

Client Handbook for LEI updates
applicable to EMIR and SFTR

Information for clients

| August 2025

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Calls may be recorded for monitoring and quality control purposes.		

DEFINITIONS

BIC	ISO 9362 Business Identifier Code
CCP	Central Counterparty
CLC (or COD)	Client Code
CID	Client identifier
Client	An entity with a contractual relationship with REGIS-TR for the purpose(s) of reporting under EMIR and/or SFTR. Note: also referred to as Member in this and other Governing Documents.
Corporate action / Corporate event	Merger, acquisition or other change of the legal structure of a corporation or institution.
EEA	European Economic Area
EMIR	European Market Infrastructure Regulation (EU) 648/2012
ESMA	European Securities and Markets Authority
GLEIF	Global Legal Entity Identifier Foundation
ID	Identifier
IEI	International Entity Identifier, also known as Interim Entity Identifier, a precursor to the LEI
LEI	ISO 17442 Legal Entity Identifier
LEI update	Update of the LEI of a counterparty in the Client's Registered Data records.
MED	Master Entity Data application
Member	An entity with a contractual relationship with REGIS-TR.
Old ID	Previous ID used by an entity. For EMIR, the type of the Old ID may be LEI, BIC, CLC or IEI. For SFTR, the Old ID is an LEI or CLC.
RM	Relationship Manager
RSO	Onboarding team
SFTR	Securities Financing Transactions Regulation (EU) 2015/2365

TR	Trade Repository
UTI	EMIR: Unique Trade Identifier SFTR: Unique Transaction Identifier
VAT	Value Added Tax

FOREWORD

The purpose of this Handbook is to set out the procedure that should be followed to request an entity's identifier update following a corporate restructuring event, and in case of update of a non-unique identifier to an LEI.

This Handbook has been prepared in accordance with:

- EMIR Article 80.5 which says that a trade repository shall allow the parties to a contract to access and correct the information on that contract in a timely manner;
- ESMA's Final Report Guidelines for reporting under EMIR 4.14 Procedure when a counterparty undergoes a corporate action;

Capitalised terms and expressions in this Client Handbook have the meaning attributed to those terms in the REGIS-TR Terms and Conditions ("GTCs"), unless otherwise defined in this Handbook. This Client Handbook is available from the [REGIS-TR website](#). Questions about this Client Handbook should be addressed to Client Services or your Relationship Manager.

Members' liability in respect of this Client Handbook

Clients are bound under law by the EMIR and/or SFTR regulations, guidance provided by ESMA and the Governing Documents, of which this Client Handbook is one.

REGIS-TR shall not be held responsible in the event that the Client fails to observe the procedures, guidance and other content set out in this Client Handbook. REGIS-TR will assume no responsibility nor obligation with respect to the accuracy and completeness of the information provided to it by the Members or other TRs, nor to its own reliance upon that information. Equally, where REGIS-TR transmits that information to any party, including the other Members, the other TRs and the regulators, REGIS-TR will not assume any liability with respect to the reliance placed by those parties upon that information.

Without prejudice to any other liability provision included in the Governing Documents, REGIS-TR shall not be held liable, without any right to set-off or counterclaim, for indemnifying, and shall be held harmless from and against any direct or indirect damages and all costs, claims, threats, suits, penalties, losses,

expenses, taxes and any direct or indirect liability (together with any VAT and interest thereon), personal or otherwise, arising from or by reason of the Member, another TR's or REGIS-TR's acts or omissions in connection with or pursuant to the procedure defined in the present Client Handbook, or in the event that the Member or another TR did not comply with that procedure or with the applicable legal, regulatory and administrative requirements.

