Joint further consultation on enhancements to the OTC derivatives reporting regime for Hong Kong to mandate – (1) the use of Unique Transaction Identifier, (2) the use of Unique Product Identifier and (3) the reporting of Critical Data Elements

and

Joint consultation conclusions on revising the list of designated jurisdictions for the masking relief

March 2024

HONG KONG MONETARY AUTHORITY
香港金融管理局

SFC 35
證監會

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Foreword

In line with the Group of 20 (**G20**) commitment to reform over-the-counter (**OTC**) derivatives markets, the Hong Kong Monetary Authority **(HKMA)** and the Securities and Futures Commission **(SFC)** have been working with the Government of the Hong Kong Special Administrative Region and relevant stakeholders on implementing a regulatory regime for the OTC derivatives market in Hong Kong.

OTC derivatives reporting is an important component of the OTC derivatives regulatory regime. We have implemented two phases of mandatory reporting, covering OTC derivatives transactions in five key asset classes — interest rates, foreign exchange, credit, commodities and equities. The use of Legal Entity Identifier (**LEI**) has also been mandated and is applicable to all entities on the reporting entity's side of a transaction.

To facilitate the aggregation of OTC derivatives data through standardisation and harmonisation of data elements, the Committee on Payments and Market Infrastructures and the International Organization of Securities Commissions (**CPMI-IOSCO**) published a technical guidance (**UTI Technical Guidance**) on the harmonisation of the unique transaction identifier (**UTI**) in February 2017, a technical guidance (**UPI Technical Guidance**) on the harmonisation of the unique product identifier (**UPI**) in September 2017, and three versions of technical guidance (**CDE Technical Guidance**) on the harmonisation of critical OTC derivatives data elements (other than the unique transaction identifier and unique product identifier) (**CDE**) in April 2018, September 2021 and September 2023. These technical guidances set out the approaches, definitions and characteristics of key reportable data elements (ie, the UTI, UPI and CDE) for authorities to consider in implementing their respective OTC derivatives reporting regimes.

To align with global developments, the HKMA and the SFC issued a joint consultation paper in April 2019 (**2019 Consultation Paper**) on mandating the use of UTI in Hong Kong and other proposals. We received a total of 15 submissions with mixed and divergent views. A list of respondents is set out in **Appendix A**. This prompted discussions on how UTI should be implemented in Hong Kong and globally. Nevertheless, there was insufficient consensus internationally and among market participants at that time.

Over the past four years, we have seen active international discussions promoted by the Committee on Derivatives Identifiers and Data Elements (**CDIDE**)[1], and controversial issues being resolved with the joint efforts of regulators and market participants worldwide. Major jurisdictions have been making progress, including launching and concluding related consultations as well as implementing UTI, UPI and CDE. We believe the time is ripe for us to conclude and further consult on the UTI framework in this paper.

In addition, we set out in this paper our proposal on mandating the use of UPI, the reporting of CDE and the adoption of the International Organization for Standardization (**ISO**) 20022 standard for the reporting obligation in Hong Kong. Furthermore, this paper provides conclusions to our consultation on revising the list of designated jurisdictions for the masking relief set out in the 2019 Consultation Paper. This paper should be read together with the 2019 Consultation Paper and all comments received, which can be viewed on the websites of the HKMA and the SFC.

[1] CDIDE is a standing working group under the Regulatory Oversight Committee of the Global Legal Entity Identifier Foundation for matters relating to the implementation and adoption of UTI, UPI and CDE.

We take this opportunity to thank everyone who took the time and effort to submit comments to the 2019 Consultation Paper. Your feedback has been most useful in helping us finalise various aspects of our regime.

For the further consultation in this paper, we invite interested parties to submit written comments on the proposals to either the HKMA or the SFC on or before 17 May 2024. Comments may be submitted by any of the following methods –

By online submission at: http://www.sfc.hk/edistributionWeb/gateway/EN/consultation/

By email to: fss@hkma.gov.hk or otcconsult@sfc.hk

By fax to: (852) 2878 7297 or (852) 2521 7917

By post to one of the following:

Financial Stability Surveillance Division
Hong Kong Monetary Authority
55/F Two International Finance Centre
8 Finance Street, Central
Hong Kong

Supervision of Markets Division
Securities and Futures Commission
54/F, One Island East
18 Westlands Road
Quarry Bay, Hong Kong

Persons submitting comments on behalf of an organisation should provide details of the organisation whose views they represent.

Please note that the names of respondents and the contents of their submissions may be published by the HKMA and the SFC on their respective websites and in other documents to be published by them. In this connection, please read the Personal Information Collection Statement attached to this consultation paper.

If you do not wish your name or submission to be published by the HKMA and the SFC, please state that you wish your name, your submission or both to be withheld from publication when you make your submission.

22 March 2024

Personal Information Collection Statement

1. This Personal Information Collection Statement (**PICS**) is made in accordance with the guidelines issued by the Privacy Commissioner for Personal Data. The PICS sets out the purposes for which your Personal Data[2] will be used following collection, what you are agreeing to with respect to the HKMA's and the SFC's use of your Personal Data and your rights under the Personal Data (Privacy) Ordinance (Cap. 486) (**PDPO**).

Purpose of collection

2. The personal data provided in your submission in response to this consultation paper may be used by the HKMA or the SFC for one or more of the following purposes –

   (a) to administer –

      (i) the provisions of the Banking Ordinance (Cap. 155) and guidelines published pursuant to the powers vested in the HKMA; and

      (ii) the relevant provisions[3] and codes and guidelines published pursuant to the powers vested in the SFC;

   (b) to perform statutory functions under the provisions of the Banking Ordinance (Cap. 155), the Securities and Futures Ordinance (Cap. 571) and relevant provisions;

   (c) for research and statistical purposes; or

   (d) for other purposes permitted by law.

Transfer of personal data

3. Personal data may be disclosed by the HKMA or the SFC to members of the public in Hong Kong and elsewhere as part of this public consultation. The names of persons who submit comments on this consultation paper, together with the whole or any part of their submissions, may be disclosed to members of the public. This will be done by publishing this information on the HKMA and the SFC websites and in documents to be published by the HKMA and the SFC during the consultation period or at its conclusion.

Access to data

4. You have the right to request access to and correction of your personal data in accordance with the provisions of the PDPO. Your right of access includes the right to obtain a copy of your personal data provided in your submission on this consultation

[2] Personal data means personal information as defined in the Personal Data (Privacy) Ordinance (Cap. 486).
[3] The term "relevant provisions" is defined in section 1 of Part 1 of Schedule 1 to the Securities and Futures Ordinance (Cap. 571) and refers to the provisions of that Ordinance together with certain provisions in the Companies (Winding Up and Miscellaneous Provisions) Ordinance (Cap. 32), the Companies Ordinance (Cap. 622) and the Anti-Money Laundering and Counter-Terrorist Financing (Financial Institutions) Ordinance (Cap. 615).

paper. The HKMA and the SFC have the right to charge a reasonable fee for processing any data access request.

Retention

5. Personal data provided to the HKMA and the SFC in response to this consultation paper will be retained for such period as may be necessary for the proper discharge of their functions.

Enquiries

6. Any enquiries regarding the personal data provided in your submission on this consultation paper, requests for access to personal data or correction of personal data should be addressed in writing to –

HKMA	**SFC**
Personal Data Privacy Officer Hong Kong Monetary Authority 55/F Two International Finance Centre 8 Finance Street Central, Hong Kong	Data Privacy Officer Securities and Futures Commission 54/F One Island East 18 Westlands Road Hong Kong

7. A copy of the Privacy Policy Statement adopted by the HKMA and the SFC is available upon request.

Executive summary

1. To keep up with international developments and ensure our OTC derivatives reporting regime stays relevant and appropriate as the markets evolve, we wish to consult the market on the following four proposals for the OTC derivatives reporting obligation (items (a) to (d)) and provide conclusions to our proposal on the masking relief (item (e)):

   (a) Mandating the use of UTI;

   (b) Mandating the use of UPI;

   (c) Mandating the reporting of CDE;

   (d) Mandating the adoption of the ISO 20022 standard; and

   (e) Maintaining the current list of designated jurisdictions for the masking relief.

Mandating the use of UTI

2. Based on the industry's feedback received from the 2019 Consultation Paper, the HKMA and the SFC have been monitoring international developments on UTI and maintaining a close dialogue with the industry to refine the proposal on UTI implementation in Hong Kong. This paper sets out our conclusions and further consultation on UTI implementation. Considering the feedback on the 2019 Consultation Paper and the latest international developments of UTI implementation, we propose to implement the mandatory use of UTI in Hong Kong on 29 September 2025 (**implementation date**). To support reporting entities in transitioning to UTI, they may continue to report the existing trade identifiers of Unique Swap Identifier (**USI**) and Unique Trade ID (**TID**) as per the current reporting requirements, or report the UTI voluntarily, until the implementation date.

3. In the meantime, we conclude that the use of UTI will be mandated for the reporting of new trades (including their subsequent life-cycle events and valuation) that take place on or after the implementation date, and that we will fully adopt the UTI Technical Guidance in the approaches to as well as the format, structure and generation logic of UTI. The proposed steps to generate UTI are based on the waterfall of factors as set out in the UTI Technical Guidance (**TG Waterfall**) and paragraph 25 of this paper. In addition, we propose to accept the use of interim-UTI to the extent as set out in paragraphs 29-32 of this paper where a reporting entity does not receive a UTI from the UTI generating entity in sufficient time for reporting. We also propose that live legacy transactions with remaining maturity of more than one year as at the implementation date will need to be re-reported in the Hong Kong Trade Repository (**HKTR**) in a new data format.

Mandating the use of UPI

4. We propose that reporting entities should provide the UPI for the underlying derivatives of each submitted reportable transaction to the HKTR on a mandatory

basis from 29 September 2025. We also propose to fully adopt the UPI Technical Guidance and the ISO 4914 standard for the structure and format of UPI.

Mandating the reporting of CDE

5. The HKMA and the SFC propose to adopt the CDE Technical Guidance as far as practicable. Our approach to implementing it is to adopt a scope that serves our regulatory purposes while maximising the data elements common to other jurisdictions and minimising the data elements unique to Hong Kong. Where certain data fields are not covered by the CDE Technical Guidance but are also required to be reported in other jurisdictions, we intend to align the definitions with those used by other jurisdictions as closely as practicable to facilitate global data aggregation and reporting. Our proposed data elements are set out in **Appendix B**. We propose that they replace the current set of data fields upon the implementation of CDE in Hong Kong from 29 September 2025.

Mandating the adoption of ISO 20022 Standard

6. The HKMA and the SFC recognise the need and benefits of a single global standard for OTC derivatives reporting, and have been collaborating with international peer regulators on the harmonisation of reporting requirements in relation to UTI, UPI and CDE. Adopting the ISO 20022 XML message standard will be a critical step for the harmonisation work. The HKMA and the SFC propose to adopt the ISO 20022 XML message format (i) for OTC derivatives reporting to the HKTR and (ii) at the same time when we implement the UTI, UPI and CDE in a "big bang" approach on the implementation date.

Conclusions on revising the list of designated jurisdictions for the masking relief

7. Under Rules 26(1) of the Securities and Futures (OTC Derivative Transactions – Reporting and Record Keeping Obligations) Rules (**Reporting Rules**), the masking relief enables reporting entities to mask the counterparty information when they report a transaction to the HKTR if they encounter reporting barriers in a jurisdiction that is designated by the SFC (**Designated List**). In 2019, we consulted the industry on revising the Designated List in view of the publication of the *Follow-up Report on Trade Reporting Legal Barriers* issued by the Financial Stability Board (**FSB**). As there is still uncertainty on whether reporting barriers remain for certain jurisdictions, especially non-FSB jurisdictions, this paper sets out our conclusion that no change will be made to the current Designated List for the masking relief. This will not cause any detrimental effect on our effort to minimise masked trades as our masking relief was cast in a way which prevents abuse when actual legal or regulatory reporting barriers no longer exist.

Timeline for submitting comments

8. Our proposals to enhance the existing reporting regime are largely in line with those requirements imposed in other major jurisdictions. Therefore, we believe market participants will have anticipated the substance of our proposals.

9. In view of the above, we propose to allow eight weeks for the submission of comments on the proposals. Comments should be submitted to the HKMA or the SFC in writing no later than 17 May 2024.

Conclusions and further consultation on mandating the use of UTI

10. To improve the transparency of OTC derivatives markets, the existing reporting requirements set out in the Supplementary Reporting Instructions for OTC Derivative Transactions (**SRI**) published by the HKMA specify that, if available, the USI reportable under the US mandatory reporting requirements and the TID reportable under the European Union (**EU**) mandatory reporting requirements must be reported as the identifying references for a transaction submitted to the HKTR.

11. We proposed to adopt UTI as an international standard in the 2019 Consultation Paper. We further proposed an implementation timeline of April 2020 for transactions that have neither a USI nor TID, and an interim measure to continue to accept USI and TID as trade identifiers until six months after both the US and the EU have adopted an international standard for UTI. At that time, we proposed to adopt a full implementation of UTI in Hong Kong. The proposals aimed to address the issue that transactions that did not involve the EU and US counterparties so far did not have a unique trade identifier.

12. Subsequent to our 2019 consultation on mandating the use of UTI for reporting obligation, the US Commodity Futures Trading Commission (**CFTC**) and the European Securities and Markets Authority (**ESMA**) proposed adopting the UTI in December 2022 and April 2024 respectively. As many OTC derivatives transactions are cross-border in nature, involving reporting requirements in multiple jurisdictions, the HKMA and the SFC have been working closely with the Monetary Authority of Singapore, Australian Securities & Investments Commission and the Japan Financial Services Agency on a coordinated implementation plan for UTI in the Asia-Pacific (**APAC**) region to ensure a smooth UTI adoption in Hong Kong.

Proposed implementation timeline and interim measure

13. We received many useful feedback and opinions on the proposed implementation timeline and interim measure in the 2019 Consultation Paper. Market participants strongly supported aligning Hong Kong's reporting requirements with international standards. Interim usage of USI and TID was also well supported so that market participants could continue to observe the UTI implementation proposals in the US and the EU. Upon our subsequent engagements with the industry, market participants also expressed concerns on implementing UTI before the ISO 20022 standard is finalised, and they wished to focus their resources on the US and the EU implementation first, and then implement UTI in the APAC region.

14. Given that the US and the EU did not have clear implementation timelines for UTI adoption at that time and that market participants did not wish that the APAC jurisdictions front-run the US and the EU on UTI implementation, we have been monitoring international developments and maintaining a close dialogue with the industry to refine the proposal for UTI implementation in Hong Kong.

15. Now with the CFTC and ESMA UTI implementation timelines announced in December 2022 and April 2024, we propose that reporting entities should provide the

UTI for each submitted reportable transaction to the HKTR on a mandatory basis from 29 September 2025. The proposed implementation timeline has taken into account that major jurisdictions will implement UTI this year [4], and that an international industry association has requested a staggered implementation of at least six months for Hong Kong after Australia and Singapore's joint implementation.

16. In addition, the implementation of UTI, together with UPI, CDE and the ISO 20022 standard, will constitute a major revamp of the OTC derivatives reporting requirements in Hong Kong. This will involve an extensive system change for both the HKTR and market participants. The proposed timeline should provide sufficient time for relevant parties to allocate adequate resources for the necessary system change. In the meantime, the HKMA and the SFC will continue to utilise the OTC derivatives data currently submitted to the HKTR for regulatory purposes until the implementation date.

Question 1

The HKMA and the SFC are seeking views on the proposal to mandate the use of UTI in submitting transactions to the HKTR from 29 September 2025. If you foresee any operational difficulties in meeting the implementation timeline, please provide specific details.

17. Considering our currently proposed timeline, an interim measure or grace period to allow for the interim use of USI and TID upon the UTI implementation in Hong Kong is no longer needed[5]. On the other hand, to support reporting entities in transitioning to the UTI, they may continue to report the existing trade identifiers of USI and TID as per the current reporting requirements, or report UTI voluntarily[6], from now until the implementation date.

Proposed requirements for reporting UTI

18. Because of the cross-border nature of OTC derivatives transactions, pursuant to other jurisdictions' reporting requirements, reporting entities may generate and submit UTI to the HKTR even before their mandatory use is implemented in Hong Kong. Reporting entities may do so as voluntary reporting. Starting from 29 September 2025, each transaction submitted to the HKTR must be identified by a single UTI based on the international standard.

19. In the 2019 Consultation Paper, we proposed that reporting entities can use the UTI generated in accordance with relevant overseas requirements, which are also

[4] In 2024, Japan will implement UTI on 1 April, the EU on 29 April, the UK on 30 September, and both Australia and Singapore on 21 October.

[5] By the time of Hong Kong's implementation, major jurisdictions should have already implemented the mandatory use of UTI, and therefore USI and TID will no longer be in use, except in legacy trades.

[6] The HKTR has revised its reporting templates from 19 December 2022 to include, among others, the "Global UTI" data field to cater to market participants' needs to include the UTI information in a transaction to be submitted to the HKTR during the transition towards UTI mandatory reporting.

consistent with the structure and format set out in the UTI Technical Guidance, to meet the proposed Hong Kong UTI requirements. We have received no objection to this proposal. UTI may be generated in Hong Kong, pursuant to Hong Kong's reporting requirements, or elsewhere, pursuant to the reporting requirements of other jurisdictions. In both scenarios, UTI based on the international standard will be equally accepted in Hong Kong.

20. To reduce the compliance burden for reporting entities, we proposed in the 2019 Consultation Paper to mandate the use of UTI only for the reporting of new trades (including their subsequent life-cycle events and valuation) that take place on or after the mandatory use of UTI is implemented on 29 September 2025. Thus, reporting entities are not required to use a UTI when reporting life-cycle events and valuation for trades that were submitted prior to the implementation date (or legacy transactions), even if the events take place on or after that date[7]. The exception is when the life-cycle event requires a new UTI to be used as set out in the UTI Technical Guidance. We have received no objection to this proposal and will proceed to require UTI only for reporting new trades (including their subsequent life-cycle events and valuation).

21. To support the mandatory use of UTI, we proposed in the 2019 Consultation Paper to adopt two data fields for the reporting of the UTI and Prior UTI, namely the "Global UTI" and "Prior global UTI". The data field "Global UTI" is for reporting the value of a UTI in a structure and format consistent with the UTI Technical Guidance, while the data field "Prior global UTI" is for reporting the UTI of a prior related transaction under a central clearing scenario. We received no objection to this proposal. The two data fields have been developed and included in the HKTR reporting templates for voluntary reporting since December 2022.

