

Instruction I-GEN-03/2025

Notification of Transactions to a Trade Repository to
comply with EMIR obligations.

Harmonised EMIR Refit files

BME CLEARING

General Instruction

Effective Date: 30 June 2025

Replaces: I-GEN-04/2024

This Instruction details the fields, nomenclature, structure and generation of the harmonized files.

It is modified due to the update of the harmonised file CCPPOSITIONEMIR to version 4.0

As described in section 9 of Circular '*Notification of Transactions to a Trade Repository to comply with EMIR obligations. Adaptation to EMIR Refit*' or the one that replaces it, according to the agreement reached by the members of the EACH Group, BME CLEARING will update the harmonised CCPPOSITIONEMIR file to version 4.0

In addition, BME CLEARING generates 3 harmonized files:

- CCPTRADESEMIR, at trade level
- CCPVALUATIONEMIR, with valuation data, and
- CCPCOLLATERALEMIR, with collateral data.

The information shown in all these files always reflects the CCP's viewpoint.

1. NOMENCLATURE

The name of the harmonised files shall be composed of:

File_EEE_00X_zzzz_MMMMCC_YYYYMMDD_vvv.csv

Where:

- File:
Available values are CCPTRADESMIR, CCPPOSITIONEMIR, CCPVALUATIONEMIR or CCPCOLLATERALEMIR
- EEE = Environment code
PRD Production
SIM Testing environment

- 00X = Current file version.

Being 004 the new version of the harmonised CCPPOSITIONEMIR file. In case of futures releases, this number will be consecutive and always agreed within the EACH Group.

For the rest of the harmonised files, it will start with version 001. For future versions this number will be consecutive.

- zzzz = BME CLEARING's MIC code

BMCL

- MMMM = Member code

When a CM has different member codes depending on the segment to which it belongs, the member code will prevail according to the following order: 1st, the member code of C2: Financial Derivatives; 2nd, that of C9: Swaps; 3rd, that of C7: Energy Segment; 4th, that of CD: FX and lastly, that of CC: Digital Assets Derivatives.

- CC = CCP code

CM

- YYYYMMDD = File date
- vvv = File version number, starting at **001**.

This suffix is used if the harmonized file needs to be generated again. For example, for corrections to the content of the file after the initial generation, the second report generated would end in 002.

2. GENERATION

The time of generation is 04:30 am on T+1, where T is the date of the session to be reported.

In case of errors or omissions in any data in the report, these shall be reported, but using the symbol '?' as a mask.

The errors or omissions of data reported in the version vvv = **001**, will be corrected in a second sending of the file from 09:00 hours on T+1, once the response from the TR to which BME CLEARING reports its positions has been received, with vvv taking the value **002**.

3. DESCRIPTION

3.1 Harmonised CCPTRADESEMIR file

Emir Refit Table & Item	CCPTRADESEMIR
2_1_	UTI
2_2_	Report tracking number
2_3_	Prior UTI
2_4_	Subsequent position UTI
2_5_	PTRR_ID
2_7_	ISIN
2_8_	Unique product identifier (UPI)
2_9_	Product classification
2_11_	Asset class
2_16_	Name of the underlying index
2_32_	Clearing timestamp
2_33_	Central counterparty
2_37_	Intragroup
2_41_	Venue of execution
2_42_	Execution timestamp
2_43_	Effective date
2_44_	Expiration date
2_47_	Delivery type
2_48_	Price
2_49_	Price currency
2_55_	Notional amount of leg 1
2_56_	Notional currency 1
2_60_	Total notional quantity of leg 1
2_83_	Identifier of the floating rate of leg 1
2_99_	Identifier of the floating rate of leg 2
2_113_	Exchange rate 1
2_115_	Exchange rate basis
2_116_	Base product
2_117_	Sub-product
2_118_	Further sub-product
2_121_	Load type
2_122_	Delivery interval start time
2_123_	Delivery interval end time
2_124_	Delivery start date

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Emir Refit Table & Item	CCPTRADESEMIR
2_125_	Delivery end date
2_126_	Duration
2_132_	Option type
2_133_	Option style
2_134_	Strike price
2_139_	Option premium amount
2_140_	Option premium currency
2_141_	Option premium payment date
2_151_	Action type
2_152_	Event type
2_153_	Event date
2_154_	Level

