



European Securities and  
Markets Authority

# Consultation Paper

**Draft guidelines on the reporting to competent authorities under  
article 37 of the MMF Regulation**



## Responding to this paper

ESMA invites comments on all matters in this paper and in particular on the specific questions in Annex I. Comments are most helpful if they:

- respond to the question stated;
- indicate the specific question to which the comment relates;
- contain a clear rationale; and
- describe any alternatives ESMA should consider.

ESMA will consider all comments received by **14 February 2019**.

Responses to this consultation paper can be sent using the response form, via [the ESMA website](#), under the heading 'Your input/Consultations'.

### Publication of responses

All contributions received will be published following the close of the consultation, unless you request otherwise. Please clearly and prominently indicate in your submission any part you do not wish to be publically disclosed. A standard confidentiality statement in an email message will not be treated as a request for non-disclosure. A confidential response may be requested from us in accordance with ESMA's rules on access to documents. We may consult you if we receive such a request. Any decision we make not to disclose the response is reviewable by ESMA's Board of Appeal and the European Ombudsman.

### Data protection

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### Who should read this paper

This document will be of interest to (i) MMF managers and their trade associations, (ii) alternative investment funds and UCITS managers and their trade associations, as well as (iii) institutional and retail investors (and associations of such investors) investing in MMF.

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# 1 Executive Summary

## Reasons for publication

Article 37 of the MMF Regulation (see Annex II to this paper for the full text of the relevant Article) provides that ESMA shall develop draft implementing technical standards to establish a reporting template containing all the information managers of MMFs are required to send to the competent authority of the MMF.

The draft ITS were finalized by ESMA in November 2017<sup>1</sup> and endorsed and published by the Commission in April 2018<sup>2</sup>.

With respect to these ITS on the establishment of a reporting template and the timing of implementation of the corresponding database, ESMA confirms that managers would need to send their first quarterly reports mentioned in Article 37 to NCAs in Q1 2020 (and not in July 2018). In addition, there will be no requirement to retroactively provide historical data for any period prior to this starting date of the reporting.

Following the publication of these ITS, ESMA worked on the Guidelines and IT guidance that will complement the information included in the ITS so that managers of MMFs have all the necessary information to fill in the reporting template they will send to the competent authority of their MMF, as specified in article 37 of the MMF Regulation.

This consultation paper (CP) represents the first step in the development of such specifications of the guidelines described above and sets out proposals on which ESMA is seeking the views of external stakeholders.

## Contents

Section 2 explains the background to our proposals. Sections 3 and 4 give detailed explanations on the content of the proposals and seek stakeholders' input through specific questions.

Annex I sets out the list of questions contained in this paper.

Annex II contains the legislative reference in the MMF Regulation in relation to the abovementioned reporting template.

Annex III sets out the cost-benefit analysis related to the draft updated guidelines.

Annex IV contains the full text of the draft updated guidelines.

## Next Steps

Responses to this consultation will help ESMA in finalising the draft guidelines (for publication).

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<sup>1</sup> [https://www.esma.europa.eu/sites/default/files/library/esma34-49-103\\_final\\_report\\_on\\_mmf\\_cp.pdf](https://www.esma.europa.eu/sites/default/files/library/esma34-49-103_final_report_on_mmf_cp.pdf)

<sup>2</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018R0708&from=EN>



## 2 Background

### 2.1 Level 1 and 2 provisions and existing legal framework

1. The MMF Regulation (Article 37) obliges the manager of the MMF, for each MMF managed, to report information to the competent authority of the MMF, at least on a quarterly basis. The frequency of reporting is annual in the case of a MMF whose assets under management in total do not exceed EUR 100 million.
2. These reports need to include a number of elements listed in the Regulation, and ESMA was required to develop draft implementing technical standards (ITS) to establish a reporting template that contains the relevant information. ESMA had to submit those draft ITS to the Commission by 6 months after the entry into force of the Regulation. It is to be noted that article 37(2) of the MMF Regulation also specifies that in addition to this list of information “*If necessary and duly justified, competent authorities may solicit additional information*”.
3. It is to be noted that these ITS relate only to the contents (expressed in Word format) of the information that would be included in the reporting template that would be used by managers of MMFs. The corresponding technical format of that reporting template will be specified later.
4. These ITS have been finalized by ESMA in its final report on MMF (Technical advice, draft implementing technical standards and guidelines under the MMF Regulation)<sup>3</sup> dated November 2017, and then adopted by the Commission<sup>4</sup>.

