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RDT Guide to Reporting via the Direct Transaction Reporting System.

This Guide is Annex 1 to AMF instruction n° 2007-06 on reporting transactions on financial instruments to the AMF by investment service providers and their branches.

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RDT guide to transaction reporting via the direct transaction reporting system - Annex 1 to AMF instruction n° 2007-06 on reporting of transactions on financial instruments to the AMF by investment service providers and their branches

1. PURPOSE OF THE DOCUMENT

The Autorité des Marchés Financiers (AMF) supplies the entities mentioned in Article 315-46 of its General Regulation with a computerised Direct Transaction Reporting system (*Reporting Direct des Transactions - RDT*) to report the transactions they have executed to the AMF.

This document has two main purposes:

> ➢ to present the technical and functional upgrades of the direct transaction reporting system
> ➢ to present the practical terms for reporting OTC derivatives transactions (new obligation in force since 1st January 2012).

1.1. RDT SYSTEM UPGRADE FOR THE PERIMETER OF FINANCIAL INSTRUMENTS ADMITTED TO TRADING ON A REGULATED MARKET (MR) OR A MULTILATERAL TRADING FACILITY (MTF)

The upgrades of the RDT system described in this new version of the RDT Guide concern all investment services providers, including asset management companies and the branches established in France of service providers approved in another European Economic Area State other than France, which must report to the AMF on the transactions they execute on financial instruments as mentioned in Article 315-46 of the AMF General Regulation.

This new version responds to two main requirements:

> ➢ enhance the automatic checks on the declarations that are received: the new "package 1" checks went into production as of July 2011 and the new "package 2" checks in mid -October 2011 (cf. indicated in blue in the text),
>
> ➢ adapt the RDT system in line with the "*Gestion de la dette française en capital*" project (**cf. 8.2.5 / field D11**).

The RDT Guide update is also an opportunity for the AMF to provide additional explanations of the working of the RDT system in response to the many questions asked since 1st November 2007 by the institutions subject to transaction reporting requirements.

These concern in particular:

> ➢ the terms of implementation of the AII code in the RDT system: incorporation into the RDT Guide of the specifications published by the CESR in 2007 (**cf. 7.3 and 8.2.5 / fields C1-C2**) ;
>
> ➢ the integrity tests applied to the declarations that are received: description of the technical checks applied to each file that is received prior to the functional checks applied to each declaration (**cf. 8.2.1, 8.2.2 et 8.2.3**), and allocation of a rejection code to each check (**cf. 8.1) ;**
>
> ➢ the test environment placed at the disposal of establishments (**cf. 6.3**).

1.2. EXTENSION OF THE RDT SYSTEM TO THE PERIMETER OF FINANCIAL INSTRUMENTS NOT ADMITTED TO TRADING ON A REGULATED MARKET OR A MULTILATERAL TRADING FACILITY, BUT THE VALUE OF WHICH DEPENDS ON A FINANCIAL INSTRUMENT ADMITTED TO TRADING ON A SUCH A MARKET OR FACILITY (ENTRY INTO FORCE ON 1ST JANUARY 2012)

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The extension of the RDT system to OTC derivatives, the practical terms of which are described in this new version of the RDT Guide V3 (Cf. passages identified by an "OTC Derivatives" flag), concerns all investment services providers and branches established in France of service providers approved in another European Economic Area State, except asset management companies, which much report to the AMF on the transactions they execute on a financial instrument as mentioned in Paragraph II *bis* of Article 315-46 of the AMF General Regulation

This new version of the RDT Guide V3 therefore:

  ➢ presents the standards expected for filling out the new fields relating to the entry into force on 1st January 2012 of reporting on OTC derivatives,

  ➢ presents the different integrity checks that go with these new declaration fields.

Readers are reminded that the AMF has chosen to comply with the reporting principles set out in the document published in October 2010 by the Committee of European Securities Regulators (CESR) "How to report transactions on OTC derivative instruments" (ref: CESR/10-661) (cf. document in French attached to this document, in Paragraph 10.3).

The sections of this document referring to the extension of the RDT system to OTC derivatives are identified by a flag indicating the particularity related to this extension.

OTC Derivatives   Passages on the extension of RDT to OTC derivatives.

2. TARGET AUDIENCE

This document is intended both for the compliance officers (investment services / internal control or equivalent) of the entities mentioned in Article 315-46 of the AMF General Regulation and for the (company and project management) IT teams of these entities.

It contains "Business" and "Technical" information: the sections of this document are identified by "flags" indicating the nature of the information they contain.

Business

Information of a functional or operational nature intended mainly for compliance officers and IT project management teams

Technical

Information of a technical nature intended mainly for company and project management IT teams.

Business

Technical

3. AMF SUPPORT

To facilitate the application of transaction reporting provisions, several support documents will be made available online to complement this guide, in the "Transaction Reporting" section of the RCSI/RCCI Area (Compliance Area) of the AMF website.

However, if you would like further details after reading these documents, or if you should encounter particular difficulties using the Direct Transaction Reporting System, AMF teams are at your disposal to answer any questions you might have.

To facilitate monitoring, the AMF asks you to submit your questions by e-mail to the following general addresses:

- For any functional questions (scope of reporting requirements, how to fill out the fields): **rdt@amf-france.org** (questions sent to this general mailbox are handled by the Market Intermediaries Division in the Markets Directorate).

- For any technical questions (login or file transfer problems): **ExploitationAMF@amf-france.org**, with a copy to the address rdt@amf-france.org.

4. TERMINOLOGY

The following definitions will apply throughout this document:

1. "French regulated market": a regulated market within the meaning of Article L. 421-1 of the Monetary and Financial Code.

2. "Regulated market": a regulated market in a European Economic Area State.

3. "Investment services provider" (ISP): investment services providers are investment firms and credit institutions that have been granted an authorisation to provide investment services within the meaning of Article D321-1 of the Monetary and Financial Code. The term "ISP" will be used in its broadest sense, encompassing French investment services providers, including asset management companies, providers approved in another European Economic Area State and equivalent entities in third countries.

4. "Reporting firm": this term refers to the entities mentioned in Article 315-46 of the AMF General Regulation, which is to say French investment service providers, their branches established in another European Economic Area State, or branches established in France of service providers approved in another European Economic Area State.

5. "Financial instruments": unless otherwise stated, the financial instruments mentioned in Article L. 211-1 of the Monetary and Financial Code admitted for trading on a regulated market in a European Economic Area State and/or admitted to an organised multilateral trading facility within the meaning of Article 525-1 of the AMF General Regulation.

6. "Multilateral trading facility" (MTF): a multilateral trading facility within the meaning of Article L. 424-1 of the Monetary and Financial Code or an equivalent system in a European Economic Area State.

7. "Systematic internaliser": an investment services provider conducting systematic internalisation activity as defined in Article L 425-1 of the Monetary and Financial Code, or its equivalent in a European Economic Area State

8. "TREM": the computerised Transaction Report Exchange Mechanism system for exchanging information between the different European regulators, as provided by the MiFID within the framework of the ESMA (Committee of European Securities Regulators in 2007).

5. PURPOSE OF DIRECT TRANSACTION REPORTING

5.1. MARKET ABUSE DETECTION

RDT reports are fed into the SESAM application (Expert System for Market Activity Monitoring) and processed daily by the detection systems designed by the Market Supervision Division. These comprise both generic tests to detect statistically abnormal variations (notably in prices, trade volumes or operator market share) and specific tests designed to detect particular scenarios (e.g. front-running).

Since 2007, the AMF's supervision systems have gradually been extended and today they cover the main asset classes falling within the scope of transaction reporting.

5.2. INTERMEDIARY MONITORING AND SPECIFIC ANALYSES

The declarations are also processed by the Market Intermediaries Division as part of its individual intermediary monitoring activities or for the purpose of specific analyses. Enhancing the reliability of the reports submitted to the AMF is one of the missions of this division, in close cooperation with the Market Supervision Division.

5.3. INFORMATION EXCHANGES BETWEEN EUROPEAN REGULATORS

A large proportion of the transaction reports submitted to the AMF are passed on each day to other European regulators within the Transaction Reporting Exchange Mechanism (TREM).

An RDT report submitted to the AMF is transmitted directly:

➢ To the regulator of the country of origin if the report comes from a French branch of a foreign ISP (whatever the financial instrument concerned by the transaction). For example, any transaction reported to the AMF by the French branch of a German ISP is sent to the BAFIN via the TREM system (and in return, any transaction reported to the BAFIN by the German branch of a French ISP is sent on to the AMF).

➢ To the competent regulator if the transaction concerns a financial instrument for which another regulator is competent (cf. Articles 9, 10 and 14 of European Regulation EC 1287/2006). For example, any transaction reported to the AMF and concerning a financial instrument for which the FSA is the competent authority is transmitted to the FSA via the TREM system (and in return, any transaction reported to the FSA and concerning a financial instrument for which the AMF is the competent authority is sent on to the AMF).

5.4. CAPITAL IMPORTANCE FOR THE AMF OF THE QUALITY AND COMPLETENESS OF REPORTS

Given the now intensive processing of RDT reports, directly by the AMF or indirectly by its counterparts, the quality and completeness of the reports that are submitted are of capital importance to the AMF, since they influence the ability of the regulator to fulfil its mission of market supervision and intermediary monitoring.

The AMF therefore pays particular attention to compliance of institutions with their transaction reporting obligations.

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6. LOGIN APPLICATION PROCEDURE

6.1. SITUATION OF YOUR INSTITUTION REGARDING DIRECT TRANSACTION REPORTING: THE FUNCTIONAL QUESTIONNAIRE

In application of Article 8 of AMF Instruction n°2007-06, the functional questionnaire published in the "Transaction Reporting" section of the Compliance Area of the AMF website must be completed out by the RCCI / RCSI of your institution and sent back in electronic form only to the address rdt@amf-france.org.

No matter how many functional and technical stakeholders are involved in implementing the system, the compliance and internal control officer (RCCI) / investment services compliance officer (RCSI) remains the main correspondent of the AMF. Consequently, only connection applications coming from the institution's RCCI / RCSI will be taken into consideration.

The information indicated in the functional questionnaire must reflect the situation of the entity at the time when the questionnaire is submitted. In particular, the BIC 11 code indicated in the questionnaire must correspond to a code referenced by SWIFT. If the indicated BIC code is not referenced by SWIFT, the login issue process is suspended.

NB: any entity newly approved by the ACP or AMF must send the AMF the completed functional questionnaire to define its situation as regards transaction reporting requirements, including if the entity considers that it is not subject to such requirements given the nature of its activities. It is the responsibility of the RCSI/RCCI to ensure that the functional questionnaire in the possession of the AMF is kept up to date at all times: an updated questionnaire must therefore be sent to the AMF whenever information supplied in the questionnaire changes (change of BIC code, new contact details, a new agent, etc.).

6.2. RDT SYSTEM CONNECTION CREATION

The AMF sends the RCCI / RCSI making the application a technical guide describing the RDT system connection terms and a technical questionnaire about the characteristics of your institution's information system required to configure the connection.

The technical guide contains all the information your institution needs to choose the most appropriate reporting procedure, along with confidential information about how to log in to the AMF network. It is therefore for reasons of IT security that this guide is not published on the AMF website and is only distributed on request to institutions wishing to log in.

The RCCI / RCSI making the application returns the completed technical questionnaire in electronic form only to the address ExploitationAMF@amf-france.org with a copy to rdt@amf-france.org.

The AMF sends the identifiers required to log in to the RCCI / RCSI making the application via the SESTERCE secure system. Your institution's technical team will now have all the information it needs to finalise activation of the connection in collaboration with the IT department of the AMF.

6.3. RDT CONNECTION TESTS

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Once the settings have been configured in accordance with the information transmitted via the abovementioned technical questionnaire, your institution's technical team can get in touch directly with the AMF IT Department to test the connection (send / receive). After this test phase, the connection is operational from a technical point of view.

A minimum period of 3 weeks should be allowed between sending the completed technical questionnaire to the AMF and operational activation of the connection.

NB: should your institution stop using an existing connection (mandate given to a third party for all transactions executed, termination of the reported activity, merger with another institution that already has a connection) please inform the AMF to this effect.

Once the RDT connection is technically operational, the AMF strongly recommends that institutions should use the test environment placed at their disposal to check (before going into production) that the reports generated by their systems comply with the specifications in the RDT Guide.

Only the reporting system by file transfer ("RDT*F" channel) is concerned by the tests. Given that use of the reporting system by Extranet ("RDT*E" channel) does not require any IT development, it is not included in the test environment.

The test environment provided allows "end-to-end" tests (from sending the report file through to generating the feedback file) and gives a true image of the behaviour of the production system, but it is not designed to handle comparable volumes to those in the production system. Consequently, reporting institutions are requested to limit the size of the test files they send (maximum 100,000 transaction reports).

However, if an institution does wish to conduct tests on larger volumes for a particular reason, the environment does allow it: in such cases, the institution should contact the AMF beforehand (by mail to rdt@amf-france.org).

6.3.1.   Test environment access – prior information of the AMF

Any institution wishing to access the test environment must send an e-mail to the address: rdt@amf-france.org indicating:

- the name of the institution
- its RDT connection technical identifier
- the contact details of a reference person designated for the tests (name, telephone n° and e-mail)
- the preferred test starting date
- the provisional test end dates

As soon as the necessary parameter settings have been configured by the AMF on the test platform, an e-mail is sent to the institution to inform it that it can start to send test files. These parameter settings are configured within 24 hours, except in the case of an incident.

If an institution wishes to extend the tests beyond the provisional end date initially supplied, it must inform the AMF to this effect no less than 24 hours in advance, by e-mail to rdt@amf-france.org, indicating the new provisional end date.

6.3.2.   Test file submission terms

The test files must be transmitted by the production channel. The "**test_**" prefix must be added in front of the file name. The files must therefore comply with the following naming rule:

test_NNNNNNNNNNNYYYYMMDD.N where:

- ✓ "_test" allows the AMF systems to identify that the file being sent is a test file and must be routed to the test environment.
- ✓ NNNNNNNNNN is the 10-character caller identifier (or "RDT login") indicated on the access form provided by the AMF.
- ✓ YYYYMMDD is the date of the date of production of the file.
- ✓ N is the sequence number of the file in the day.

Beware! Those files that do not comply with the "_test" name format will be fed into the production systems.

6.3.3. Processing and feedback file supply terms

The file(s) will be processed on the test platform at a regular frequency which will be no more often than daily. It is not technically feasible to process files several times a day. Priority will also be given to production processing in all circumstances, which may lead to tests being suspended for several days in the event of an incident.

The reports sent to the test environment undergo all the checks that exist in the production environment.

The feedback file updated after each test process will be made available in the feedback folder in the form of a file named "**test_**feedback.txt" (production feedback is named "feedback.txt").

If you should not have received updated feedback three business days after sending the test files, you should send an e-mail to this effect to rdt@amf-france.org. The provisional date for the supply of the feedback will then be given to you.

If the updated feedback file after a test process should indicate that no file has been received from your institution when the files were sent and were compliant with the "test_" naming rule, you should apply the following procedure:

1. Send the test files again by the production channel and check that the "**test_**" prefix has been added in front of the file name.

2. Send an e-mail to ExploitationAmf@amf-france.org, with a copy to rdt@amf-france.org, indicating the name of your institution, its technical connection identifier, the name(s) of the file(s) sent and the number of records contained in each file.

3. A receipt will be sent by the AMF to confirm that it has received the test files. Otherwise, the AMF IT Department will get in touch with the contact person designated for the tests to identify the cause of the problem.

6.3.4. End of the tests

When an institution has completed its tests, it must send an e-mail to rdt@amf-france.org indicating:

- the name of the institution
- its RDT technical connection identifier

This information conditions the deletion of the test parameters for your institution and therefore ends the supply of test feedback. This deletion is carried out within 24 hours, except in the event of an incident.

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7. INFORMATION REQUIRED IN EACH REPORT

This section provides a functional description of the information that must be transmitted in each report. It is understood that a report corresponds either to the sell or the buy side of the transaction. Consequently, a transaction between two counterparties will give rise to two transaction reports.

The expected reports must also give a true image of the characteristics of one transaction, and **not of flows of settlement operations**. This distinction is essential to ensure compliance of the information transmitted, in particular regarding transaction price, trading time and counterparty identification.

7.1. IDENTITY OF THE ENTITY SUBJECT TO REPORTING REQUIREMENTS

This information corresponds to the "1. Reporting firm identification" field in Table 1 of Annex 1 to Regulation (EC) n°1287/2006 of 10 August 2006.

This is therefore the identity of the "reporting firm" as defined in Chapter 4, meaning the entity whose transactions must be reported as part of its regulatory obligations. It is not necessarily the entity that transmits the transaction report to the AMF.

Only the 11-character BIC code is authorised: entities without a BIC code must contact Swift to apply for a BIC code to be allocated to them.

Further information about BIC codes is available on the Swift website at the following address: http://www.swift.com/products/bic_directory.

If a reporting firm corresponding to a single entity for regulatory purposes (a service provider authorised by the CECEI, branch, or asset management company authorised by the AMF) has several BIC 11 codes (one per location, for example), it must always identify itself using the same BIC 11 code it supplied to the AMF and its counterparties previously. Allowing for exceptions if justified, this will be the BIC 11 code in which the branch code is "XXX" ("generic" branch). The "XXX" branch code must also be used for reporting firms that have just one BIC code and have never applied to SWIFT for the creation of a Branch code; this is the case of asset management companies, notably.

In the case of mutual groups, the distinction between the different regional entities – which constitute distinct entities for regulatory purposes – is often made in the branch code. In this particular case, the "XXX" generic branch code may not be used.

Examples:
  ➢ The *Banque Postale* must always identify itself using the code PSSTFRPPXXX
  ➢ The *Caisse d'Epargne de Picardie* must always identify itself using the code CEPAFRPP802

7.2. IDENTITY OF THE ENTITY TRANSMITTING THE REPORT

Instruction 2007-06 gives reporting firms the possibility of using several different channels for reporting all or some of the transactions they execute, and in particular the possibility of delegating this activity to a third party.

This information therefore corresponds to the identity of the entity responsible for transmitting the transaction reports to the AMF (third parties delegated by the reporting firm, or order matching or reporting systems authorised by the AMF). Given that such recourse to third parties is optional, these fields need only be used if there is such a third party.

Third parties delegated by a reporting firm on the terms set out in Article 8 of Instruction 2007-06 must identify themselves using their 11-character BIC code. Regulated markets and MTFs must identify themselves using their 4-character MIC codes (Market Identifier Code - ISO standard 10383)

7.3. FINANCIAL INSTRUMENT WHICH IS THE SUBJECT OF THE TRANSACTION

This information corresponds to fields "6. Instrument identification", "7. Instrument code type", "8. Underlying instrument identification", "9. Underlying instrument identification code type", "10. Instrument type", "11. Maturity date", "12.Derivative type", "13. Put/call", "14. Strike price" and "15. Price multiplier" fields in Table 1 of Annex 1 to Regulation (EC) n°1287/2006 of 10 August 2006.

7.3.1. Case of a transaction on a financial instrument admitted to a RM or MTF of the EEA

All financial instruments admitted to trading on a regulated market in the European Economic Area and having an ISIN code must be identified by this code, including the listed derivatives. Further information on the ISIN standard (ISO 6166) is available on the website of the ANNA (Association of National Numbering Agencies) at the following address: http://www.anna-web.com/index.php/home/isinsaiso6166.

In the absence of an ISIN code for the financial instrument in question, and only in this case, the instrument must be identified by its AII (Alternative Instrument Identifier) code, in accordance with release CESR 07_627b, dated 26 October 2007 (cf. pages 2 and 6 of the release).

The type of identifier – ISIN or AII – to be used for each market is specified in the "Instrument identifier" column of the "Regulated Markets" section on the ESMA MIFID Database website (http://mifiddatabase.esma.europa.eu/).

The AII code must be used notably for transactions executed on EUREX and on derivatives markets managed by Euronext (LIFFE UK, LIFFE Brussels, etc.)

7.3.2. Case of a transaction in a financial instrument not admitted to a RM or MTF, but the value of which depends on a financial instrument admitted to trading on such a market or system

In the case of a transaction on OTC derivatives, the financial instrument subject to the transaction should be identified by:

➢ the ISIN code of the underlying asset of the derivative (**mandatory field**)

E.g.

For an option executed over the counter in which the underlying asset is a financial instrument admitted to trading on a RM of the EEA, the financial instrument should be identified by the ISIN code of the stock concerned by the option.

Likewise, in the case of a CDS in which the underlying asset is a financial instrument admitted to trading on a RM of the EEA, the financial instrument should be identified by the ISIN code of the reference bond of the CDS.

➢ the Markit clip (markit code) for a transaction concerning a CDS contract (optional field)

➢ the type of derivative (**mandatory field**):

o "O" for Options
o "W" for Warrants

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- o "F" for Futures / Forwards
- o "D" for CFD / TRS
- o "X" for Spread Bets
- o "S" for Swaps
- o "Z" for CDS
- o "K" for Complex Derivatives

➢ the option type code (obligatory field for options / warrants) :

- o "C" for option / warrant call contracts
- o "P" for option / warrant put contracts

➢ the price multiplier (obligatory field for options / warrants / futures – forwards / CFD – TRS)

➢ the strike price (obligatory field for options / warrants)

➢ the maturity date (obligatory field for options / warrants / futures – forwards / CFD – TRS)

If the derivative has its own ISIN, this may be given (optional field)

7.4.   IDENTIFICATION OF THE TRADING VENUE

This information corresponds to field "21. Venue identification" in Annex 1, Table 1 of Regulation (EC) n°1287/2006 of 10 August 2006.

