EMIR REFIT GYIK

1. **Have any changes been made to the interface (not the required data, but the way they are transferred)?**
   Response: There will be a change to the main menu in the TR system interface. However, the way of uploading will remain the same. Information on transactions before the EMIR REFIT changeover can be found under the EMIR Monitoring main menu. Information on transactions after EMIR REFIT migration can be found under the EMIR-REFIT Monitoring main menu.

1. **When manually uploading an XML file to the TR system, what file naming conventions must be followed?**
   Response: KELER does not expect a file name convention when uploading an XML file. We recommend to use a self-recognisable and meaningful file name.

2. **When manually uploading an XML file to TR system, is it mandatory to use upper case in the file records?**
   Response: The XSD description published by KELER must be taken into account.

3. **When manually uploading an XML file to TR system, what is the expected file encoding?**
   Response: Both UTF-8 with BOM and UTF-8 without BOM encoding are accepted.

4. **When manually uploading an XML file to TR system, does the file need a header section per transaction?**
   Response: No, XML files must be generated according to the WSDL/XSD package published by KELER.

5. **Is it possible to use a flat file when manually uploading a report package to the TR system?**
   Response: Yes, in case of CSV file. For more information, please refer to the CSV to XML template prepared by REGIS-TR and published by KELER.

6. **Is there a file size limit when manually uploading a report package to TR system?**
   Response: The file size limit for XML files is 4 Mb. For CSV files, there is a limit on the number of records per Action Type.

7. **When manually uploading a report package to TR system, what is the maximum number of transactions to be reported in a report package?**
   Response: There is no limit for XML files. For CSV files, there is a record count limit by Action Type, broken down as follows:

ActionType	Report max pcs
NEWT = New	100
MODI = Modify	100
CORR = Correct	100
TERM = Terminate	100
EROR = Error	100
REVI = Revive	100
VALU = Valuation update	300
POSC = Position component	100
MARU = Margin Update	100
CORR (Margin) = Correct	100

8. **Regarding reason codes, error codes and file names to be used for manual uploading of report packages to KELER TR, is there a technical description available that indicates which response codes and error codes can be expected and their file name (EN/EN)?**

   <u>Response:</u> Yes, you can find answers to these questions in the EMIR REFIT 2024 SOAP client service description and the CSV to XML template, ESMA validation rules. The documents can be found on the KELER website under the Services/Trade Reporting/EMIR/Documents/EMIR REFIT Supporting Documents tab.

   This is a summary of the SOAP document for the Status Code explanation:

Status code/ Status code	Language/Language	Status description / Status description
ACPT	EN	Accepted by REGIS-TR
ACPT	EN	Adopted by REGIS-TR
FLSD	EN	Failed to send to REGIS-TR
FLSD	EN	Unsuccessful transmission to REGIS-TR
RCVD	EN	Send to REGIS-TR
RCVD	EN	sent to REGIS-TR
RCVK	EN	Received
RCVK	EN	Retrieved from
RJCK	EN	Received with error
RJCK	EN	Incorrect received
RJCT	EN	Rejected by REGIS-TR
RJCT	EN	Rejected by REGIS-TR
SENT	EN	Sending to REGIS-TR in progress
SENT	EN	Sending to REGIS-TR in progress

9. **Is there a user description available for the downloadable status response report on received or erroneous reports in the KELER TR system, which describes the structure of the downloadable status report, what fields are included and what they may contain?**
    <u>Response:</u> No such KELER document is available. Response report can only be downloaded from the interface in XML format (according to auth.092).

10. **Does the TR system have an automatic email notice function that the user can set up and through which the KELER TR system can notify the user that the status of the uploaded report has been updated?**
    <u>Response:</u> This is not possible in KELER TR system. However, users can monitor changes to the status of their reports in the interface.

11. **What are the data and technical requirements for connecting to the KELER TR system via WebService?**
    <u>Response:</u> The EMIR REFIT 2024 SOAP client service description contains the signature method. The customer can send a text email to KELER via Service Desk to indicate his request for WebService.