INTRODUCTION

About this Handbook	<p>A company or institution with a new LEI must ensure that its active Registered Data are updated with the new LEI in the trade repository.</p> <p>The LEI update process depends on whether the change is required due to:</p> <ul style="list-style-type: none"> • a merger, acquisition or other corporate action, or • the update to an LEI from a non-unique Old ID. <p>This Handbook describes the LEI update procedure for Clients.</p>
Important: LEI reported incorrectly in Registered Data	<p>In this case, do not follow the LEI update procedure. Instead, you and/or your counterparty should:</p> <ol style="list-style-type: none"> 1. Cancel the misreported Registered Data with an Action type E/EROR (Error) message, and 2. Report the Registered Data again using the correct LEI and the UTI previously agreed.
LEI update due to corporate event	<p>In this case, it may be necessary to make changes to your REGIS-TR Accounts and Registered Data.</p> <p>Important: Fill in the LEI update request in MED at the latest 30 days in advance of a corporate event to ensure sufficient time to:</p> <ol style="list-style-type: none"> 1. Assess your Account requirements, and 2. Complete any necessary Account procedures.
Updates to non-unique IDs (BIC, CLC and IEI)	<p>There are non-unique IDs that may appear in the Registered Data as the ID of the Other counterparty (EMIR Registered Data from before 1 November 2017 may require replacement to LEIs in other fields too) and can be updated to LEIs.</p> <p>Note: If an Old ID to be updated is found to have been used in the reporting related to more than one Account, REGIS-TR will contact you to request a file of the UTIs to be updated.</p>
Partial corporate actions	<p>In the case of a split, partial merger or other partial corporate action, you may require LEI updates to only some of your active Registered Data. In this case, REGIS-TR will require a file of the UTIs to be updated.</p> <p>Note: a partial corporate action that requires an update of all of your active Registered Data is not a partial LEI update.</p>

Execution date EMIR	<p>REGIS-TR will aim to populate your records with the new LEI on the event date specified on the LEI update notification request. It may be possible to update the records during week-end:</p> <ol style="list-style-type: none"> 1. The number of records to be updated is too large, and 2. The update cannot be performed without blocking more than one Client Account.
Execution date SFTR	<p>REGIS-TR will aim to populate your records with the new LEI on or near the event date specified on the LEI update notification request. It may be possible to update the records during a REGIS-TR working day:</p> <ol style="list-style-type: none"> 1. The number of records to be updated is not too large, and 2. The update can be performed without blocking more than one Client Account.
If you request the update after implementing the LEI	<p>Follow the procedure for Requesting LEI updates described below. If the LEI update was not communicated in due time, the LEI update will be executed on a best effort basis 30 days after the complete request has been received and backdated to the Event Date that triggered your new LEI.</p>
Corporate actions: merger between counterparties of the records	<p>On the date of the merger, each Counterparty shall cancel any active Registered Data records between the merged parties. Reason: a Registered Data record is normally invalid if the counterparty is the same on both sides.</p> <p>The Registered Data records are cancelled with action type ETRM (termination/early termination) messages.</p>
LEI updates for counterparties without reporting obligation	<p>If your counterparty has no reporting obligation (e.g. is located outside of the EEA) and has adopted a new LEI:</p> <ol style="list-style-type: none"> 1. Tick the appropriate box in the MED LEI Update form (Reporting obligation No) 2. Follow the LEI update procedure to update your active Registered Data with that counterparty.

Client Handbook for LEI updates

This Handbook covers:

1. Requesting LEI updates
 - a. Introduction
 - b. Documentation
 - c. Complete the LEI update notification form
 - d. After submitting the LEI update notification form
 - e. Partial LEI updates
 - i. Create file of UTIs to be updated (R022.csv)
 - ii. Submit file of UTIs to be updated
 - iii. After submitting the UTIs file
2. Processing LEI updates
 - a. Notification of the planned LEI update to the market
 - b. Execution
 - c. Notification of the completed LEI update
 - d. LEI updates performed by another TR.

REQUESTING LEI UPDATES

Introduction

About this procedure	This procedure describes how to request an LEI update to your active Registered Data under EMIR and/or SFTR.
This procedure applies to	<ol style="list-style-type: none"> 1. The entity requiring the LEI update for itself or the other counterparty, and/or 2. The entity delegated to report on behalf of the entity requiring the LEI update.

