User Guide

COMMODITY DERIVATIVES POSITION REPORTING MANUAL

Issue 4.1 **|** 14 OCTOBER 2019
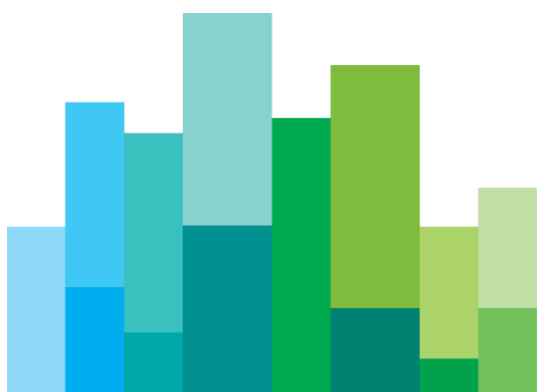
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1.INTRODUCTION

1.1 Introduction

MiFID II (Art. 57 and 58) introduces restrictions on commodity derivatives positions (position limits) and positions management as well as position reporting obligations.
R. (EU) 591/2017 (RTS 21) defines the regulatory technical standards for the application of position limits to commodity derivatives.
R. (EU) 1093/2017 (ITS 4) and R. (EU) 953/2017 (ITS 5) define the implementing technical standards with regard to the format and timing of position reports.
The purpose of this document ("Commodity Derivatives Position Reporting Manual", "Manuale del *reporting* delle posizioni in derivati su merci") is to provide the guidelines and the technical specifications for the position reporting on commodity derivatives on the markets organized and managed by Borsa Italiana (as requested by article 3.3.1 of Borsa Italiana regulated market rulebook and Rule 1400.6 of SeDeX rulebook).

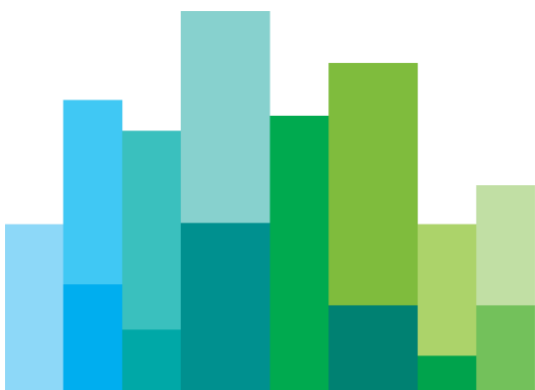Position reporting will be managed by Participants through a dedicated area of the Member Portal.

The rest of this document is organized as follows:
- Paragraphs 2 and 3 introduce definitions and the scope of this document
- Paragraphs 4 clarifies the main assumptions concerning the Position Reporting activity
- Paragraphs 5 provide further remarks on the Position Report content
- Paragraph 6 and Annex I provide a detailed and technical description of the reporting process and of the file format specifications of the required reports

Please note that:

- this document is not intended to provide advice on the application of MiFID II requirements

- this document may be subject to further reviews and amendments

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2. ACRONYMS AND DEFINITIONS

2.1 Acronyms and Definitions

Relevant Markets/Segments	Acronym or phrase	Description
ALL	TV	The following trading venues belonging to Borsa Italiana Group: 'XDMI' = IDEM (IDEX and AGREX segments) 'SEDX' = SeDeX
ALL	Participants	Firms that are participants of the above TV
SeDeX	SD	Securitized derivatives (listed on SeDeX market)
SeDeX	Commodity tags	Two Tags aiming at identifying SD on commodities and SD subject to position reporting provisions. Available in the MIT305 file
IDEX and AGREX	Reporting LOTS	IDEX: derivatives LOTS calculated as follows: position in MWh/ 720 for baseload futures; position in MWh / 264 for peakload futures AGREX: derivatives LOTS calculated as follows: position in MT / 50
IDEX and AGREX	Exchange LOTS	Unit of trading on IDEX and AGREX segments. For AGREX segment, the Exchange LOTS are the same as Reporting LOTS
IDEX and AGREX	Spoth month	IDEX futures: the first tradable expiry of the monthly future of each product area (i.e. Italian power) and load profile (i.e. baseload or peakload) AGREX futures: the first tradable expiry SD: not applicable
ALL	Positions Report	The daily positions report Participants are required to submit to TV
ALL	Clients Mapping Report	Report required to map Position Holder IDs into the five categories of position holders as per ESMA ITS4
ALL	Member Portal	Web portal used for the Position Reporting activity\
-	NCA	National Competent Authority
ALL	NATIONAL_ID	The "NATIONAL_ID" mentioned in this document is the national client identifier set out in Article 6 and ANNEX II of RTS 22 on transaction reporting obligations. Example: concatenation of the two letter country code (e.g. "IT") followed by the national identifier (e.g. "Fiscal Code").

