

part of eex group



# MiFID II EUREX Reporting Description

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Leipzig

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## Introduction

### 1.1 Aims of this Document

This document aims at describing the preconditions, steps, and knowledge for the use of the MiFID II EUREX Reporting by EUREX Participants. In this context the following aspects will be presented:

- Preconditions for customers of the **MiFID II EUREX Reporting**
- Possibilities for communication between the **EUREX Participant** and **EEX AG**
- Description of the steps related to the reporting of the **Participant Reports**

**Please note:** EEX AG cannot and does not provide legal advice in the context of these Data Description and any document related hereto. Therefore, all statements or descriptions made in this document shall not be considered as being legal advice. Please be aware, that further regulatory requirements than those outlined in this document, could apply to your firm.

### 1.2 Target Group of this Document

This document is addressed to EUREX Participants that have concluded the MiFID II EUREX Reporting Agreement.

### 1.3 Contact Details and Availability

In case of any questions related to the MiFID II EUREX Reporting, please contact our Reporting Services department with the following contact details:

- Phone: +49 341 2156 380
- E-Mail: [mifid-mifir-reporting@eex.com](mailto:mifid-mifir-reporting@eex.com)

### 1.4 Glossary

Term	Definition
GUI	Graphical User Interface
PKI	Public Key Infrastructure
MIC	Market Identification Code
MiFID II	Markets in Financial Instruments Directive (2014/65/EU)
NCA	National Competent Authority
XML	Extensible Markup Language
XSD	XML Schema Definition

## Preconditions

### 2.1 Provision of Master Data

The Master Data is necessary for the identification and setup of the EUREX Participant's reporting account and its access to EEX AG's SFTP server. The Master Data must be provided to EEX AG's Reporting Services department in the context of the conclusion of the MiFID II EUREX Reporting Agreement via the Participation Form. This includes the public IP address(es) of the EUREX Participant's devices/network to access EEX AG's SFTP server.

### 2.2 Account Set-up & Access

After EEX AG has received a duly filled and signed MiFID II EUREX Reporting Agreement by the EUREX Participant, the following steps apply:

- EEX AG will send out a notification of acceptance by email to the contact person named in the Participation Form.
- The public IP address(es) provided in the Participation Form will be whitelisted. EEX AG will inform the IT representative named in the Participation Form when the whitelisting is completed. **Please note:** The whitelisting process may take up to 20 calendar days.
- The Participant is supposed to create a key pair for all upcoming SFTP access authentications and provide the public key to Reporting Services. EEX AG will then implement the public key and send out the SFTP login credentials to the IT representative named in the Participation Form. The Participant will be prompted to change the password after the first login. Please find further information in chapter **Fehler! Verweisquelle konnte nicht gefunden werden..**

After the necessary preconditions are fulfilled, the MiFID II EUREX Reporting will be activated by EEX AG on the date the EUREX Participant is assigned to the capacity "Commodity MiFID2" at EUREX. Details related to the reporting workflow and further technical details can be found in the following chapters.

## Usual Workflow

- 1 EEX AG:** Provision of **MiFID EUREX Instrument Files** on the SFTP server earliest at 07:05 a.m. CE(S)T
- 2 EUREX Participant:** Upload of a valid **Participant Report** until 02:00 p.m. CE(S)T
- 3 EEX AG:** Submission of the latest valid **Participant Report** to BaFin after 02:00 p.m. CE(S)T

### 3.1 Provision of MiFID EUREX Instrument Files

The MiFID EUREX Instrument File contains a list of all instruments that are subject to reporting obligations for end of day positions on the preceding exchange day (Business Day) under MiFID II Article 58. The file is provided on each Business Day earliest at 07:05 a.m. CE(S)T on the Reporting Services SFTP server in the folder "MIFID\_Instrument\_File\_EUREX\_BACKUP".

The purpose of the MiFID EUREX Instrument File is to share the relevant instrument details to create the **Participant Report**. The file is provided only for EUREX Participants that fulfilled the necessary preconditions, see chapter Account Set-up & Access. Please note that only files of the last 90 calendar days are available on the Reporting Services SFTP server. Files older than 90 calendar days can be provided after a separate request.

Please note that the instrument file is also provided for download at the [webpage](#) of EUREX.

### 3.2 Upload of Participant Reports

EUREX Participants should provide their Participant Report by 02:00 p.m. CE(S)T on the Reporting Services SFTP server. All submitted Participant Reports must be provided as outlined in chapter Format and Schema Details and must include all applicable positions of the respective Business Day.

