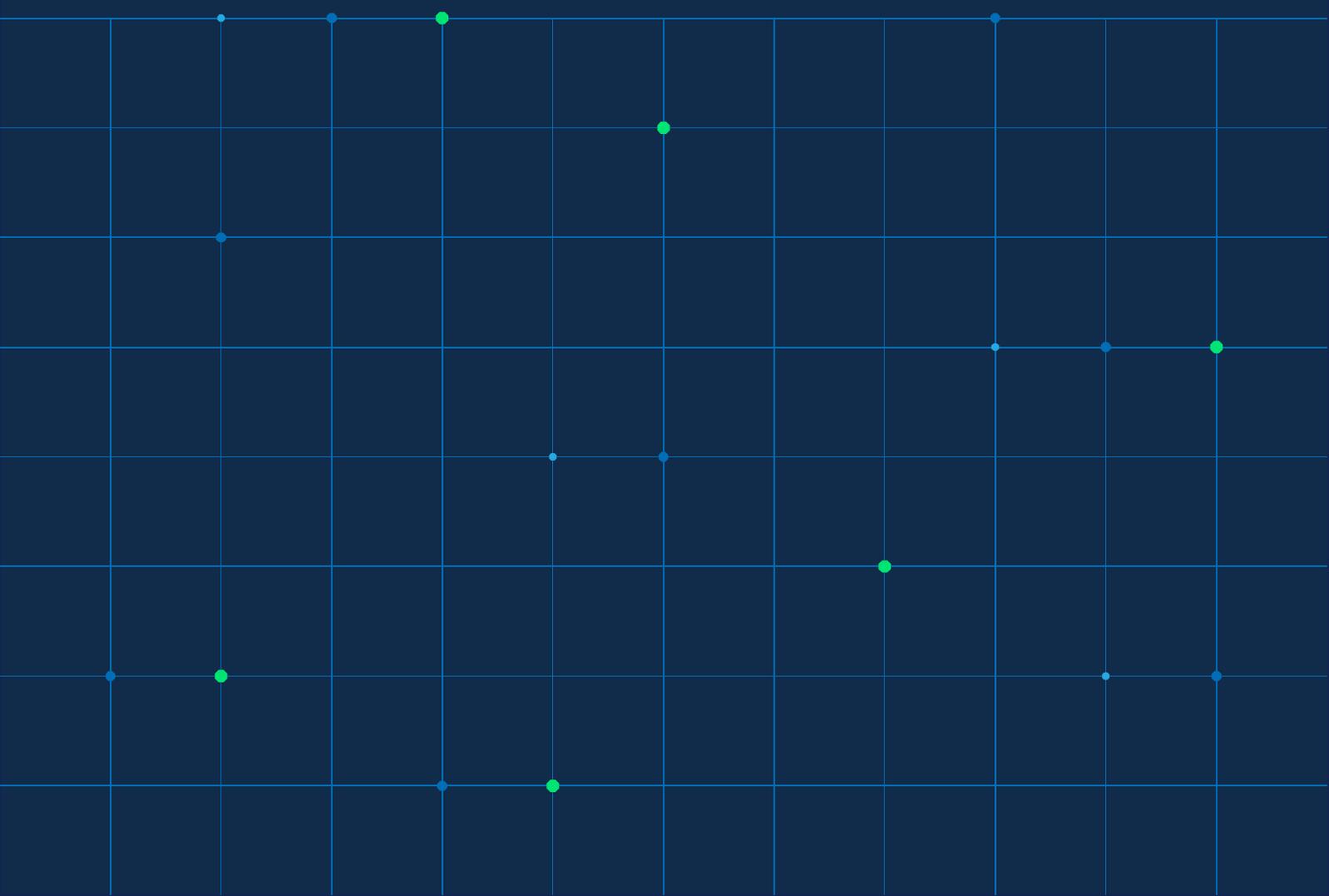


NRR FAQ

v.2 July 2020



NEX Regulatory Reporting Client Q&A

The following information is provided to answer any immediate questions that our clients may have surrounding the wind down of NRR Regulatory Reporting (comprising Abide Financial) This list is not exhaustive, and we ask that any additional questions surrounding the wind down are directed to your account manager or emailed to exit-management@abide-financial.com.

