Transaction Reporting pursuant to Article 26 MiFIR

Interface Description

Contents

1 GENERAL

This interface description serves as a guideline for the technical connection to the FMA's incoming notification system and is aimed at all institutions intending to submit transaction reports in relation to securities pursuant to Article 26 MiFIR or instrument reference data pursuant to Art. 27 MiFIR to the Austrian Financial Market Authority (FMA).

Updates that are made to this documentation can be recognised on the basis of the version number stated on the title page.

Changes to the previous version are highlighted in grey.

1.1 Scope of the Document

This document contains a technical description about how MiFIR Securities Transaction Reports or MiFIR instrument reference data shall be submitted to the using the Version 2.1 of the service "eXite", provided by the firm Editel.

The data transfer format prescribed by ESMA (the description of the XML data file, i.e. the XSD (XML Schema Definition) does not form part of this document (please see the further links in Chapter 2.8).

This document only describes the form in which the XML data file must be submitted to the service "eXite".

1.2 Electronic Data Interchange service (eXite)

The FMA's securities transaction reporting system uses EDITEL's EDI (Electronic Data Interchange) Platform eXite® (https://www.editel.eu/solutions/edi-communication/), which is operated through the Business Contact Service with IBM as technology partner.

Editel ensures a failure-safe infrastructure housed in several high security data centres with the full recording of all transactions, accesses and other activities, thereby providing the highest level of security and traceability of the exchange of data.

To be able to submit data to the eXite® Business Integration Network, you will require communications software through which data can be submitted to a participant or can be fetched from a participant.

The FMA uses the eXite®_link communications software, which has been developed especially for this purpose to enable to efficient and cost-effective communication with the eXite® Business Integration Network. Detailed information about this software can be found at www.editel.at.

As Editel has provided an Interface Description for submitting data to the "eXite" there is also the option to implement proprietary communications software for submitting / receiving data.

2 REPORTS

2.1 Pre-requisites for reporting

In order to submit MiFIR reports to the FMA, the following steps must be implemented. The chapters that follow, Chapters 2.1.1 to 2.1.3., refer to steps for systems provided by external firms that are not services by the FMA. In this case, the FMA cannot be considered to be the point of contact or the contact person.

Further it is necessary, that investment firms and trading venues having a reporting obligation register with the FMA Online Registration-Tool (ORT) under https://webhost.fma.gv.at/TRSYS. ARM's are not expected to register with ORT. Firms need to populate the so called "EDI address" of the reporting and submitting firm, which will then be granted permission to submit transaction reports to the FMA internal system. Without that registration firms will not be able to successfully submit transaction reports to the FMA internal systems, and files will be rejected.

2.1.1 Access to the Electronic Data Interchange service

Any company that already submitted securities transaction reports to the FMA before 3 January 2018, should already have the relevant access and a corresponding mailbox for receiving and sending data. In this case, no new access is required and the already existing access can continue to be used as they have been to date. But there is still a need to register with ORT and populate the submitting entity as prescribed under 2.1 or 2.1.4. In the event that you have not previously made reports to the FMA by yourself, then you will be able to request the EDI addresses from the institution that has made the reports on your behalf.

In the event that you require a new access, please contact IBM Austria or the company Editel (https://www.editel.at) directly.

2.1.2 Installing the Communications Software

Companies that already submitted securities transaction reports to the FMA before 3 January 2018, should already have the relevant communications software installed. In the event that you require communications software, please contact, for example, the company Avedium Technologie GmbH (http://www.avedium.com). Any other suitable alternative software solution may also be used.

2.1.3 Configuring the communications software

MiFIR Transaction Reports must be submitted in the XML file format. Consequently the communications software must be configured accordingly.

In the case of the eXite®_link communications software, a new connection profile must be set up to allow data to be sent and received in XML format.

The same mailbox can be used to send and receive data in XML format as was used for the old EDI Fact format. The relevant messages will be fetched depending on the connection profile.

For questions about the configuration of the communications software, please contact http://www.avedium.com (if you use Avedium).

2.1.4 Declaration of Authorisation to Report

In the previously used securities transaction reporting system, the FMA's reporting system checked whether the "Bankleitzahl" (Austrian equivalent of a bank sorting code) or the SWIFT code (BIC) was authorised in conjunction with the sender's EDI address, to submit data to the FMA's IBM mailbox.

In the new system, the LEI (Legal Entity Identifier) in conjunction with the EDI address within ORT is the sole means of verification of being authorised to submit reports.

All institutions under reporting obligations, which also include the operators of trading venues pursuant to Article 26(7) MiFIR, are therefore required to inform the FMA about which LEI and using which EDI address they will submit data to the FMA's mailbox. Please be aware that EDI addresses will only be accepted with capital letters and should therefore also be assigned so. This also affects institutions, which existed before 3 January 2018, that are subject to reporting obligations. They are also required to re-register with the FMA.

