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LIST OF MODIFICATIONS

| REVISION NO./ VERSION NO. | DATE | AUTHOR | CHANGE DESCRIPTION |
|--------------------------------------|-------------|-------------------|---|
| 1.0 | 27/11/2023 | Euronext Clearing | First version |
| 2.0 | 15/02/2024 | Euronext Clearing | <p>Second version</p> <p><u>Section 3 – Trade Data</u></p> <p>Field 1.3 – Entity responsible for Reporting – field removed;</p> <p>Field 1.11 – Nature of counterparty 2 – Removed the value NORE and added the value "C";</p> <p>Field 2.44 – Expiration Date – Removed the value D01R. Date and added the value D01R.Expiry;</p> <p>Field 2.46 – Final contractual settlement date – Added the correct value D01R.Date</p> <p>Field 2.47 – Delivery Type – added the correct value PHYS</p> <p>Field 2.60 – Total notional quantity of leg 1 – Added the factor Multiplier (Multiplier x Quantity)</p> <p>Field 2.153 – Event Date – Added the correct value 'Date' from D01R.</p> <p><u>Section 4 – Position Data</u></p> <p>Field 1.11 – Nature of Counterparty 2 – removed the value 'NORE' and added the value "C";</p> <p>Field 2.48 – Price – field removed;</p> <p>Field 2.55 – Notional amount of leg 1 – notes added as for the same field for Trades Data;</p> <p>Field 2.60 – Total notional quantity of leg 1 – added the factor Multiplier</p> <p>Field 2.134 – Strike price – removed the notes</p> <p>Field 2.35 – Other master agreement type – Added the correct value "CCPClearingConditions"</p> <p><u>Section 5 – Valuation Data</u></p> <p>Field 1.3 – Entity responsible for Reporting – field removed;</p> <p>Field 2.21 – Valuation Amount – Added the formula</p> <p><u>Section 6 – Margin Data</u></p> <p>Field 3.3 – Entity responsible for Reporting – field removed;</p> <p>Field 3.7 – Collateral Timestamp – modified the date with "24-02-2023 23:00:00Z"</p> <p>Field 3.15 – Variation margin posted by the counterparty 1 (pre-haircut) – modified the sign of the amount with "negative"</p> |

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|--|--|--|---|
| | | | <p>Field 3.16 - Variation margin posted by the counterparty 1 (post-haircut) – modified the sign of the amount with “negative”</p> <p>Field 3.23 – Variation margin collected by the counterparty 1 (pre-haircut) – modified the sign of the amount with “positive”</p> <p>Field 3.24 – Variation margin collected by the counterparty 1 (post-haircut) – modified the sign of the amount with “positive”</p> |
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1. INTRODUCTION

This document provides clarification regarding the compliance with the EMIR technical standards and the revised rules on reporting under EMIR REFIT, which will apply from 29th April 2024, and particularly for the market of Derivatives managed by Borsa Italiana (IDEM) and cleared by Euronext Clearing.

The European Market Infrastructure Regulation (EMIR) is an EU regulation aimed at increasing transparency and reducing risk in financial markets. Regulatory reporting under EMIR refers to the preparation and submission of mandatory reports on derivative contracts traded by European counterparties. Reporting under EMIR covers all derivative contracts, including for example, Futures, Options, Swaps, Forward Rate Agreements and other similar financial instruments.

Counterparties involved in trading these instruments are required to submit detailed reports on the derivative contracts they traded, including information on value, parties involved, maturity and other relevant data.

EMIR reporting applies to both Financial and Non-Financial counterparties, such as commercial firms that use derivative contracts to hedge market risk. However, reporting needs vary according to the type of counterparty involved.

EMIR reporting requires the submission of periodic reports on outstanding derivative contracts and new traded contracts, as well as ad hoc reports in the event of exceptional events, such as the termination of a counterparty or the liquidation of a derivative contract.

The submission of EMIR reports must be done through Trade Repository (TR) approved by the relevant regulatory authority, such as the European Securities and Markets Authority (ESMA). EMIR reports are subject to quality checks and analysis by regulators to ensure regulatory compliance and to identify any risks in the financial system.

2. IDENTIFICATION OF TRADES, POSITIONS AND COUNTERPARTIES

ESMA¹ clarifies that the counterparties should not create a new UTI code for outstanding derivatives (for legacy UTI please refer to the last version of the EMIR Reporting Guide of 11th May 2022), even if the original UTI code is not fully compliant with, e.g., the new format requirements under the revised technical standards. Similarly, the TRs should follow the validation rules in this regard and should not reject reports due to UTIs that are not fully compliant with the new requirements for those derivatives that were concluded before the reporting start date of the revised technical standards.

2.1 UTI for trades

A Unique Trade Identifier (UTI) code, defined by Euronext Clearing and disseminated to its participants, shall be used to report records at trade level. The following table provides the business logic to generate the UTI code for a trade.

| Field name | Length | Description | BCS API Field |
|--------------|--------|---|--------------------------------|
| CCP LEI | 20 | This is a fixed value: "8156006407E264D2C725" | |
| Trade Date | 6 | Trade date in the format "YYMMDD" | NotifyContract/Contract Date |
| ISIN | 12 | ISIN Code of the traded product | NotifyContract/ISINCode |
| Trade number | 12 | Contract number, left padded with zeros | NotifyContract/Contract Number |
| Side | 2 | BU=Buy SE=Sell (from the Participant perspective) | NotifyContract/Side |

Trade UTI example:

- CCP LEI = 8156006407E264D2C725
- Trade date = 240603
- ISIN = IT0001112223
- Trade number = 123456789012
- Side = BU
- **Trade UTI:** 8156006407E264D2C725240603IT0001112223123456789012BU

¹ ESMA – [Final Report Guidelines for reporting under Emir](#) (14 December 2022)

2.2 UTI for positions

The following table provides the business logic to generate the UTI code for positions.