1. Why is the wind down period six months?

We recognise the importance of an orderly wind down of our services and also the challenge for our clients to transition to a new service provider during the wind down period. As a result, by providing clients with a long notice period we are aiming to provide the time they need to connect to a new service provider.

2. What levels of support can I expect over the wind-down period?

Over the wind down period there will be no changes to hours of support or your email and phone number contacts. NRR recognizes that an orderly wind down of the businesses is of paramount importance and is committed to support our clients fully during the wind down period

3. I will need more time to find an alternative solution. Can this be extended?

NRR recognises the complex nature of transaction reporting and we will assist you throughout the transition. Unfortunately, the last day of service cannot be extended and we encourage you to find an alternative solution as soon as possible to allow sufficient time to complete the transition of your reporting.

4. Are any of the other services I use within the wider CME Group affected?

Only the assets of NRR Regulatory Reporting, CME Trade Repository Limited (CME European Trade Repository), NEX Abide Trade Repository AB and CME Australian Trade Repository will be affected by this wind-down. Clients who have relationships with other CME Group or legacy NEX entities will not be impacted but can talk to their account manager if they have any questions.

5. Do I need to contact my regulator (National Competent Authority (NCA) regarding the wind down of services?

NRR has worked and will continue to work closely with applicable regulatory authorities in the execution of the wind down process. ESMA, the FCA and AFM are aware of the wind down and will continue to oversee the relevant regulated businesses during the wind down process to ensure an orderly cessation of operations in compliance with applicable requirements. Other relevant regulatory authorities to which NRR Regulatory Reporting businesses provide data or data access in the course of their operations have also been informed. However, NRR Regulatory Reporting clients should consider whether they have any obligation to inform their own regulators of any change to their reporting arrangements. NRR cannot advise clients on their individual notification requirements to their own regulators.

6. Will I be billed during the NRR wind down?

Standard NRR Regulatory Reporting Hub fees will remain in place for as long as you continue to utilize the services with the exception of fees for SFTR services which will not be charged. Any onboarding to NRR performed in 2020 will not be charged for. The details of this should be discussed with your account manager.

7. When will the final invoice be issued?

Your billing is completed monthly in arrears. NRR will endeavour to issue a final invoice within three months from the last service date and no later than December 2020.

8. I am midway through the onboarding process, shall I continue?

With the exception of SFTR, all outstanding NRR onboarding projects will be stopped, effective immediately. Clients are advised to look for alternative providers. SFTR will be supported through the wind down period but no further development will take place.

9. NRR provides complex pre-processing logic for us in their reporting hub, how can we transfer this to another provider?

NRR will provide full transparency of all pre-processing logic back to our clients to aid with a smooth transition to another provider, within reason. Additionally, any python scripts, content or proprietary logic will be uploaded to the client outgoing sFTP folder for use by clients, subject to conditions of acceptable use and access.

10. Will NRR provide copies of our data should we require them as part of the wind down?

NRR can provide, exports of your data in a machine-readable format prior to cessation of operations. We encourage clients to use the client portal through the wind down period to ensure they have an accurate copy of their own reporting. After the completion of the wind down of the services it will not be possible to request or access any current or historic data from NRR. If a client is relying on NRR to fulfil data retention obligations, it should consider its data retention requirements carefully as part of the transition to another vendor.

11. Will NRR assist us with finding a new provider?

While will not advise or recommend new providers or assist directly with onboarding to alternative vendors, we will be making all of our NRR specifications and content available to clients to assist with making your transition to a new provider as straightforward as possible. This information can also be made available to alternative vendors on request.

MiFID II

12. What will happen to the ARM and APA licenses?

The NRR ARM and APA licenses are being withdrawn. You will need to find an alternative provider to remain compliant, or self-report to your appropriate National Competent Authority. NRR will work with you and other reporting incumbents, within reason, to assist with a smooth transition to another vendor.

13. What is your last day for accepting Transaction and Transparency reports?

The last date we will accept and report data on your behalf will be Friday 20 November 2020.

Therefore, we strongly recommend that you transfer to a new provider **as soon as possible**, to take advantage of our support and remediation services prior to closure of the business on 30 November 2020. There will be no support or access to NRR data past this date. **The continuity of your reporting remains the responsibility of the investment firm.**

14. We are currently engaged in back reporting with NRR. What will happen to my back reporting when the services are discontinued?