For this purpose, the FMA provides the institutions under reporting obligations with a web-based application, through which the necessary registration of the authorisation to report must be carried out.

Link for the Online-Registration-Tool: https://webhost.fma.gv.at/TRSYS

Please find the instruction manual under: https://www.fma.gv.at/download.php?d=2943 and a template for a power of representation under: https://www.fma.gv.at/download.php?d=2944.

2.1.5 Enveloping process

As reports are submitted to the FMA in XML format, the reports must be enveloped accordingly in order to be correctly routed to the FMA Mailbox (see also 2.2 Enveloping of reports).

2.1.6 Encryption of data

The actual securities transaction reports are encrypted within the XML envelope and submitted as a Base64 encoded XML element.

GNU-PGP is used for encrypting the data. The public key can be found and downloaded under https://webhost.fma.gv.at/TRSYS/Verschluesselung.

Encryption ensures that the external administrators within the BUSCON services are not able to read the transaction reports, which contain even more detailed information about the bank's customers now.

Feedback messages from the FMA are sent to the institution under reporting obligations in unencrypted form to the relevant mailbox, as they do not contain any sensitive data.

2.2 Enveloping of the report

Institutions under MiFIR reporting obligations shall make submissions in the following format:

```
<?xml version="1.0" encoding="utf-8" standalone="yes"?>


<!-- Data were submitted as standard business document -->
<sh:StandardBusinessDocument
xmlns:sh="http://www.unece.org/cefact/namespaces/StandardBusinessDocumentHe
ader">
    <sh:StandardBusinessDocumentHeader>
        <sh:HeaderVersion>1.0</sh:HeaderVersion>
        <sh:Sender>
            <!--
                EDI address of the submitter (submitting firm)
                Enter your EDI Address here, to be able to submit data
            -->
            <sh:Identifier>ATBWATEST</sh:Identifier>
        </sh:Sender>
        <sh:Receiver>
            <!--
                EDI Address of the RECEIVER
                For TEST reports enter the EDI Address ATBWATEST (the
                FMA's EDI Address for test reports). For reports to the
                productive system enter the EDI Address ATBWA (the FMA's
                EDI Address for productive reports).
            -->
            <sh:Identifier>ATBWATEST</sh:Identifier>
        </sh:Receiver>

        <sh:DocumentIdentification>
            <sh:Standard>EAN.UCC</sh:Standard>
            <sh:TypeVersion>2.5</sh:TypeVersion>
            <!--
                Instance identifier number
                A single (unique) incrementing number is used for each
                submission. This number is used as a reference in the
```

```
                    FMA's feedback files to the corresponding institution
                    under reporting obligations.
                -->
                <sh:InstanceIdentifier>1</sh:InstanceIdentifier>
                <!--
                    Message Type
                    For test reports always MIFIRTEST
                    For productive reports always MIFIRPROD
                -->
                <sh:Type>MIFIRTEST</sh:Type>
                <sh:CreationDateAndTime>
                    2016-10-31T14:05:38+01:00
                </sh:CreationDateAndTime>
            </sh:DocumentIdentification>
        </sh:StandardBusinessDocumentHeader>


    <!--
      CONTENT of the FILE (Payload Section)
    -->

    <datatrans:content
            xmlns:eXite_link="http://www.editel.at/xml/eXite_link/message/"
            xmlns:datatrans="http://mifirtrans.fma.gv.at"
              eXite_link:encoding="utf-8"
              eXite_link:standalone="yes"
              eXite_link:xmlversion="1.0"
            <!--
                    corresponds to the sender's EDI address in the header
            -->
              datatrans:Sender="ATBWATEST"
              <!--
                    corresponds to the receiver's EDI address in the header
            -->
              datatrans:Receiver="ATBWATEST"
              <!--
                    corresponds to the instance identifier number in the
header
            -->
              datatrans:InstanceIdentifier="1"
              <!--
                    corresponds to the message type in the header
            -->
              datatrans:Type="MIFIRTEST"
              <!--
                    corresponds to the CreationDateAndTime in the header
            -->
              datatrans:CreationDateAndTime="2016-10-31T14:05:39+01:00">

        <!--
            XML file in accordance with ESMA standards, encrypted using GNU
            PGP and BASE64 encoded.
            In the following element, the XML file generated in according
            with ESMA standards containing all transactions of all
            institutions under reporting obligations (executing firms), for
            which the submitting firm is authorised to submit data. The
            "submitting firm" may also be an "executing firm".
```

```
        The document to be transmitted is submitted, having been
        encrypted using GNU PGP using the public key supplied by the
        FMA, and encoded using base64 as content of the element
        datatrans:TransReportsXMLFile.

        The element may only occur once (i.e. a submitted file contains
        transaction reports from exactly one submitting firm; within
        the file transactions may be submitted for all executing
        firms).

        The submitting firm (LEIOFSUBMITTINGFIRM) must be authorised by
        the FMA to send reports to the FMA EDI ADDRESS.
   -->
  <datatrans:TransReportsXMLFile
     <!--
            LEIOFSUBMITTINGFIRM
            Identification key of the submitting firm.
            Must contain a valid LEI.
            Must be authorised to send notifications to the FMA's EDI
            Address.
     -->
     datatrans:repFirmIdent="LEIOFSUBMITTINGFIRM">
       <!—
            DATA FILE
            base64 encoded, previously encrypted using GNU PGP XML
            file with Transaction Reports of all institutions under
            reporting obligations (Executing Firms), for which the
            Submitting Firm is authorised to send data.
            This file will be checked against the XSD scheme
            prescribed by ESMA and the additional checking rules
            listed in the specifications.
       -->
       AANDGGDHSKKLKSKKLKLKLJKLKJKLJLKMMIILJSLKLMSMKLMKL
   </datatrans:TransReportsXMLFile>

</datatrans:content>

</sh:StandardBusinessDocument>
```