The Participant Report shall only contain positions that are subject to reporting obligations for end-of-day positions on the preceding exchange day (Business Day). Every Participant Report is validated against the EUREX Instrument File. This validation shall verify that only relevant instruments are reported and that such are reported with the correct attributes. Position records that refer to instruments that are not included in the MiFID EUREX Instrument File will not be considered for the submission to BaFin.

If a EUREX Participant submits several reports for one business day, EEX AG will submit the latest valid report to BaFin. In case of rejections a corrected report is required that must contain the whole set of records. Therefore, the corrected report must not be limited to the rejected position records. In case EUREX Participants provide an invalid report or don't submit a report until 02:00 p.m. CE(S)T, the latest valid Participant Report of the previous Business Day will be submitted. EUREX Participants are still obliged to provide the missing Participant Report. EEX AG will inform the EUREX Participant and request a corrected report in such cases.

The validation status of uploaded Participant Reports is shown in the acknowledgement file that is created instantly after the Participant Report has been processed. For further details please see chapter Acknowledgements Files.

**Please note:** The Participant Report provided under the MiFID II EUREX Reporting Agreement must only contain positions of EUREX. Customers that also use EEX AG's MiFIDII/MiFIR Data Services shall not submit data of EEX in this context but use the dedicated infrastructure.

## SFTP Server

EEX AG provides an SFTP server for the provision of the MiFID EUREX Instrument File and the import of Participant Reports by the EUREX Participant. Please use an FTP client like WinSCP to access the SFTP server. Operating systems other than Windows (e.g. Linux and MacOS) have not been tested and are not supported. Should your infrastructure be built on operating systems other than Windows, we recommend using an emulated Windows version.

Please find the general SFTP connectivity details below.

- **Port:** 22 (sFTP)
- **URL:** rcr.eex.com
- **IP:** 193.29.70.14

### 4.1 Access to the SFTP Server

The authentication to access the SFTP server requires the combination of username, password and private key. Before receiving username and password a pair of private and public key must be created. You should have received documents that guide you through two options on how to create a key pair. The public key must then be sent to [mifid-mifir-reporting@eex.com](mailto:mifid-mifir-reporting@eex.com).

Afterwards, your initial password will be sent to you by email. Please call +49 (0)341 2156 380 to receive your username. Due to our security policy, username and password must be communicated through two different means. When you access the SFTP server for the first time you will be required to change your password, that must cover the following requirements:

- Choose a password of at least 14 characters.
- Include uppercase and lowercase letters as well as numbers.
- Special characters are recommended but not required.

### 4.2 Folder Structure

The 1<sup>st</sup> level of the SFTP server contains five folders. Relevant for MiFID II EUREX Reporting are the folders **MiFID** and **INSTRUMENTFILE**.

1st Level	2nd Level	3rd Level
MIFID	ACKNOWLEDGEMENT	<i>Acknowledgement files as encrypted XML files.</i>
	ARCHIVE	<i>Successfully uploaded XML files from folder MIFID\IN.</i>
	ERROR	<i>Unsuccessfully uploaded XML files from folder MIFID\In.</i>

	IN	<i>Encrypted Participant Reports as XML files supposed to be uploaded.</i>
	OUT	<i>Not relevant</i>
	ORDERREPORT	<i>Not relevant</i>
INSTRUMENTFILE	<i>MiFID EUREX Instrument Files</i>	-
Client_Public_Key*	<i>Public Key for encryption of Participant Reports.</i>	-

\*May not be displayed for every Participant.

All files older than 90 calendar days will be archived. Please contact [mifid-mifir-reporting@eex.com](mailto:mifid-mifir-reporting@eex.com) should you need access to archived files.

### 4.3 Simulation and Test Environment

Since EEX AG does not provide a dedicated simulation environment for test purposes, the reporting system of EEX AG validates the XML element “environment” of position and transaction reports. If the XML element is changed from ‘PRO’ to ‘SIM’, the report will be treated as a test file.

Files with environment ‘SIM’ also trigger the creation of acknowledgement files together with a warning description that informs about the identified test file. Test files are not supposed to be sent to BaFin what is why the submission to the regulator by EEX AG is technically ruled out. Participants must ensure that reports supposed to be submitted to BaFin include the environment ‘PRO’. The upload of files with values other than ‘PRO’ and ‘SIM’ results in failure.

### 4.4 Rejection of Test Files on Production Environment

The reporting system of EEX AG automatically rejects test files. Reports with environment ‘PRO’ and with filenames that include keywords like SIM, TEST, TST, or Simulation are rejected. The keyword identification is not case sensitive.