| Field name | Length | Description | BCS API Field |
|------------------|--------|---|-------------------------------|
| CCP LEI | 20 | This is a fixed value: "8156006407E264D2C725" | |
| Participant code | 5 | This is the 5 digits ABI code identifying the participant originating the trade. | NotifyPositions/Abicode |
| Account | 1 | Can be "H" for house accounts, or "C" for client accounts. | NotifyPositions / Accounttype |
| Sub-Account | 4 | Four chars subaccount code. The asterisk "*" in the omnibus account shall be replaced by the "X" (Eg. "XOMN"). Please notice that the API returns the code with the asterisk. | NotifyPositions / SubAccount |
| Separator | 10 | This field shall be populated with "0000000000" | |
| ISIN | 12 | ISIN Code of the traded product | NotifyPositions/ISINCode |

Position UTI example:

- CCP LEI = 8156006407E264D2C725
 - Participant code = 12345
 - Account = H
 - Sub - Account = XOMN
 - Separator = 0000000000
 - ISIN = ABCDEF123456
- Position UTI example =**
8156006407E264D2C72512345HXOMN0000000000ABCDEF123456

2.3 Identification of counterparties

Each reporting counterparty shall be identified by the ISO 17442 Legal Entity Identifier (LEI) registered and maintained in the GLEIF database. Participants shall promptly communicate to Euronext Clearing any change in the code used for their reporting.

Euronext Clearing is registered in the GLEIF database with the following code:

8156006407E264D2C725

3. TRADE DATA

This section refers to a selection of fields belonging to the table 1 – Trade Data. The following table indicates the rules used by Euronext Clearing to compile Trade Data report.

Table 1 – Trade Data

| ESMA reference number | ESMA field name | ESMA field description | Euronext Clearing Note | Sample |
|-----------------------|---|--|----------------------------------|----------------------|
| 1.1 | Reporting timestamp | Date and time of the submission of the report to the trade repository | | 2023-02-27T17:03:38Z |
| 1.2 | Report submitting entity ID | In the case where the entity responsible for reporting has delegated the submission of the report to a third party or to the other counterparty, this entity has to be identified in this field by a unique code. Otherwise, the entity responsible for reporting should be identified in this field | | 549300ABE4K96QOCEH37 |
| 1.4 | Counterparty 1 (Reporting counterparty) | Identifier of the counterparty to a derivative transaction who is fulfilling its reporting obligation via the report in question. In the case of an allocated derivative transaction executed by a fund manager on behalf of a fund, the fund and not the fund manager is reported as the counterparty | | 549300ABE4K96QOCEH37 |
| 1.5 | Nature of the counterparty 1 | Indicate if the counterparty 1 is a CCP, a Financial or a Non-Financial counterparty or other type of counterparty as defines in Article 2, points 1, 8 and 9, of Regulation (EU) No 648/2012, or an entity as referred to in Article 1, point 5, of that Regulation | F-FIXED | F |
| 1.6 | Corporate sector of the counterparty 1 | Nature of the counterparty 1's company activities. If the counterparty 1 is a Financial Counterparty, this field shall contain all necessary codes included in the Taxonomy for Financial Counterparties in field 6 of Table 1 of the Annex to [PO please insert reference to C(2022) 3588] and applying to that counterparty. If counterparty 1 is a Non-Financial counterparty, this field shall contain all necessary codes included in the Taxonomy for Non-Financial Counterparties in field 6 of Table 1 of the Annex to [PO please insert reference to C(2022) 3588] and applying to | List of sector order by priority | - CDTI - INV F |

| ESMA reference number | ESMA field name | ESMA field description | Euronext Clearing Note | Sample |
|-----------------------|--|--|--|--|
| | | that Counterparty. Where more than one activity is reported, the codes shall be populated in order of the relative importance of the corresponding activities | | |
| 1.9 | Counterparty 2 | Identifier of the second counterparty to a derivative transaction. In the case of an allocated derivative transaction executed by a fund manager on behalf of a fund, the fund and not the fund manager is reported as the counterparty | 8156006407E264D2C725-FIXED | 8156006407E264D2C725 |
| 1.11 | Nature of the counterparty 2 | Indicate if the counterparty 2 is a CCP, a Financial Counterparty or a Non-Financial counterparty as defined in Article 2, points 1, 8 and 9 of Regulation (EU) No 648/2012, or an entity as referred to in Article 1, point 5, of that Regulation | | C |
| 1.14 | Reporting obligation of the counterparty 2 | Indicator of whether counterparty 2 has the reporting obligation under Regulation (EU) No 648/2012, irrespective of who is responsible and legally liable for its reporting | True-FIXED | true |
| 1.16 | Clearing member | Identifier of the clearing member through which a derivative transaction was cleared at a CCP. This data element is applicable to cleared transactions | | 549300ABE4K96QOCEH37 |
| 1.17 | Direction | Indicator of whether counterparty 1 is the buyer or the seller as determined at the date the derivative was concluded | D01R-Buy/Sell | SLLR |
| 2.1 | UTI | Unique Trade Identifier as referred to in Article 7 of the [PO please insert reference to C(2022) 3588] | D01R-UTI | 8156006407E264D2C7252406031T0001112223123456789012BU |
| 2.2 | Report tracking number | Where a derivative was executed on a trading venue, a number generated by the trading venue and unique to that execution | D01R-Order Number IN UPPERCASE | N2P00004 |
| 2.4 | Subsequent position UTI | The UTI of the position in which a derivative is included. This field is applicable only for the reports related to the termination of a derivative due to its inclusion in a position | Refer to chapter 2.2 | 8156006407E264D2C72512345HXOMN0000000000ABCDEF123456 |
| 2.7 | ISIN | ISIN identifying the product if that product is admitted to trading or traded on a | D01R-ISIN Code | IT0019464871 |

