

Client Convenient Solution (CCS)

RRS Release 2.0

Transaction Reporting

Participant Simulation Guide

Frankfurter Wertpapierbörse (FWB[®], the Frankfurt Stock Exchange)
Eurex Deutschland

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Abstract

This document describes the timeline and enhancements as for the Client Convenient Solution (CCS) RRS Release 2.0 Simulation. Trading participants should use this document to plan and prepare their Client Convenient Solution (CCS) RRS Release 2.0 Simulation participation. This document should be read alongside the Client Convenient Solution (CCS) RRS Release 2.0 Release Circular and the Simulation Calendar.

RRS Technology

Internal reporting solution – Regulatory Reporting Solution (RRS) – is a technical infrastructure to comply with Article 26(5) MiFIR to the Trading Venues. RRS provides an extract of the reportable transactions of Non-MiFIR participants of Eurex or FWB and allows the participants to:

- enrich or correct the fields not known to the Trading Venue or
- to send independently all transaction data which the Trading Venue requires by referencing each transaction.

History

Version	Date	Reason
1.2	03.11.2025	Introduction for Client Convenient Solution (CCS) RRS Release 2.0

List of Abbreviations

Article 26(5)	“The operator of a trading venue shall report details of transactions in financial instruments traded on its platform which are executed through its systems by a firm which is not subject to this Regulation in accordance with paragraphs 1 and 3.”
CCS	Client Convenient Solution
CET	Central European Time
CRE	Common Report Engine
CTS	Customer Technical Support
CUE	Common Upload Engine
DBAG	Deutsche Börse AG
MIFID	Markets in Financial Instruments Directive
NCA	National competent authorities
Non-MiFIR	Trading Participants outside of the scope of MiFIR regulation
RRS	Regulatory Reporting Solution
SCLC	Short Code Long Code (Short Code and Algo ID solution)
SPoC	Single Point of Contact
T7	T7 trading system developed by Deutsche Börse Group

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1 Simulation Overview

1.1 Introduction

The purpose of Client Convenient Solution (CCS) RRS Release 2.0 Simulation is to provide an opportunity for participants to become familiar with the enhanced technical setup of Client Convenient Solution (CCS) RRS Release 2.0 and to prepare for production.

The key objectives of the CCS RRS Release 2.0 Simulation:

- Provision of high-quality information and simulation to support participant readiness.
- Early identification of issues both from the Exchange and from the participants' side to minimize risk of CCS RRS Release 2.0 launch and production operation.

The CCS RRS Release 2.0 Simulation covers both the cash and the derivatives markets, which means all markets are set up in the RRS Simulation environment. The CCS RRS Release 2.0 Simulation always includes all the environments described above, unless explicitly stated otherwise.

1.2 Further Information

Please note and be aware of the following CCS RRS Release 2.0 Simulation condition:

Following a release, the environment will be available with the current software for further testing of all RRS related functionality.

1.3 Intended audience

This document serves as the guide for all simulation participants, i.e., current, and future users of the RRS system. In particular, the following participants will be involved in the simulation:

- Non-MiFIR Exchange trading participants

In order to achieve a common understanding of the responsibilities and tasks, the distribution of this Simulation Guide to the appropriate project teams and line organizations is recommended as soon as possible. All parties involved, e.g. central coordinators, system administrators, traders, should be aware of their tasks before the start of the Simulation.

1.4 Timeline

The following timeline gives an overview of the introduction schedule for RRS releases in 2025 & 2026:

CCS RRS Release 2.0 Simulation Execution	1 st of December 2025 - onwards
CCS RRS Release 2.0 Production Launch	16 th of March 2026

1.5 Simulation Calendar

The Simulation Calendar for the derivatives and cash markets is available under the following paths, respectively:

Eurex:

eurex.com > Support > Initiatives & Releases > Simulation Calendar

Xetra:

xetra.com > Trading > Trading calendar and trading hours

1.5.1 Guiding principles for Simulation Calendar

- The Simulation will be set up and run from both a functional and technical perspective as Production-like as possible to help simulate business processes under realistic conditions. In order to provide a Production-like system environment, the RRS and SCLC Business Service applications will be integrated in the Simulation environment. Nevertheless, system availability and technical performance will be scaled to Simulation requirements and will differ from production.
- RRS Release 1.7 permanent Simulation will be terminated with the plan start of CCS RRS 2.0 Simulation on the 1st of December 2025.
- The CCS RRS Release 2.0 Simulation is planned to start on 1st of December 2025 and will last until further notice. The last Venue Extract File for the Software version 1.7 will be available on Thursday 27th of November 2025. The last day of Production before CCS RRS Release 2.0 will be communicated in due time.
- Please be advised that members should not upload any TVUPL files to RRS and SCLC files to the CUE between Thursday 27th of November 23:30 CEST and Monday 1st of December 23:59 CEST.
- The CCS RRS Release 2.0 Simulation will last until further notice.
- The first batch days in Simulation for CCS RRS Release 2.0 will be during the first week of December, on Tuesday 2nd of December, Wednesday 3rd of December and Thursday 4th of December.
- On batch days, calendar days correspond to actual business days. The following days until the next batch day have the business date of this forthcoming batch day. Here several calendar days (with 24 hours trading availability) may constitute one business day.
- Weekends are generally open for Simulation, but no technical and functional support will be available.

2 Functional Enhancements

The introduction of CCS RRS Release 2.0, the following enhancements shall be introduced:

- New personal Data Fields (First Name, Surname, Date of Birth) in SCLC Business Service
- Dedicated Upload Channel via CUE (EXTREFNM)
- These updates will be accompanied by the new XSDs (introduced already with T7 release 14.0 in simulation and production), which all Trading Participants must adopt to ensure compatibility with the revised reporting formats.
- TR160 will include new error codes:
 - Error Code 50 – Invalid Value in DateOfBirth
 - Error Code 51 – Invalid Value in FirstName
 - Error Code 52 – Invalid Value in SurName
 - Error Code 53 – Incomplete Personal Data
- TR161 will be enhanced with new fields:
 - FirstName
 - Surname
 - DateOfBirth

Details on the existing RRS functionalities and the list of known limitations are communicated to the participants in the form of two CCS RRS Release 2.0 Release Circulars, directed at the Eurex and Xetra customer base respectively:

Eurex:

www.eurex.com > Rules & Regs > Regulation > MiFID II/MiFIR > Reporting

Xetra:

www.xetra.com > Newsroom > Current regulatory topics > MiFID II and MiFIR

3 Simulation preparation

Preparation activities should be completed prior to the start of CCS RRS Release 2.0 Simulation.

3.1 Organizational preparation

Prior to the start of CCS RRS Release 2.0 Simulation, to simulate the individual requirements participants are encouraged to define specific simulation objectives and scenarios on their own as an organisational preparatory activity to ensure readiness for the simulation phase.

3.2 Functional preparation

Participants planning to participate in the simulation should verify their individual setup and inform the exchange of any changes that may be required prior to the start of their simulation testing activity.

3.3 Technical preparation

To ensure technical readiness for simulation, trading members should consider the following topics:

- A technical connection to T7, CRE and CUE systems need to be established (if not existing).
- Familiarize themselves with the graphical user interface (GUI) of the ShortCodeLongCode Business Service (SCLC) application, ensuring they understand its functionality and navigation prior to simulation activities.
- Identify and confirm the needed internal resources for the installation of the simulation software.
- Ensure related in-house systems are configured to support simulation of subsequent processing activities.

3.4 Reporting process overview

The Charts below illustrate on a high level the general architecture and reporting process chain offered by Client Convenient Solution (CCS) RRS Release 2.0.

Please note that the data in the historical file TVUPL500 should be uploaded earliest on T+2 for trade date T.