22. As mentioned in the 2019 Consultation Paper, to prepare for the implementation of the mandatory use of UTI, relevant requirements in the SRI and, where appropriate, the Frequently Asked Questions, technical specifications for reporting and the gazetted data fields for mandatory reporting will be updated after the consultation conclusions on the use of UPI, CDE and the ISO 20022 standard and further consultation conclusions on UTI are published.

Proposed responsibility for generating UTI

23. To avoid the risk of multiple UTIs being generated for the same reportable OTC derivatives transaction, only one entity should be responsible for generating the UTI. In this regard, the UTI Technical Guidance sets out the TG Waterfall for authorities to consider in allocating the responsibility for UTI generation while acknowledging that not all factors would be relevant for all jurisdictions.

24. In the 2019 Consultation Paper, we proposed introducing some flexibility to the TG Waterfall in that counterparties may bilaterally agree on whom would generate the UTI; and if a bilateral agreement could not be reached, the TG Waterfall be followed.

[7] In some cases, re-reporting of a legacy trade may be needed even though a UTI is not required. For details, please refer to the CDE proposals in this paper.

Although there is general support for the adoption of the TG Waterfall, there were mixed views on whether the flexibility of a bilateral agreement should be put in place before the TG Waterfall. Some respondents considered this would create unnecessary uncertainty, complexity and potential fragmentation in the UTI generation logic, and would pose operational difficulties for reporting entities with a large counterparty base. In contrast, another respondent agreed that the bilateral agreement mechanism would allow for flexible approaches at financial institutions' discretion.

25. We have considered the industry's feedback and had subsequent discussions with market participants. Taking into account the latest UTI developments (eg, a bilateral agreement before the TG Waterfall is not implemented by other major jurisdictions), we now do not propose to provide the flexibility for bilateral agreements. We would like to further consult the market and propose that reporting entities shall adopt the steps (a)–(e) below to determine the entity responsible for generating the UTI. These steps are based on the TG Waterfall and are largely equivalent to those adopted by other major jurisdictions, eg, the final EU REFIT rules published by ESMA. We recognise a harmonised UTI generation logic is crucial to ensure seamless pairing and sharing of UTI and reduce complexity for reporting entities with multiple reporting obligations. The proposed steps are:

(a) for cleared OTC derivatives transactions other than OTC derivatives transactions between two central counterparties (**CCPs**), the UTI shall be generated at the point of clearing by the CCP for clearing members. A different UTI shall be generated by a clearing member for its counterparty for a trade in which the CCP is not a counterparty;

(b) for OTC derivatives transactions which are centrally executed but not centrally cleared, the UTI shall be generated by the venue of execution for its member;

(c) for OTC derivatives transactions other than those referred to in points (a) and (b), where either counterparty is subject to the reporting requirements in a jurisdiction outside Hong Kong[8], the UTI shall be generated pursuant to the rules of the jurisdiction of the counterparty that must first comply with those reporting requirements.

Where the counterparty subject to reporting must first comply with Hong Kong's reporting requirements, the following entities shall be responsible for generating the UTI:

(i) for OTC derivatives transactions that were centrally confirmed by electronic means, the trade confirmation platform at the point of confirmation;

[8] In determining whether a counterparty is subject to the reporting requirements in a jurisdiction outside Hong Kong in the UTI generation logic, the nexus element of a "conducted in Hong Kong" transaction as set out in Rule 4 of the Reporting Rules should be disregarded, ie, only the *counterparty's* reporting requirements should be considered.

(ii) for all other OTC derivatives transactions, the counterparties shall agree on the entity responsible for generating the UTI. Where the counterparties fail to agree, the counterparty whose LEI[9] is first based on sorting the identifiers of the counterparties with the characters of the identifier reversed shall be responsible for the generation[10].

Where the applicable laws of the relevant jurisdiction outside Hong Kong provide for the same reporting deadline as the one applicable to the counterparty subject to Hong Kong's reporting requirements, the counterparties shall agree on the entity responsible for generating the UTI.

Where the counterparties fail to agree, and the OTC derivatives transaction was centrally confirmed by electronic means, the UTI shall be generated by the trade confirmation platform at the point of confirmation.

If the UTI cannot be generated by the trade confirmation platform at the point of confirmation, and the details of the OTC derivatives transaction have to be reported to a single trade repository, that trade repository shall be responsible for generating the UTI.

If the UTI cannot be generated by the trade repository to which the details of the OTC derivatives transaction have been reported, the counterparty whose LEI[11] is first based on sorting the identifiers of the counterparties with the characters reversed shall be responsible for UTI generation;

(d) for OTC derivatives transactions other than those referred to in points (a), (b) and (c), that were centrally confirmed by electronic means, the UTI shall be generated by the trade confirmation platform at the point of confirmation;

(e) for all OTC derivatives transactions other than those referred to in points (a) to (d), the following shall apply:

(i) where reporting counterparties [12] conclude an OTC derivatives transaction with non-reporting counterparties, the reporting counterparties shall generate the UTI;

(ii) for all OTC derivatives transactions other than those referred to in point (i), the counterparties shall agree on the entity responsible for generating the UTI. Where the counterparties fail to agree, the counterparty whose LEI[13] is first based on sorting the identifiers of the

[9] If Trade Party 2 does not have an LEI, Trade Party 1 should generate the UTI.
[10] To avoid any prefix of an LEI determining which entity to generate the UTI, a direct comparison of the characters of the counterparties' LEI is not adopted. Instead, a more random way of comparison by comparing the reverse order of such characters is adopted.
[11] If Trade Party 2 does not have an LEI, Trade Party 1 should generate the UTI.
[12] In determining whether a counterparty is a reporting counterparty in the UTI generation logic, the nexus element of a "conducted in Hong Kong" transaction as set out in Rule 4 of the Reporting Rules should be disregarded, ie, only the *counterparty's* reporting obligation should be considered.
[13] If Trade Party 2 does not have an LEI, Trade Party 1 should generate the UTI.

counterparties with the characters of the identifier reversed shall be responsible for UTI generation.

Question 2

Do you have any comments or concerns about the proposed steps for counterparties to determine the entity responsible for UTI generation? If you foresee any operational difficulties in implementing the proposals, please provide specific details.

Proposed approaches to UTI

26. In the 2019 Consultation Paper, we proposed to fully adopt the characteristics and approaches to UTI as set out in the UTI Technical Guidance, including situations where the same UTI should be kept or a different UTI should be generated. We received support from market participants on aligning our approaches to UTI with that in the UTI Technical Guidance. We will therefore adopt the approaches to UTI as proposed.

Proposed structure and format of UTI

27. In the 2019 Consultation Paper, we proposed to fully adopt the structure and format of UTI as set out in the UTI Technical Guidance, including how UTI should be constructed and the maximum number of characters forming UTI. We received support from market participants on aligning the structure and format of UTI with those in the UTI Technical Guidance. We will therefore adopt the structure and format of UTI as proposed.

28. In August 2020, the ISO published the data standard for UTI, and the structure and format of UTI are specified in ISO 23897[14]. We have accommodated the ISO 23897 standard for the UTI format in implementing UTI.

Responsibility to provide or obtain UTI in a timely manner

29. The UTI Technical Guidance sets out that UTI must be generated, shared and paired [15] (to the extent necessary) with other entities in time for all applicable reporting obligations. The HKMA and the SFC generally expect UTI to be generated in a timely manner for all relevant entities to comply with their reporting deadlines, pursuant to the reporting requirements of Hong Kong or other jurisdictions. To facilitate the timely identification of the entity generating the UTI, we encourage the entity responsible for generating the UTI (which may or may not be a reporting entity)

[14] ISO 23897:2020 Financial services — Unique transaction identifier (UTI) (https://www.iso.org/standard/77308.html).

[15] The shared and paired UTI would help facilitate the linking and matching arrangements in the upcoming UTI implementation.

to inform its counterparties or clients whether it will generate a UTI or delegate another party to generate a UTI.

30. Where a reporting entity is responsible for generating the UTI, it should make reasonable efforts to provide the UTI in a timely manner to any entity who requests for the UTI to comply with relevant reporting requirements.

31. If a reporting entity is not the entity responsible for generating the UTI, it should make reasonable efforts to obtain the UTI in a timely manner, whether from the UTI generating entity or a counterparty to the OTC derivatives transaction, in order to comply with the reporting requirements. We expect reporting entities to establish internal policies and arrangements to obtain UTI in a timely manner.

32. In the event that the reporting entity does not receive a UTI from the UTI generating entity in sufficient time for reporting, we propose that the reporting entity should generate its own UTI[16] (in a format based on the UTI Technical Guidance) as an interim-UTI for reporting purposes and continue to make reasonable efforts to obtain the UTI from the UTI generating entity. Where the reporting entity subsequently obtains the UTI, it should report the UTI no later than two business days after obtaining the UTI.

Question 3

Do you have any comments or concerns about the proposals to require reporting entities to:

(a) make reasonable efforts to provide or obtain a UTI in a timely manner;

(b) report an interim-UTI where it is unable to obtain the UTI despite having made reasonable efforts; and

(c) subsequently report the UTI within two business days after obtaining the UTI?

If you foresee any operational difficulties in implementing the proposals or have other comments, please provide specific details.

[16] If it is not technically feasible for a reporting entity to generate the UTI, it may report an internally generated code as an interim-UTI.

Consultation on mandating the use of UPI

33. The UPI is one of the international harmonised standards for reporting financial transaction data, for which the CPMI-IOSCO has developed the UPI Technical Guidance. The UPI aims to denote a specific OTC derivatives product reported to a trade repository to facilitate global data aggregation in the OTC derivatives market.

34. The UPI is a 12-character reference code to uniquely identify an OTC derivatives product reported to trade repositories. Each UPI code is mapped to a set of reference data elements with specific values that together describe the product. The combination of the UPI code, UPI reference data and the process of a UPI service provider assigning a UPI code to a particular set of reference data represents the UPI System.

35. UPI service provider(s) provide for the timely issuance of UPI codes and maintain the associated reference data in the UPI Reference Data Library, which is accessible to authorities and market participants. Authorities and market participants may locate the UPI code in the reference data library with the UPI reference data elements and values that pertain to a particular product for reporting to trade repositories.

36. Examples of reference data stored in the UPI Reference Data Library include each OTC derivatives product's asset class, currency pair, delivery type, instrument type, option style, option type, underlying asset type and underlier ID.

37. In May 2019, the FSB designated the Derivatives Service Bureau (**DSB**)[17] as the service provider for the UPI System[18]. As the sole issuer of UPI codes, the DSB is also the operator of the UPI Reference Data Library. In the fourth quarter of 2023, the DSB launched the UPI Service for OTC derivatives products to facilitate the reporting and aggregation of data on OTC derivatives transactions globally.

Proposed structure and format of UPI

38. The key characteristics of the UPI as set out in the UPI Technical Guidance satisfy the various principles that are necessary for a unique identifier that identifies an OTC derivatives product, including its uniqueness, consistency, clarity, jurisdiction neutrality, ease of assignment / retrieval / query and adaptability. To harmonise with the international standard, we propose to fully adopt the UPI Technical Guidance for the structure and format of UPI.

[17] DSB is a subsidiary of the Association of National Numbering Agencies, which is a global numbering agency for OTC derivatives serving the needs of market participants through the allocation of globally recognised and adopted ISO standards, such as International Securities Identification Number (ISIN), the Classification of Financial Instruments (CFI) and Financial Instrument Short Name (FISN), for identifying, classifying and describing financial instruments.

[18] FSB designated DSB as the Unique Product Identifier (UPI) Service Provider: (https://www.fsb.org/2019/05/fsb-designates-dsb-as-unique-product-identifier-upi-service-provider/).

39. In November 2021, the ISO published the data standard for UPI, and the structure and format of UPI are specified in ISO 4914[19]. We also propose to fully adopt the ISO 4914 standard for the UPI format in the HKTR reporting templates.

Proposed approaches to the implementation of UPI

40. We propose that reporting entities should provide the UPI for the derivatives of each submitted reportable transaction to the HKTR on a mandatory basis from 29 September 2025. However, as the UPI service is a new set-up, we will keep in view the developments of the UPI System and align our practice with other regulators' by maintaining certain product-related data fields in the reporting requirements. We will consider removing those product-related data fields at a later stage if the information is also available in the UPI system.

Question 4

The HKMA and the SFC are seeking views on the proposed approaches to the UPIs:

(a) the proposal to fully adopt the UPI Technical Guidance and the ISO 4914 standard for the structure and format of UPI to be implemented in Hong Kong; and

(b) the proposal to mandate the use of the UPI for the underlying derivatives of each submitted reportable transaction to the HKTR from 29 September 2025.

If you foresee any operational difficulties in meeting the implementation timeline or have other comments, please provide specific details.

[19] ISO 4914:2021 Financial services — Unique product identifier (UPI) (https://www.iso.org/standard/80506.html).

Consultation on mandating the reporting of CDE

41. The CDE is a set of derivatives transaction data elements (other than UTI and UPI) and formats and, where relevant, allowable values. It is intended to be the universe of data elements for regulators to draw from to form their individual data sets. For each data element, the CDE Technical Guidance sets out a definition, an existing industry standard (if applicable), a format and the allowable values. Standardisation allows market participants to gain a better understanding of data requirements, and the adoption of CDE promotes transparency in OTC derivatives transactions and facilitates data aggregation across data sets.

42. Adopting data elements from the CDE Technical Guidance for reporting will be beneficial to regulators and reporting entities in:

(a) expanding the data set for important data elements not under the current reporting requirements;

(b) transforming data elements which are unique to Hong Kong's existing reporting requirements into the internationally-aligned standard;

(c) simplifying the process for entities that report under Hong Kong's requirements as well as other jurisdictions' as the content in the transaction reports may not be significantly different across jurisdictions; and

(d) standardising the definitions of data elements, formats and allowable values to reduce ambiguity and complexity for reporting entities as well as improve the conformance and consistency in data values reported.

Proposed approaches to CDE

43. The HKMA and the SFC propose to adopt the CDE Technical Guidance as far as practicable. Our approach to implementing this technical guidance is to adopt a scope that serves our regulatory purposes while maximising the data elements that are common to other jurisdictions and minimising the data elements that are unique to Hong Kong.

44. The HKMA and the SFC propose to revamp the existing data fields to align with the definitions of and reporting requirements for data elements specified in the CDE Technical Guidance as closely as possible. Where there are data fields not covered by the CDE Technical Guidance but are also required to be reported in other jurisdictions, we intend to align the definitions with those used by other jurisdictions as closely as practicable to facilitate global data aggregation and reporting.

45. The data elements we propose for Hong Kong's reporting requirements are set out in Appendix B. They will replace the current set of data fields upon the implementation of CDE in Hong Kong. Appendix B contains data elements which are:

(a) sourced from the CDE Technical Guidance;

(b) sourced from other jurisdictions' requirements; and

(c) administrative data fields which facilitate the HKTR's operation and are currently required for reporting.

46. For each CDE, the CDE Technical Guidance sets out a definition, existing industry standard (if applicable), format and the allowable values for the data element. For data elements sourced from other jurisdictions that are not CDEs, those sources also set out the definitions, formats and allowable values. For the data elements that are existing administrative data fields, we propose using the definitions, formats and allowable values under existing reporting requirements.

47. The proposed major changes to the existing data elements include:

(a) Adoption of data elements related to collateral and margins specified in the CDE Technical Guidance;

(b) Adoption of data elements related to lifecycle events specified by the CDE Technical Guidance;

(c) Substitution of asset class- or product-specific data elements with more generic, cross-asset class elements along with the implementation of UPI; and

(d) Removal of a number of Party Type- and Party Name-related sub-fields to align with the CDE Technical Guidance and requirements proposed in other jurisdictions[20].

Question 5

The HKMA and the SFC are seeking comments on the proposed data elements and their definitions, formats and allowable values as set out in Appendix B. If there are data elements that you consider should be excluded or modified, or that you foresee any operational difficulties in implementing the proposal, please provide specific details and elaborate on the rationale.

Question 6

Do you consider there are other data elements that the HKMA and the SFC should include in Appendix B? If so, please suggest the data elements together with the purposes, definitions, formats and allowable values of the suggested data elements.

[20] LEI is proposed as the entity identifier to identify all entities involved in OTC derivatives transactions in the CDE Technical Guidance.

Data elements related to the direction of the transaction (corresponding to data fields no.9 to 11 of Appendix B)

48. The CDE Technical Guidance has identified two ways to report information related to the direction (ie, buyer, seller, payer or receiver) of the trade: (1) to report the direction of the trade from the reporting entity's perspective[21], or (2) to report the identifier of the counterparty for each direction. The HKMA and the SFC propose to adopt the former by reporting the direction of the trade from the reporting entity's perspective, which is the common approach adopted by ESMA and some APAC jurisdictions[22].

Data elements related to collateral & margin (corresponding to data fields no.37 to 55, 156 to 158 and no. 192 of Appendix B)

49. In addition to the proposed data element "Collateral portfolio code" (data field no. 38 of Appendix B), which is specified in the CDE Technical Guidance, we propose to adopt two additional collateral portfolio codes "Initial margin collateral portfolio code" and "Variation margin collateral portfolio code" (data fields no. 156 and 158 of Appendix B), which are required by the CFTC and also proposed by some APAC jurisdictions[23]. We learnt from the industry's consultation feedback from other jurisdictions that each OTC derivatives transaction may be treated differently for the purposes of margining in accordance with a collateral agreement between the parties, and also the separation of initial margin and variation margin would make reporting easier as the amounts may be recorded separately in the reporting entities' systems. As such, we intend to mandate the "Initial margin collateral portfolio code" and "Variation margin collateral portfolio code", if applicable, for the identification of collateral portfolios. The HKMA and the SFC will update relevant requirements in the SRI to give further guidance on how to report collateral when there is no collateral portfolio or only a single collateral portfolio.

Data elements related to lifecycle events (corresponding to data fields no.136 to 139 of Appendix B)

50. The set of data elements related to lifecycle events includes "Action Type", "Event type", "Event timestamp" and "Event identifier", and are included in the Revised CDE Technical Guidance – version 3 released by the Regulatory Oversight Committee in September 2023. It provides a harmonised approach for reporting entities to report lifecycle events and allows regulators to track the history of material lifecycle events and amendments made to reported transactions for better transparency in the OTC derivatives market. While the reporting methodologies related to lifecycle events exist in various forms across different jurisdictions at present, a lack of uniformity limits the value for aggregation of data.