| ESMA reference number | ESMA field name | ESMA field description | Euronext Clearing Note | Sample |
|-----------------------|-----------------------------------|--|---|--------------|
| | | Regulated Market (RM), Multilateral Trading Facility (MTF), Organised Trading Facility (OTF) or Systematic Internaliser (SI) | | |
| 2.9 | Product classification | Classification of Financial Instrument (CFI) code pertaining to the instrument | Ref. Public Data Services - report 'cficode' | FFICSX |
| 2.10 | Contract type | Each reported contract shall be classified according to its type | D01R-Type | FUTR |
| 2.11 | Asset class | Each reported contract shall be classified according to the asset class it is based on | EQUI-FIXED | EQUI |
| 2.12 | Derivative based on crypto-assets | Indicator whether the derivative is based on crypto-assets | FALSE-FIXED | false |
| 2.14 | Underlying identification | The direct underlying shall be identified by using a unique identification for this underlying based on its type. For Credit Default Swaps, the ISIN of the reference obligation should be provided | Ref. Public Data Services - report 'Class-file' <i>Underlying-Isin-Code</i> Using as key D01R-Symbol | GB00BNNLHW18 |
| 2.16 | Name of the underlying index | The full name of the underlying index as assigned by the index provider | Public Data Service - Report 'ClassFile' - field 'Underlying-ISIN-Code' using as key the Symbol field from D01R flow. Looking up the Underlying Index name from the mapping table into par. 7.4 using the discovered Underlying ISIN Code | FTSE MIB |
| 2.19 | Settlement currency 1 | Currency for the cash settlement of the transaction when applicable. For multicurrency products that do not net, the settlement currency of the leg 1. This data element is not applicable for physically settled products (e.g. physically settled swaptions) | This field shall be populated with 'EUR' (for the currently cleared products) | EUR |
| 2.27 | Collateral portfolio code | If collateral is reported on a portfolio basis, unique code assigned by counterparty 1 to the portfolio. This data element is not applicable if the collateralisation was performed on a transaction level basis, or if there is no collateral agreement or if no collateral is posted or received | D01R-Concatenation of General clearing member code, account (C=client or F=firm), trading client code and account (C=client or F=firm) | 3311C3311C |

| ESMA reference number | ESMA field name | ESMA field description | Euronext Clearing Note | Sample |
|-----------------------|-----------------------------|--|--|-----------------------|
| 2.32 | Clearing timestamp | Time and date when clearing took place. Applicable only to derivatives cleared by a CCP | Same as field 2.42 | 2023-02-24T07:00:07Z |
| 2.33 | Central counterparty | Identifier of the CCP that cleared the transaction. This data element is not applicable if the value of the data element 'Cleared' is 'N' ('No, not centrally cleared') | 8156006407E264D2C725-FIXED | 8156006407E264D2C725 |
| 2.34 | Master Agreement type | Reference to the master agreement type under which the counterparties concluded a derivative | OTHR-FIXED | OTHR |
| 2.35 | Other master agreement type | Name of the master agreement. This field shall only be completed where 'OTHR' is reported in field 34 in this table | CCPClearingConditions-FIXED | CCPClearingConditions |
| 2.38 | PTRR | Identify whether the contract results from a PTRR operation | False-FIXED | false |
| 2.41 | Venue of execution | Identification of the venue where the transaction was executed. Use the ISO 10383 segment MIC for transactions executed on a trading venue, Systematic Internaliser ('SI') or organised trading platform outside the Union. Where the segment MIC does not exist, use the operating MIC. Use MIC code 'XOFF' for financial instruments admitted to trading, or traded on a trading venue or for which a request for admission was made, where the transaction on that financial instrument is not executed on a trading venue, SI or organised trading platform outside the Union, or where a counterparty does not know it is trading with a counterparty 2 acting as an SI. Use MIC code 'XXXX' for financial instruments that are not admitted to trading or traded on a trading venue or for which no request for admission has been made and that are not traded on an organised trading platform outside the Union | XDMI-FIXED | XDMI |
| 2.42 | Execution timestamp | Date and time a transaction was originally executed, resulting in the generation of a new UTI. This data element remains unchanged throughout the life of the UTI. For position level reporting it should refer to the time when position was opened for the first time | D01R - 'Date' and 'Contract time' fields (<i>Contract time</i> is expressed in CET timezone) so to comply this regulation format it must be convert in UTC timezone | 2023-02-24T07:00:07Z |

| ESMA reference number | ESMA field name | ESMA field description | Euronext Clearing Note | Sample |
|-----------------------|-----------------------------------|--|---|--------------|
| 2.43 | Effective date | Unadjusted date at which obligations under the OTC derivative transaction come into effect, as included in the confirmation. If the effective date is not specified as part of the terms of the contract, the counterparties shall report in this field the date of execution of the derivative | D01R-Date | 2023-02-24 |
| 2.44 | Expiration date | Unadjusted date at which obligations under the derivative transaction stop being effective, as included in the confirmation. Early termination does not affect this data element | D01R-Expiry | 2023-03-17 |
| 2.46 | Final contractual settlement date | Unadjusted date as per the contract, by which all transfer of cash or assets should take place and the counterparties should no longer have any outstanding obligations to each other under that contract. For products that may not have a final contractual settlement date (e.g. American options), this data element reflects the date by which the transfer of cash or asset would take place if termination were to occur on the expiration date | D01R-Date | 2023-02-24 |
| 2.47 | Delivery type | Indicates whether the contract is settled physically or in cash | | PHYS / CASH |
| 2.48 | Price | Price specified in the derivative transaction. It does not include fees, taxes or commissions. Where the price is not known when a new transaction is reported, the price is updated as it becomes available. For transactions that are part of a package, this data element contains the price of the component transaction where applicable | D01R-Price | 27440.00000 |
| 2.49 | Price currency | Currency in which the price is denominated. Price currency is only applicable if price is expressed as monetary value | This field shall be populated with 'EUR' (for the currently cleared products) | EUR |
| 2.55 | Notional amount of leg 1 | Notional amount of leg 1 as referred to in Article 5 of this Regulation | Shall be populated with the notional amount which is different for futures and options: Futures: [multiplier] x [market price] x [quantity] Options: [multiplier] x [strike price] x [quantity] | 137200.00000 |

