EMIR FOR BEGINNERS

Energy Norways EMIR guide

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EMIR for beginners – Energy Norway's EMIR guide

This document is a guide for assisting companies in implementing EMIR, the European Markets Infrastructure Regulation. Finanstilsynet, the Norwegian FSA, pointed out at Energy Norway's seminar on 13. June 2017 and on their homepage in an article dated 9.6.2017 that EMIR comes into force in Norway on the 1 July 2017. Finanstilsynet expects firms to start complying with the EMIR obligations as from that date, even though the implementing legislation is not yet officially adopted. For the electricity sector, these obligations concern the determination of the counterparty status and the implementation of risk mitigation procedures for OTC derivatives. More details below. Reporting will start from the 1 January 2018 according to Finanstilsynet, again before formal implementing legislation might be in place. Again, more details below.

Finanstilsynet pointed out, that they will always aim at applying the current status of the EMIR rules, in the form and shape they are enforced in the EU. This means in practice that Norwegian firms can implement directly the currently applicable version of the EMIR obligations, without starting with previous and outdated versions.

This guide is meant to point companies in the right direction, but it cannot replace company internal processes, due diligence and documentation. This guide is not legally binding and should be considered as a living document. It may (but must not) be updated from time to time, if for example ESMA, the European Securities Markets Authority, publishes new guidance or EMIR legislation gets revised. There will be frequent references to legal texts in this document; links to all referenced legal text will form a separate chapter of the document.

Oslo 9.10.2017

Get to know the laws and regulations

Identify and read the rules applicable to your business. EMIR consists of the text of the European regulation itself, also called Regulation (EU) No 648/2012 on OTC derivatives, central counterparties and trade repositories or EMIR level 1. There are also legally binding technical standards, so called Regulatory Technical Standards (RTS) and Implementing Technical Standards (ITS) also described as EMIR level 2. Especially the RTS called Commission Delegated Regulation (EU) No 149/2013 or short RTS 149 is relevant for our sector. Last but not least ESMA publishes regularly updated Question and Answers Documents, which provide guidelines for interpretation of EMIR. Those Q&As are called EMIR level 3.

Definitions under MiFID (I and II as of 03.01.2018) are also relevant. Since reporting starts as of 1. January 2018, we recommend using MiFID II definitions for the identification of financial contracts from the beginning.

European regulation is under periodic revision processes, through changes in level 2 legislation, but also through changes of level 1 regulation. The EU Commission has already proposed EMIR II, a revision of the original regulation, which is going currently through the decision-making processes in Europe. In order to follow these processes and be alerted about potential changes, Finanstilsynet's EMIR page is a good starting point.

This guide contains a reference to the relevant legal text for every obligation described therein and links to the relevant legal texts under the chapter "Useful Links".

What and who is in scope of EMIR

Everyone trading in financial derivatives is in the scope

EMIR regulates primarily non-exchange traded financial instruments or "OTC Derivatives", although some obligations apply to all trading with derivatives independently of where they are traded. Financial instruments are currently still defined under MiFID I (Markets in Financial Instruments Directive), which will be replaced by MiFID II Annex 1 Section C and Commission Delegated Regulation (EU) 2017/565 as of 3rd January 2018. Derivatives are a subset of financial instruments, referred to in MiFID Annex 1 Section C4 to 10. As said above, due to reporting starting from 2. January 2018, we recommend using the following MiFID definitions for this purpose:

- The definitions in MiFID I for those contracts, which are entered into before 1. July 2017 and still outstanding on the 2. January 2018 and the contracts entered after 1. July 2017
- The definitions in MiFID II for the contracts entered into after the 03. January 2018.

As a first step, each legal person needs to go through all its trades and identify all financial derivatives among those, as opposed to physical trades. Then one must go through all transactions in financial instruments and separate those traded OTC (over the counter) from those traded on a Regulated Market (i.e. an exchange listed with ESMA) for example Nasdaq Commodities or EEX. This is an important exercise, as it will also be relevant for the implementation of MiFID II in Norway. With a high trading activity, it might make sense to build up an automatic internal trade registration system, which classifies the trades at inception within the correct category.

