



Reporting Obligations
according to MiFID II/MiFIR

Version:1.0

10 March 2020

General Information

According to Article 58 of the Markets in Financial Instruments Directive 2014/65/EU ("MiFiD II") it is provided:

"1. ... that a market operator operating a trading venue which trades commodity derivatives or emission allowances or derivatives thereof:

(a) make public a weekly report with the aggregate positions held by the different categories of persons for the different commodity derivatives or emission allowances or derivatives thereof traded on their trading venue, specifying the number of long and short positions by such categories, changes thereto since the previous report, the percentage of the total open interest represented by each category and the number of persons holding a position in each category in accordance with paragraph 4 and communicate that report to the competent authority and to ESMA; ESMA shall proceed to a centralised publication of the information included in those reports;

(b) provide the competent authority with a complete breakdown of the positions held by all persons, including the members or participants and the clients thereof, on that trading venue, at least on a daily basis.

3. ... members or participants of regulated markets, MTFs and clients of OTFs to report to the investment firm or market operator operating that trading venue the details of their own positions held through contracts traded on that trading venue at least on a daily basis, as well as those of their clients and the clients of those clients until the end client is reached."

Moreover, pursuant to Article 26 of Regulation (EU) No. 600/2014 of 15 May 2014 on Markets in Financial Instruments ("MiFiR"):

"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.

3. ... For commodity derivatives, the reports shall indicate whether the transaction reduces risk in an objectively measurable way in accordance with Article 57 of Directive 2014/65/EU."

HEnEx SA ("HEnEx") operates a Regulated Market as defined in Article 4.1(21) of MiFiD II Directive.

Athens Stock Exchange SA ("ATHEX") is authorized from the Hellenic Capital Market Commission ("HCMC") as an Approved Reporting Mechanism (ARM). HEnEx will perform the transaction reporting through ATHEX.

HEnEx SA ("HEnEx") requires its trading members to contribute to its own reporting requirements as set forth by the Financial Energy Market Rulebook (Derivatives Market), and MiFiD II/MiFiR provisions.

REPORTING PARTICIPANT INFORMATION	
Company Name:	
Country:	
Registered Seat Address:	
LEI Code:	
Regulatory status:	<input type="checkbox"/> Investment Firm <input type="checkbox"/> Non-Investment Firm
RESPONSIBLE PERSON FOR MiFiD II/MiFiR SERVICES	
Name of Contact Person:	
Telephone No.:	
Mobile No.:	
Fax No.:	
e-mail address:	

We undertake to directly inform HEnEx in case of any change occurred in the information as declared herein.

SIGNED ON BEHALF OF THE REPORTING PARTICIPANT BY ITS LEGAL REPRESENTATIVE	
Name:	
Position:	
Date:	

TABLE 1 - TRANSACTION REPORTING FIELDS¹

DECISION MAKER FOR TRADER	
<i>Default setup of a decision maker within company for the purpose of MiFiR Transaction Reporting</i>	
Name of the Decision Maker:	
Date of birth of the Decision Maker:	
Nationality of the Decision Maker:	
National ID type and number of the Decision Maker according to 2017/590 Delegated Regulation (RTS22)	
Short code of the decision maker (optional, if no preference, HEnEx will generate short code)	

We undertake to directly inform HEnEx in case of any change occurred in the information as declared herein.

SIGNED ON BEHALF OF THE REPORTING PARTICIPANT BY ITS LEGAL REPRESENTATIVE	
Name:	
Position:	
Date:	

¹ only for entities under article 1.2.1 (1b) of HEnEx's Financial Energy Market Rulebook (Derivatives Market) - any company engaged in energy related activity