51. The HKMA and the SFC propose to adopt the CDE data elements related to the lifecycle events as set out in the Revised CDE Technical Guidance – version 3 for Hong Kong's reporting requirements. These data elements enhance a better

[21] In the case of a reporting entity acting as an agent in relation to the OTC derivatives transaction, this refers to the perspective of the counterparty to the transaction that the reporting entity is acting for.
[22] Australia, Japan and Singapore also adopt the first approach.
[23] Australia and Japan also require two collateral portfolio codes.

understanding of the lifecycle of an OTC derivatives transaction, including what action is applied (Action type), what event is causing such action (Event type) and when a given lifecycle event takes place (Event timestamp). In the case of many-to-many relations, such as a compression or credit event, an Event identifier allows regulators to link multiple OTC derivatives transactions pertaining to the same event, when they cannot be linked by other transaction identifiers, such as the "Prior UTI".

Data elements related to barrier strike values and secondary transaction identifier (corresponding to data fields no.201 to 203 of Appendix B)

52. We are aware that proposals are being made by some authorities to the CDIDE for including in the ISO message standard 3 additional data fields, namely "Lower or only barrier", "Upper barrier" and "Secondary transaction identifier". The purposes are to facilitate the reporting of strike values for barrier options and accommodate market participants' request to have a data field for the internal client code. We understand that the CDIDE process related to these three additional data fields will be completed soon, we consider that these data fields suit our regulatory needs and propose to adopt them in the format to be set out in the ISO message standard.

Question 7

The HKMA and the SFC are seeking comments on the proposals regarding the above data elements for Hong Kong's reporting requirements. If you foresee any operational difficulties in implementing the proposal or have other comments, please provide specific details.

Proposed implementation timeline

53. Regulators across jurisdictions are making changes to their OTC derivatives reporting regimes to implement the UTI, UPI and CDE technical guidances. It could be resource-intensive for reporting entities with global operations to simultaneously implement changes to their systems and processes across different jurisdictions. To allow reporting entities sufficient time to prepare for implementation, and to maintain a simple "big bang" approach to roll out UTI, UPI and CDE in one go, the HKMA and the SFC intend to implement the reporting requirements as set out in Appendix B on 29 September 2025.

54. Having considered the implementation dates in major jurisdictions such as the US, EU, UK, Japan, Australia and Singapore, and having considered the time needed for system upgrades, the proposed implementation date for Hong Kong will mitigate conflicts with the preparation and implementation of similar data harmonisation exercises put forward by these jurisdictions. This gives market participants more than 18 months from the issuance of this paper (and we expect more than 12 months from the issuance of the conclusions to this paper) to prepare for implementation in Hong Kong.

Question 8

Do you foresee any difficulties in implementing the list of proposed data elements specified in Appendix B for OTC derivatives trade reporting on the implementation date? If so, please specify the data field(s) and provide specific details and reasons.

Proposed treatment of live legacy transactions and other transitional issues

55. For live legacy transactions, ie, transactions entered into prior to the implementation date of the proposed reporting requirements but have not yet matured, been terminated, quitted or withdrawn, the HKMA and the SFC propose to require the re-reporting of live legacy transactions (other than UTIs and UPIs) and adopt the proposed reporting requirements (ie, in the new reporting format) only if the transaction has remaining maturity of more than one year as at the implementation date. We propose that reporting entities be provided six months from the implementation date to report those live legacy transactions as they may need time to gather the information required under the proposed reporting requirements. This approach strikes a balance between the regulators' surveillance needs for the new data set in respect of long-dated transactions and market participants' compliance burden in re-reporting legacy transactions. Our proposal is in line with that adopted by other major APAC jurisdictions. The HKMA and the SFC will update relevant requirements in the SRI to provide further guidance to the industry.

56. Once the live legacy transaction is re-reported (whether on the last day of the six-month transition period or before that), any amendments to the transaction will need to be reported in the new reporting format within two business days.

57. For live legacy transactions with maturity of more than one year from the implementation date (ie, live legacy transactions required to be re-reported), before the transaction is re-reported, where there is an update of content[24] to any of the existing required data fields in the six-month transition period, reporting entities are required to continue to report such updates using the pre-implementation reporting templates (ie, the existing reporting templates for submitting trades to the HKTR before the implementation of UTI, UPI and CDE) within two business days.

58. For live legacy transactions maturing within one year from the implementation date (ie, live legacy transactions not required to be re-reported), where there is an update of content to any of the existing required data fields after the implementation date, reporting entities are required to continue to report such updates in the pre-implementation reporting templates until the transactions mature, are terminated, quitted or withdrawn.

[24] Irrespective of whether such an update is a lifecycle event, error amendment or a backload of a transaction.

59. For completeness, “dead” legacy transactions (ie, transactions entered into prior to the implementation date but have matured, been terminated, quitted or withdrawn before that date) are not required to be re-reported to the HKTR in the new reporting format.

Question 9

Do you have any comments or concerns on the below?

(a) The proposed approach of requiring re-reporting of live legacy transactions with maturity of more than one year as at the implementation date, and providing a six-month transition period for these reportable legacy transactions to be re-reported; and

(b) Are there any particular data fields that a reporting entity may find challenging in re-reporting a legacy transaction? If so, please specify the data field(s) and provide specific details.

Consultation on adoption of the ISO 20022 Standard

60. ISO 20022 is an agreed framework and methodology used by the global financial industry to create consistent message standards across business processes. It can assist in standardising the reporting of OTC derivatives transactions internationally. For reporting entities with multi-jurisdictional reporting requirements and trade repositories and providers of reporting services operating in multiple jurisdictions, we see significant benefits in forming, transmitting and receiving OTC derivatives transaction information based on a common form of message.

61. As set out in the CPMI-IOSCO *Governance Arrangements for Critical OTC Derivatives Data Elements (Other Than UTI and UPI)* published in October 2019, CDE data elements will be included in the ISO 20022 data dictionary and an ISO 20022 XML message format has been developed for OTC derivatives reporting[25]. The standard was required by the US and EU authorities for OTC derivatives reporting and was proposed to be adopted by some APAC authorities.

62. The HKMA and the SFC have been collaborating with a number of international peer regulators and are seeking to harmonise, to the extent practicable, with other jurisdictions in relation to the UTI, UPI and CDE requirements for OTC derivatives reporting. Adopting the ISO 20022 XML message standard would be another harmonising step.

63. The HKMA and the SFC recognise the need and benefits of a single global standard for OTC derivatives reporting in the long run and propose to adopt the ISO 20022 XML message format (i) for OTC derivatives reporting to the HKTR and (ii) at the same time as we implement UTI, UPI and CDE in a "big bang" approach on 29 September 2025. The proposed implementation date will provide sufficient time for market participants to make necessary system changes to enable the adoption and usage of the ISO 20022 message standard[26].

Question 10

The HKMA and the SFC are seeking comments on the adoption of the ISO 20022 XML message standard for OTC derivatives reporting to the HKTR and on implementing ISO 20022 XML message standard at the same time when we implement the UTI, UPI and CDE. If you foresee any operational difficulties in implementing the proposals, please provide specific details.

[25] Governance Arrangements for Critical OTC Derivatives Data Elements (Other Than UTI and UPI): https://www.bis.org/cpmi/publ/d186.pdf.

[26] In order to accommodate the corresponding revamp, certain functions in respect of the HKTR system reports and user interface will be rolled out at a later date under the ISO implementation.

Conclusions on revising the list of designated jurisdictions for the masking relief

64. When the first phase of OTC derivatives reporting took effect in July 2015, we introduced a masking relief to deal with situations where a reporting entity is prevented from reporting certain information identifying the counterparty (**Counterparty Information**) to the HKMA via the HKTR due to a conflicting confidentiality obligation (or other requirements) under the laws of another jurisdiction. The current masking relief under Rule 26(1) of the Reporting Rules enables reporting entities to mask the Counterparty Information when they report a transaction to the HKMA via the HKTR if both of the following preconditions are fulfilled:

(a) The submission of Counterparty Information is prohibited under the laws of, or by an authority or regulatory organisation in, a jurisdiction; and

(b) This jurisdiction is designated by the SFC (on the **Designated List**).

65. The purpose of the masking relief is to give some degree of flexibility to reporting entities who face an actual legal or regulatory prohibition of reporting Counterparty Information. It was cast in a way that when a jurisdiction in the Designated List removes its prohibition (ie, the first precondition in paragraph 64(a) is no longer satisfied), the reporting entities can no longer rely on the masking relief in respect of that jurisdiction. The current Designated List was gazetted on 7 July 2015 and consists of 18 jurisdictions (**Appendix C**).

66. Over the past few years, many regulators across the globe have worked towards removing legal prohibitions that may prevent the reporting of Counterparty Information to trade repositories. The FSB issued a report[27] in 2018 to review the related progress and re-categorise a number of jurisdictions as having either reporting barriers which are curable by standing consent or no such barriers. In view of the FSB report and as a housekeeping exercise, we proposed in the 2019 Consultation Paper to review the Designated List by removing some jurisdictions from the list.

67. We received mixed feedback on this matter in the 2019 Consultation Paper. Out of the 15 responses to this consultation, two respondents expressly supported the proposal. However, one respondent asserted that one of the non-FSB jurisdictions that we proposed to remove from the Designated List had only removed reporting barriers in respect of reporting to trade repositories in a certain region, but reporting barrier still existed when reporting was made to trade repositories outside of that region, such as the HKTR.

68. An international industry association expressed concerns on behalf of its members about the lack of official and formal clarity from specific APAC jurisdictions on whether any legal or regulatory prohibition to reporting remains.

[27] See the FSB's *Trade reporting legal barriers: Follow-up of 2015 peer review recommendations* issued in November 2018: https://www.fsb.org/wp-content/uploads/P191118-4.pdf.

69. We recognise that there is still uncertainty on whether reporting barriers remain for certain jurisdictions, especially non-FSB jurisdictions, which were not covered extensively in the FSB's 2018 report. As stated before, our masking relief was cast in a way that would prevent abuse when actual legal or regulatory prohibition no longer exists, even when the relevant jurisdiction remains on the Designated List. In other words, maintaining the status quo in the Designated List would not cause any detrimental effect on our effort to minimise masked trades. In fact, the volume of trades submitted to the HKTR with masked Counterparty Information is currently insignificant.

70. In the meantime, we fully acknowledge the amount of work and resources market participants will need for the UTI, UPI, CDE and the ISO 20022 standard to be implemented globally in the upcoming harmonisation exercise. In view of all these factors, we will not make any changes to the Designated List at this time.

71. That said, we wish to remind reporting entities that the Designated List is not intended to enable them to automatically mask Counterparty Information when transacting with counterparties from any of those jurisdictions. Rather, they should carry out reasonable due diligence to ensure that the first precondition for the masking relief (ie, actual legal or regulatory prohibition) is still valid.

The way forward

72. The HKMA and the SFC continue to ensure that our OTC derivatives reporting regime remains relevant and up-to-date. The proposals in this paper have been developed in response to the global call for OTC derivatives data harmonisation and similar reform efforts in other major markets. We believe our proposals strike the right balance between the need for transparency in the OTC derivatives market and addressing market concerns. As always, we welcome market views on the proposals. Interested parties are invited to submit written comments on our proposals to either the HKMA or the SFC on or before 17 May 2024. Please refer to the Foreword for the methods of submission.

Appendix A – List of respondents

(In alphabetical order)

Respondent has no objection to publication of name and content of submission

1. CME Group
2. Depository Trust and Clearing Corporation
3. Global Financial Markets Association
4. Global Legal Entity Identifier Foundation
5. Hong Kong Bar Association
6. IHS Markit (merged with S&P Global)
7. International Swaps and Derivatives Association
8. Japanese Bankers Association
9. Private Wealth Management Association
10. The DTC Association
11. The Hong Kong Association of Banks
12. The Law Society of Hong Kong

Respondent requested submission to be published on a "no-name" basis

One submission

Respondent requested that both name and submission to be withheld from publication

Two submissions

Appendix B – List of proposed data elements for reporting

Appendix B to the Consultation Paper - List of Proposed Data Elements

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	Data element applicable to asset class				
				IR	FX	EQ	CD	CM
1	Effective date	Unadjusted date at which obligations under the OTC derivative transaction come into effect, as included in the confirmation, if applicable. If the effective date is not specified as part of the terms of the contract, the counterparties shall report in this field the date of execution of the derivative.	ISO 8601 YYYY-MM-DD, based on UTC.	✓	✓	✓	✓	✓
2	Expiration date	Unadjusted date at which obligations under the OTC derivative transaction stop being effective, as included in the confirmation, if applicable. Early termination does not affect this data element.	ISO 8601 YYYY-MM-DD, based on UTC.	✓	✓	✓	✓	✓
3	Early termination date	Effective date of the early termination (expiry) of the reported transaction, if applicable. This data element is applicable if the termination of the transaction occurs prior to its maturity due to an ex-interim decision of a counterparty (or counterparties). Examples of early terminations (expiry) are: negotiated early termination; early termination under an optional early termination provision ("mutual put"); novation; offsetting (netting) transaction; option exercise; compression; early termination clause specified in the original contract which is a callable swap (bought embedded option); mutual credit break.	ISO 8601 YYYY-MM-DD, based on UTC.	✓	✓	✓	✓	✓
4	Reporting timestamp	Date and time of the submission of the report as reported to the trade repository.	ISO 8601 YYYY-MM-DDThh:mm:ssZ, based on UTC.	✓	✓	✓	✓	✓
5	Execution timestamp	Date and time a transaction was originally executed, resulting in the generation of a new UTI. This data element remains unchanged throughout the life of the UTI.	ISO 8601 YYYY-MM-DDThh:mm:ssZ, based on UTC.	✓	✓	✓	✓	✓
6	Counterparty 1	Identifier of the counterparty to an OTC derivative transaction.	ISO 17442 Legal Entity Identifier (LEI) Char(20) LEI code that is included in the LEI data as published by the Global LEI Foundation (GLEIF, www.gleif.org/).	✓	✓	✓	✓	✓
7	Counterparty 2	Identifier of the second counterparty to an OTC derivative transaction.	ISO 17442 Legal Entity Identifier (LEI) Char(20) for an LEI code Varchar(72) natural persons who are acting as private individuals (not eligible for an LEI per the ROC Statement - Individuals Acting in a Business Capacity). LEI code that is included in the LEI data as published by the Global LEI Foundation (GLEIF, www.gleif.org/). For natural persons who are acting as private individuals (not eligible for an LEI per the ROC Statement - Individuals Acting in a Business Capacity): LEI of the reporting counterparty followed by a unique identifier assigned and maintained consistently by the reporting counterparty for that natural person(s) for regulatory reporting purpose.	✓	✓	✓	✓	✓
8	Counterparty 2 identifier type indicator	Indicator of whether LEI was used to identify the Counterparty 2.	Boolean: true, for Legal entities false, for natural persons who are acting as private individuals (not eligible for an LEI per the ROC Statement - Individuals Acting in a Business Capacity)	✓	✓	✓	✓	✓
9	Direction 1	Indicator of whether the counterparty 1 is the buyer or the seller as determined at the time of the transaction, if applicable.	Char(4) Allowable values: BYER = buyer SLLR = seller	✓	✓	✓	✓	✓
10	Direction 2 - Leg 1	Indicator of whether the counterparty 1 is the payer or the receiver of leg 1 as determined at the time of the conclusion of the derivative, if applicable.	Char(4) Allowable values: MAKE = payer TAKE = receiver	✓	✓	✓	✓	✓
11	Direction 2 - Leg 2	Indicator of whether the counterparty 1 is the payer or the receiver of leg 2 as determined at the time of the conclusion of the derivative, if applicable.	Char(4) Allowable values: MAKE = payer TAKE = receiver	✓	✓	✓	✓	✓
12	Cleared	Indicator of whether the transaction has been cleared, or is intended to be cleared, by a central counterparty.	Char(1) Allowable values: Y= yes, centrally cleared, for beta and gamma transactions. N= no, not centrally cleared. I= intent to clear, for alpha transactions that are planned to be submitted to clearing.	✓	✓	✓	✓	✓
13	Central counterparty	Identifier of the central counterparty that cleared the transaction, if applicable. This data element is not applicable if the value of the data element "Cleared" is "N" ("No, not centrally cleared") or "I" ("Intent to clear").	ISO 17442 Legal Entity Identifier (LEI) Char(20) LEI code that is included in the LEI data as published by the Global LEI Foundation (GLEIF, www.gleif.org/).	✓	✓	✓	✓	✓
14	Clearing member	Identifier of the clearing member through which a derivative transaction was cleared at a central counterparty, if applicable. This data element is applicable to cleared transactions under both the agency clearing model and the principal clearing model. • In the case of the principal clearing model, the clearing member is identified as clearing member and also as a counterparty in both transactions resulting from clearing: (i) in the transaction between the central counterparty and the clearing member; and (ii) in the transaction between the clearing member and the counterparty to the original alpha transaction. • In the case of the agency clearing model, the clearing member is identified as clearing member but not as the counterparty to transactions resulting from clearing. Under this model, the counterparties are the central counterparty and the client. This data element is not applicable if the value of the data element "Cleared" is "N" ("No, not centrally cleared") or "I" ("Intent to clear").	ISO 17442 Legal Entity Identifier (LEI) Char(20) LEI code that is included in the LEI data as published by the Global LEI Foundation (GLEIF, www.gleif.org/).	✓	✓	✓	✓	✓