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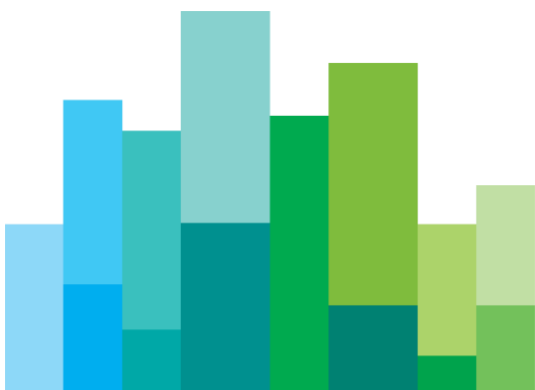
3. SCOPE

3.1 Scope

The following products traded on LSEG trading venues are assumed to be in scope for position limits and position reporting regime:
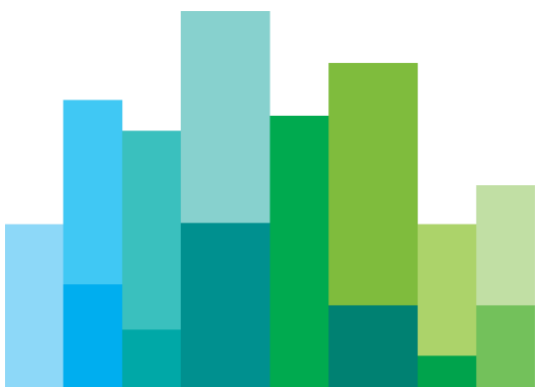
- Borsa Italiana markets:
    - o Derivatives traded on IDEX and AGREX segments of the IDEM Market
    - o Commodity SD traded on SeDeX market

This document covers the following reporting obligations for market Participants:

- Daily positions reporting
- Reporting of position holders' categories (Clients Mapping Report)

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4. ASSUMPTIONS

4.1 Assumptions

The following assumptions are made for the rest of the document:

Position Report:

- The daily Position Report submitted by Participants must be detailed at individual owner level, until the end client is reached.

- Participants are required to report to each TV the net positions constituted on that TV. In case of products traded on multiple TVs, Participants are required to provide each TV with the net positions respectively held by the position owner only on that TV.

- The position reporting obligation starts from the day of listing of the instrument on the TV, including any offering sales periods executed on the market (OPV).

- Participants shall submit the Position Report to the TV by 15:00 CET on T+1. **Any Report submitted after 15:00 CET (T+1) will be processed on the following day (T+2).**

Clients Mapping:

- Participants are required to submit to each TV a clients' mapping of the position holders divided among the following categories, as further detailed in this document:
  - o Investment Firms or credit institutions
  - o Investment Funds
  - o Other Financial Institutions
  - o Commercial Undertakings
  - o Operators with compliance obligations under Directive 2003/87/EC

- Position Holders present in the Position Report shall be promptly and appropriately mapped in the Clients Mapping Report.

Securitised Derivatives:

- Positions on SD will be reported in number of instruments. "Delta equivalent position quantity" is not applicable to SD products.

- The concept of deliverable supply is not applicable to SD products.

- According to ESMA Q&A issued on 7 July 2017, NCA do not need to require the submission of daily position reports for SD with a total number of securities in issue not exceeding 2.5 million[1].

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[1] According to ESMA Q/A no. 9 on MIFID II and MIFIR commodities derivatives topics – Position reporting section.

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- According to ESMA Q&A n° 10, issued on 27 March 2018, position limits shall be applied to SD relating to:
    - o indices if the underlying index is materially based on commodity underlings as defined in Article 2 No. 6 of Commission Delegated Regulation (EU) 2017/565 of 25 April 2016.
    - o other derivatives[2] if the underlying is considered to be a commodity as defined in Article 2 No. 6 of Commission Delegated Regulation (EU) 2017/565 of 25 April 2016.

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[2] Listed in Section C10 of Annex I of MiFID II and in Article 8 of Commission Delegated Regulation (EU) 2017/565 of 25 April 2016

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5. REMARKS CONCERNING THE POSITION REPORT CONTENT
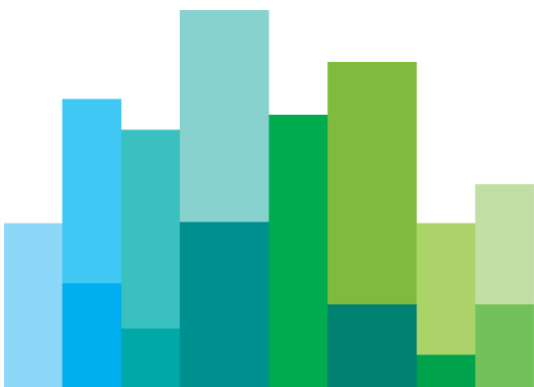
5.1 Remarks concerning the Position Report content

