

Description of KDPW\_TR EMIR functionalities

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## Glossary

**Trade** – transaction in derivatives

**Position** – one or more trades in derivatives (with the same underlying) between the same counterparties

**Report** – reporting a trade or position between two counterparties

**Reporting** – sending a message to TR for a new trade/position in derivatives or a modification of the terms of a trade

**AT** – Action Type – a field from ESMA validation table

**Record** – entry of an incoming report into the database; in practice, the TR system may keep multiple records for one report (trade or position)

### **EMIR RTS/ITS:**

COMMISSION DELEGATED REGULATION (EU) 2017/104 of 19 October 2016 amending Delegated Regulation (EU) No 148/2013 supplementing Regulation (EU) No 648/2012 of the European Parliament and of the Council on OTC derivatives, central counterparties and trade repositories with regard to regulatory technical standards on the minimum details of the data to be reported to trade repositories.

COMMISSION IMPLEMENTING REGULATION (EU) 2017/105 of 19 October 2016 amending Implementing Regulation (EU) No 1247/2012 laying down implementing technical standards with regard to the format and frequency of trade reports to trade repositories according to Regulation (EU) No 648/2012 of the European Parliament and of the Council on OTC derivatives, central counterparties and trade repositories.

## Trade Repository EMIR users

The following categories of entities, each with different rights, apply:

- 1) **Trade Repository operator** – a KDPW\_TR employee;
- 2) **Supervisor** – entity authorised under Regulation of the European Parliament and of the Council (EU) No 648/2012 of 4 July 2012 (Article 81(3)), which has access to TR data under the authorisation pursuant to the regulations. Supervisors have access to both trade data and reports under Commission requirements and regulations.
- 3) **General reporting participant (GUR)** – an entity authorised to report on its own behalf or on behalf of another entity as an intermediary (not a trade counterparty); authorised to enter, modify and delete reports where it is a reporting entity (acting on its own behalf or on behalf of another trading entity), can view data reported by it and data reported by other reporting entities to which it is a counterparty; can use both the WEB and the MQ channel.
- 4) **Ordinary reporting participant (ZUR)** – an entity authorised to report on its own behalf or on behalf of a counterparty provided that it is a trade counterparty; authorised to enter, modify and delete data where it is a reporting entity, can view data reported by it and trade and position data reported by other reporting entities to which it is a counterparty; can use both the WEB and the MQ channel.
- 5) **Individual reporting participant (IUR)** – an entity authorised to report only on its own behalf; authorised to enter, modify and delete data where it is a reporting entity, can view data reported by it and trade and position data reported by other reporting entities to which it is a counterparty; can use both the WEB and the MQ channel.
- 6) **Indirect repository participant (PUR)** – an entity which does not report data of own trades but is interested in viewing reports and possibly reporting errors in reports to which it is a trading entity (trade counterparty), can use both the WEB and the MQ channel;
- 7) **Commercial repository user (KUR)** – an entity authorised by a counterparty being a repository participant to access data of its reports. Irrespective of its relationship with KDPW\_TR, such entity will have a special designation: KUR (it is irrelevant whether such entity already holds ZUR or GUR status). KUR is identified by TR on registration of rights. It uses the Web and the MQ channel.

The Trade Repository EMIR is required to provide counterparties, understood as parties to a trade (under Article 80 of EMIR), with the option of reviewing reports in order to check their correctness. In practice, all interested entities identified by report submitting entities as counterparties to a contract must be allowed access to view their data. Access is provided both over the website www and over the A2A channel, and it is limited to those reports only for which the institution is a counterparty. Such access is available to PUR – counterparties. For indirect participants, viewing information of reported trades and positions is the only action allowed in KDPW\_TR.

## Accessing KDPW\_TR EMIR

The main function of the Trade Repository is to register trade and position reports. Registration is based on defined messages sent to the Trade Repository by a reporting participant. Messages can be sent over the following channels:

- **graphical user interface** which supports manual data exchange with the TR application. Implemented on the basis of an application available on the website [www.kdpw.pl](http://www.kdpw.pl). The interface is available in the internet.
- **A2A (Application to Application) channel** supporting automated data exchange between the KDPW\_TR application and KDPW\_TR user applications. Implemented on the basis of exchange of defined XML messages via IBM WebSphere MQ. The A2A channel is available in the internet using a secure VPN tunnel (VPN concentrator or communication router) and in the extranet developed with digital channels from the operators Polpak and Exatel.

The communication channel configuration parameters and the MQ queue name, the MQ communication channel are available on the website. More details, the access profile and the password are provided to interested users on request for A2A access to the environment and after downloading an electronic certificate used to authenticate the communication channel set up with telecommunication equipment. The interface supports IBM WebSphere MQ software in Client version and in Server version. KDPW does not participate in distribution of the software.

KDPW\_TR EMIR reporting messages have been developed on the basis of the scope of information defined by the regulators. They contain a set of data required by the Trade Repository in order to correctly identify trades/positions and adequately process reporting functions. TR system input messages (irrespective of the action type declared therein) have a uniform structure; however, simplified collective messages have also been developed as an alternative for the processing of specific modifications. The scope of required and processed data depends on the type of report, as described below.

For reporting with XML messages through the A2A or the graphical user interface, multiple trades may be reported in a single file. In that case, the feedback message presents the processing status of each report and, in case of errors, the error code is stated. If a graphical form is used, feedback messages are also sent to a dedicated folder ('TR Communication' tab) where they can be downloaded in \*.xml format. This functionality also supports notification of the reporting participant about deletion of the report by the other counterparty (AT=E), as well as conflicts detected in reconciliation. Such messages are sent to the website interface only where the concerned report has been sent through the graphical user interface. As a general principle, feedback messages are sent over the channel through which the reports were sent.

## Processing messages

### XML message structure

The names of KDPW\_TR messages are based on ISO20022 recommendations.

The message name structure is as follows:

**yyyy.aaa.bbb.xx**

where:

yyyy - message prefix:

trar – KDPW\_TR system message prefix;

admi – formal error message;

aaa — message type depending on message function:

ins- report;

rqs – request;

sts – reply;

rcn – reconciliation;

err – formal error message;

ntf – notification.

bbb — message function variant code – numerical;

xx — message version - numerical.

The names and structures of the XML messages are published on the KDPW website.