From the perspective of the Norwegian power sector, EMIR concerns only derivatives and by extension only legal entities that trade derivatives, but also regulates market places trading power derivatives and clearing houses.

What is a derivative according to MiFID II?

Financial instrument	Physical instruments (not in EMIR scope)	"Other" contracts - financial or physical?
• Derivatives • All Emission Allowances (EU ETS compliant) • Emission Allowances Derivatives • Derivatives on Green Certificates	• Spot contracts (ELSPOT trading) • Intraday trading (ELBAS trading) • Contracts for balancing products (both capacity and activation) • Non-standard OTC Green Certificates	• Konsesjonskraft • Long term contracts with physical delivery? • Green Certificates • Contracts connected to the electricity grid (tariffs, losses...) • Brokered "REMIT – contracts" (OTF contracts that must be physically settled)

"Other" contracts

There are some electricity contracts where it is not obvious at the first glance, whether these contracts are financial instruments or physical.

"Konsesjonskraft":

"Konsesjonskraft", "frikraft" and other contracts regulating the use of water are neither financial instruments under MiFID I/II and nor wholesale energy products under REMIT (Regulation for Energy Markets Integrity and Transparency), if they are between the owner of the production unit and the entity owning the water rights. Contrary to both financial instruments and wholesale energy products, these contracts are based on laws and court decisions and resemble taxes and levies. Energy Norway has commissioned Thomessen to do a legal report on that matter, which is attached to this guide. This applies, however, only to the original contract between the power producer and the municipality/region, it does not apply to contracts the municipality/region might enter with third parties to manage their "konsesjonskraft".

Long term contracts with physical delivery and financial elements

Long term contracts with physical delivery, which have a financial element (hedging possibilities determined by the customer, price fixing mechanics, caps and floors…), need to be assessed individually. Each company should establish internal procedures and written internal protocols to go through contracts individually and determine whether they are physical or financial instruments.

Possible questions to ask are amongst others:

- Is the payment obligation in the contract(s) linked to a physical delivery obligation?
- Is the financial element only a price mechanism, which is the counterpart of a physical delivery obligation? For example a fixed price or a fixed price formula or an agreement that the customer can fix the price periodically following certain agreed procedures?
- Does the customer have one contract or two contracts? If there are separate contracts for the physical delivery and the financial hedge (and the second one could be an ISDA contract in addition), the second contract is a financial contract, not a physical contract, despite the physical delivery to the customer under the first contract.

It is possible to have a physical contract with a financial element and keep it as a physical contract. However, if the financial element of a contract becomes dominant, the contract turns into a financial contract, entailing different obligations for both the power company and its customer. In cases of doubt, Energy Norway would recommend:

- That you get own legal advice
- That you evaluate whether your agreements should be re-written or re-structured in order to clearly separate the physical transactions from the transaction in financial instruments, which will fall under EMIR.

Certificates under RES support schemes

Electricity certificates under the common Swedish/Norwegian renewables support scheme and Guarantees of Origin (elserts/ opprinelsesgarantier) are out of scope if they traded bilaterally and non standardised. This is not necessarily the case for certificates, which are traded over an organized venue, or standardized contracts equivalent to contracts traded on an organized venue. These should be considered financial instruments in the light of MiFID II definitions (C10 combined with art: 7.3 and 8 of the Delegated Regulation 2017/565).

However, Stortinget and Riksdagen have decided under the introduction of the support scheme that the electricity certificates (elserts) should not count as financial instruments independent of where they are traded. The status of these certificates remains unclear under MiFID II and a joint decision from the Swedish and Norwegian authorities in the future could be expected to clarify this point.

Contracts connected to the electricity grid

Contracts connected to the electricity grid for example involving tariffication (nettleie) and the recuperation of losses are not financial instruments.

"REMIT contracts"

MiFID II exempts power and gas contracts from the definition of financial instruments under Annex 1, C6: contracts traded on an organized venue (regulated marked, MTF, OTF) are by definition financial instruments, except for wholesale energy products traded on an OTF that "must be physically settled" (the so called REMIT contracts). Criteria as to the definition of "must be physically settled" can be found in Commission Delegated Regulation 2017/565.