**Please note:** Reports with environment ‘SIM’ are accepted even if the filename includes the mentioned keywords.

## Format and Schema Details

### 5.1 Position Report Format and Schema

EEX AG uses the position report format as defined in the latest version of the Implementing Technical Standard (ITS 4) of the European Union from 24 March 2022, also referred to as COMMISSION IMPLEMENTING REGULATION (EU) 2022/1300.

The Financial Conduct Authority of Great Britain (FCA) is the only National Competent Authority (NCA) with a published ITS 4 adaptation as XML schema (.xsd) and reporting guideline. EUROPEX announced the publication of an EFET-FIA schema (“Extended FCA Schema”) on 7 November 2017 based on multiple workshops with industry partners. This schema offers full consistency for all attributes included in the FCA schema. Additional attributes were added where required by trading venues or firms for internal processes. On 2 December 2021 an updated XML schema was published with the additional XML element `ObligationToProvideLiquidity`.

EEX AG uses the Extended FCA Schema with some modifications and namespace "urn:efet.org:xsd:composrpt.002.1.0" for the data exchange with Participants. Participant Reports are validated against the XML schema of EEX AG.

### 5.2 Position Report Structure

The XML schema of EEX AG covers a single `FinInstrmRptgTradgComPosRpt` element containing one header element for general report attributes and multiple `CPR` elements for the report data. The `CPR` element must only contain the report status **NEWT** for newly submitted records.

**Please note:** EEX AG does not accept Participant Reports with report status **CANC**. If a EUREX Participant corrects a formerly sent Participant Report, the previous Participant Report must not be amended or cancelled. EEX AG only accepts a new and complete Participant Report with report status **NEWT** that will replace the formerly sent Participant Report of the respective business day. Please be aware that the report type ‘AMND’ will be corrected automatically to ‘NEWT’ by the reporting system of EEX AG once position records with that report type are uploaded. Records with report type ‘CANC’ will be rejected automatically.

### 5.3 File Naming Convention

File naming convention for **MiFID EUREX Instrument Files**:

**Pattern:** com\_instruments\_<GenerationDate>.csv

**Sample:** com\_instruments\_20220401.csv

File naming convention for **Participant Reports**:

**Pattern:** PRO\_<LEI>\_NCADE\_<GenerationTimestamp>.xml.enc

**Sample:** PRO\_529900J0JGLSFDWNFC20\_NCADE\_20220302T120020734.xml.enc

**Please note:** In case a Participant intends to upload more than one report for the same business day due to corrections the file names must differ. In case the file name of further Participant Reports for the same day is maintained, the acknowledgement file of previous reports is going to be overwritten.

The file naming convention for **acknowledgement files** is based on the file name of the corresponding Participant Report:

**Pattern:** PRO\_<LEI>\_NCADE\_<GenerationTimestamp>\_ACK.xml.enc

**Sample:** PRO\_529900J0JGLSFDWNFC20\_NCADE\_20220302T120020734\_ACK.xml.enc

GenerationTimestamp format: YYYYMMDDT000000000

GenerationDate format: YYYYMMDD

## 5.4 Report Reference Number

The report reference number of each record of the respective Participant Report must be unique to avoid duplicates and tolerates a maximum length of 52 characters.

## 5.5 Liquidity Provision Indicator

BaFin requires the attribute in the daily position reports since reporting day 08.10.2025. The first reported trading day with this attribute is 07.10.2025. The XML element is `ObligationToProvideLiquidity` and only supports the values 'TRUE' and 'FALSE'.

The attribute is used to indicate whether a position is determined for liquidity provision. Positions with an affirmative indicator of Participants that filed a request to the national competent authorities for being treated as liquidity provider will be excluded for the evaluation of position limit breaches.

The definition of liquidity provision is stated in Directive 2014/65/EU ("MiFID II"), Article 2, paragraph 4, (c). This covers cases where the position holder enters positions due to a regulatory or contractual obligation to provide liquidity.

For positions of trading days before 07.10.2025 BaFin requires the attribute to be populated with 'FALSE'. In case the indicator is uploaded by Participants with 'TRUE' for trading days before that date, EEX AG will correct the value to 'FALSE'.

**Please note:** If an uploaded position record does not feature the new XML element, the report will be rejected.

## 5.6 Auto Correction

The following attributes are automatically corrected if the value differs from the one featured in the MiFID EUREX Instrument File.

- VenueProductCode
- TradingVenueIdentifier
- PositionType
- PositionQuantityUnitOfMeasure
- PositionQuantityUnitOfMeasureDescription
- PositionMaturity

## Acknowledgements Files

Once a Participant Report has been uploaded to the SFTP server, a content validation of every record is executed. The following pages list existing error codes and consequent actions if they occur.

