFSA') is writing to Senior Executive Officers of AIFC Participants authorised to carry out regulated activity of Managing a Collective Investment Scheme to inform them of the results of the thematic review of fund managers ('Thematic Review') held in 2026. This Dear SEO letter sets out key findings identified during the review and AFSA expectations and recommendations to remedy them. The findings and observations are set out in the annexed Thematic Review Report.

Scope of the Thematic Review

The Thematic Review covered 19 sampled firms, that together managed 98% of assets under management at the nearest date of commencement of review. The reviewed population also included Authorised Firms that combine the regulated activity of Managing a Collective Investment Scheme with other types of regulated activities. AFSA is satisfied that this sampling approach provides a sufficient level of confidence in the findings and observations on fund managers' arrangements for:

- Conduct of Business and fund management practices; and
- Systems and controls on calculations and monitoring of Capital Resources and Liquid Assets and compliance with AIFC Rules.

Key Findings

The Thematic Review identified weaknesses in firms' fund governance practices, client onboarding processes, systems and controls on calculation and monitoring of prudential requirements, and in the communication of relevant information to stakeholders, including their fund investors, and in the disclosures required by AIFC Rules and Regulations to be made to AFSA, **specifically in**:

- process of customer due diligence;
- management of conflicts of interest and transactions with related-parties;

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- fund governance and management practices;
- exceeding the licensing perimeter and departures from the disclosed investment strategy;
- systems and controls on calculations and monitoring of Capital Resources and Liquid Assets and compliance with PRU INV;
- involvement of firms' Governing Bodies and independent Directors in firms' governance; and
- failures and inconsistencies in the disclosure of information to clients and AFSA.

The annexed public Report on the Thematic Review sets out the findings and observations for **the AIFC community, and outlines AFSA recommendations and expectations** for the fund management industry in the AIFC. These recommendations and expectations, set out below, reflect AFSA's supervisory guidance and market good practices. They do not constitute additional Rules and do not override any individual requirements separately issued by AFSA to a specific AIFC Participant.

AFSA Expectations

Overall, AFSA expects that AIFC Participants authorised to carry out regulated activity of Managing a Collective Investment Scheme **will implement recommendations and enhance their**:

- Governance and compliance arrangements for AML/CFT, conflicts of interest, valuation and fair treatment of Unitholders;
- Independent review, approval and documentation of related-party transactions, asset valuations, fees and preferential terms;
- Recordkeeping, reconciliation and regulatory reporting processes that allow transactions, ownership and Fund Property to be traced and reproduced promptly;
- Written systems and controls on calculation and monitoring of Capital Resources and Liquid Assets, and compliance with PRU INV;
- Risk management systems and their effective integration with systems and controls on calculation and monitoring of Capital Resources and Liquid Assets and compliance with PRU INV; and
- Corporate governance frameworks, including the role of independent directors in PRU Dealing Investment Firms, and the engagement of Governing Bodies in overseeing and ensuring the efficiency of systems and controls on calculation and monitoring of Capital Resources and Liquid Assets and compliance with PRU INV.

Next Steps

The **AFSA will issue individual requirements and recommendations** to firms reviewed within this Thematic Review, if the case requires, and expects them to be implemented within the given timeframe. In addition:

- **Sampled AIFC Participants, that did not receive individual requirements**, are expected to implement recommendations mentioned in this Thematic Review by 31 December 2026. Failure to do so by this date does not, of itself, constitute a breach of the requirements, however, AFSA will take a Participant's progress against this date into account in its ongoing risk assessment and supervisory engagement with that Participant, and may exercise its supervisory powers, including issuing individual requirements, where it considers this necessary;

- AIFC Participants, authorised to carry out regulated activity of Managing a Collective Investment Scheme, but **were not sampled or have been authorised by AFSA after the review date**, are expected to conduct a self-assessment of their own activities, systems and controls and implement recommendations and expectations of the AFSA;

- The AIFC Participants, authorised by AFSA to carry out **other types of investment business activities**, are recommended to take note of recommendations and expectations of the AFSA and implement them where applicable; and

- **Firms applying to AFSA for authorisation to carry out regulated activities of investment business in the AIFC**, including but not limited to Managing a Collective Investment Scheme, are expected to take note of recommendations and expectations of the AFSA and implement them where applicable in their applications and activities.

The implementation of the recommendations set out in this Dear SEO letter and in the annexed Thematic Review Report will support fair, efficient, transparent and orderly market of Collective Investment Schemes, foster and maintain its financial stability, and protect the interests of investors and users of financial services.

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