Documentation

Contact REGIS-TR	<ol style="list-style-type: none"> 1. Fill in the LEI update request. Important: Do this as soon as the information is publicly available that an LEI update is required. 2. We will ask you to: <ol style="list-style-type: none"> a. Complete an LEI update notification request in MED under Service request\LEI update request, and b. Provide any file of UTIs to be updated and/or supplementary documentation, as relevant.
How to obtain an LEI update notification form	The form can be filled in directly in MED.
Supplementary documentation to be provided	<p>In case of a merger or acquisition, you should submit evidence or proof that the corporate action will or has taken place..</p> <p>To maintain your Client relationship with REGIS-TR, you need to upload replacements of the following documents if they are impacted by the LEI update in MED go to Section documentation, then Subsection Historical documentation:</p> <ul style="list-style-type: none"> • Articles of Association • Banking or Business License to operate under Luxembourg or other national law, dated within the last 6 months • Excerpt from company register including certificate of residency, dated within the last 6 months • Up to date official list of authorised signatures, plus specified authentication information • SEPA mandate for direct debit payments. <p>Note: If any of these documents is not available in English or Spanish, please supply:</p> <ul style="list-style-type: none"> • A copy of the document in the original language, and • A certified translation of the document into English.

LEI update notifications for multiple events	<p>Fill a separate LEI update notification request for each LEI update.</p> <p>Note: You have the option to replicate LEI updates already requested. Go to the LEI already requested, click on the actions button then replicate. Then change the information specific to the LEI update you are creating</p>
Price of the execution	<p>Each LEI update execution will have a fee which will be communicated to the requesting entity in advance to cover administrative steps and the technical execution. Please find further details in the SFTR/EMIR Fee Schedule available on REGIS-TR's website under Key documents > REGIS-TR S.A. > Fee schedules.</p> <p>LEI update executions received from other Trade Repository will not have any cost associated.</p>

Complete the LEI update notification form in MED

Type of notification	<p>The form will appear pre-filled with your entity's details. If the requestor is different from your entity it can be modified by selecting the 'The LEI is requested on behalf of another company' :</p>
Details of the REGIS-TR participant sending the form	<p>This is the entity making the request, which may or may not be the entity of the Old ID.</p> <p>The form will appear pre-filled with your entity's details. If the requestor different from your entity it can be modified by selecting the 'The LEI is requested on behalf of another company' tick box.</p>
Entity impacted by the LEI update	<p>This is the entity that has a new LEI that requires an update to the relevant Registered Data.</p> <p>Identification details:</p> <p>Details required:</p> <ol style="list-style-type: none"> Full registered company name (former company name) Old ID type (LEI or Non-LEI) Old ID Resulting registered company name Resulting ID type (LEI or Non-LEI) Resulting ID Event Date Event type Regulation Partial Update execution UTIs affected (if applicable) Shall contracts where old ID is not Counterparty 1, counterparty 2 or Entity Responsible for reporting be updated Other information

	<p>Event details:</p> <ul style="list-style-type: none"> n. Event Date date of the Corporate event , as of when REGIS-TR shall apply the new LEI to the Registered Data that was active on that date or has been reported as new since then. o. Type of event, e.g. acquisition, merger, spin-off, replacement of non-unique ID. p. Whether the LEI update is partial, see Update due to partial corporate action below. <p>Notes:</p> <ul style="list-style-type: none"> • If you require an Account closure after the LEI update has been executed, see Further actions – termination request below. • The Event date of the LEI update is usually the same date as when REGIS-TR executes the LEI update, see Execution date above except in certain cases where REGIS-TR will execute the LEI update on a weekend. This can be due to a high volume of data to be updated or if there are several LEI executions planned on the same date. In order to know how to report in the meantime, we kindly recommend contacting LEI Update Support.
Supporting documents and other information	<p>Please upload the following as and if relevant in MED:</p> <ul style="list-style-type: none"> a. A list of any document(s) you have provided in relation to your LEI update request, see Documentation. b. Other information that may be relevant to the LEI update request.
Signatures and return means	<p>When the LEI update form is complete, MED will generate the request as a document :</p> <ol style="list-style-type: none"> 1. The form must be signed by the authorised signatories either by electronic means (DocuSign) or wet ink. 2. Documents signed electronically or in wet ink can be submitted directly in MED.
Update due to partial corporate action	<p>If the type of event is a partial acquisition, partial merger, spin-off or similar, you will need to provide a list of the active Registered Data affected by the LEI change. See Partial LEI updates below.</p> <p>Note: a partial corporate action that requires an update of all of your active Registered Data is not a partial LEI update.</p>