**Please note:** An uploaded Participant Report is rejected if it contains erroneous records. As a result, the whole file must be corrected and reuploaded.

### 6.1 Validation Results

Every acknowledgement file begins with a summary of the validation results. Each record will be classified as valid, warning, missing or rejected record. Please find an example below:

```
<TotalRecords>100</TotalRecords>
<ValidRecords>90</ValidRecords>
<WarningRecords>9</WarningRecords>
<MissingRecords>0</MissingRecords>
<RejectedRecords>1</RejectedRecords>
```

The element “MissingRecords” does not apply for EUREX Participant Reports.

After this summary of validation results, each record that was classified as warning or rejected is featured separately with a description of the respective issue.

### 6.2 Attribute Details

The following attributes are covered in the header section of each acknowledgement file. Regardless of the validation status these attributes are always displayed.

Field Name	Description
<b>Environment</b>	Identifier of the reporting environment. Usually PRO for production.
<b>Timestamp</b>	Date and time at which the response file was created.
<b>SubmitterID</b>	Indicates the LEI of the response provider (EEX AG).
<b>CustomerID</b>	Indicates the LEI of the response receiver (Participant).
<b>InboundFileReference</b>	Identifier of the inbound file the response was created for.
<b>UltimateReceivingNCA</b>	Identifier of the receiving authority. Usually, NCADE for BaFin.
<b>FileType</b>	Indicates the report type Position.
<b>ValidationResult</b>	Indicates the validation result for the uploaded file, either accepted or rejected. In case of warnings or errors further details are provided.
<b>AcknowledgmentStatus</b>	Indicates the status of the acknowledgement, either accepted or rejected.
<b>TotalRecords</b>	Indicates the total number of records within the uploaded file.
<b>ValidRecords</b>	Indicates the number of valid records.

<b>WarningRecords</b>	Indicates the number of records with status warning. Records with status warning are still valid but differ from the MiFID EUREX instrument file. Such differences are corrected automatically without further actions required.
<b>MissingRecords</b>	Indicates the number of position records with an instrument ISIN that is featured in the draft position report but missing in the Participant Report. Draft positions with quantity zero do not apply. The attribute does not apply for EUREX Participant Reports.
<b>RejectedRecords</b>	Indicates the number of rejected records.

The following attributes are only displayed in case of records with status warning or error. Each record is displayed separately below the header section with the defined set of attributes below.

Field Name	Description
<b>ReportRefNo</b>	Indicates the reference id of the record.
<b>BusDt</b>	Indicates the reported business day of the record.
<b>TrdngVenID</b>	Indicates the MIC of the record.
<b>RecordNumber</b>	Indicates the dataset number of the record.
<b>Sequence</b>	In case there are multiple errors and/or warnings for the same record identified by the same report reference number the sequence number is counted upwards. The start value is 0.
<b>FieldID</b>	Indicates the field ID the warning or error is related to. Please see chapter Field IDs for further details.
<b>FieldName</b>	Indicates the field name the warning or error is related to. Please see chapter Field IDs for further details.
<b>Severity</b>	Indicates the severity, either error or warning.
<b>ErrorCode</b>	Indicates the error code of the record. Please see chapter Error Codes for more details.
<b>ErrorDescription</b>	Provides details of the warning or error message.

### 6.3 Error Codes

Once a Participant Report has been uploaded to the SFTP server, a content validation of every record is executed. The following table lists existing error codes and consequent actions if they occur.

**Please note:** An uploaded file is rejected if it contains erroneous records. As a result, the whole file must be corrected and reuploaded again including all records.

Error Code	Error description	Required action
<b>E001</b>	The specified LEI code is not valid according to gleif.org.	Please ensure to populate LEI codes that are valid and active according to the gleif.org. Only LEI codes with entity status "active" are accepted.

<b>E002</b>	The specified instrument is not a reportable instrument on the respective business day.	Please ensure that the specified instrument is reportable on the respective business day and included in the MiFID Instrument File. The specified ISIN must be an instrument ISIN, not a product ISIN.
<b>E003</b>	The specified report or trade reference number is not unique and has been used multiple times within the uploaded file.	Please ensure that the uploaded file does not contain duplicate report reference numbers or trade reference numbers. This may be avoided by amending the participant component 0000 of the reference number.
<b>E004</b>	The country code of the specified National ID is not valid according to ISO 3166.	Please ensure that the specified National ID starts with a valid 2-digit country code according to ISO 3166.
<b>E006</b>	The uploaded file contained too many elements.	Please ensure that the file is properly created and contains only records of one business day.
<b>E007</b>	The specified date has an invalid format.	Please specify a valid date.
<b>E008</b>	The specified text is longer than allowed.	Please specify a value with less than 255 digits.