### Namespaces

KDPW\_TR EMIR messages use four namespaces:

- Default namespace (defaultnamespace)

The name includes a fixed part, as follows:

**urn:std:kdpw:**

and a variable part according the following schema:

- **xsd:IdentyfikatorKomunikatu**  
(e.g.: urn:std:kdpw:xsd:trar.ins.001.02)
- xs: standard namespace for W3C XML schema
- xsi: standard namespace for W3C XML schemainstance
- target namespace — same as default namespace

### Headers

The first element of each message always has the following name: **<KDPWDocument>**. The element contains the following mandatory attributes:

Sndr (sender) — message sender: KDPW\_TR participant identifier or KDPW\_TR identifier (R001);

Rcvr (receiver) — message receiver: KDPW\_TR participant identifier or KDPW\_TR identifier (R001).

The second element (direct child of the main element) always has a name identical to the message name.

*Example:*

```
<KDPWDocumentSndr="kod wystawcy" Rcvr="R001"
  xmlns="urn:std:kdpw:xsd: yyyy.aaa.bbb.xx"
  xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"

  <yyyy.aaa.bbb.xx>
    <GnlInf>
      ...
    </GnlInf>
    ...
  </yyyy.aaa.bbb.xx>
</KDPWDocument>
```

## Character set

KDPW\_TR EMIR messages use the UTF-8 character encoding set.

## Flows of messages between Users and the Trade Repository

KDPW\_TR EMIR uses the following message types:

- 1) TR system report - trar.ins.001.xx (where xx is the current message version);
- 2) Valuation report - trar.ins.002.xx (where xx is the current message version);
- 3) Notification - trar.ntf.001.xx (where xx is the current message version);
- 4) Acceptance of a report in the TR system after a formal check (level 1 feedback message) – trar.ack.001.xx (where xx is the current message version);
- 5) Formal error message – admi.err.001.xx (where xx is the current message version);
- 6) TR system report status message after a substantive check for a standard report (level 2 feedback message) - trar.sts.003.xx (where xx is the current message version);

- 7) TR system report status message after a substantive check for an aggregate report or a request (level 2 feedback message) - trar.sts.002.xx (where xx is the current message version);
- 8) TR system message processing status message after a substantive check for an aggregate report or a request (level 3 feedback message) - trar.sts.002.xx (where xx is the current message version);
- 9) TR system processing and entry confirmation message (level 3 feedback message) - trar.sts.001.xx (where xx is the current message version);
- 10) Request message - trar.rqs.001.xx (where xx is the current message version);
- 11) Report pairing or comparison failure message - trar.rcn.001.xx (where xx is the current message version).

Trade and position reports and other report modification messages are sent to KDPW\_TR (in messages trar.ins.xxx.xx). Each accepted message is processed in the system; a response is sent back to the sender for information at every step of processing (if so requested by the participant in the participant's declaration).

#### **Level I – formal checks**

In case of a formal error, the message is admi.err.001.xx and contains the error code and description as well as the location of the error. Formal errors include the following:

- message inconsistent with the XSD schema
- sender inconsistent with the sender in the field Report submitting entity ID (tag RptgNtty) in the message or the field is void and the reporting counterparty is reported in the field Counterparty – Identification (tag RptgCtrPtyId) in the message.

In response to a message where no formal error is identified, the system will generate one feedback message trar.ack.001.xx confirming receipt of the message and successful formal check irrespective of the number of trades in the original message.

#### **Level II – substantive check**

The outcome of the substantive check is communicated in message trar.sts.003.xx with the relevant status (PACK for a correct message, ERRO for an error).

#### **Level III – record in the KDPW\_TR database**

After the report is processed and the data are recorded in the KDPW\_TR database, the reporting participant receives a message confirming data recorded in the KDPW\_TR database on the basis of the report (trar.sts.001.xx, status PACK).

Notification messages generated by the TR system are sent to participants in the following instances:

trar.rcn.001.xx

- Notification message informing about results of the reconciliation. In trar.rcn.001.xx message you will notice a status of pairing and comparing reports as well as discrepancies – meaning a repeatable section [1..n] covering all causes and descriptions of causes, for each discrepancy that occurred as a result of comparing reports. Additionally, in the event of a discrepancy, the

values reported in this field by the participants are also reported, with both reporting persons receiving the value provided by themselves and the value provided by the other party.

trar.ntf.001.xx, can be received in 2 cases:

in case of AT=T (technical) – notification message trar.ntf.001.xx will inform about expiry of the report on its maturity date. The above mentioned technical message AT=T is being sent at the beginning of the day specified by the maturity date.

- If the other party sends AT=E (provided that the other party reports to KDPW) – notification message trar.ntf.001.xx is informing about cancellation (AT=E) of the report by the other party. In the received notification the Eligibility Date will be equal to the date of sending the AT=E by the other party. In addition the notification will contain trade key and the following response code:
- <RsnCd>1253</RsnCd>, <RsnTxt>Trade annulled (AT=E) by the other counterparty.</RsnTxt>

All messages incoming to KDPW\_TR EMIR are immediately accepted and feedback messages are sent over the same channel through which they were received.

The figures below present the KDPW\_TR EMIR message flow diagrams:

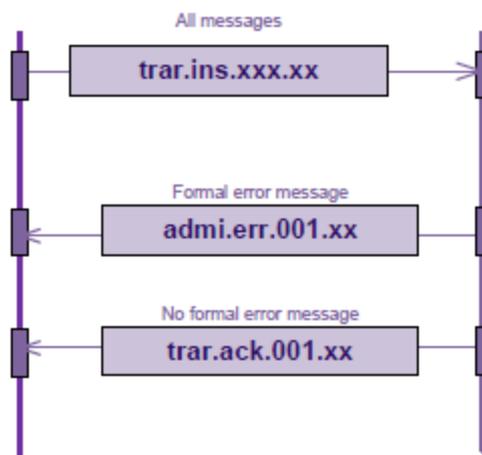
## Komunikaty zwrotne po kontroli formalnej Feedback messages after formal checks