Back reporting is the responsibility of investment firms. Back reporting channelled through NRR must be complete by 31 October 2020. No back-reporting ability will exist within NRR post wind down. A reminder that

amendments to transaction reports may be made by a different submitting entity to the one that submitted the original report. For example, an investment firm may have used one ARM to submit the original report and may cancel the report itself or use another ARM - so as long as back reporting is completed as per the investment firms obligations, it does not have to be done before moving to the new provider.

Transaction Reporting ARM

15. What happens to records that are not accepted or awaiting a response by a regulator at the time of the ARM discontinuing?

We would encourage clients to remediate all outstanding transactions where there is no terminal state with their NCA. NRR will assist with remediation tasks but clients are advised that after the cessation of the ARM services, future reporting is the responsibility of the investment firm.

16. Can we have backups of all the data we've sent to you?

NRR can provide exports of your data in a machine-readable format prior to cessation of operations. We encourage clients to use the client portal through the wind down period to ensure they have an accurate copy of their own reporting. After the completion of the wind down of the services it will not be possible to request or access any current or historic data from CME. If a client is relying on NRR to fulfil data retention obligations, it should consider its data retention requirements carefully as part of the transition to another vendor.

17. What will happen to all my personal data held in ISCI?

All personal data held in ISCI (Industry Standard Common Identifier) will be available in the application to be downloaded by clients. Clients are encouraged to download their data over the coming months and reminded that the accuracy of their reporting of execution decision maker detail is the responsibility of the investment firm.

18. What happens to transactions and their responses post wind down, should they be in a non-terminal state?

We would encourage clients to remediate all outstanding transactions (where there is no terminal state) with their NCA. Such information has to date been available in the client portal and will continue to be until the cessation of operations, scheduled for 30 November 2020. Therefore, any records in such state are and will remain available to clients to review and remediate prior to completion of the wind down of NRR. There will be no information retained post wind down, so clients will not be able to remediate any records with assistance from NRR after this date.

Transparency (APA)

19. Will NRR provide copies of our data should we require them as part of the wind down?

NRR can provide, upon request, an export of your data in a machine-readable format prior to cessation of operations. After the completion of the wind down of the services it will not be possible to request or access any current or historic data from CME. If a client is relying on NRR to fulfil data retention obligations, it should consider its data retention requirements carefully as part of the transition to another vendor.

20. Will NRR provide instructions/support with understanding the data?

Specifications will be made available on the NRR website <https://www.cmeregreporting.com/information>

21. Will NRR assist with altering the format of my data to a new provider.

NRR will supply the field specification documentation to enable you or your new provider to import the data into a new database.

22. NQU and NTR reports are always T-7 does that mean I need to have gone live with my new APA at least 7 days before the APA is shut down?

Yes, while we will accept reports into the APA until 20 November 2020, we recommend that you transfer to a new provider as soon as possible (but a minimum of 7 days prior to this date) to take advantage of support and remediation services prior to closure of the business on 30 November 2020.

EMIR

23. What will happen to my EMIR reporting as this is currently reported by NRR to CME Trade Repository Limited (CME European Trade Repository (CME ETR))?

CME ETR is being wound down along with the services of NRR. CME ETR data will be ported to alternative EMIR trade repositories, in accordance with regulatory requirements. Please review the CME ETR FAQ [<https://www.cmegroup.com/trading/global-repository-services/client-notifications.html>] for full details on the porting process. Porting of your data held in the CME ETR must occur no later than 20 November 2020 to an alternative EMIR trade repository selected by you or your new reporting service provider. Should you require transfer of your data please coordinate with your account manager to arrange a suitable date for the transfer of your data to an alternative EMIR trade repository.

24. What is your last day for accepting Trade, Position and Valuation reports?

The last date we will report to CME ETR on your behalf will be for the final good trade date of the week preceding the weekend of your porting. The final possible date of reporting through NRR to CME ETR is Friday 20 November 2020. Therefore, we strongly recommend that you transfer to a new provider **as soon as possible**, to take advantage of our support and remediation services prior to closure of the CME ETR service on 30 November 2020. There will be no support or access to transaction data through NRR or CME ETR past this date and we remind you that **the continuity of reporting remains the responsibility of the relevant derivative counterparty**.