According to its nature, the trading venue will be identified:
- by the code "XOFF" for OTC transactions
- by its MIC code for regulated markets and MTFs
- by its BIC code for systematic internalisers
- by the "XXXX" code for OTC derivatives transactions

Further information about the ISO 10383 standard (MIC codes) is available on the website of the ANNA at the following address http://www.anna-web.com/index.php/home/micaiso10383.

7.5.   DIRECTION OF THE OPERATION FOR THE REPORTING FIRM

This information corresponds to field "4. Buy/sell indicator" in Annex 1, Table 1 of Regulation (EC) n°1287/2006 of 10 August 2006.

It must be filled out according to the following principle:
➢ If the reporting firm executed the transaction on its own account, this is the direction of the operation from the perspective of the reporting firm.
➢ If the reporting firm executed the transaction for the account of a client, this is the direction of the operation from the perspective of the client.

7.6.   QUANTITY OF SECURITIES, CONTRACTS OR NOMINAL VALUES TRADED

This information corresponds to fields "18. Quantity" and "19. Quantity notation" in Annex 1, Table 1 of Regulation (EC) n°1287/2006 of 10 August 2006.

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The quantity traded must be expressed:

➢ As a number of units (number of securities or number of financial contracts) for financial instruments traded on a unit basis,

➢ As a nominal amount for bonds traded by nominal amount,

For OTC derivatives transactions, you should refer to the CESR guidelines, the French translation of which is attached in 10.3.

The "quantity type" (new field D11) states whether the quantity is expressed as a number of units or as a nominal amount. The creation of this new field aims to adapt the RDT system to the "*Gestion de la dette française en capital*" project (switchover scheduled in Q4 2011).

The integration of this new field in reporting will be managed in two phases:

➢ As of July 2011, institutions that express the quantity in nominal amounts in the RDT reports are invited to fill out this new field,

➢ Once the marketplace migration has taken effect, all institutions must express the quantity according to the rules provided in the AFTI / CFONB specifications by filling out the new "quantity type" field with "FMT" when the quantity is expressed as a nominal amount and with "UNT" when the quantity is a number of securities.

However, to limit the impact of this change, those institutions that do not trade on bond markets, and whose transactions concern only financial instruments for which the quantity is expressed in units, are authorised to leave this new field empty: the empty value, (i.e. 3 spaces), like "UNT", will therefore mean that the quantity is expressed in units.

This new field is also placed at the end of the file (in the first three characters of the filler provided initially) so that the existing structure of the reports remains unchanged.

7.7.   UNIT PRICE OF THE TRANSACTION

This information corresponds to field "16. Unit price" in Annex 1, Table 1 of Regulation (EC) n°1287/2006 of 10 August 2006.

It is completed by two items of information indicating how the price is expressed, corresponding to field "17. Price notation" in Annex 1, Table 1 of Regulation (EC) n°1287/2006 of 10 August 2006.

This is the price per security or derivative contract excluding fees / commission and, for transactions on securitised debt, excluding accrued interest (clean price expressed as a %).

For transactions on financial futures, it is the unit price of a contract expressed in a currency, and does not necessarily correspond to the price quoted on the market (as the latter may be expressed in index points or in price per tonne, and does not take account of the multiplier which is specific to each contract).

For OTC derivatives transactions, you should refer to the CESR guidelines, the French translation of which is attached in 10.3.

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The "Price type" field allows a distinction to be made between prices expressed as a percentage and prices expressed in units (in monetary units). For prices expressed in monetary units, the currency of the price must be indicated using the ISO 4217 standard with 3 alphanumerical characters. Further information on the ISO 4217 standard is available on the website of the International Organization for Standardisation (ISO) at the following address http://www.iso.org/iso/en/prods-services/popstds/currencycodeslist.html

7.8. TOTAL AMOUNT OF THE TRANSACTION

This amount must correspond to the gross amount of the transaction (excluding commission). For securitised debt, this amount includes the accrued interest.

> ➢ This field is obligatory for all securities transactions.
> ➢ It is optional for financial futures instruments (the notion of "amount traded" is of little significance for futures contracts, for example)
> ➢ It is not required for OTC derivatives transactions.

A second field specifies the currency in which the total amount of the transaction is expressed. The information indicated in this field must be consistent with the "amount" field.

7.9. IDENTITY OF THE COUNTERPARTY

This information corresponds to field "20. Counterparty" in Annex 1, Table 1 of Regulation (EC) n°1287/2006 of 10 August 2006.

The counterparty of the transaction will be identified:

> ➢ If the counterparty is an ISP, by its 11-character BIC code which must be referenced in the BIC directory published by SWIFT.
>
> The identification of the counterparty by a BIC 11 code is obligatory:
> • For all transactions executed on regulated markets or MTF that are not anonymous (this is notably the case of certain bond platforms).
> • For all OTC transactions with an ISP from the EEA.
> • For all OTC derivatives transactions with an ISP from the EEA.

> ➢ If the report concerns an operation executed anonymously on a regulated market or an MTF, the counterparty will be considered to be the said market or MTF (or the central counterparty for the market in question, for example the clearing house), which must be identified by its MIC code.

> ➢ When the counterparty of a transaction is neither an ISP from the EEA nor an MTF nor a regulated market (or its central counterparty), the counterparty is considered "non-reportable". Also, if this counterparty is not itself subject to reporting requirements, the AMF will receive only one report for the transaction in question.
>
> However, if the counterparty of the transaction is a financial institution established in a State outside the European Economic Area, or an entity that is not an ISP but is identified by a BIC code, it may be reported on condition that it can be identified by its BIC 11 code.

> When the transaction is executed on the terms defined in Article 315-46, Paragraph II of the AMF General Regulation (transaction on own account the execution of which is delegated to a third party), the identity of the counterparty will not be filled out (the third party to whom execution of the order is delegated is not the counterparty of the transaction). However, the "indirect" nature of the execution will be specified so that the AMF can distinguish between these transactions and the transactions executed by the reporting firm itself.

NB:

If the counterparty is an ISP, the identifier given must enable the market counterparty to be identified and not, if it is different, the settlement counterparty.

E.g.

> An OTC transaction executed between ISP A and ISP B with account keeping for the latter handled by ISP C. The settlement operation will be between ISP A and ISP C, but ISP A must identify ISP B as its counterparty in its RDT report.

7.10. TIMING OF THE TRANSACTION

This information corresponds to field "2. Trading day" and to field "3. Trading time" in Annex 1, Table 1 of Regulation (EC) n°1287/2006 of 10 August 2006.

The trading day of the transaction is reported in the format YYYY-MM-DD and the trading time is reported in the format HH:MM:SS (ISO 8601 standard).

Further information on the ISO 8601 standard is available on the website of the International Organization for Standardisation (ISO) at the following address http://www.iso.org/iso/en/prods-services/popstds/datesandtime.html.

The reference trading time of the operation is the time in Paris, France, even if the transaction was executed on a market located in another time zone.

For transactions executed on an electronic system, the expected trading time is the time at which the buying and selling interests were matched to conclude the transaction. For OTC transactions, it is the time at which the two counterparties agreed on the characteristics of the operation (quantity traded and price). The AMF accepts that there may be a slight difference between the precise trading time and the time when it was recorded in the systems, but the difference between the actual trading time and the reported time may in no case exceed 15 minutes.

The AMF reminds you that ISP must declare each transaction they execute on a unit basis: consequently, for all orders executed on a split basis, one report should be submitted for each split execution (one order split into N operations will therefore generate N transaction reports).

The only possible exception to this rule concerns institutions performing transactions on their own behalf with execution being delegated to a third party (such as ISP A, which delegates execution to ISPB in case N°5 described in 11.1.2): if ISP A does not receive the detail from ISP B of the split executions but only a global confirmation slip, ISP A has no other alternative than to report a single transaction with a trading time corresponding to the time of the last execution.

7.11. THEORETICAL SETTLEMENT DATE

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This is the date of delivery of the financial instruments as scheduled at the time of the trade.

When the transaction is executed on Day D, the agreed date for delivery of the securities is standardised at D+3 business days on Euronext Paris. However, for an OTC transaction, the two counterparties may agree on a non-standard delivery date, such as D+5 or D+7, for example.

This information is obligatory for transactions concerning securities. It plays a role in defining the price of transactions on bonds and is used for the downstream checks performed by the AMF. However, **it must be left empty for transaction reports on financial futures**.

7.12. NATURE OF THE OPERATION

This information corresponds to field "5. Trading capacity" in Annex 1, Table 1 of Regulation (EC) n°1287/2006 of 10 August 2006.

It specifies the nature of the operation for the reporting firm, which must distinguish between two types of operation:

➢ Transaction executed on its own account: this must be indicated by a "P" for "Principal" (definition in the European Regulation: on its own account and on its own behalf or on its own account and on behalf of a client).

➢ Transaction executed for the account of a third party: must be indicated by an "A" for "Agent" (definition in the European Regulation: for the account and on behalf of a client).

7.13. UNIQUE REPORT IDENTIFIER

This information corresponds to field "22. Transaction reference number" in Annex 1, Table 1 of Regulation (EC) n°1287/2006 of 10 August 2006.

This field must be completed with the unique internal reference of the transaction report in the systems of the entity issuing the report. This reference must never be repeated over time and must allow the audit trail to be traced back to the operation recorded in the reporting firm systems.

It will be used in particular for the purposes of dialogue between the reporting firm and the AMF, which may occasionally need to ask the reporting firm for additional information about the characteristics of the reported transaction. It is also indispensable for managing cancellations/modifications, and for monitoring the recycling of rejected transaction reports.

7.14. CANCELLATION INDICATOR

This information corresponds to field "23. Cancellation Flag" in Annex 1, Table 1 of Regulation (EC) n°1287/2006 of 10 August 2006.

The procedures for filling out this field are specified later (Paragraphs 8.2.5). However, the general principle is as follows:

- To cancel a report previously sent to and integrated by the AMF system, a cancellation report identical to the initial transaction report should be sent, but with the cancellation flag filled out as "O".

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- <u>To modify a transaction report</u> previously sent to and integrated by the AMF system, two reports must be sent: a cancellation report and a modified transaction report (cf. specifics of reports via Extranet in Paragraph 8.13).

NB: if a report is rejected by the AMF system, a corrected report must be transmitted as promptly as possible; however, there is no need to transmit a cancellation report to cancel the report that has been rejected.

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8. REPORT TRANSMISSION PROCEDURES

Two information transfer modes are placed at the disposal of reporting firms or the third parties delegated by them to report transactions via RDT:

- a transactional system via extranet suited to entities with a small volume of transactions to be reported ("RDT*E" mode).

- SFTP file transfers ("RDT*F" mode) for entities with a large volume of transactions to be reported.

If it so wishes, an entity may have access to both reporting modes (file transfer and manual input via extranet) and may use the most suitable method for each kind of business (e.g. file transfer for high-volume activities and extranet input for low-volume activities).

8.1. TRANSACTION REPORTING BY EXTRANET (RDT*E)

The details of the functions of this extranet will be presented in a specific user manual which will be updated as and when any modifications are made to the system.

8.1.1. Report data entry form

The data entry form is accessible via the "Input" menu in the "Report management" section.

The rules for filling out the fields are strictly identical to the rules applicable to reports by file transfer (see Paragraph 8.2.4) except that there is no need to fill out partially-completed fields with zeros or spaces.

The following functions are also accessible in the "Report management" section:

➢ View the history of transaction reports made via RDT*E ("View" menu).

➢ Modify / cancel reports entered into RDT*E ("View" menu).

➢ Configure the data entry form ("Profile" menu): this menu is used to record a certain number of default parameters (e.g. reporting firm identifier).

8.1.2. Reporting deadlines

All reports entered via RDT*E on Day D until 23.59pm are considered as having been submitted on Day D. In accordance with the provisions of Article 315-46, Paragraph III of the AMF General Regulation, a transaction executed on Day D must therefore be entered no later than the business day following the trading date at 23.59pm, according to the TARGET calendar.

Late reports will be integrated into the RDT system on condition that they comply in all other respects with the specifications set out in this Guide, but they will generate alerts that are sent to the issuing entity and monitored by the services of the AMF.

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8.1.3.   Report modification / cancellation management

The "View" menu is used to access the history file of reports entered via RDT*E. The detail of the reports transmitted by file transfer (RDT*F) cannot be viewed via the extranet. Users have access only to reports made under their own identifier.

Modifications / cancellations may be made to all the RDTE transaction reports available in the history file consulted in this way, using the "Modify" or "Cancel" buttons. The extranet then generates the expected reports automatically. The "Cancel" function generates a cancellation report with the same characteristics as the initial report without the user having to enter all the characteristics again. The "Modify" function can generate both the cancellation report and the correction report without having to input all the data again.

It is also possible to cancel a report sent by file via extranet, but this does require manual input, via the data entry form, of a report with the same characteristics as the initial report, except for the cancellation flag which must be marked as "Yes" (cancellation report).

Likewise, it is possible to modify a report sent by file via extranet by entering a cancellation report and then entering a corrected report. The corrected report and cancellation report must both have the same unique report identifier as the initial transaction report.

Although this second procedure is more time-consuming, it does allow an incorrect report to be cancelled or modified without having to generate a file.

Reminder: there is no need to cancel a report that has been rejected as it has not been integrated into the AMF system.

The "Statistics" menu in the extranet can be used by reporting firms that report exclusively via extranet to display the content of feedback relating to them.

This screen can also be used by reporting firms that report by file transfer (RDT*F) to make a daily check that the information they have transmitted has been correctly integrated.

The "Statistics" menu in the extranet can also be used to display a daily history report going back 30 days.

This screen provides an alternative or a complement to use of the feedback files.

8.2.   REPORTING FILE GENERAL STRUCTURE (RDT*F)

Technical

This paragraph describes the expected structure of the file and its content.
Each file will be made up of three parts: a header record, a file body comprising a record for each report, and an end of file record.

The information expected in the file, the structure of which is defined in the tables on the following pages, is of two kinds:
- Obligatory information: indicated by an "O"
- Conditional information: indicated by a "C"

The following rules will be used by reporting firms or the third parties to whom they delegate reporting for completing the fields:

- **Rules applicable to alphanumeric fields:**

⇒ *Standardisation*: characters belonging to the ASCII standard

⇒ *Justification / Padding:* the content of alphanumeric fields must be left-justified with padding spaces (ASCII spaces) coming after the content

- **Rules applicable to number fields:**

⇒ *Decimals:* the point (".") will be used as decimal separator.

⇒ *Justification / Padding:* the content of the number field will be right-justified and completed to the left with zeros, if applicable (cf. format applicable to these fields in the table below).

- **Rule applicable to conditional fields:**

⇒ When a conditional field is not to be completed for the transaction report in question, it must be filled out with spaces. E.g. put in 12 spaces (ASCII spaces) for a field 12 characters long.

- **General remark on field size:**

⇒ A safety margin has been allowed in the reporting file structure for the size of certain fields, to avoid major modifications of the structure if a standard should be changed (E.g. the "reporting firm code" field contains 15 characters despite the fact that BIC codes only have 11).

8.2.1. Expected naming standard

❑ **File naming rules:**

When an SFTP connection is used (RDT*F): the file name must comply with the following format: NNNNNNNNNNNYYYYMMDD.N where:

➢ NNNNNNNNNN is the caller identifier (or 10-character "RDT login" on the access form provided by the AMF).
➢ YYYYMMDD is the date and day of production of the file.
➢ N: is the file production order number in the day.

E.g. "**LOGINRDT0120110211.1**":

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The file that is transmitted will keep the name initially given by the institution throughout the RDT system processing chain. Therefore, the file name indicated in the feedback files that are sent each day will be that allocated by the institution when it sent the report.

Integrity checks applied to the file name:

➢ If the ISP login identifying the issuing entity is not a valid 10-position RDT login: whole file rejected (technical check T001).
➢ If the file name does not contain a "." (point) in 19th position: whole file rejected (technical check T002).
➢ If the file name does not contain a date between the 11th and 18th position (format: YYYYMMDD): whole file rejected (technical check T003).
➢ If a figure of between 1 and 999 is not present after the "." whole file rejected (technical check T003).

8.2.2.   Header record   Technical

N°	Fields	Type	Size	Oblig / Cond	Comments
1	Record type	A	2	O	"E " = header (letter "E" followed by an ASCII space)
ET1	Technical code identifying the issuing identity	A	10	O	This code is equal to the RDT*F login supplied to each issuing entity by the AMF. If reporting has been delegated to a third party, it is the code of the third party that must be entered. NB: An issuing entity may request the allocation of several RDT*F or RDT*E logins (for reports sent by several physical sites …).
ET2	Creation date	A	10	O	Date the file was created ISO 8601 standard: YYYY-MM-DD
ET3	Creation time	A	8	O	Time the file was created ISO 8601 standard: hh:mm:ss
ET4	File number on creation date	N	3	O	001= first file of the day, 002= second file of the day, … The file numbers must be consecutive and in sequence for a given issuing entity (field ET1) and for a given day (00.00 hours to 23.59 hours)
ET5	End of record	A	1	O	Carriage return (decimal code 13 / ISO-CEI standard 646)

Record length   34

❑   **Fields ET1 to ET5: header record**

These fields indicate the identity of the issuing entity, the file creation date, the file creation time and the number of the file on that creation date.

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The file header must comprise 33 characters followed by a carriage return, making a total length of 34 characters.

Example of a header: **E** LOGINRDT012011-01-0119:02:55001 (for a reporting identity whose RDT identifier is "LOGINRDT01", for a file produced on 1st January 2011 at 19:02 :55 with the sequence number "001").

Integrity checks applied to the header:
   ➢   If the file transmitted is totally empty (meaning it contains neither a header nor a footer): whole file rejected (technical check T004).
   ➢   If the header record does not begin by an E + an ASCII space: whole file rejected (technical check T005).
   ➢   If the length of the header is not 33 characters plus a carriage return: whole file rejected (technical checks T007 and T008).
   ➢   If field ET1 does not contain the 10-character RDT login identifying the issuing entity: whole file rejected (technical check T009).
   ➢   If field ET2 does not contain a valid 10-character creation date in YYYY-MM-DD format (ISO 8601 standard): whole file rejected (technical check T010)
   ➢   If field ET3 does not contain a valid 8-character creation time in HH:MM:SS (ISO 8601 standard): whole file rejected (technical check T011).
   ➢   If field ET4 does not contain the 3-character file number (in sequence if several files are sent): whole file rejected (technical check T012).
   ➢   If field ET4 is not a number between 1 and 999: whole file rejected (technical check T013).

8.2.3.   End of file record

Technical

N°	Fields	Type	Size	Oblig / Cond	Comments
1	Record type	A	2	O	"F " (letter "F" followed by an ASCII space)
FF1	Technical code identifying the issuing identity	A	10	O	Same as field "ET1" above.
FF2	Creation date	A	10	O	Same as field "ET2" above.
FF3	Creation time	A	8	O	Same as field "ET3" above.
FF4	File number	N	3	O	Same as field "ET4" above.
FF5	Counter of the records sent	N	8	O	Number of records in the body of the file (excluding the header record and end of file record)
FF6	End of record	A	1	O	Same as field "ET5" above.

Record length   42

❑   **Fields FF1 to FF6: End of file record**

This record repeats the same information as that composing the file header, except for 2 differences:
   ✓   It begins by "F" instead of "E"

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✓ The exact number of lines composing the body of the file (meaning the number of transaction reports) must be specified in 8 characters.

The end of file record must be composed of 41 characters followed by a carriage return, making a total length of 42 characters.

Example of an end of file record: F LOGINRDT012011-01-0119:02:5500100000023 (for a reporting identity whose RDT identifier is "LOGINRDT01", for a file produced on 1st January 2011 at 19:02:55 with the sequence number "001" and containing 23 transaction reports).

Integrity checks applied to the end of file record:
➢ If the file does not have an end of file record: whole file rejected (technical check T006).
➢ If the length of the end of file record is not 41 characters plus a carriage return: whole file rejected (technical checks T018 and T019).
➢ If field FF1 does not contain the 10-character RDT login identifying the issuing entity: whole file rejected (technical check T020).
➢ If field FF2 does not contain a valid 10-character creation date in YYYY-MM-DD format (ISO 8601 standard): whole file rejected (technical check T021).
➢ If field FF3 does not contain a valid 8-character creation time in HH:MM:SS (ISO 8601 standard): whole file rejected (technical check T022).
➢ If field FF4 does not contain the file number of the number if not between 1 and 999: whole file rejected (technical check T023)
➢ If field FF5 "counter of the record lines contained in the file" is not consistent with the content of the file: whole file rejected (technical check T025).

Integrity cross-checks:
➢ If several files sent on the same market trading day under the same RDT login have the same ET4 (header) number or FF4 (end of file) number: all the files rejected (technical checks T012, T024 and T026).