Uczestnik Raportujący  
Reporting Participant



Repozytorium  
Trade Repository



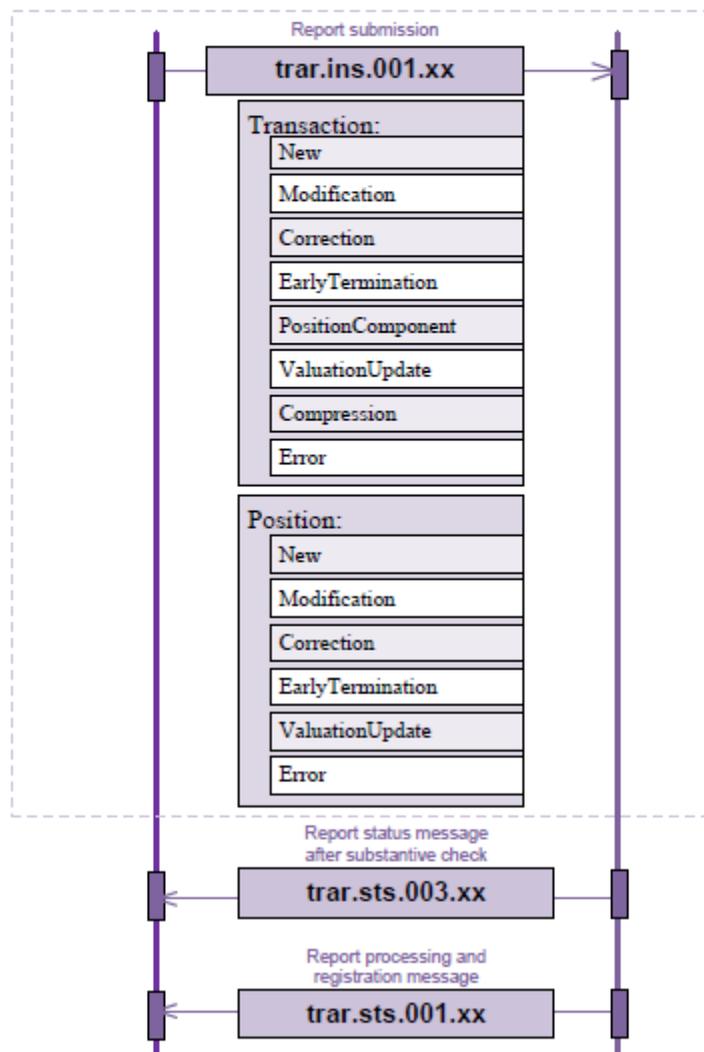
## Komunikaty zwrotne po kontroli merytorycznej Feedback messages after substantive checks



Uczestnik Raportujący  
Reporting Participant



Repozytorium  
Trade Repository



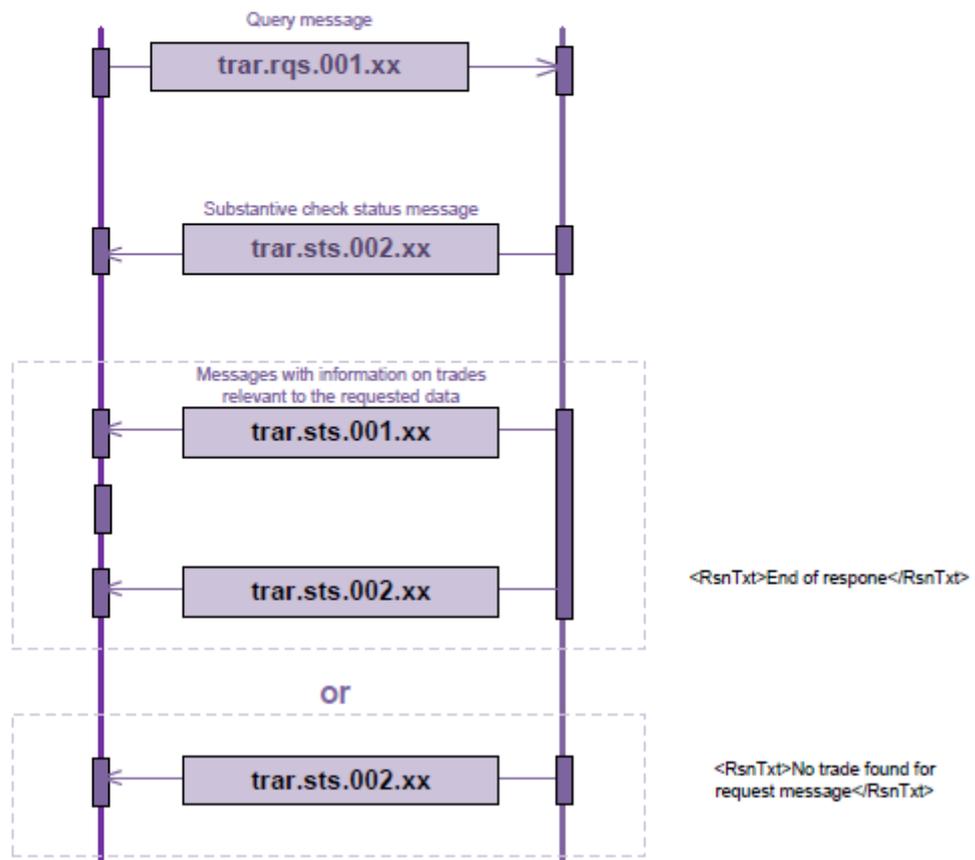
## Obsługa zapytań o status zarejestrowanej transakcji Handling status queries