- SD products:
  - o Borsa Italiana has developed a technical solution in order to facilitate the reporting of positions held on SD. Two commodity tags are disseminated through the MIT305 file for SeDeX market. The first tag is aimed at helping Participants, from a technical point of view, in identifying those SD whose underlying is considered to be falling under the commodity derivatives definition according to Mifid2. The following underlying types are associated to the first commodity tag: commodities, commodity futures, other derivatives on commodities, commodity indices, commodity baskets and indices or derivatives on inflation rates or other macroeconomics variables. In case of a multi-asset underlying (e.g. a basket/index), the commodity tag is associated only in case the commodity or derivative commodity component is greater than 50%. The second tag is aimed at facilitating Participants in identifying those SD whose underlying is considered to be falling under the position reporting provisions. The following underlying types are associated to the second commodity tag: commodities, commodity baskets and indices. In case of a multi-asset underlying (e.g. a basket**/**index), the commodity tag is associated only in case the commodity component is greater than 50**%**. Please consider that according to ESMA Q&A issued on 7 July 2017, Participants have to report SD taking into consideration also the total number of securities in issue (above 2.5 million[1]).
  - o Borsa Italiana has also developed through Member Portal a warning message to be sent to Participant upon receipt of a position report on instruments not contained in the first commodity tag.
  - o Notwithstanding the technical tool developed by Borsa Italiana with the aim to support the Participants, from a technical point of view, it is of course understood that the compliance with laws and regulations on position reporting remains of the Participants. Participants are the sole liable to evaluate, identify and report the instruments in scope for position reporting. Therefore Borsa Italiana will report to the Authority the positions according to the Participants instructions as provided through the Member Portal.
- In case a Participant reports a position different from zero for a position holder on a security on a given day, the Participant is required subsequently to submit the updated position on a daily basis (even if the position is unchanged), until such position is zero or until the security is expired. After the reporting of a zero position, the holder's position is assumed to be nil until a new position report for such security and position holder is submitted by the Participant

  Please be aware that in case a position is not communicated by the Participant to the Member Portal, as a consequence that position will not be reported to the Authority. The Member Portal does not implement any logic to retrieve the position values not communicated by market Participants.

- Participants are required to submit the Position Report and the Clients Mapping Report to each TV as described in the below table:

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Table 1: Positions and Clients Mapping reporting obligations

MIC Code	Position Report	Clients Mapping Report
XDMI	Mandatory	Mandatory
SEDX	Mandatory (if the number of securities in issue is above 2.5 million[1])	N/A[3]

[3] Considering that weekly position report is not due for securitized derivatives, according to ESMA Q/A no. 5 on MIFID II and MIFIR commodities derivatives topics – Position reporting.

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6. POSITION REPORTING PROCESS
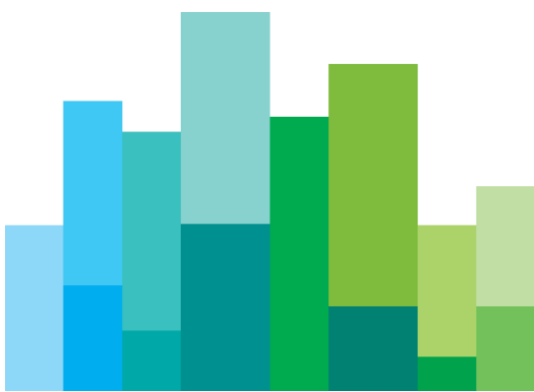
6.1 Process description

A new Member Portal section called "MIFID II -> Position Report" allows Participants to communicate the daily Position Report and the Clients Mapping report via web interface or via SFTP, as described below:

- Position Report:
    - upload of the position report file for each TV Identifier (MIC Code). A separate file for each MIC Code is required
    - access to the files sent on the current business day and on the previous days until T-2
- Clients Mapping (mandatory only for certain markets or segments as per Table 1):
    - upload of the Clients Mapping file for each Trading Venue
    - access to the data repository of the clients mappings via web interface
    - access to the files sent on the current business day and on the previous days until T-2
- Reports
    - download the report of Position Warnings for the previous trading day

6.2 Access to the Position Report section

The *Position Report* section is available on the dashboard of Borsa Italiana venues, allowing the Participant to manage only the mappings of the venue they have privileges on.

The new section can be accessed 24 hours a day by the Contract Representative of the venue and by the Company Users previously authorized by the Contract Representative in the *Company User Management* section. Anyway, the upload of the Positions Report and the Clients Mapping files is allowed only during the normal service hours (8:00 AM CET – 9:00 PM CET).

6.3 Position Report

6.3.1 File upload via web interface (GUI)

The Position Report file upload is possible through the *Positions Upload* page of the MIFID II –> *Position Report* section of the Member Portal.