#### Background

5. Under the requirements of Article 37(4) of the MMF Regulation, ESMA was required to develop draft ITS to establish a reporting template that contains for each MMF the following information:
  - (a) the type and characteristics of the MMF;
  - (b) portfolio indicators such as the total value of assets, NAV, WAM, WAL, maturity breakdown, liquidity and yield;
  - (c) the results of stress tests and where applicable the proposed action plan;
  - (d) information on the assets held in the portfolio of the MMF:

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<sup>3</sup> [https://www.esma.europa.eu/sites/default/files/library/esma34-49-103\\_final\\_report\\_on\\_mmf\\_cp.pdf](https://www.esma.europa.eu/sites/default/files/library/esma34-49-103_final_report_on_mmf_cp.pdf)

<sup>4</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018R0708&from=EN>

- (i) the characteristics of each asset, such as name, country, issuer category, risk or maturity, and the outcome of the internal credit assessment procedure;
  - (ii) the type of asset, including details of the counterparty in the case of derivatives, repurchase agreements or reverse repurchase agreements;
- (e) information on the liabilities of the MMF that includes the following points:
- (i) the country where the investor is established;
  - (ii) the investor category;
  - (iii) subscription and redemption activity.
6. ESMA was also required to develop draft ITS to establish a reporting template that contains for each LVNAV MMF (in addition to the information mentioned in the previous paragraph) the following information:
- (a) every event in which the price of an asset valued by using the amortised cost method in accordance with the first subparagraph of Article 29(7) deviates from the price of that asset calculated in accordance with Article 29(2), (3) and (4) by more than 10 basis points;
  - (b) every event in which the constant NAV per unit or share calculated in accordance with Article 32(1) and (2) deviates from the NAV per unit or share calculated in accordance with Article 30 by more than 20 basis points;
  - (c) every event in which a situation mentioned in Article 34(3) occurs and the measures taken by the board in accordance with points (a) and (b) of Article 34(1).
7. ESMA included these different items in the reporting template submitted to the Commission, and then published. Following the publication of the ITS, ESMA worked on the Guidelines and IT guidance that will complement the information included in the ITS so that managers of MMFs have all the necessary information to fill in the reporting template they will send to the competent authority of their MMF, as specified in Article 37 of the MMF Regulation. This consultation paper (CP) represents the first step in the development of such specifications of the guidelines described above and sets out proposals on which ESMA is seeking the views of external stakeholders.

### **Existing EU requirements in the asset management sector on reporting templates (AIFMD)**

8. While there is currently no reporting template in the UCITS framework similar to the one envisaged in the MMF Regulation, the AIFMD framework can be a good source of inspiration since: i) as in the case of the MMF Regulation, the Commission and ESMA first had to establish a reporting template<sup>5</sup> ii) the functioning of the AIFMD database is the same

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<sup>5</sup> Annex IV of the Delegated Regulation 231/2013 and ESMA's guidelines on reporting obligations 2013/1339

as that envisaged in the MMF Regulation (managers send reports to NCAs, who then pass the information to ESMA for inclusion in a central database).