Update of non-unique identifiers	If the Old ID is a non-unique identifier (BIC, CLC or IEI) and REGIS-TR finds that it has been used in relation to Registered Data for more than one Account, REGIS-TR will ask you to provide a list of UTIs to be updated. See Partial LEI updates below.
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Response to LEI update notification request	The status of your LEI update request will be updated in MED and will be visible to your system administrator
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After submitting the LEI update notification form

Modifications to LEI update notification request	Please contact REGIS-TR immediately when a previously registered LEI update needs to be amended.
Cancellation of a LEI update request	Please contact REGIS-TR immediately if the corporate action has been cancelled or the new LEI will not be implemented. A reversal may need to be executed if the LEI update has already been performed, see Reverse an LEI change or update below.
Modification or expiry of supplementary documents	If any supplementary document is amended or expires, please upload the updated documents as soon as possible in MED .
Reverse an LEI change or update	<ol style="list-style-type: none"> 1. Repeat the steps in Complete the LEI update notification form above. 2. In this case, enter the former LEI as the resulting LEI, and vice-versa. 3. If the reversal applies to only some of your Registered Data, follow the Partial LEI updates procedure, below.
Further actions – termination request	<p>An Account closure follows the usual process. This shall be requested via the MED application. Go to Accounts, then select the account you wish to close, go to 'Actions' and select 'Close account'</p> <p>Note: Accounts for EMIR cannot be closed if they contain active Registered Data.</p>

Partial LEI updates

Introduction	<ol style="list-style-type: none"> 1. Clients requesting a partial LEI update are required to provide a CSV file that identifies the Registered Data records to be updated. 2. This section describes how to create and submit this file.
This procedure applies to:	<ol style="list-style-type: none"> 1. Entities requesting LEI updates on only a part of their active Registered Data. 2. Entities that have been requested by REGIS-TR to provide a file of UTIs to be updated because they have requested an update of a non-unique Old ID that is used in more than one Account.

Timing	Submit the file as soon as possible. After REGIS-TR has verified and accepted your LEI update notification request and before the update is executed, REGIS-TR will request the CSV file.
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Create file of UTIs to be updated in EMIR

Introduction	The file should be structured as shown below.			
Filename EMIR	<p>The below filename should be applied: "oldId_eventDate.csv", being:</p> <ul style="list-style-type: none"> - oldId: old identifier - eventDate: event date when the corporate will take place/has taken place. <p>We will validate that the 'oldId' and 'eventDate' match with the information informed in the LEI Update request.</p>			
EMIR Format	CSV.			
File contents for EMIR				
	Header	Counterparty1	Counterparty2	UTI
	1	Field 1.4	Field 1.9	Field 2.1
UTI file example for EMIR	<p>Counterparty1, Counterparty2, UTI, (header)</p> <p>432100056789DCBAXXXX,AAAABBBBCCCCDDDDDEEEE,12345</p> <p>432100056789DCBAXXXX, BBBBCCCCDDDDDEEEFFFFF,57890</p>			
Note	For EMIR, the Counterparty 1, Counterparty 2 and UTI should be indicated and we will update the affected identifier of all the transactions which have the indicated UTI.			

Create file of UTIs to be updated in **SFTR** (R022.csv)

Introduction	The file should be structured as shown below.
Filename	No validation of the filename will be performed in the R022 submitted in SFTR.
Format	CSV, semicolon (;) separated plain text. Fields shall not be delimited by double quotes (") or other characters. Rows 1 to 3 have only a single field each. Note: the use of double quotes below is only to denote literal values.