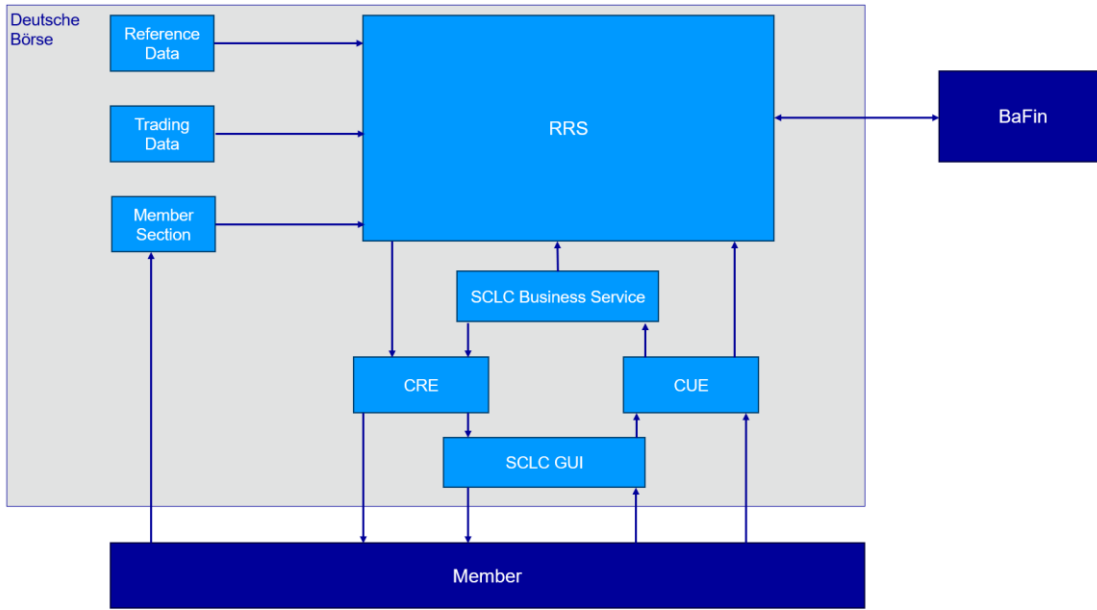


Figure 1: General Architecture

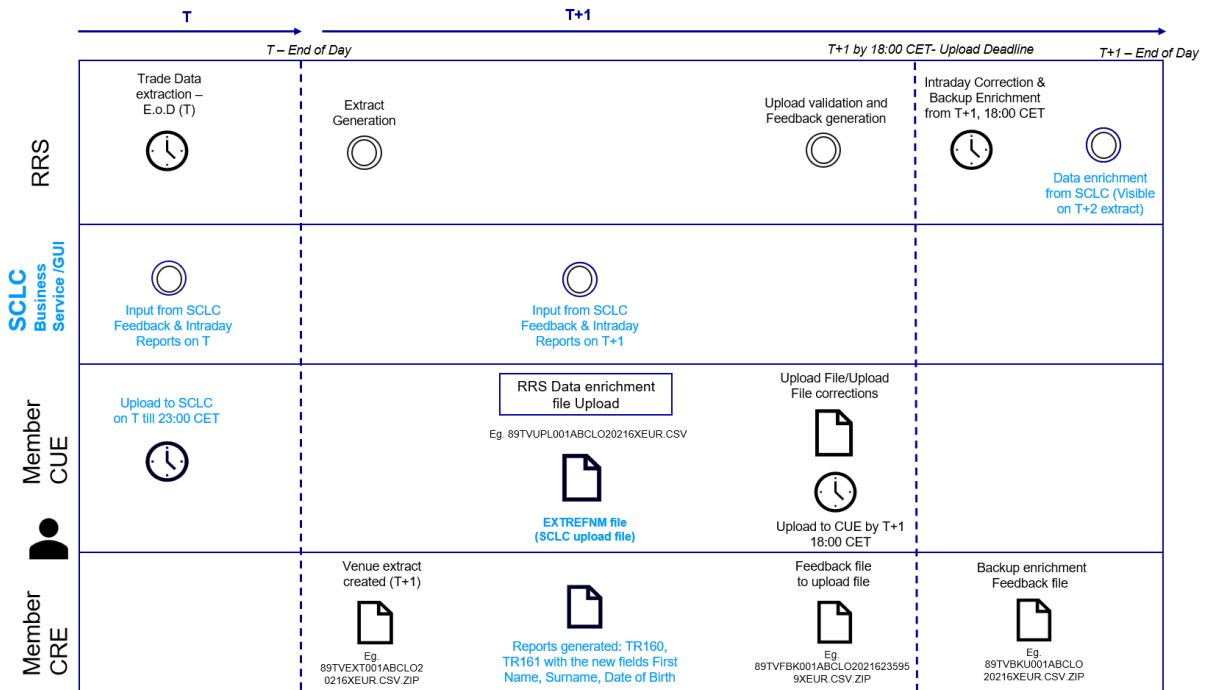


Figure 2: Trading Venue Transaction Reporting process

3.5 Recommended test scenarios to be executed by participants

The following test scenarios can be executed anytime by participants in Simulation. There are no special tasks to be performed by the Exchange.