#### Interaction with the AIFMD database and reporting requirements

9. Having regard to the abovementioned similarities between the AIFMD database and the envisaged MMF one, one of the first key principles underlying the establishment of the required reporting template would ideally be to rely as much as possible on the work already done on the establishment of a reporting template in the case of the AIFMD database.
10. This means, in particular, that:
  - i) to the extent that this is possible from a legal standpoint, the same type of information should not be requested and expressed in two different ways in the two contexts of the AIFMD and MMF reporting requirements (e.g. the same types of indicators should be defined the same way); and
  - ii) a situation when the same manager would have to provide the same information both in the AIFMD and in the MMF database should be avoided, to the extent that this is possible from a purely IT/technical point of view.
11. However, there are a number of limitations to this exercise. First, the list of information to be provided by managers explicitly mentioned in the MMF Regulation differs to a large extent from the one included in the AIFMD database. Secondly, in some instances (e.g. the typology of assets) the typology of information (i.e. the way the information has to be categorized), also differs as compared to the one included in the AIFMD database. Thirdly, the competent authority that will receive the reports under the MMF framework is the competent authority of the MMF (Article 37(1)) while for the same MMF (when this is an AIF) the competent authority that will receive the reports under the AIFMD framework is the competent authority of the AIFM (the manager of the MMF). In some cases these will not be the same NCA. In addition, the Legal Entity Identifier (LEI), which could allow ESMA to identify the MMF (AIF) in such a situation, is not a mandatory requirement under the AIFMD reporting framework. Finally, the frequency of reporting may differ for a given MMF between the AIFMD and the MMF reporting requirements.
12. From an IT standpoint, it is also worth mentioning that the format of the MMF reports will use the ISO 20022 Standard currently used in the context of the MiFIR and EMIR reporting requirements, and which will therefore differ from the AIFMD one. In order to establish a homogeneous reporting, this technical format will define in particular the format of each element, the order in which these elements should appear, and which of these elements are mandatory or optional. It would also ensure that the reported data are compliant with the defined syntax rules. The Guidelines will be supplemented by related technical documents on reporting instructions. In particular, these technical documents will include: (i) the reporting validation rules specifying the criteria of acceptance of MMF reports

by the NCAs and conditions under which fields are not applicable and should not be populated and (ii) the XML schemas of the candidate ISO 20022 messages. These documents are referred to in the Guidelines and are expected to be published by the end of 2019.

13. On the one hand, it is therefore suggested to apply as strictly as possible the principle expressed above (the same type of information should not be requested and expressed in two different ways in the AIFMD and MMF reporting requirements), even though it might be in some cases necessary to depart from this principle because of the different nature of the AIFMD and MMF databases. On the other hand, from a technical point of view, given the limitations described above, it is suggested to depart from the principle included in paragraph 10, so that the two AIFMD and MMF databases would be dealt with separately (which means that AIF MMFs will have to report separately under the AIFMD and the MMF Regulation).

#### ITS and guidelines

14. As mentioned above, in the context of the AIFMD database, while the reporting template itself was included in Annex IV of the Delegated Regulation 231/2013, there was a need to supplement this information with ESMA guidelines on the reporting obligations (2014/869)<sup>6</sup>. These guidelines included in particular IT-related specifications on the contents of the reporting template in order to facilitate the standardisation of the exchange of information.
15. In the context of the MMF Regulation, the ITS will effectively be the equivalent of Annex IV of the Delegated Regulation 231/2013 in the AIFMD context.
16. In that case, there is a need to supplement these ITS with guidelines and IT guidance, as in the case of the AIFMD database. These suggested Guidelines are presented in the next section of this consultation paper.

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<sup>6</sup> <https://www.esma.europa.eu/sites/default/files/library/2015/11/2014-869.pdf>

## 3 Guidelines on reporting to competent authorities

### 3.1 General principles

17. This section includes general principles that apply to the entire MMF reporting. It provides high level approaches to reporting and further guidance on the reporting periods to be applied as well as the procedure for first reporting.

#### I. Reporting and submission periods

18. With respect to reporting periods, a number of elements could be specified, in order to complement the requirements included in the ITS and the article 37 of the MMF Regulation.

19. As in the AIFMD Guidelines (paragraph 8 – adapted below in the context of MMFs), ESMA is of the view that the following specifications could be appropriate:

*“The reporting periods are aligned with the Trans-European Automated Real-time gross settlement*

*Express Transfer (TARGET) calendar and reporting periods end on the last day of March, June, September and December of each year. This means that MMFs subject to yearly reporting obligations will report once a year as of the last day of December. MMFs subject to quarterly reporting obligations will report on a quarterly basis as of the last day of March, June, September and December.*

*If the last day of a reporting period in a jurisdiction of a reporting MMF is a bank holiday and no data is available for that date, the MMF should use information from the immediately last previous day when the information is available, but the reporting date should remain the last day of the reporting period according to the TARGET calendar.*

*In all these cases, managers of MMF could send the report to the competent authority of the MMF until 30 days after the end of the corresponding quarter (year).”*

#### II. Procedure for first reporting

20. With respect to first reporting, a number of elements could be specified, in order to complement the requirements included in the ITS and the article 37 of the MMF Regulation.

