Reporting under MiFID II/MiFIR

Secure FTP Interface

User Guide

Version 1.1 - 02.11.2017

Version Index

Date	Version	Created by	Description of change
24.10.2017	1.0	João Cruz Morais	Initial Version
02.11.2017	1.1	João Cruz Morais	• 2.1 – details on how amendments will be validated/handled • 3.2 – name change on folder where amendments should be uploaded at • 3.4 – validation on usage of LEI for position reporting

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1   Scope

This user guide provides an overview of the Secure FTP interface that OMIP has developed for its members in order to facilitate the retrieval and, if necessary, the amendment of transactions and positions before these are reported to the National Competent Authority as part of the requirements imposed by MiFIR and MiFID II, respectively.

Important note: amending transactions and positions using the Secure FTP interface is restricted to members that have chosen to set the Risk Reducing Indicator (or Commodities Derivative Indicator) on a per-transaction basis (Transaction Model). Clients that decide to set the indicator on a per-account basis (Trading Account Model) can only amend transactions by issuing an Account Transfer request at OMIClear. More information about the differences between these models is available in the MiFID II/MiFIR Reporting Operational Guide that has already been disclosed by OMIP.

2   Reporting process overview

During the market session OMIP will collect any transactions executed or registered in the exchange and determine the Risk Reducing Indicator of each transaction in accordance with the model chosen by the respective members, as explained previously. Shortly after the market closes at 19:00 CET, the draft transaction reports will be generated and made available in the Secure FTP interface as well as in the ORP Web interface.

Regarding draft position reports, these will be made available after the end-of-day positions are ready for retrieval from the CCP (OMIClear) which occurs between 19:00-20:30 CET. Positions will be calculated at this moment and verified against the positions available at OMIClear, after which the draft position reports will be generated and made available to all members.

If no transactions are registered in the trading day or there are no positions open, then empty reports will be provided.

Regardless of the type of report, members will have until 14:00 CET of the following market day to make amendments after which both reports are considered closed and no further amendments are allowed to those reports.

To summarize:

	Transactions	Positions
Draft report publish time	19:00 CET	19:00 - 20:30 CET
Amendments	Until 14:00 CET	Until 14:00 CET
Data included	Non-cancelled transactions executed or registered during the session	End of day positions for ISINs still in the trading period

2.1 Amendments

Amendments to draft reports are done by uploading new reports on a special directory. These reports can contain all or only a part of the positions/transactions included in the draft reports. Amendments will be validated by OMIP and afterwards an XML receipt will be generated informing if the submission was accepted and which amendments were accepted or rejected, also indicating the reason for rejection on each one. A new incremented revision number will be assigned if all amendments are accepted and at least one causes an effective change. Provided that both conditions are met, than a new draft report will be created reflecting all the changes done to so far, while the old report will be moved to an historical folder. Below is a summary of how amendments will work for each type of report:

	Transaction Amendments	Position Amendments
Required fields	• OMIP UTI or Trayport Trade ID	• Version (Header field) • Environment (Header field) • Report Date • Business Date • Reporting Entity LEI • ISIN • Risk Reducing Indicator • Position Quantity • Position Holder LEI • Position Holder Email • Position Holder Parent LEI • Position Holder Parent Email • Collective Investment Undertaking flag

Fields that can be amended	• Commodities Derivative Indicator
	• ID of Execution Maker
	• ID of Decision Maker
		• Position Holder LEI
		• Risk Reducing Indicator
		• Position Quantity - increments:
		   ○ Mini products: +/- 0.1 MWh
		   ○ Other products +/- 1 MWh
		• Position Holder Email
		• Position Holder Parent LEI
		• Position Holder Parent Email
		• Collective Investment Undertaking flag

Business Validations	• Report is open for modifications • OMIP UTI or Trade ID are valid • Transaction is open for modifications	• Report is open for modifications • {ISIN, Holder LEI, Risk Reducing, Maturity?} unique for each record • ISINs are valid • Sum of Risk Reducing position and Non Risk Reducing position equals the net position available on OMIClear • Hedge position is within the Short/Long range
Partial submissions	Allowed	Allowed for OMIP positions (Off-exchange EEOTC positions (Trading Venue ID = XXXX) must be included in all amendments)
Post-report amendments	Allowed while the transaction is part of a reportable position. Included in the next transaction report.	Not allowed
Supported schema	Based on ESMA DRAFT15auth.016.001.01 ISO20022 schema. Observations: • Files without records can be generated by OMIP • Only the TxId field is required	EFET/FIA ITS4 schema. Observations: • Files without records can be generated by OMIP • Usage of National ID will result in a rejection • NEWT/AMND/CANC are all treated the same • Position maturity should not be provided and if provided it will be replaced by OMIP