Institutions under reporting obligations will receive a feedback file from the FMA, which is sent to the sender's EDI address. Unlike the previous reporting regime, there is now both positive and negative feedback. In addition there is also feedback about reports, which have not yet been able to be validated and are therefore "pending". Feedback files are not encrypted, since they do not contain any sensitive information.

Feedback files have the following format:

```
<?xml version="1.0" encoding="utf-8" standalone="yes"?>

<!-- Data were submitted as standard business document -->
<sh:StandardBusinessDocument
xmlns:sh="http://www.unece.org/cefact/namespaces/StandardBusinessDocumentHe
ader">
    <sh:StandardBusinessDocumentHeader>
```

```xml
        <sh:HeaderVersion>1.0</sh:HeaderVersion>
        <sh:Sender>
            <!--
                EDI Address of the Submitter
                    For TEST reports
                    ATBWATEST (the FMA's EDI Address for test reports)
                    For productive reports
                    ATBWA (the FMA's EDI Address for productive reports)
            -->
            <sh:Identifier>ATBWATEST</sh:Identifier>
        </sh:Sender>
        <sh:Receiver>
            <!--
            EDI Address of the RECEIVER
                    EDI address of the sender (submitting firm) of the
                    submitted file, to which the feedback file refers.
            -->
            <sh:Identifier>EDIRECEIVER</sh:Identifier>
        </sh:Receiver>

        <sh:DocumentIdentification>
            <sh:Standard>EAN.UCC</sh:Standard>
            <sh:TypeVersion>2.5</sh:TypeVersion>
            <!--
                Instance identifier number
                The instance identifier, as stated by the submitting firm
                in the file that was sent.
             -->
            <sh:InstanceIdentifier>1</sh:InstanceIdentifier>
            <!--
                Message Type
                For test reports always MIFIRTEST
                For productive reports always MIFIRPROD
            -->
            <sh:Type>MIFIRTEST</sh:Type>
            <sh:CreationDateAndTime>
                2016-10-31T14:05:38+01:00
            </sh:CreationDateAndTime>
        </sh:DocumentIdentification>
    </sh:StandardBusinessDocumentHeader>

<!--

  CONTENT of the Feedback (ESMA feedback)
-->
<BizData xmlns:xsd="http://www.w3.org/2001/XMLSchema"
         xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
         xmlns="urn:iso:std:iso:20022:tech:xsd:head.003.001.01">
  <!--
  Content of the feedback (Header Section – ESMA Feedback)
  -->
  <Hdr>
    <AppHdr xmlns="urn:iso:std:iso:20022:tech:xsd:head.001.001.01">
      <!--
        Sender information of the feedback
      -->
      <Fr>
```

```xml
<OrgId>
  <Id>
    <OrgId>
      <Othr>
        <!--
        Corresponds to the ISO-code for Austria
        -->
        <Id>AT</Id>
        <SchmeNm>
          <!--
            Code for the type –
        for the sender it is always Authority Code
          -->
          <Prtry>Authority code</Prtry>
        </SchmeNm>
      </Othr>
    </OrgId>
  </Id>
</OrgId>
</Fr>
<!--
  Information of the receiver of the feedback
 -->
<To>
  <OrgId>
    <Id>
      <OrgId>
        <Othr>
          <!--
            Identification of the receiver via
            LEIOFSUBMITTINGFIRM according to the original report
            or
            EDI address of the sender in the header of the
original report
          -->
          <Id>id</Id>
          <SchmeNm>
            <!--
              identifier – either LEI or National Code
            -->
            <Prtry>National code</Prtry>
          </SchmeNm>
        </Othr>
      </OrgId>
    </Id>
  </OrgId>
</To>
<!--
  Corresponds to the instance identifier in the header
 -->
<BizMsgIdr>1</BizMsgIdr>
<MsgDefIdr>auth.031.001.01</MsgDefIdr>
<CreDt>2016-10-31T14:05:38Z</CreDt>
<!--
  Refers to the original report, to which the feedback is sent
for
 -->
```

```
<Rltd>
  <!--
      Information on the sender of the original report
   -->
  <Fr>
    <OrgId>
      <Id>
        <OrgId>
          <Othr>
            <!--
                Identification of the receiver via
      EDI address of the sender in the header of the original report
              -->
            <Id>id</Id>
            <SchmeNm>
              <!--
                  identifier – either LEI or National Code
               -->
              <Prtry>National code</Prtry>
            </SchmeNm>
          </Othr>
        </OrgId>
      </Id>
    </OrgId>
  </Fr>
  <!--
      Information on the receiver of the original report
   -->
  <To>
    <OrgId>
      <Id>
        <OrgId>
          <Othr>
            <!--