File contents	Row no.	Description	Data format	Usage
	1	From	LEI	The LEI of the entity sending the file
	2	To	"RGTRRESMMXXX"	Always specify the BIC of REGIS-TR's branch
	3	Timestamp	YYYY-MM-DDThh:mm:ssZ	Date and time in UTC of the file generation Example: 2021-03-01T08:13:37Z
	4	Report type	"R022"	Always specify this report type
		Regulation	"SFTR"	The regulation that is relevant to the request
	5	Old ID Type	One of the following: "LEI" or "CLC".	Type of ID to be updated.
		Old ID	ID to be changed to the new ID	Full Old ID
	6	Column headings (used as file body delimiter)	"TRADE-ID"	Always specify this as the column headings of the list of records
			"RPTING-CPTY"	
			"OTHER-CPTY"	
	7..n	UTI	Up to 52 characters using A-Z, 0-9 and . : - _	Unique Trade Identifier
		Reporting counterparty ID	LEI	Use the Old ID if relevant
		Other counterparty ID	LEI or up to 50 alphanumeric characters	Use the Old ID if relevant
	8	Footer	n-1	n-1

R022 example	123400098765ABCDXXXX RGTTRESMMXXX 2021-01-15T08:13:37Z R022;SFTR LEI;432100056789DCBAXXXX TRADE-ID;RPTING-CPTY;OTHER-CPTY 123456-A;432100056789DCBAXXXX;AAAABBBBCCCCDDDEEEE 234567-B;PPPPQQQRRRRSSSSTTTT;432100056789DCBAXXXX 8
Note	All the legs (UTI+RC+OC) affected by the partial execution should be indicated in the R022. If only one leg is indicated, only one leg will be updated.

Submit file of UTIs to be updated

How to send the file	Upload the file containing the UTIs in MED.
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After submitting the UTI file

UTI file validation for SFTR	REGIS-TR validates each UTI in the file to ensure that: <ol style="list-style-type: none">1. The old identifier details match the information in the REGIS-TR database for the Reporting Participant, Other Counterparty, as applicable.2. Each UTI has been reported to REGIS-TR.
UTI validation for EMIR	REGIS-TR validates each UTI in the file to ensure that: <ol style="list-style-type: none">1. There are no duplicated UTIs in the file.2. The old identifier details match the information in the REGIS-TR database for the Reporting Participant, Other Counterparty and/or Report Submitting Entity, as applicable.3. Each UTI has been reported to REGIS-TR.
Validation results	If the file passes all the validations, it is saved in the REGIS-TR database and processed. If the file fails any of the validations, the process is stopped, and REGIS-TR will contact you.

PROCESSING LEI UPDATES

Notification of planned LEI updates

Notifications to other TRs	<p>REGIS-TR will inform the other TRs of the details of the planned LEI update. Note: This notification must be made as follows:</p> <p>EMIR; three weeks before the execution date to the Client's records.</p> <p>SFTR: two weeks before the date of the update to the Client's records.</p> <p>REGIS-TR will also inform the other TRs if the date of the execution is changed, or if the LEI update is cancelled.</p>
Notifications to other REGIS-TR Members	<p>The entity that has requested the LEI update consents that REGIS-TR will:</p> <ol style="list-style-type: none"> 1. inform its Clients in advance of the details of the planned LEI update, and 2. also inform its Clients if the LEI update could not be executed.
Notifications to the regulatory authorities	<ol style="list-style-type: none"> 1. REGIS-TR will communicate the details of the planned LEI update to the regulators authorised to access the affected Registered Data. 2. REGIS-TR will also inform those regulators if the LEI update could not be executed.
Communication with the Client's counterparties	<p>In some cases, multiple update requests are made for the same LEI by different participants.</p> <p>REGIS-TR will contact those participants to ensure that the details provided are consistent and the correct change is performed.</p>