Uczestnik Raportujący  
Reporting Participant



Repozytorium  
Trade Repository



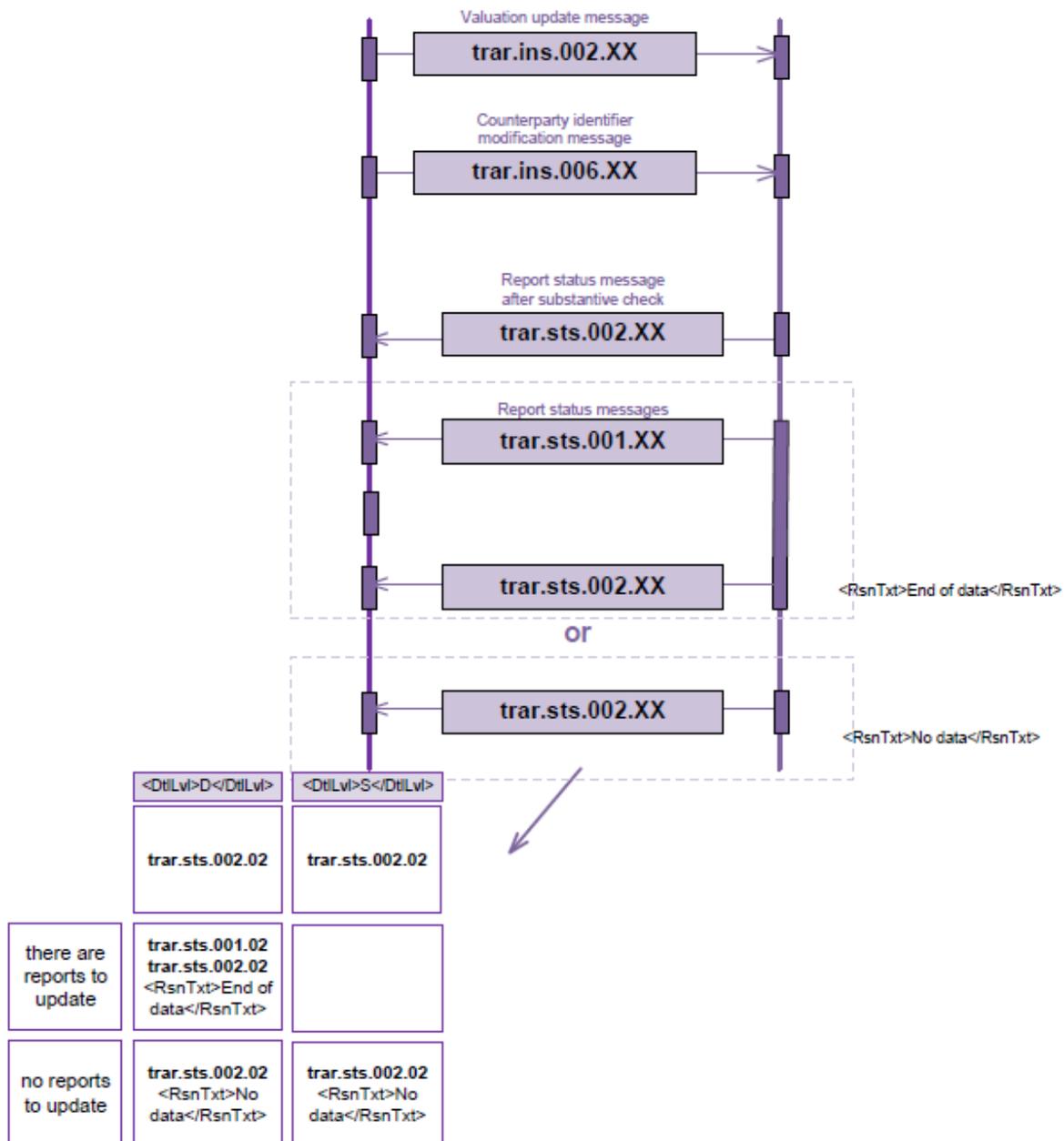
## Zbiornicze komunikaty zgłoszenia Summary reports



Uczestnik Raportujący  
Reporting Participant



Repozytorium  
Trade Repository



Irrespective of the incoming channel (website graphical interface or the A2A interface – see the section ‘Accessing KDPW\_TR’), all messages are processed on a FIFO (first in first out) basis. The TR system processes messages in the order they were received. This means that two consecutive messages can be sent for the same report (e.g., new report AT=N and compression AT=Z) without waiting for confirmation of processing of the first message. According to this principle, the TR system will not register compression before processing a new trade report if the new report is entered before the compression.

## Scope of information maintained in KDPW\_TR EMIR

TR reporting messages contain the following sections:

1. **'General information'** including the Sender Message Reference (SMR) and the Report Submitting Entity ID (required if different from the Counterparty ID).
2. **'Report'** including the data required under the EMIR RTS and ITS.  
The 'Report' section contains two subsections: 'Transaction' and 'Position', which contain subsections including data required for the action type (AT).

Both counterparties may simultaneously send a reporting message: the message structure requires in such cases that the data in subsection Counterparty (CtrPty) and possibly Valuation (Valtn) or Collateral (Coll) in the subsection relevant to the action type (AT) must be sent twice and data in section CommonTradeData (CmonTradData) must be sent once. On the basis of such reports, the KDPW\_TR database opens two new records with information based on reported data, separately for each counterparty. If a report is sent for one counterparty, data in all sections should be completed once and the existence of the other counterparty report is checked in a separate process of pairing and comparing reports (reconciliation), as described in a separate document, 'Description of the Reconciliation Process', available on the KDPW\_TR website.

For a dual-sided report, each counterparty has access to information in one report, where it is a counterparty (Reporting Counterparty ID), but it cannot see the report of the other counterparty, where it is the other counterparty (ID of the Other Counterparty). Only the report submitting entity has access to information in both reports it has sent.

### TR system report identifiers

The main report identifiers from the perspective of KDPW\_TR Participants include the following:

- Sender Message Reference (SMR),
- Unique Trade Identifier (UnqTradIdr),
- Reporting\_Counterparty ID (RptgCtrPtyId),
- ID of the Other Counterparty (OthrCtrPty).

All these identifiers (except SMR) are keys, i.e., fields which cannot be modified in a regular report message by any TR system user. UTI may be modified by deleting the report (AT=E) and resending the report (AT=N) with a new UTI and other reports, if required.

### Identifiers assigned by the reporting entity:

#### Sender Message Reference (SMR)

The SMR is the reporting entity 's identifier of a record in report history. TR does not check whether the SMR is unique.

The SMR is represented by a 16-character alphanumeric field.

#### UniqueTradeIdentifier (UnqTradIdr)

Unique Trade Identifier (UTI) agreed by the counterparties according to the ESMA 'Questions and Answers' (TR question/answer 18 and 19). TR checks whether the identifier is unique to the extent of the trade/position key (including TID and counterparty identifiers). The same UTI (UnqTradIdr) can be used only once by the same counterparties. An attempt to use the same UnqTradIdr between the same counterparties will cause the message to be rejected even if the previous report has been fully deleted (by reporting AT=E to delete the entire trade). The identifier always remains unchanged with modifications of the trade.

The identifier is represented by a 52-character alphanumeric field.

#### Reporting Counterparty ID (RptgCtrPtyId)

Unique counterparty identifier, i.e., a 20-character alphanumeric LEI.

#### ID of the Other Counterparty (OthrCtrPty)

Unique other counterparty identifier, i.e., a 20-character alphanumeric LEI or, for entities without the reporting obligation under Article 9 of EMIR, a 50-character alphanumeric client identifier.

### **Key dates in reporting**

The following dates are used in reporting:

- **'Reporting timestamp'** – date and time of sending the report to KDPW\_TR by the reporting participant (format according to ISO 8601: YYYY-MM-DDThh: mm: ssZ),
- 

According to the ESMA's validation table, the reporting timestamp should be equal or earlier than the timestamp of the receipt of the report by KDPW. The date part of the timestamp cannot be earlier than the day preceding the date of the receipt of the report by the TR.