| ESMA reference number | ESMA field name | ESMA field description | Euronext Clearing Note | Sample |
|-----------------------|----------------------------------|---|---|------------|
| | | | (Market Price ref. Public Data Service - Report 'serinf' - field 'Mark Price'). | |
| 2.56 | Notional currency 1 | Where applicable: the currency in which the notional amount of leg 1 is denominated | This field shall be populated with 'EUR' (for the currently cleared products) | EUR |
| 2.60 | Total notional quantity of leg 1 | Aggregate Notional quantity of the underlying asset of leg 1 for the term of the transaction. Where the total notional quantity is not known when a new transaction is reported, the total notional quantity is updated as it becomes available | D01R-Quantity x D01R-Multiplier | 1.00000 |
| 2.151 | Action type | <ul style="list-style-type: none"> • New: A report of a derivative, at a trade or position level, for the first time. • Modify: A modification to the terms or details of a previously reported derivative, at a trade or position level, but not a correction of a report. • Correct: A report correcting the erroneous data fields of a previously submitted report. • Terminate: A termination of an existing derivative, at a trade or position level. • Error: A cancellation of a wrongly submitted entire report in case the derivative, at a trade or position level, never came into existence or was not subject to Regulation (EU) No 648/2012 reporting requirements but was reported to a trade repository by mistake or a cancellation of a duplicate report. • Revive: Re-opening of a derivative, at a trade or position level, that was cancelled with action type 'Error' or terminated by mistake. • Valuation: An update of a valuation of a derivative, at a trade or position level • Position component: A report of a new derivative that is included in a separate position report on the same day | POSC-FIXED | POSC |
| 2.153 | Event date | Date on which the reportable event relating to the derivative contract and captured by the report took place or, in case of a modification when the modification become effective | D01R-Date | 2023-02-24 |

| ESMA reference number | ESMA field name | ESMA field description | Euronext Clearing Note | Sample |
|-----------------------|-----------------|---|------------------------|--------|
| 2.154 | Level | Indication whether the report is done at trade or position level. Position level report can be used only as a supplement to trade level reporting to report post-trade events and only if individual trades in fungible products have been replaced by the position | TCTN-FIXED | TCTN |

4. POSITION DATA

This section refers to a selection of fields belonging to the table 2 – Position Data. The following table indicates the rules used by Euronext Clearing to compile Position Data report.

Table 2 – Position Data

| ESMA reference number | ESMA field name | ESMA field description | Euronext Clearing Note | Sample |
|-----------------------|---|---|------------------------|----------------------|
| 1.1 | Reporting timestamp | Date and time of the submission of the report to the trade repository | | 2023-03-01T23:30:00Z |
| 1.2 | Report submitting entity ID | In the case where the entity responsible for reporting has delegated the submission of the report to a third party or to the other counterparty, this entity has to be identified in this field by a unique code. Otherwise, the entity responsible for reporting should be identified in this field | | 2W8N8UU78PMDQKZENC08 |
| 1.4 | Counterparty 1 (Reporting counterparty) | Identifier of the counterparty to a derivative transaction who is fulfilling its reporting obligation via the report in question. In the case of an allocated derivative transaction executed by a fund manager on behalf of a fund, the fund and not the fund manager is reported as the counterparty | | 2W8N8UU78PMDQKZENC08 |
| 1.5 | Nature of the counterparty 1 | Indicate if the counterparty 1 is a CCP, a Financial or a Non-Financial counterparty or other type of counterparty as defines in Article 2, points 1, 8 and 9, of Regulation (EU) No 648/2012, or an entity as referred to in Article 1, point 5, of that Regulation | | F |
| 1.9 | Counterparty 2 | Identifier of the second counterparty to a derivative transaction. In the case of an allocated derivative transaction executed by a fund manager on behalf of a fund, the fund and not the fund manager is reported as the counterparty | | 8156006407E264D2C725 |
| 1.11 | Nature of the counterparty 2 | Indicate if the counterparty 2 is a CCP, a Financial Counterparty or a Non-Financial counterparty as defined in Article 2, points 1, 8 and 9 of Regulation (EU) No 648/2012, or an entity as referred to in Article 1, point 5, of that Regulation | FIXED-C | C |

| ESMA reference number | ESMA field name | ESMA field description | Euronext Clearing Note | Sample |
|-----------------------|--|--|--|---|
| 1.14 | Reporting obligation of the counterparty 2 | Indicator of whether counterparty 2 has the reporting obligation under Regulation (EU) No 648/2012, irrespective of who is responsible and legally liable for its reporting | | true |
| 1.16 | Clearing member | Identifier of the clearing member through which a derivative transaction was cleared at a CCP. This data element is applicable to cleared transactions | | 2W8N8UU78PMDQKZENC08 |
| 1.17 | Direction | Indicator of whether counterparty 1 is the buyer or the seller as determined at the date the derivative was concluded | | BYER |
| 2.1 | UTI | Unique Trade Identifier as referred to in Article 7 of the [PO please insert reference to C(2022) 3588] | D13R- <i>UTI</i> | 8156006407E264D2C72512345H MN0000000000ABCDEF12345 |
| 2.7 | ISIN | ISIN identifying the product if that product is admitted to trading or traded on a Regulated Market (RM), Multilateral Trading Facility (MTF), Organised Trading Facility (OTF) or Systematic Internaliser (SI) | D13R- <i>ISIN Code</i> | IT0019464871 |
| 2.9 | Product classification | Classification of Financial Instrument (CFI) code pertaining to the instrument | Look up the CFI code on cfi code.txt/.xml on Risk Array (using ISIN code as key) | OPASPS |
| 2.10 | Contract type | Each reported contract shall be classified according to its type | D13R- <i>Product type</i> | OPTN |
| 2.11 | Asset class | Each reported contract shall be classified according to the asset class it is based on | | EQUI |
| 2.12 | Derivative based on crypto-assets | Indicator whether the derivative is based on crypto-assets | | false |
| 2.14 | Underlying identification | The direct underlying shall be identified by using a unique identification for this underlying based on its type. For Credit Default Swaps, the ISIN of the reference obligation should be provided | | IT0003492391 |
| 2.19 | Settlement currency 1 | Currency for the cash settlement of the transaction when applicable. For multicurrency products that do not net, the settlement currency of the leg 1. This data element is not applicable for physically settled products | | EUR |