8.2.4. Structure and content of records comprising the body of the file

Each record must contain the following categories of information:

A: Information on the entity subject to reporting requirements (the reporting firm),
B: Information on the entity issuing the transaction report, if different from A
C: The financial instrument which is the subject of the transaction
D: Description of the transaction
E: Identity of the counterparty
F: Timing of the transaction
G: Nature of the operation
H: Cancellation / modification management

8.2.4.1 Case of a transaction on financial instruments admitted to trading on an RM and/or MTF in the EEA

N°	Fields	Type	Size	Oblig / Cond	Comments
1	Record type	A	2	O	Fixed content: "D1"
	A: Identity of the entity subject to reporting requirements				

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N°	Fields	Type	Size	Oblig / Cond	Comments
A1	Reporting firm identifier type	A	3	O	Only one code admitted: "BIC"= BIC standard (ISO 9362 standard)
A2	Reporting firm code	A	15	O	11-character BIC code.
	B : Identity of the entity issuing the report				*B fields to be completed only if the transaction report is issued by an entity other than that identified in A*
B1	Issuing entity identifier type	A	3	C	Two codes admitted: - "BIC" (ISO 9362) for all French or EEA ISPs and for authorised reporting systems (to be confirmed by Swift) - "MIC" (ISO 10383) for a regulated market or MTF (multilateral trading facility)
B2	Issuing entity identifier	A	15	C	According to the nomenclature of the standard indicated in B1
	C : Financial instrument which is the subject of the transaction				
C1	Security code type	A	3	O	Admitted codes: - "ISN" = ISIN code obligatory for financial instruments that have one. - "LOC" = AII code obligatory for financial instruments that do not have an ISIN code
C2	Security code	A	60	O	Identifier of the security according to the standard indicated in C1 (ISIN or AII code)
	D : Description of the transaction				
D1	Trading venue code type	A	3	O	Three codes are admitted: - "MIC": MIC standard (ISO 10383) for regulated markets and MTF, - "BIC": BIC standard (ISO 9362) for systematic internalisers - "OTC" for over the counter transactions

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N°	Fields	Type	Size	Oblig / Cond	Comments
D2	Trading venue	A	15	O	Identifier of the trading venue according to the standard indicated in D1: - MIC code (4 characters) for MTFs and regulated markets - BIC code (11 characters) for systematic internalisers - "XOFF" for over the counter transactions
D3	Direction of the operation for the reporting firm	A	1	O	"B"= Buy, "S"= Sell
D4	Quantity of securities / contracts / nominal amounts traded	N	20 (14.5)	O	The quantity must be expressed as a whole number of securities / contracts traded or as a nominal amount. However, the field must be filled out with 5 decimal places.
D5	Price type	A	3	O	"PCT" for prices expressed as a %. "PIE" for prices expressed in units.
D6	Price currency	A	3	C	3-character currency code according to the ISO 4217 standard. To be filled out only for prices expressed in units.
D7	Unit price	N	20 (11.8)	O	Unit price expressed as a % or in currency in line with fields D5 and D6. This field must be filled out systematically with 8 decimal places. For bond transactions, this is the price excluding accrued interest expressed as a percentage % (clean price) except when market practice is unit pricing (e.g. convertible bond), in which case it is the price including accrued interest ("dirty price")
D8	Total amount of the transaction	N	20 (14.5)	C	Gross amount (excluding commission), filled out with 5 decimal places. This field is obligatory for securities but optional for derivatives.
D9	Currency of the amount	A	3	C	Currency code of the amount (ISO 4217) This field is obligatory for securities but optional for derivatives.

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N°	Fields	Type	Size	Oblig / Cond	Comments
D10	Unique report identifier	A	40	O	Unique reference identifying each transaction report in the systems of the reporting ISP.
E : Identity of the counterparty					
E1	Counterparty identifier type	A	3	O	Four codes are admitted: - "BIC": BIC standard (ISO 9362) if the counterparty is an ISP from the EEA, or a branch of an ISP from the EEA - "MIC": MIC standard (ISO 10383) if the counterparty is a regulated market or an MTF - "IND" for a transaction on own account for which execution is delegated to a third party - "CND" otherwise (non-reportable counterparty)
E2	Counterparty identifier	A	15	O	Counterparty identifier according to the standard indicated in E1: - BIC code (11 characters) for ISPs - MIC code (4 characters) for MTFs and regulated markets - Empty if E1 = "CND" or "IND"
F: Timing of the transaction					
F1	Transaction day	A	10	O	YYYY-MM-DD (ISO standard 8601)
F2	Transaction time	A	8	O	HH:MM:SS (ISO standard 8601) Local time in Paris, France.
F3	Theoretical settlement date	A	10	C	YYYY-MM-DD (ISO standard 8601) To be filled out for transactions on securities
G: Nature of the operation					
G1	Nature of the operation	A	1	O	"A" for the account of a third party (Agent) "P" for own account (Principal)
H: Cancellation / modification management					
H1	Cancellation flag	A	1	O	"O" to indicate cancellation, "N" otherwise
New fields and filler					

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N°	Fields	Type	Size	Oblig / Cond	Comments
D11	Quantity type	A	3	O[1]	Two codes are admitted: - "UNT": if the quantity is expressed as a number of securities (the empty value is also admitted in this case). - "FMT": if the quantity is expressed as a nominal amount.
I1	Filler	A	97	O	Empty field
I2	End of record		1	O	"Carriage return" character

Record length   **378**

8.2.4.2 Case of an over the counter transaction on a single-name OTC derivative in which the underlying asset is a financial instrument admitted to trading on a RM in the EEA

N°	Fields	Type	Size	Oblig / Cond	Comments
1	Record type	A	2	O	Fixed content: "**D2**"
	A: Identity of the entity subject to reporting requirements				
A1	Reporting firm identifier type	A	3	O	Only one code admitted: "BIC"= BIC standard (ISO 9362 standard)
A2	Reporting firm code	A	15	O	11-character BIC code.
	B : Identity of the entity issuing the report				*B fields to be completed only if the transaction report is issued by an entity other than that identified in A*
B1	Issuing entity identifier type	A	3	C	Two codes admitted: - "BIC" (ISO 9362) for all French or EEA ISPs and for authorised reporting systems (to be confirmed by Swift) - "MIC" (ISO 10383) for a regulated market or MTF (multilateral trading facility)
B2	Issuing entity identifier	A	15	C	According to the nomenclature of the standard indicated in B1

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[1] The obligatory nature of this field will take effect as of October 2011(cf. 6.6).

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N°	Fields	Type	Size	Oblig / Cond	Comments
	C : Financial instrument which is the subject of the transaction				
C1	Security type code	A	3	O	Only one code admitted: "XXX" for OTC derivatives
C2	Derivative ISIN code	A	60	C	ISIN code (ISO 6166)
C3	Underlying asset ISIN code	A	12	O	ISIN code (ISO 6166)
C4	Markit clip	A	9	C	- Markit code - Empty
C5	Derivative type	A	1	O	- Options: "O" - Warrants: "W" - Futures / Forward: "F" - CFD / TRS: "D" - Spread bets: "X" - Swaps (other than CFD, TRS and CDS): "S" - CDS: "Z" - Complex derivatives: "K"
C6	Option type code	A	1	C	- Call: "C" - Put: "P" - Empty
C7	Price multiplier	N	20 (14.5)	C	
C8	Strike price	N	20 (14.5)	C	This field will be completed with a maximum of 5 decimals. No currency is associated with this field.
C9	Maturity date	A	10	C	YYYY-MM-DD (ISO 8601 standard)
	D : Description of the transaction				

N°	Fields	Type	Size	Oblig / Cond	Comments
D1	Trading venue code type	A	3	O	Only one code admitted: "OTC" for OTC derivatives
D2	Trading venue	A	15	O	- Only one code admitted: "XXXX" for OTC derivatives
D3	Direction of the operation for the reporting firm	A	1	O	"B"= Buy, "S"= Sell.
D4	Quantity	N	20 (14.5)	O	Cf. CESR guideline in 10.3
D6	Price currency	A	3	C	3-character currency code according to the ISO 4217 standard. To be filled out only for prices expressed in units.
D7	Unit price	N	20 (11.8)	O	Cf. CESR guideline in 10.3
D10	Unique report identifier	A	40	O	Unique reference identifying each transaction report in the systems of the reporting ISP.
	E : Identity of the counterparty				
E1	Counterparty identifier type	A	3	O	Three codes are admitted: - "BIC": BIC standard (ISO 9362) if the counterparty is an ISP from the EEA, or a branch of an ISP from the EEA - "CND" otherwise (counterparty not declarable) - **"IND" not admitted**
E2	Counterparty identifier	A	15	O	Counterparty identifier according to the standard indicated in E1: - BIC code (11 characters) for ISPs - Empty if E1 = "CND"

N°	Fields	Type	Size	Oblig / Cond	Comments
	F: Timing of the transaction				
F1	Transaction day	A	10	O	YYYY-MM-DD (ISO standard 8601)
F2	Transaction time	A	8	O	HH:MM:SS (ISO standard 8601) Local time in Paris, France.
	G: Nature of the operation				
G1	Nature of the operation	A	1	O	"A" for the account of a third party (Agent) "P" for own account (Principal)
	H: Cancellation / modification management				
H1	Cancellation flag	A	1	O	"O" to indicate cancellation "N" otherwise
	I: Others				
I1	Filler	A	63	O	Empty field
I2	End of record		1	O	"Carriage return" character

8.2.5.   Rules on filling out data and integrity checks

In addition to the description of the file structure, the purpose of this section is to provide details on the content of the fields in two complementary forms: illustrations by examples and a description of the integrity checks that will be performed by the AMF on each of these fields.

❑   **Field 1: Record type**

This field identifies the nature of the transaction transmitted to AMF.

Only two codes are admitted:

➢   D1 if the report concerns a transaction on a listed instrument admitted to trading on a RM or an MTF in the EEA.
➢   D2 if the report concerns a transaction on a single-name OTC derivative in which the underlying asset is a financial instrument admitted to trading on a RM in the EEA.

❑   **Fields A1 and A2: Identity of the entity subject to reporting requirements**

These fields give the identity of the "reporting firm" as defined in Chapter 4, which is to say the entity whose transactions must be reported as part of its regulatory requirements. It is not necessarily the entity that transmits the transaction report to the AMF.

Only 11-character BIC codes are authorised. In addition, the BIC codes that are used must be published in the directory of SWIFT (http://www.swift.com/biconline/index.cfm), the agency that issues and registers all valid BIC codes.

Integrity checks:
> ➢ If A1 or A2 is empty: transaction report rejected (functional check R003).
> ➢ If A1 <> "BIC" (A1 different from "BIC"): transaction report rejected (functional check R004)
> ➢ If A2 is not the BIC 11 code of a reporting firm registered with the AMF: transaction report rejected (functional check R008).

❑ **Fields B1 and B2: Identity of the entity transmitting the transaction report**

These fields identify the entity in charge of transmitting the reports to the AMF (third party delegated by the reporting firm or trade matching or reporting system authorised by the AMF). Given that such recourse to third parties is optional, these fields need only be used if there is a third party. If the transaction reports are not handled by a third party, fields B1 and B2 must remain empty.

Integrity checks:
> ➢ If B1 is empty and B2 is not empty: transaction report rejected (functional check R009).
> ➢ If B1 is not empty and B2 empty: transaction report rejected (functional check R010).
> ➢ If B1 <> ("BIC", "MIC", empty): transaction report rejected (functional check R011).
> ➢ If B1 = "MIC" and B2 is not the MIC code of an issuing entity registered with the AMF: transaction report rejected (functional check R012).
> ➢ If B1 = "BIC" and B2 is not the BIC 11 code of an issuing entity registered with the AMF: transaction report rejected (functional check R012).
> ➢ If B1=A1 and B2=A2: transaction report rejected (the issuing entity must only be completed if it is different from the reporting entity) (functional check R013).

Integrity cross-check:
> ➢ If the issuing entity indicated in B1-B2 is not authorised to transmit reports via the ET1 technical identifier (RDT login) for reporting entity A1-A2: transaction report rejected (functional check R014).

❑ **Fields C1 to C9: financial instrument which is the subject of the transaction**

a) **Field C1: Security type code**

Field C1 indicates the standard used to identify the security which is the subject of the reported transaction. It can contain the values "ISN", "LOC", "XXX"

⇨ ***Case of a transaction executed on a financial instrument admitted to trading on an RM or MTF in the EEA:***

> ➢ "ISN" for all financial instruments admitted to a regulated market in the European Economic Area or to a French organised multilateral trading facility and possessing an ISIN code.

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> "LOC", for "local": in the absence of an ISIN code for the financial instrument in question, and only in this case, the said instrument must be identified by its AII code (cf. 7.3.1).

⇨ **_Case of a transaction executed on a single name OTC derivate in which the underlying asset is a financial instrument admitted to trading on a MR in the EEA_**

> ''XXX'' for any over the counter transaction on OTC derivatives

b) Field C2: Security code

Field C2 contains the code for the standard indicated in C1

⇨ **_Case of a transaction executed on a financial instrument admitted to trading on a RM or MTF in the EEA:_**

> The 12-position ISIN code of the security if C1 = "ISN".
> **_E.g._** "FR0000130007" for Alcatel (NB: the first two characters must be capital letters)

> The AII code for the instrument if C1 = "LOC"

The various components of the AII code are described in document CESR 07-627b. In the RDT system, these components must be concatenated in field C2 (note that the product code must be completed by spaces to the right if it does not contain 12 characters):

Component n°	Name	Size	Description
1	MIC code	4	Identification of the trading venue.
2	Product code	12	Identification of the product code of the contract*
3	Derivative type	1	"O" for an option and "F" for a future.
4	Option type	1	"C" for a call, "P" for a put and "F" for a future
5	Contract maturity date	10	YYYY-MM-DD (ISO 8601 standard)
6	Option strike price	13.5	Strike price with five decimals

* This product code corresponds to the mnemonic code of the contract. It is generally available on the website of regulated markets that admit derivatives for trading. Any institutions that might encounter difficulties identifying the code should ask the company managing the regulated market in question.

Example 1 – Futures contract:

"XEURFESX   FF2008-07-23", where XEUR = MIC code of EUREX, FESX = product code on the Future Euro Stoxx 50 (completed by 8 spaces) for the EURO STOXX 50 INDEX future, maturity 23/07/2008 traded on EUREX

Example 2 - **Option:**

"XEUROESX   OP2011-05-150000000003600.00000", where OESX = option product code on Euro Stoxx 50 (completed by 8 spaces) for the EURO STOXX 50 INDEX put option, maturity 15/05/2008, strike price 3600, traded on EUREX

⇨ **_Case of a transaction executed on a single name OTC derivate in which the underlying asset is a financial instrument admitted to trading on a MR in the EEA_**

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> ➢ The ISIN code of the derivative if this data is known (optional field)

Integrity checks:

➢ If C1 <> ("ISN", "LOC"): transaction report rejected (functional check R015).

➢ If C1 <> "XXX" for an OTC derivative transaction: transaction report rejected (functional check R015.1)

➢ If C1 = "LOC" for an OTC transaction (which can only be on a security with an ISIN code): transaction report rejected (functional check R016).

➢ If C2 is empty: transaction report rejected (functional check R017).

➢ If C1 = "ISN" and C2 is not a valid ISIN code*: transaction report rejected (functional check R018).

* It is compliance of the reported security code with the ISIN standard that is checked, and not its presence in the AMF reference list of securities.

Specific AII code integrity checks:

➢ If D2 = "MIC" of a regulated market for which the use of the AII code is obligatory and C1 = "ISN": transaction report rejected (new functional check R025).

➢ If D2 = "MIC" of a regulated market or MTF for which use of the ISIN code is obligatory and C1 = "LOC": transaction report rejected (new functional check R026).

➢ If component n°1 of the AII code (MIC code) is not that of a regulated market for which use of the AII is authorised: transaction report rejected (new functional check R027).

➢ If component n°1 of the AII code (MIC code) is not consistent with the trading venue indicated in D2: transaction report rejected (functional check R066).

➢ If component n°2 of the AII code (product code) is empty: transaction report rejected (new functional check R067).

➢ If component n°2 of the AII code (product code) contains unauthorised special characters: transaction report rejected (new functional check R068).

➢ If component n°3 of the AII code (derivative type) <> "O" or "F": transaction report rejected (new functional check R069).

➢ If component n°4 of the AII code (option type) <> "C", "P" or "F": transaction report rejected (new functional check R070).

➢ If the concatenation of components n°3 and n°4 of the AII code (derivative type and option type) is different from "OC", "OP" or "FF": transaction report rejected (new functional check R071).

➢ If component n°5 of the AII code (maturity date) is not in format YYYY-MM-DD (ISO 8601 standard): transaction report rejected (new functional check R072).

➢ If component n°5 of the AII code (maturity date) is earlier than the trading date (field F1): transaction report rejected (new functional check R073).

➢ If component n°6 of the AII code (strike price) is completed when component n°3 (derivative type) is "F": transaction report rejected (nouveau functional check R074).

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> If component n°3 of the AII code is "O" and component n°6 (strike price) is negative or zero: transaction report rejected (new functional check R075).

> If component n°6 of the AII code is not in the expected format, which is to say 13.5 (13 whole figures and 45 decimals): transaction report rejected (new functional check R076).

c) Field C3: underlying ISIN code   OTC Derivatives

Field C3 contains the ISIN code (ISO 6166 standard) of the underlying of the OTC derivative.

Example 1 – Option

For a purchase OTC of 2000 options on France Telecom stock, field C3 should be completed with the ISIN code FR0000133308, corresponding to the ISIN code of France Telecom shares.

Example 2 – CDS

For the purchase of protection (a CDS on Alcatel) on Alcatel debt over the counter, field C3 should be completed with the ISIN code ISIN FR0000189201 corresponding to the ISIN code of the reference bond of Alcatel.

Integrity checks:

> If C3 is empty: transaction report rejected (functional check R080).
> If C3 is not a valid BIC code on the date of the transaction: transaction report rejected (functional check R081).

d) Field C4: Markit clip   OTC Derivatives

Field C4 contains the Markit code of the reference bond underlying the CDS (optional field).

Integrity check:

> C4 must be completed only for a transaction on a CDS contract, otherwise transaction report rejected (functional check R084).

obligatory
e) Field C5: Derivative type   OTC Derivatives

Field C5 contains the letter identifying the type of derivative concerned by the transaction. It can contain the following values:

> "O" for Option
> "W" for Warrant
> "F" for Future / Forward
> "D" for CFD / TRS
> "X" for Spread bet
> "S" for Swap (other than CFD, TRS and CDS)
> "Z" for CDS

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➢ "K" for complex derivatives

Integrity check:

➢ If C5 <> "O, W, F, D, X, S, Z, K" or empty, transaction report rejected (functional check R082)

f) **Field C6: Option type code**

Field C6 contains the letter identifying the type of option. It can contain the values "C" for Call and "P" for Put (optional field).

Integrity check:

➢ If C6 <> "C, P" or empty, transaction report rejected (functional check R086)

g) **Field C7: Price multiplier**

Field C7 contains the price multiplier, meaning the number of units of derivatives or securities represented by a single contract (optional field)

Integrity checks:

➢ If C7 <> the expected format (14.5), i.e. 14 whole figures and 5 decimals, transaction report rejected (functional check R087)
➢ If C7 < 0, transaction report rejected (functional check R088)

h) **Field C8: Strike price**

Field C8 contains the strike price of an option or another financial instrument expressed in the main currency of the transaction (for example, in Euros rather than in cents) (optional field)

Integrity checks:

➢ If C8 <> the expected format (14.5), i.e. 14 whole figures and 5 decimals, transaction report rejected (functional check R089)
➢ If C8 < 0, transaction report rejected (functional check R090)

i) **Maturity date**

Field C9 contains the maturity date of the derivative in YYYY-MM-DD format (ISO 8601 standard) (optional field).

Integrity checks:

➢ If C9 <> the expected YYYY-MM-DD format, transaction report rejected (functional check R091)
➢ If C9 (maturity date) < F1 (trade date), transaction report rejected (functional check R092).

❑ **Fields D1 and D2: identification of the trading venue**

Field D1 - Trading venue code type – designates the reference standard used to identify the trading venue. Field D2 indicates the trading venue in which the operation was executed:

D1	D2	Trading venue
"MIC"	MIC code	Regulated market or MTF
"BIC"	BIC code	Systematic internaliser
"OTC"	"XOFF"	Over the counter
"OTC"	"XXXX"	OTC derivative

Integrity checks:
- If D1 = "OTC" and D2 <> "XOFF": transaction report rejected (functional check R020).
- If D1 <> ("BIC", "MIC", "OTC"): transaction report rejected (functional check R021).
- If D1 = "BIC" and D2 is not the valid BIC 11 code of a systematic internaliser on the trading date F1: transaction report rejected (functional check R023).
- If D1 = "MIC" and D2 is not a valid MIC code on the trading date F1: transaction report rejected (functional check R024).
- If D1 = "OTC" and D2 <> "XXXX" for a transaction on OTC derivatives, transaction report rejected (functional check R020.1).
- If D1 <> "OTC" for a transaction on OTC derivatives, transaction report rejected (functional check R021.1)

Integrity cross-checks:

- If no operation was executed on this security (C2) on Euronext (field D2) on the declared date (field F1): transaction report rejected (functional check R063).