2.2 Final reports and end of day reporting to the NCA

After the amendment period is closed, the reporting process will collect the final reports according to the Risk Reducing classification model defined at the member level:

- Transaction Model: last version of the position and transactions reports is collected;
- Trading Account Model: if transactions changed classification due to account transfers at OMIClear, new transaction and position reports will be generated. Otherwise the draft version will be used;

The files will then be processed and transformed to align with the format accepted by the NCA and finally reported at around 18:00 CET of D+1;

3 Technical details

3.1 Transfer protocols and environments

The SFTP Interface can be accessed through one of the following protocols:

Protocol	Port
SSH FTP (SFTP)	8022
HTTP over TLS	443

The same access credentials are valid across both these protocols. There is no usage limitations currently imposed, however this could change in the future. Please notice that the platform will be constantly monitored to ensure a good quality of service.

OMIP provides a production environment as well as a test environment at the following locations:

Environment	Address	Available
UAT	reporting-test.omip.pt	25 October 2017
Production	reporting.omip.pt	11-15 December 2017

3.2 Folder structure:

Upon login into the Secure FTP interface through one of the protocols above mentioned, the following directory tree will be presented to the user:

- *upload*: directory where the market participant should upload files in either the transaction or the position supported schemas. Files uploaded to this directory will be captured and subsequently deleted from this directory;
- *download/receipts:* directory where technical receipts regarding transaction or position amendments will be provided. Members can request to have the possibility of deleting receipts from this folder for easier management;
- *download/reports/{date:yyyy-mm-dd}:* directory where the draft reports and final reports will be placed. A new directory will be created each market day and should always contain a single transaction report and a single position report;
  - *old:* directory where old versions of the reports will be placed after the amendment is processed;

Reports in the download section will be kept for at least one year after which they will be moved to an archive directory (download/archive).

3.3   File naming and receipts

Draft and final reports will have the following naming pattern:

```
(transaction|position)-report_[member-code]_[report-date:yyyyMMdd]_(rev).xml

            Example: transaction-report_COMA_20171022_2.xml
```

Where *rev* is the revision number of the report (starts at 1).

Amendments must be uploaded with the following naming structure:

```
(transaction|position)-report_[report-date:yyyyMMdd]_[id:{1,50}].xml

            Example: transaction-report_20171022_abc456.xml
```

OMIP will capture the amendment and produce a technical receipt rejecting one or more amendments or accepting all amendments. The receipt will have the following naming structure:

```
OMIPReceipt_[amendment-file-name].xml

Example: OMIPReceipt_transaction-report_20171022_abc456.xml
```

Notice that if you use the same filename more than once, the original receipt will be overridden. To avoid this from happening please use unique identifiers. In case you lose a receipt for this motive please call the support contacts at the end of this document.

Examples of reports, amendments and receipts are provided in the final section of this document.

3.4   Validations done by OMIP

In the table below are the validations done by OMIP on amendment submissions:

Report type	Scope	Description
Both	Global	File does have the correct naming format
Both	Global	Problem parsing the XML file
Both	Global	Schema validation error
Both	Global	One or more records have errors
Both	Global	Report is not open for amendments
Both	Global	Duplicate records detected
Position	Global	Business Date is inconsistent with the file name
Position	Global	Reporting Entity ID does not match the member Legal Entity Id
Position	Global	Only LEI are supported
Transaction	Record	Transaction Id does not match a known Trade Id or UTI
Position	Record	Quantity is not divisible by the product tick volume

Position	Record	ISIN not recognized
Position	Record (ISIN)	Amendment quantities inconsistent with the participant net position quantity
Position	Record (ISIN)	Risk reducing quantity is outside the [short, long] position quantity range

4   Testing plan

In order to assist members in testing the SFTP interface OMIP will set up an initial portfolio of positions for each member and will generate draft position reports each market day at 19:00 CET which can then be amended until 14:00 CET of the following day. Starting November 6th OMIP will also accept requests for new transactions. Overall the tentative timeline for testing with the Secure FTP interface is the following:

- **25 October 2017:** Daily position reports available for download;
- **30 October 2017:** Submission of amendments to positions available;
- **6 November 2017:** New transactions added to the system (per request);
- **20 November 2017:** Transaction reports and submission of amendments to transactions available;

The UAT environment will be available indefinitely. The production environment will be available during the week of 11-15 December. During the communication of the go-live date each member will have the opportunity of setting the Commodities Derivative Indicator flag on existing transactions in order for OMIP to setup the initial positions. More information about this procedure will be disclosed in advance. After the initial setup is concluded, the platform will begin operating as in a go-live setting, without doing the actual reporting to the NCA which will only starts on January 2018.