21. As in the AIFMD Guidelines (paragraph 11 – adapted below in the context of MMFs), ESMA is of the view that the following specifications could be appropriate:

*“There may be cases in which managers of MMFs do not have any information to report on MMFs. In such a scenario, managers of MMFs should still provide a report to their NCAs by indicating that no information is available by using a specific field”.*

22. Given the experience of NCAs on that specific topic in the context of the AIFMD database, ESMA is of the view that the potential situations in which managers of MMFs do not have any information to report on MMFs should be listed exhaustively. There would be a drop down menu allowing choosing among the following cases:

- the MMF has not been launched yet;
- Quarterly reporting MMFs passing below the threshold of 100 million EUR (as referred to in article 37(1) of the MMFR) during the year and therefore ceasing to report quarterly during the course of the year;
- the MMF is a “dormant fund” (temporary closed).

23. The last item of that list would be “other” allowing for free text. In addition to the no reporting flag ESMA would also add a “Last reporting flag”, as in the case of the AIFMD reporting.

24. In relation to the date when the managers of MMFs should start reporting, ESMA is of the view that this should be the first authorization date. This approach would indeed ensure alignment with the AIFM reporting approach. It would also ensure consistence with the central public register under Article 4 of the MMFR. This approach allows to capture under the reporting all funds that have been authorised under the MMFR by a NCA, and allows cross-checks with Article 4 register. This approach would disincentive managers to create MMFs without clear or fast intention to launch them. Reporting duties are an incentive to promote timely launch after authorisation. For authorised funds that would not be launched yet, the reporting duty will be limited to a “no flag” reporting only that was specifically created for this purpose. Such a “no flag” reporting is easy and not costly to implement:

*“The date when the managers of MMFs should start reporting should be the first authorization date (exact date)”*

25. Furthermore, it could also be considered whether the first reporting should occur 1) at the exact abovementioned date or start 2) the first quarter or 3) the first month after that date. Reporting starting from the exact date ensure no information is missed whereas reporting from the first month or quarter might provide managers more flexibility. ESMA’s preference is for option 1). As in the context of the AIFMD reporting, a corresponding MMF no reporting flag would be included:

- true for empty file (no information to report for the reporting period)
- false otherwise.

26. ESMA is however of the view that in order to reduce the costs of compliance, managers of MMFs subject to yearly reporting in accordance with article 37(1) of the MMF Regulation are allowed to report on a quarterly basis. ESMA is of the view that managers of MMFs should favour this option if they are of the view that this would be more simple for them, given they manage at the same time other MMFs subject to quarterly reporting.

**Questions to stakeholders:**

**Q1: Are you of the view that there could be merits for managers of MMFs subject to yearly reporting in accordance with article 37(1) of the MMF Regulation to report on a quarterly basis so that their corresponding operational process is less burdensome?<sup>7</sup>**

**Q2: Do you identify potential situations in which managers of MMFs do not have any information to report on MMFs other than those listed above (e.g. certain types of situations of liquidation of the MMF)?**

27. Without prejudice to the above, ESMA is of the view that the additional specification taken from the AIFMD guidelines (paragraph 13) could also be appropriate:

*“Managers of MMFs should report information to their national competent authorities only once per reporting period covering all the reporting period. For example, managers of MMFs subject to yearly reporting obligations should only provide one report to their NCAs for each year period (yearly period that always end on 31 December of that specific year). Managers of MMFs subject to quarterly reporting obligations should only provide one report to their NCAs for each quarterly period.”*

28. In any case, in addition, as in the context of the AIFMD database, there would be a technical field on reporting frequency to indicate whether the reporting of the manager for a specific MMF is quarterly or yearly.

29. There would also be a technical field on MMF Reporting Change Frequency Code so that the manager of a specific MMF could report a change in the reporting frequency (from quarterly to yearly or from yearly to quarterly) (please also see next section).

**III. Procedure when managers of MMFs are subject to new reporting frequency or changes to their reporting frequency**

30. With respect to the procedures when managers of MMFs are subject to new reporting obligations, a number of elements could be specified, in order to complement the requirements included in the ITS and the article 37 of the MMF Regulation.