3.5.1 Testing of End-to-End Short Code/Long Code Registration and Correction Behavior.

Participants are encouraged to validate the correct registration of Short Codes (SC) and Long Codes (LC) and observe correction behavior in the RRS extract and feedback files. This scenario also supports testing of joint account handling.

Test scenario 1:

Fully positive test scenario

Step 1: The non-MiFIR participant registers a new Short Code (SC) for a natural person on trade date T in the ShortCodeLongCode application, ensuring all required and optional fields are correctly filled, including first name (FN), surname (SN), and date of birth (DOB). The participant verifies on T+1 that the data is correctly mapped in the extract and appears correctly in the outbound.

Step 2: On T, the participant uploads a complete and correct EXTREFNM file containing the valid SCLC registration and executes an agency trade using the registered SC.

Step 3: On T+1 (after the first available Simulation Batch), the participant verifies the following:

- TVEXT file reflects correct mapping of LC and personal data.
- TR160/TR161 reports show no errors, confirming valid SC-LC registration.
- TVBKU file indicates UPLOAD_STATUS = no upload needed.

Note: Verification of record validity can be performed via backup enrichment. The status will consistently show “no upload needed” for records that are correct in SCLC Business Service and properly mapped in RRS. This scenario may also be used to test joint accounts.

Test scenario 2:

Joint accounts- Positive scenario

Step 1: The non-MiFIR participant executes an agency trade using a registered SCLC (type N).

Step 2: On T+1 (after the first available Simulation Batch), the participant uploads (RRS TVUPL) multiple records with the same TVTIC identifier and sequential SEQUENCE_NUM values [0, 1, 2] in the TVUPL file, according to Trading Venue File Specs. Each record must include correctly filled ID fields, including First Name, Surname, and Date of Birth in case of ID = National ID.

Step 3: On T+1 (intraday), the participant verifies the following:

- TVFBK file returns no errors.
- TR160/TR161 reports show no error entries, confirming valid SCLC mappings.
- TVBKU file indicates UPLOAD_STATUS = valid and complete upload.

3.5.2 Testing of Rejection Behavior and Correction Handling in Short Code/Long Code Registration

Participants are encouraged to test the system’s rejection logic by submitting records with missing or invalid data. These scenarios help validate fallback behavior, error reporting, and correction workflows in both SCLC Business Service and RRS.

Test scenario 1: No SCLC Registration Upload on T, Correction on T+1 before 18:00 CET

Step 1: On trade date (T), the non-MiFIR participant executes an agency trade using a Short Code (SC) that has not yet been registered.

Step 2: On T+1 (before 18:00 CE(S)T)

Step 2a: The participant uploads a valid record for the missing SC via an EXTREFNM file in the SCLC Business Service.

Step 2b: The participant performs checks in TVEXT.

Step 3: The participant verifies the following:

- TVEXT file on T+1 shows “SC not found” for the field(s) in which the unregistered record has been used (e.g. SC 123 (not registered on T) used for Client ID in order entry for a buy trade --> Buyer ID = SC not found) and respective MISSING flag = Y

- TR160 report on T includes errorCode = 1, indicating SC registration is missing.

- TR161 report on T+1 confirms the subsequent valid SC-LC registration with StatusIndicator = N (new registration).

- TVBKU file on T+1 indicates UPLOAD_STATUS = no upload needed, and no MISSING flag is populated (this indicates that the record has been successfully corrected with the automatic SCLC Business Service mapping in RRS).

Test scenario 2: SCLC rejected Registration of Invalid Personal Data on T (Complete rejection of SCLC registration) and record marked as “final missing”.

Step 1: On trade date (T), the participant uploads an EXTREFNM file with Classification Rule “L” containing a Legal Entity Identifier (LEI) and a valid birthdate (which is invalid for legal entities). Trades are executed using this SC.

Step 2: The participant verifies the following:

- TVEXT file on T+1 shows “SC not found” due to invalid personal data for LEI for the field(s) in which the unregistered record has been used (e.g. SC 123 (not registered on T) used for Client ID in order entry for a buy trade --> Buyer ID = SC not found) and respective MISSING flag = Y.