25. How do I port out my EMIR business if I have selected a new vendor (to assist in reporting) and a new Trade Repository (TR)?

- (i) NRR will perform a reconciliation of open trades and positions between the client, NRR and CME ETR.
- (ii) A weekend porting date will be agreed between new vendor, new TR, NRR and CME ETR.
- (iii) Your new TR and CME ETR will organise a transfer of all open trades and positions from CME ETR to the new TR.
- (iv) Once the porting process is completed it will be confirmed back to the client.
- (v) On the Monday following porting all new data, for the first good trade date of the week, will be submitted by the client through the new vendor and on to the new TR.

[Please see Question 31 for further details]

ASIC

26. What is the process for moving positions to the new TR given the CME Australian Trade Repository (ATR) is winding down?

All trades and positions should be closed with ATR before being reopened under the same trade identifiers by the new provider or by direct reporting at your selected new ASIC trade repository. NRR will assist with the closing down of reports relating to trades and positions within CME ATR.

[Please see Question 31 for further details]

SFTR

27. I have recently onboarded with NRR for SFTR, will this be available in production on July 13th?

NRR expects to continue to process SFTR records through the wind down period but there will be no further development on SFTR. We encourage firms to find alternative solutions as soon as possible.

28. Will I be charged for SFTR services?

NRR **will not** be charging for SFTR services and we will assist firms where we can with their transition to another provider. We would encourage firms to find alternative solutions as soon as possible

Regulatory Engagement

29. Are regulators involved in the wind-down process?

NRR has engaged with applicable regulatory authorities in the planning and execution of the wind down process for NATR (ESMA) , AFDL (FCA) and the ARM and APA services within CABV (AFM). NRR will remain in ongoing dialogue with these regulatory authorities during the process.

Contractual Agreements

30. Do I need to terminate my agreement with NRR or will that be done automatically?

NRR will confirm the termination date of contractual agreements with clients by Advisory Notice no later than 30 May 2020 and no further action is required to initiate the process. The effective date of the termination shall be 30 November 2020. NRR clients may request in writing (to exit-management@abide-financial.com) an earlier effective date.

Further details around vendor transition

31. What is the protocol to be observed for a transition to a new vendor or Trade Repository (TR), is it different for each regime?

In general terms once you are in the process of onboarding with a new vendor we need to mutually agree dates for the transition.

- in the event there are no TR's involved then the transition dates, (ie final day of reporting to NEX RR [NRR] followed by the first day of reporting through your new vendor) can be any two consecutive weekdays, or, a Friday & Monday.
- If you are also moving TRs (EMIR/ASIC) then this would require a Transition on a Friday or Monday.

The transition process varies dependent on regime and whether you are going to move to a new EMIR or ASIC TR:

Scenario 1a – EMIR client transitioning to a new vendor only (Continuing to interim report to CME ETR)

- Client and new vendor to agree on, and then request, transition dates with NRR
- NRR will agree dates or offer nearest dates available by mutual agreement
- Client to ensure and attest that remediation is complete or not required.
- On the cessation date for CME RR
 - BAU EMIR reporting takes place.
 - CME RR to send close messages for all open trades/positions to CME ETR.
- On the first day of reporting through new vendor:
 - BAU EMIR reporting takes place and should now re-open relevant trades/positions at CME ETR
- Client to attest they have received any relevant data extracts either via UI download or via request to NRR Support

Scenario 1b - EMIR client transitioning to a new vendor and new Trade Repository

As part of your selection process for a new TR we suggest that you ensure they can meet your requirements around volumes of delegated clients to be Ported and any timeframes you are working to.

- Client and new vendor to agree on and the request transition dates with CME RR, the following to be sent to EXIT-Management@abide-financial.com:
 - Client Name
 - Requested weekend for porting
 - Clients LEI/LEIs
 - Any LEIs related to delegated reporting the client performs
- CME RR will request these dates through the Porting form which we will complete and send to both the CME ETR and target Trade Repository [*In some circumstances we may ask you to send the completed Porting form to the new TR, we will advise on this once your TR choice is known*]
- Trade Repositories will agree on one of the request dates, or, if this cannot be accommodated then an alternative date will be advised.
- CME RR will advise client and new vendor of the proposed Porting Date
- Client to ensure and attest that remediation is complete/not required.
- On the Cessation date for CME RR
 - BAU EMIR reporting takes place.
- On the Porting Weekend
 - Trade Repositories will bilaterally transfer open positions/trades as well as reporting history
- On the first day of reporting through new vendor and Trade Repository:
 - BAU EMIR reporting takes place