Reporting timestamp <= time of the receipt of the report by KDPW\_TR (ReceivedDtTm)

Reporting timestamp > date of the receipt of the report by KDPW\_TR (ReceivedDt) minus 2 days

- **'Valuation timestamp'** – date and time of valuation;
- **'Execution timestamp'** – date and time of transaction execution;
- **'Effective date'** – effective date of obligations under the contract;
- **'Maturity date'** – date of expiry of the reported contract; the field is not used to report early termination;
- **'Termination date'** – date of early termination of the reported contract;
- **'Eligibility date'** – eligibility date of the trade/position record (the field is not defined in the technical standards); it is the date as of which details provided in a message reported to the KDPW\_TR system apply;

- for AT=N (level P) Eligibility date is mandatory;
  - for AT=N, AT=P (level T) - Eligibility date = Execution timestamp;
  - for AT=M, AT=R i AT=V ( collateral) - Eligibility date is mandatory;
  - for AT=V (valuation) - Eligibility date = Valuation Timestamp;
  - for AT=C and AT=Z Eligibility date =Termination date
- **'Settlement date'** – settlement date of the underlying. Any number of settlement dates defined in the contract may be provided in a report; each subsequent date is saved in the KDPW\_TR database.

### KDPW\_TR EMIR entity identifiers

- Sender ID
- Receiver ID
- Report Submitting Entity ID
- Reporting Counterparty ID
- ID of the Other Counterparty
- Broker ID
- Clearing Member ID
- Beneficiary ID

#### Sender ID

Communication identifier of the message sender – reporting entity, composed of four alphanumeric characters used to properly address the message according to the rules of processing messages in KDPW. For messages sent by reporting participants directly over the MQ channel, it is an identifier associated with the issued certificate. Where messages are sent from TR to reporting participants, the sender ID is the TR identifier (R001).

#### Receiver ID

Communication identifier of the message receiver – reporting entity, composed of four alphanumeric characters used to properly address the message according to the rules of processing messages in KDPW. For messages sent to TR, the field should contain the TR identifier (R001). Where messages are sent from TR to reporting participants, it is the identifier of the reporting participant.

#### Report Submitting Entity ID

The report submitting entity must be registered in the TR database under one of the available types of participation. During the configuration of the reporting participant, the system requires an LEI, which is a mandatory field and the only acceptable identifier in all messages sent by the participant. It is composed of 20 alphanumeric characters.

The ID combined with the Reporting Counterparty ID is used to check the right to report to the Trade Repository. When reporting on own behalf (GUR, IUR or ZUR), the field should be void.

### Reporting Counterparty ID

Unique identifier of the reporting counterparty according to RTS/ITS (20-character alphanumeric LEI). The field identifies a trade counterparty. The identifier is used in the trade/position key (together with the ID of the other counterparty and UTI). The value in the field cannot be modified within the lifetime of the trade, from reporting to expiration/termination, with the exception of replacement of the interim counterparty identifier with an LEI.\*

The LEI code must be valid, i.e. it must have an appropriate status. The permissible statuses for action types AT = N, M, R, Z, V and P are "Issued", "Pending transfer" and "Pending archival". In the case of AT = C, the LEI code may additionally have the status: "Lapsed" and "Retired", while for AT = E the status is ignored.

### ID of the Other Counterparty

Unique identifier of the other counterparty according to RTS/ITS (LEI or client identifier allowed for individuals not acting in a business capacity). The field identifies the other counterparty. The field is used in the trade/position key (together with the Counterparty ID and UTI). The value in the field cannot be modified within the term of the trade, from reporting to expiration/termination, with the exception of replacement of the interim counterparty identifier with an LEI\*.

The LEI code must be valid, i.e. it must have an appropriate status. The permissible statuses for action types AT = N, M, R, Z, V and P are "Issued", "Pending transfer" and "Pending archival". In the case of AT = C, the LEI code may additionally have the status "Retired", while for AT = E the status is ignored.

\* According to Q&A TR Q40, in cases of changing the Client Code into a LEI code, the change occurs only for the counterparties fields, ie it is applied only to the fields: Reporting Counterparty ID and ID of the other counterparty. This operation does not change the codes in the other report fields (Broker ID, Reporting entity ID, Clearing member ID, Beneficiary ID, CCP ID, Underlying), but nevertheless it allows the corrections (AT = R) to these reports.

However, for mergers or acquisitions, the change of the LEI into another LEI code includes all fields (entity identifiers) in which the given LEI code exists and applies to all reporting participants, not only the participant changing the LEI code.

### Broker ID

Where a broker acts as an intermediary of the reporting counterparty but does not become a counterparty, the reporting counterparty identifies the broker with a unique identifier in the field BrokerId.

The identifier is not agreed with the other counterparty, it is only used as a trade characteristic. The value in the field can be modified within the lifetime of the trade, from reporting to expiration/termination.

The required Broker ID is an LEI.

### Clearing Member ID

If the reporting counterparty is not a clearing member, the field presents the unique identifier of its clearing member.

The identifier is not agreed with the other counterparty, it is only used as a trade characteristic. The value in the field can be modified within the lifetime of the trade, from reporting to expiration/termination.

The required Clearing Member ID is an LEI.

#### Beneficiary ID

A party which is bound by the rights and obligations under the contract is reported in the field Bnfcryld. The identifier is not agreed with the other counterparty, it is only used as a trade characteristic. The value in the field cannot be modified within the lifetime of the trade, from reporting to expiration/termination.

## Checking action types

Each report sent to KDPW\_TR, which is checked successfully generates an entry (mutation) in the KDPW TR's database: one entry (for single-sided reports) or two (for dual-sided reports). Each new trade/position record in the TR database is assigned a unique report identifier and an eligibility date.

Report details are available in the interface under three tabs by status:

- 'Active reports' – presents active reports
- 'Non-active reports' – presents non-active reports
- 'Deleted reports' - presents deleted reports

The scope of data presented in the 'Deleted reports' tabs is limited to the report key, i.e., the following fields: UTI, Reporting Counterparty ID, Other Counterparty ID.

## Action types

Each action type (AT) can be used to record specific changes/information. The applicable substantive checks are directly defined in the ESMA validation table.

When a report provided by the report submitting entity is being recorded in the TR database, the following information is saved:

- Reporting Timestamp;
- time of receipt of the report to the KDPW TR system (Received DtTm),
- report submitting entity's technical ID.

A report can be edited over the website interface after retrieving a report to be modified in the relevant tab. To this end, tools are available to filter reports by relevant fields: UTI, eligibility date, action type, etc. The detailed operating terms of the graphical interface are described in the "Graphical User Interface Manual (U2A)".