             Corresponds to the ISO-code for Austria
              -->
            <Id>AT</Id>
            <SchmeNm>
              <!--
                  Code for the type –
            for the receiver it is always Authority Code
               -->
              <Prtry>Authority code</Prtry>
            </SchmeNm>
          </Othr>
        </OrgId>
      </Id>
    </OrgId>
  </To>
  <!--
      Corresponds to the instance identifier in the header
   -->
  <BizMsgIdr>1</BizMsgIdr>
  <MsgDefIdr>auth.016.001.01</MsgDefIdr>
  <!--
      Corresponds to CreationDateAndTime in the header of the
original report
```

```xml
                -->
            <CreDt>2016-10-31T14:05:39Z</CreDt>
          </Rltd>
        </AppHdr>
      </Hdr>
      <!--
      Content of the feedback (Payload Section – ESMA Feedback)
      -->
      <Pyld>
        <Document
xmlns="urn:iso:std:iso:20022:tech:xsd:DRAFT5auth.031.001.01">
          <FinInstrmRptgStsAdvc>
            <StsAdvc>
              <!--
                Corresponds to the instance identifier in the header
               -->
              <MsgRptIdr>1</MsgRptIdr>
              <MsgSts>
                <!--
                  Code for the status according to the ESMA definition:
                    ACPT ... Accepted
                    PART ... Partially Accepted
                    RCVD ... Received
                    RJCT ... Rejected
                    RMDR ... Reminder of a non-received report.
                    INCF ... Incorrect Filename
                    CRPT ... Corrupt file
                    WARN ... Warning
                 -->
                <RptSts>RJCT</RptSts>
                <!--
                  Statistics on the result of the validation
                 -->
                <Sttstcs>
                  <!--
                    Total number of records in the file
                   -->
                  <TtlNbOfRcrds>8</TtlNbOfRcrds>
                  <!--
                    List of results per validation status
                   -->
                  <NbOfRcrdsPerSts>
                    <!--
                      Number of records per status
                     -->
                    <DtldNbOfTxs>2</DtldNbOfTxs>
                    <!--
          Code of the status of the transaction according to the ESMA
definition:
                        ACPT ... Accepted
                        ACPD ... Accepted after pending
                        PDNG ... Pending
                        RJPD ... Rejected after pending
                        RJCT ... Rejected
                        RCVD ... Received
                        WARN ... Warning
                     -->
```

```
                <DtldSts>RJCT</DtldSts>
              </NbOfRcrdsPerSts>
            </Sttstcs>
          </MsgSts>
          <!--
           List of results per erroneous record
           -->
          <RcrdSts>
            <!--
             Unique identification code of the record
             -->
            <OrgnlRcrdId>00987654321009876543TXN13</OrgnlRcrdId>
            <!--
        Code of the status of the transaction according to the ESMA
definition:
                ACPT ... Accepted
                ACPD ... Accepted after pending
                PDNG ... Pending
                RJPD ... Rejected after pending
                RJCT ... Rejected
                RCVD ... Received
                WARN ... Warning
             -->
            <Sts>RJCT</Sts>
            <VldtnRule>
              <!--
               Identifier for the triggered error code
               -->
              <Id>CON-412</Id>
              <!--
               Description of the error code
               -->
              <Desc>
                 Instrument Inst1 is not valid in reference data on
                 transaction date
              </Desc>
              <Issr>Entity</Issr>
            </VldtnRule>
          </RcrdSts>
        </StsAdvc>
      </FinInstrmRptgStsAdvc>
    </Document>
  </Pyld>
 </BizData>
</sh:StandardBusinessDocument>
```

2.2.1 Error messages during enveloping (ATX errors)

During the enveloping process following error messages can be generated and will be sent to the sender of the file:

ATX-002   Exite Link header version not supported

ATX-003   Exite Link receiver is invalid

ATX-004   Production reports are not allowed in the test environment - document type: xxx

ATX-005   Test reports are not allowed in the production environment - document type: xxx

ATX-006   Undefined document type: xxx

ATX-007   Instance Identifier is not numeric: xxx

ATX-008   Instance Identifier xxx was already reported

ATX-009   Type in the Exite Link header 'xxx' is not equal to the Type in the reporting 'xxx'.