5   Contacts and Helpdesk

For any questions regarding the OMIP Secure FTP interface for MIFID II/MiFIR reporting, please send an email to the following address:

- mifid@omip.pt

You can also reach us by phone from 9h-18h (CET-1) at:

- (+351) 210006015 – technical questions;
- (+351) 210006018 – any other question;

6 XML Samples

6.1 Transactions report

```xml
<Document xmlns="urn:iso:std:iso:20022:tech:xsd:DRAFT15auth.016.001.01">
    <FinInstrmRptgTxRpt>
        <Tx>
            <New>
                <TxId>OMIP0012017101900000049693</TxId>
                <ExctgPty>529900000000000001234</ExctgPty>
                <InvstmtPtyInd>false</InvstmtPtyInd>
                <SubmitgPty>529900NIA9TL7Q1I4639</SubmitgPty>
                <Buyr>
                    <AcctOwnr>
                        <Id>
                            <LEI>529900000000000001234</LEI>
                        </Id>
                    </AcctOwnr>
                </Buyr>
                <Sellr>
                    <AcctOwnr>
                        <Id>
                            <LEI>5299001PSXO7X2JX4W10</LEI>
                        </Id>
                    </AcctOwnr>
                </Sellr>
                <OrdrTrnsmssn>
                    <TrnsmssnInd>false</TrnsmssnInd>
                </OrdrTrnsmssn>
                <Tx>
                    <TradDt>2017-10-20T12:13:51Z</TradDt>
                    <TradgCpcty>DEAL</TradgCpcty>
                    <Qty>
                        <Unit>10</Unit>
                    </Qty>
                    <Pric>
                        <Pric>
                            <MntryVal>
                                <Amt Ccy="EUR">59.65</Amt>
                            </MntryVal>
                        </Pric>
                    </Pric>
                    <TradVn>OMIP</TradVn>
                </Tx>
                <FinInstrm>
                    <Id>PTFTO0004872</Id>
                </FinInstrm>
                <InvstmtDcsnPrsn>
                    <Prsn>
                        <CtryOfBrnch>PT</CtryOfBrnch>
```
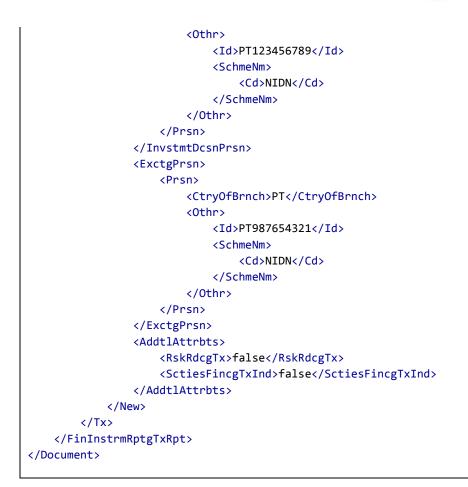
```
                    <Othr>
                        <Id>PT123456789</Id>
                        <SchmeNm>
                            <Cd>NIDN</Cd>
                        </SchmeNm>
                    </Othr>
                </Prsn>
            </InvstmtDcsnPrsn>
            <ExctgPrsn>
                <Prsn>
                    <CtryOfBrnch>PT</CtryOfBrnch>
                    <Othr>
                        <Id>PT987654321</Id>
                        <SchmeNm>
                            <Cd>NIDN</Cd>
                        </SchmeNm>
                    </Othr>
                </Prsn>
            </ExctgPrsn>
            <AddtlAttrbts>
                <RskRdcgTx>false</RskRdcgTx>
                <SctiesFincgTxInd>false</SctiesFincgTxInd>
            </AddtlAttrbts>
        </New>
    </Tx>
    </FinInstrmRptgTxRpt>
</Document>
```

6.2   Transaction amendment

```
<Document xmlns="urn:iso:std:iso:20022:tech:xsd:DRAFT15auth.016.001.01">
    <FinInstrmRptgTxRpt>
        <Tx>
            <New>
                <TxId>OMIP0012017101901900000049693</TxId>
                <AddtlAttrbts>
                    <RskRdcgTx>true</RskRdcgTx>
                </AddtlAttrbts>
            </New>
        </Tx>
    </FinInstrmRptgTxRpt>
</Document>
```

6.3 Transaction amendment receipt

```xml
<TransactionAmendmentReceipt xmlns="http://schemas.omip.pt/2017/MiFIR_MiFIDII/1.0">
    <receiptTimestamp>2017-10-24T10:05:00</receiptTimestamp>
    <reportedFilename>transaction-report_20171023_8640cc8f-633d-4268-a35f-
491bc6f576aa.xml</reportedFilename>
    <reportedFileChecksum>CA9140BEE05997B19170D754B9A1F12A6FF89F44</reportedFileChecksum>
    <status>Accepted</status>
    <revision>2</revision>
    <transactionAmendments>
        <amendment>
            <tradeId>49693</tradeId>
            <uniqueTransactionId>OMIP0012017101900000049693</uniqueTransactionId>
            <status>Accepted</status>
        </amendment>
    </transactionAmendments>
</TransactionAmendmentReceipt>
```