| ESMA reference number | ESMA field name | ESMA field description | Euronext Clearing Note | Sample |
|-----------------------|-----------------------------|--|---|-----------------------|
| | | (e.g. physically settled swaptions) | | |
| 2.27 | Collateral portfolio code | If collateral is reported on a portfolio basis, unique code assigned by counterparty 1 to the portfolio. This data element is not applicable if the collateralisation was performed on a transaction level basis, or if there is no collateral agreement or if no collateral is posted or received | D13R- Concatenation of General clearing member code, account (C=client or F=firm), trading client code and account (C=client or F=firm) | 3069C1106C |
| 2.32 | Clearing timestamp | Time and date when clearing took place. Applicable only to derivatives cleared by a CCP | Hours always 23:00:00 CET | 2023-03-01T23:00:00Z |
| 2.33 | Central counterparty | Identifier of the CCP that cleared the transaction. This data element is not applicable if the value of the data element 'Cleared' is 'N' ('No, not centrally cleared') | | 8156006407E264D2C725 |
| 2.34 | Master Agreement type | Reference to the master agreement type under which the counterparties concluded a derivative | | OTHR |
| 2.35 | Other master agreement type | Name of the master agreement. This field shall only be completed where 'OTHR' is reported in field 34 in this table | | CCPClearingConditions |
| 2.41 | Venue of execution | Identification of the venue where the transaction was executed. Use the ISO 10383 segment MIC for transactions executed on a trading venue, Systematic Internaliser ('SI') or organised trading platform outside the Union. Where the segment MIC does not exist, use the operating MIC. Use MIC code 'XOFF' for financial instruments admitted to trading, or traded on a trading venue or for which a request for admission was made, where the transaction on that financial instrument is not executed on a trading venue, SI or organised trading platform outside the Union, or where a counterparty does not know it is trading with a counterparty 2 acting as an SI. Use MIC code 'XXXX' for financial instruments that are not admitted to trading or traded on a trading venue or for which no request for admission has been made and that are not traded on an organised trading platform outside the Union | | XDMI |

| ESMA reference number | ESMA field name | ESMA field description | Euronext Clearing Note | Sample |
|-----------------------|-----------------------------------|---|---|----------------------|
| 2.42 | Execution timestamp | Date and time a transaction was originally executed, resulting in the generation of a new UTI. This data element remains unchanged throughout the life of the UTI. For position level reporting it should refer to the time when position was opened for the first time | Hours always 23:00:00 CET | 2023-03-01T23:00:00Z |
| 2.43 | Effective date | Unadjusted date at which obligations under the OTC derivative transaction come into effect, as included in the confirmation. If the effective date is not specified as part of the terms of the contract, the counterparties shall report in this field the date of execution of the derivative | | 2023-03-01 |
| 2.44 | Expiration date | Unadjusted date at which obligations under the derivative transaction stop being effective, as included in the confirmation. Early termination does not affect this data element | D13R-Expiry | 2023-03-17 |
| 2.46 | Final contractual settlement date | Unadjusted date as per the contract, by which all transfer of cash or assets should take place and the counterparties should no longer have any outstanding obligations to each other under that contract. For products that may not have a final contractual settlement date (e.g., American options), this data element reflects the date by which the transfer of cash or asset would take place if termination were to occur on the expiration date | It is DP13R-Expiry + 1D for instruments with Delivery Type = CASH, whereas it is DP13R-Expiry + 2D for instruments with Delivery Type = PHYS For all the instruments exercised or assigned before the maturity date, the general rule is DP13R-Expiry + 2D | 2023-03-17 |
| 2.47 | Delivery type | Indicates whether the contract is settled physically or in cash | | PHYS |
| 2.55 | Notional amount of leg 1 | Notional amount of leg 1 as referred to in Article 5 of this Regulation | Shall be populated with the notional amount which is different for futures and options: Futures: [multiplier] x [market price] x [quantity] Options: [multiplier] x | 11000.00000 |

| ESMA reference number | ESMA field name | ESMA field description | Euronext Clearing Note | Sample |
|-----------------------|----------------------------------|--|---|---------|
| | | | [strike price] x [quantity] (Market Price ref. Public Data Service - Report 'serinf' - field 'Mark Price'). | |
| 2.56 | Notional currency 1 | Where applicable: the currency in which the notional amount of leg 1 is denominated | | EUR |
| 2.60 | Total notional quantity of leg 1 | Aggregate Notional quantity of the underlying asset of leg 1 for the term of the transaction. Where the total notional quantity is not known when a new transaction is reported, the total notional quantity is updated as it becomes available | D13R-Quantity x D13R-Multiplier | 1.00000 |
| 2.132 | Option type | Indication as to whether the derivative contract is a call (right to purchase a specific underlying asset) or a put (right to sell a specific underlying asset) or whether it cannot be determined whether it is a call or a put at the time of execution of the derivative contract. In case of swaptions it shall be: - 'Put', in case of receiver swaption, in which the buyer has the right to enter into a swap as a fixed-rate receiver. - 'Call', in case of payer swaption, in which the buyer has the right to enter into a swap as a fixed-rate payer. In case of Caps and Floors it shall be: - 'Put', in case of a Floor. - 'Call', in case of a Cap | D13R-Option type | PUTO |
| 2.133 | Option style | Indicates whether the option may be exercised only at a fixed date (European), a series of pre-specified dates (Bermudan) or at any time during the life of the contract (American) | | AMER |
| 2.134 | Strike price | <ul style="list-style-type: none"> For options other than FX options, swaptions and similar products, price at which the owner of an option can buy or sell the underlying asset of the option. For foreign exchange options, exchange rate at which the option can be exercised, expressed as the rate of exchange from converting the unit currency | 110.00000 | |

| ESMA reference number | ESMA field name | ESMA field description | Euronext Clearing Note | Sample |
|-----------------------|-------------------------------------|--|---|------------|
| | | <p>into the quoted currency. In the example 0.9426 USD/EUR, USD is the unit currency and EUR is the quoted currency; USD 1 = EUR 0.9426.</p> <p>Where the strike price is not known when a new transaction is reported, the strike price is updated as it becomes available.</p> <ul style="list-style-type: none"> For volatility and variance swaps and similar products the volatility strike price is reported in this data element | | |
| 2.138 | Strike price currency/currency pair | <p>For equity options, commodity options, and similar products, currency in which the strike price is denominated. For foreign exchange options: Currency pair and order in which the strike price is expressed. It is expressed as unit currency per quoted currency</p> | | EUR |
| 2.139 | Option premium amount | <p>For options and swaptions of all asset classes, monetary amount paid by the option buyer. This data element is not applicable if the instrument is not an option or does not embed any optionality</p> | <p>Always 0 at Positions Level, while at Trade Level the Fields is calculated as:</p> $(\text{Multiplier}) \times (\text{Net Quantity}) \times (\text{Settlement Price})$ | 249.38000 |
| 2.140 | Option premium currency | <p>For options and swaptions of all asset classes, currency in which the option premium amount is denominated. This data element is not applicable if the instrument is not an option or does not embed any optionality</p> | | EUR |
| 2.141 | Option premium payment date | <p>Unadjusted date on which the option premium is paid</p> | | 2023-03-01 |
| 2.152 | Event type | <ul style="list-style-type: none"> Trade: Conclusion of a derivative or renegotiation of its terms that does not result in change of a counterparty Step-in: An event, where part or entirety of the derivative is transferred to a counterparty 2 (and reported as a new derivative) and the existing derivative is either terminated or its notional is modified PTRR: Post-trade risk reduction exercise | | INCP |