New integrity check:

- If D2 is the MIC code of a regulated market or MTF reporting the transactions executed in its systems directly to the AMF (see list published on the AMF website in the "Transaction Reporting" section of the RCSI/RCCI area) and field G1 (nature of the operation) is completed with "A" (third-party): transaction report rejected (new functional check R061).

- If D2 is not the MIC code of a regulated market, an MTF or an equivalent system outside the EEA: transaction report rejected (new functional check R079, which rejects a few MIC codes indicated in the ISO list but which do not correspond to a trading venue).

❑ **Field D3: direction of the operation for the reporting entity**

Integrity checks:
- If D3 <> ("B", "S"): transaction report rejected (functional check R029).

❑ **Field D4: quantity of securities / contracts / nominal amounts traded**

The quantity traded must always be expressed as the number of securities or contracts traded or as a nominal amount (see 7.6). However, in the interests of harmonisation with the format recommended by the CESR, this field will be filled out with 5 decimal places, even if the quantity is a whole number.

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Examples:
  ➢ Purchase of 253 securities: D4 = "00000000000253.00000"
  ➢ Purchase of a nominal amount of €1,000,000: D4 = "000000001000000.00000"

Integrity checks:
  ➢ If the character in 15th position of field D4 is not a point ".": transaction report rejected (functional check R030).
  ➢ If D4 is negative or zero: transaction report rejected (functional check R031).

❏ **Fields D5 and D6: price type and currency type**

Field D5: price type

For prices expressed as a percentage, this field should be filled out with "PCT"
For prices expressed in monetary units, this field should be filled out with "PIE"

Field D6: price currency

For values expressed in monetary units: the price currency must be filled out using the ISO 4217 standard in 3 alphanumeric characters. Further information about the ISO 4217 standard is available on the website of the International Organization for Standardisation (ISO) at the following address http://www.iso.org/iso/en/prods-services/popstds/currencycodeslist.html

For values expressed as a percentage: this field must remain empty

Integrity checks:
  ➢ If D5 <> ("PIE", "PCT"): transaction report rejected (functional check R032).
  ➢ If D5 = "PCT" and D6 is not empty: transaction report rejected (functional check R035).
  ➢ If D5 = "PIE" and D6 is not a valid currency code (ISO 4217 standard): transaction report rejected (functional check R036).

❏ **Field D7: Unit price**

Details on the format
This field must be filled out with 8 decimal places, even if the trade price contains fewer decimal places.

If the transaction is concluded at a price containing more than 8 decimal places, the said price must be rounded off to the eighth decimal place applying commercial rounding off rules. E.g.
  ⇒ 100.111123455 becomes 100.11112346
  ⇒ 100.111123454 becomes 100.11112345

Examples:

➢ Share traded at a price of 30 EUR: D7 = "00000000030.00000000"

➢ Bond traded at a price of 101.25% (expressed as a percentage): D7 = "00000000101.25000000". Reminder: the expected price is the "clean price" (as a % without accrued interest).

➢ CAC40 index future 10 EUR, traded at the price of 4754 (expressed in index points) with a multiplier of 10 EUR: D7 = "00000047540.00000000"

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Integrity checks:
  ➢ If the character in 12th position in field D7 is not a point: transaction report rejected (functional check R037).
  ➢ If D7 is negative or zero: transaction report rejected (functional check R038).

❑ **Field D8: total amount of the transaction**

Details on the format

This field must be filled out with 5 decimal places, even if the amount traded contains fewer decimal places.

E.g.
  ➢ Purchase of 100 shares at a price of 35.27 EUR: D8 = "00000000003527.000000"

Integrity checks:
  ➢ If the character located in 15th position in field D8 is not a point: transaction report rejected (functional check R039).
  ➢ If D8 is negative or zero: transaction report rejected (functional check R040).

NB: field D8 can be left blank when the transaction concerns a financial contract; it must never be completed with 0 (otherwise the report is rejected by check R040).

Integrity cross-checks:
  ➢ If D8 is empty when the transaction was not executed on a derivatives market: transaction report rejected (functional check R041).
  ➢ If there is an inconsistency between the D4 "quantity", D7 "price" and D8 "amount" declared: transaction report rejected (functional check R044).
  ➢ If there is an inconsistency between the D4 "quantity", D7 "price" and D8 "amount" declared (with a different price currency from the amount currency): transaction report rejected (nouveau functional check R045).

❑ **Field D9: currency of the amount**

This field specifies the currency in which the total amount of the transaction indicated in field D8 is expressed. It is obligatory to complete this field (ISO standard 4217 with 3 alphanumeric characters) in a manner that is consistent with field D8. Further information about the ISO 4217 standard is available on the website of the International Organization for Standardisation (ISO) at the following address http://www.iso.org/iso/en/prods-services/popstds/currencycodeslist.html

Integrity check:
  ➢ If D9 is not a valid currency code: transaction report rejected (except for derivatives) (functional check R042).

Integrity cross-check:
  ➢ If D9 is not empty and D8 is empty: transaction report rejected (functional check R043).

❑ **Field D10: unique report identifier**

This field must be completed with the unique internal reference of the transaction report in the systems of the entity issuing the report. This reference must never be repeated over time and must allow the audit trail to be traced back to the operation recorded in the reporting firm systems.

It is indispensable for managing cancellations/modifications, and for monitoring by the AMF of the recycling of rejected transactions.

Integrity check:
> If D10 is empty: transaction report rejected (functional check R001).

Integrity cross-checks:
> If several reports are transmitted on the same day with the same D10 identifier (duplication),they are all rejected (functional check R900)
> If a cancellation report has the same D10 identifier as a report that has already been integrated and cancelled in the AMF systems, it will be rejected (functional check R901)
> If a cancellation report has a D10 identifier that does not correspond to any previous report that has been integrated* into the AMF systems, it will be rejected (functional check R902)
> If D10 is equal to field D10 of a transaction report already received by the AMF from the same issuing entity, and the present report is not a cancellation or a modified transaction report: transaction report rejected (cf. cancellation / modification :management mechanism in the detailed description for field H1) (functional check R903).

* Production upgrade as of July 2011: the sequence number of the files transmitted in the course of a given day is now taken into account in the cancellation management algorithm.

NB:

- A report that is rejected by functional check R900 **must be recycled**[2] (single copy) since duplicate reports are all rejected (there is no way of knowing which report is valid).
- A report rejected by functional check R901 **does not need to be recycled** (the cancellation of the report has already been taken into account).
- A report rejected by functional check R902 **must be recycled** (unless the initial transaction report was never sent).
- A report rejected by functional check R903 **does not need to be recycled** (it has already been integrated).

❑ **Field D11: Quantity type**

Field D11 specifies the type of quantity (field D4). The possible terms for field D11 are:
> UNT: quantity expressed as a number of securities,
> FMT: quantity expressed as a nominal amount.

Integrity check:
> If D11 <> "UNT" or "FMT", or empty: transaction report rejected (new functional check R033).

Integrity cross-check:
> If D11= "FMT" and D5 <> «PCT »: transaction report rejected (new functional check R034).

NB: for bond transactions for which the quantity is expressed as a nominal amount, this must be expressed in the same currency as the total amount of the transaction (field D8).

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[2] Meaning reissued to the RDT system, after correction if necessary (cf. 7.14).

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❑ **Fields E1 and E2: identity of the counterparty**

Field E1 specifies the reference standard used to identify the counterparty in field E2 depending on its nature. The possible entries for fields E1 and E2 are therefore as follows:

E1	E2	Nature of the counterparty
"BIC"	BIC 11 code	ISP from the EEA or branch of an ISP from the EEA (or a financial intermediary from outside the EEA possessing a BIC code)
"MIC"	MIC code	Regulated market or MTF
"CND"	Empty	Non-reportable counterparty
"IND"	Empty	Case of a transaction on own account for which execution is delegated to a third party

Attention to the case of an OTC derivative transaction for which the "IND" code is not admitted.

OTC Derivatives

Integrity checks:
  ➢ If E1 <> (BIC, MIC, CND, IND): transaction report rejected (functional check R050).
  ➢ If E1 = BIC and E2 is not a valid BIC code: transaction report rejected (functional check R051).
  ➢ If E1 = MIC and E2 is not a valid MIC code: transaction report rejected (functional check R053).
  ➢ If E1 = CND or E1 = IND and E2 is not empty: transaction report rejected (functional check R047).
  ➢ E1 = CND and D1 <> OTC: transaction report rejected (functional check R048).
  ➢ If inconsistency between D2 "trading venue" and E2: transaction report rejected (functional check R054).

  ➢ If E1 = BIC and E2 is not a market counterparty: transaction report rejected (new functional check R052, which rejects certain BIC codes referenced in the SWIFT directory but which do not correspond to a market counterparty).
  ➢ E1 = IND only for transactions on own account with an intermediary; transactions executed as a member of this market do not need to be reported via RDT (exemption) (new functional check R060).
  ➢ E1 = MIC only for transactions executed on a regulated market or an MTF with anonymous operators (new functional check R049).
  ➢ If E1 = BIC and D2 <> a market without anonymity of operators: transaction report rejected (new functional check R077 and R078)

❑ **Fields F1 and F2: timing of the transaction**

Examples:
  ➢ 2007-11-05 for 5 November 2007.
  ➢ 09:15:27 for 9.15am and 27 seconds

Integrity checks:
  ➢ If F1 is not a valid date (incorrect format or future date): transaction report rejected (functional check R005).
  ➢ If F2 is not a valid time (incorrect format or default time): transaction report rejected (functional check R006).
  ➢ If F1 > date of the day: transaction report rejected (functional check R055)

❑ **Field F3: theoretical settlement date**

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Integrity check:
- ➤ If F3 is not a valid date (incorrect format): transaction report rejected (functional check R056).
- ➤ If F3 is empty for a transaction which was not executed on a derivatives market: transaction report rejected (functional check R057).

Integrity cross-check:
- ➤ If F3 < F1 (trading date): transaction report rejected (functional check R058).

❑ **Field G1: nature of the operation**

Integrity check:
- ➤ If G1 <> "P" or "A": transaction report rejected (functional check R028).

Integrity cross-check:
- ➤ If E1 = IND and G1 = A: transaction report rejected (functional check R046)*.

* The type of counterparty (E1) must only be reported as IND for intermediated transactions on own account.

❑ **Field H1: cancellation flag**

If the transaction report being transmitted is not a cancellation, this field must be marked "N".

To cancel a transaction report previously sent to and integrated by the AMF system, a cancellation report identical to the initial transaction report should be sent, in particular containing the same unique transaction identifier (field D10), but with the cancellation flag marked as "O".

To modify a transaction report previously sent to and integrated by the AMF system, 2 reports must be sent:

- ➤ a cancellation report identical to the initial transaction report, in particular containing the same unique transaction identifier (field D10), but with the cancellation flag marked as "O"

- ➤ a modified transaction report containing the same unique transaction identifier (field D10) as the initial report and with the cancellation flag marked as "N".

Case of rejected reports
If a transaction report is rejected by the AMF system, a corrected report with the same unique transaction identifier (field D10) as the initial report should be sent as quickly as possible. However, there is no need to send a cancellation report.

Modifications not concerning information transmitted to the AMF
To the extent possible, only corrections to information transmitted in reports to the AMF should give rise to corrective reports. Modifications recorded in the securities system of the reporting firm but concerning an indicator that is not transmitted to the AMF (e.g. operator code) should not give rise to the transmission of corrective reports.

Integrity check:
- ➤ If H1 <> (O, N): transaction report rejected (functional check R059).

More details are provided on the procedure for reporting cancellations and corrections in Paragraph 7.14.

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❑ **Fields I1 and I2: Others**

Field I1 (filler) is a free zone to allow for future upgrades of transaction reporting without bringing into question the structure file as a whole.

Field I2 marks the end of each record by a carriage return. This character is used as a separator between two records.

Business
Technical

8.3. Examples of records

Financial instruments admitted to trading on a RM or an MTF in the EEA

As an example for 5 cases among the most frequent, the content of the expected reports in presented below:

Case n°1

ISP A buys 485 STE GLE 6.2%97 TSR stocks (ISIN code FR0000572521) from ISP B. The 2 ISPs operate on their own accounts and the transaction is executed over the counter on 5 January 2008 at 9.05am and 08 seconds, at a price excluding accrued interest of 101.35%. The two ISPs agree on settlement on 12 January 2008. The total amount of the transaction, including the accrued interest, is 513.96 EUR.
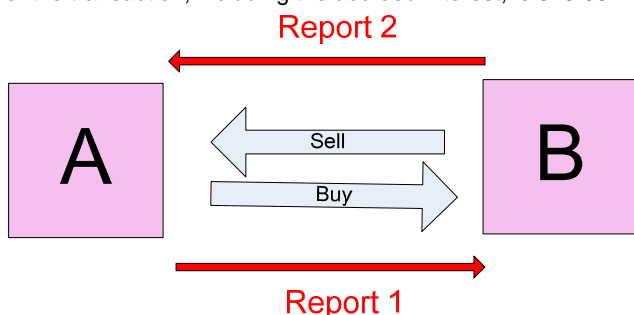
ISP A has chosen to handle its own reporting of the transactions it executes (without delegating to a third party). ISP B, meanwhile, has delegated its RDT reporting to ISP C. The expected transaction reports are as follows:

Field N°	Field name	Report by ISP A	Report by ISP B
1	Record type	D1	D1
A1	Reporting firm identifier type	BIC	BIC
A2	Reporting firm identifier	PSIAFRPPXXX~~~~	PSIBFRPPXXX~~~~
B1	Issuing entity identifier type	~~~	BIC
B2	Issuing entity identifier	~~~~~~~~~~~~~~~	PSICFRPPXXX~~~~
C1	Security code type	ISN	ISN
C2	Security code	FR0000572521~~~~~~~~ (…)	FR0000572521~~~~~~~~(…)
D1	Trading venue code type	OTC	OTC

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Field N°	Field name	Report by ISP A	Report by ISP B
D2	Trading venue	XOFF~~~~~~~~~~	XOFF~~~~~~~~~~~
D3	Direction of operation for reporting firm	B	S
D4	Quantity of securities / contracts traded	0000000000485.00000	0000000000485.00000
D5	Price type	PCT	PCT
D6	Price currency	~~~	~~~
D7	Unit price	00000000101.35000000	00000000101.35000000
D8	Total amount of the transaction	0000000000513.96000	0000000000513.96000
D9	Currency of the amount	EUR	EUR
D10	Unique report identifier	BF000412ZA~~~~~~~~~~~ ~~~~~~~~~~~~~(…)	PSIB0001~~~~~~~~~~~~~ ~~~~~~~~~~~(…)
E1	Counterparty identifier type	BIC	BIC
E2	Counterparty identifier	PSIBFRPPXXX~~~~	PSIAFRPPXXX~~~~
F1	Trading date	2008-01-05	2008-01-05
F2	Trading time	09:05:08	09:05:08
F3	Theoretical settlement date	2008-01-12	2008-01-12
G1	Nature of the operation	P	P
H1	Cancellation flag	N	N
I1	Filler	~~~~~~~~~~~~~~~(…)	~~~~~~~~~~~~~~~(…)
I2	End of record		

Case n°2

ISP A, an asset management company, buys 485 STE GLE 6.2%97 TSR stocks (ISIN code FR0000572521) for the account of one of its clients from ISP B. ISP B operates on its own account and the transaction is executed over the counter on 5 January 2008 at 9.05am and 08 seconds, at a price of 101.35% excluding accrued interest. The two counterparties agree on settlement on 12 January 2008. The total amount of the transaction, including the accrued interest, is 513.96 EUR.
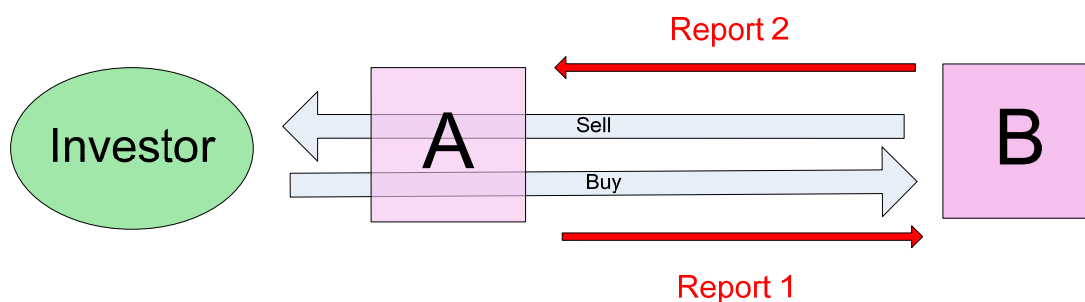
Asset management company A has chosen to handle its own reporting of the transactions it executes. ISP B, meanwhile, has delegated its RDT reporting to ISP C. The expected transaction reports are as follows:

Field N°	Field name	Report by ISP A	Report by ISP B
1	Record type	D1	D1
A1	Reporting firm identifier type	BIC	BIC

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Field N°	Field name	Report by ISP A	Report by ISP B
A2	Reporting firm identifier	PSIAFRPPXXX~~~~	PSIBFRPPXXX~~~~
B1	Issuing entity identifier type	~~~	BIC
B2	Issuing entity identifier	~~~~~~~~~~~~~~~	PSICFRPPXXX~~~~
C1	Security code type	ISN	ISN
C2	Security code	FR0000572521~~~~~~~~ (…)	FR0000572521~~~~~~~~ (…)
D1	Trading venue code type	OTC	OTC
D2	Trading venue	XOFF~~~~~~~~~~	XOFF~~~~~~~~~~
D3	Direction of operation for reporting firm	B	S
D4	Quantity of securities / contracts traded	0000000000485.00000	0000000000485.00000
D5	Price type	PCT	PCT
D6	Price currency	~~~	~~~
D7	Unit price	00000000101.35000000	00000000101.35000000
D8	Total amount of the transaction	0000000000513.96000	0000000000513.96000
D9	Currency of the amount	EUR	EUR
D10	Unique report identifier	BF000412ZA~~~~~~~~~~~~ ~~~~~~~~~~~(…)	PSIB0002~~~~~~~~~~~~~~ ~~~~~~~~~~~(…)
E1	Counterparty identifier type	BIC	BIC
E2	Counterparty identifier	PSIBFRPPXXX~~~~	PSIAFRPPXXX~~~~
F1	Trading date	2008-01-05	2008-01-05
F2	Trading time	09:05:08	09:05:08
F3	Theoretical settlement date	2008-01-08	2008-01-08
G1	Nature of the operation	A	P
H1	Cancellation flag	N	N
I1	Filler	~~~~~~~~~~~~~~~(…)	~~~~~~~~~~~~~~~(…)
I2	End of record		

Case n°3

ISP A and ISP B both execute a transaction on an MTF (MIC code "XSMN") in which they are acting for the account of their respective clients (Investor 1 is the buyer and Investor 2 is the seller). The transaction executed on 5 January 2008 at 9.05am and 08 seconds concerns 150 Alcatel shares (code ISIN FR0000130007) at a price of 35.654 EUR. Trading is anonymous on this MTF and therefore the counterparty is the MTF as far as ISP A and B are concerned. Settlement is standard at D+3. The gross amount of the transaction is 5348.10 EUR.

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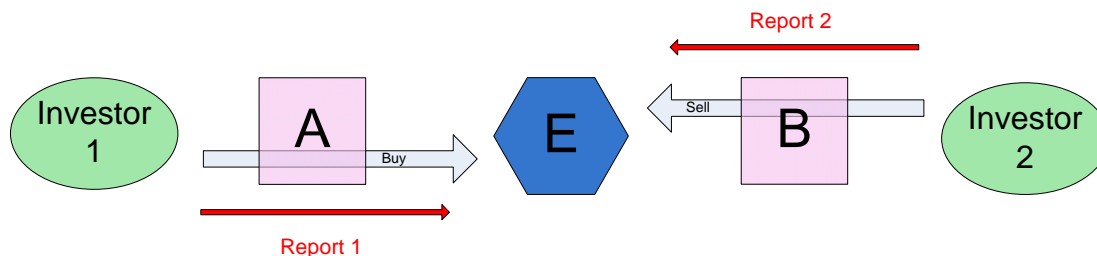ISP A has chosen to handle its own reporting of the transactions it executes. ISP B, meanwhile, has delegated its RDT reporting to ISP C. The expected transaction reports are as follows:

Field N°	Field name	Report by ISP A	Report by ISP B
1	Record type	D1	D1
A1	Reporting firm identifier type	BIC	BIC
A2	Reporting firm identifier	PSIAFRPPXXX~~~~	PSIBFRPPXXX~~~~
B1	Issuing entity identifier type	~~~	BIC
B2	Issuing entity identifier	~~~~~~~~~~~~~~~	PSICFRPPXXX~~~~
C1	Security code type	ISN	ISN
C2	Security code	FR0000130007~~~~~~~~ (…)	FR0000130007~~~~~~~~ (…)
D1	Trading venue code type	MIC	MIC
D2	Trading venue	XSMN~~~~~~~~~~	XSMN~~~~~~~~~~
D3	Direction of operation for reporting firm	B	S
D4	Quantity of securities / contracts traded	0000000000150.00000	0000000000150.00000
D5	Price type	PIE	PIE
D6	Price currency	EUR	EUR
D7	Unit price	00000000035.65400000	00000000035.65400000
D8	Total amount of the transaction	0000000005348.10000	0000000005348.10000
D9	Currency of the amount	EUR	EUR
D10	Unique report identifier	BF000413ZA~~~~~~~~~~~~~~~~~~~~~~~~~~(…)	PSIB0003~~~~~~~~~~~~~~~~~~~~~~~~~~(…)
E1	Counterparty identifier type	MIC	MIC
E2	Counterparty identifier	XSMN~~~~~~~~~~	XSMN~~~~~~~~~~
F1	Trading date	2008-01-05	2008-01-05
F2	Trading time	09:05:08	09:05:08
F3	Theoretical settlement date	2008-01-08	2008-01-08
G1	Nature of the operation	A	A
H1	Cancellation flag	N	N
I1	Filler	~~~~~~~~~~~~~~~(…)	~~~~~~~~~~~~~~~(…)
I2	End of record		

Case n°4

ISP A is operating on its own account between two investors: Investor 1 wants to buy 485 STE GLE 6.2%97 TSR stocks (ISIN code FR0000572521) and Investor 2 wants to sell his stocks. Although they are practically simultaneous, there are in fact two distinct transactions executed on 5 January 2008 by ISP A: a purchase at 2.30pm and 50 seconds at a price of 101.35% followed by a sale at 2.32pm and 10 seconds at a price of 101.50%. Delivery is set for 8 January 2008.