12. **When uploading a report package to the KELER TR system, which XSD descriptors are used for XSD validation of reports and which version of these descriptors is integrated in the TR system?**
    <u>Response:</u> ESMA issued the last XSD package related to EMIR REFIT compliance on 27 November 2023. KELER's TR system is based on this XSD version issued by ESMA. In case ESMA issues a new XSD version, it will also be transferred to the KELER TR system.

13. **Based on the EMIR REFIT documents, the following questions have been raised about the Header part of the XML file:**
    * **what is the logic for the 'AppHdr/Fr/OrigId/Id/OrigId/Othr/Issr' tag in the header?**
      <u>Response:</u> LEI codes are expected as identification data in
      ../AppHdr/Fr/OrgId/Id/OrgId/Othr/Id and
      ../AppHdr/To/OrgId/Id/OrgId/Othr/Id.
      The ../AppHdr/Fr/OrgId/Id/OrgId/Othr/Id must contain the LEI code of the sending partner.
      And in ../AppHdr/To/OrgId/Id/OrgId/Othr/Id the KELER Zrt. LEI code of the KELERER LEI.

- **what is the logic for the value in the 'AppHdr/To/OrigId/Id/OrigId/Othr/Issr' tag of the header?**
  Answer: ../AppHdr/Fr/OrigId/Id/OrigId/Othr/Issr and ../AppHdr/To/OrigId/Id/OrigId/Othr/Issr are optional data, they do not need to be specified.
  It is our understanding that in this section, the organisation issuing the identification data identifying the legal entity can be entered in text form, max 35 characters long.
  Since we expect a LEI code, which is kept by GLEIF, the ../Issr is not required.

- **in relation to the 'AppHdr/BizMsgIdr' tag in the header, in this field, the identifier resulting from the linking of the entity LEI code and the ID of the report by current line numbering, should not be confused with the identifier of the SFTR reports with the same structure, which are also reported via KELER? Is it not necessary to include in this identifier some information referring to EMIR?**
  Response: In the ../AppHdr/BizMsgIdr ID, the first 20 characters of ../AppHdr/Fr/OrgId/Id/OrgId/Othr/Id are expected to be displayed.
  BizMsgIdr is a string of 35 characters.
  The remaining 15 characters after the LEI code can and should ensure the uniqueness of the BizMsgIdr identifier.
  The uniqueness of the identifiers ../AppHdr/BizMsgIdr in EMIR REFIT and SFTR is handled separately for each service.

14. **Will the possibility of batch file upload continue to exist in the new EMIR reporting process? Can reports be batch uploaded on the Webservice?**
  Response: Each EMIR-REFIT report package can contain several reports, either uploaded via an interface or via a web service to KELER TR-EMIR. The option to select a maximum of 100 files in the file selection window is also retained for surface uploads.

15. **The SOAP message is digitally signed using the same methodology and certificate as used for the APA service by KELER?**
  Response: For the EMIR-REFIT report package submitted via the web service, the report package submission certificate management report package signature requirement is the same as for the APA service.

16. **After 29 April 2024, will the possibility of manually uploading reports in the KELER TR system be discontinued and will only uploading via WebService remain?**
  Response: Both solutions will be possible, both via WebService and via surface uploading, the KELER TR system will receive the report package.

17. **Will the KELER TR system retain the possibility to post messages by message type after 29 April 2024?**
    Response: ESMA requires that there will be two types of reports in EMIR REFIT.
    - Derivative (auth.030 XSD)
    - MarginData (auth.108 XSD)

    In the future, the current report type level breakdown will also appear at the ActionType level for Derivative and MarginData report types.
    ActionTypes appearing in the Derivative report type:
    - NEWT = New
    - MODI = Modify
    - CORR = Correction
    - TERM = Terminate
    - EROR = Error
    - REVI = Revive
    - VALU = Valuation update
    - POSC = Position component

    ActionTypes that appear in the MarginData report type.
    - CORR = Correction
    - MARU = Margin Update

    Yes, it is accepted that in a Derivative or MarginData report type package, only reports belonging to one type of ActionType should appear.

18. **Is it possible to get sample XMLs for all message types in KELER TR after 29 April 2024?**
    Response: Yes, a sample XML file for each type of report can be found on the KELER website under Services/Market Reports/EMIR/Documents/ EMIR REFIT Supporting Documents.