Appendix B to the Consultation Paper - List of Proposed Data Elements

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	Data element applicable to asset class				
				IR	FX	EQ	CD	CM
15	Platform identifier	Identifier of the trading facility (eg exchange, multilateral trading facility, swap execution facility) on which the transaction was executed, if applicable.	ISO 10383 Segment Market Identifier Code (MIC) Char(4) Allowable values: ISO 10383 segment MIC code. If no trading facility was involved in the transaction: XOFF, for transactions in listed instruments XXXX, for transactions in instruments that are not listed in any venue BILT, if the reporting counterparty cannot determine whether the instrument is listed or not, as per jurisdictional requirements.	✓	✓	✓	✓	✓
16	Confirmed	For new reportable transactions (as defined by the CPMI-IOSCO Technical Guidance: Harmonisation of the Unique Transaction Identifier), whether the Legally binding terms of an OTC derivatives contract were documented and agreed upon (confirmed) or not (unconfirmed). If documented and agreed, whether such confirmation was done: • via a shared confirmation facility or platform, or a private/bilateral electronic system (electronic); • via a human-readable written document, such as fax, paper or manually processed e-mails (non- electronic).	ISO 20022: SecuritiesTradeStatus/TradeConfirmationStatus Char(4) NCNF = unconfirmed ECNF = electronic YCNF = non-electronic	✓	✓	✓	✓	✓
17	Final contractual settlement date	Unadjusted date as per the contract, by which all transfer of cash or assets should take place and the counterparties should no longer have any outstanding obligations to each other under that contract, if applicable. For products that may not have a final contractual settlement date (eg American options), this data element reflects the date by which the transfer of cash or asset would take place if termination were to occur on the expiration date.	ISO 8601 YYYY-MM-DD, based on UTC.	✓	✓	✓	✓	✓
18	Settlement currency - Leg 1	Currency for the cash settlement of the transaction when applicable. For multicurrency products that do not net, the settlement currency of the leg 1. This data element is not applicable for physically settled products (eg physically settled swaptions).	ISO 4217 Char(3) Allowable values: Currencies included in ISO 4217	✓	✓	✓	✓	✓
19	Settlement currency - Leg 2	Currency for the cash settlement of the transaction when applicable. For multicurrency products that do not net, the settlement currency of the leg 2. This data element is not applicable for physically settled products (eg physically settled swaptions).	ISO 4217 Char(3) Allowable values: Currencies included in ISO 4217	✓	✓	✓	✓	✓
20	Settlement location	Place of settlement of the transaction as stipulated in the contract, if applicable. This data element is only applicable for transactions that involve an offshore currency (i.e. a currency which is not included in the ISO 4217 currency list, for example CNH).	ISO 3166 Char(2) ISO country code	✓	✓	✓	✓	✓
21	Fixed rate day count convention - Leg 1	Where applicable: day count convention of leg 1 (often also referred to as day count fraction or day count basis or day count method) that determines how interest payments are calculated. It is used to compute the year fraction of the calculation period, and indicates the number of days in the calculation period divided by the number of days in the year.	ISO 20022: Interest Calculation/Day Count Basis Char(4) Allowable values: A001 = IC30360ISDAor30360AmericanBasicRule A002 = IC30365 A003 = IC30Actual A004 = Actual360 A005 = Actual365Fixed A006 = ActualActualICMA A007 = IC30E360orEuroBondBasismodel1 A008 = ActualActualISDA A009 = Actual365LorActuActubasisRule A010 = ActualActualAFB A011 = IC30360ICMAor30360basicrule A012 = IC30E2360orEurobondbasismodel2 A013 = IC30E3360orEurobondbasismodel3 A014 = Actual365NL A015 = ActualActualUltimo A016 = IC30EPlus360 A017 = Actual364 A018 = Business252 A019 = Actual360NL A020 = 1/1 NARR = Narrative	✓	×	✓	✓	✓
22	Floating rate day count convention - Leg 1	Where applicable: day count convention (often also referred to as day count fraction or day count basis or day count method) that determines how interest payments for the floating rate of leg 1 are calculated. It is used to compute the year fraction of the calculation period, and indicates the number of days in the calculation period divided by the number of days in the year.	ISO 20022: Interest Calculation/Day Count Basis Char(4) Allowable values: A001 = IC30360ISDAor30360AmericanBasicRule A002 = IC30365 A003 = IC30Actual A004 = Actual360 A005 = Actual365Fixed A006 = ActualActualICMA A007 = IC30E360orEuroBondBasismodel1 A008 = ActualActualISDA A009 = Actual365LorActuActubasisRule A010 = ActualActualAFB A011 = IC30360ICMAor30360basicrule A012 = IC30E2360orEurobondbasismodel2 A013 = IC30E3360orEurobondbasismodel3 A014 = Actual365NL A015 = ActualActualUltimo A016 = IC30EPlus360 A017 = Actual364 A018 = Business252 A019 = Actual360NL A020 = 1/1 NARR = Narrative	✓	×	✓	✓	✓

Appendix B to the Consultation Paper - List of Proposed Data Elements

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	Data element applicable to asset class				
				IR	FX	EQ	CD	CM
23	Fixed rate day count convention - Leg 2	Where applicable: day count convention of leg 2 (often also referred to as day count fraction or day count basis or day count method) that determines how interest payments are calculated. It is used to compute the year fraction of the calculation period, and indicates the number of days in the calculation period divided by the number of days in the year.	ISO 20022: Interest Calculation/Day Count Basis Char(4) Allowable values: A001 = IC30360ISDAor30360AmericanBasicRule A002 = IC30365 A003 = IC30Actual A004 = Actual360 A005 = Actual365Fixed A006 = ActualActualICMA A007 = IC30E360orEuroBondBasismodel1 A008 = ActualActualISDA A009 = Actual365LorActuActubasisRule A010 = ActualActualAFB A011 = IC30360ICMAor30360basicrule A012 = IC30E2360orEurobondbasismodel2 A013 = IC30E3360orEurobondbasismodel3 A014 = Actual365NL A015 = ActualActualUltimo A016 = IC30EPlus360 A017 = Actual364 A018 = Business252 A019 = Actual360NL A020 = 1/1 NARR = Narrative	✓	×	✓	✓	✓
24	Floating rate day count convention - Leg 2	Where applicable: day count convention (often also referred to as day count fraction or day count basis or day count method) that determines how interest payments for the floating rate of leg 2 are calculated. It is used to compute the year fraction of the calculation period, and indicates the number of days in the calculation period divided by the number of days in the year.	ISO 20022: Interest Calculation/Day Count Basis Char(4) Allowable values: A001 = IC30360ISDAor30360AmericanBasicRule A002 = IC30365 A003 = IC30Actual A004 = Actual360 A005 = Actual365Fixed A006 = ActualActualICMA A007 = IC30E360orEuroBondBasismodel1 A008 = ActualActualISDA A009 = Actual365LorActuActubasisRule A010 = ActualActualAFB A011 = IC30360ICMAor30360basicrule A012 = IC30E2360orEurobondbasismodel2 A013 = IC30E3360orEurobondbasismodel3 A014 = Actual365NL A015 = ActualActualUltimo A016 = IC30EPlus360 A017 = Actual364 A018 = Business252 A019 = Actual360NL A020 = 1/1 NARR = Narrative	✓	×	✓	✓	✓
25	Fixed rate payment frequency period - Leg 1	Where applicable: time unit associated with the frequency of payments, eg day, week, month, year or term of the stream for the fixed rate of leg 1.	ISO 20022: InterestCalculation/PaymentFrequency Char(4) Allowable values: DAIL = daily WEEK = weekly MNTH = monthly YEAR = yearly ADHO = ad hoc which applies when payments are irregular EXPI = payment at term	✓	×	✓	✓	✓
26	Floating rate payment frequency period - Leg 1	Where applicable: time unit associated with the frequency of payments, eg day, week, month, year or term of the stream for the floating rate of leg 1.	ISO 20022: InterestCalculation/PaymentFrequency Char(4) Allowable values: DAIL = daily WEEK = weekly MNTH = monthly YEAR = yearly ADHO = ad hoc which applies when payments are irregular EXPI = payment at term	✓	×	✓	✓	✓
27	Fixed rate payment frequency period - Leg 1	Where applicable: time unit associated with the frequency of payments, eg day, week, month, year or term of the stream for the fixed rate of leg 2.	ISO 20022: InterestCalculation/PaymentFrequency Char(4) Allowable values: DAIL = daily WEEK = weekly MNTH = monthly YEAR = yearly ADHO = ad hoc which applies when payments are irregular EXPI = payment at term	✓	×	✓	✓	✓
28	Floating rate payment frequency period - Leg 2	Where applicable: time unit associated with the frequency of payments, eg day, week, month, year or term of the stream for the floating rate of leg 2.	ISO 20022: InterestCalculation/PaymentFrequency Char(4) Allowable values: DAIL = daily WEEK = weekly MNTH = monthly YEAR = yearly ADHO = ad hoc which applies when payments are irregular EXPI = payment at term	✓	×	✓	✓	✓

Appendix B to the Consultation Paper - List of Proposed Data Elements

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	Data element applicable to asset class				
				IR	FX	EQ	CD	CM
29	Fixed rate payment frequency period multiplier - Leg 1	Where applicable: number of time units (as expressed by the payment frequency period) that determines the frequency at which periodic payment dates occur for the fixed rate of leg 1. For example, a transaction with payments occurring every two months is represented with a payment frequency period of “MNTH” (monthly) and a payment frequency period multiplier of 2. This data element is not applicable if the payment frequency period is “ADHO”. If payment frequency period is "EXPI", then the payment frequency period multiplier is 1. If the payment frequency is intraday, then the payment frequency period is “DAIL” and the payment frequency multiplier is 0.	Num(3,0) Any value greater than or equal to zero.	✓	×	✓	✓	✓
30	Floating rate payment frequency period multiplier - Leg 1	Where applicable: number of time units (as expressed by the payment frequency period) that determines the frequency at which periodic payment dates occur for the floating rate of leg 1. For example, a transaction with payments occurring every two months is represented with a payment frequency period of “MNTH” (monthly) and a payment frequency period multiplier of 2. This data element is not applicable if the payment frequency period is “ADHO”. If payment frequency period is "EXPI", then the payment frequency period multiplier is 1. If the payment frequency is intraday, then the payment frequency period is “DAIL” and the payment frequency multiplier is 0.	Num(3,0) Any value greater than or equal to zero.	✓	×	✓	✓	✓
31	Fixed rate payment frequency period multiplier - Leg 2	Where applicable: number of time units (as expressed by the payment frequency period) that determines the frequency at which periodic payment dates occur for the fixed rate of leg 2. For example, a transaction with payments occurring every two months is represented with a payment frequency period of “MNTH” (monthly) and a payment frequency period multiplier of 2. This data element is not applicable if the payment frequency period is “ADHO”. If payment frequency period is "EXPI", then the payment frequency period multiplier is 1. If the payment frequency is intraday, then the payment frequency period is “DAIL” and the payment frequency multiplier is 0.	Num(3,0) Any value greater than or equal to zero.	✓	×	✓	✓	✓
32	Floating rate payment frequency period multiplier - Leg 2	Where applicable: number of time units (as expressed by the payment frequency period) that determines the frequency at which periodic payment dates occur for the floating rate of leg 2. For example, a transaction with payments occurring every two months is represented with a payment frequency period of “MNTH” (monthly) and a payment frequency period multiplier of 2. This data element is not applicable if the payment frequency period is “ADHO”. If payment frequency period is "EXPI", then the payment frequency period multiplier is 1. If the payment frequency is intraday, then the payment frequency period is “DAIL” and the payment frequency multiplier is 0.	Num(3,0) Any value greater than or equal to zero.	✓	×	✓	✓	✓
33	Valuation amount	Current value of the outstanding contract. without applying any valuation adjustments (i.e. any XVA adjustment such as CVA, DVA, etc). Valuation amount is expressed as the exit cost of the contract or components of the contract, i.e. the price that would be received to sell the contract (in the market in an orderly transaction at the valuation date).	Num(25,5) Any value.	✓	✓	✓	✓	✓
34	Valuation currency	Currency in which the valuation amount is denominated.	ISO 4217 Char(3) Allowable values: Currencies included in ISO 4217	✓	✓	✓	✓	✓
35	Valuation timestamp	Date and time of the last valuation marked to market, provided by the central counterparty or calculated using the current or last available market price of the inputs. If for example a currency exchange rate is the basis for a transaction’s valuation, then the valuation timestamp reflects the moment in time that exchange rate was current.	ISO 8601 YYYY-MM-DDThh:mm:ssZ, based on UTC.	✓	✓	✓	✓	✓
36	Valuation method	Source and method used for the valuation of the transaction by the reporting counterparty. If at least one valuation input is used that is classified as mark-to-model in the below table, then the whole valuation is classified as mark-to-model. If only inputs are used that are classified as mark-to-market in the table below, then the whole valuation is classified as mark-to-market.	Char(4) Allowable values: MTMA = mark-to-market MTMO = mark-to-model CCPV = central counterparty’s valuation	✓	✓	✓	✓	✓
37	Collateral portfolio indicator	Indicator of whether the collateralisation was performed on a portfolio basis, if applicable. By “on a portfolio basis”, it is meant a set of transactions that are margined together (either on a net or a gross basis) contrary to the scenario where the margin is calculated and posted for each individual transaction separately.	Boolean Allowable values: true, if collateralised on a portfolio basis false, if not part of a portfolio	✓	✓	✓	✓	✓
38	Collateral portfolio code	If collateral is reported on a portfolio basis, unique code assigned by the reporting counterparty to the portfolio, if applicable. This data element is not applicable if the collateralisation was performed on a transaction level basis, or if there is no collateral agreement or if no collateral is posted or received.	ISO 20022 Portfolio/Identification Varchar(52) Up to 52 alphanumerical characters.	✓	✓	✓	✓	✓
39	Initial margin posted by the counterparty 1 (pre-haircut)	Monetary value of initial margin that has been posted by the reporting counterparty, including any margin that is in transit and pending settlement unless inclusion of such margin is not allowed under the jurisdictional requirements, if applicable. If the collateralisation is performed at portfolio level, the initial margin posted relates to the whole portfolio; if the collateralisation is performed for single transactions, the initial margin posted relates to such single transaction. This refers to the total current value of the initial margin, rather than to its daily change. The data element refers both to uncleared and centrally cleared transactions. For centrally cleared transactions, the data element does not include default fund contributions, nor collateral posted against liquidity provisions to the central counterparty, i.e. committed credit lines. If the initial margin posted is denominated in more than one currency, those amounts are converted into a single currency chosen by the reporting counterparty and reported as one total value.	ISO 20022: MarginCall/InitialMargin Num(25,5) Any value greater than or equal to zero.	✓	✓	✓	✓	✓

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Row no.	Data Element Name	Definition of Data Element	Format and allowable values	Data element applicable to asset class				
				IR	FX	EQ	CD	CM
40	Initial margin posted by the counterparty 1 (post-haircut)	Monetary value of initial margin that has been posted by the reporting counterparty, including any margin that is in transit and pending settlement unless inclusion of such margin is not allowed under the jurisdictional requirements, if applicable. If the collateralisation is performed at portfolio level, the initial margin posted relates to the whole portfolio; if the collateralisation is performed for single transactions, the initial margin posted relates to such single transaction. This refers to the total current value of the initial margin after application of the haircut (if applicable), rather than to its daily change. The data element refers both to uncleared and centrally cleared transactions. For centrally cleared transactions, the data element does not include default fund contributions, nor collateral posted against liquidity provisions to the central counterparty, i.e. committed credit lines. If the initial margin posted is denominated in more than one currency, those amounts are converted into a single currency chosen by the reporting counterparty and reported as one total value.	ISO 20022: MarginCall/InitialMargin Num(25,5) Any value greater than or equal to zero.	✓	✓	✓	✓	✓
41	Currency of initial margin posted	Currency in which the initial margin posted is denominated, if applicable. If the initial margin posted is denominated in more than one currency, this data element reflects one of those currencies into which the reporting counterparty has chosen to convert all the values of posted initial margins.	ISO 4217 Char(3) Allowable values: Currencies included in ISO 4217	✓	✓	✓	✓	✓
42	Initial margin collected by the counterparty 1 (pre-haircut)	Monetary value of initial margin that has been collected by the reporting counterparty, including any margin that is in transit and pending settlement unless inclusion of such margin is not allowed under the jurisdictional requirements, if applicable. If the collateralisation is performed at portfolio level, the initial margin collected relates to the whole portfolio; if the collateralisation is performed for single transactions, the initial margin collected relates to such single transaction. This refers to the total current value of the initial margin, rather than to its daily change. The data element refers both to uncleared and centrally cleared transactions. For centrally cleared transactions, the data element does not include collateral collected by the central counterparty as part of its investment activity. If the initial margin collected is denominated in more than one currency, those amounts are converted into a single currency chosen by the reporting counterparty and reported as one total value.	ISO 20022: MarginCall/InitialMargin Num(25,5) Any value greater than or equal to zero.	✓	✓	✓	✓	✓
43	Initial margin collected by the counterparty 1 (post-haircut)	Monetary value of initial margin that has been collected by the reporting counterparty, including any margin that is in transit and pending settlement unless inclusion of such margin is not allowed under the jurisdictional requirements. If the collateralisation is performed at portfolio level, the initial margin collected relates to the whole portfolio; if the collateralisation is performed for single transactions, the initial margin collected relates to such single transaction. This refers to the total current value of the initial margin after application of the haircut (if applicable), rather than to its daily change. The data element refers both to uncleared and centrally cleared transactions. For centrally cleared transactions, the data element does not include collateral collected by the central counterparty as part of its investment activity. If the initial margin collected is denominated in more than one currency, those amounts are converted into a single currency chosen by the reporting counterparty and reported as one total value.	ISO 20022: MarginCall/InitialMargin Num(25,5) Any value greater than or equal to zero.	✓	✓	✓	✓	✓
44	Currency of initial margin collected	Currency in which the initial margin collected is denominated, if applicable. If the initial margin collected is denominated in more than one currency, this data element reflects one of those currencies into which the reporting counterparty has chosen to convert all the values of collected initial margins.	ISO 4217 Char(3) Allowable values: Currencies included in ISO 4217	✓	✓	✓	✓	✓
45	Variation margin posted by the counterparty 1 (pre-haircut)	Monetary value of the variation margin posted by the reporting counterparty (including the cash-settled one), and including any margin that is in transit and pending settlement unless inclusion of such margin is not allowed under the jurisdictional requirements, if applicable. Contingent variation margin is not included. If the collateralisation is performed at portfolio level, the variation margin posted relates to the whole portfolio; if the collateralisation is performed for single transactions, the variation margin posted relates to such single transaction. This data element refers to the total current value of the variation margin, cumulated since the first reporting of variation margins posted for the portfolio/transaction. If the variation margin posted is denominated in more than one currency, those amounts are converted into a single currency chosen by the reporting counterparty and reported as one total value.	ISO 20022: MarginCall/VariationMargin Num(25,5) Any value greater than or equal to zero.	✓	✓	✓	✓	✓
46	Variation margin posted by the counterparty 1 (post-haircut)	Monetary value of the variation margin posted by the reporting counterparty (including the cash-settled one), and including any margin that is in transit and pending settlement unless inclusion of such margin is not allowed under the jurisdictional requirements, if applicable. Contingent variation margin is not included. If the collateralisation is performed at portfolio level, the variation margin posted relates to the whole portfolio; if the collateralisation is performed for single transactions, the variation margin posted relates to such single transaction. This data element refers to the total current value of the variation margin after application of the haircut (if applicable), cumulated since the first reporting of posted variation margins for the portfolio/transaction. If the variation margin posted is denominated in more than one currency, those amounts are converted into a single currency chosen by the reporting counterparty and reported as one total value.	ISO 20022: MarginCall/VariationMargin Num(25,5) Any value greater than or equal to zero.	✓	✓	✓	✓	✓