- Client to attest they have received any relevant data extracts either via UI download or via request to NRR Support

Scenario 2 - MIFID

- Client and new vendor to agree on and then request transition dates with CME RR
- CME RR will agree dates or offer nearest dates available by mutual agreement
- Client to ensure and attest that remediation is complete/not required.
- Cessation date for CME RR
 - BAU MIFID reporting takes place.
- First Date reporting through new vendor:
 - BAU MIFID reporting takes place
- Client to attest they have received any relevant data extracts either via UI download or via request to NRR Support

Scenario 3a - ASIC client transitioning to a new vendor only (Continuing to Interim report to CME ATR)

- Client and new vendor to agree on and then request transition dates with CME RR
- CME RR will agree dates or offer nearest dates available by mutual agreement
- Client to ensure and attest that remediation is complete/not required.
- On the Cessation date for CME RR
 - BAU ASIC reporting takes place.
 - CME RR to send close messages for all open trades/positions to CME ATR.
- On the First Day reporting through new vendor:
 - BAU ASIC reporting takes place and should now re-open relevant trades/positions at CME ATR
- Client to attest they have received any relevant data extracts either via UI download or via request to NRR Support

Scenario 3b - ASIC to new vendor and Trade Repository

- Client, new vendor and new Trade Repository to agree on and then request transition dates with CME RR
- CME RR will agree dates or offer nearest dates available by mutual agreement
- Client to ensure and attest that remediation is complete/not required.
- On the Cessation date for CME RR
 - BAU ASIC reporting takes place.
 - CME RR to send close messages for all open trades/positions to CME ATR.
- On the First Day of reporting through new vendor and Trade Repository:
 - BAU ASIC reporting takes place and should now open relevant trades/positions at new Trade Repository
- Client to attest they have received any relevant data extracts either via UI download or via request to NRR Support

Scenario 4 - MAS (Still reporting to DTCC TR)

- Client and new vendor to agree on and then request transition dates with CME RR
- CME RR will agree dates or offer nearest dates available by mutual agreement
- Client to ensure and attest that remediation is complete/not required.
- On the Cessation date for CME RR
 - BAU MAS reporting takes place.

- CME RR to send close messages for all open trades/positions to CME ATR.
- On the First Day of reporting through new vendor:
 - BAU ASIC reporting takes place and should now re-open relevant trades/positions at DTCC TR
- Client to attest they have received any relevant data extracts either via UI download or via request to NRR Support

32. Are there any prerequisites required for transition?

We strongly advise that clients consider the following immediately as failure to do so may delay any transition to your new vendor.

Remediation

Remediation of records in a non-terminal state **must** be completed prior to transition to a new vendor. The Service Delivery team will be available to support you in this activity. Further details of how that can be achieved can be found here: *Attachment*

Data Back up

We advise that you consider what data you would like to extract from CME RR for each regime via the options below. This Data will be available for 30 days post your transition or until 30th November, whichever is sooner. NRR remind you that after the ARM and APA has gone away understanding your historic reporting is the responsibility of the investment firm

- **EMIR, ASIC, MAS & MIFID Hub:**
 - **Portal:** Data can be extracted directly from the Portal which has recently had its extraction data range extended from 3 to 6-month intervals. If you require the execution decision maker detail unmasked, please contact NRR support
 - **Support:** If obtaining data from the portal is not practical (*due to volume of records exceeding 10 Million supported for download*) then please raise a ticket with NRR support who can arrange for an extract from the database to be generated and placed on your outgoing SFTP folder
- **MIFID ARM**
 - **Weekly extracts:** At the end of July we will begin rolling out an extraction of all your ARM data and placing this in the outgoing folder of your SFTP on a weekly basis. Each week you will receive the complete history to that data.
- **APA/Transparency/IRD**
 - Data extracts will be available on request

[If your question is not answered here](#)

Please contact your sales representative or contact exit-mangement@abide-financial.com and we will endeavour to respond as soon as possible