| ESMA reference number | ESMA field name | ESMA field description | Euronext Clearing Note | Sample |
|-----------------------|-----------------|--|------------------------|------------|
| | | <ul style="list-style-type: none"> • Early termination: Termination of a derivative, at a trade or position level • Clearing: Clearing as defined in Article 2-point (3) of Regulation (EU) No 648/2012 • Exercise: The exercise of an option or a swaption by one counterparty of the transaction, fully or partially • Allocation: Allocation event, where an existing derivative is allocated to different counterparties and reported as new derivatives with reduced notional amounts. • Credit event: Applies only to credit derivatives. A credit event that results in a modification of a derivative, at a trade or position level Corporate event: A corporate action on equity underlying that impacts the derivatives on that equity • Inclusion in position: Inclusion of CCP-cleared derivative or CFD into a position, where an existing derivative is terminated and either a new position is created or the notional of an existing position is modified. Update - Update of an outstanding derivative performed during the transition period to ensure its conformity with the amended reporting requirements | | |
| 2.153 | Event date | Date on which the reportable event relating to the derivative contract and captured by the report took place or, in case of a modification when the modification become effective | | 2023-03-01 |
| 2.154 | Level | Indication whether the report is done at trade or position level. Position level report can be used only as a supplement to trade level reporting to report post-trade events and only if individual trades in fungible products have been replaced by the position | | PSTN |

5. VALUATION DATA

This section refers to a selection of fields belonging to the table 3 – Valuation Data. The following table indicates the rules used by Euronext Clearing to compile Valuation Data report.

Table 3 – Valuation Data

| ESMA reference number | ESMA field name | ESMA field description | Euronext Clearing Note | Sample |
|-----------------------|---|--|--|----------------------|
| 1.1 | Reporting timestamp | Date and time of the submission of the report to the trade repository | | 2023-02-27T17:12:13Z |
| 1.2 | Report submitting entity ID | In the case where the entity responsible for reporting has delegated the submission of the report to a third party or to the other counterparty, this entity has to be identified in this field by a unique code. Otherwise the entity responsible for reporting should be identified in this field | | PSNL19R2RXX5U3QWHI44 |
| 1.4 | Counterparty 1 (Reporting counterparty) | Identifier of the counterparty to a derivative transaction who is fulfilling its reporting obligation via the report in question. In the case of an allocated derivative transaction executed by a fund manager on behalf of a fund, the fund and not the fund manager is reported as the counterparty. | | PSNL19R2RXX5U3QWHI44 |
| 1.9 | Counterparty 2 | Identifier of the second counterparty to a derivative transaction. In the case of an allocated derivative transaction executed by a fund manager on behalf of a fund, the fund and not the fund manager is reported as the counterparty | | 8156006407E264D2C725 |
| 2.1 | UTI | Unique Trade Identifier as referred to in Article 7 of the [PO please insert reference to C(2022) 3588] | D13R- <i>UTI</i> | |
| | | | D13R- <i>Settlement Price</i> | |
| 2.21 | Valuation amount | Mark-to-market valuation of the contract, or mark-to-model valuation as referred to in Article 4 of this Regulation. The CCP's valuation to be used for a cleared trade | x D13R- <i>Multiplier</i> x | -50255.00000 |
| | | | D13R-(<i>Short Position – Long Position</i>) | |
| 2.22 | Valuation currency | Currency in which the valuation amount is denominated | | EUR |

| ESMA reference number | ESMA field name | ESMA field description | Euronext Clearing Note | Sample |
|-----------------------|---------------------------|--|---|----------------------|
| 2.23 | Valuation timestamp | Date and time of the last valuation marked to market, provided by the CCP or calculated using the current or last available market price of the inputs | Hours always 23:00:00 CET | 2023-02-24T23:00:00Z |
| 2.24 | Valuation method | Source and method used for the valuation of the transaction by counterparty 1. If at least one valuation input is used that is classified as mark-to-model, then the whole valuation is classified as mark-to-model. If only inputs are used that are classified as mark-to-market, then the whole valuation is classified as mark-to-market | | CCPV |
| 2.25 | Delta | The ratio of the change in the price of a derivative transaction to the change in the price of the underlying. This field is applicable only to options and swaptions. Updated delta shall be reported on a daily basis by Financial counterparties and Non-Financial counterparties as referred to in Article 10 of Regulation (EU) No 648/2012 | Refer to paragraph 7.1 | -0.06560 |
| 2.27 | Collateral portfolio code | If collateral is reported on a portfolio basis, unique code assigned by counterparty 1 to the portfolio. This data element is not applicable if the collateralisation was performed on a transaction level basis, or if there is no collateral agreement or if no collateral is posted or received | D13R- Concatenation of General clearing member code, account(C=client or F=firm), trading client code and account(C=client or F=firm) | 0631F0631F |
| 2.38 | PTRR | Identify whether the contract results from a PTRR operation | | False |
| 2.153 | Event date | Date on which the reportable event relating to the derivative contract and captured by the report took place or, in case of a modification when the modification become effective | | 2023-02-24 |
| 2.154 | Level | Indication whether the report is done at trade or position level. Position level report can be used only as a supplement to trade level reporting to report post-trade events and only if individual trades in fungible products have been replaced by the position | | PSTN |

6. MARGIN DATA

This section refers to a selection of fields belonging to the table 4 – Margin Data. The following table indicates the rules used by Euronext Clearing to compile Margin Data report.