6.4 Positions report

```xml
<Document xmlns="urn:efet:org:xsd:composrpt.002.1.0">
    <FinInstrmRptgTradgComPosRpt>
        <Header>
            <VersionInfo>
                <Version>1.0</Version>
            </VersionInfo>
            <Environment>SIM</Environment>
            <SubmissionID>08d9a4e23b3047828133f88673f871b2</SubmissionID>
        </Header>
        <CPR>
            <NEWT>
                <ReportRefNo>1</ReportRefNo>
                <CPRBody>
                    <RptDt>2017-10-23T18:30:00Z</RptDt>
                    <BusDt>2017-10-23</BusDt>
                    <RptEnt>
                        <LEI>51231234CDE5678QWA12</LEI>
                    </RptEnt>
                    <PstnHldr>
                        <LEI>51231234CDE5678QWA12</LEI>
                    </PstnHldr>
                    <PstinHldrCntctEml>mail@xyz.com</PstinHldrCntctEml>
                    <ParentPstinHldrCntctEml>mail@xyz.com</ParentPstinHldrCntctEml>
                    <PstinHldrIsIdpdtInd>TRUE</PstinHldrIsIdpdtInd>
                    <PrntEnt>
                        <LEI>51231234CDE5678QWA12</LEI>
                    </PrntEnt>
                    <ISIN>PTFTO0004872</ISIN>
                    <VenProdCde>FTB</VenProdCde>
                    <TrdngVenID>OMIP</TrdngVenID>
                    <PstnMtrty>SPOT</PstnMtrty>
                    <PstnQty>3600</PstnQty>
                    <PstnQtyUoM>OTHER</PstnQtyUoM>
                    <PstnQtyUoMDesc>MWh</PstnQtyUoMDesc>
                    <RiskRdcInd>TRUE</RiskRdcInd>
                </CPRBody>
            </NEWT>
        </CPR>
    </FinInstrmRptgTradgComPosRpt>
</Document>
```

6.5 Position amendment

```xml
<Document xmlns="urn:efet:org:xsd:composrpt.002.1.0">
    <FinInstrmRptgTradgComPosRpt>
        <Header>
            <VersionInfo>
                <Version>1.0</Version>
            </VersionInfo>
            <Environment>SIM</Environment>
        </Header>
        <CPR>
            <NEWT>
                <ReportRefNo>1</ReportRefNo>
                <CPRBody>
                    <RptDt>2017-10-24T10:00:00Z</RptDt>
                    <BusDt>2017-12-23</BusDt>
                    <RptEnt>
                        <LEI>51231234CDE5678QWA12</LEI>
                    </RptEnt>
                    <PstnHldr>
                        <LEI>51231234CDE5678QWA12</LEI>
                    </PstnHldr>
                    <PstinHldrCntctEml>mail@xyz.com</PstinHldrCntctEml>
                    <ParentPstinHldrCntctEml>mail@xyz.com</ParentPstinHldrCntctEml>
                    <PstinHldrIsIdpdtInd>TRUE</PstinHldrIsIdpdtInd>
                    <PrntEnt>
                        <LEI>51231234CDE5678QWA12</LEI>
                    </PrntEnt>
                    <ISIN>PTFTO0004872</ISIN>
                    <PstnQty>3600</PstnQty>
                    <RiskRdcInd>TRUE</RiskRdcInd>
                </CPRBody>
            </NEWT>
        </CPR>
    </FinInstrmRptgTradgComPosRpt>
</Document>
```

6.6 Position amendment receipt

```xml
<PositionAmendmentReceipt xmlns="http://schemas.omip.pt/2017/MiFIR_MiFIDII/1.0">
  <receiptTimestamp>2017-10-24T10:05:00Z</receiptTimestamp>
  <reportedFilename>position-report_20171023_8640cc8f-633d-4268-a35f-
491bc6f576aa.xml</reportedFilename>
  <reportedFileChecksum>CA9140BEE05997B19170D754B9A1F12A6FF89F44</reportedFileChecksum>
  <tradingDay>2017-10-23</tradingDay>
  <status>Accepted</status>
  <revision>2</revision>
  <amendmentResults>
    <amendment>
      <isinCode>PTFTO0005051</isinCode>
      <tradingVenueId>OMIP</tradingVenueId>
```

```
        <longQuantity>7200</longQuantity>
        <shortQuantity>-3600</shortQuantity>
        <riskReducingQuantity>3600</riskReducingQuantity>
        <nonRiskReducingQuantity>0</nonRiskReducingQuantity>
        <status>Accepted</status>
    </amendment>
  </amendmentResults>
</PositionAmendmentReceipt>
```