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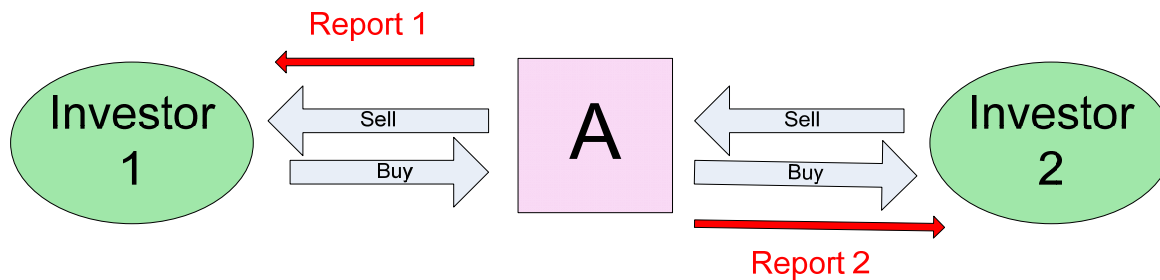
ISP A has chosen to handle its own reporting of the transactions it executes. The expected transaction reports are as follows:

Field N°	Field name	Déclaration N° 1 du PSI A	Déclaration N°2 du PSI A
1	Record type	D1	D1
A1	Reporting firm identifier type	BIC	BIC
A2	Reporting firm identifier	PSIAFRPPXXX~~~~	PSIAFRPPXXX~~~~
B1	Issuing entity identifier type	~~~	~~~
B2	Issuing entity identifier	~~~~~~~~~~~~~~~	~~~~~~~~~~~~~~~
C1	Security code type	ISN	ISN
C2	Security code	FR0000572521~~~~~~~~ (…)	FR0000572521~~~~~~~~ (…)
D1	Trading venue code type	OTC	OTC
D2	Trading venue	XOFF~~~~~~~~~~~	XOFF~~~~~~~~~~~
D3	Direction of operation for reporting firm	B	S
D4	Quantity of securities / contracts traded	0000000000485.00000	0000000000485.00000
D5	Price type	PCT	PCT
D6	Price currency	~~~	~~~
D7	Unit price	00000000101.35000000	00000000101.50000000
D8	Total amount of the transaction	0000000000513.96000	0000000000515.42000
D9	Currency of the amount	EUR	EUR
D10	Unique report identifier	BF000414ZA~~~~~~~~~~~~~~~~~~~~~~~~~(…)	BF00045AZA~~~~~~~~~~~~~~~~~~~~~~~~(…)
E1	Counterparty identifier type	CND	CND
E2	Counterparty identifier	~~~~~~~~~~~~~~~	~~~~~~~~~~~~~~~
F1	Trading date	2008-01-05	2008-01-05
F2	Trading time	14:30:50	14:32:10
F3	Theoretical settlement date	2008-01-08	2008-01-08
G1	Nature of the operation	P	P
H1	Cancellation flag	N	N
I1	Filler	~~~~~~~~~~~~~~~~(…)	~~~~~~~~~~~~~~~~(…)
I2	End of record		

Case n°5

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ISP A wants to buy 485 STE GLE 6.2%97 TSR stocks (ISIN code FR0000572521) on its own account, and delegates execution of the transaction to ISP B, a member of the regulated market identified by its MIC code XREG. The transaction is executed on that market on 5 January 2008 at 2.30pm and 50 seconds.
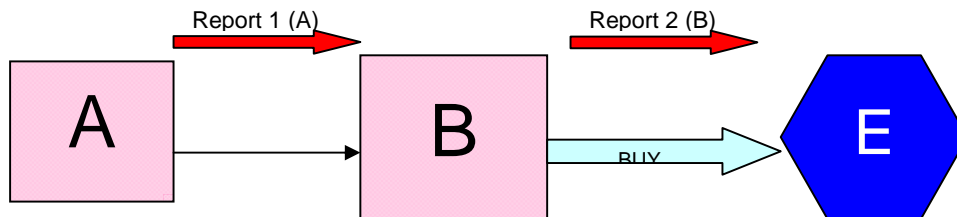

ISP A and ISP B have chosen to handle their own reporting of the transactions they execute. The expected transaction reports are as follows:

Field N°	Field name	Report by ISP A	Report by ISP B
1	Record type	D1	D1
A1	Reporting firm identifier type	BIC	BIC
A2	Reporting firm identifier	PSIAFRPPXXX~~~~	PSIBFRPPXXX~~~~
B1	Issuing entity identifier type	~~~	~~~
B2	Issuing entity identifier	~~~~~~~~~~~~~~~	~~~~~~~~~~~~~~~
C1	Security code type	ISN	ISN
C2	Security code	FR0000572521~~~~~~~~ (…)	FR0000572521~~~~~~~~ (…)
D1	Trading venue code type	MIC	MIC
D2	Trading venue	XREG~~~~~~~~~~	XREG~~~~~~~~~~
D3	Direction of operation for reporting firm	B	B
D4	Quantity of securities / contracts traded	0000000000485.00000	0000000000485.00000
D5	Price type	PCT	PCT
D6	Price currency	~~~	~~~
D7	Unit price	00000000101.35000000	00000000101.35000000
D8	Total amount of the transaction	0000000000513.96000	0000000000513.96000
D9	Currency of the amount	EUR	EUR
D10	Unique report identifier	BF000416ZA~~~~~~~~~~~~~ ~~~~~~~~~~~(…)	PSIB000234~~~~~~~~~~~~~ ~~~~~~~~~~~(…)
E1	Counterparty identifier type	IND	MIC
E2	Counterparty identifier	~~~~~~~~~~~~~~~	XREG
F1	Trading date	2008-01-05	2008-01-05
F2	Trading time	14:30:50	14:30:50
F3	Theoretical settlement date	2008-01-08	2008-01-08
G1	Nature of the operation	P	A
H1	Cancellation flag	N	N
I1	Filler	~~~~~~~~~~~~~~~(…)	~~~~~~~~~~~~~~~(…)
I2	End of record		

NB:

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- The header and end of file records are not shown
- The " ~ " symbols represent ASCII "spaces" (decimal code 20)
- The "   " symbol represents the ASCII carriage return (decimal code 13)

9. Production monitoring and report compliance control

9.1. Description of the automated report control process

Each day, the AMF carries out technical and functional checks on each file transmitted and each report entered to identify any inconsistent or incomplete transaction reports (giving rise to alerts or rejections).

To this effect, processing of the reports transmitted by RDT is launched each day at around midnight and comprises three stages:

> **1st stage: technical checks**

The purpose of the technical checks is to verify that the structure of the files received complies with the description given above.

Any discrepancies detected at this stage may result in the whole file being rejected.

E.g.
- abnormal record length
- inconsistency between the record counter (field FF5) and the number of records contained in the file
- non compliance with file-naming rules

The 27 existing technical checks with their related rejection codes are listed in the annex in 10.1

> **2nd stage: functional checks**

The functional checks are of several kinds:
- checks on the terms admitted for each field
- consistency checks between several fields in the report
- consistency checks between information reported via RDT and information received by the AMF from other sources

The main checks that are performed are described for each field in Paragraph 8.2.5 (see "Integrity checks").

Most of the checks are likely to result in non-compliant transaction reports being rejected. However, certain checks may give rise simply to an alert in the feedback file, or even to an alert remaining internal to the AMF system and not visible to the reporting firm.

The AMF reserves the right to transform existing alerts into rejections, and to add new checks if necessary. Also, the fact a report has not been rejected should not be considered as being an absolute guarantee of the compliance of the reports transmitted with the regulations, as certain reporting errors cannot be detected by computer.

The functional controls giving rise to a transaction report rejection, with the related rejection codes, are listed in the annex in 11.2. Functional controls giving rise to an alert in the feedback, with the related alert codes, are listed in the annex in 11.3.

9.2. Resources supplied to reporting firms by the AMF.

9.2.1. Feedback file

Technical

A feedback file is placed at the disposal of issuing entities that report via RDT*F in two different formats:

- ➢ A feedback file in text format: feedback_trading date.txt
- ➢ A feedback file in XML format: feedback_trading date.xml (cf. Annex in 10.)

NB: the content of the «.txt » file has been modified to make it easier to understand; it is also more complete in that it contains the details of the reports for which there are alerts. However, to enable institutions to adapt gradually to this new feedback, the former feedback entitled "feedback.txt" will continue to be generated until the end of 2011. During this transition period, there will therefore be 3 feedback files placed at the disposal of institutions (2 ".txt" and 1 ".xml").

They are updated daily by the AMF and contain a report on processing by the RDT system of the files received the previous day. They can be retrieved at the initiative of the issuing entity via SFTP for RDT*F, by following the procedure described in the technical guide.

The feedback file supplies statistics on the reports received and states the cause of any rejections there might have been further to technical and functional checks.

The text file comprises the following 6 blocks:

- ➢ Number of files received and rejected per reception date (technical checks)
- ➢ Rejected files - Detail (technical checks)
- ➢ Number of reports received, rejected and with alerts per accepted file
- ➢ Rejected reports - Detail per file (functional checks)
- ➢ Reports integrated with alerts - Statistics (functional checks)
- ➢ Reports integrated with alerts - Detail (functional checks)

Important: in addition to analysing feedback files, institutions are invited to contact the AMF regularly to obtain extractions from reports (rejected and/or integrated) over a given period for self-monitoring purposes. To do so, just send an e-mail to the address rdt@amf-france.org stating the RDT login used and the target extraction period.

Business

9.3. Reporting firm responsibility

It is the responsibility of the entity issuing the transaction reports (direct or delegated reporting, or a reporting system authorised by the AMF) to analyse the content of the feedback file daily using one of the two methods described above, in order to correct and return any reports that might have been rejected by the AMF collection system as quickly as possible.

To this effect, it is stated that the RDT system (and more generally the SESAM application of which it is one of the modules) has the capacity to collect and process a very large number of reports (several million reports a day). However, when an institution needs to catch up on a large number of historic transactions, the AMF should be informed in advance (par mail à rdt@amf-france.org).

When the reporting firm delegates reporting to a third party in accordance with Article 315-48, Paragraph I, Point 2 of the AMF General Regulation, the reporting firm remains responsible for the content of the information transmitted to the AMF.

10. XML FILE STRUCTURE

10.1. Case of a full file rejection

```xml
<?xml version="1.0" encoding="ISO-8859-1"?>
<FeedBackRDT                                    xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
xsi:noNamespaceSchemaLocation="RDT_FDB1.1.xsd"
 NomPSI="RDTLOGIN01" DateTraitement="2010-12-30"  DateReception="2010-08-18" Version="1.1">
 <FichierStats>
   <StatFichiersRecus Nb="1"/>
   <StatFichiersRejetes  Nb="1"/>
 </FichierStats>
 <FichierDetails>
   <FichiersRejetes>
     <FichierRejeteDetails>
       <Nom><![CDATA[LOGINRDT0120100818.1.SFTP]]></Nom>
       <CodeRejet>T004</CodeRejet>
       <LibelleRejet><![CDATA[Pb fichier<A0>: fichier vide]]></LibelleRejet>
     </FichierRejeteDetails>
   </FichiersRejetes>
 </FichierDetails>
</FeedBackRDT>
```

10.2. Case of 2 files integrated but with report alerts

```xml
<?xml version="1.0" encoding="ISO-8859-1"?>
<FeedBackRDT                                    xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
xsi:noNamespaceSchemaLocation="RDT_FDB1.1.xsd"
 NomPSI="RDTLOGIN01" DateTraitement="2010-12-30"  DateReception="2010-08-18" Version="1.1">
 <FichierStats>
   <StatFichiersRecus Nb="2"/>
   <StatFichiersRejetes  Nb="0"/>
 </FichierStats>
 <FichierDetails>
   <FichiersAcceptes>
     <FichierAccepteDetails>
       <Nom><![CDATA[ LOGINRDT0120100818.1.SFTP ]]></Nom>
       <DclStats>
         <StatDclRecues Nb="2"/>
         <StatDclRejetes Nb="0"/>
         <StatDclEnAlerte Nb="2"/>
       </DclStats>
       <DclDetails>
         <Alertes>
           <AlerteDetails>
             <Code>F24</Code>
```