The Positions Upload page includes the Bulk Upload table, listing only the most recent file uploaded by the user for each Trading Venue Identifier (MICCode) on the current day. The list shows only the file uploads related to the section of the Website (Venue) the user is logged into. For instance, if the user is in the Borsa Italiana section of Member Portal, only XDMI (IDEX and AGREX) and SEDX (SeDeX) file uploads will be displayed.

The following table details the fields of the Bulk Upload table:

Column Name	Description
Report Reference Number	The unique report identifier Reference Number of the Report as specified by the participant
Upload date	Date and time of the upload request
Status	Published = every record of the file was processed correctly Published with errors = at least one record of the file returned an error In progress = the bulk upload is still in progress Not Published = the file was not processed due to technical problems or every record of the file returned an error
Trading Venue Identifier (MIC Code)	Market (MIC Code) the positions refer to

Every row of the table will provide access to the following functionalities:

Details: Clicking on Details a pop-up will appear, allowing the user to download three reports:

- ResultsFile
- ErrorsFile (if present)
- Original file: the original file uploaded by the user

History: Clicking on "History", a pop-up will appear, listing the previous uploads for the same Trading Venue Identifier (MICCode) done on the current day and on the previous 5 trading days. For each record it is possible to download the ResultsFile, the ErrorsFile (if present) and the original file.

In order to make a new Position Report upload, the user shall click on the "New Position Report Upload" button. This button will be enabled only in case no previous bulk upload is being managed by the system in that moment. In case another bulk upload is in

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progress, a warning message will be shown alerting the user. As soon as the "New Position Report Upload" button is clicked, a pop-up will be shown, asking the user to select a file to upload in .xml format. The same pop-up will include a link to download a .xsd file containing the logical structure of the .xml file.

A confirmation will be requested to the user before proceeding with the upload.

6.3.2 File upload via SFTP

The Positions Report file can be uploaded also through a dedicated SFTP server. The SFTP service is available at **data.lseg.com**.

This address is public and no network configurations are needed to access the server.

The Contract Representative - or any other Company User previously authorized by the Contract Representative, can request a dedicated SFTP user directly through the Member Portal, in the *SFTP Users* page of the *Positions Report* section.

Each trading firm can request up to one SFTP user per single venue and must decide, at the time of the request, whether to upload the file by difference or from scratch. The root folder of the SFTP server is the FirmID which, in turn, contains an *IN* and a *OUT* folder with respectively read-write and read only access. These folders contain a subfolder *BY_DIFFERENCE* or *FROM_SCRATCH* depending on the upload method chosen at the time of the request of the SFTP user. Consequently, upload files has to be stored into the dedicated subfolder of the *IN* folder and *Results File* and *Errors File* (if available) must be retrieved in the dedicated subfolder of the *OUT* folder.

The following is the naming convention for the Position Report upload file:

Venue_PositionsReport_YYYYMMDD_TRADINGVENUEIDENTIFIER_NN.xml

Symbol	Description
Venue	BIT
YYYYMMDD	Date in the YYYYMMDD format
TRADING VENUE IDENTIFIER (MIC CODE)	XDMI = IDEX and AGREX SEDX = SEDEX
NN	Progressive number of the daily upload per firm/venue/trading venue identifier

ResultsFile has the same name of the original file with the "RES_" prefix. For instance:

RES_Venue_PositionsReport_YYYYMMDD_TRADING VENUE IDENTIFIER_NN.txt

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ErrorsFile (if available) has the same name of the original file with the "ERR_" prefix. For instance:

ERR_Venue_PositionsReport_YYYYMMDD_TRADING VENUE IDENTIFIER_NN.xml

6.3.3 File format specifications

The format of the .xml file to be used for the Position Report is the following:

Field Name	Description	Mandatory	Values
Date and Time of Report Submission	Date and time on which the report is submitted. This field will be populated or overwritten by Member Portal with the actual date and time of report submission	N	{DATE_TIME_FORMAT} Date and Time of the report as specified by the participant
Report Reference Number	Field to be populated with the unique identifier given by the submitter unambiguously identifying the report to both, submitter and receiving competent authority.	Y	{ALPHANUM-52} Reference Number of the Report as specified by the participant. It should be unique per FirmID
Date of the trading day of the reported position	Field to be populated with the date on which the reported position is held at the close of the trading day on the relevant trading venue.	Y	{DATEFORMAT} Date shall be formatted in the following format: YYYY-MM-DD Only T, T-1 and T-2 dates are accepted
Report Status	Indication as to whether the report is new or a previously submitted report is cancelled or amended. Where a previously submitted report is cancelled or amended, a report which contains all the details of the original report and using the original Report Reference Number should be sent and the 'Report status' should be flagged as 'CANC'.For amendments a new report that contains all the details of the original report and using the original Report Reference Number with all necessary details should be	Y	'NEWT' - New 'CANC' – Cancellation 'AMND' – Amendment