Execution

Introduction	After validating the information and documentation provided by the Client, REGIS-TR will perform the LEI updates as below.																				
Updated fields	<div>Where applicable, the following fields will be updated in the Client’s active Registered Data.</div> <table><tr><th colspan="2">EMIR Fields</th><th colspan="2">SFTR Fields</th></tr><tr><td>1.2</td><td>Report submitting entity ID</td><td>1.2, 3.3, 4.3</td><td>Report submitting entity</td></tr><tr><td>1.3</td><td>Entity responsible for reporting</td><td>1.3, 3.4, 4.4</td><td>Reporting counterparty</td></tr><tr><td>1.4</td><td>Counterparty 1 (Reporting counterparty)</td><td>1.12</td><td>Country of the other Counterparty</td></tr><tr><td>1.8</td><td>Broker ID</td><td>1.10, 3.5, 4.5</td><td>Entity responsible for the report</td></tr></table>	EMIR Fields		SFTR Fields		1.2	Report submitting entity ID	1.2, 3.3, 4.3	Report submitting entity	1.3	Entity responsible for reporting	1.3, 3.4, 4.4	Reporting counterparty	1.4	Counterparty 1 (Reporting counterparty)	1.12	Country of the other Counterparty	1.8	Broker ID	1.10, 3.5, 4.5	Entity responsible for the report
EMIR Fields		SFTR Fields																			
1.2	Report submitting entity ID	1.2, 3.3, 4.3	Report submitting entity																		
1.3	Entity responsible for reporting	1.3, 3.4, 4.4	Reporting counterparty																		
1.4	Counterparty 1 (Reporting counterparty)	1.12	Country of the other Counterparty																		
1.8	Broker ID	1.10, 3.5, 4.5	Entity responsible for the report																		

1.9	Counterparty 2	1.11, 3.6	Other counterparty
1.10	Country of the counterparty 2	1.13	Beneficiary
1.15	Broker ID	1.14	Tri-party agent
1.16	Clearing member	1.15	Broker
2.5	PTRR ID	1.16	Clearing member
2.33	Central counterparty	1.17	Central Securities Depository ('CSD') participant or indirect participant
2.40	PTRR service provider	1.18	Agent lender
2.77	Other payment payer*	2.7	CCP
2.78	Other payment receiver*	2.54, 2.93	LEI of the issuer
1.12	Beneficiary ID		
2.37	CCP ID		
2.84	Reference Entity		
* Will only be updated if reported with LEI			

Notification of completed LEI updates

Notifications to EMIR Clients	Once the update is completed in the EMIR Registered Data, REGIS-TR provides the clients impacted by an LEI update with a report through the EMIR REFIT Portal.
Report contents	<p>Reporting Counterparty old ID,</p> <p>Other Counterparty old LEI</p> <p>UTI</p> <p>Reporting Counterparty new LEI</p> <p>Other Counterparty new LEI</p> <p>RESULT (executed or failed)</p> <p>ERROR_CODE (if applicable)</p> <p>ERROR_DESCRIPTION (if applicable)</p> <p>Updated_Fields</p> <p>Old_value (of the updated field)</p> <p>New_value (of the updated field)</p>
Report format	CSV
Report naming convention	<ol style="list-style-type: none"> 1. account = the account associated to the LEI of the Requester LEI 2. FBTRQ = file type feedback TRQ. 3. YYYYMMDD = date of the latest analysis 4. trq40id = the unique LEI update identifier 5. content type = contacts or margins 6. execution= fixed value to identify that the csv contains LEI update execution results 7. XXX a sequence number in case the file must be fragmented, starting at 001 (fragmentation will take place every 500.000 registers) 8. Version number = version of the csv starting at 1.
Examples	<p>eudbia0o8000_FBTRQ_20250110_EUDLEI000010-contracts-execution_001-1.csv</p> <p>eudbia0o8000_FBTRQ_20250110_EUDLEI000010-margins-execution_001-1.csv</p>

LEI updates performed by another TR

Introduction	<p>REGIS-TR Clients acknowledge and agree that in the event of an LEI update to be performed by another TR:</p> <ul style="list-style-type: none">• REGIS-TR has no obligation to verify the correctness, accuracy, and completeness of the information provided by that TR, and• REGIS-TR will fulfil the obligations listed below.
Update Registered Data in the REGIS-TR database	<p>On the date notified by the other TR, REGIS-TR will update the Registered Data affected in its own database. Note: this update will be performed whether or not REGIS-TR has received an update notification from its Client.</p>
Notification to REGIS-TR Clients	<p>REGIS-TR will inform its Clients of the details of the LEI update requested by the other TR.</p>
Notification to regulators	<p>REGIS-TR will notify the details of the LEI update to the regulators that have access to the Registered Data affected.</p>
Maintain records	<p>REGIS-TR will create and maintain records of the changes in its reporting log system.</p>
Validation	<p>REGIS-TR will validate Contractual Data reports received after the LEI update against the GLEIF reference data as required. Where the validation fails, those reports will be rejected.</p>