3.2 Harmonised CCPPOSITIONEMIR file ¹

EMIR Refit Table & Item	CCPPOSITIONEMIR	Format	Accepted content
	C.O.B Date	YYYY-MM-DD	
1_4_	Counterparty 1 (Reporting counterparty)	LEI (ISO 17442)	
1_17_	Direction		SLLR, BYER
2_21_	Valuation amount	Numeric	
2_22_	Valuation currency	Currency (ISO 4217)	
2_5_	Product identification type		
2_7_	ISIN	ISIN (ISO 6166)	
2_1_	UTI	UTI (ISO 23897)	
2_41_	Venue of execution	MIC (ISO 10383)	
2_48_	Price	Numeric	
2_60_	Total notional quantity of leg 1	Numeric	
2_132_	Option type		CALL, PUTO, OTHR
2_134_	Strike price	Numeric	
2_154_	Level		PSTN
-	Clearing Member Code	Alphanumeric	

¹ Single file agreed within EACH.

The purpose of this file is to compile all open positions communicated to a Repository, regardless of whether they have been created (NEWT), modified (MODI), or if only their valuation has changed (VALU) during the session.

EMIR Refit Table & Item	CCPPOSITIONEMIR	Format	Accepted content
-	Trading_Member_Code	Alphanumeric	
-	Exchange_Account_Code	Alphanumeric	
-	Position_Account_Owners	Alphanumeric	
-	Exchange_Product_Code	Alphanumeric	
2_44_	Expiration date	YYYY-MM-DD	
2_3_	Prior UTI	UTI (ISO 23897)	
2_14_	Underlying identification	ISIN (ISO 6166)	
2_25_	Delta	Numeric	
2_42_	Execution timestamp	YYYY-MM-DDThh:mm:ssZ (ISO 8601)	
2_48_	Price Notation		MntryVal = monetary value Pctg = percentage
2_55_	Notional amount of leg 1	Numeric	
2_56_	Notional currency 1	Currency (ISO 4217)	
2_46	Final contractual settlement date	YYYY-MM-DD	
2_151	Action type		NEWT, MODI, CORR, TERM, EROR, REVI, VALU
2_152	Event type		NOVA, ETRM, EXER, CREV, INCP, TRAD, COMP, CORP, UPDT

3.3 Harmonised CCPVALUATIONEMIR file

Emir Refit Table & Item	CCPVALUATIONEMIR
1_1_	Reporting timestamp
2_21_	Valuation amount
2_22_	Valuation currency
2_23_	Valuation timestamp
2_24_	Valuation method
2_25_	Delta
2_1_	UTI

3.4 Harmonised CCPCOLLATERALEMIR file

Emir Refit Table & Item	CCPCOLLATERALEMIR
3_1_	Reporting timestamp
3_2_	Report submitting entity ID
3_4_	Counterparty 1 (Reporting counterparty)
3_6_	Counterparty 2
3_7_	Collateral timestamp
3_8_	Collateral portfolio indicator
3_9_	Collateral portfolio code
3_11_	Collateralisation category
3_12_	Initial margin posted by the counterparty 1 (pre-haircut)
3_13_	Initial margin posted by the counterparty 1 (post-haircut)
3_14_	Currency of the initial margin posted
3_15_	Variation margin posted by the counterparty 1 (pre-haircut)
3_16_	Variation margin posted by the counterparty 1 (post-haircut)
3_17_	Currency of the variation margins posted
3_18_	Excess collateral posted by the counterparty 1
3_20_	Initial margin collected by the counterparty 1 (pre-haircut)
3_21_	Initial margin collected by the counterparty 1 (post-haircut)
3_22_	Currency of initial margin collected
3_23_	Variation margin collected by the counterparty 1 (pre-haircut)
3_24_	Variation margin collected by the counterparty 1 (post-haircut)
3_25_	Currency of variation margin collected
3_26_	Excess collateral collected by the counterparty 1
3_27_	Currency of excess collateral collected

4. CONSIDERATIONS AND DISTRIBUTION

Some important considerations are:

- Its format shall be .csv
- A single file will be generated for each Clearing Member, regardless the segments to which it belongs.
- In the absence of information to display for a specific day, due to member inactivity, the harmonized files will be generated empty, although they will include the header and the footer, with the latter having a value = “NOL;0”.

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The harmonized files will be distributed via sftp, taking advantage of any connections the member may have for the Financial Derivatives (C2), Energy (C7) or Swap (C9) Segments.

For those members with a reporting obligation who do not have any connection to one of the aforementioned segments, may use the sftp already configured for other segments; Equities (C0) or Fixed Income (C8). Otherwise, a new sftp connection will need to be configured.

The file will be distributed encrypted, with the same encryption keys that the Member currently has on the sftp being used in each case. For new sftp connections, the Member will have to provide such encryption key.

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