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Row no.	Data Element Name	Definition of Data Element	Format and allowable values	Data element applicable to asset class				
				IR	FX	EQ	CD	CM
47	Currency of variation margin posted	Currency in which the variation margin posted is denominated, if applicable. If the variation margin posted is denominated in more than one currency, this data element reflects one of those currencies into which the reporting counterparty has chosen to convert all the values of posted variation margins.	ISO 4217 Char(3) Allowable values: Currencies included in ISO 4217	✓	✓	✓	✓	✓
48	Variation margin collected by the counterparty 1 (pre-haircut)	Monetary value of the variation margin collected by the reporting counterparty (including the cash- settled one), and including any margin that is in transit and pending settlement unless inclusion of such margin is not allowed under the jurisdictional requirements, if applicable. Contingent variation margin is not included. If the collateralisation is performed at portfolio level, the variation margin collected relates to the whole portfolio; if the collateralisation is performed for single transactions, the variation margin collected relates to such single transaction. This refers to the total current value of the variation margin, cumulated since the first reporting of collected variation margins for the portfolio/transaction. If the variation margin collected is denominated in more than one currency, those amounts are converted into a single currency chosen by the reporting counterparty and reported as one total value.	ISO 20022: MarginCall/VariationMargin Num(25,5) Any value greater than or equal to zero.	✓	✓	✓	✓	✓
49	Variation margin collected by the counterparty 1 (post-haircut)	Monetary value of the variation margin collected by the reporting counterparty (including the cash- settled one), and including any margin that is in transit and pending settlement unless inclusion of such margin is not allowed under the jurisdictional requirements, if applicable. Contingent variation margin is not included. If the collateralisation is performed at portfolio level, the variation margin collected relates to the whole portfolio; if the collateralisation is performed for single transactions, the variation margin collected relates to such single transaction. This refers to the total current value of the variation margin collected after application of the haircut (if applicable), cumulated since the first reporting of collected variation margins for the portfolio/transaction. If the variation margin collected is denominated in more than one currency, those amounts are converted into a single currency chosen by the reporting counterparty and reported as one total value.	ISO 20022: MarginCall/VariationMargin Num(25,5) Any value greater than or equal to zero.	✓	✓	✓	✓	✓
50	Currency of variation margin collected	Currency in which the variation margin collected is denominated, if applicable. If the variation margin collected is denominated in more than one currency, this data element reflects one of those currencies into which the reporting counterparty has chosen to convert all the values of collected variation margins.	ISO 4217 Char(3) Allowable values: Currencies included in ISO 4217	✓	✓	✓	✓	✓
51	Excess collateral posted by the counterparty 1	Monetary value of any additional collateral posted by the reporting counterparty separate and independent from initial and variation margin. This refers to the total current value of the excess collateral before application of the haircut (if applicable), rather than to its daily change. Any initial or variation margin amount posted that exceeds the required initial margin or required variation margin, is reported as part of the initial margin posted or variation margin posted respectively rather than included as excess collateral posted. For centrally cleared transactions, excess collateral is reported only to the extent it can be assigned to a specific portfolio or transaction.	Num(25,5) Any value greater than or equal to zero.	✓	✓	✓	✓	✓
52	Currency of excess collateral posted	Currency in which the excess collateral posted is denominated, if applicable. If the excess collateral posted is denominated in more than one currency, this data element reflects one of those currencies into which the reporting counterparty has chosen to convert all the values of posted excess collateral.	ISO 4217 Char(3) Allowable values: Currencies included in ISO 4217	✓	✓	✓	✓	✓
53	Excess collateral collected by the counterparty 1	Monetary value of any additional collateral collected by the reporting counterparty separate and independent from initial and variation margin. This data element refers to the total current value of the excess collateral before application of the haircut (if applicable), rather than to its daily change. Any initial or variation margin amount collected that exceeds the required initial margin or required variation margin, is reported as part of the initial margin collected or variation margin collected respectively, rather than included as excess collateral collected. For centrally cleared transactions excess collateral is reported only to the extent it can be assigned to a specific portfolio or transaction.	Num(25,5) Any value greater than or equal to zero.	✓	✓	✓	✓	✓
54	Currency of excess collateral collected	Currency in which the excess collateral collected is denominated, if applicable. If the excess collateral is denominated in more than one currency, this data element reflects one of those currencies into which the reporting counterparty has chosen to convert all the values of collected excess collateral.	ISO 4217 Char(3) Allowable values: Currencies included in ISO 4217	✓	✓	✓	✓	✓

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Row no.	Data Element Name	Definition of Data Element	Format and allowable values	Data element applicable to asset class				
				IR	FX	EQ	CD	CM
55	Collateralisation category	Indicator of whether a collateral agreement (or collateral agreements) between the counterparties exists (uncollateralised/partially collateralised/one-way collateralised/fully collateralised), if applicable. This data element is provided for each transaction or each portfolio, depending on whether the collateralisation is performed at the transaction or portfolio level, and is applicable to both cleared and uncleared transactions.	Char(4) Allowable values: UNCL = Uncollateralised *There is no collateral agreement between the counterparties or the collateral agreement(s) between the counterparties stipulates that no collateral (neither initial margin nor variation margin) has to be posted with respect to the derivative transaction.* PRC1 = Partially collateralised: Counterparty 1 only *The collateral agreement(s) between the counterparties stipulates that the reporting counterparty regularly posts only variation margin and that the other counterparty does not post any margin with respect to the derivative transaction.* PRC2 = Partially collateralised: Counterparty 2 only *The collateral agreement(s) between the counterparties stipulates that the other counterparty regularly posts only variation margin and that the reporting counterparty does not post any margin with respect to the derivative transaction.* PRCL = Partially collateralised *The collateral agreement(s) between the counterparties stipulates that both counterparties regularly post only variation margin with respect to the derivative transaction.* OWC1 = One-way collateralised: Counterparty 1 only *The collateral agreement(s) between the counterparties stipulates that the reporting counterparty posts the initial margin and regularly posts variation margin and that the other counterparty does not post any margin with respect to the derivative transaction.* OWC2 = One-way collateralised: Counterparty 2 only *The collateral agreement(s) between the counterparties stipulates that the other counterparty posts the initial margin and regularly posts variation margin and that the reporting counterparty does not post any margin with respect to the derivative transaction.* OWP1 = One-way/partially collateralised: Counterparty 1 *The collateral agreement(s) between the counterparties stipulates that the reporting counterparty posts the initial margin and regularly posts variation margin and that the other counterparty regularly posts only variation margin.* OWP2 = One- way/partially collateralised: Counterparty 2 *The collateral agreement(s) between the counterparties stipulates that the other counterparty posts the initial margin and regularly posts variation margin and that the reporting counterparty regularly posts only variation margin.* FLCL = Fully collateralised *The collateral agreement(s) between the counterparties stipulates that both counterparties post initial margin and regularly post variation margin with respect to the derivative transaction.*	✓	✓	✓	✓	✓
56	Price	Price specified in the OTC derivative transaction, if applicable. It does not include fees, taxes or commissions, if applicable. For commodity fixed/float swaps and similar products with periodic payments, this data element refers to the fixed price of the fixed Leg(s). For commodity and equity forwards and similar products, this data element refers to the forward price of the underlying or reference asset. For equity swaps, portfolios swaps, and similar products, this data element refers to the initial price of the underlying or reference asset. For contracts for difference and similar products, this data element refers to the initial price of the underlier. This data element is not applicable to: • Interest rate swaps and forward rate agreements, as it is understood that the information included in the data elements Fixed rate and Spread may be interpreted as the price of the transaction. • Interest rate options and interest rate swaptions, as it is understood that the information included in the data elements Strike price and Option premium may be interpreted as the price of the transaction. • Commodity basis swaps, as it is understood that the information included in the data element Spread may be interpreted as the price of the transaction. • Foreign exchange swaps, forwards and options, as it is understood that the information included in the data elements Exchange rate, Strike price, and Option premium may be interpreted as the price of the transaction. • Equity options, as it is understood that the information included in the data elements Strike price and Option premium may be interpreted as the price of the transaction. • Credit default swaps and credit total return swaps, as it is understood that the information included in the data elements Fixed rate, Spread and Upfront payment (Other payment type: Upfront payment) may be interpreted as the price of the transaction. • Commodity options, as it is understood that the information included in the data elements Strike price and Option premium may be interpreted as the price of the transaction. Where the price is not known when a new transaction is reported, the price is updated as it becomes available. For transactions that are part of a package, this data element contains the price of the component transaction where applicable.	ISO 20022: Price/Amount Num(18,13), if Price notation = 1 Num(11,10), if Price notation = 3 Any value, if Price notation = 1 Any value expressed as decimal (eg 0.0257 instead of 2.57%), if Price notation = 3	×	×	✓	×	✓
57	Price currency	Currency in which the price is denominated, if applicable. Price currency is only applicable if Price notation = 1.	ISO 4217 Char(3) Allowable values: Currencies included in ISO 4217	×	×	✓	×	✓
58	Price notation	Manner in which the price is expressed, if applicable.	Char(1) Allowable values: 1 = monetary amount 3 = decimal	×	×	✓	×	✓
59	Price unit of measure	Unit of measure in which the price is expressed, if applicable.	ISO 20022: Price/UnitOfMeasure Char(4) Allowable values: ISO 20022: approved external UnitOfMeasureCode codeset	×	×	✓	×	✓
60	Price schedule - Unadjusted effective date of the price	Where applicable: for OTC derivative transactions with prices varying throughout the life of the transaction: Unadjusted effective date of the price. Price schedule is only applicable if the price varies per schedule.	ISO 8601 YYYY-MM-DD, based on UTC, repeatable for each date.	×	×	✓	×	✓
61	Price schedule - Unadjusted end date of the price	Where applicable: for OTC derivative transactions with prices varying throughout the life of the transaction: Unadjusted end date of the price. (not applicable if the unadjusted end date of a given schedule's period is back-to-back with the unadjusted effective date of the subsequent period). Price schedule is only applicable if the price varies per schedule.	ISO 8601 YYYY-MM-DD, based on UTC, repeatable for each date.	×	×	✓	×	✓

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Row no.	Data Element Name	Definition of Data Element	Format and allowable values	Data element applicable to asset class				
				IR	FX	EQ	CD	CM
62	Price schedule - Price in effect between the unadjusted effective date and unadjusted end date inclusive	Where applicable: for OTC derivative transactions with prices varying throughout the life of the transaction: Price in effect between the unadjusted effective date and unadjusted end date inclusive. Price schedule is only applicable if the price varies per schedule.	2.54.3: ISO 20022: Price/Amount Num(18,13), if Price notation = 1 Num(11,10), if Price notation = 3 Any value greater than zero, if Price notation = 1 Any value expressed as decimal (eg 0.0257 instead of 2.57%), if Price notation = 3 Repeatable for each price.	×	×	✓	×	✓
63	Fixed rate - Leg 1	Where applicable: for OTC derivative transactions with periodic payments, per annum rate of the fixed rate of leg 1.	ISO 20022: Interest/Rate Num(11,10), if Fixed rate notation = 2 Positive and negative values expressed as decimal (eg 0.0257 instead of 2.57%), if Fixed rate notation = 2	✓	×	✓	✓	✓
64	Fixed rate - Leg 2	Where applicable: for OTC derivative transactions with periodic payments, per annum rate of the fixed rate of leg 2.	ISO 20022: Interest/Rate Num(11,10), if Fixed rate notation = 2 Positive and negative values expressed as decimal (eg 0.0257 instead of 2.57%), if Fixed rate notation = 2	✓	×	✓	✓	✓
65	Fixed rate notation - Leg 1	Where applicable: manner in which the fixed rate is expressed for leg 1	Char(1) Allowable values: 2 = decimal	✓	×	✓	✓	✓
66	Fixed rate notation - Leg 2	Where applicable: manner in which the fixed rate is expressed for leg 2	Char(1) Allowable values: 2 = decimal	✓	×	✓	✓	✓
67	Spread - Leg 1	An indication of the spread of leg 1, Where applicable: for OTC derivative transactions with periodic payments (eg interest rate fixed/float swaps, interest rate basis swaps, commodity swaps), • spread on the individual floating leg(s) index reference price, in the case where there is a spread on a floating leg(s). • difference between the reference prices of the two floating leg indexes.	ISO 20022: Spread/SpreadRate or ISO 20022: Spread/PriceOffset or ISO 20022: Spread/BasisPointSpread Num(18,13), if Spread notation = 1 Num(11,10), if Spread notation = 3 Num(5), if Spread notation = 4 Any value, if Spread notation = 1 Any value expressed as decimal (eg 0.0257 instead of 2.57%), if Spread notation = 3 Any integer value expressed in basis points (eg 257 instead of 2.57%), if Spread notation = 4	✓	×	✓	✓	✓
68	Spread - Leg 2	An indication of the spread of leg 2, Where applicable: for OTC derivative transactions with periodic payments (e.g. interest rate fixed/float swaps, interest rate basis swaps, commodity swaps), • spread on the individual floating leg(s) index reference price, in the case where there is a spread on a floating leg(s). • difference between the reference prices of the two floating leg indexes.	ISO 20022: Spread/SpreadRate or ISO 20022: Spread/PriceOffset or ISO 20022: Spread/BasisPointSpread Num(18,13), if Spread notation = 1 Num(11,10), if Spread notation = 3 Num(5), if Spread notation = 4 Any value, if Spread notation = 1 Any value expressed as decimal (eg 0.0257 instead of 2.57%), if Spread notation = 3 Any integer value expressed in basis points (eg 257 instead of 2.57%), if Spread notation = 4	✓	×	✓	✓	✓
69	Spread currency - Leg 1	Where applicable: currency in which the spread of leg 1 is denominated. This data element is only applicable if Spread notation = 1.	ISO 4217 Char(3) Allowable values: Currencies included in ISO 4217	✓	×	✓	✓	✓
70	Spread currency - Leg 2	Where applicable: currency in which the spread of leg 2 is denominated. This data element is only applicable if Spread notation = 1.	ISO 4217 Char(3) Allowable values: Currencies included in ISO 4217	✓	×	✓	✓	✓
71	Spread notation - Leg 1	Where applicable: manner in which the spread is expressed for leg 1.	Char(1) Allowable values: 1 = monetary amount 3 = decimal 4 = basis points	✓	×	✓	✓	✓
72	Spread notation - Leg 2	Where applicable: manner in which the spread is expressed for leg 2.	Char(1) Allowable values: 1 = monetary amount 3 = decimal 4 = basis points	✓	×	✓	✓	✓
73	Strike price	Where applicable: • For options other than FX options, swaptions and similar products, price at which the owner of an option can buy or sell the underlying asset of the option. • For foreign exchange options, exchange rate at which the option can be exercised, expressed as the rate of exchange from converting the unit currency into the quoted currency. In the example 0.9426 USD/EUR, USD is the unit currency and EUR is the quoted currency; USD 1 = EUR 0.9426.Where the strike price is not known when a new transaction is reported, the strike price is updated as it becomes available. • For volatility and variance swaps and similar products the volatility strike price is reported in this data element.	ISO 20022: Option/Strike Price Num(18,13), if Strike price notation = 1 Num(11,10), if Strike price notation = 3 Any value (eg USD 6.39) expressed as 6.39, for equity options, commodity options, foreign exchange options and similar products, if Strike price notation = 1. Any value expressed as decimals (eg 0.021 instead of 2.1%), for interest rate options, interest rate and credit swaptions quoted in spread, and similar products, if Strike price notation = 3.	✓	✓	✓	✓	✓

Appendix B to the Consultation Paper - List of Proposed Data Elements

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	Data element applicable to asset class				
				IR	FX	EQ	CD	CM
74	Strike price currency/currency pair	Where applicable: For equity options, commodity options, and similar products, currency in which the strike price is denominated. For foreign exchange options: Currency pair and order in which the strike price is expressed. It is expressed as unit currency/quoted currency. Strike price currency/currency pair is only applicable if Strike price notation = 1.	ISO 4217 Char(3) For foreign exchange options: Char(3)/Char(3); [Unit currency/Quoted currency] without restricting the currency pair ordering Allowable values: Currencies included in ISO 4217	✓	✓	✓	✓	✓
75	Strike price notation	Manner in which the Strike price is expressed, if applicable.	Char(1) Allowable values: 1 = monetary amount 3 = decimal	✓	✓	✓	✓	✓
76	Strike price schedule - Unadjusted effective date of the strike price	Where applicable: for options, swaptions and similar products with strike prices varying throughout the life of the transaction: Unadjusted effective date of the strike price. Strike price schedule is only applicable if the strike price varies per schedule.	ISO 8601 YYYY-MM-DD, based on UTC, repeatable for each date.	✓	✓	✓	✓	✓
77	Strike price schedule - Unadjusted end date of the strike price	Where applicable: for options, swaptions and similar products with strike prices varying throughout the life of the transaction: Unadjusted end date of the strike price. (not applicable if the unadjusted end date of a given schedule's period is back-to-back with the unadjusted effective date of the subsequent period). Strike price schedule is only applicable if the strike price varies per schedule.	ISO 8601 YYYY-MM-DD, based on UTC, repeatable for each date.	✓	✓	✓	✓	✓
78	Strike price schedule - Strike price in effect between the unadjusted effective date and unadjusted end date inclusive	Where applicable: for options, swaptions and similar products with strike prices varying throughout the life of the transaction: Strike price in effect between the unadjusted effective date and unadjusted end date inclusive. Strike price schedule is only applicable if the strike price varies per schedule.	ISO 20022 Option/Strike Price Num(18,13), if Strike price notation = 1 Num(11,10), if Strike price notation = 3 Any value greater than zero: - Any value (eg USD 6.39) expressed as 6.39, for equity options, commodity options, foreign exchange options and similar products if Strike price notation = 1. - Any value expressed as decimal (eg 0.021 instead of 2.1%), for interest rate options, interest rate and credit swaptions quoted in spread, and similar products, if Strike price notation = 3. Repeatable for each strike price.	✓	✓	✓	✓	✓
79	Option premium amount	For options and swaptions of all asset classes, monetary amount paid by the option buyer. This data element is not applicable if the instrument is not an option or does not embed any optionality, if applicable.	Num(25,5) Any value greater than or equal to zero.	✓	✓	✓	✓	✓
80	Option premium currency	For options and swaptions of all asset classes, currency in which the option premium amount is denominated. This data element is not applicable if the instrument is not an option or does not embed any optionality, if applicable.	ISO 4217 Char(3) Allowable values: Currencies included in ISO 4217	✓	✓	✓	✓	✓
81	Option premium payment date	Unadjusted date on which the option premium is paid, if applicable.	ISO 8601 YYYY-MM-DD, based on UTC.	✓	✓	✓	✓	✓
82	First exercise date	First unadjusted date during the exercise period in which an option can be exercised, if applicable. For European-style options, this date is same as the Expiration date. For American-style options, the first possible exercise date is the unadjusted date included in the execution timestamp. For knock-in options, where the first exercise date is not known when a new transaction is reported, the first exercise date is updated as it becomes available. This data element is not applicable if the instrument is not an option or does not embed any optionality.	ISO 8601 YYYY-MM-DD, based on UTC.	✓	✓	✓	✓	✓
83	Exchange rate	Exchange rate between the two different currencies specified in the OTC derivative transaction agreed by the counterparties at the inception of the transaction, expressed as the rate of exchange from converting the unit currency into the quoted currency, if applicable.	ISO 20022 CurrencyExchange/ExchangeRate Num(18,13) Any value greater than zero.	×	✓	×	×	×
84	Exchange rate basis	Currency pair and order in which the exchange rate is denominated, expressed as unit currency/quoted currency, if applicable. In the example 0.9426 USD/EUR, USD is the unit currency and EUR is the quoted currency, USD 1 = EUR 0.9426.	Char(3)/Char(3); [Unit currency/Quoted currency], without restricting the currency pair ordering (i.e. the exchange rate basis may be USD/EUR or EUR/USD). Any pair of currencies included in ISO 4217.	×	✓	×	×	×
85	Notional amount - Leg 1	Where applicable: Notional amount of leg 1. - for OTC derivative transactions negotiated in monetary amounts, amount specified in the contract. - for OTC derivative transactions negotiated in non-monetary amounts: (1) Equity options and similar products: Product of the strike price and the number of shares or index units (2) Equity forwards and similar products: Product of the forward price and the number of shares or index units (3) Equity dividend swaps and similar products: Product of the period fixed strike and the number of shares or index units. (4) Equity swaps, portfolio swaps and similar products: Product of the initial price and the number of shares or index units. (5) Equity variance swaps and similar products: Variance amount. (6) Equity volatility swaps and similar products: Vega notional amount (7) Equity CFDs and similar products: Product of the initial price and the number of shares or index units (8) Commodity options and similar products: Product of the strike price and the total notional quantity (9) Commodity forwards and similar products: Product of the forward price and the total notional quantity (10) Commodity fixed/float swaps and similar products: Product of the fixed price and the total notional quantity (11) Commodity basis swaps and similar products: Product of the last available spot price at the time of the transaction of the underlying asset of the leg with no spread and the total notional quantity of the leg with no spread (12) Commodity swaptions and similar products: Notional amount of the underlying contract (13) Commodity CFDs and similar products: Product of the initial price and the total notional quantity	ISO 20022: Derivative/NotionalCurrencyAndAmount Num(25,5) Any value (Negative values are only allowed for commodity derivatives when applies).	✓	✓	✓	✓	✓