## 6.4 Warning Codes

Once a Participant Report has been uploaded to the SFTP server, a content validation of every record is executed. The following table lists existing warning codes.

**Please note:** An uploaded file is not rejected, if validated records only cause warning codes. The Participant Report will still be considered for submission to BaFin.

Warning Code	Warning description	Required action
<b>W002</b>	Instrument attributes do not match with the instrument file.	No further action required. The incorrect value will be corrected automatically if the instrument ISIN is part of the MiFID EUREX instrument file.

## 6.5 Technical Validation

Once a Participant Report has been uploaded to the SFTP server, a technical validation of the file is executed.

**Please note:** The technical validation is executed at file level and not at record level, hence there are no explicit error codes available. The error reason is included within the validation result. In addition, if one of the errors below occur, the submitted file will be rejected.

Error Reason	Error Description	Required Action
XML validation of file <FilenameWithPath> failed: [...]	The uploaded file is not valid according to the XSD schema.	Please ensure that the submitted file contains only values and elements according to the XSD schema.
Report contains items for multiple business days: <ListOfBusinessDaysinXMLFile>	The submitted file contains data for more than one business day.	Please ensure that the Participant Report contains only records of one business day.
NCA in header <NCAName> is different from NCA <NCAFromInstrument> of instrument <ISIN>	The identified position element refers to an instrument that must not be reported to the specified authority.	Please ensure that an uploaded file contains only reportable data for the NCA that was specified in the field UltimateReceivingNCA.

## 6.6 Field IDs

The following table lists the field ids and related error codes in correspondence with the position attributes. Those field ids are defined by EEX AG to support Participants with the correction of errors.

Field Name	Schema Path	Field ID	Error Code
Report reference number	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/ReportRefNo	RD001	E003
Date and time of report submission	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/RptDt	RD006	E007
Date of the trading day of the reported position	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/BusDt	RD007	E007
Reporting entity ID	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/RptEnt/LEI	PA002	E001
Position holder ID	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/PstnHldr/LEI	PH001	E001 E004
	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/PstnHldr/NationalID/Othr/Id	PH001	
	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/PstnHldr/NationalID/Othr/Sc hmeNm/Cd	PH001	
	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/PstnHldr/NationalID/Othr/Sc hmeNm/Prtry	PH001	
Email address of position holder	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/PstinHldrCntctEml	PH002	E008

Category of position holder	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/PstinHldrCategory	PH004	n/a
Ultimate parent entity ID	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/PrntEnt/LEI	PH005	E001 E004
	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/PrntEnt/NationalID/Othr/Id	PH005	
	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/RptEnt/NationalID/Othr/SchmeNm/Code/	PH005	
	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/RptEnt/NationalID/Othr/SchmeNm/Prtry/	PH005	
Email address of ultimate parent entity	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/ParentPstinHldrCntctEml	PH006	E008
Identification code of contract traded on trading venues	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/ISIN	RD003	E002
Venue product code	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/VenProdCde	RD004	W002
Trading venue identifier	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/TrdngVenID	RD005	W002
Position type	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/PstnTyp	PD001	W002
Position maturity	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/PstnMtrty	PD002	W002
Position quantity	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/PstnQty	PD003	W002
Notation of the position quantity	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/PstnQtyUoM	PD004	W002
Notation of the position quantity (description)	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/PstnQtyUoMDesc	PD007	W002
Delta equivalent position quantity	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/DeltaPstnQty	PD005	W002

## References

### 7.1 European Commission

#### **DIRECTIVE 2014/65/EU (“MiFID II”)**

<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32014L0065>

#### **COMMISSION IMPLEMENTING REGULATION (EU) 2022/1300 of 24 March 2022 (ITS 4)**

<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32022R1300>

#### **REGULATON 600/2014/EU (“MiFIR”)**

<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32014R0600>

#### **COMMISSION DELEGATED REGULATION (EU) 2017/590 of 28 July 2016 (RTS 22)**

<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017R0590>

### 7.2 EUREX

#### **MiFID2 Commodity Derivatives Instruments**

<https://www.eurex.com/ex-en/data/trading-files/com-instruments>

#### **Account Structure**

<https://www.eurex.com/ex-en/trade/order-book-trading/account-structure>

#### **MiFID II/MiFIR – Impact on the derivatives market**

<https://www.eurex.com/ex-en/rules-regs/mifid-mifir>

### 7.3 FCA

#### **Schema Tag of ITS 4**

<https://www.fca.org.uk/publication/systems-information/commodity-derivative-position-reports.xsd>