### Reporting modifications with action types AT=M, AT=R and AT=V

1) The following data modifications are supported:

- Adding new records after existing records, i.e., data modification (AT=M) or correction (AT=R) or valuation/collateral update (AT=V) from a date greater than the last valid record of the report;
- Overwriting the existing history, i.e., supplementing data during the report lifetime – data modification for a date greater than or equal to the date of the first valid record for the report and lower than or equal to the date of the last valid record (AT=M, AT=R or AT=V); messages with AT=M, AT=V or AT=R at a given eligibility date update a record from the date set in the message until the eligibility date of the record;

## Recording reports by action type

The technical standards effective as of 1 November 2017 introduced the 'Level' indicator, which is used by participants to flag whether the report is for a trade (T) or a position (P). The indicator determines the processing method of the reporting, in particular the available action types, the mandatory fields and their validations. Action types AT=P (position component) and AT=Z (compression) are only available for T reports (level T).

### AT=N (New)

A new report message (AT=N) is used to report a new trade/position to the Trade Repository. In this message, the report submitting entity should provide the complete details required for the report to be recorded. After performing the checks, based on the message, the KDPW\_TR system records the new report and sends confirmation to the report submitting entity depending on the configuration of feedback messages. Mandatory fields are defined directly in the validation requirements published by ESMA.

A closed backloaded trade/position should be reported as AT=N at trade/position level with a maturity date. If the trade/position was terminated before the expiry date, an AT=C report for the report including the termination date should also be submitted.

AT= N generates a record with the state active, visible under 'Active reports' tab

A record created with AT=N cannot be overwritten by AT=N. Incorrect data sent with AT=N may be corrected with AT=R (correction); where a trade/position with a given UTI is not found, AT=E can be reported to delete all records for the report so **no report** with the same UTI (report key) can then be sent.

For the U2A interface, reports are submitted according to an available template corresponding to the KDPW\_TR report message structure or using the Import XML function which allows to import an XML file with AT=N to KDPW\_TR. The 'Reporting service' tab provides the functionality of sending reports: after the 'Action Type New' option is selected, a template is displayed to enter report details. After the details are entered, the user confirms the report. If a substantive error is detected, a feedback message trar.sts.003.xx with ERRO status is made available in the 'TR Communication' tab, while the absence of errors is confirmed in a message with the status PACK. After successful processing, the report is recorded in the KDPW TR database.

### AT=P (Position component)

A position component message (AT=P) is only used to report a new trade which is no longer valid at the execution date due to the conclusion of an opposite trade and the creation of a position subject to valuation/collateral update and other reports in further reporting.

In AT=P, reporting entities should provide complete information, the same as in AT=N, including the mandatory termination date.

The main difference compared to AT=N is that AT=P is presented from the time of registration in the database as non-active in the 'Non-active reports' tab.

## AT=M (Modify)

A detailed modification message (AT=M) is used to report modifications to the term of a trade previously reported to KDPW\_TR, other than a correction of previously reported values.<sup>1</sup> The action type includes updates of position reports to include new trades in the position. This means that a report to be modified must be maintained in the TR system (it must have been reported previously in a report with action type N). In the AT=M message, the reporting entity should provide the report key necessary to identify the relevant report to be modified and the eligibility date.

In addition, if you want to make any change in the 'old' reports reported before validation level II (before November 2017), you need to update the transaction / report to the currently applicable schema by sending AT = R and then you can modify the transaction by sending AT = M.

The necessary condition for the modification to be accepted into the system is the existence of an active entry in the reporting history for the effective date of the modification (change), meaning Eligibility date = Execution Date.

If the reporting participant reports for both counterparties, the modification may apply to a selected report of one counterparty (if the section Counterparty Specific Data is completed once) or both reports of both counterparties (if the section Counterparty Specific Data is completed twice).

In the case of changing the fields for which the conditional controls described in the ESMA validation table have been defined, it is necessary to provide the set of fields that make up this validation, which means that the AT=M report is validated similarly to the AT=N report (except for the following fields: Compression, Venue of Execution and Termination date, which cannot be reported in AT=M according to the EMIR valuation table, as they do not exist in AT=N, those parts of the message must not be populated).

In AT = M, it is required to fill in the entire data set, and empty optional fields in AT = M are cleared (in the database they will be presented as empty fields), of course, with the exception of canon fields: Execution Date, Counterparty Side, Technical Underlying.

## AT=M (level T)

In AT = M (level T) it is not possible to change the fields, the change of which applies to the entire report history, that is

- canon fields: Execution Date, Counterparty Side, Technical Underlying. This means that if we introduce a change to any of the above-mentioned fields from the canon, the system will accept the AT=M report, but will ignore the change, meaning the change will not be saved in the KDPW\_TR system.
- fields included in the report key: Reporting Counterparty ID, ID of the other counterparty, UTI ;
- the 'Level' field;
- Valuation and collateral fields - modification of these fields with AT = V.

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<sup>1</sup> The difference between a modification and a correction of data is defined by the report submitting entity. Modification is understood as a change of the terms of the trade; correction is understood as an adjustment of incorrectly reported data.

## AT=M (level P)

In AT = M (level P) the below fields cannot be changed:

- fields included in the report key: Reporting Counterparty ID, ID of the other counterparty, UTI\*;
- 'Level' field
- Valuation and collateral fields - modification of these fields with AT = V

However, you can change the values of the fields from the canon:

- Execution Date,
- Counterparty Side,
- Technical Underlying

### for Eligibility date equal to the date of entering the report into KDPW\_TR (current date)

\*Errors in the report key should be reported with AT=E, which causes the report and all its history to be deleted. The next, correct report should have a new UTI agreed by the counterparties.

## AT=R (Correction)

If a previously reported record contains incorrect information, it should be corrected with an AT=R report.

AT = R should be used if you want to make any changes in the 'old' reports, i.e. reported before validation level II (before November 2017), which at the same time adapts such a report to the currently applicable schemes.

The AT=R message contains all fields to be corrected.

If the fields to be modified are subject to conditional checks defined in the ESMA validation table, it is required to provide the complete set of fields for validation (the same as for AT=M), which means that the AT = R report is validated similarly to the AT=N report with the exception of the 'Termination date' field, which is not present in AT=N. In AT=R, it is required to fill in the entire data set, and the unfilled optional fields in AT=R are cleared (in the database they will be presented as empty fields).

Sending an AT=R report always overwrites an existing entry.