Appendix B to the Consultation Paper - List of Proposed Data Elements

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	Data element applicable to asset class				
				IR	FX	EQ	CD	CM
		Notes to the conversion table for OTC derivative transactions negotiated in non-monetary amounts: Note 1: for transactions where the quantity unit of measure differs from the price unit of measure, the price or total quantity is converted to a unified unit of measure. Note 2: if applicable to the transaction, the notional amount reflects any multipliers and option entitlements. Note 3: for basket-type contracts, the notional amount of the transaction is the sum of the notional amounts of each constituent of the basket. In addition: For OTC derivative transactions with a notional amount schedule, the initial notional amount, agreed by the counterparties at the inception of the transaction, is reported in this data element. For OTC foreign exchange options, in addition to this data element, the amounts are reported using the data elements Call amount and Put amount. For amendments or lifecycle events, the resulting outstanding notional amount is reported; (steps in notional amount schedules are not considered to be amendments or lifecycle events); Where the notional amount is not known when a new transaction is reported, the notional amount is updated as it becomes available.						
86	Notional amount - Leg 2	Where applicable: Notional amount of leg 2. - for OTC derivative transactions negotiated in monetary amounts, amount specified in the contract. - for OTC derivative transactions negotiated in non-monetary amounts: (1) Equity options and similar products: Product of the strike price and the number of shares or index units (2) Equity forwards and similar products: Product of the forward price and the number of shares or index units (3) Equity dividend swaps and similar products: Product of the period fixed strike and the number of shares or index units. (4) Equity swaps, portfolio swaps and similar products: Product of the initial price and the number of shares or index units. (5) Equity variance swaps and similar products: Variance amount. (6) Equity volatility swaps and similar products: Vega notional amount (7) Equity CFDs and similar products: Product of the initial price and the number of shares or index units (8) Commodity options and similar products: Product of the strike price and the total notional quantity (9) Commodity forwards and similar products: Product of the forward price and the total notional quantity (10) Commodity fixed/float swaps and similar products: Product of the fixed price and the total notional quantity (11) Commodity basis swaps and similar products: Product of the last available spot price at the time of the transaction of the underlying asset of the leg with no spread and the total notional quantity of the leg with no spread (12) Commodity swaptions and similar products: Notional amount of the underlying contract (13) Commodity CFDs and similar products: Product of the initial price and the total notional quantity Notes to the conversion table for OTC derivative transactions negotiated in non-monetary amounts: Note 1: for transactions where the quantity unit of measure differs from the price unit of measure, the price or total quantity is converted to a unified unit of measure. Note 2: if applicable to the transaction, the notional amount reflects any multipliers and option entitlements. Note 3: for basket-type contracts, the notional amount of the transaction is the sum of the notional amounts of each constituent of the basket. In addition: For OTC derivative transactions with a notional amount schedule, the initial notional amount, agreed by the counterparties at the inception of the transaction, is reported in this data element. For OTC foreign exchange options, in addition to this data element, the amounts are reported using the data elements Call amount and Put amount. For amendments or lifecycle events, the resulting outstanding notional amount is reported; (steps in notional amount schedules are not considered to be amendments or lifecycle events); Where the notional amount is not known when a new transaction is reported, the notional amount is updated as it becomes available.	ISO 20022: Derivative/NotionalCurrencyAndAmount Num(25,5) Any value (Negative values are only allowed for commodity derivatives when applies).	✓	✓	✓	✓	✓
87	Delta	The ratio of the change in the price of an OTC derivative transaction to the change in the price of the underlier if applicable.	Num(25,5) Any value	✓	✓	✓	✓	✓
88	Call amount	For foreign exchange options, the monetary amount that the option gives the right to buy, if applicable.	ISO 20022: CurrencyOption/CallAmount Num(25,5) Any value greater than zero.	×	✓	×	×	×
89	Put amount	For foreign exchange options, the monetary amount that the option gives the right to sell, if applicable.	ISO 20022: CurrencyOption/PutAmount Num(25,5) Any value greater than zero.	×	✓	×	×	×
90	Notional currency - Leg 1	Where applicable: the currency in which the notional amount of leg 1 is denominated.	ISO 4217 Char(3) Allowable values: Currencies included in ISO 4217	✓	✓	✓	✓	✓
91	Notional currency - Leg 2	Where applicable: the currency in which the notional amount of leg 2 is denominated.	ISO 4217 Char(3) Allowable values: Currencies included in ISO 4217	✓	✓	✓	✓	✓
92	Call currency	For foreign exchange options, the currency in which the Call amount is denominated, if applicable.	ISO 4217 Char(3) Allowable values: Currencies included in ISO 4217	×	✓	×	×	×
93	Put currency	For foreign exchange options, the currency in which the Put amount is denominated, if applicable.	ISO 4217 Char(3) Allowable values: Currencies included in ISO 4217	×	✓	×	×	×
94	Quantity unit of measure - Leg 1	Where applicable: unit of measure in which the Total notional quantity and the Notional quantity schedules are expressed of leg 1.	ISO 20022: ProductQuantity/UnitOfMeasure Char(4) Allowable values: ISO 20022: approved external UnitOfMeasureCode codeset	×	×	✓	×	✓

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Row no.	Data Element Name	Definition of Data Element	Format and allowable values	Data element applicable to asset class				
				IR	FX	EQ	CD	CM
95	Quantity unit of measure - Leg 2	Where applicable: unit of measure in which the Total notional quantity and the Notional quantity schedules are expressed of leg 2.	ISO 20022: ProductQuantity/UnitOfMeasure Char(4) Allowable values: ISO 20022: approved external UnitOfMeasureCode codeset	×	×	✓	×	✓
96	Notional amount schedule - Unadjusted date on which the associated notional amount becomes effective - Leg 1	Where applicable: for OTC derivative transactions negotiated in monetary amounts with a notional amount schedule: Unadjusted date on which the associated notional amount becomes effective of leg 1. The initial notional amount and associated unadjusted effective and end date are reported as the first values of the schedule. This data element is not applicable to OTC derivative transactions with notional amounts that are condition- or event-dependent.	ISO 8601 YYYY-MM-DD, based on UTC, repeatable for each date.	✓	✓	✓	✓	✓
97	Notional amount schedule - Unadjusted date on which the associated notional amount becomes effective - Leg 2	Where applicable: for OTC derivative transactions negotiated in monetary amounts with a notional amount schedule: Unadjusted date on which the associated notional amount becomes effective of leg 2. The initial notional amount and associated unadjusted effective and end date are reported as the first values of the schedule. This data element is not applicable to OTC derivative transactions with notional amounts that are condition- or event-dependent.	ISO 8601 YYYY-MM-DD, based on UTC, repeatable for each date.	✓	✓	✓	✓	✓
98	Notional amount schedule - Unadjusted end date of the notional amount - Leg 1	Where applicable: for OTC derivative transactions negotiated in monetary amounts with a notional amount schedule: Unadjusted end date of the notional amount of leg 1 (not applicable if the unadjusted end date of a given schedule's period is back-to-back with the unadjusted effective date of the subsequent period) The initial notional amount and associated unadjusted effective and end date are reported as the first values of the schedule. This data element is not applicable to OTC derivative transactions with notional amounts that are condition- or event-dependent.	ISO 8601 YYYY-MM-DD, based on UTC, repeatable for each date.	✓	✓	✓	✓	✓
99	Notional amount schedule - Unadjusted end date of the notional amount - Leg 2	Where applicable: for OTC derivative transactions negotiated in monetary amounts with a notional amount schedule: Unadjusted end date of the notional amount of leg 2 (not applicable if the unadjusted end date of a given schedule's period is back-to-back with the unadjusted effective date of the subsequent period) The initial notional amount and associated unadjusted effective and end date are reported as the first values of the schedule. This data element is not applicable to OTC derivative transactions with notional amounts that are condition- or event-dependent.	ISO 8601 YYYY-MM-DD, based on UTC, repeatable for each date.	✓	✓	✓	✓	✓
100	Notional amount schedule - Notional amount which becomes effective on the associated unadjusted effective date - Leg 1	Where applicable: for OTC derivative transactions negotiated in monetary amounts with a notional amount schedule: Notional amount which becomes effective on the associated unadjusted effective date of leg 1. The initial notional amount and associated unadjusted effective and end date are reported as the first values of the schedule. This data element is not applicable to OTC derivative transactions with notional amounts that are condition- or event-dependent. The currency of the varying notional amounts in the schedule is reported in Notional currency.	ISO 20022: Derivative/NotionalCurrencyAndAmount Num(25,5) Any value Repeatable for each notional amount.	✓	✓	✓	✓	✓
101	Notional amount schedule - Notional amount which becomes effective on the associated unadjusted effective date - Leg 2	Where applicable: for OTC derivative transactions negotiated in monetary amounts with a notional amount schedule: Notional amount which becomes effective on the associated unadjusted effective date of leg 2. The initial notional amount and associated unadjusted effective and end date are reported as the first values of the schedule. This data element is not applicable to OTC derivative transactions with notional amounts that are condition- or event-dependent. The currency of the varying notional amounts in the schedule is reported in Notional currency.	ISO 20022: Derivative/NotionalCurrencyAndAmount Num(25,5) Any value Repeatable for each notional amount.	✓	✓	✓	✓	✓
102	Total notional quantity - Leg 1	Where applicable: aggregate Notional quantity of the underlying asset for the term of the transaction of leg 1, if applicable. Where the Total notional quantity is not known when a new transaction is reported, the Total notional quantity is updated as it becomes available.	Num(25,5) Any value greater than or equal to zero.	×	×	✓	×	✓
103	Total notional quantity - Leg 2	Where applicable: aggregate Notional quantity of the underlying asset for the term of the transaction of leg 2, if applicable. Where the Total notional quantity is not known when a new transaction is reported, the Total notional quantity is updated as it becomes available.	Num(25,5) Any value greater than or equal to zero.	×	×	✓	×	✓
104	Notional quantity schedule - Unadjusted date on which the associated notional quantity becomes effective - Leg 1	Where applicable: for OTC derivative transactions negotiated in non-monetary amounts with a Notional quantity schedule: Unadjusted date on which the associated notional quantity becomes effective of leg 1. The initial notional quantity and associated unadjusted effective and end date are be reported as the first values of the schedule. This data element is not applicable to OTC derivative transactions with notional quantities that are condition- or event-dependent.	ISO 8601 YYYY-MM-DD, based on UTC, repeatable for each date.	×	×	×	×	✓
105	Notional quantity schedule - Unadjusted date on which the associated notional quantity becomes effective - Leg 2	Where applicable: for OTC derivative transactions negotiated in non-monetary amounts with a Notional quantity schedule: Unadjusted date on which the associated notional quantity becomes effective of leg 2. The initial notional quantity and associated unadjusted effective and end date are be reported as the first values of the schedule. This data element is not applicable to OTC derivative transactions with notional quantities that are condition- or event-dependent.	ISO 8601 YYYY-MM-DD, based on UTC, repeatable for each date.	×	×	×	×	✓
106	Notional quantity schedule - Unadjusted end date of the notional quantity - Leg 1	Where applicable: for OTC derivative transactions negotiated in non-monetary amounts with a Notional quantity schedule: Unadjusted end date of the notional quantity of leg 1. (not applicable if the unadjusted end date of a given schedule's period is back-to-back with the unadjusted effective date of the subsequent period) The initial notional quantity and associated unadjusted effective and end date are be reported as the first values of the schedule. This data element is not applicable to OTC derivative transactions with notional quantities that are condition- or event-dependent.	ISO 8601 YYYY-MM-DD, based on UTC, repeatable for each date.	×	×	×	×	✓

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Row no.	Data Element Name	Definition of Data Element	Format and allowable values	Data element applicable to asset class				
				IR	FX	EQ	CD	CM
107	Notional quantity schedule - Unadjusted end date of the notional quantity - Leg 2	Where applicable: for OTC derivative transactions negotiated in non-monetary amounts with a Notional quantity schedule: Unadjusted end date of the notional quantity of leg 2. (not applicable if the unadjusted end date of a given schedule's period is back-to-back with the unadjusted effective date of the subsequent period) The initial notional quantity and associated unadjusted effective and end date are be reported as the first values of the schedule. This data element is not applicable to OTC derivative transactions with notional quantities that are condition- or event-dependent.	ISO 8601 YYYY-MM-DD, based on UTC, repeatable for each date.	×	×	×	×	✓
108	Notional quantity schedule - Notional quantity which becomes effective on the associated unadjusted effective date - Leg 1	Where applicable: for OTC derivative transactions negotiated in non-monetary amounts with a Notional quantity schedule: Notional quantity which becomes effective on the associated unadjusted effective date of leg 1. The initial notional quantity and associated unadjusted effective and end date are be reported as the first values of the schedule. This data element is not applicable to OTC derivative transactions with notional quantities that are condition- or event-dependent.	Num(25,5) Any value greater than or equal to zero. Repeatable for each notional quantity.	×	×	×	×	✓
109	Notional quantity schedule - Notional quantity which becomes effective on the associated unadjusted effective date - Leg 2	Where applicable: for OTC derivative transactions negotiated in non-monetary amounts with a Notional quantity schedule: Notional quantity which becomes effective on the associated unadjusted effective date of leg 2. The initial notional quantity and associated unadjusted effective and end date are be reported as the first values of the schedule. This data element is not applicable to OTC derivative transactions with notional quantities that are condition- or event-dependent.	Num(25,5) Any value greater than or equal to zero. Repeatable for each notional quantity.	×	×	×	×	✓
110	CDS index attachment point	Defined lower point at which the level of losses in the underlying portfolio reduces the notional of a tranche. For example, the notional in a tranche with an attachment point of 3% will be reduced after 3% of losses in the portfolio have occurred. This data element is not applicable if the transaction is not a CDS tranche transaction (index or custom basket).	ISO 20022: Tranche/AttachmentPoint Num(11,10) Any value between 0 and 1 (including 0 and 1), expressed as decimal (e.g. 0.05 instead of 5%).	×	×	×	✓	×
111	CDS index detachment point	Defined point beyond which losses in the underlying portfolio no longer reduce the notional of a tranche. For example, the notional in a tranche with an attachment point of 3% and a detachment point of 6% will be reduced after there have been 3% of losses in the portfolio. 6% losses in the portfolio deplete the notional of the tranche. This data element is not applicable if the transaction is not a CDS tranche transaction (index or custom basket).	ISO 20022: Tranche/AttachmentPoint Num(11,10) Any value between 0 and 1 (including 0 and 1), expressed as decimal (e.g. 0.05 instead of 5%).	×	×	×	✓	×
112	Other payment amount	Payment amounts with corresponding payment types to accommodate requirements of transaction descriptions from different asset classes, if applicable.	Num(25,5) Any value greater than or equal to zero. Repeatable in the case of multiple payments	✓	✓	✓	✓	✓
113	Other payment type	Type of Other payment amount, if applicable. Option premium payment is not included as a payment type as premiums for option are reported using the option premium dedicated data element.	Char(4) Repeatable in the case of multiple payments Allowable values: UFRO = Upfront Payment, i.e. the initial payment made by one of the counterparties either to bring a transaction to fair value or for any other reason that may be the cause of an off-market transaction UWIN = Unwind or Full termination, i.e. the final settlement payment made when a transaction is unwound prior to its end date; Payments that may result due to full termination of derivative transaction(s) PEXH = Principal Exchange, i.e. Exchange of notional values for cross- currency swaps	✓	✓	✓	✓	✓
114	Other payment currency	Currency in which Other payment amount is denominated, if applicable.	ISO 4217 Char(3) Repeatable in the case of multiple payments Allowable values: Currencies included in ISO 4217	✓	✓	✓	✓	✓
115	Other payment date	Unadjusted date on which the other payment amount is paid, if applicable.	ISO 8601 YYYY-MM-DD, based on UTC. Repeatable in the case of multiple payments	✓	✓	✓	✓	✓
116	Other payment payer	Identifier of the payer of Other payment amount, if applicable.	ISO 17442 Legal Entity Identifier (LEI) Char(20), for an LEI code Varchar(72), for natural persons who are acting as private individuals (not eligible for an LEI per the ROC Statement - Individuals Acting in a Business Capacity). Repeatable in the case of multiple payments Allowable values: LEI code that is included in the LEI data as published by the Global LEI Foundation (GLEIF, www.gleif.org/). For natural persons who are acting as private individuals (not eligible for an LEI per the ROC Statement - Individuals Acting in a Business Capacity): LEI of the reporting counterparty followed by a unique identifier assigned and maintained consistently by the reporting counterparty for that natural person(s) for regulatory reporting purpose.	✓	✓	✓	✓	✓
117	Other payment receiver	Identifier of the receiver of Other payment amount, if applicable.	ISO 17442 Legal Entity Identifier (LEI) Char(20), for an LEI code Varchar(72), for natural persons who are acting as private individuals (not eligible for an LEI per the ROC Statement - Individuals Acting in a Business Capacity). Repeatable in the case of multiple payments Allowable values: LEI code that is included in the LEI data as published by the Global LEI Foundation (GLEIF, www.gleif.org/). For natural persons who are acting as private individuals (not eligible for an LEI per the ROC Statement - Individuals Acting in a Business Capacity): LEI of the reporting counterparty followed by a unique identifier assigned and maintained consistently by the reporting counterparty for that natural person(s) for regulatory reporting purpose.	✓	✓	✓	✓	✓