ATX-010   Sender in the Exite Link header 'xxx' is not equal to the Sender in the reporting 'xxx'.

ATX-011   Receiver in the Exite Link header 'xx' is not equal to the Receiver in the reporting 'xxx'.

ATX-012   Instance Identifier in the Exite Link header 'xxx' is not equal to the Instance Identifier in the reporting 'xxx'.

ATX-013   Creation Date And Time in the Exite Link header is not reported.

ATX-014   Creation Date And Time in the reporting is not reported.

ATX-015   Creation Date And Time in the Exite Link header doesn't seem to be a date: xxx

ATX-016   Creation Date And Time in the reporting doesn't seem to be a date: xxx

ATX-017   Creation Date And Time in the Exite Link header is in the future: xxx

ATX-018   Creation Date And Time in the reporting is in the future: xxx

ATX-019   The reported LEI 'xxx' is not known in the LEI database.

ATX-020   The executing firm (xxx) must be authorised by the FMA to send reports to the FMA EDI ADDRESS.

ATX-021   The encrypted data stream is not BASE64 encoded.

ATX-022   The encrypted data stream cannot be decrypted.

ATX-023   The encrypted data stream cannot be decrypted.

2.3   Remarks about reporting

Reports must be exchanged in XML format.

For the submission and routing of the data via the BUSCON services, reports must be enveloped as <sh:*StandardBusinessDocument*s>.

The content of the actual data files about transactions within the element <datatrans:TransReportsXMLFile> is encrypted using GNU PGP and is submitted base64 encoded in the element in question.

For every submitted file the sender (submitting firm) received as least 1 feedback file from the FMA. There is no separate notification of reception of a file. Feeback, whether a file was OK or NOK (file validation) will be sent together with any other feedback in relation to content errors (content validation). The content of the feedback file is not encrypted since it does not contain any sensitive information.

Process overview:
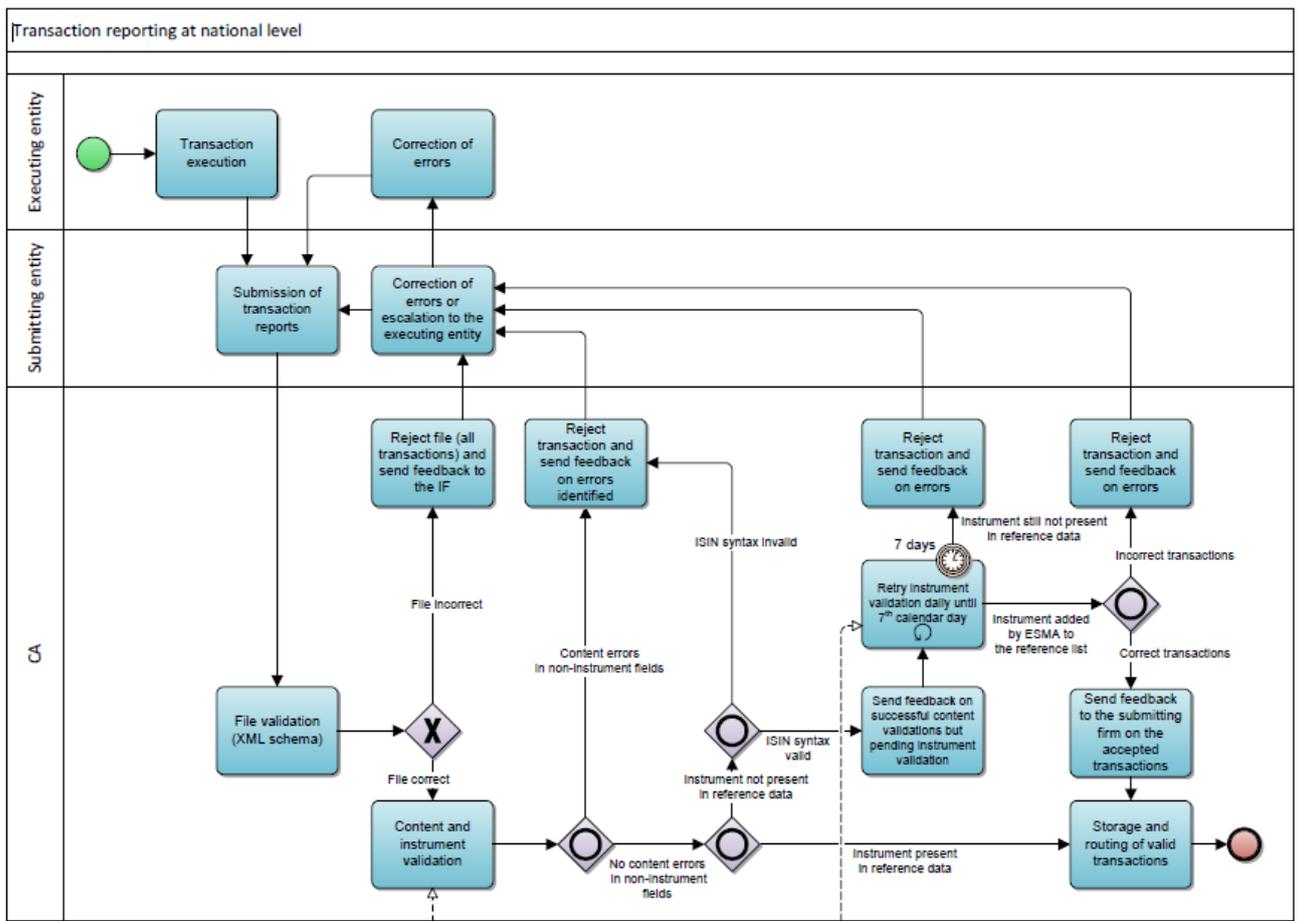
Transactions, for which the financial instrument cannot be found in the reference data made available by ESMA, are listed in the feedback file under <datatrans:PendingTrans> as a list of "Pending Transactions", unless they give rise to another Content Error. Generally "pending transactions" shall be considered as valid submitted transactions, which will also be reflected in the status code of the feedback file. However, if after 7 calendardays reference data is still not available for the ISIN codes submitted for these transactions, then the institution under reporting obligations shall receive an additional feedback file, in which the "pending transactions" are reported as content errors.

