Client Information

on changes affecting the development of EMIR REFIT

March 26, 2024.

Dear Clients,

We would like to inform you about the latest information and changes regarding KELER Trade Reporting System - EMIR.

The new reporting requirements will take effect on April 29,2024. The subjects of the reporting obligation and the scope of transactions to be reported will not change, so futures transactions and the parties involved in them will continue to be affected.

We would like to share with you some information and clarifications that we consider important for our clients.

1. Updating the existing CLC code according to EMIR REFIT standard

After April 29,2024, if the 'Other counterparty' does not have an LEI code, it must be reported in the field 'Counterparty2' by merging the LEI code of the participant in field 'Counterparty1' with the unique customer ID (CLC code) held by 'Counterparty1'. The merging must be done by adding the unique ID of the natural person held by 'Counterparty1' to the LEI code of 'Counterparty1'.

Given that the 'Counterparty2' field of live reports already submitted cannot be updated, REGIS-TR, the repository used by KELER, has developed an automatic procedure to ensure that any modifying lifecycle and original reports of open transactions received after April 29,2024 can be seamlessly linked. REGIS-TR's solution is to merge the LEI code of 'Counterparty1' appearing in the 'Counterparty1' field and the unique *identifier* provided by 'Counterparty1' appearing in the 'Counterparty2' field, in the optimal case, to form a new unique ID of up to 72 alphanumeric characters.

We kindly ask our clients to take the above into account when making changes to live reports after the change, i.e. to include the consolidated *identifier* in the Counterparty2 field if necessary (in the absence of LEI code).

The relevant part of the EMIR REFIT Regulation is as follows:

"ISO 17442 Legal Entity Identifier (LEI) consists of 20 alphanumeric character codes included in the LEI dataset published by the Global LEI Foundation (GLEIF) or up to 72 alphanumeric character codes for natural persons acting as individuals who are not entitled to an LEI based on their ROC declaration.
The natural person identifier code shall be the combination of the Party 1 entity identifier and the unique identifier assigned to the natural person(s) by Party 1 for regulatory reporting purposes and consistently applied."

2. CSV file name convention rules

We ask our partners to appply the file name convention for CSV files.

The structure of the filename:

Submitting partner's LEI code_EMIR report type with a target name identifier ('auth030' or 'auth108')_Value of the report package ActionType in 4 characters_Time stamp in seconds (YYYYMMDDHH24MISS)_Serial number in three characters, padded with leading zeros

pl.:' 529900MHIW6Z8OTOAH28_auth030_MODI_20231212130101_001.csv'

- The Action type value set:
  - Derivative (auth.030) for report package:

    { 'NEWT', 'MODI', 'CORR', 'TERM', 'EROR', 'REVI', 'VALU', 'POSC'}

  - For MarginData (auth.108) report package:

    { 'MARU', 'CORR'}

3. XML format report package content AppHdr->MsgDefIdr

ISO 20022 expects the value of "MsgDefIdr" to be

- Derivative (auth.030) for report package 'auth.030.001.03_ESMAUG_DATTAR_1.1.0'
- MarginData (auth.108) for 'auth.108.001.01_ESMAUG_DATMDA_1.1.0'

4. Content of report packages in CSV and XML formats according to AxtionType

In CSV format, a report package can only contain reports for one type of ActionType.

It is recommended that a submitted report package in XML format should only contain reports corresponding to one type of ActionType.

5. Requirements for RptgTmStmp data

A RptgTmStmp

(xpath:../Document/DerivsTradRpt/TradData/Rpt/Rvvv/CtrPtySpcfcData/RptgTmStmp)

- shall not be earlier than 00:00 hours on the calendar day preceding the date of receipt by the KELER-TR;
- must be the CreDt date in the AppHdr ;
- The value of CreDt must fall on the same day as the value of RptgTmStmp of the Reports in the Report Package.

- CreDt should be greater than or equal to the maximum value of RptgTmStmp displayed in the reports.

6. **REGIS-TR report package inclusion rule.**

KELER's trade repository provider, REGIS-TR, only accepts reporting packages during its opening hours, and we will be able to provide more information on this once the final date has been set. For report packets received during opening hours, our service provider will check that the value of RptgTmStmp (see point 5) is later than zero hours of the calendar day preceding the day of receipt by REGIS-TR.

Consequently, REGIS-TR will reject reports that were created before a weekend or a public holiday at the end of the day (after closing) with the value RptgTmStmp corresponding to the day of creation and it was no longer possible to submit them to REGIS-TR during the opening hours of REGIS-TR on that day.

If you have any questions or comments about these information, please send them to tradereporting@keler.hu.

Best regards:

KELER Ltd.