TABLE 2 - POSITION REPORTING FIELDS²

DEFAULT SETUP FOR FIELDS OF COMMISSION IMPLEMENTING REGULATION (EU) 2017/1093-TABLE 2

FIELD	DETAILS TO BE REPORTED	DATA REPORTING	FORMAT FOR REPORTING	COLUMN LENGTH	VALUE TO BE USED FOR REPORTING
Entity Type	Reporting Participant Entity Type	COMUND Commercial Undertakings Or INFIRM Investment Firms or credit Or institutions Or INFUND Investment Funds Or OFININ Other Financial Institutions Or OPCMPL Operators with compliance obligations under Directive 2003/87/EC	VARCHAR2	24	
Reporting Entity Notation	Reporting Entity Notation type	'LEI' or 'NINDN' or 'CONCAT' or 'CCPT'	VARCHAR2	24	
Reporting Entity ID	The identifier of the reporting investment firm. Field to be populated with the Legal Entity Identifier code (LEI) for legal entities or {NATIONAL_ID} for natural persons not having an LEI.	{LEI} or {NATIONAL_ID} — Natural persons	VARCHAR2	140	
Position holder Notation	Position holder Notation type	'LEI' or 'NINDN' or 'CONCAT' or 'CCPT'	VARCHAR2	24	

² For all eligible Trading Members of HEnEx as of article 1.2.1 (1) of HEnEx's Financial Energy Market Rulebook (Derivatives Market)

Position holder ID	Field to be populated with the Legal Entity Identifier code (LEI) for legal entities or {NATIONAL_ID} for natural persons not having an LEI. (Note: if the position is held as a proprietary position of the reporting firm, this field shall be identical to field 'Reporting entity ID').	{LEI} or {NATIONAL_ID} — Natural persons	VARCHAR2	140	
Email address of position holder	Email address for notifications of position- related matters.	{ALPHANUM-256}	VARCHAR2	1024	
Ultimate Parent Notation	Ultimate Parent Notation type	'LEI' or 'NINDN' or 'CONCAT' or 'CCPT'	VARCHAR2	24	
Ultimate parent entity ID	Identifier of the ultimate parent of the position holder when positions of group entities are aggregated. Legal Entity Identifier code for legal entities or NATIONAL_ID for natural persons not having an LEI. This field may be identical to "Reporting Entity ID" or "Position Holder ID" if the ultimate parent holds its own positions or makes its own reports.	{LEI} or {NATIONAL_ID} — Natural persons	VARCHAR2	140	
Email address of ultimate parent entity	Email address for correspondence in relation to aggregated positions.		VARCHAR2	1024	
Parent of collective investment scheme status	Field to report on whether the position holder is a collective investment undertaking that makes investment decisions independently from its parent as set out by Article 4(2) of the	'TRUE'—the position holder is a collective investment undertaking that makes independent investment decisions 'FALSE'— the position holder is	VARCHAR2	20	

	Commission Delegated Regulation (EU) 2017/591(1).	not a collective investment undertaking that makes independent investment decisions			
Delta equivalent position quantity	If the Position Type is 'OPTN' or an option on 'EMIS', then this field shall contain the delta-equivalent quantity of the position reported in the 'Position Quantity' field. This field should be populated with a positive number for long calls and short puts and a negative number for long puts and short calls.		NUMBER	22	
Indicator of whether the position is risk reducing in relation to commercial activity.	Field to report whether the position is risk reducing in accordance with Article 7 of Delegated Regulation (EU) 2017/591.	'TRUE'—the position is risk reducing 'FALSE'—the position is not risk reducing	VARCHAR2	20	
Trading Member Code	Trading Member Code		ALPHANUM	4	
Position Holder Trading Code	Position Holder Trading Code		ALPHANUM	12	

NOTES:

1. Table 2 is submitted each time a new position account is created.
2. Trading members are required to have a unique position (clearing) account linked with a unique Trading code for each Trading Member.

We undertake to directly inform HEnEx in case of any change occurred in the information as declared herein.

SIGNED ON BEHALF OF THE REPORTING PARTICIPANT BY ITS LEGAL REPRESENTATIVE	
Name:	

Position:	
Date:	