If the value of the attribute <StatusCodeId> of the element <datatrans:StatusCode> is less than 0, this means that the entire submitted file containing all transactions was rejected. If the value is greater than 0, then "Content Errors" exist. The rejected transactions are reported with the corresponding cause of the error in the element <datatrans:ErrnousTrans> as a list comprising the element <datatrans:Trans> including the corresponding error code and error message. All other transactions in the submitted file were process accordingly or are listed in <datatrans:PendingTrans>.

2.4 Submission of instrument reference data by Systematic Internalisers

For the submission of instrument reference data by Systematic Internalisers pursuant to Art. 27 MiFIR, the same EDI address like for sending transaction reports pursuant to Art. 26 MiFIR can be used. Encyrption will be done via the same public key as for transaction reporting (please see Chapter 2.5).

Description of the file to be submitted:

```xml
<?xml version="1.0" encoding="utf-8" standalone="yes"?>

<!-- Data were submitted as standard business document -->
<sh:StandardBusinessDocument
xmlns:sh="http://www.unece.org/cefact/namespaces/StandardBusinessDocumentHe
ader">
    <sh:StandardBusinessDocumentHeader>
        <sh:HeaderVersion>1.0</sh:HeaderVersion>
        <sh:Sender>
            <!--
                EDI Address of the submitting firm
              EDI address of your firm submitting the file
            -->
            <sh:Identifier>ATBWATEST</sh:Identifier>
        </sh:Sender>
        <sh:Receiver>
            <!--
                 EDI Address of the receiver
              For tests please use
              ATBWATEST (EDI Address of the FMA for tests)
              For files to be sent to the production environment
              ATBWA (EDI Address of the FMA for the production
              environment)
            -->
            <sh:Identifier>ATBWATEST</sh:Identifier>
        </sh:Receiver>

        <sh:DocumentIdentification>
            <sh:Standard>EAN.UCC</sh:Standard>
            <sh:TypeVersion>2.5</sh:TypeVersion>
            <!--
                    Instance identifier
              For each file an ascending unique code to be used. FMA
              uses this code also for feedback files and also FIRDS
              hosted by ESMA uses this code
             -->
            <sh:InstanceIdentifier>1</sh:InstanceIdentifier>
            <!--
                Message Type
                 For tests always use FIRDSTEST
                 For production always use FIRDSPROD
            -->
```

```xml
            <sh:Type>FIRDSTEST</sh:Type>
            <sh:CreationDateAndTime>
                2016-10-31T14:05:38+01:00
            </sh:CreationDateAndTime>
        </sh:DocumentIdentification>
    </sh:StandardBusinessDocumentHeader>


    <!--
   Content of the FILE (Payload Section)
    -->


    <datatrans:content
            xmlns:eXite_link="http://www.editel.at/xml/eXite_link/message/"
            xmlns:datatrans="http://mifirtrans.fma.gv.at"
             eXite_link:encoding="utf-8"
eXite_link:standalone="yes"
eXite_link:xmlversion="1.0"
            <!--
             Corresponds to the EDI Address of the sender n the Header
            -->
             datatrans:Sender="ATBWATEST"
             <!--
             Corresponds to the EDI Address of the receiver in the Header
            -->
             datatrans:Receiver="ATBWATEST"
             <!--
                Corresponds to the instance identifier in the Header
            -->
             datatrans:InstanceIdentifier="1"
             <!--
             Corresponds to the Message Type in the Header
            -->
             datatrans:Type="FIRDSTEST"
             <!--
             Corresponds to the CreationDateAndTime in the Header
            -->
             datatrans:CreationDateAndTime="2016-10-31T14:05:39+01:00">
<!--
XML File according to ESMA standards, encrypted through GNU PGP and BASE64
encoded.
Within the following elements the XML File, which is created according to
ESMA standards, will be submitted containing all financial instrument
reference data.
The file to be submitted, shall be encrypted through GNU PgP with the
public key provided by the FMA and shall be encoded via base64 as part of
the element <datatrans:TransReportsXMLFile>.

The Submitting Firm (LEIOFSUBMITTINGFIRM) must be authorised by the FMA to
submit reports for the relevant MIC (Market Identifier Code).
       -->
        <datatrans:TransReportsXMLFile
            <!--
                LEIOFSUBMITTINGFIRM
              Identification of the Submitting Firm.
                    Has to be a valid LEI.
              Must be authorised to submit to the EDI Address of the FMA
                Must be authorised for the relevant MIC (forMIC)
```

```
                    -->
            datatrans:repFirmIdent="LEIOFSUBMITTINGFIRM"
             datatrans:forMIC="MICCODE"


        >
            <!-
                DATENFILE
                base64 encoded and previously through GNU PgP encrypted
                XML File with instrument reference data for the
                relevant MIC Code (forMIC)
                The file is validated against ESMA standards and the
                according validation rules published in the
                specifications.
            -->
            AANDGGDHSKKLKSKKLKLKLJKLKJKLJLKMMIILJSLKLMSMKLMKL
        </datatrans:TransReportsXMLFile>


    </datatrans:content>


</sh:StandardBusinessDocument>
```