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```
                <Libelle><![CDATA[Le type ref contrepartie (E1) vaut CND pour 100% des déclarations OTC reçues ce
jour. If la contrepartie est un PSI, elle doit être identifiée par son code BIC. A vérifier et corriger le cas
échéant.]]></Libelle>
                <Nb>2</Nb>
                <DclListe>
                  <Dcl><![CDATA[ABCDEFG123]]></Dcl>
                  <Dcl><![CDATA[ABCDEFG1234]]></Dcl>
                </DclListe>
              </AlerteDetails>
            </Alertes>
          </DclDetails>
        </FichierAccepteDetails>
        <FichierAccepteDetails>
          <Nom><![CDATA[LOGINRDT0120100818]]></Nom>
          <DclStats>
            <StatDclRecues Nb="6"/>
            <StatDclRejetes Nb="0"/>
            <StatDclEnAlerte Nb="4"/>
          </DclStats>
          <DclDetails>
            <Alertes>
              <AlerteDetails>
                <Code>F24</Code>
                <Libelle><![CDATA[Le type ref contrepartie (E1) vaut CND pour 100% des déclarations OTC reçues ce
jour. Si la contrepartie est un PSI, elle doit être identifiée par son code BIC. A vérifier et corriger le cas
échéant.]]></Libelle>
                <Nb>4</Nb>
                <DclListe>
                  <Dcl><![ ABCDEFG1235]]></Dcl>
                  <Dcl><![ ABCDEFG12356]]></Dcl>
                  <Dcl><![ ABCDEFG123567]]></Dcl>
                  <Dcl><![ ABCDEFG1235678]></Dcl>
                </DclListe>
              </AlerteDetails>
            </Alertes>
          </DclDetails>
        </FichierAccepteDetails>
      </FichiersAcceptes>
    </FichierDetails>
</FeedBackRDT>
```

11. LIST OR REJECTION AND ALERT CODES

11.1. List of technical rejection codes

Rejection code	Name	Remark
T001	The ISP login present in the file name is not valid.	If the 10-character RDT identifier (format: LOGINRDT01) in the file name is not that of the reporting entity recorded in the AMF databases : whole

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Rejection code	Name	Remark
		file rejected.
T001.1	The ISP login present in the file name is different from the connection login.	If the 10-character RDT identifier (format: LOGINRDT01) in the file name is different from the login of the connection with the RDT system: whole file rejected.
T002	The file name format is not the following: 1 point in 19[th] position.	If the 19[th] character composing the file name is not a "." (point): whole file rejected.
T003	The file name does not contain a date between the 11[th] and 18[th] positions or a figure between 1 and 999 after the point.	If the date between the 11th and 18th characters composing the file name is not in YYYYMMDD format: whole file rejected. If the 20[th] character composing the file name is not a figure between 1 and 999: whole file rejected.
T004	File pb: file empty	If the body of the file between the header and the end of file record is empty: whole file rejected.
T005	Header pb: Record type incorrect (field 1).	If the letter "E" (header) is not followed by an ASCII space: whole file rejected.
T006	File pb: no footer.	If the file sent does not have an end of file record: whole file rejected.
T007	Header pb: incorrect length: instead of 33 + carriage return.	If the file header does not comply with the number of 33 characters, i.e. "E LOGINRDT01YYYY-MM-DDhh:mm:ss001" + a carriage return: whole file rejected.
T008	Header pb: incorrect length: at least 450 characters instead of 33 + carriage return.	If there is other data on the line supposed to contain only the header: whole file rejected.
T009	Header pb: technical identifier (ET1) wrong.	If the 10-character RDT identifier (format: LOGINRDT01) is not that of a reporting entity registered in the databases of the AMF: whole file rejected.
T010	Header pb: the creation date (ET2) is not valid.	If the file creation date does not comply with the ISO 8601 standard: YYYY-MM-DD : whole file rejected
T011	Header pb: the creation time (ET3) is not valid.	If the file creation time does not comply with the ISO 8601 standard: hh :mm :ss: whole file rejected
T012	Header pb: file number not valid (ET4).	If several files display the same sequence number for the same entity for the same trading day (00h00 to 23h59): whole file rejected.
T013	Header pb: the file number must be between 1 and 999	If the number of the file on the date of creation is not between 1 and 999: whole file rejected.
T014	Pb in body of file: record type incorrect (field 1)	If special characters or any other character do not comply with the nomenclature required by the RDT system: whole file rejected. Field 1 = D1 if the report concerns a transaction on a listed instrument admitted to trading on a RM or an MTF in the EEA.
T014.1	Record type incorrect, reports on OTC derivatives are not admitted (field 1)	Field 1 = D2 if the report concerns a transaction on a single-name OTC derivative the underlier of which is a financial instrument admitted to trading on a RM in the EEA. OTC Derivatives
T015	Pb in body of the file: incorrect length: instead of 377 + carriage return.	If one of the lines (dedicated to the transaction reports) is not composed of 377 characters (spaces included) + and a carriage return: whole file rejected.
T016	Pb in body of the file: incorrect length: at least 450 characters instead of 377 + carriage return.	If one of the lines (dedicated to the transaction reports) is composed of more than 377 characters (spaces included) + a carriage return: whole file rejected.
T017	Footer pb: Record type incorrect (field	If the letter "F" (end) is not followed by an ASCII space: whole file

Rejection code	Name	Remark
	1).	rejected.
T018	Footer pb: incorrect length: au lieu de 41 + carriage return.	If the end of file record does comply with the number of 41 characters, i.e. F LOGINRDT01YYYY-MM-DDhh:mm:ss00100000000 » + a carriage return: whole file rejected.
T019	Footer pb: incorrect length: at least 450 characters instead of 41 + carriage return.	If there is other data on the line supposed to be composed only of the end of file record: whole file rejected.
T020	Footer pb: technical identifier (FF1) wrong.	If the 10-character RDT identifier (format: LOGINRDT01) is not that of the reporting entity recorded in the databases of the AMF: whole file rejected.
T021	Footer pb: the creation date (FF2) is not valid.	If the file creation date does not comply with the ISO 8601 standard: YYYY-MM-DD: whole file rejected.
T022	Footer pb: the creation time (FF3) is not valid.	If the file creation time does not comply with the ISO 8601 standard: hh :mm :ss: whole file rejected.
T023	Footer pb: the file number must be between 1 and 999	If the number of the file on the date of creation is not between 1 and 999: whole file rejected.
T024	Footer pb: file number not valid (FF4).	If several files display the same sequence number for the same entity for the same trading day (00h00 to 23h59): all files rejected.
T025	Footer pb: record counter (FF5) inconsistent with file content.	If the number of lines (dedicated to transaction reports) composing the body of the file is different from the number contained in the end of file record: whole file rejected.
T026	File rejection: several files with the same number (ET4).	If several files display the same sequence number for the same entity for the same trading day: whole file rejected.
T027	The file number in the header is different from that present in the file name	If the sequence number in the header is different from the sequence number indicated in the file name: whole file rejected.
T028	The file creation date in the header is different from that in the footer.	If the creation date indicated in the file header is different from that indicated in the footer: whole file rejected.

11.2. List of functional rejections

Rejection code	Remark
R001	Unique report identifier (D10) not filled out.
R002	Record type (field 1) not valid
R003	Reporting firm identifier type (A1) or reporting firm code (A2) not filled out.
R004	Reporting firm identifier type (A1) different from "BIC".
R005	Field F1 (Transaction date) must be a date in YYYY-MM-DD format.
R006	Field F2 (Transaction time) must be a time in HH :MI :SS format.
R007	Declarations dated more than 4 years previously are not accepted by the RDT system.
R008	Reporting firm identifier type (A1) or reporting firm code (A2) not referenced.
R009	Issuing entity identifier type (B1) not filled out and issuing entity identifier (B2) filled out.
R010	Issuing entity identifier type (B1) filled out and issuing entity identifier (B2) not filled out.
R011	Issuing entity identifier type (B1) incorrect.
R012	Issuing entity identifier type (B1) or issuing entity identifier (B2) not referenced by the AMF.
R013	The identity of the issuing entity (B1-B2) must only be completed if different from the identity subject to reporting requirements (A1-A2).

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Rejection code	Remark	
R014	The issuing identity identified in B1-B2 is not authorised to transmit reports via this channel (ET1) for this reporting firm (A1-A2).	
R015	Security type code (C1) not valid.	
R015.1	For an over the counter transaction on OTC derivatives, the expected security code type is "XXX".	OTC Derivatives
R016	Security code type (C1) must only be indicated as LOC for transactions on listed derivatives that do not possess an ISIN code.	
R017	Security code (C2) not filled out.	
R018	ISIN code (field C2) not valid.	
R020	For an over the counter transaction on a listed instrument, the expected trading venue is "XOFF".	
R020.1	For an over the counter transaction on OTC derivatives, the expected trading venue (D2) is "XXXX".	OTC Derivatives
R021	Trading venue code type (D1) incorrect.	
R021.1	The standard identifying the trading venue must be filled out as "OTC" for an over the counter transaction on OTC derivatives.	OTC Derivatives
R023	The BIC code indicated in field D2 (trading venue) is not that of a valid systematic internaliser on the indicated trading date (F1).	
R024	The trading venue (D2) is not valid on the indicated trading date (F1).	
R025	The security code type (field C1) is "ISN" when the MIC code indicated in field D2 is that of a regulated market for which use of an AII code is obligatory.	
R026	The security code type (field C1) is "LOC" when the MIC code indicated in field D2 is that of a regulated market for which use of an ISIN code is obligatory.	
R027	The first component of the AII code (MIC code at the beginning of field C2 is not the MIC code of a regulated market for which use of the AII code is authorised.	
R028	Nature of the operation (G1) not filled out or not valid.	
R029	Direction of the operation (D3) not valid.	
R030	Field D4 (quantity of securities traded) must be numerical (14.5).	
R031	The quantity of securities traded (D4) is negative or zero.	
R032	Price type (D5) not valid.	
R033	The quantity type (field D11) must be indicated as FMT if the quantity is expressed as a nominal amount and as UNT or be left empty otherwise.	
R034	The quantity may only be expressed as a nominal amount (field D11 = FMT) if the price is expressed as a % (field D5 = PCT).	
R035	Price currency filled out when price type = 'PCT'.	
R036	The price currency (D6) is not valid.	
R037	Field D7 (price) must be numerical (11.8).	
R038	The price of the reported transaction (D7) is negative or zero.	
R039	Field D8 (amount) must be numerical (14.5).	
R040	The amount of the transaction (D8) is negative or zero.	
R041	The amount of the transaction (D8) not filled out for a transaction that was not executed on a derivatives market.	
R042	The currency of the amount (D9) is not valid.	
R043	The currency of the amount field (D9) is filled out when the total amount field of the transaction (D8) is empty.	
R044	Inconsistency between the quantity (D4), price (D7) and amount (D8) reported.	
R045	Inconsistency between the quantity (D4), price (D7) and amount (D8) reported (NB: Price currency different from the currency of the amount).	
R046	The counterparty identifier type (E1) must only be filled out as IND for transactions on own account with an intermediary, or nature of the operation (G1) is A (third party).	
R048	The counterparty identifier type (E1) must only be filled out as CND for OTC transactions where	

Rejection code	Remark
	the counterparty cannot be declared.
R047	Counterparty identifier (E2) not empty when the counterparty identifier type (E1) is CND or IND.
R049	The counterparty identifier type (E1) must only be filled out as MIC for transactions executed on a regulated market or MTF.
R050	The counterparty identifier type empty or incorrect.
R051	The counterparty identifier (E2) is not a valid BIC11 code.
R052	The counterparty identifier (field E2) is not the BIC code of a market counterparty.
R053	The counterparty identifier (E2) is not a valid MIC code.
R054	Inconsistency between the trading venue (D2) and counterparty identity (E2).
R055	Trading date (F1) > current date.
R056	Field F3 (theoretical settlement date) must be a date in YYYY-MM-DD format.
R057	Theoretical settlement date (F3) not filled out for a transaction that was not executed on a derivative market.
R058	Theoretical settlement date (F3) < Trading date (F1).
R059	Cancellation flag (H1) incorrect.
R060	Field E1 must be IND for intermediated own account transactions and transactions executed as a member of this market are not to be reported via RDT (exemption).
R061	Institutions acting as RTO are not subject to reporting requirements and transactions executed as a member of this market are not to be reported via RDT (exemption).
R062	The transactions executed as a member on MTS France are not to be reported via RDT (exemption).
R063	No operation was executed on this security (C2) on Euronext (D2) on the reported date (F1).
R066	The first component of the AII code (at the beginning of field C2) is not consistent with the trading venue indicated in field D2.
R067	The second component of the AII code (product code in position 5 in field C2) is not filled out.
R068	The second component of the AII code (product code in position 5 in field C2) contained special characters that are not authorised.
R069	The third component of the AII code (derivative type in position 17 in field C2) is not valid (O and F are the only values authorised).
R070	The fourth component of the AII code (option type in position 18 in field C2) is not valid (C, P and F are the only values authorised).
R071	The third and fourth components of the AII code (derivative type and option type in positions 17 and 18 in field C2) are not consistent (OC, OP and FF are the only authorised combinations).
R072	The fifth component of the AII code (maturity date in position 19 in field C2) is not a date in YYYY-MM-DD format.
R073	The maturity date indicated in the AII code (position 19 in field C2) is prior to the trading date indicated in field F1.
R074	The sixth component of the AII code (strike price in position 29 in field C2) is filled out when the derivative type is F.
R075	The sixth component of the AII code (strike price in position 29 in field C2) must be strictly positive if the derivative type is O.
R076	The sixth component of the AII code (strike price in position 29 in field C2) is not in the expected format (13.5).
R077	The counterparty of a transaction executed on a market with no anonymity must be identified by its BIC code (fields E1 and E2).
R078	The counterparty of the transaction is identified by a BIC code when the trading venue indicated in field D2 corresponds to an anonymous market.
R079	The trading venue (field D2) is filled out with an MIC code that does not correspond to a regulated market, an MTF or an equivalent system outside the EEA.
R080	The ISIN code (ISO 6166 standard) of the underlying asset (field C3) of the OTC derivative is not

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Rejection code	Remark
	filled out.
R081	The ISIN code (ISO 6166 standard) of the underlying asset (field C3) of the OTC derivative is not a valid ISIN code.
R082	The derivative type (field C5) is obligatory for over the counter transactions on OTC derivatives.
R083	The derivative type (field C5) must be filled out as "O", "W", "F", "D", "X", "S", "Z", "K" according to the type of product concerned by the transaction.
R084	The Markit code (field C4) must be filled out only to identify the reference bond of a CDS.
R086	The option type code (field C6) must be filled out as "C" for "call" contracts and "P" for "put" contracts.
R087	The price multiplier (field C7) must comply with the expected format (14.5), i.e. 14 figures and 5 decimals.
R088	The price multiplier (field C7) must be strictly positive.
R089	The strike price (field C8) must comply with the expected format (14.5), i.e. 14 figures and 5 decimals.
R090	The strike price (field C8) must be strictly positive
R091	The maturity date (field C9) must comply with the YYYY-MM-DD format
R092	The maturity date (field C9) cannot be less than the trading date (field F1)
R900	Duplication on the unique report identifier (D10).
R901	The report has already been cancelled.
R902	Report to be cancelled not found.
R903	A report with the same identifier D10 has already been sent in a previous file.

11.3. List of alerts provided in the feedback

Alert Code	Name
F00	The report was transmitted more than 2 business days after the trade.
F01	The trading time indicated in the report in Field F2 is equal to midnight: check the time and correct as necessary.
F02	The reporting entity and the counterparty are identical. This reporting rule may only be used for portfolio matching operations.
F03	The difference between the trading date and settlement date is more than 8 days. Temporary security transfers and exercise of options are not to be declared via RDT
F07	All the OTC reports received today on listed instruments have the same trading time: check the time and correct as necessary.
F07.1	All the OTC reports received today on OTC derivatives have the same trading time: check the time and correct as necessary.
F20	The quantity indicated in field D4 is not a whole number: check and correct as necessary.
F21	The amount of the transaction indicated in field D8 is strictly greater than an adjustable threshold: check and correct as necessary.

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F22	The unit price indicated in field D7 is strictly greater than an adjustable threshold: check and correct as necessary.	
F23	The unit price indicated in field D7 is strictly less than an adjustable threshold: check and correct as necessary.	
F24	The counterparty identifier type (E1)=CND for 100% of the OTC reports on listed instruments received today. If the counterparty is an ISP, it must be identified by its BIC code. To be checked and corrected as necessary.	OTC derivatives
F24.1	The counterparty identifier type (E1)= CND for 100% of the OTC reports on OTC derivatives received today. If the counterparty is an ISP, it must be identified by its BIC code. To be checked and corrected as necessary.	
F25	The reporting firm identifier (field A2) is not a valid BIC code on the indicated trading date (F1).	
F26	The issuing entity identifier (field B2) is not a valid BIC code on the indicated trading date (F1).	
F27	An OTC transaction for which the trading time is before 8am or after 8pm. To be checked and corrected as necessary.	
F36	Field C6 (option type code) is obligatory for this type of derivative	
F37	Field C6 (option type code) must not be completed for this type of derivative.	
F38	Field C7 (price multiplier) is obligatory for this type of derivative.	
F39	Field C7 (price multiplier) must not be completed for this type of derivative.	
F40	Field C8 (strike price) is obligatory for this type of derivative.	
F41	Field C8 (strike price) must not be completed for this type of derivative.	
F42	Field C9 (Expiration date) is obligatory for this type of derivative.	

OTC Derivatives

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12. GUIDANCE TO REPORT TRANSACTION ON OTC DERIVATIVES INSTRUMENTS

Date: June 2010
Ref.:   CESR/10-661

Guidance to report transactions on OTC derivative instruments

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TREM	The Transaction Reporting Exchange Mechanism that allows CESR members to exchange transaction reports.
MAD	Market Abuse Directive (2003/6/EC), OJ L 96/16 12.4.2003
MiFID	Markets in Financial Instruments Directive (2004/39/EC), OJ L 145, 30.4.2004, p.1.
MiFID Level 2 Regulation	Commission Regulation (EC) No. 1287/2006 of 10 August 2006 implementing Directive 2004/39/EC of the European Parliament and the Council as regards record-keeping obligations for investment firms, transaction reporting, market transparency, admission of financial instruments to trading, and defined terms for the purpose of that Directive, OJ L 241, 2.9.2006, p.1,
MTF	A Multilateral Trading Facility as defined in Article 4 (15) of MiFID. It is a multilateral system, operated by an investment firm or market operator, which brings together multiple third-parties buying and selling interests in financial instruments.
OTC derivative	A derivative instrument which is traded over-the-counter where the value of the instrument is derived from or otherwise dependent on the value of a debt or equity security instrument or instruments that are admitted to trading on a regulated market.
Regulated market or RM	A Regulated Market as defined in Article 4 (14) of MiFID.
CFI	Classification of Financial Instruments - ISO standard 10962 The CFI code is a 6 characters code that classifies an instrument. The official CFI code of the instrument can only be allocated by a National Numbering Agency. However, it is authorized to use the standard to generate "unofficial" CFI codes for instruments.
AII	Alternative Instrument Identifier This identifier is used to identify exchange traded derivatives on certain markets where those markets have elected to identify the instruments admitted to trading on their markets using the AII code rather than the ISIN code (see below). The code is composed of six characteristics or data fields of the contract: market code, exchange product code, strike price, expiration date, derivative type, put/call.
ISIN	International Securities Identification Numbers - ISO standard 6166 The ISIN code is a 12 alphanumeric code that identifies uniquely a single instrument. ISIN codes are allocated, in each country, by a National Numbering Agency (NNA).
NNA	National Numbering Agency The NNA of a country is in charge of allocating CFI and ISIN codes to instruments according to the relevant ISO standards.
ANNA	Association of National Numbering Agency The ANNA is the international body that coordinates the work of the National Numbering Agencies (NNA).

I. Introduction

A. Transaction reporting in Europe

Competent authorities ("CAs") throughout the European Economic Area are committed to detecting market abuse and maintaining the integrity of their markets. The receipt and examination of transaction reports are essential elements in enabling CAs to detect market abuse and the Market in Financial Instrument Directive (MiFID) gives CAs the power and obligation to collect transaction reports on instruments admitted to trading on regulated markets. However, many CAs have noted that there are a range of OTC (over the counter) financial instruments that mirror instruments admitted to trading on regulated markets that can equally be used for the purposes of market abuse. Some CAs extended the collection of transaction reports to include OTC instruments whose value is derived from instruments admitted to trading on a regulated market to enhance their ability to detect suspicious activity and maintain the integrity of their markets. Many other competent authorities are currently investigating this option as well.

B. The Transaction Reporting Exchange Mechanism

CESR implemented an IT system in November 2007 to facilitate the exchange of transaction reports amongst regulators. The system, called the Transaction Reporting Exchange Mechanism (TREM), was built based on the request from the MiFID level 2 Regulation to organize the exchange of transaction reports amongst European financial regulators.

TREM is currently limited to the scope of the MIFID Level 2 regulation, e.g. exchange of transaction reports on instruments admitted to trading on Regulated Markets in Europe. After one and a half years of running and observing the different practices within CESR membership, CESR decided to amend TREM to facilitate the exchange of transaction reports on OTC derivative instruments amongst CESR members.

C. CESR work on the field of transaction reporting on OTC derivative instruments

This document takes into account CESR's decision on the technical standards for classification and identification of OTC derivative instruments for the purpose of the exchange of transaction reports amongst CESR member (via TREM) (Ref. CESR/09-1036) and the feedback statement on CESR's consultation on this guidance (Ref. CESR/09-768).

CESR acknowledges that other initiatives are running in parallel in this area and that the OTC market is an extremely dynamic market. Hence, these guidelines will be changed and/or replaced by new ones when necessary, depending on the future outcomes of parallel studies and the evolution of the market. These guidelines will be updated according to the protocol settled in ref. CESR/10-663.

D. Scope of Transaction Reporting on OTC derivative instruments

CESR decided that only transactions on securities derivatives whose underlying instrument is traded on a regulated market should be exchanged. This excludes indices or baskets of securities, apart from derivatives where all the underlying securities are issued by the same entity; e.g. single name credit default swaps. Please note that a basket starts with two financial instruments (firms should not abuse this by constructing a basket to in effect represent just one instrument).

In line with the above, CESR decided to exchange transactions on the following OTC derivatives:
1. Options
2. Warrants
3. Futures
4. Contract for Difference and Total Return Swap

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5. Spreadbets
6. Swaps (except CfDs, TRS and CDS)
7. Credit Default Swap
8. Complex derivatives

CESR decided to go for a more comprehensive approach where derivatives that would not fall within plain-vanilla general categories would still be reported under a common "complex derivatives" label. The boundaries between "plain-vanilla" and "complex" derivatives will be further defined in this document.