Table 4 – Margin Data

| ESMA reference number | ESMA field name | ESMA field description | Euronext Clearing Note | Sample |
|-----------------------|---|--|------------------------|----------------------|
| 3.1 | Reporting timestamp | Date and time of the submission of the report to the trade repository | | 2023-02-27T17:14:52Z |
| 3.2 | Report submitting entity ID | In the case where the entity responsible for reporting has delegated the submission of the report to a third party or to the other counterparty, this entity has to be identified in this field by a unique code. Otherwise the entity responsible for reporting should be identified in this field | | 549300FH0WJAPEHTIQ77 |
| 3.4 | Counterparty 1 (Reporting counterparty) | Identifier of the counterparty to a derivative transaction who is fulfilling its reporting obligation via the report in question. In the case of an allocated derivative transaction executed by a fund manager on behalf of a fund, the fund and not the fund manager is reported as the counterparty | | 549300FH0WJAPEHTIQ77 |
| 3.6 | Counterparty 2 | Identifier of the second counterparty to a derivative transaction. In the case of an allocated derivative transaction executed by a fund manager on behalf of a fund, the fund and not the fund manager is reported as the counterparty | | 8156006407E264D2C725 |
| 3.7 | Collateral timestamp | Date and time as of which the values of the margins are reported | | 2023-02-24T23:00:00Z |
| 3.9 | Collateral portfolio code | If collateral is reported on a portfolio basis, unique code assigned by counterparty 1 to the portfolio. This data element is not applicable if the collateralisation was performed on a transaction level basis, or if there is no collateral agreement or if no collateral is posted or received | | 8069F8069F |

| ESMA reference number | ESMA field name | ESMA field description | Euronext Clearing Note | Sample |
|-----------------------|--|---|---|----------------|
| 3.11 | Collateralisation category | Indicate whether a collateral agreement between the counterparties exists. This data element is provided for each transaction or each portfolio, depending on whether the collateralisation is performed at the transaction or portfolio level, and is applicable to both cleared and uncleared transactions | | OWP1 |
| 3.12 | Initial margin posted by the counterparty 1 (pre-haircut) | Monetary value of initial margin that has been posted by counterparty 1, including any margin that is in transit and pending settlement. If the collateralisation is performed at portfolio level, the initial margin posted relates to the whole portfolio; if the collateralisation is performed for single transactions, the initial margin posted relates to such single transaction. This field refers to the total current value of the initial margin, rather than to its daily change. The data element refers both to uncleared and centrally cleared transactions. For centrally cleared transactions, the data element does not include default fund contributions, nor collateral posted against liquidity provisions to the CCP, i.e. committed credit lines. If the initial margin posted is denominated in more than one currency, those amounts are converted into a single currency chosen by counterparty 1 and reported as one total value | D03A (SUM (Guarantee value / Haircut Applied for each row where deposit type not in ('BD'))), So Exclude Bulk Deposit | 35613088.68000 |
| 3.13 | Initial margin posted by the counterparty 1 (post-haircut) | Monetary value of initial margin that has been posted by counterparty 1, including any margin that is in transit and pending settlement. If the collateralisation is performed at portfolio level, the initial margin posted relates to the whole portfolio; if the collateralisation is performed for single transactions, the initial margin posted relates to such single transaction. This field refers to the total | D03A (SUM (Guarantee value for each row where deposit type not in ('BD'))), So Exclude Bulk Deposit | 35613088.68000 |

| ESMA reference number | ESMA field name | ESMA field description | Euronext Clearing Note | Sample |
|-----------------------|---|---|--|--------------|
| | | current value of the initial margin after application of the haircut (if applicable), rather than to its daily change. The data element refers both to uncleared and centrally cleared transactions. For centrally cleared transactions, the data element does not include default fund contributions, nor collateral posted against liquidity provisions to the CCP, i.e. committed credit lines. If the initial margin posted is denominated in more than one currency, those amounts are converted into a single currency chosen by counterparty 1 and reported as one total value | | |
| 3.14 | Currency of the initial margin posted | Currency in which the initial margin posted is denominated. If the initial margin posted is denominated in more than one currency, this data element reflects one of those currencies into which counterparty 1 has chosen to convert all the values of posted initial margins | | EUR |
| 3.15 | Variation margin posted by the counterparty 1 (pre-haircut) | Value of the variation margin posted by counterparty 1, including the cash-settled margin and any margin that is in transit and pending settlement. Contingent variation margin is not included. If the collateralisation is performed at portfolio level, the variation margin posted relates to the whole portfolio; if the collateralisation is performed for single transactions, the variation margin posted relates to such single transaction. This field refers to the total current value of the variation margin, cumulated since the first reporting of variation margins posted for the portfolio or transaction. If the variation margin posted is denominated in more than one currency, those amounts are converted into a single currency chosen by | Populate only if (DS07.Future variation margins + Option variation margins) is negative -> Please consider the signs of Future variation margins and Option variation margins are distinct fields so the sum must be taken into consideration. | 122605.00000 |

| ESMA reference number | ESMA field name | ESMA field description | Euronext Clearing Note | Sample |
|-----------------------|--|---|--|--------------|
| | | counterparty 1 and reported as one total value | | |
| 3.16 | Variation margin posted by the counterparty 1 (post-haircut) | Monetary value of the variation margin posted by counterparty 1, including the cash-settled margin and any margin that is in transit and pending settlement. Contingent variation margin is not included. If the collateralisation is performed at portfolio level, the variation margin posted relates to the whole portfolio; if the collateralisation is performed for single transactions, the variation margin posted relates to such single transaction. This field refers to the total current value of the variation margin after application of the haircut, if applicable, cumulated since the first reporting of posted variation margins for the portfolio or transaction. If the variation margin posted is denominated in more than one currency, those amounts are converted into a single currency chosen by counterparty 1 and reported as one total value | Populate only if (DS07.Future variation margins + Option variation margins) is negative -> Please consider the signs of Future variation margins and Option variation margins are distinct fields so the sum must be taken into consideration. | 122605.00000 |
| 3.17 | Currency of the variation margins posted | Currency in which the variation margin posted is denominated. If the variation margin posted is denominated in more than one currency, this data element reflects one of those currencies into which counterparty 1 has chosen to convert all the values of posted variation margins | | EUR |
| 3.18 | Excess collateral posted by the counterparty 1 | Monetary value of any additional collateral posted by counterparty 1 separate and independent from initial and variation margin. This field refers to the total current value of the excess collateral before application of the haircut, if applicable, rather than to its daily change. Any initial or variation margin amount posted that exceeds the required initial margin or required variation margin, is | Flow (DS07-Excess coll. guarant. + Excess cash) | 0.00000 |