In cases where the reporting participant has reported on behalf of both parties, the selected report of one party (if identifiers were provided in section 2 once) or two reports - for both parties to the contract (if section 2 occurs twice) may be corrected.

In AT=R (level T and level P) the following fields cannot be corrected:

- fields included in the report key: Reporting Counterparty ID, ID of the other counterparty, UTI\*;
- the 'Level' field;
- Valuation and collateral fields - modification of these fields with AT=V;
- fields indicated as empty in the ESMA validation table (they are ignored in the AT=R declaration).

\*Errors in the trade key should be reported with AT=E, which causes the report and all its history to be deleted. The next, correct report should have a new UTI agreed by the counterparties.

In AT = R, you can revise active or inactive transaction fields.

AT=R supports on-going modifications of reports:

- for a single entry (mutation):
  - when the effective date of the 'Eligibility date' is greater than the 'Execution timestamp' conclusion, i.e. when we want to correct the Maturity date field, for a transaction for which the expiry date has already taken place according to the incorrect Maturity date in the last record, meaning max EligDt. If the request is inactive, then after changing the Maturity date in the last record, it returns to active and is terminated by AT = T at the appropriate moment. )

In such a report, the fields from the canon: Execution timestamp, Counterparty Side, Compression, TechUndrlyg, Venue of Execution are ignored.

- for the entire transaction history:
  - when the effective date 'Eligibility date' = the 'Execution timestamp', for fields from the canon: Execution timestamp, Counterparty Side, Compression, TechUndrlyg, Venue of Execution,

The change of the remaining fields will be applied only for one entry (mutation), effective from the "Eligibility date";

- for a transaction history fragment:
  - valid from the "Eligibility date" to the date one day earlier, from the date of the next entry,

### Maturity date change

Changing the value in the Maturity date field is possible on each single mutation.

To change the Maturity date when the report is active and has more than one change (mutation) - then 'Eligibility date' = Report Date

The transaction is terminated according to the Maturity date in the last record, meaning the max 'Eligibility date'. If the reported transaction was inactive, it becomes active after changing the Maturity date in the last record.

### Canceling trade terminations

To withdraw the termination of a transaction that has been terminated by AT=C, action type AT=R should be sent to the last entry (mutation), where 'Eligibility date' = 'termination date'. Simultaneously the entered value in the 'termination date' field should be deleted. The remaining data regarding this transaction should be the same as at the moment it was terminated.

### Changing the termination date

#### ***Changing the termination date to a later date***

The termination date may be changed to a date later than the reported termination date with AT=R including a termination date, where Eligibility Date is equal to the date of the last valid entry (mutation).

In that case, the Trade Repository records AT=R at Eligibility Date where the termination date is deleted and a new C or Z, respectively, valid at the new termination date. The Trade Repository validates whether the report was non-active at the Eligibility Date (i.e., whether the termination date was populated); if not, the report changing the termination date will be rejected.

#### ***Changing the termination date to an earlier date***

The termination date may be changed to a date earlier than the reported termination date with AT=R valid at the last termination date without a populated termination date and AT=C/Z valid at the new termination date.

In that case, the Trade Repository activates the report valid at the currently valid termination date; following AT=C/Z, a new record is entered and all mutations after the new termination date are deleted (maintained in the TR database but inaccessible to the reporting entity).

### Changing date Execution timestamp

Using the R message (AT = R), we can change the Execution timestamp date earlier than originally reported.

However, changing the Execution timestamp date to a later date is not possible. In that case an E-type message must be sent and the transaction with the correct data must be again reported.

### AT=C (Early Termination)

Action type C reports early termination of the trade before maturity. The action type reports only full termination; partial termination should be reported with AT=M.

Each termination (AT=C) is considered to be full termination. The record is always assigned the status N (non-active). According to the ESMA validation table, AT=C reports are only required to contain the trade key and the Termination Date. Reports containing other values will be rejected.

The report key (Reporting Counterparty Id + Other Counterparty Id + UTI) and the Termination Date are mandatory in the sections Counterparty Specific Data and Transaction Data, subject to the following checks:

- if the previous report provided a Maturity Date, the Termination Date in AT=C must be less than or equal to the Maturity Date; otherwise, the message is rejected;
- if the value reported in the field Termination Date is later than the report date, the report is rejected by the TR system.

A termination report with an eligibility date greater than or equal to the trade execution date generates a new record AT=C valid as at that date.

A termination report with an eligibility date lower than the trade execution date will cause the message to be rejected.

AT=C generates an inactive entry

### AT=Z (Compression)

AT=Z reports contract compression before maturity. AT=Z may only be sent for a trade report; position reports cannot be compressed.

A compressed report gets the state N (non-active) in the database. According to the ESMA validation table, only the trade key and the termination date (understood as compression date) are required in AT=Z. Reports populated with other values will be rejected.

The trade key (Reporting Counterparty Id + Other Counterparty Id + UTI) and the termination date are mandatory in the sections Counterparty Specific Data and Transaction Data, subject to the following checks:

- if Maturity Date is populated in the previous report, then Termination Date in AT=Z must be lower than or equal to Maturity Date; otherwise, the report is rejected;
- if Termination Date in the report is later than the reporting date, the report is rejected by the TR system.

A compression report with an eligibility date greater than or equal to the trade execution date generates a new record AT=Z valid as at that date.

A compression report with an eligibility date lower than the trade execution date will cause the message to be rejected.

AT=Z generates an inactive entry.

### AT=V (Valuation and collateral update)

The message trar.ins.001.xx with AT=V is used to report valuation and/or collateral updates for trades/positions.

The valuation update of any product may be reported on an aggregate basis using the dedicated message trar.ins.002.xx.

#### Valuation update

Trade/position valuation is reported in the main message trar.ins.001.xx for AT=N (New) by completing the Valuation section but the date in the execution timestamp must be equal to the valuation date. If the date in the execution timestamp is different than the valuation date, the message is rejected.

Trade valuations may be reported or updated by modifying:

- a single trade with the message trar.ins.001.xx – (AT=V) by completing the Valuation section;

- potentially many trades by reporting product valuation in the aggregate message trar.ins.002.xx.

If valuation is reported in the dedicated field *Valuation timestamp*, the valuation date and time are copied. This is relevant in multiple reporting of valuation changes at the same date. In that case, the report with the latest time in the field *Valuation timestamp* is valid on the given day. All reports with an earlier time in the field *Valuation timestamp* on the given day are not valid but they are maintained in the KDPW\_TR database. In practice, the validity of valuation depends on the date and time in the field *Valuation timestamp* and not on the reporting timestamp (which is different from other action types).