This guidance sets out common standards for consistent collection of data from investment firms. It defines and explains, for each derivative instrument type, how the fields of transaction reports should be populated to represent in a harmonised manner the execution of a transaction on such instrument.

The following examples are provided to help clarify the types of OTC derivatives that will become reportable by investment firms. It should be noted that the ultimate underlying instrument of the OTC derivative is a key element that determines whether a derivative is reportable or not. Essentially, if the value of the OTC derivative is dependent upon the performance of a single security or the risk of a single issuer, any transaction in that instrument by an investment firm is reportable.

Please not that these examples are not exhaustive but rather concentrate on relevancy.

Transactions on the following instruments are **reportable**:
- a credit default swap on single issuer
- a swap between the performance of an index at a given date and the performance of a single stock (although the derivatives refers to a multi-component index, it also refers to a single-name)
- a swap between the performance of two different stocks
- debt swaps
- a dividend swap

Transactions on the following instruments are **not reportable**:
- a future or option on an index
- a future or option on a basket (with at least two securities)
- a swap between two indices
- a future, forward or option on a commodity, interest rate or foreign exchange rate
- a swap between two interest rates
- a volatility swap
- a CDS with no reference entity admitted to trading on a regulated market (e.g. CDS on a loan)
- Some structured products that are not admitted to trading on a EU regulated market (and thus not reportable, like Euro Medium Term Notes) are designed in practice through combining different derivatives transactions, some of them OTC. It is expected that the underlying OTC contracts will be reported, for so far these contracts meet the requirements for reporting OTC derivative transactions
- a transaction on a derivative that is solely admitted to trading on a MTF or platform and not on a regulated market is not subject to reporting as an OTC derivative

E. The transaction reporting fields

In order to avoid interfering with local requirements already implemented in Member States, the following section concentrates **only** on the fields which are specifically impacted by the OTC derivative instruments. There are a number of other fields in the Annex 1 of the MiFID Level 2 Regulation. The reporting guidance of these other fields should remain unchanged in the case of reporting of transaction on OTC derivatives.

Buy/Sell Indicator

Annex 1 definition – *Identifies whether the transaction was a buy or sell from the perspective of the reporting investment firm, or in the case of a report to a client, of the client.*

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Standard - A single alpha character, 'B' or 'S' should be used to identify whether the transaction was a buy or sell from the reporting firm's perspective.

OTC derivative specific requirement – In general, the above standard applies.

Instrument Identification

Annex 1 definition   *This shall consist in:*
- *a unique code, to be decided by the competent authority (if any) to which the report is made identifying the financial instrument which is the subject of the transaction*
- *if the financial instrument in question does not have a unique identification code, the report must include the name of the instrument or, in the case of a derivative contract, the characteristics of the contract.*

OTC derivative specific requirement – This would be the six characteristics of the contract as decided in CESR decision on the technical standards on classification and identification of OTC derivatives for the purpose of exchange of transaction reports amongst CESR members:
1. Ultimate Underlying ISIN – this is the ISIN of the ultimate equity or bond instrument underlying the derivative. For example, if the derivative is an option on a future on a share (if exists), this is the ISIN of the share.
2. Derivative type – this is the classification of the OTC derivative instrument defined in this chapter. In the example above, this would be an option.
3. Put/call identifier – in case of an option.
4. Price multiplier.
5. Strike Price.
6. Expiration date.

These fields would be reported as separated fields.

If the OTC instrument has an ISIN code, the ISIN code of this instrument might be added. This is optional.

Unit Price

Annex 1 definition – *The price per security or derivative contract excluding commission and, (where relevant) accrued interest. In the case of a debt instrument, the price may be expressed in terms of currency or as a percentage.*

Standard – A numeric field expressing a price (unit price or percentage price), up to 19 characters, with the possibility of decimal representation should be used. Unit price must always be positive.

OTC derivative specific requirement – For options and warrants, and contrary to the Annex 1 definition, the market practice is to consider that the Unit price is the premium.

For example, if we consider a contract representing 200 shares and a premium of 2€, strictly following the annex 1, the Unit price field would be 400€ (2€ * 200 shares). However, Market practice is rather to define the Unit Price field as being the premium e.g. 2€.
CESR therefore considers that the Unit Price field should be filled in with 2€, i.e. the premium. The Price Multiplier would contain the number of underlying instruments per contract (e.g. 200 for this example).

Price Notation

Annex 1 definition – *The currency in which the price is expressed. If, in the case of a bond or other form of securitised debt, the price is expressed as a percentage, that percentage shall be included.*

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Standard – A three alpha character field using the ISO 4217 currency codes (the major currency should be used – eg Euros rather than cents). If the price is expressed as a percentage of nominal value, then the ISO 4217 code of the nominal value should be used.

OTC derivative specific requirement - In general, the above standard applies.

Quantity

Annex 1 definition – *The number of units of the financial instruments, the nominal value of bonds, or the number of derivative contracts included in the transaction.*

Standard – A numeric field, up to 19 characters, with the possibility of decimal representation should be used.

OTC derivative specific requirement - In general, the above standard applies.

Venue Identification

Annex 1 definition – *Identification of the venue where the transaction was executed. That identification shall consist in:*
- *where the venue is a trading venue; its unique harmonised identification code;*
- *otherwise the code 'OTC'*

OTC derivative specific requirement - The code 'XXXX' must be used in the trading venue field for OTC derivatives. This code is included in the ISO 10383 MIC Standards as 'No market – eg unlisted'. It should not be confused with the 'XOFF' identifier which is used for on-exchange instruments that trade "off market".

Derivative / Instrument type

Annex 1 definition – *The harmonised description of the derivative type should be done according to one of the top level categories as provided by a uniform internationally accepted standard for financial instrument classification.*

OTC derivative specific requirement - This would be one letter according to the following:
- Options,   O
- Warrants,   W
- Futures/forwards   F
- CfDs and TRS   D
- Spread bets,   X
- Swaps (other than CfDs, TRS and CDS),   S
- CDS,   Z
- Complex derivatives.   K

If other derivatives commonly reported as complex turn out to become new standards, new specific categories will be added in accordance with the revision protocol.

Ultimate Underlying Identification

Annex 1 definition – *The instrument identification applicable to the security that is the underlying asset in a derivative contract as well as the transferable security falling within Article 4(1)(18)(c) of Directive 2004/39/EC.*

OTC derivative specific requirement - This would be the ISO 6166 ISIN of the ultimate equity or bond instrument underlying the derivative. For example, if the derivative is an option on a future on a share, this is the ISIN of the share.

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Put/call identifier

Annex 1 definition – *Specification whether an option or any other financial instrument is a put or a call.*

Standard – A single alpha character field with the following possible values:
- C – call
- P – put

OTC derivative specific requirement - In general, the above standard applies.

Price multiplier

Annex 1 definition – *The number of units of the financial instrument in question which are contained in a trading lot; for example, the number of derivatives or securities represented by one contract.*

Standard – A numeric field, up to 19 characters, with the possibility of decimal representation should be used. This field must be populated for all derivative types and the value must be positive.

OTC derivative specific requirement - In general, the above standard applies.

Strike Price

Annex 1 definition – *The strike price of an option or other financial instrument.*

Standard – A 19 character numeric field that may contain up to 5 decimals. The strike price must be expressed in the major currency (eg Euros rather than cents). The strike price must be a positive value.

OTC derivative specific requirement - In general, the above standard applies.

Expiration date

Annex 1 definition – *The maturity date of a bond or other form of securitised debt, or the exercise date/maturity date of a derivative contract.*

Standard – The expanded ISO 8601 Date Format standard YYYY-MM-DD should be used for this field.

OTC derivative specific requirement - If the instrument (e.g. option, warrant, spread bet, swap) has multiple expiration dates, the latest expiration date should be populated.

Instrument description

Please note that this field is not exchanged between CESR members mainly due to language reasons, but CESR strongly recommends that the Instrument Description field should be required to be populated at local level, in order to explain the derivative being reported.

A free text field for instrument description will provide the local regulator with additional information about the transaction and will allow the local regulator to distinguish diverse instruments that might otherwise be grouped together under a single instrument code.

F. Population of fields per type of derivative

The following table presents the requirements in terms of population of fields above per type of derivative. It again concentrates only on the relevant fields as the other fields should always be populated.

	Options	Warrants	Futures	CfDs and TRS	Spread bets	Swaps (other than CfDs, TRS and CDS)	CDS	Complex derivatives
Put/call identifier	M	M	N	O	O	N	N	O
Price multiplier	M	M	M	O	O	M	N	O
Strike Price	M	M	N	O	O	N	O	O
Expiration date	M	M	M	O	O	M	O	O

Legend

M – The field should always be populated for this type of instrument.

O – The field might be populated for this type of instrument in some cases.

N – The field should not be populated for this type of instrument.

G. Reportable changes and events

Depending on the type of OTC derivatives, some events may offer to some parties to the contract the possibility to reduce, increase or cancel any exposure to the underlying. The CESR assessed whether these events could result in transactions that would be reportable from the perspective of preventing market abuse and concluded that in the following cases a transaction should be reported:

	Options	Warrants	Futures	CfDs and TRS	Spread bets	Swaps (other than CfDs, TRS and CDS)	CDS	Complex derivatives
Exercise / Closing	No (exercise)	No (exercise)	No (exercise)	Yes (closing)	Yes (closing)	N/A	N/A	N/A
Change in quantity	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Compression	N/A	N/A	N/A	N/A	N/A	N/A	No	N/A
Assignment	N/A	N/A	N/A	N/A	N/A	Yes	Yes	N/A
Early and partial terminations	Yes	Yes	Yes	N/A	N/A	Yes	Yes	Yes

Early terminations or closings would be reported as transactions in the other direction.

Modifications in the notional amount of an OTC derivative should be reported:

- as a new transaction with reference to the difference between the new amount and the former one,
- and NOT as a cancellation of the previous transaction together with the reporting of a transaction with the new total amount.

This is to allow regulators not to lose the information about the initial trade.

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II. OTC options

1) *Description of the instrument type*

An option contract gives the holder, in return for paying a premium to the option seller, the right to buy (call) or sell (put) a financial instrument during a given period. A significant volume of option trading takes place over-the-counter.

OTC options are options traded on the over-the-counter market, where participants can choose the characteristics of the options traded. The flexibility of these options is attractive to the participants as both parties can benefit from avoiding the restrictions that normal standardized exchanges place on options. The flexibility allows participants to achieve their desired position more precisely and cost effectively.

2) *Principles*

Put/call identifier

If this information is not known at the time of the transaction because, for example, the buyer can decide at a further stage whether it is a put or a call, the instrument is considered as a complex instrument and you should refer to chapter IX of this document.

3) *Example 2.1*

i. CONTEXT

An investment firm A buys 2000 contracts from investment firm B. The contracts are call options. Each contract represents 100 shares of France Telecom at a 17€ Strike Price, expiring on 31/10/09. The premium per share is 0.6€

ii. DATA

Field	Report from firm A	Report from firm B
Trading day	2009-09-17	2009-09-17
Trading time	15:35:21	15:35:21
Reporting firm identification	A	B
Counterparty code	B	A
Venue identification	XXXX	XXXX
Buy/Sell Indicator	B	S
Trading capacity	P	P
Quantity	2000	2000
Unit Price	0.6	0.6
Price Notation	EUR	EUR
Derivative type	O	O
Ultimate underlying identification	FR0000133308	FR0000133308
Put/call identifier	C	C
Price multiplier	100	100
Strike price	17	17
Expiration date	2009-10-31	2009-10-31

Instrument identification	

iii.   EXPLANATIONS

Ultimate Underlying identification
This is the ISIN code of France Telecom SA.

Unit Price
The unit price is the premium per share e.g. 0.6€.

4) Example 2.2

i.   CONTEXT

An investment firm A buys 2000 contracts from investment firm B. The contracts are call options. Each contract represents 100 shares of France Telecom at a 17€ Strike Price. The premium per share is 0.9€. However, the buyer of the option has the choice to exercise their options between three dates 28/02/10, 31/03/10 or 30/04/10.

ii.   DATA

Field	Report from firm A	Report from firm B
Trading day	2009-09-17	2009-09-17
Trading time	15:35:21	15:35:21
Reporting firm identification	A	B
Counterparty code	B	A
Venue identification	XXXX	XXXX
Buy/Sell Indicator	B	S
Trading capacity	P	P
Quantity	2000	2000
Unit Price	0.9	0.9
Price Notation	EUR	EUR
Derivative type	O	O
Ultimate underlying identification	FR0000133308	FR0000133308
Put/call identifier	C	C
Price multiplier	100	100
Strike price	17	17
Expiration date	2010-04-30	2010-04-30
Instrument identification		

iii.   EXPLANATIONS

Expiration date
As the option has multiple expiration dates, the latest expiration date is populated.

III. OTC Warrants

1) Description of the instrument type

OTC warrants are tradable long term call or put options, which give the holder the right to buy or sell a given number of units of underlying, usually shares in a company at a fixed price called the 'subscription price' at some future date - usually for a period of several years.

A warrant gives the holder the right to buy or sell the underlying at some predetermined date but the warrant holder is under no obligation to do so. Like options, warrants pay no interest or dividends and also like options, they have a substantial gearing effect.

Generally speaking, the price of a warrant tends to move up and down in line with the price of the underlying to which it is related. Warrants are often issued with new share issues to provide a geared incentive for new and existing investors. If the underlying shares fall substantially, the warrants are likely to be worthless.

For investors looking for higher than average returns and happy to take the extra risk, warrants can provide the answer.

2) Example 3.1

iv. CONTEXT

Investment firm A buys 200 warrants from B; each warrant gives the right to sell 100 shares of France Telecom at 17,50€, expiring 30 September 2014. The premium per share is 0,6€.

v. DATA

Field	Report from firm A	Report from firm B
Trading day	2009-09-17	2009-09-17
Trading time	13:30:36	13:30:36
Reporting firm identification	A	B
Counterparty code	B	A
Venue identification	XXXX	XXXX
Buy/Sell Indicator	B	S
Trading capacity	P	P
Quantity	200	200
Unit Price	0.6	0.6
Price Notation	EUR	EUR
Derivative type	W	W
Ultimate underlying identification	FR0000133308	FR0000133308
Put/call identifier	P	P
Price multiplier	100	100
Strike price	17.50	17.50
Expiration date	2014-09-30	2014-09-30
Instrument identification		

IV. OTC Futures / Forwards

3) Description of the instrument type

A future or forward contract gives its buyer the obligation to purchase the underlying asset and the seller to sell (and deliver) it at a preset price and date. If the futures/forward holder liquidates his position prior to expiration, the delivery clause is voided.

The growth of OTC derivatives trading has been fostered by the existence of liquid futures and options exchange markets in which the risks of the customized OTC instruments can be transferred to a broader marketplace.

The OTC futures/forward markets have developed in parallel to exchange traded futures markets whose characteristics can be standardised.

4) Example 4.1

vi. CONTEXT

Investment firm A buys 200 forward contracts from firm B; each forward contract relates to 100 bonds issued by Bekaert with maturity 31 December 2010 and a future price of 103.

vii. DATA

Field	Report from firm A	Report from firm B
Trading day	2009-09-17	2009-09-17
Trading time	13:30:36	13:30:36
Reporting firm identification	A	B
Counterparty code	B	A
Venue identification	XXXX	XXXX
Buy/Sell Indicator	B	S
Trading capacity	P	P
Quantity	200	200
Unit Price	103	103
Price Notation	EUR	EUR
Derivative type	F	F
Ultimate underlying identification	BE0002160266	BE0002160266
Put/call identifier		
Price multiplier	100	100
Strike price		
Expiration date	2010-12-31	2010-12-31
Instrument identification		

V. Contracts for Difference (CfDs)[3]

5) *Description of the instrument type*

A CfD on a share is a derivative product that gives the holder an economic exposure, which can be long or short, to the change in price of a specific share over the life of the contract. Contracts are normally open-ended, and can be closed out by the CfD holder on demand. The contract does not give the holder either ownership of the referenced shares or any ownership rights, such as voting rights. As the contract is normally cash-settled, it does not usually create any right to take delivery of the shares in place of cash settlement. Contracts for difference offer all the benefits of trading shares without having to physically own them. Contracts for difference mirror the performance of a share or an index. When applied to equities, such a contract is an equity derivative that allows investors to speculate on share price movements.

Contracts for difference allow investors to take long or short positions, and unlike futures contracts usually have no fixed expiry dates, standardised contract or contract size. Trades are conducted on a leveraged basis with margins typically ranging from 5% to 30% of the notional value for CfDs on leading equities. Because contracts for difference trade on margin, investors only need a small proportion of the total value of a position to trade.

One of the basic characteristics of a CfD is that the investor is able to gain an economic exposure to a movement in the referenced share at a small fraction of the cost of securing a similar exposure by acquiring the shares themselves. CfD contracts generally require the investor to lodge an initial margin payment of no more than 5%-30% with the CfD provider. So, in a case where a 10% margin is required, an investor putting up an initial deposit of €100 Euros may be able to enter into a CfD (long) position referenced to shares with a value (at the outset) of €1,000 Euros. However, since the writer of the CfD often hedges its risk by taking a corresponding position in the shares underlying the contract, it also needs to recover the financing charges it incurs (to support purchases that hedge a long CfD). The financing charge is typically calculated on a LIBOR + x basis (majority of CfDs written in UK).

CfDs also mirror any corporate actions that take place. CfD contracts usually provide for adjustments related to dividend payments and share issues (synthetic dividends and adjustments) that take place during the life of the contract. The owner of a share CfD will receive cash dividends and participate in stock splits.

CfDs enable investors to gain economic exposure to an equity without actually owning the equity itself. For the investor, it is extremely similar to investing in the equity but it enables the investor to gain leverage by only paying a margin on the investment. For example, an investor could buy 10,000 Vodafone shares on the LSE at £1-36 a share and would pay a total consideration of £13,600. Alternatively, the investor could gain the same exposure by buying 10,000 CfDs at £1-36, but instead of paying £13,600, the investor would only have to pay a margin percentage (e.g. 10% requiring an initial payment of £1,360). If Vodafone share price increased to £1-50, the investor could sell the CfD for £15,000 making a profit of £1,400. This is the same monetary profit as trading the equity, but the percentage profit would be 103% using CfDs but only 10.3% using the cash equity. Of course, if the share price had decreased, the CfD investor would have had to pay additional margin payments and the percentage loss would be far greater.

Where a CfD is based on an underlying instrument which itself has a number of units in a single trading lot e.g. a future contract, the number of CfDs should be populated in the Quantity field and the number of units contained in a single trading lot should be populated in the Price multiplier field e.g. the number of derivatives or securities represented by one contract.

6) *Example 5.1*

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[3] CfDs are also called 'equity total return swaps' by some market participants.

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viii. CONTEXT

Investment firm A buys 10 000 CfDs on Vodafone shares at 1.36 GBP from investment firm B.

ix. DATA

Field	Report from firm A	Report from firm B
Trading day	2009-09-01	2009-09-01
Trading time	09:30:10	09:30:10
Reporting firm identification	A	B
Counterparty code	B	A
Venue identification	XXXX	XXXX
Buy/Sell Indicator	B	S
Trading capacity	P	P
Quantity	10000	10000
Unit Price	1.36	1.36
Price Notation	GBP	GBP
Derivative type	D	D
Ultimate underlying identification	GB00B16GWD56	GB00B16GWD56
Put/call identifier		
Price multiplier		
Strike price		
Expiration date		
Instrument identification		

7) Example 5.2

x. CONTEXT

Investment firm A buys 10 000 Total Return Swaps on Vodafone shares at 1.36 GBP from investment firm B expiring on 16 December 2009.

xi. DATA

Field	Report from firm A	Report from firm B
Trading day	2009-09-01	2009-09-01
Trading time	09:30:10	09:30:10
Reporting firm identification	A	B
Counterparty code	B	A
Venue identification	XXXX	XXXX
Buy/Sell Indicator	B	S
Trading capacity	P	P
Quantity	10000	10000
Unit Price	1.36	1.36

Price Notation	GBP	GBP
Derivative type	D	D
Ultimate underlying identification	GB00B16GWD56	GB00B16GWD56
Put/call identifier		
Price multiplier		
Strike price		
Expiration date	2009-12-16	2009-12-16
Instrument identification		

VI. Spread Bets

8) Description of the instrument type

Spread bets are similar to CfDs in that they enable investors to gain economic exposure to a financial instrument without actually owning the financial instrument itself, while also offering leverage. Unlike CfDs, spread bets have an expiry date – usually on the futures quarterly cycle of March, June, September and December (although they can be closed out at any time).

Typically, a spread bet will allow the investor to 'bet' an amount of for every one point movement (normally one cent/penny) in the underlying stock. Using the same example as the CfDs, an investor could buy a June contract for £100 a penny movement in Vodafone plc at £1-36 (136p); the equivalent of 10,000 shares. If the price moved up and the spread betting firm offered a quote of 150 – 151, the investor could sell out the position at 150p and make £100 x (150-136) = £1400. As with the CfDs, the investor wouldn't be asked to pay £13,600 consideration, but also as with CfDs, the investor would pay around an initial 10% margin and the profits (or losses) would be far greater than the cash equity trade. Recent events in markets have resulted in some cases in dramatic increases in the % levels of margin requirements, even for large, liquid securities.

A transaction report is required for opening and closing a spread bet and for the expiration of a spread bet, with the exception of daily rolling spread bets (where only the initial opening and final closing transactions should be reported).

A spread bet on an option on an equity is not a complex derivative.

9) Principles

Unit Price
The Unit Price field should contain the reference/initial price for the transaction and should be in the currency of the underlying instrument.

Price Notation
The Price Notation field should reflect the currency of the spread bet – ie the currency of the quantity/stake, which may not necessarily be the currency of the underlying instrument.

Quantity
This is the amount 'bet' for each movement in the price of the underlying instrument.

Price Multiplier
The Price Multiplier field should only be populated when the spread bet is **not** based on a movement of one point (cent/penny).

Expiration Date
This is the final expiration date for the spread bet, unless it is a rolling bet.

10) Example 6.1

xii.   CONTEXT