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Field Name	Description	Mandatory	Values
	sent and the 'Report status' should be flagged as 'AMND'.		
Reporting Entity ID	The identifier of the reporting investment firm. Field to be populated with the Legal Entity Identifier code (LEI) for legal entities or {NATIONAL_ID} for natural persons not having an LEI.	Y	For LEI: {ALPHANUM-20} For NATIONAL ID: {ALPHANUM-35}
Position Holder ID	Field to be populated with the Legal Entity Identifier code (LEI) for legal entities or {NATIONAL_ID} for natural persons not having an LEI. (Note: if the position is held as a proprietary position of the reporting firm, this field will be identical to field "Reporting entity ID" above).	Y	For LEI: {ALPHANUM-20} For NATIONAL ID: {ALPHANUM-35}
Email Address of Position Holder	Email address for notifications of position-related matters.	Y	{ALPHANUM-256}
Ultimate Parent Entity ID	Field to be populated with the Legal Entity Identifier code (LEI) for legal entities or {NATIONAL_ID} for natural persons not having an LEI. Note: this field may be identical to field "Reporting entity ID" or "Position holder ID" above if the ultimate parent entity holds its own positions, or makes its own reports.	Y	For LEI: {ALPHANUM-20} For NATIONAL ID: {ALPHANUM-35}
Email Address of Ultimate Parent Entity ID	Email address for correspondence in relation to aggregated positions.	Y	{ALPHANUM-256}
Parent of collective investment scheme status	Field to report on whether the position holder is a collective investment undertaking that makes investment decisions independently from its parent as set out by Article 4(2) of R. (UE) 591/2017 (RTS 21).	Y	'TRUE' – the position holder is a collective investment undertaking that makes independent investment decisions 'FALSE' – the position holder is not a collective investment undertaking that

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Field Name	Description	Mandatory	Values
			makes independent investment decisions
Identification code of contract traded on trading venues	ISIN Code	Y	{ALPHANUM-12}
Venue Product Code	This field must contain the exchange alphanumeric symbol for SD products or the following codes for IDEX and AGREX instruments: DWHEAT: durum wheat futures IDEB: Electricity baseload futures IDEP: Electricity peakload futures	Y	{ALPHANUM-12}
Trading Venue Identifier	MIC Code	Y	{ALPHANUM-4} 'XDMI' = IDEX and AGREX 'SEDX' = SEDEX
Position Type	Field to report whether the position is in either futures, options, emission allowances or derivatives thereof, commodity derivatives defined under point (c) of Article 4(1)(44) of Directive 2014/65/EU (e.g. securitised derivatives) or any other contract type (e.g. a contract under C10 of Annex I of the Directive 2014/65/EU).	Y	'OPTN' 'FUTR' 'EMIS' 'SDRV' 'OTHR' Based on the currently available products: 'FUTR' for IDEX and AGREX; 'SDRV' for securitised derivatives
Position Maturity	Indication of whether the maturity of the contract comprising the reported position relates to the spot 'SPOT' – spot month, including all positions in month or to all other months. Note: separate reports are required for spot months and all other months.	Y	'SPOT' 'OTHR' Based on the currently available products: 'SPOT' for all positions held on securitised derivatives 'SPOT' for spot month on IDEX and AGREX;

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Field Name	Description	Mandatory	Values
			'OTHER' for all other months on IDEX and AGREX;
Position Quantity	Field to be populated with the net position quantity held in the commodity derivative, expressed either in lots (when the position limits are expressed in lots) or units of the underlying. This field should be populated with a positive number for long positions and a negative number for short positions. If the position is in commodity derivatives defined under point (c) of Article 4(1)(44) of Directive 2014/65/EU (e.g. securitized derivatives) this field shall be populated with the number of units held.	Y	{DECIMAL-15/2} **IDEX**: If 'Notation of the Position Quantity' is 'LOTS', then PositionQuantity field shall contain the position in MWh/720 for baseload futures or Position in MWh/264 for peakload futures. If 'Notation of the Position Quantity' is 'MWh', then PositionQuantity field shall contain the position in MWh. **AGREX:** If 'Notation of the Position Quantity' is 'LOTS', then PositionQuantity field shall contain the position in MT/50. If 'Notation of the Position Quantity' is 'MT, then PositionQuantity field shall contain the position in MT. **SD:** If the position is on SD, the field shall be populated with the net position (positive or negative number) held in number of instruments. **For all markets**, the PositionQuantity field shall be populated with the positions held on that specific market only (BICCode).