| ESMA reference number | ESMA field name | ESMA field description | Euronext Clearing Note | Sample |
|-----------------------|---|---|--|--------------|
| | | reported as part of the initial margin posted or variation margin posted respectively rather than included as excess collateral posted. For centrally cleared transactions, excess collateral is reported only to the extent it can be assigned to a specific portfolio or transaction | | |
| 3.19 | Currency of the excess collateral posted | Currency in which the excess collateral posted is denominated. If the excess collateral posted is denominated in more than one currency, this data element reflects one of those currencies into which counterparty 1 has chosen to convert all the values of posted excess collateral | | EUR |
| 3.23 | Variation margin collected by the counterparty 1 (pre-haircut) | Monetary value of the variation margin collected by counterparty 1, including the cash-settled margin and any margin that is in transit and pending settlement. Contingent variation margin is not included. If the collateralisation is performed at portfolio level, the variation margin collected relates to the whole portfolio; if the collateralisation is performed for single transactions, the variation margin collected relates to such single transaction. This field refers to the total current value of the variation margin, cumulated since the first reporting of collected variation margins for the portfolio/transaction. If the variation margin collected is denominated in more than one currency, those amounts are converted into a single currency chosen by counterparty 1 and reported as one total value | Populate only if (DS07.Future variation margins + Option variation margins) is positive - > Please consider the signs of Future variation margins and Option variation margins are distinct fields so the sum must be taken into consideration | 122605.00000 |
| 3.24 | Variation margin collected by the counterparty 1 (post-haircut) | Monetary value of the variation margin collected by counterparty 1, including the cash-settled margin, and any margin that is in transit and pending settlement. Contingent variation margin is not included. If the | Populate only if (DS07.Future variation margins + Option variation margins) is positive - > Please consider the signs of Future variation margins and Option variation margins are | 122605.00000 |

| ESMA reference number | ESMA field name | ESMA field description | Euronext Clearing Note | Sample |
|-----------------------|--|---|--|------------|
| | | collateralisation is performed at portfolio level, the variation margin collected relates to the whole portfolio; if the collateralisation is performed for single transactions, the variation margin collected relates to such single transaction. This field refers to the total current value of the variation margin collected after application of the haircut, if applicable, cumulated since the first reporting of collected variation margins for the portfolio/transaction. If the variation margin collected is denominated in more than one currency, those amounts are converted into a single currency chosen by counterparty 1 and reported as one total value | distinct fields so the sum must be taken into consideration. | |
| 3.25 | Currency of variation margin collected | Currency in which the variation margin collected is denominated. If the variation margin collected is denominated in more than one currency, this data element reflects one of those currencies into which counterparty 1 has chosen to convert all the values of collected variation margins | | EUR |
| 3.28 | Action type | The report shall contain one of the following action types: (a) a new margin balance or a modification of the details of the margins shall be identified as 'Margin update'; (b) a correction of data fields that were submitted incorrectly in a previous report shall be identified as 'Correct' | | MARU |
| 3.29 | Event date | Date on which the reportable event relating to the derivative contract and captured by the report took place. In the case of collateral update - the date for which the information contained in the report is provided | | 2023-02-24 |

7. FOCUS ON MAIN UPDATES

The published guidelines define the addition of a new field and the revision of existing fields following new regulation as described below:

- Delta
- Reporting Net Zero Position
- Adjustment Effective Date

7.1 Delta

The delta represents the first derivative of the price of a derivative instrument with respect to the price of the underlying asset ([Delta - Glossario Finanziario - Borsa Italiana](#)). Using the fields Market price of SERINF.xml files (risk array package) of T and T-1. If Delta calculated is out of the range (-1 and +1) then use +1 for CALL and -1 for PUT.

7.2 Reporting Net Zero Position

In line with paragraph 142 of ESMA² Final report Guideline, stating that once a position becomes zero, the counterparties can report in **one** of the following ways:

- Termination of the position and, if new trades are concluded at a later stage, reporting of a new position using a different UTI.
- Maintaining the position open and reporting a zero contract value on a daily basis

Euronext Clearing according to other CCPs of EACH EMIR working group the scenario B will follow.

7.3 Best Practice for reporting of various timestamps

- 2.23 Valuation timestamp - default to '23:00:00' CET
- 2.32 Clearing timestamp – should match Execution timestamp @ position level
- 2.42 Execution timestamp - Execution timestamp at position level should be the execution time of the earliest trade that forms part of the position. Available within CCP Harmonised File. For outstanding positions, post go-live, a default value will be populated
- 3.7 Collateral timestamp – default to '23:00:00' CET

7.4 Name of the underlying index

The full name of the underlying index as assigned by the index provider managed by Borsa Italiana on IDEM market are:

| ISIN | ESMA field name (2.16) |
|------|------------------------|
|------|------------------------|

² ESMA – Final Report Guidelines for reporting under Emir (14 December 2022)

| | |
|--------------|------------------------------|
| GB00BNNLJT29 | FTSE MIB DIVIDEND |
| GB00BNDQQP21 | FTSE ITALIA PIR MID SMAL CAP |
| GB00BNNLHW18 | FTSE MIB |
| GB00BNNLJJ21 | FTSE ITALIA PIR PMI |

8. CENTRALIZED REPORTING

With the entry into force of EMIR Refit, which will apply from 29th April 2024, ESMA has encouraged centralised reporting by CCPs for ETD products. Clients may delegate reporting to the CCP, through contractual obligations, but the regulatory responsibility will remain with original counterparties.

Euronext Clearing will offer one types of reporting service:

- Assisted reporting

8.1 Assisted Reporting

- The report will be produced by Euronext Clearing
- The submission to the Trade Repository will be made by the clients
- Clients will have to pay fees to Euronext Clearing for the report production service