Identify your "counterparty status"

For energy traders and utilities, EMIR introduces three categories of companies with different obligations: Financial Counterparties (FC) as defined under MiFID, Non-Financial Counterparties above the Clearing Threshold (NFC+) and Non-Financial Counterparties under the Clearing Threshold (NFC-). Most (if not all) Norwegian utilities and power producers will fall into the NFC– category. This document will hence concentrate on requirements applying to that category. The requirements for the NFC+ or FC category are considerably more challenging.

To define your company's counterparty status the following steps need to be considered:

Definition of Group

Find out, which legal entities are part of your group, which entities trade in financial instruments and which ones have intragroup transactions.

A Group is defined by EMIR in article 2.16. as undertakings consisting of a parent company and its subsidiaries, which are included in a consolidation in accordance with the Accounting Directive or IFRS standards (according to Art.3.3 EMIR)

Calculation of your position towards the clearing threshold

Calculate your position towards the clearing thresholds based on EMIR, art. 10(3) and RTS 149, art 11 and art 10.

The relevant thresholds for Norwegian power companies are stated in RTS 149 art 11 c) to e): 3 billion Euros in gross notional value for OTC interest rate derivative contracts; 3 billion Euros in gross notional value for OTC foreign exchange derivative contracts and EUR 3 billion in gross notional value for OTC commodity derivative contracts. If you are under the threshold, you must have documentation ready on demand to prove that you have performed this assessment and that you have a process in place for periodically reproducing this assessment. Clearing houses and counterparties for example could be interested in knowing your status. If you are close to the threshold you must perform this assessment daily, if you are far away from it, you have to find an appropriate frequency.

NB: when reading the legal texts: the legislation refers to companies below the clearing threshold not as NFC–, but as companies NOT referred to in Article 10 of Regulation (EU) No 648/2012. NFC+ are defined as companies referred to in Article 10 of Regulation 648/2012.

If you fail the test and are above the clearing threshold for any category (interest rates, FX or commodities) you fail all and become an NFC+. This needs to be notified immediately to Finanstilsynet and to ESMA. This threshold, the methodology or rules associated with it could change in the future with changes in EMIR or in RTS 149.

How do you calculate your gross notional value in relation to the threshold?

You calculate the value of the overall outstanding positions of your group in OTC Derivatives (Volume multiplied by Contract Price) and subtract the value of risk reducing positions in OTC derivatives (Volume multiplied by Contract Price). Compare the resulting number to the respective clearing threshold.

OTC traded derivatives, that are immediately after given up to clearing (for example traded via a broker and immediately after given up to Nasdaq for processing and clearing) do not count into the threshold calculation. They are treated like exchange trade contracts, according to OTC Question 1 d) in the ESMA Q and A for EMIR: "Derivatives transactions, such as block trades, which are executed outside the trading platform of the regulated market, but are subject to the rules of the regulated market and are executed in compliance with those rules, including the immediate processing by the regulated market after execution and the clearing by a CCP, should not be regarded as OTC derivatives transactions.

Therefore, these transactions should not be considered for the purpose of the clearing obligation and the calculation of the clearing threshold by NFC that only relates to OTC derivatives.

Derivatives transactions that do not meet the conditions listed in the first paragraph of this sub answer (d) should be considered OTC. For example, derivatives contracts that are not executed on a regulated market and are not governed by the rules of an exchange at the point of execution should be considered OTC even if after execution they are exchanged for contracts traded in a regulated market. However, the replacement contract itself may be considered exchange traded if it meets the relevant conditions."

How do you define risk reducing?

EMIR's definition of risk reducing is important, since it is not only used in the EMIR threshold calculation but also in certain future calculation you will be forced to perform under MiFID II. Therefore, it is necessary to have established a proper documented process within the company of why certain trades are considered to be hedging or part of a hedging strategy as opposed to speculation.

EMIR's definition of hedging is very wide and can fit almost any situation; it is not identical with the definition used in the international accounting standards. This gives the opportunity for each company to follow their own hedging strategies, as long as they are internally consistent, documented and reproducible by third parties if needed. Again, it might make sense to establish an automatic way of qualifying a trade as hedging or as speculation, to make the repeated performance of the EMIR calculations easier.