Field Name	Description	Mandatory	Values
Notation of the Position Quantity	This field shall be populated with the units used to report the position quantity.	Y	For IDEX 'MWh' or 'LOTS' For AGREX 'MT' or 'LOTS' For SEDEX 'UNIT'
Delta Equivalent Position Quantity	If the Position Type is 'OPTN' or an option on 'EMIS', then this field shall contain the delta-equivalent quantity of the position reported in the "Position Quantity" field. This field should be populated with a positive number for long calls and short puts and a negative number for long puts and short calls	Y	{DECIMAL-15/2}
Indicator of whether the position is risk reducing in relation to commercial activity.	Field to report whether the position is risk reducing in accordance with Article 7 of R. (UE) 591/2017 (RTS 21)	Y	'TRUE' 'FALSE'

Please refer to **Annex I** for the fields format description.

6.3.4 Positions Upload

The Position Upload function is available in the Position Upload page of the MIFID II -> Positions Report section of the portal.

This function allows the user to report a new set of positions through a file (.xml) upload. The modification or deletion of an existing positions is also possible through this function. The "ReportStatus" field in the file can be used for this purpose.

The Position Upload is possible only in case no other Position Upload is in progress for the same firm / venue. In this case a warning message is shown alerting the user.

As soon as the file is uploaded, a first check on the format of the file is done, returning an error to the user in case of inconsistencies (i.e. wrong XML tags, invalid file extension, ...). Then, a format check is implemented for every row of the file.

The system manages each record of the file independently and returns:

- a new .csv file listing all the errors (*ErrorsFile*). The *ErrorsFile* is available only in case one or more errors are generated during the upload action. For every record that generates an error, a row is present in the *ErrorsFile,* listing the record row number and the error message. Only records that generates an error are listed in the *ErrorsFile;*

- a new .txt file listing the stats of the Position Upload operation (*ResultsFile).* In this file it's listed the amount of positions added, updated and deleted by the Position Upload operation;

- A PositionWarningsFile, containing all the positions that breaches consistency checks and potentially missing positions (see paragraph 6.3.6) is also returned on a daily basis. This file can be found in the MIFID II->Positions Report->Reports page;

The original file, the ErrorsFile (if present) and the ResultsFile are maintained by the system up to 5 working days.

The system will verify whether a record with the same logical key is already stored, according to the "ReportStatus" field as per the following sections.

6.3.4.1 NEWT

For each record in the file with ReportStatus= NEWT, the system verifies whether a record with the same logical key is present or not in the database.

The following cases may happen:

- A record with the same logical key is present on the DB: an error is returned in the *ErrorsFile* and no action is performed;

- no record with the same logical key is present on the DB: the record is stored in the system.

6.3.4.2 AMDN

For each record in the file with ReportStatus = AMND, the system verifies whether a record with the same logical key is present on the database.

The following cases may happen:

- a record with the same logical key is present on the DB: the record stored in the system is updated accordingly;

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- no active record with the same logical key is present on the DB: an error is returned in the *ErrorsFile* and no action is performed.

6.3.4.3 CANC

For each record in the file with ReportStatus=CANC, the system will verify whether a record with the same logical key is present on the database.

The following cases may happen:

- A record with the same logical key is present on the DB: the record is cancelled

- no active record with the same logical key is present on the DB: an error is returned in the *ErrorsFile* and no action is performed.

6.3.4.4 Logical key

Please note the logical key of a record (position) of the positions report is made by the following fields:

- Date of the trading day of the reported position

- Reporting entity ID

- Position holder ID

- ISIN Code

- Venue product code

- Trading Venue Identifier

Due to the previous point, an amend operation on a positions report only allows to change the following fields of a record (position):

- email address of the position holder

- ultimate parent entity id

- email address of the ultimate parent entity id

- parent of collective investment scheme status

- position type

- position quantity

- notation of the position quantity

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- delta equivalent position quantity

- position risk reducing

In case a field that is part of the key of a record (position) has to be changed, the position should be cancelled and created again.

The section MIFID II Services->Positions Report->Positions Management shows the list of the active positions already present in the system. Only the positions related to the last 5 business days are shown.

6.3.4.5 Restrictions

The following restrictions are applied to the content of the file:

- inside the same file, only a single record for each position should be present. For instance, it should not be possible to have a creation and a deletion for the same position in the same file. For this reason, in case two records with the same logical key are present in the same file, the system will return an error for each occurrence of the record in the file;

- All the records of the file have the same *Report Reference Number*;

- All the records of the file have the same *Report Status*;

- All the records of the file have the same *Trading Venue Identifier* (MIC Code);

- the "Date of the Trading Day of the Reported Position" value shall not be older than 2 trading days;

- the Trading Venue Identifier (MIC Code) field shall be compatible with the section of the website (i.e. "XDMI" or "SEDX" can be specified only in the Borsa Italiana section);