31. First, with respect to the thresholds referred to in Article 37(1), ESMA is of the view that it should be clarified how and when to measure it. In that respect, ESMA is of the view that the calculation of the thresholds should be made when the corresponding data (on NAV) is made available on a quarterly basis:

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<sup>7</sup> This option has legal support on the second subparagraph of Article 37 (1) where it is established that for an MMF whose assets under management in total do not exceed EUR 100 000 000, the manager of the MMF shall report to the competent authority of the MMF **on at least** an annual basis.

*“With respect to the thresholds referred to in Article 37(1) of the MMF Regulation, it is recalled that assets under management are considered for the purpose of the reporting template under the MMF Regulation to equal the NAV, as per row 4 a) and field A.4.1 of the Implementing Regulation 2018/708. Furthermore,<sup>8</sup> ESMA is of the view that the NAV should be measured when the corresponding data is made available on a quarterly basis (last day of the quarter).”*

32. As in the AIFMD Guidelines (paragraph 17 – adapted below in the context of MMFs), ESMA is of the view that the following specifications could be appropriate. The AIFMD guidelines (paragraph 17) specify all possible changes in reporting frequency and provide clarification on the scope of the information to be provided. These procedures are based on the assumption that when an AIFM is granted its authorisation under the AIFMD, all the procedures necessary to comply with the new reporting obligations are in place. When AIFMs report for the first time after a shift in a reporting frequency, they should indicate the change to their NCAs by using a specific field.

33. In the context of the MMF Regulation, such changes are possible for:

*Case 1 - From MMF with yearly reporting obligation to MMF with quarterly reporting obligations*

*Case 2 - From MMF with quarterly reporting obligation to MMF with yearly reporting obligations*

34. The following corresponding specifications could be included in the Guidelines:

*“Case 1 - From MMF with yearly reporting obligation to MMF with quarterly reporting obligations*

- 1) > 100 mio € during Q1: the following reports have to be submitted to the competent Authority: Q1, Q2, Q3, Q4*
  - 2) > 100 mio € during Q2: the following reports have to be submitted to the competent Authority: H1 (covering the first 6 months of the year), Q3, Q4*
  - 3) > 100 mio € during Q3: the following reports have to be submitted to the competent Authority: X1 (covering the first 9 months of the year), Q4*
  - 4) > 100 mio € during Q4: the following reports have to be submitted to the competent Authority: Y1 (covering the first 12 months of the year), then quarterly reporting during the next year*
- The merits of this process of submission of reports in this case 1 are the following ones: It is to some extent aligned with the corresponding requirements of the AIFMD reporting

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<sup>8</sup> Please note that the article 37 of the MMF Regulation includes the terms “asset under management”. However, the Implementing Regulation 2018/708 specified that for the purpose of the reporting template (that is, the requirements of the article 37), the total value of assets equal the NAV, and ESMA’s interpretation is that this statement should therefore be used for the purpose of the present Guidelines.



- Only one single report is to be provided at the end of the quarter during which the threshold of 100 Mio was breached.
- There is no need to recollect old portfolio data of previous quarters (which are not strictly required by level 1 since the fund would be under 100 mio at that time).

*In addition, it is considered that the break of a threshold at the end of a quarter should trigger the submission of the reporting on the quarter itself and not stating from the next quarter*

*Case 2 - From MMF with quarterly reporting obligation to MMF with yearly reporting obligations*

*In this case, the following process is suggested::*

*Below threshold (< 100 mio €) at the last business day of a quarter the AuM:*

*If Q1 => the following reports have to be submitted to the competent Authority: only Y*

*If Q2 => the following reports have to be submitted to the competent Authority: Q1, X2 (covering the last 9 months of the year)*

*If Q3 => the following reports have to be submitted to the competent Authority: Q1, Q2, H2 (covering the 6 months of the second half of the year)*

*If Q4 => the following reports have to be submitted to the competent Authority: Q1, Q2, Q3, Q4 (no change until YYYY+1)"*

**IV. ECB exchange rate (referred to in fields A.4.1, A.6.12, A.6.16, A.6.30, A.6.34, A.6.52, A.6.54, A.6.56, A.6.67, A.6.70, A.6.80, A.6.91, A.6.93, A.6.97, B.1.11, B.1.13)**

35. Fields A.4.1, A.6.12, A.6.16, A.6.30, A.6.34, A.6.52, A.6.54, A.6.56, A.6.67, A.6.70, A.6.80, A.6.91, A.6.93, A.6.97, B.1.11, and B.1.13 of the ITS specify that if the base currency is not EUR the exchange ratio used shall be the ECB one.