Appendix B to the Consultation Paper - List of Proposed Data Elements

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	Data element applicable to asset class				
				IR	FX	EQ	CD	CM
118	Package identifier	Where applicable: identifier (determined by the Reporting Party) in order to connect - two or more transactions that are reported separately by the reporting counterparty, but that are negotiated together as the product of a single economic agreement. - two or more reports pertaining to the same transaction whenever jurisdictional reporting requirement does not allow the transaction to be reported with a single report to TRs. A package may include reportable and non-reportable transactions. This data element is not applicable - if no package is involved, or - to allocations Where the package identifier is not known when a new transaction is reported, the package identifier is updated as it becomes available.	Varchar(35) Up to 35 alphanumerical characters.	✓	✓	✓	✓	✓
119	Package transaction price	Where applicable: traded price of the entire package in which the reported derivative transaction is a component. This data element is not applicable if - no package is involved, or - package transaction spread is used Prices and related data elements of the transactions (Price currency, Price notation, Price unit of measure) that represent individual components of the package are reported when available. The package transaction price may not be known when a new transaction is reported but may be updated later.	ISO 20022: Price/Amount Num(18,13), if Package transaction price notation = 1 Num(11,10), if Package transaction price notation = 3 Any value, if Package transaction price notation = 1 Any value expressed as decimal (eg 0.0257 instead of 2.57%), if Package transaction price notation = 3	✓	✓	✓	✓	✓
120	Package transaction price currency	Where applicable: currency in which the Package transaction price is denominated. This data element is not applicable if - no package is involved, or - Package transaction spread is used, or - Package transaction price notation = 3	ISO 4217 Char(3) Allowable values: Currencies included in ISO 4217	✓	✓	✓	✓	✓
121	Package transaction price notation	Where applicable: manner in which the Package transaction price is expressed. This data element is not applicable if - no package is involved, or - Package transaction spread is used	Char(1) Allowable values: 1 = monetary amount 3 = decimal	✓	✓	✓	✓	✓
122	Package transaction spread	Where applicable: traded price of the entire package in which the reported derivative transaction is a component of a package transaction. Package transaction price when the price of the package is expressed as a spread, difference between two reference prices. This data element is not applicable if - no package is involved, or - Package transaction price is used Spread and related data elements of the transactions (spread currency, Spread notation) that represent individual components of the package are reported when available. Package transaction spread may not be known when a new transaction is reported but may be updated later.	ISO 20022: Spread/SpreadRate or ISO 20022: Spread/PriceOffset or ISO 20022: Spread: BasisPointSpread Num(18,13), if Package transaction spread notation = 1 Num(11,10), if Package transaction spread notation = 3 Num(5), if Package transaction spread notation = 4 Any value, if Package transaction spread notation = 1 Any value expressed as decimal (eg 0.0257 instead of 2.57%), Package spread price notation = 3 Any integer value expressed in basis points (eg 257 instead of 2.57%), if Package transaction spread notation = 4	✓	✓	✓	✓	✓
123	Package transaction spread currency	Where applicable: currency in which the Package transaction spread is denominated. This data element is not applicable if - no package is involved, or - Package transaction price is used, or - Package transaction spread notation = 3 or = 4	ISO 4217 Char(3) Allowable values: Currencies included in ISO 4217	✓	✓	✓	✓	✓
124	Package transaction spread notation	Where applicable: manner in which the Package transaction spread is expressed. This data element is not applicable if • no package is involved, or • Package transaction price is used	Char(1) Allowable values: 1 = monetary amount 3 = decimal 4 = basis points	✓	✓	✓	✓	✓
125	Prior UTI (for one-to-one and one-to-many relations between transactions)	Where applicable: UTI assigned to the predecessor transaction that has given rise to the reported transaction due to a lifecycle event, in a one-to-one relation between transactions (eg in the case of a novation, when a transaction is terminated, and a new transaction is generated) or in a one- to-many relation between transactions (eg in clearing or if a transaction is split into several different transactions). This data element is not applicable when reporting many-to-one and many-to-many relations between transactions (eg in the case of a compression).	ISO 23897 Unique transaction identifier Varchar(52) Up to 52 alphanumeric characters	✓	✓	✓	✓	✓
126	Custom basket code	Where applicable: if the OTC derivative transaction is based on a custom basket, unique code assigned by the structurer of the custom basket to link its constituents. This data element is not applicable if no custom basket is involved or no unique code has been assigned to it.	Varchar(72) ISO 17442 Legal Entity Identifier (LEI) code of the basket structurer followed by a unique identifier up to 52 alphanumeric characters.	✓	✓	✓	✓	✓
127	Basket constituent identifier	An identifier that represents a constituent of an underlying custom basket,in line with the Underlier ID within the ISO 4914 UPI reference data elements, as maintained by the UPI Service Provider or in line with an identifier that would be reported as an Underlier ID (Other) where the UPI Underlier ID is 'OTHER'. This data element is not applicable if no custom basket is involved.	Varchar(350) An identifier that can be used to determine an asset, index or benchmark included in a basket Up to 350 alphanumeric characters. Repeatable in the case of multiple basket constituents	✓	✓	✓	✓	✓
128	Basket constituent unit of measure	Where applicable: unit of measure in which the number of units of a particular custom basket constituent is expressed. This data element is not applicable if no custom basket is involved.	ISO 20022: ProductQuantity/Unit Of Measure Code Char(4) ISO 20022: approved external UnitOfMeasureCode codeset Repeatable in the case of multiple basket constituents	✓	✓	✓	✓	✓
129	Basket constituent number of units	Where applicable: the number of units of a particular constituent in a custom basket. This data element is not applicable if no custom basket is involved.	Num(18,13) Any value greater than zero. Repeatable in the case of multiple basket constituents	✓	✓	✓	✓	✓

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Row no.	Data Element Name	Definition of Data Element	Format and allowable values	Data element applicable to asset class				
				IR	FX	EQ	CD	CM
130	Basket constituent identifier source	Where applicable: the origin, or publisher, of the associated Basket constituent identifier, in line with the Underlier ID source within the ISO 4914 UPI reference data elements as maintained by the UPI Service Provider or in line with the allowable value that would be reported as an Underlier ID (Other) source where the UPI Underlier ID is 'OTHER'. This data element is not applicable if no custom basket is involved.	Varchar(350) The origin, or publisher, of the associated basket constituent identifier. Up to 350 alphanumeric characters. Repeatable in the case of multiple basket constituents	✓	✓	✓	✓	✓
131	Underlier ID (OTHER)	Where applicable: the asset(s), index (indices) or benchmark underlying a contract or, in the case of a foreign exchange derivative, identification of index. This data element is applicable when the value of Underlier ID is submitted as 'OTHER' to the UPI service provider.	Varchar(350) An identifier that can be used to determine the asset(s), index (indices) or benchmark underlying a contract. Up to 350 alphanumeric characters.	✓	✓	✓	✓	✓
132	Underlier ID (OTHER) source	Where applicable: the origin, or publisher, of the associated Underlier ID (Other). This data element is applicable when the value of Underlier ID source is submitted as 'OTHER' to the UPI service provider.	Varchar(350) The origin, or publisher, of the associated Underlier ID. Up to 350 alphanumeric characters.	✓	✓	✓	✓	✓
133	Underlying asset trading platform identifier	Where applicable: for a platform (e.g. exchange) traded underlying asset, the platform on which the asset is traded. This data element is not applicable to OTC derivative transactions with custom basket constituents.	ISO 10383 Segment Market Identifier Code (MIC) Char(4) ISO 10383 Segment Market identifier codes.	✓	✓	✓	✓	✓
134	Underlying asset price source	Where applicable: for an underlying asset or benchmark not traded on a platform, the source of the price used to determine the value or level of the asset or benchmark. This data element is not applicable to OTC derivative transactions with custom basket constituents.	Varchar(50) Up to 50 alphanumeric characters.	✓	✓	✓	✓	✓
135	Crypto asset underlying indicator	Where applicable: indicator of whether the underlying of the derivative is crypto asset. This element should be reported as 'true' if any of the underlyings is a crypto asset (immediate or ultimate underlying as well as where the derivative is based on a mix of crypto assets and other underlyings).	Boolean Allowable values: true, if underlying is crypto asset false, if underlying is not crypto asset	✓	✓	✓	✓	✓
136	Action type	Type of action taken on the transaction or type of end-of-day reporting.	Char(4) Allowable values: NEWT = New *The creation of the first transaction resulting in the generation of a new UTI.* MODI = Modify *A modification of the terms of a previously reported transaction due to a newly negotiated modification (amendment) or a filling in of not available missing information (e.g., post price transaction). It does not include correction of a previously reported transaction.* CORR = Correct *A correction of erroneous data of a previously reported transaction.* EROR = Error *A cancellation of a wrongly submitted entire transaction in case it never came into existence or was not subject to the reporting requirements under the applicable law of a given jurisdiction, or a cancellation of a duplicate report.* TERM = Terminate *A termination of a previously reported transaction.* REVI = Revive *An action that reinstates a reported transaction that was reported with action type "Error" or terminated by mistake or expired due to an incorrectly reported Expiration date.* PRTO = Transfer out *A transfer of a transaction from one reporting agent to another reporting agent (change of reporting agent).* VALU = Valuation *An update of a valuation of a transaction. There will be no corresponding Event type.* MARU = Collateral/Margin update *An update to collateral margin data. There will be no corresponding Event type.*	✓	✓	✓	✓	✓
137	Event type	Explanation or reason for the action being taken on the transaction.	Char(4) Allowable values: TRAD = Trade *Creation or modification of a transaction.* NOVA = Novation/Step-in *A novation or step-in legally moves part or all of the financial risks of a transaction from a transferor to a transferee and has the effect of terminating/modifying the original transaction so that it is either terminated or its notional is modified.* COMP = Post trade risk reduction exercise *Compressions and other post trade risk reduction exercises generally have the effect either of terminating or modifying (i.e., reducing the notional value) a set of existing transactions and/or of creating a set of new transaction(s). These processes result in largely the same exposure of market risk that existed prior to the event for the counterparty.* ETRM = Early termination *Termination of an existing transaction prior to expiration date.* CLRG = Clearing *Central clearing is a process where a central counterparty (CCP) interposes itself between counterparties to transactions, becoming the buyer to every seller and the seller to every buyer and thereby ensuring the performance of open transactions. It has the effect of terminating an existing transaction between the buyer and the seller.* EXER = Exercise *The full or partial exercise of an option or swaption by one counterparty of the transaction.* ALOC = Allocation *The process by which portions of a single transaction (or multiple transactions) are allocated to one or multiple different counterparties and reported as new transactions.*	✓	✓	✓	✓	✓

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Row no.	Data Element Name	Definition of Data Element	Format and allowable values	Data element applicable to asset class				
				IR	FX	EQ	CD	CM
			CLAL = Clearing & Allocation *A simultaneous clearing and allocation event in a central counterparty (CCP).* CREV = Credit event *An event that results in a modification or a termination of a previously submitted credit transaction. Applies only to credit derivatives.* PTNG = Transfer *The process by which a transaction is transferred to another reporting agent that has the effect of the closing of the transaction reported by one reporting agent and opening of the same transaction using the same UTI by a different agent.* CORP = Corporate event *The process by which a corporate action is taken on equity underlying that impacts the transactions on that equity.* UPDT = Update *Update of an outstanding transaction performed in order to ensure its conformity with the amended reporting requirements.*					
138	Event timestamp	Date and time of occurrence of the event. In the case of a modification agreed for a future date, this data element should reflect the date, the modification occurs (becomes effective) and not when it was negotiated. In the case of a correction, this data element should reflect the date and time as of when the correction is applicable. In the case of a clearing event, this data element should reflect the recorded date and time when the alpha transaction is accepted by the central counterparty (CCP) for clearing. In the case of collateral update, the date and time for which the information contained in the report is provided.	ISO 8601 YYYY-MM-DDThh:mm:ssZ, based on UTC.	✓	✓	✓	✓	✓
139	Event identifier	Where applicable: Unique identifier to link transactions entering into and resulting from an event, which may be, but is not limited to, compression or other post trade risk reduction exercises, credit event, etc. The unique identifier may be assigned by the reporting counterparty or a service provider or CCP providing the service.	Varchar(52) ISO 17442 Legal Entity Identifier (LEI) code of the entity assigning the event identifier followed by a unique identifier up to 32 characters.	✓	✓	✓	✓	✓
140	Unique Transaction Identifier (UTI)	The unique transaction identifier as described in the Technical Guidance on the Harmonization of the Unique Transaction Identifier published by the Committee on Payments and Market Infrastructures and Board of International Organization of Securities Commissions in February 2017.	ISO 23897 - Unique transaction identifier Varchar(52) Up to 52 alphanumeric characters, only the he upper-case alphabetic characters A–Z and the digits 0–9 are allowed	✓	✓	✓	✓	✓
141	Unique Product Identifier (UPI)	A unique set of characters that represents a particular OTC derivative.	ISO 4914 - Unique product identifier UPI code in accordance with the ISO standard implemented pursuant to the FSB governance arrangements for the UPI	✓	✓	✓	✓	✓
142	Notional quantity - Leg 1	Where applicable, Notional quantity of leg 1. For swap transactions negotiated in non-monetary amounts with fixed notional quantity for each schedule period (i.e., 50 barrels per month). The frequency is reported in Quantity frequency and the unit of measure is reported in Quantity unit of measure.	Num(25,5) Any value greater than or equal to zero.	×	×	×	×	✓
143	Notional quantity - Leg 2	Where applicable, Notional quantity of leg 2. For swap transactions negotiated in non-monetary amounts with fixed notional quantity for each schedule period (i.e., 50 barrels per month). The frequency is reported in Quantity frequency and the unit of measure is reported in Quantity unit of measure.	Num(25,5) Any value greater than or equal to zero.	×	×	×	×	✓
144	Quantity frequency - Leg 1	The rate at which the quantity is quoted on the leg 1 of the swap transaction. e.g., hourly, daily, weekly, monthly, if applicable.	Char(4) Allowable values: HOUL = Hourly DAIL = Daily WEEK = Weekly MNTH = Monthly ONDE = OnDemand YEAR = Yearly EXPI = End of term ADHO = Ad hoc which applies when payments are irregular	×	×	×	×	✓
145	Quantity frequency - Leg 2	The rate at which the quantity is quoted on the leg 2 of the swap transaction. e.g., hourly, daily, weekly, monthly, if applicable.	Char(4) Allowable values: HOUL = Hourly DAIL = Daily WEEK = Weekly MNTH = Monthly ONDE = OnDemand YEAR = Yearly EXPI = End of term ADHO = Ad hoc which applies when payments are irregular	×	×	×	×	✓
146	Quantity frequency multiplier - Leg 1	The number of time units for the Quantity frequency of leg 1, if applicable.	Num(3,0) Any value greater than or equal to zero.	×	×	×	×	✓
147	Quantity frequency multiplier - Leg 2	The number of time units for the Quantity frequency of leg 2, if applicable.	Num(3,0) Any value greater than or equal to zero.	×	×	×	×	✓
148	Fixing date - Leg 1	Describes the specific date when a non-deliverable forward as well as various types of FX OTC options such as cash-settled options that will "fix" against a particular exchange rate, which will be used to compute the ultimate cash settlement of leg 1, if applicable.	ISO 8601 YYYY-MM-DD, based on UTC.	×	✓	×	×	×
149	Fixing date - Leg 2	Describes the specific date when a non-deliverable forward as well as various types of FX OTC options such as cash-settled options that will "fix" against a particular exchange rate, which will be used to compute the ultimate cash settlement of leg 2, if applicable.	ISO 8601 YYYY-MM-DD, based on UTC.	×	✓	×	×	×

