

Annex

The following table lists the new data points that must be reported, namely fields 17 to 26 of Table 1 – Counterparty Data of the reporting form.

Field number	Field	Details to be reported	Comments
17	Mark-to-market or mark-to-model value of contract	Mark-to-market valuation of the contract, or mark-to-model valuation where applicable under Article 11(2) of Regulation (EU) No. 648/2012.	FCs and NFC+s must report the mark-to-market (or mark-to-model, if used in accordance with the conditions set out in EMIR) value of outstanding contracts. This must be reported following execution of the trade (at the end of the business day following the date of execution) and following any change to the valuation (at the end of the business day following the day in which the value changed – so on every business day in most cases). ESMA has confirmed in its Q&As that (i) it is not possible to report “zero” in this field on the basis that there is no market risk because variation margin is paid and (ii) the mark-to-market value should be based on the mid-price of the market from which the prices are taken as reference.
18	Currency of mark-to-market value of the contract	The currency used for the mark-to-market valuation of the contract, or mark-to-model valuation where applicable.	N/A
19	Valuation date	Date of the last mark-to-market or mark-to-model valuation.	N/A
20	Valuation time	Time of the last mark-to-market or mark-to-model valuation.	N/A
21	Valuation type	Indicate whether valuation was performed mark-to-market or mark-to-model.	N/A
22	Collateralisation	Whether collateralisation was performed.	This requires a “Y” or “N” response.

23	Collateral portfolio	Whether the collateralisation was performed on a portfolio basis (i.e., whether the collateral amount was calculated on the basis of net positions resulting from a set of contracts, rather than per trade).	This requires a “Y” or “N” response. If collateral is calculated on a “portfolio” basis (i.e., on a net basis across a portfolio), current industry understanding is that details of the collateral need only be provided in the report for one transaction that is within the portfolio that is subject to the net calculation. Each transaction within the portfolio will then be linked to details of the collateral reported by virtue of bearing the same “collateral portfolio code” (see below).
24	Collateral portfolio code	If collateral is reported on a portfolio basis, the portfolio should be identified by a unique code determined by the reporting counterparty.	There is as yet no methodology for producing the collateral portfolio code, so the counterparty must determine the code. There is also not (as yet) any requirement for both counterparties to share the same code.
25	Value of the collateral	Value of the collateral posted by the reporting counterparty to the other counterparty. Where collateral is posted on a portfolio basis, this field should include the value of all collateral posted for the portfolio.	Current industry understanding is that collateral only needs to be reported where the netted amount results in a delivery by the counterparty. Therefore, no reporting is required where there is a net posting of collateral to the counterparty. Also, current industry understanding is that this is the full value of the collateral posted, not any “haircutted” value and that this is the aggregate value of all cash and non-cash collateral posted. The amount reported should be net of payments such as fees, interest and swap coupons.
26	Currency of the collateral value	Specify the value of the collateral for field 25.	The form does not mandate a given currency for the value of the collateral reported. Industry understanding is that the collateral value should be reported as an aggregate value in any appropriate currency.
58	Action type	Any change in fields 17 to 26 must be reported in this field.	Among other things, each change in the mark-to-market or mark-to-model valuation (field 17) and change in the value of collateral posted (field 25) must be reported in this field.