- TR160 report includes:

- errorCode = 50 → Invalid value in Date Of Birth

- errorCode = 1 → SC registration missing

- TR161 report does not contain the rejected record
- TVBKU file indicates UPLOAD_STATUS = final missing and respective MISSING flag = Y.

- TR166 report on T+1 lists the record as “final missing”.

Test scenario 3: SCLC Registration with National ID Type and Empty Birthdate (Complete rejection of SCLC registration)

Step 1: On trade date (T), the participant uploads an EXTREFNM file with ClassificationRule = N (National ID), valid SC and LC, and valid first name (FN) and surname (SN), but populates the field DateofBirth (DOB) with a value in the wrong format. Trades are executed using this SC.

Step 2: The participant verifies the following:

- TVEXT file on T+1 shows “SC not found” for the field in which the unregistered record has been used (e.g. SC 123 (not registered on T) used for Client ID in order entry for a buy trade --> Buyer ID = SC not found) and respective MISSING flag = Y.

- TR160 report includes:

- errorCode = 50 → Invalid value in Date Of Birth

- errorCode = 1 → SC registration missing

- TR161 report does not contain the rejected record.

- TVBKU file indicates UPLOAD_STATUS = final missing and respective MISSING flag = Y.

- **Optional:** TR166 report on T+1 lists the record as “final missing”.

Test scenario 4: No SC Uploaded at All, No Correction

Step 1: On trade date (T), the participant executes a trade using an unregistered SCLC mapping and does not perform any correction upload.

Step 2: The participant verifies the following:

- TVEXT file on T shows “SC not found” for the field(s) in which the unregistered record has been used (e.g. SC 123 (not registered on T) used for Client ID in order entry for a buy trade --> Buyer ID = SC not found) and respective MISSING flag = Y.

- TR160 report includes errorCode = 1 → SC registration missing.
- TR161 report does not contain the rejected record.
- TVBKU file indicates UPLOAD_STATUS = final missing and respective MISSING flag = Y.
- NCA file falls back to “Max Mustermann”.
- TR166 report on T+1 lists the record as “final missing”.

3.5.3 Testing of SCLC Registration with Missing Optional Personal Data

Participants are encouraged to test the behavior of the system when optional personal data fields are omitted during SCLC registration. This scenario helps validate fallback logic, missing flags in the extract, and correction handling within production-like timing.

Test scenario 1: Valid SC with ClassificationRule = N but Empty Personal Data

Step 1: On trade date (T), the non-MiFIR participant uploads an EXTREFNM file containing a valid SC, LC and ClassificationRule = N, but omits optional personal data fields: First name, Surname, and Date of Birth. A trade is executed using the registered SC.

Step 2: The participant verifies the following:

- TVEXT file on T shows that Buyer/Seller ID Type and Buyer/Seller ID are correctly mapped, but personal data is missing. The Missing Flag = Y is set.

- TR161 report on T confirms valid SC-LC registration.
- TVBKU file indicates UPLOAD_STATUS = final missing.

Optional Step 3: To simulate production timing, the participant may enrich the record by uploading a corrected EXTREFNM file via SCLC Business Service before T+1 18:00 CEST. If the correction is successfully validated, the expected UPLOAD_STATUS in TVBKU shall be updated to no upload needed and the missing flags are removed. Known Limitations for Simulation

Participants should be aware and respect the limitations in the Simulation environment.

3.6 Known Limitation in terms of capacity

The RRS Simulation is not designed for very extensive or even performance testing.

The CUE Upload directories can only support and process 5 parallel file uploads with a maximal joint size of 50 MB. Participants should refrain from uploading more than 5 files and should comply with the files size limitation. The fact dates used in historical correction (TVUPL500 file) are limited to max 50 distinct fact dates. Additional fact dates beyond that will not be supported by the RRS Simulation environment.

4 Contact

For technical support please contact Customer Technical Support (CTS), which is available 24/5, from Monday 00:00 to Friday 22:00 CET:

- Technical Key Account Manager (TKAM) via dedicated phone number

- CTS via hotline +49 69 211 10 888 or by email at cts@deutsche-boerse.com

For functional support please contact the Regulatory Reporting Analysts, which are available from Monday to Friday between 8:30 and 17:30 CET/CEST:

- Regulatory Reporting Analyst via hotline +49 69 211 28991
- Regulatory Reporting & Monitoring Team by email at mifid.reporting@deutsche-boerse.com