Investment firm A buys a spread bet from investment firm B. The spread bet is for €100 for every cent movement in the price of Ryanair Holdings Plc from €3.30, the reference price for the transaction. The spread bet has no expiry date.

xiii.   DATA

Field	Report from firm A	Report from firm B
Trading day	2009-08-24	2009-08-24
Trading time	15:40:11	15:40:11
Reporting firm identification	A	B
Counterparty code	B	A
Venue identification	XXXX	XXXX
Buy/Sell Indicator	B	S
Trading capacity	P	P
Quantity	100.00	100.00
Unit Price	3.30	3.30
Price Notation	EUR	EUR
Derivative type	X	X
Ultimate underlying identification	IE00B1GKF381	IE00B1GKF381
Put/call identifier		
Price multiplier		
Strike price		
Expiration date		
Instrument Identification		

xiv.   EXPLANATIONS

Quantity
This is the amount of Euros 'bet' for every cent movement in the price of Ryanair i.e. €100.00.

Ultimate Underlying identification
This is the ISIN code for Ryanair Holdings Plc.

Unit Price
This is the reference price for Ryanair for the transaction i.e. €3.30.

Price Notation

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This is the currency of the spread bet i.e. Euro

Expiration Date
This is not populated as the spread bet does not have an expiry date.

Price Multiplier
This field is not populated as the spread bet is based on a movement of one point (cent).

11) Example 6.2

xv.   CONTEXT

Investment firm A buys a spread bet on a call option from investment firm B. The spread bet is for £100 for every penny movement in the premium of the Vodafone December 2010 140p call option, the reference price for the transaction. The spread bet expires on 18 December 2010.

xvi.   DATA

Field	Report from firm A	Report from firm B
Trading day	2009-10-24	2009-10-24
Trading time	15:40:17	15:40:17
Reporting firm identification	A	B
Counterparty code	B	A
Venue identification	XXXX	XXXX
Buy/Sell Indicator	B	S
Trading capacity	P	P
Quantity	100.00	100.00
Unit Price	0.10	0.10
Price Notation	GBP	GBP
Derivative type	X	X
Ultimate underlying identification	GB00B16GWD56	GB00B16GWD56
Put/call identifier	C	C
Price multiplier	100	100
Strike price	1.40	1.40
Expiration date	2010-12-18	2010-12-18
Instrument Identification		

xvii.   EXPLANATIONS

Quantity
This is the amount of GB Pounds 'bet' for every penny movement in the premium/price of the Vodafone December 2010 140p call option i.e. £100.00.

Ultimate Underlying identification
This is the ISIN code for Vodafone Plc.

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Unit Price
This is the premium/price of the Vodafone December 2010 140p call option.

Price Notation
This is the currency of the spread bet i.e. GB Pounds.

Strike Price
This is the strike price of the option

Expiration Date
This is the final expiration date for the Vodafone December 2010 140p call option and therefore the final date for the spread bet.

Price Multiplier
As this is a spread bet on an option, the number in this field represents the number of shares in one option contract i.e. 100 shares per contract.

12) Example 6.3

xviii. CONTEXT

Investment firm A buys a spread bet from investment firm B. The spread bet is for £100 for every cent movement in the price of Ryanair Holdings Plc from €3.30,, the reference price for the transaction. The spread bet has an expiration date of 31 December 2010.

xix. DATA

Field	Report from firm A	Report from firm B
Trading day	2010-10-24	2010-10-24
Trading time	15:40:17	15:40:17
Reporting firm identification	A	B
Counterparty code	B	A
Venue identification	XXXX	XXXX
Buy/Sell Indicator	B	S
Trading capacity	P	P
Quantity	100.00	100.00
Unit Price	3.30	3.30
Price Notation	GBP	GBP
Derivative type	X	X
Ultimate underlying identification	IE00B1GKF381	IE00B1GKF381
Put/call identifier		
Price multiplier		
Strike price		
Expiration date	2010-12-31	2010-12-31
Instrument Identification		

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xx. EXPLANATIONS

Quantity
This is the amount of GB Pounds 'bet' for every penny movement in the price of Ryanair i.e. £100.00.

Ultimate Underlying identification
This is the ISIN code for Ryanair Holdings Plc

Unit Price
This is the reference price for Ryanair for the transaction i.e. €3.30.

Price Notation
This is the currency of the spread bet rather than the currency of the underlying reference price - i.e. GBP rather than EUR.

Expiration Date
The spread bet has an expiration data of 31 December 2010.

Price Multiplier
This field is not populated as the spread bet is based on a movement of one point (cent).

VII. Equity and Debt Swaps

13) Description of the instrument type

An equity swap is an exchange of cash flows between two parties that allows each party to diversify its income, while still holding its original assets. The two sets of nominally equal cash flows are exchanged as per the terms of the swap, which may involve an equity-based (variable) cash flow that is traded for a fixed-income cash flow. The two cash flows are usually referred to as "legs" of the swap, one leg is usually pegged to a floating rate e.g. LIBOR, commonly referred to as the "floating leg". The other leg of the swap is based on the performance (total return) of either a share or a stock market index, commonly referred to as the "equity leg"

Apart from diversification, transaction costs and tax benefits, equity swaps allow large institutions to hedge specific assets or positions in their portfolios. In recent years equity swaps have emerged as one of a series of equity derivative products that are playing an increasingly integral part in how hedge funds gain exposure to global markets.

Equity swaps are conventionally documented under the International Swaps & Derivatives Association (ISDA) Master Agreement and schedules to that agreement. Under an equity swap, the `Equity Amount Payer' (as defined under ISDA documentation) will pay the economic return on the underlying security. This return is based on an agreed reference price and is paid at a specified reset date or dates. The Fixed Rate Payer (the other party to the equity swap) pays an amount based on a reference interest rate or a fixed rate. This amount accrues over the term of the swap.

If the total return on the equity leg of the swap is negative, the fixed interest leg party pays the amount of the decline in addition to the agreed interest payment. For the equity leg of the swap therefore, the total return on the underlying equity instrument matches the amount received from (or paid to) the fixed interest counterparty.

14) Principles

Unit Price

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This is the reference price of the underlying equity on which the equity returns are calculated.

When the initial reference price is not known when the Equity Swap is traded -because it depends on the performance of the stock price (i.e. mid prices, VWAP)-, then the Unit Price will be the closing price of the stock when the Equity Swap is traded, and later, when the real reference price is known, the information about the transaction is amended.

An Equity Swap should not be considered a Complex Derivative when the initial reference price is not known when the trade occurs.

Ultimate underlying identification
This field contains the specific information about the stock on which the equity returns are calculated.

Buy/Sell Indicator
The buyer of the Equity Swap should be the Fixed Rate Payer (the buyer is the one who receives the equity performance).

Quantity
The Quantity field should show the number of shares or notional amount subject to the agreement.
An Equity Swap with two equity legs should be reported with two different transaction reports (both counterparties to report both legs).

15) Example 7.1

xxi.   CONTEXT

On 16-09-09, firm A ('Equity Amount Payer') enters into a two-year, cash-settled, equity swap with firm B ('Fixed Rate Payer') whereby firm A agrees to pay at maturity the total performance of France Telecom stock (initial reference price: € 18.50) and receives quarterly the total performance of three-month LIBOR minus a spread. The number of shares subject to the swap agreement is 1 000 000, which results in a notional value of the equity swap of €18 500 000. Each quarter, firm B will pay the three-month LIBOR rate minus a spread, divided by four, multiplied by € 18.500.000 to firm A. At maturity, firm A will pay to firm B the total percentage positive price performance of France Telecom stock multiplied by € 18 500 000. Dividends will be paid to firm B when the investor receives them.

xxii.   DATA

Field	Report from firm A	Report from firm B
Trading day	2009-09-16	2009-09-16
Trading time	13:05:00	13:05:00
Reporting firm identification	A	B
Counterparty code	B	A
Venue identification	XXXX	XXXX
Buy/Sell Indicator	S	B
Trading capacity	P	P
Quantity	1000000	1000000
Unit Price	18.50	18.50
Price Notation	EUR	EUR
Derivative type	S	S
Ultimate underlying identification	FR0000133308	FR0000133308
Put/call identifier		
Price multiplier	1	1

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Strike price		
Expiration date	2011-09-16	2011-09-16
Instrument identification		

xxiii. *EQUITY SWAP DIAGRAM*
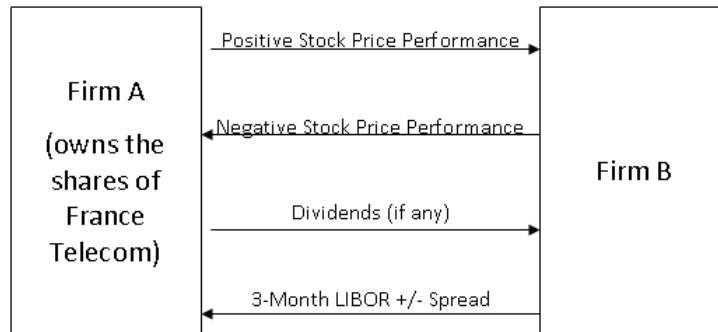
xxiv. EXPLANATIONS

Buy/Sell Indicator

The buyer of the Equity Swap (Buy/Sell Indicator, B) is the one who gets the risk of the price movement of the underlying (the Fixed Rate Payer and Equity Amount Receiver). So the seller (S) is the Equity Amount Payer and Fixed Rate Receiver

Unit Price

This is the reference price of France Telecom when the Equity Swap is traded.

Price Multiplier

This field must contain the number of underlying instruments that one contract represents. So, if one Equity Swap contract represents € 18.500.000, the number of shares covered by the swap is 1.000.000 (Quantity field) at the initial reference price of € 18.50 and the Price Multiplier is 1.

16) Example 7.2 (Equity Swap with two equity legs)

xxv. CONTEXT

Most equity swaps involve a floating leg and an equity leg, although some exist with two equity legs. Consider the following example:

On 16-09-09, firm A ('Equity Amount Payer') enters into a two-year, cash-settled, equity swap with firm B ('Fixed Rate Payer') whereby firm A agrees to pay at maturity the total performance of France Telecom stock (initial reference price: € 18.50) and receives quarterly the total performance of Telefonica (initial reference price: € 19). The number of shares subject to the swap agreement is 1 000 000, which results in a notional value of the equity swap of €18 500 000. At maturity, firm B will pay performance of Telefonica, divided by four, multiplied by € 18.500.000 to firm A, and firm A will pay to firm B the total positive price performance of France Telecom stock multiplied by € 18.500.000. Dividends will be paid to firm A (Telefonica) and to firm B (France Telecom) when the investor receives them.

An Equity Swap with two equity legs will be reported with two different transaction reports:

xxvi. DATA (TRANSACTION REPORT 1)

Field	Report from firm A	Report from firm B
Trading day	2009-09-16	2009-09-16
Trading time	13:05:00	13:05:00
Reporting firm identification	A	B
Counterparty code	B	A
Venue identification	XXXX	XXXX
Buy/Sell Indicator	S	B
Trading capacity	P	P
Quantity	1000000	1000000
Unit Price	18.50	18.50
Price Notation	EUR	EUR
Derivative type	S	S
Ultimate underlying identification	FR0000133308	FR0000133308
Put/call identifier		
Price multiplier	1	1
Strike price		
Expiration date	2011-09-16	2011-09-16
Instrument identification		

xxvii. DATA (TRANSACTION REPORT 2)

Field	Report from firm A	Report from firm B
Trading day	2009-09-16	2009-09-16
Trading time	13:05:00	13:05:00
Reporting firm identification	A	B
Counterparty code	B	A
Venue identification	XXXX	XXXX
Buy/Sell Indicator	B	S
Trading capacity	P	P
Quantity	973684	973684
Unit Price	19.00	19.00
Price Notation	EUR	EUR
Derivative type	S	S
Ultimate underlying identification	ES0178430E18	ES0178430E18
Put/call identifier		
Price multiplier	1	1
Strike price		
Expiration date	2011-09-16	2011-09-16
Instrument identification		

xxviii.   EQUITY SWAP DIAGRAM
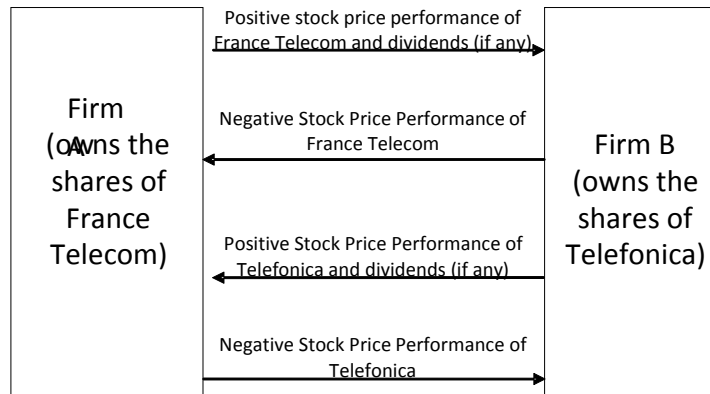
xxix.   EXPLANATIONS

<u>Buy/Sell Indicator</u>
The buyer of the Equity Swap (Buy/Sell Indicator, B) is the one who gets the risk of the price movement of the underlying.

<u>Unit Price</u>
This is the reference price of the underlying asset when the Equity Swap is traded.

<u>Price Multiplier</u>
This field must contain the number of underlying instruments that one contract represents. So if one Equity Swap contract represents € 18.500.000, the number of shares covered by the swap is 1.000.000 (Quantity) at the initial reference price of € 18.50 and the Price Multiplier is 1.

17) Example 7.3 (Debt Swap)

xxx.   CONTEXT

On 16-09-09, firm A ('Bond Performance Amount Payer') enters into a two-year, cash-settled, bond swap with firm B ('Fixed Rate Payer') whereby firm A agrees to pay at maturity the total performance of a specific Abertis bond (initial reference price 103.44 and ISIN code ES0211845211) and receives quarterly the total performance of three-month LIBOR minus a spread. The notional value of the bond swap is € 18.500.000. Each quarter, firm B will pay the three-month LIBOR rate minus a spread, divided by four, multiplied by € 18.500.000 to firm A. At maturity, firm A will pay to firm B the total percentage positive price performance of the Abertis bond multiplied by € 18.500.000.

xxxi.   DATA

Field	Report from firm A	Report from firm B
Trading day	2009-09-16	2009-09-16
Trading time	13:05:00	13:05:00
Reporting firm identification	A	B
Counterparty code	B	A

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Venue identification	XXXX	XXXX
Buy/Sell Indicator	S	B
Trading capacity	P	P
Quantity	18500000	18500000
Unit Price	103.44	103.44
Price Notation	EUR	EUR
Derivative type	S	S
Ultimate underlying identification	ES0211845211	ES0211845211
Put/call identifier		
Price multiplier	1	1
Strike price		
Expiration date	2011-09-16	2011-09-16
Instrument identification		

xxxii. DEBT SWAP DIAGRAM
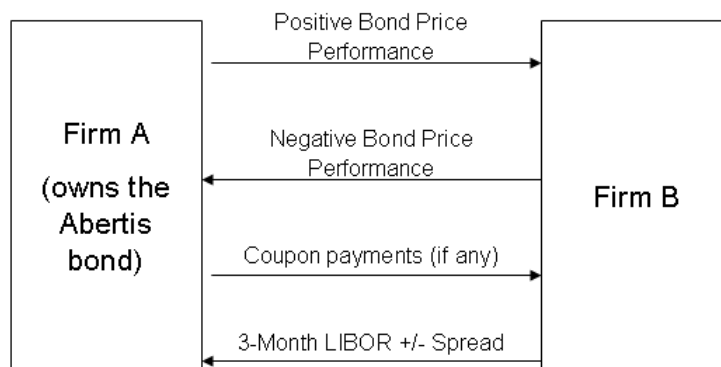
xxxiii. EXPLANATIONS

Buy/Sell Indicator
The buyer of the Debt Swap (Buy/Sell Indicator, B) is the one who gets the risk of the price movement of the bond. So the seller (S) is the Bond Performance Amount Payer and Fixed Rate Receiver.

Unit Price
This is the reference price of the Abertis bond when the Bond Swap is traded.

Price Multiplier
This field must contain the number of underlying instruments that one contract represents. So, one Debt Swap contract represents € 18.500.000 (Quantity field) at the initial reference price of € 103.44 and the Price Multiplier is 1.

18) Example 7.4 (Dividend swap)

xxxiv. CONTEXT

On 3 June 2010, firm A ('dividend payer') enters into a five-year, dividend swap with firm B ('Fixed Rate Payer') whereby firm A agrees to pay the actual quarterly dividends from Vodafone Group plc to firm B in return for a fixed rate quarterly payment. The notional value of the dividend swap is £14 million pounds with an initial reference price of

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£1.4 for the underlying stock implying a quantity of 10 million. Each quarter, firm A will pay firm B the equivalent actual quarterly dividend from 10 million Vodafone shares in return for the agreed fixed rate payment from firm B.

xxxv. DATA

Field	Report from firm A	Report from firm B
Trading day	2010-06-03	2010-06-03
Trading time	13:05:00	13:05:00
Reporting firm identification	A	B
Counterparty code	B	A
Venue identification	XXXX	XXXX
Buy/Sell Indicator	S	B
Trading capacity	P	P
Quantity	10000000	10000000
Unit Price	1.40	1.40
Price Notation	GBP	GBP
Derivative type	S	S
Ultimate underlying identification	GB00BI6GWD56	GB00BI6GWD56
Put/call identifier		
Price multiplier	1	1
Strike price		
Expiration date	2015-06-03	2015-06-03
Instrument identification		
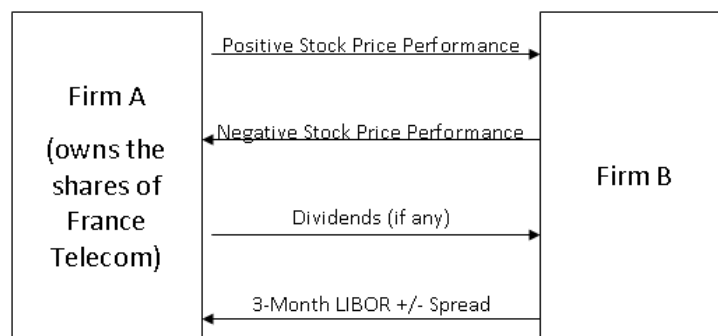
xxxvi. EXPLANATIONS

Buy/Sell Indicator
The buyer of the Dividend Swap (Buy/Sell Indicator, B) is the one who receives the equivalent actual dividend payments, so the seller (S) is the Dividend Payer and Fixed Rate Receiver

Unit Price
This is the reference price of Vodafone Group when the Dividend Swap is agreed.

Quantity

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This is the number of shares that are subject to the dividend swap agreement

VIII. Credit Default Swaps

19)Description of the instrument type

A credit default swap ("CDS") transfers the credit exposure of fixed income products between parties. The buyer of a credit swap receives protection against a default so that the risk is transferred from the holder of the fixed income security to the seller of the swap. In return for this protection, the buyer has to pay an interest rate a number of basis points above a 'riskless' benchmark. For example two parties enter into an agreement whereby one party (the buyer of the swap) pays the other a fixed periodic coupon for the specified life of the agreement. The other party (the writer) makes no payments unless a specified credit event occurs. Credit events are typically defined to include a material default, bankruptcy or debt restructuring for a specified reference asset. If such a credit event occurs, the party makes a payment to the first party, and the swap then terminates. The size of the payment is usually linked to the decline in the reference asset's market value following the credit event.

20)Principles

Unit price
There are various models for CDS pricing. The implementation of the "big bang protocol" has led to some standardization around the model of upfront payment + 100 bps or 500 bps coupons.

Firms should report the coupon in the Strike Price field and the initial payment (if any), expressed in basis points of notional, in the Unit Price field.

Price notation
The currency of the CDS (i.e. the currency in which the notional amount is denominated) should be reported in the "Price notation field".

Underlying instrument identification

A "reference obligation" is commonly defined for each CDS contract, which is often a bond of the issuer. It does not mean that the CDS only offers protection for credit events impacting the ability of the issuer to reimburse the holders of that specific bond. Nor do standard contracts refer to one specific obligation as being the only one deliverable in case of physical settlement. On the contrary, cash settlement has now become standard market practice. Besides, the reference obligation merely is used to define the seniority level of the debt protected by the CDS. Data providers display examples of possible reference obligations for a given issuer and a given seniority level, also indicating whether they are currently preferred for the purpose of CDS contracts referencing.

At first glance, it seems that the reference obligation chosen by the parties to a contract should be reported as the ultimate underlying instrument, since it is the only financial instrument formally related to the CDS. The ISIN of the reference bond should be reported for the identification of the ultimate underlying instrument. If there is more than one reference bond then the ISIN of one of the reference bonds should be used. If the reference entity has no issued bonds admitted to trading on a regulated market then the CDS is not reportable.

Market practice has evolved towards the direct exchange of "clips" which are the combination of an issuer code and a reference obligation code for a given seniority level. Since this is a major standard for exchanging CDS transaction data, this format has been considered for reporting to the regulators.

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For the initial period of the exchange of CDS transaction reports through TREM the Underlying Instrument field should be populated with an ISIN. TREM will be adapted to accept either an ISIN or the Markit clip (subject to agreement with Markit).

CESR will continue its work both with Markit and with firms to see whether the Markit code can be offered as a full alternative to the ISIN.

In all cases, the underlying instrument triggering the duty to report is the existence of a reference admitted to trading a regulated market obligation, since it is the only legal underlying.

<u>Scope of transactions to be reported</u>

Since there is no obligation for clearing CDS transactions at this stage, market practice has evolved to allowing some specific transactions that are commonly used as a proxy for clearing. Some of these should be reported for the purpose of market surveillance.

Early termination (full or partial): the parties may agree on early termination of a CDS. In practice, one of the parties may have proposed early termination to take advantage of an inside information. Thus, early terminations and partial terminations should be reported. They would usually take the form of reverse transactions of the initial one.

Assignments (full or partial): one of the parties to a CDS contract is replaced by another. As this kind of transactions result in a change of exposure of some participants, an assignment should be reported by every participant with a changing exposure. The party that is still involved in the contract and experiences no change in exposure to the credit risk is not expected to report.

<u>Compression:</u> these transactions play the role of a clearing between participants. For instance, if A has bought protection for 5 M€ of notional amount on issuer X from B at 100 bp, B has bought protection for 2M€ of notional amount on the same issuer from C at 95 bp, and C has bought protection for 3M€ of notional amount from A at 105 bp, specific transactions (including payments due to the different in prices) can be agreed on so as to reduce the size of notional amount protected for each counterpart. In the end, A will still get protection for 3 M€ of notional amount from B, and grant protection on 1M€ of notional amount for C; there will be no contract anymore between B and C. These transactions do not change the overall exposure of any market participant to an issuer's risk, and are of little interest to regulators. Thus, it is suggested that they should not be reported.

21) *Example 8.1*

xxxvii. CONTEXT

Client A sells protection to firm B for 20 million Dollars in Alcatel debt. Reference obligation is Alcatel 4,75% January 2011 (FR0000189201).

xxxviii. DATA

Field	Report from firm A	Report from firm B
Trading day	2009-09-17	2009-09-17
Trading time	15:35:31	15:35:31
Reporting firm identification	A	B
Counterparty code	B	A
Venue identification	XXXX	XXXX
Buy/Sell Indicator	S	B
Trading capacity	P	P

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Quantity	20000000	20000000
Unit Price	485	485
Price Notation	USD	USD
Derivative type	Z	Z
Ultimate underlying identification	FR0000189201	FR0000189201
Put/call identifier		
Price multiplier		
Strike price	500	500
Expiration date	2014-03-20	2014-03-20
Instrument identification		

xxxix. *EXPLANATIONS*

Buy / Sell indicator: B is for the buyer of protection, S for the seller of protection.

Unit Price
In this example, the transaction requires a 500 basis points annual coupon and an initial payment of 970k€ i.e. 485 bps of the nominal.

Quantity: this is the notional amount for which protection is bought / sold. The notional amount is expressed in currency – i.e. Euros in this case (NOT in standard 10M contracts)

IX. Complex derivatives

22) Description of the instrument type

CESR would encourage firms to use the derivative types detailed above as far as possible. However, CESR also recognises that there will be certain OTC derivatives that might share certain characteristics of these OTC derivative types, but have sufficiently different characteristics to prevent them being grouped with other derivative types.

This derivative type classification should be used for the following derivative examples:

- where the OTC derivative is an option that cannot be classified as a call or put option at the time the transaction is entered in to.

- where the OTC derivative is an option or warrant that has multiple puts and calls.

- where the OTC derivative is an option that allows the purchaser to choose whether the option is a call or a put on a particular date in the future (often referred to as a chooser option).

- where the OTC derivative is an option or a warrant and the strike price is not known at the time the transaction is entered into and is instead based on the average price over an averaging period.

- where the OTC derivative has multiple potential strike prices.

- cliquet options where the strike price periodically resets before the expiry date.

- where the OTC derivative is an option with a forward start date.

This list is not exhaustive and it is expected that new complex OTC derivatives will be created in the future. However, this category must not be abused and we would expect firms to agree with their local CAs that this category is suitable for certain OTC derivatives before it is used.

Firms should report complex derivatives as a combination of vanilla "building blocks". CESR strongly recommends that the Instrument Description field should be required to be populated at local level, in order to explain the derivative being reported. In such cases, it is not expected that the description will allow regulators to re-build the complex-derivative, but at least regulators should be made aware that the transaction is only a part of a wider package.

23) *Example 9.1*

xl. CONTEXT

On 04 November 2010 at 10:24:46 UTC, an investment firm A enters an agreement to buy 5000 chooser option contracts from investment firm B. Each contract allows investment firm A to either buy or sell 1000 Vodafone shares of Vodafone plc common stock for 140p at any date up to 31/12/10. The contract premium is 15p.

xli. DATA

Field	Report from firm A	Report from firm B
Trading day	2010-11-04	2010-11-04
Trading time	10:24:46	10:24:46
Reporting firm identification	A	B
Instrument Description	Vodafone 140 Chooser Option 31 Dec 10	Vodafone 140 Chooser Option 31 Dec 10
Counterparty code	B	A
Venue identification	XXXX	XXXX
Buy/Sell Indicator	B	S
Trading capacity	P	P
Quantity	5000	5000
Unit Price	0.15	0.15
Price Notation	GBP	GBP
Derivative type	K	K
Ultimate underlying identification	GB00B16GWD567	GB00B16GWD567
Put/call identifier		
Price multiplier	1000	1000
Strike price	1.4	1.4
Expiration date	2010-12-31	2010-12-31
Instrument identification		

xlii. EXPLANATIONS

Put/call Identifier
Although the instrument is an option, the put/call identifier cannot be populated as the option gives the right to either sell or buy the underlying instrument.

Instrument description

CESR does not intend to exchange the instrument description through TREM, due to languages differences.