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Row no.	Data Element Name	Definition of Data Element	Format and allowable values	Data element applicable to asset class				
				IR	FX	EQ	CD	CM
150	Floating rate reset frequency period - Leg 1	Where applicable: time unit associated with the frequency of payments resets, e.g. day, week, month, year or term of the stream for the floating rate of leg 1.	Char(4) Allowable values: DAIL = Daily WEEK = Weekly MNTH = Monthly YEAR = Yearly ADHO = Ad hoc which applies when payments are irregular EXPI = Payment at term	✓	×	✓	✓	✓
151	Floating rate reset frequency period - Leg 2	Where applicable: time unit associated with the frequency of payments resets, e.g. day, week, month, year or term of the stream for the floating rate of leg 2.	Char(4) Allowable values: DAIL = Daily WEEK = Weekly MNTH = Monthly YEAR = Yearly ADHO = Ad hoc which applies when payments are irregular EXPI = Payment at term	✓	×	✓	✓	✓
152	Floating rate reset frequency multiplier - Leg 1	Where applicable: number of time units (as expressed by the payment frequency period) that determines the frequency at which periodic payment resets dates occur for the floating rate of leg 1. For example, a transaction with payments occurring every two months is represented with a payment frequency period of “MNTH” (monthly) and a payment frequency period multiplier of 2. This data element is not applicable if the payment frequency period is “ADHO”. If payment frequency period is “TERM”, then the payment frequency period multiplier is 1. If the payment frequency is intraday, then the payment frequency period is “DAIL” and the payment frequency multiplier is 0.	Num(3,0) Any value greater than or equal to zero.	✓	×	✓	✓	✓
153	Floating rate reset frequency multiplier - Leg 2	Where applicable: number of time units (as expressed by the payment frequency period) that determines the frequency at which periodic payment resets dates occur for the floating rate of leg 2. For example, a transaction with payments occurring every two months is represented with a payment frequency period of “MNTH” (monthly) and a payment frequency period multiplier of 2. This data element is not applicable if the payment frequency period is “ADHO”. If payment frequency period is “TERM”, then the payment frequency period multiplier is 1. If the payment frequency is intraday, then the payment frequency period is “DAIL” and the payment frequency multiplier is 0.	Num(3,0) Any value greater than or equal to zero.	✓	×	✓	✓	✓
154	Index factor	The index version factor or percent, expressed as a decimal value, that multiplied by the Notional amount yields the notional amount covered by the seller of protection for credit default swap, if applicable.	Num(11,10) Any value between 0 and 1 (including 0 and 1), expressed as decimal (e.g.0.05 instead of 5%).	×	×	×	✓	×
155	Embedded option type	Type of option or optional provision embedded in a contract, if applicable.	Char(4) Allowable values: MDET = Mandatory early termination OPET = Optional early termination CANC = Cancellable EXTD = Extendible OTHR = Other	✓	✓	✓	✓	✓
156	Initial margin collateral portfolio code	If collateral is reported on a portfolio basis, a unique code assigned by the reporting counterparty to the portfolio that tracks the aggregate initial margin of a set of open swap transactions, if applicable. This data element is not applicable if the collateralisation was performed on a transaction level basis, or if there is no collateral agreement, or if no collateral is posted or received or if only one collateral portfolio of amounts of margin that does not distinguish between margin that is initial margin and margin that is variation margin.	Varchar(52) Up to 52 alphanumeric characters.	✓	✓	✓	✓	✓
157	Portfolio containing non-reportable component indicator	If collateral is reported on a portfolio basis, indicator of whether the collateral portfolio includes swap transactions exempt from reporting., if applicable.	Boolean Allowable values: true: for collateral portfolio contains one or more nonreported transactions; or false: for collateral portfolio does not contain one or more non-reported transactions	✓	✓	✓	✓	✓
158	Variation margin collateral portfolio code	If collateral is reported on a portfolio basis, a unique code assigned by the reporting counterparty to the portfolio that tracks the aggregate variation margin related to a set of open swap transactions, if applicable. This data element is not applicable if the collateralisation was performed on a transaction level basis, or if there is no collateral agreement, or if no collateral is posted or received or if only one collateral portfolio of amounts of margin that does not distinguish between margin that is initial margin and margin that is variation margin.	Varchar(52) Up to 52 alphanumeric characters.	✓	✓	✓	✓	✓
159	Submitting Party	In the case where the entity responsible for reporting has delegated the submission of the report to a third party or to the other counterparty, this entity has to be identified in this field by a unique code. Otherwise the entity responsible for reporting should be identified in this field.	ISO 17442 Legal Entity Identifier (LEI) Char(20) LEI code that is included in the LEI data as published by the Global LEI Foundation (GLEIF, www.gleif.org/).	✓	✓	✓	✓	✓
160	Entity responsible for reporting	Identification code of the Reporting Party who has the obligation to report the transaction.	ISO 17442 Legal Entity Identifier (LEI) Char(20)	✓	✓	✓	✓	✓
161	Country of the counterparty 2	The code of country where the registered office of the other counterparty is located or country of residence in case that the other counterparty is a natural person.	ISO 3166 - 2 character country code	✓	✓	✓	✓	✓
162	Broker ID	If a broker acted as intermediary for the Reporting Entity in relation to the Reportable Transaction, without becoming a counterparty to the OTC Derivative the subject of the Reportable Transaction, the current LEI of the broker.	ISO 17442 Legal Entity Identifier (LEI) Char(20) LEI code that is included in the LEI data as published by the Global LEI Foundation (GLEIF, www.gleif.org/).	✓	✓	✓	✓	✓

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Row no.	Data Element Name	Definition of Data Element	Format and allowable values	Data element applicable to asset class				
				IR	FX	EQ	CD	CM
163	Contract type	Each reported contract shall be classified according to its type, if applicable.	Char(4) Allowable values: CFDS = Financial contracts for difference FRAS = Forward rate agreements FUTR = Futures FORW = Forwards OPTN = Option SPDB = Spreadbet SWAP = Swap SWPT = Swaption OTHR = Other	✓	✓	✓	✓	✓
164	Asset Class	Each reported contract shall be classified according to the asset class it is based on, if applicable.	Char(4) Allowable values: CRDT - Credit CURR - Currency EQUI - Equity INTR - Interest Rate COMM - Commodity	✓	✓	✓	✓	✓
165	Underlying identification type	The type of relevant underlying identifier, if applicable.	Char(1) Allowable values: I = ISIN B = Basket X = Index	✓	×	✓	✓	✓
166	Underlying identification	The direct underlying shall be identified by using a unique identification for this underlying based on its type. For Credit Default Swaps, the ISIN of the reference obligation should be provided, if applicable.	For underlying identification type I: ISO 6166 ISIN 12 character alphanumeric code For underlying identification type X: ISO 6166 ISIN if available	✓	×	✓	✓	✓
167	Name of the underlying index	The full name of the underlying index as assigned by the index provider, if applicable.	Varchar(50) Up to 50 alphanumeric characters. Special characters are allowed if they form part of the full name of the index.	✓	×	✓	✓	✓
168	Clearing timestamp	Time and date when clearing took place, if applicable.	ISO 8601 YYYY-MM-DDThh:mm:ssZ, based on UTC.	✓	✓	✓	✓	✓
169	Delivery type	Indicates whether the contract is settled physically or in cash, if applicable.	Char(4) Allowable values: CASH = Cash PHYS = Physical OPTL = Optional for counterparty or when determined by a third party	✓	✓	✓	✓	✓
170	Identifier of the floating rate - Leg 1	Where applicable: an identifier of the interest rates used which are reset at predetermined intervals by reference to a market reference rate of leg 1.	If the floating rate has an ISIN, the ISIN code for that rate.	✓	×	✓	✓	✓
171	Indicator of the floating rate - Leg 1	An indication of the interest rate of leg 1, where available.	Char(4) The indication of the floating rate index. ESTR = €STR SONA = SONIA SOFR = SOFR EONA = EONIA EONS = EONIA SWAP EURI = EURIBOR EUUS = EURODOLLAR EUCH = EuroSwiss GCFR = GCF REPO ISDA = ISDAFIX LIBI = LIBID LIBO = LIBOR MAAA = Muni AAA PFAN = Pfandbriefe TIBO = TIBOR STBO = STIBOR BBSW = BBSW JIBA = JIBAR BUBO = BUBOR CDOR = CDOR CIBO = CIBOR MOSP = MOSPRIM NIBO = NIBOR PRBO = PRIBOR TLBO = TELBOR WIBO = WIBOR TREA = Treasury SWAP = SWAP FUSW = Future SWAP EFFR = Effective Federal Funds Rate OBFR = Overnight Bank Funding Rate CZNA = CZEONIA	✓	×	✓	✓	✓
172	Name of the floating rate - Leg 1	The full name of the interest rate as assigned by the index provider of leg 1, if applicable.	Varchar(50) Up to 50 alphanumeric characters. Special characters are allowed if they form part of the full name of the index.	✓	×	✓	✓	✓
173	Floating rate reference period - Leg 1 – time period	Time period describing the reference period for the floating rate of leg 1, if applicable.	Char(4) Allowable values: DAIL = daily WEEK = weekly MNTH = monthly YEAR = yearly ADHO = ad hoc which applies when payments are irregular EXPI = payment at term	✓	×	✓	✓	✓
174	Floating rate reference period - Leg 1 – multiplier	Multiplier of the time period describing the reference period for the floating rate of leg 1, if applicable.	Num(3,0) Any integer value greater than or equal to zero up to 3 numeric characters.	✓	×	✓	✓	✓

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Row no.	Data Element Name	Definition of Data Element	Format and allowable values	Data element applicable to asset class				
				IR	FX	EQ	CD	CM
175	Identifier of the floating rate - Leg 2	Where applicable: an identifier of the interest rates used which are reset at predetermined intervals by reference to a market reference rate of leg 2.	If the floating rate has an ISIN, the ISIN code for that rate.	✓	×	✓	✓	✓
176	Indicator of the floating rate - Leg 2	An indication of the interest rate of leg 2, where available.	Char(4) The indication of the floating rate index. ESTR = €STR SONA = SONIA SOFR = SOFR EONA = EONIA EONS = EONIA SWAP EURI = EURIBOR EUUS = EURODOLLAR EUCH = EuroSwiss GCFR = GCF REPO ISDA = ISDAFIX LIBI = LIBID LIBO = LIBOR MAAA = Muni AAA PFAN = Pfandbriefe TIBO = TIBOR STBO = STIBOR BBSW = BBSW JIBA = JIBAR BUBO = BUBOR CDOR = CDOR CIBO = CIBOR MOSP = MOSPRIM NIBO = NIBOR PRBO = PRIBOR TLBO = TELBOR WIBO = WIBOR TREA = Treasury SWAP = SWAP FUSW = Future SWAP EFFR = Effective Federal Funds Rate OBFR = Overnight Bank Funding Rate CZNA = CZEONIA	✓	×	✓	✓	✓
177	Name of the floating rate - Leg 2	The full name of the interest rate as assigned by the index provider of leg 2, if applicable.	Varchar(50) Up to 50 alphanumeric characters. Special characters are allowed if they form part of the full name of the index.	✓	×	✓	✓	✓
178	Floating rate reference period - Leg 2 – time period	Time period describing the reference period for the floating rate of leg 2, if applicable.	Char(4) Allowable values: DAIL = daily WEEK = weekly MNTH = monthly YEAR = yearly ADHO = ad hoc which applies when payments are irregular EXPI = payment at term	✓	×	✓	✓	✓
179	Floating rate reference period - Leg 2 – multiplier	Multiplier of the time period describing the reference period for the floating rate of leg 2, if applicable.	Num(3,0) Any integer value greater than or equal to zero up to 3 numeric characters.	✓	×	✓	✓	✓
180	Forward exchange rate	Forward exchange rate as agreed between the counterparties in the contractual agreement It shall be expressed as a price of base currency in the quoted currency, if applicable.	Num(18,13) Any value greater than zero up to 18 numeric digits including up to 13 decimal places. The decimal mark is not counted as a numeric character. If populated, it shall be represented by a dot.	×	✓	×	×	×
181	Base product	Base product as specified in the classification of commodities in Table 4 of the Annex to Implementing Regulation (EU) 2022/1860.	Only values in the 'Base product' column of the classification of commodities derivatives table are allowed.	×	×	×	×	✓
182	Sub-product	Sub-product as specified in the classification of commodities in Table 4 of the Annex to Implementing Regulation (EU) 2022/1860. This field requires a specific base product in field.	Only values in the 'Sub — product' column of the classification of commodities derivatives table are allowed.	×	×	×	×	✓
183	Further sub-product	Further sub product as specified in the classification of commodities in Table 4 of the Annex to Implementing Regulation (EU) 2022/1860. This field requires a specific sub product in field.	Only values in the 'Further sub — product' of the classification of commodities derivatives table are allowed.	×	×	×	×	✓
184	Option type	Indication as to whether the derivative contract is a call (right to purchase a specific underlying asset) or a put (right to sell a specific underlying asset) or whether it cannot be determined whether it is a call or a put at the time of execution of the derivative contract, if applicable. In case of swaptions it shall be: - "Put", in case of receiver swaption, in which the buyer has the right to enter into a swap as a fixed-rate receiver. -"Call", in case of payer swaption, in which the buyer has the right to enter into a swap as a fixed-rate payer. In case of Caps and Floors it shall be: -"Put", in case of a Floor. -"Call", in case of a Cap.	Char(4) Allowable values: PUTO = Put CALL = Call OTHR = where it cannot be determined whether it is a call or a put	✓	✓	✓	✓	✓
185	Option style	Indicates whether the option may be exercised only at a fixed date (European), a series of pre-specified dates (Bermudan) or at any time during the life of the contract (American), if applicable.	Char(4) Allowable values: AMER = American BERM = Bermudan EURO = European	✓	✓	✓	✓	✓
186	Maturity date of the underlying	In case of swaptions, maturity date of the underlying swap, if applicable.	ISO 8601 YYYY-MM-DD, based on UTC.	✓	✓	✓	✓	✓
187	Seniority	Indicates the seniority of the debt security, or debt basket or index underlying a derivative, if applicable.	Char(4) Allowable values: SNDB = Senior, such as Senior Unsecured Debt (Corporate/Financial), Foreign Currency Sovereign Debt (Government) SBOD = Subordinated, such as Subordinated or Lower Tier 2 Debt (Banks), Junior Subordinated or Upper Tier 2 Debt (Banks), OTHR = Other, such as Preference Shares or Tier 1 Capital (Banks) or other credit derivatives	×	×	×	✓	×

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Row no.	Data Element Name	Definition of Data Element	Format and allowable values	Data element applicable to asset class				
				IR	FX	EQ	CD	CM
188	Reference entity	Identification of the underlying reference entity, if applicable.	ISO 3166: 2 character country code, or ISO 3166-2: 2 character country code followed by dash "-" and up to 3 alphanumeric character country subdivision code, or ISO 17442 Legal Entity Identifier (LEI) 20 alphanumeric character code	×	×	×	✓	×
189	Series	The series number of the composition of the index if applicable.	Num(5,0) Any integer value greater than or equal to zero up to 5 numeric characters.	×	×	×	✓	×
190	Series Version	A new version of a series is issued if one of the constituents defaults and the index has to be reweighted to account for the new number of total constituents within the index, if applicable.	Num(5,0) Any integer value greater than or equal to zero up to 5 numeric characters.	×	×	×	✓	×
191	Indicator of the underlying index	An indication of the underlying index, where available.	Char(4) The indication of the floating rate index. ESTR = €STR SONA = SONIA SOFR = SOFR EONA = EONIA EONS = EONIA SWAP EURI = EURIBOR EUUS = EURODOLLAR EUCH = EuroSwiss GCFR = GCF REPO ISDA = ISDAFIX LIBI = LIBID LIBO = LIBOR MAAA = Muni AAA PFAN = Pfandbriefe TIBO = TIBOR STBO = STIBOR BBSW = BBSW JIBA = JIBAR BUBO = BUBOR CDOR = CDOR CIBO = CIBOR MOSP = MOSPRIM NIBO = NIBOR PRBO = PRIBOR TLBO = TELBOR WIBO = WIBOR TREA = Treasury SWAP = SWAP FUSW = Future SWAP EFFR = Effective Federal Funds Rate OBFR = Overnight Bank Funding Rate CZNA = CZEONIA	✓	✓	✓	✓	✓
192	Collateral timestamp	Date and time as of which the values of the margins are reported, if applicable.	ISO 8601 YYYY-MM-DDThh:mm:ssZ, based on UTC.	✓	✓	✓	✓	✓
193	Trading capacity	Identifies the trading capacity of the seller.	Allowable values: AGEN = Agent (Trading as Agent on behalf of a customer) PRIN = Principal (Trading as Principal)	✓	✓	✓	✓	✓
194	Swap Link ID	A linking element used to link the Near Leg and Far Leg of an FX Swap, if applicable.	Varchar(100)	×	✓	×	×	×
195	Trader location	Location of the trading desk or trader responsible for the decision of entering into or execution of the transaction.	ISO 3166 - 2 character country code	✓	✓	✓	✓	✓
196	Booking location	Location of the trade party or the branch/office of the trade party to which the transaction is booked.	ISO 3166 - 2 character country code	✓	✓	✓	✓	✓
197	Intragroup	Indicates whether the contract was entered into as an intragroup transaction. Usage: When absent, default value is false.	Boolean Allowable values: true : contract entered into as an intragroup transaction false : contract not entered into as an intragroup transaction	✓	✓	✓	✓	✓
198	Nature of the counterparty 1	Indicate if the counterparty 1 is a CCP, a financial, non-financial counterparty or other type of counterparty.	F = Financial Counterparty N = Non-Financial Counterparty C = Central Counterparty O = Other	✓	✓	✓	✓	✓
199	Nature of the counterparty 2	Indicate if the counterparty 2 is a CCP, a financial, non-financial counterparty or other type of counterparty.	F = Financial Counterparty N = Non-Financial Counterparty C = Central Counterparty O = Other	✓	✓	✓	✓	✓
200	Non-standardized term indicator	indicates whether the derivative transaction has one or more additional terms or provisions that materially affect the price of the transaction.	Boolean Allowable values: true false	✓	✓	✓	✓	✓
201	Secondary transaction identifier	For internal client code, if applicable.	Subject to ISO message standard	✓	✓	✓	✓	✓
202	Lower or only barrier	To facilitate the reporting of strike values for barrier options, if applicable.	Subject to ISO message standard	✓	✓	✓	✓	✓
203	Upper barrier	To facilitate the reporting of strike values for barrier options, if applicable.	Subject to ISO message standard	✓	✓	✓	✓	✓
204	Business message identifier	An unique user file reference assigned by the Submitting Party on request file	Varchar(35)	✓	✓	✓	✓	✓

Appendix B to the Consultation Paper - List of Proposed Data Elements

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	Data element applicable to asset class				
				IR	FX	EQ	CD	CM
205	Message definition identifier	The Message Definition Identifier of the Business Message instance with which this Business Application Header instance is associated.	Varchar(35) Allowable values are: auth.108.001.01_HKMAUG_DATMDA_1.0.0 auth.030.001.03_HKMAUG_DATTAR_1.0.0	✓	✓	✓	✓	✓
206	Business service	To indicate whether the request is used for Reporting service.	Varchar(35) Allowable values are: Trade Valuation	✓	✓	✓	✓	✓
207	Creation date	Date and time when this Business Message (header) was created.	ISO 8601 YYYY-MM-DDThh:mm:ssZ, based on UTC.	✓	✓	✓	✓	✓
208	Number records	Indicates the number of trade action in the request file.	Num(4,0) Any value greater than zero.	✓	✓	✓	✓	✓
209	Technical record identification	Unique identifier of a trade action used as part of error management and status advice message.	Varchar(140)	✓	✓	✓	✓	✓

Appendix C – Jurisdictions in the SFC designated list gazetted on 7 July 2015

FSB member jurisdictions	Non-FSB member jurisdictions
1. Argentina	1. Algeria
2. France	2. Austria
3. India	3. Bahrain
4. Indonesia	4. Belgium
5. People's Republic of China	5. Hungary
6. Singapore	6. Israel
7. South Korea	7. Luxembourg
8. Switzerland	8. Pakistan
	9. Samoa
	10. Taiwan, China