Feedback Files will be sent in the following schema:

```
<?xml version="1.0" encoding="utf-8" standalone="yes"?>


<!-- Data were submitted as standard business document -->
<sh:StandardBusinessDocument
xmlns:sh="http://www.unece.org/cefact/namespaces/StandardBusinessDocumentHe
ader">
    <sh:StandardBusinessDocumentHeader>
        <sh:HeaderVersion>1.0</sh:HeaderVersion>
        <sh:Sender>
            <!--
                EDI Address of the submitter
                    For tests
                    ATBWATEST (EDI Address of the FMA for tests)
                    For production
                    ATBWA (EDI Address of the FMA for production)
            -->
            <sh:Identifier>ATBWATEST</sh:Identifier>
        </sh:Sender>
        <sh:Receiver>
            <!--
                EDI Address of the RECEIVER
                EDI Address of the sender (Submitting Firm) of the
        original file to which the feedback corresponds.
            -->
            <sh:Identifier>EDIRECEIVER</sh:Identifier>
        </sh:Receiver>

        <sh:DocumentIdentification>
            <sh:Standard>EAN.UCC</sh:Standard>
            <sh:TypeVersion>2.5</sh:TypeVersion>
            <!--
                Instance identifier
                The instance identifier as sent by the submitting firm
```

```xml
        -->
        <sh:InstanceIdentifier>1</sh:InstanceIdentifier>
        <!--
                Message Type
                For tests always use FIRDSTEST
                For production always use FIRDSPROD
        -->
        <sh:Type>FIRDSTEST</sh:Type>
        <sh:CreationDateAndTime>
                2016-10-31T14:05:38+01:00
        </sh:CreationDateAndTime>
    </sh:DocumentIdentification>
  </sh:StandardBusinessDocumentHeader>
<BizData
    xsi:schemaLocation="urn:iso:std:iso:20022:tech:xsd:head.003.001.01
head.003.001.01.xsd"
    xmlns="urn:iso:std:iso:20022:tech:xsd:head.003.001.01"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance">
    <Hdr>
        <AppHdr

xsi:schemaLocation="urn:iso:std:iso:20022:tech:xsd:head.001.001.01
head.001.001.01_ESMAUG_1.0.0.xsd"
            xmlns="urn:iso:std:iso:20022:tech:xsd:head.001.001.01"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance">
            <Fr>
                <OrgId>
                    <Id>
                        <OrgId>
                            <Othr>
                                <Id>EU</Id>
                            </Othr>
                        </OrgId>
                    </Id>
                </OrgId>
            </Fr>
            <To>
                <OrgId>
                    <Id>
                        <OrgId>
                            <Othr>
                                <Id>NCAAT</Id>
                            </Othr>
                        </OrgId>
                    </Id>
                </OrgId>
            </To>
            <!--
            BizMsgIdr  Correponds to the instance identifier in the header
            -->
            <BizMsgIdr>1</BizMsgIdr>
            <MsgDefIdr>DRAFT4auth.031.001.01</MsgDefIdr>
            <CreDt>2017-06-30T11:02:05Z</CreDt>
            <Rltd>
                <Fr>
                    <OrgId>
                        <Id>
```

```
                    <OrgId>
                        <Othr>
                            <Id>NCAAT</Id>
                        </Othr>
                    </OrgId>
                </Id>
            </OrgId>
        </Fr>
        <To>
            <OrgId>
                <Id>
                    <OrgId>
                        <Othr>
                            <Id>EU</Id>
                        </Othr>
                    </OrgId>
                </Id>
            </OrgId>
        </To>
    <!--
    BizMsgIdr  Corresponds to the instance identifier in the header
    -->
        <BizMsgIdr>1</BizMsgIdr>
        <MsgDefIdr>DRAFT13auth.017.001.01</MsgDefIdr>
        <CreDt>2017-06-29T10:19:09Z</CreDt>
    </Rltd>
</AppHdr>
</Hdr>
<Pyld>
    <Document
```