- the user shall fill the "Notation of the Position Quantity" field according the following rules:

    o IDEX: 'MWh' or 'LOTS'

    o AGREX: 'MT' or 'LOTS'

    o SEDEX: 'UNIT'

- for IDEX and AGREX markets (MIC Code XDMI), the user shall insert a position related to existing customers for the given venue, i.e. the Position Holder ID value shall be present in the Clients Mapping section (it should have been previously uploaded through a Clients Mapping file);

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6.3.5 Notifications (warning and error messages)

As soon as the ResultsFile or the PositionWarningsFile are available, the following notifications will be sent:

- The Contract Representative and the Company users of the same firm / venue will be alerted via email
- The Contract Representative and the Company users of the same firm / venue will be alerted with a notification message inside the website (pop-up)

The notifications include the link to the website area where the files can be downloaded

6.3.6 Position Warnings File

The Reports page allows the user to download the latest PositionWarningsFile generated by the system. Only reports regarding the section of the website (venue) the user is into are shown.

The PositionWarningsFile (if present) contains all the positions that breaches consistency checks and potentially missing positions. The ErrorCode allows to identify the warning raised.

Three consistency checks will be performed:

- Error Code 1 – Missing Position Update. Position supposed to be communicated on the current business day but not received.
- Error Code 2 – Position Amount Warning. If the Position Quantity is higher than a predefined threshold, this warning will be raised and a further confirmation of the reported position value is needed.
- Error Code 3 – Instrument Warning. A reported product might not be a commodity securitised derivative.

6.4 Clients mapping report

6.4.1 File upload via web interface (GUI)

The Clients Mapping file upload is possible through the Clients Mapping Upload section of the Member Portal. The modification or deletion of an existing mapping is also possible through this page.

The Clients Mapping Upload page includes the list of the uploads of the user (Clients Mapping table) of the last 5 trading days. The list only shows the file uploads related to the section of the website (Trading Venue) the user is into.

The following table details the fields of the Clients Mapping table:

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Column Name	Description
Upload ID	The unique identifier of the upload across the whole system. The identifier should be assigned by the system as soon as a the request is done.
Upload date	Date and time of the upload request
Status	Published = every record of the file was processed correctly; Published with errors = at least one record of the file returned an error; In progress = the bulk upload is still in progress; Not Published = the file was not processed due to technical problems or every record of the file returned an error

Every row of the table has a <u>Details</u> button: Clicking on Details a pop-up will appear, allowing the user to download three reports:

- ResultsFile;
- ErrorsFile (if present);
- Original file: the original file uploaded by the user.

In order to make a new upload, the user should click on the "New Clients Mapping Upload" button. This button will be enabled only in case no previous upload is being managed by the system in that moment. In case another upload is in progress, a warning message will be shown alerting the user. As soon as the "New Clients Mapping Upload" button is clicked, a pop-up will be shown, asking the user to select a file to upload in .csv format

6.4.2 File upload via SFTP

The Clients Mapping file can be uploaded also through a dedicated SFTP server. Details are the same specified at section 6.3.2.

The following is the naming convention for the Clients Mapping file:

Venue_ClientsMappings_YYYYMMDD_NN.csv

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Symbol	Description
Venue	BIT
YYYYMMDD	Date in the YYYYMMDD format
NN	Progressive number of the daily upload per firm/venue/market

ResultsFile has the same name of the original file with the "RES_" prefix. For instance:

 RES_ Venue_ClientsMappings_YYYYMMDD_NN.txt

ErrorsFile (if available) has the same name of the original file with the "ERR_" prefix. For instance:

ERR_ Venue_ClientsMappings_YYYYMMDD_NN.csv

6.4.3 File format specifications

The format of the .csv file to be used for the Clients Mapping Report is the following:

Field Name	Data Type	Description
Reporting Entity ID	character (35) NOT NULL	For LEI: {ALPHANUM-20} For NATIONAL ID: {ALPHANUM-35}
Position Holder ID	character (35) NOT NULL	LEI: 20 alphanumerical characters NATIONAL_ID: 35 alphanumerical characters
Category	character (1) NOT NULL	0=Natural Person 1=Investment firm or credit Institution 2=Investment Funds 3=Other Financial Institutions 4=Commercial undertakings 5=Operators with compliance obligations under Directive 2003/87/EC

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Field Name	Data Type	Description
Venue	character (1) NOT NULL	B='Borsa Italiana';
OperationType	character (1) NOT NULL	0=New; 1=Update; 2=Delete

Please refer to Annex I for the fields format description.

6.4.4 Report management (New Report, Update Report, Delete Report)

The user can upload a Clients Mapping file in order to:

- implement any change (insert, modify, delete) to the existing set of clients mappings, working by difference;
- replace the whole list of clients mappings with the ones included in the new file, working from scratch;

For this purpose, an option is present in the upload pop-up of the GUI asking the user whether he would like to delete all the existing clients mappings present in the system before proceeding with the new upload. The option is disabled by default. A confirmation stating the existing mappings will be deleted is requested to the user before proceeding.