The definition of risk reducing transaction is found in RTS 149 art 10:

"1. An OTC derivative contract shall be objectively measurable as reducing risks directly relating to the commercial activity or treasury financing activity of the non-financial counterparty or of that group, when, by itself or in combination with other derivative contracts, directly or through closely correlated instruments, it meets one of the following criteria:

(a) it covers the risks arising from the potential change in the value of assets, services, inputs, products, commodities or liabilities that the non-financial counterparty or its group owns, produces, manufactures, processes, provides, purchases, merchandises, leases, sells or incurs or reasonably anticipates owning, producing, manufacturing, processing, providing, purchasing, merchandising, leasing, selling or incurring in the normal course of its business;

(b) it covers the risks arising from the potential indirect impact on the value of assets, services, inputs, products, commodities or liabilities referred to in point (a), resulting from fluctuation of interest rates, inflation rates, foreign exchange rates or credit risk;

(c) it qualifies as a hedging contract pursuant to International Financial Reporting Standards (IFRS) adopted in accordance with Article 3 of Regulation (EC) No 1606/2002 of the European Parliament and of the Council (1). "

Once MiFID II and connected delegated regulation comes into force, the definition of risk reducing will not change, but there are more formal descriptions how you have to build up you company internal hedging strategies and portfolio. ***These can be found in RTS 20 / Commission delegated regulation (EU) 2017/592, Article 5.2.:***

"2. For the purposes of paragraph 1, a qualifying risk-reducing transaction taken on its own or in combination with other derivatives is one for which a non-financial entity:

(a) describes the following in its internal policies:

(i) the types of commodity derivative, emission allowance or derivative thereof contracts included in the portfolios used to reduce risks directly relating to commercial activity or treasury financing activity and their eligibility criteria;

(ii) the link between the portfolio and the risks that the portfolio is mitigating;

(iii) the measures adopted to ensure that the transactions concerning those contracts serve no other purpose than covering risks directly related to the commercial activity or the treasury financing activity of the non-financial entity, and that any transaction serving a different purpose can be clearly identified;

(b) is able to provide a sufficiently disaggregate view of the portfolios in terms of class of commodity derivative, emission allowance or derivative thereof, underlying commodity, time horizon and any other relevant factors."

Although this requirement will formally only become necessary after MiFID II RTS 20 comes into force in Norway, in order to streamline compliance efforts, we would recommend companies to document their hedging approach in a way not only compatible with EMIR, but also with MiFID II.

Implement Risk MitigationTechniques

EMIR's purpose is to reduce the risk of OTC derivatives trading; therefore a big share of the requirements covers risk mitigation techniques.

Timely exchange of confirmations

Ensure that you exchange trade confirmations with each of your counterparties within the respective deadlines, in writing and electronically where possible. The relevant deadlines for contract types can be found in RTS 149 Art 12,2.

This requirement means that you should build up a systematic approach within your company, ideally based on exiting back office procedures for new contracts, review and eventually adapt confirmation clauses in your existing open agreements and/or agree on "silent confirmation clauses". Establish documentation in your company about your procedures for exchanging confirmation.

Reconciliation and dispute resolution

Companies are required to set up a process to exchange and match key features of all open OTC derivative transactions with each specific counterparty. This requirement is based on EMIR art 11, 1b) and RTS 149 art 13, 3 b). Such a procedure needs to be set up with each counterparty for OTC derivatives before trading. Portfolio reconciliation needs to happen once per quarter, if you have more than 100 outstanding contracts with an individual counterparty or once per year if you have 100 or less outstanding contracts with an individual counterparty.

In addition, you have to establish dispute resolution procedures with each counterparty before trading. This requirement is based on EMIR art 11, 1b) and RTS 149 Art 15.

In practice that means that your company needs to establish internal procedures and schedules for the portfolio reconciliation and agree on the procedures and timing with each counterparty. The same goes for dispute resolution procedures. For both, reconciliation and dispute resolution, there are existing standard solutions that can be used for example via adherence to the ISDA Protocol or bilaterally via EFET or ISDA agreements (Links are in the relevant chapter).