xsi:schemaLocation="urn:iso:std:iso:20022:tech:xsd:DRAFT4auth.031.001.01
DRAFT4auth.031.001.01_ESMAUG_FDB_1.0.0.xsd"
        xmlns="urn:iso:std:iso:20022:tech:xsd:DRAFT4auth.031.001.01"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance">

```
        <FinInstrmRptgStsAdvc>
            <StsAdvc>
                <MsgSts>
                    <RptSts>PART</RptSts>
                </MsgSts>
                <RcrdSts>
                    <OrgnlRcrdId>2017-06-29000005</OrgnlRcrdId>
                    <Sts>WARN</Sts>
                    <VldtnRule>
                        <Id>INS-128</Id>
                        <Desc>The following fields are not consistent
with the one provided by IE: 2, 3, 5, 7.</Desc>
                    </VldtnRule>
                </RcrdSts>
                <RcrdSts>
                    <OrgnlRcrdId>2017-06-29000139</OrgnlRcrdId>
                    <Sts>WARN</Sts>
                    <VldtnRule>
                        <Id>INS-128</Id>
                        <Desc>The following fields are not consistent
with the one provided by TA: 2, 3, 5, 7, 13, 14, 15, 16, 17, 18, 23,
25.</Desc>
```

```
                    </VldtnRule>
                </RcrdSts>
            </StsAdvc>
        </FinInstrmRptgStsAdvc>
      </Document>
    </Pyld>
</BizData>
</sh:StandardBusinessDocument>
```

2.5   Encryption of the XML data file

The content of the actual data files about securities transactions within the element <datatrans:TransReportsXMLFile> must be encrypted using GNU PGP and is submitted "base64 encoded" in the element in question.

GNU PGP is a free tool for all computer architectures for encrypting and decrypting data and can also be very easily integrated into batch programs. See https://www.**gnupg**.org/

Since only the XML data file can be encrypted by the institution under reporting obligations, and the FMA does not encrypt its feedback files, it suffices that the institution under reporting obligations imports the Public Key made available by the FMA into its GNU PG Database and then uses this to encrypt data.

The   public   key   can   be   found   and   downloaded   under: https://webhost.fma.gv.at/TRSYS/Verschluesselung.

2.6   Testing environment

The FMA provides a testing environment available to the reporting parties since Autumn 2017.

The testing environment applies all the checking rules that are also conducted in actual operation, and sends feedback in an analogue manner to the way it is sent in ongoing actual operation. The same information fetched and processed in the real environment is also used in the testing environment.

The EDI Address for receiving test reports is "ATBWATEST".

⚠️ **IMPORTANT: Contrary to the test environment provided by the FMA, tests within the Readiness Portal in MyStandards shall not be conducted using real data! The Readiness Portal in MyStandards is an open system.** ⚠️

Generally speaking the settings of the "Meldezuordnung" as provided within the Online Registrierungs-Tool (ORT) are applied (see chapter 2.4.1). Consequently, test files can only be submitted for the correct combination of executing entity LEI and EDI address of the sender as set within ORT.

To allow for tests without an actual client or without a corresponding combination of executing entity LEI and EDI address of the sender yet, it is possible to use the LEI of the Austrian FMA (529900UTJ8SZV8VFTQ77) as executing entity. In such case the files will be processed in our test environment.

2.7   Contact details

Technical enquiries in relation to the MiFIR reporting regime should be sent to the following mailbox:

mifir-reporting@fma.gv.at

Policy enquiries should be sent to the mailbox at:

transaction-reporting@fma.gv.at

2.8   Additional Links

- Commission Delegated Regulation (EU) 2016/590 (former RTS 22) - LINK
- ESMA Reporting instructions - LINK
- MyStandards - LINK