Reporting valuation in the main message (trar.ins.001.xx AT=V) where the *Valuation timestamp* is equal to the *Valuation timestamp* previously reported by the participant in trar.ins.001.xx AT=V causes the new valuation to be recorded as valid while the previous valuation is no longer valid.

Reporting aggregate valuation where the date and time in the *Valuation timestamp* is equal to the date and time in the *Valuation timestamp* previously reported by the participant in aggregate valuation causes the new valuation to be recorded as valid while the previous valuation is no longer valid.

Aggregate (product) valuation reported at a given date is assigned to all active trades in the product at the aggregate valuation reporting date and time. Such valuation does not apply to trades which are reported after the message trar.ins.002.xx was received and processed (i.e., trades with a later reporting timestamp) unless a valuation with a later eligibility timestamp is assigned to such trades. Aggregate (product) valuation reports are accepted whether or not there are any trades in the product whose valuation is so reported.

Cancelling a trade with AT=E for AT=N cancels the entire trade history including all AT=V for the trade. Aggregate AT=V is not deleted from the KDPW\_TR database as it may apply to other trades as well.

Contract valuation is available in the View option of the www interface tabs 'Active reports' and 'Non-active reports'. Values are presented for four fields:

- Value of contract,
- Currency of the value,
- Valuation timestamp,
- Valuation type.

By sending the request message trar.rqs.001.xx, the participant will get the trade history (including valuation).

### **Collateral update**

Reporting members may report trade collateral in the main message trar.ins.001.xx (AT=N or AT=V) with a populated UTI in the Collateral section or report (analytic or synthetic) portfolio collateral with the message trar.ins.002.xx (AT=V) which contains no UTI but includes the portfolio identifier.

By sending the message trar.ins.001.xx (AT=N, AT=V with UTI populated in the Collateral section), participants may report/modify the portfolio identifier for the trade in the Portfolio field.

By sending the message trar.ins.001.xx (AT=V), participants may report the portfolio identifier for the collateral in the Portfolio field. The Collateral portfolio flag should be set to 'Y'. Otherwise, the message will be rejected.

By sending the message `trar.ins.001.xx` with the Portfolio field completed and the UTI field void, participants report portfolio collateral.

The Collateralisation field is mandatory both when reporting trade/position collateral and portfolio collateral.

Portfolio collateral is assigned based on the Portfolio field, i.e., by matching the Portfolio field previously reported in `AT=N trar.ins.001.xx` with a populated UTI and the Portfolio field in `trar.ins.001.xx` with a void UTI; this means that portfolio collateral is assigned to all those reports where the Collateral portfolio field is populated with a portfolio identifier equal to that in the Portfolio field in the portfolio collateral message.

In the case of multiple reporting of collateral changes at the same date., the report with the latest reporting timestamp is valid on the given day. All reports with an earlier time on the given day are not valid but they are maintained in the `KDPW_TR` database.

Aggregate (portfolio) collateral reported at a given date is assigned to all active trades at the aggregate collateral reporting date and time where the Portfolio field is populated with a portfolio identifier equal to that in the Portfolio field in the aggregate message. Such reports do not apply to trades which are reported after the aggregate message was received and processed (i.e., trades with a later reporting timestamp).

Aggregate (portfolio) collateral reports are accepted and recorded in the `KDPW_TR` database whether or not there are any trades with the portfolio identifier whose collateral is so reported.

Contract valuation is available in the View option of the `www` interface tabs 'Active reports' and 'Non-active reports'. Values are presented for the following fields:

- Collateralisation,
- Collateral portfolio,
- Collateral portfolio code,
- Initial margin posted,
- Currency of the initial margin posted,
- Variation margin posted,
- Currency of the variation margins posted,
- Initial margin received,
- Currency of the initial margin received,
- Variation margin received,
- Currency of the variation margins received,
- Excess collateral posted,
- Currency of the excess collateral posted,
- Excess collateral received,
- Currency of the excess collateral received.

By sending the request message `trar.rqs.001.xx`, the participant will get the trade history (including collateral).

### **AT=E (Error)**

The `AT=E` message is used to delete a report from the `KDPW_TR` database. The sections Counterparty Specific Data and Common Trade Data must provide the trade key (Reporting Counterparty Id + Id of the Other Counterparty + UTI).

**AT=E deletes all report history: no report with the same key can be accepted. The restriction applies to both counterparties.**

The deleted report is shown to TR participants in the 'Deleted reports' tab.

If KDPW\_TR EMIR receives reports for both counterparties, the deletion of the report by one counterparty blocks any modifications of the report by the other counterparty other than AT=E. Reports that are blocked (i.e., deleted by the other counterparty) are notified to the report submitting entity in a notification message `trar.ntf.001.xx` with the field Reason code populated with the value 'Trade annulled (AT=E) by the other counterparty'.

## Processing request messages (trar.rqs)

The request message trar.rqs.001.xx is used to download data according to predefined filters in XML format.

The message can be used to filter trade/position data as follows:

- selecting reports according to specific parameters (e.g., specific counterparty or specific market) valid at a given date or in a given period;
- selecting the history of a single report with a specific UTI (TradId) valid at a given date or in a given period.

Trade/position lists are filtered by defining the validity date of the data or by defining a period for reports valid in a given period. Additional fields can be used to filter data by counterparty, market, or report status.

A request concerning a single report can be used to filter trade/position data by date or period.

## Data pairing and comparing

Data reconciliation, which includes the pairing of data according to the report key (matching trade/position, counterparty and other counterparty identifiers) and the comparing of data in the report, is presented in the *Description of the Reconciliation of Details Reported to KDPW\_TR*.

## Data versioning

Following the implementation of the updated technical standards in early November 2017, data maintained in the KDPW\_TR EMIR database are presented to the participants and supervisory authorities according to the standards in the version under which the reports were filed.

Reports sent before the update of the technical standards, where the reporting entity has not updated the scope of data, are presented in the message trar.sts.001 version 02 (i.e. trar.sts.001.02) in response to any valuation/collateral update, early termination, compression, and termination on maturity and similarly in the case of the notification message, trar.ntf.001 in version 01, ie (trar.ntf.001.01), and the request message of trar.rqs.001 in version 02, (ie trar.rqs.001.02); reports consistent with the scope of information under the updated technical standards are presented in the message trar.sts.001 version 03 (i.e., trar.sts.001.03) and message trar.ntf.001 in version 02 (ie trar.ntf.001.02) and message trar.rqs.001 in version 03 (ie trar.rqs.001.03).