Portfolio Compression

Companies are required to set up portfolio compression procedures for those counterparties, with whom they have more than 500 outstanding contracts according to EMIR Art 11 1b) and RTS 149 art 14. If that is the case, the two counterparties are expected to perform portfolio compression at least twice a year. It is however possible for a company to decide that a portfolio compression exercise is not appropriate. In such a case, this decision needs to be carefully documented with evidenced and valid reasons not to perform portfolio compression such as VAT issues, close-out netting as risk mitigation etc.

Implementation of the reporting requirement

Risk reduction of OTC derivatives trading requires information about the existing contracts, therefore EMIR article 9 1. requires that companies report all derivative transactions, both exchange traded and OTC, to a registered trade repository (TR). RTS 148 and ITS 1247/2012 specify what data needs to be reported and how. Companies need to report their transaction data in the proper format to a TR within one business day either directly or via a third party.

Finanstilsynet expects reporting in the Norwegian electricity sector to start from 1 January 2018. Since EMIR comes into force 1 July 2017 that means, that all derivatives still outstanding on 1 July 2017 and those entered into between 1 July 2017 and 1 January 2018 need to be reported as well.

EU countries will have implemented a new reporting standard with 120 fields from November 2017. Given Finanstilsynet's expectations as to compliance, we recommend Norwegian firms to apply the new reporting standard only. The new standard table can be found as an annex to Commission Delegated Regulation EU 2017/104.

The reporting requirement is probably the most complicated requirement to implement, so it is most effective to start preparations now. Different reporting solutions can be good for different companies so rather than suggesting one model of how you should organize your reporting, this guide sets out several questions you should ask when looking for a good reporting solution for your company. Keep in mind that reporting is also a major IT project.

Last but not least: reporting of derivative transaction regarding electricity under EMIR is considered sufficient to meet the reporting obligation of financial wholesale energy products transactions under REMIT, the Regulation of Energy Markets Integrity and Transparency, once it is implemented in Norway. That applies even if reporting formats and destinations are different.

Before getting started, here come some answers to the most frequent questions:

- Automated solutions are necessary, since detailed reporting is required within one business day. If it is possible, try to match the internal system with the reporting fields.

- Modifications to existing contracts also need to be reported, they are so called "life cycle events".

- All derivative transactions need to be reported by both parties of the transaction, although any party can choose to delegate the reporting obligation to its counterparty or to a third party. This is necessary to keep in mind if you have OTC derivatives with a medium sized end-consumer or non-professional small scale producers.

- Each party is responsible for the quality of the data reported: i.e. the responsibility stays with you even if you choose to report via a third party.

- Intragroup transactions, if they are OTC derivatives, need to be reported as well, as soon as they are between two legal entities within one group. If there are no separate legal entities within the group involved in the trade but just departments within one legal entity, the intragroup trade does not need to be reported.

- Experience from Sweden: small companies choose to report via services offered by Nasdaq, i.e. a third party, which is part of the Nasdaq Group. Only the big companies report directly to a trade repository.

- It is allowed to combine reporting solutions: report some of your own OTC derivatives, and delegate the rest of the reporting to a Regulated Market, another third party or to a counterparty.

It is also important to keep in mind that the European Commission has proposed a revised EMIR in May 2017 (EMIR recast or EMIR II). The current proposal can imply some simplification of the reporting requirements for non-financial counterparties. It suggests removing the obligation to report intragroup transactions and to introduce single-sided reporting of exchange traded derivatives, where the reporting entity should be the clearing house.

Identify yourself – get a global Legal Entity Identifier

Reporting trades requires a unique number for your company, which follows the same rules worldwide, the global Legal Entity Identifier or LEI. You have to get an LEI number, which has to be maintained yearly. There is currently no Norwegian registry offering this service, since the Brønnøysundregister stopped doing so, but there are various European and American companies offering this service. The Global Legal Entity Identifier Foundation - link in the relevant chapter- has a comprehensive list of companies providing LEI services. This guide provides two links attached to specific companies: to one company offering their services in the Nordic countries in local currencies and to another company in Germany, being the biggest company in Europe offering those services.

Direct reporting to a trade repository or delegated to a service provider or both?

Here comes a list of questions to guide you to find the right reporting solution for your company:

- How big is the number of exchange traded contracts compared to number of OTC contracts your company trades?