The clients mappings upload function allows the Participant to insert a set of clients mappings for a given venue (depending on the section of the website the user is in) or change / delete existing mappings. Insertion, modification and deletion operations can be listed in the same file. The OperationType field in the file will be used by the system to understand which operation to implement.

- Create a New Clients Mapping

  o the OperationType field shall be set to 0

- Update an existing Clients Mapping:

  o the OperationType field shall be set to 1

  o The update of a Client Mapping must be executed before a predefined number of business days after the creation of the mapping. Only the Category field can be modified

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- Delete an existing Clients Mapping:

    o the Operation Type field should be set to 2

    o The deletion of a Client Mapping must be executed before a predefined number of business days after the creation of the mapping

The service will manage each record of the file independently and then will return:

- a new .csv file listing all the errors (ErrorsFile). The ErrorsFile will be available only in case one or more errors are generated during the upload action. For every record that generates an error, a row will be present in the ErrorsFile, listing the record row number and the error message. Only records that generates an error will be listed in the ErrorsFile;
- a new .txt file listing the stats of the bulk upload operation (ResultsFile). In this file it should be listed the amount of added, updated and deleted records;

The original file, as well as the ErrorsFile (if present) and the ResultsFile, are maintained by the system for 5 working days.

6.4.5 Notifications (warning and error messages)

Notifications are sent similarly to paragraph 6.3.5.

6.4.6 Clients Mappings List

The Clients Mapping page shows the list of the active clients mappings.

The following table details the fields of the Clients Mapping table:

Column Name	Description
PositionHolder	LEI or National ID of the holder of the positions
Category	Category of the position holder, according to ITS4. • Natural Person • Investment firm or credit Institution • Investment Funds • Other Financial Institutions • Commercial undertakings • Operators with compliance obligations under Directive 2003/87/EC

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Only records related to the section of the website (Trading Venue) the user is into are shown. By default only 10 items per page will be shown. The user could change the number of items per page working on the dedicated listbox on the bottom of the page. The following options will be available: 5, 10, 20, 30 50, 75 items.

The user could use the search filters on the top of the page to see only a subset of data. The following filters are present:
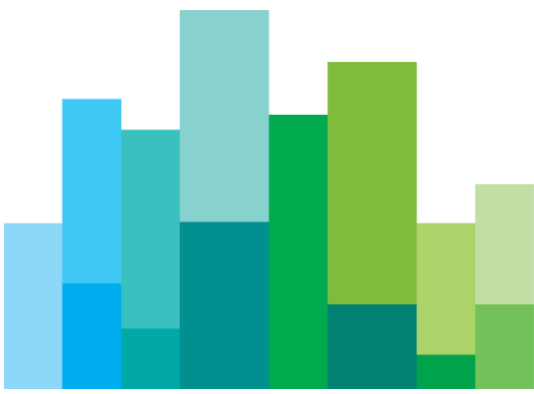
Field Name	Description	Values
Position Holder	Free text field. Only exact match search available.	
Category	Listbox	All. **Default value;** • Natural Person • Investment firm or credit Institution • Investment Funds • Other Financial Institutions • Commercial undertakings • Operators with compliance obligations under Directive 2003/87/EC

The "Download Report" button allows the participant to download a .csv file containing all the records according to the filters used. Only records related to the venues the user has privileges on can be downloaded. The following fields are included in the file:

• PositionHolder

• Category

• Venue

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7. ANNEX I

7.1 Annex I Fields format description

Field	Details to be reported	Format for reporting
{ALPHANUM-n}	Up to n alphanumerical characters	Free text field.
{DECIMAL-n/m}	Decimal number of up to n digits in total of which up to m digits can be fraction digits	Numerical field for both positive and negative values: - decimal separator is '.' (full stop); - negative numbers are prefixed with '-' (minus). Where applicable, values are rounded and not truncated.
{DATEFORMAT}	ISO 8601 date format	Dates shall be formatted in the following format: YYYY-MM-DD.
{DATE_TIME_FORMAT}	ISO 8601 date and time format	- Date and time in the following format: YYYY-MM-DD-Thh:mm:ss.dddddZ. - 'YYYY' is the year; - 'MM' is the month; - 'DD' is the day; - 'T' – means that the letter 'T' shall be used; - 'ss.dddddd' is the second and its fraction of a second; - 'Z' is UTC time. Dates and times shall be reported in UTC.
{MIC}	4 alphanumerical characters	Market identifier as defined in ISO 10383.
{INTEGER-n}	Integer number of up to n digits in total	Numerical field for both positive and negative integer values.

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