A high number of exchange traded contracts versus a low number of OTC contracts could make it interesting to report via the third party services providers instead of setting up an own link to a trade repository. Some exchanges, for example Nasdaq, also offer reporting solutions within their group concerning "remaining" OTC contracts to their customers that report exchange traded contracts via them. It could also make sense to agree with the counterparty that the counterparty reports OTC contracts.

- Do you have derivative contract with banks (for example interest rate/exchange rate hedges)?

You could ask the bank to do the reporting for you (since the bank will have established a direct link to the trade repository) or you could choose to report those directly/via another third party.

- How do you handle intragroup transactions?

Intragroup derivative transactions between entities with different LEIs need to be reported. Discuss company internal solutions, so that there are internal agreements on which unit reports one or both sides of the trade.

- How do you handle financial derivative transaction with non-professional end-consumers or small scale producers?

You could report on behalf of that customer or the customer has to establish its own reporting solution.

- How is your trading activity organized? Is one entity within your group trading with parties outside the company, or do several entities have derivative contracts with parties outside your company?

Discuss and establish a solution that works for your company, either delegating all reporting to one entity within the company, establish one reporting channel for several entities to use or specific reporting channels for each entity.

- How to find the right trade repository/ third party reporting provider?

ESMA has published a list of registered trade repositories, so go to the link in the relevant chapter and compare. Ask your market places/banks what reporting services they could recommend and compare.

- How do you generate a Unique Trade Identifier – UTI:

External provider such as brokers or exchanges usually provide UTIs. There are also public algorithms available. One algorithm used by the power sector is for example by ISDA or by EFET: http://uti.efetnet.org/uti/, which is made for commodities.

- Other questions?

Useful Links

Finanstilsynet

Finanstilsynets page on EMIR

https://www.finanstilsynet.no/tema/emir/

Article on implementation of EMIR

https://www.finanstilsynet.no/nyhetsarkiv/nyheter/2017/ikraftsettelse-av-emir/

Legislation

EMIR

http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32012R0648&from=EN

RTS 149

http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:052:0011:0024:en:PDF

RTS 148

http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:052:0001:0010:en:PDF

Commission Implementing Regulation (EU) No 1247/2012

http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32012R1247&qid=1506514225903&from=EN

Commission Delegated Regulation EU 2017/104 – new reporting standards

http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017R0104&qid=1506513633584&from=EN

MiFID II

http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32014L0065&from=EN

MiFID II – definition of financial instrument

http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32017R0565

MiFID II – hedging definition/ancillary activitiy RTS 20

http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32017R0592

ESMA Q&A concerning EMIR

https://www.esma.europa.eu/sites/default/files/library/esma70-1861941480-52_qa_on_emir_implementation.pdf

ESMA on trade reporting

https://www.esma.europa.eu/policy-rules/post-trading/trade-reporting

Risk mitigation and dispute resolution

EFET Risk Mitgiation Techniques Agreement:

http://www.efet.org/Standardisation/Legal-EFET-Standard-Contracts-and-Documentation/EMIR

ISDA PR-DR protocol:

http://www2.isda.org/functional-areas/protocol-management/faq/15/

ISDA amendment agreement PR DR

http://www2.isda.org/emir/pae/2

LEI

Homepage of the global LEI Foundation

https://www.gleif.org/en/

List of the global LEI Foundation regarding LEI issuing organizations

https://www.gleif.org/en/about-lei/how-to-get-an-lei-find-lei-issuing-organizations

Link to the LEI provider, which offers services in Norwegian

http://no.nordlei.org/

Link to the biggest LEI provider in Europe

https://www.wm-leiportal.org/?lang=en

UTI-generator

http://uti.efetnet.org/uti/

https://www.utiprefix.org/login/

ESMA

ESMA's list of registered trade repositories:

https://www.esma.europa.eu/supervision/trade-repositories/list-registered-trade-repositories

ESMA list of Regulated Markets:

https://registers.esma.europa.eu/publication/searchRegister?core=esma_registers_mifid_rma

ESMA Q&A concerning EMIR

https://www.esma.europa.eu/sites/default/files/library/esma70-1861941480-52_qa_on_emir_implementation.pdf

ESMA on trade reporting

https://www.esma.europa.eu/policy-rules/post-trading/trade-reporting