36. In addition, it is suggested to add the following specification, inspired by the AIFMD Q&A 65:

*"Euro foreign exchange reference rates are quoted by ECB as base currency against euro (e.g. expressed as 1 EUR = 129.04 JPY as of 29<sup>th</sup> June 2018). Thus, value presented in the fields in base currency should be divided by this rate. For example, if, as of end of Q2 2018 (last business day 29<sup>th</sup> June 2018), the NAV of the fund is expressed in JPY and worth 150 billion of Japanese yen (value reported in field A.4.2), value to report in the (A.4.1) field will be 150 billion / 129.04 = 1.162 billion of EUR (rounded here at 10<sup>-3</sup>)"*

37. ESMA is of the view that the MMF Guidelines could specify which sources should be used by managers of MMFs if the base currency is not included in the list of currencies for which the ECB provides an exchange rate.

**Question to stakeholders:**

**Q3: Do you agree that the MMF Guidelines could specify which sources should be used by managers of MMFs if the base currency is not included in the list of currencies for which the ECB provides an exchange rate? If yes, which sources should be used in your view?**

**V. Optional vs mandatory fields**

38. Based in particular on the experience of the AIFMD database, ESMA is of the view that it should be specified what “optional fields” (as opposed to the fields which are mandatory – please see below the proposed definition of “optional” in the MMF context, “*Information marked as mandatory should be reported by all managers of MMFs. Information marked as optional should be reported by the manager of the MMF except if this regulatory information does not apply to this specific MMF at this specific point of time*”) mean, so that managers of MMFs avoid mistakes when filling in reports.

39. In the context of the AIFMD database, Q&A 21 specifies that:

*“Information marked as mandatory should be reported by all AIFMs. Information marked as optional has to be reported if the AIFM has information to report. For example, question 10 of the reporting template (change in AIF reporting obligation frequency code) is marked as optional. This means that AIFMs should report this information if the reporting code has changed compared to the previous reporting. Information marked as conditional is linked to other information (flags) in the reporting template. If those flags are answered with “Yes”, the corresponding conditional information has to be reported. However, if those flags are answered with “No”, the corresponding conditional information should not be reported. For example, if the question 41 (master feeder flag) is answered with “Yes”, AIFMs should indicate in field 42 the name of the master AIFs”*

40. ESMA is of the view that a similar definition should be specified in the context of the MMF database:

*“Information marked as mandatory should be reported by all managers of MMFs. Information marked as optional should be reported by the manager of the MMF except if this regulatory information does not apply to this specific MMF at this specific point of time. Information marked as conditional is linked to other information (flags) in the reporting template. If those flags are answered with “Yes”, the corresponding conditional information has to be reported. However, if those flags are answered with “No”, the corresponding conditional information should not be reported.”*

**VI. Allowing the manager of an MMF to provide comment on a reported element**

41. In the context of the AIFMD database, a question Number & Assumption description allowed the submitting entity to provide any useful comment on any reported element (AIFMD Q&A).
42. In the context of the MMF database, it is considered appropriate to define a drop down list of the fields for which the manager of the MMF is allowed to provide any useful comment.

**VII. Meaning of the format “%” (fields A.4.5, A.4.6, A.4.7, A.4.8, A.4.9, A.4.10, A.7.1, A.7.2, A.7.3, A.7.4, A.7.7), and use of the figure “0” in filling the reporting template**

43. Within the MMF reporting template, there are various fields in which the figure to be reported should be expressed as a % (fields A.4.5, A.4.6, A.4.7, A.4.8, A.4.9, A.4.10, A.7.1, A.7.2, A.7.3, A.7.4, A.7.7). ESMA is of the view that it should be specified how to exactly phrase this % in the MMF reports. In that context, ESMA is of the view that the same rule that applies in the case of the AIFMD reporting template (as specified in ESMA Q&As) should apply and that there should be no tolerance that the sum of the reported percentages (where relevant) should equal 100%, as in the case of the AIFMD guidelines on reporting. In addition ESMA is of the view that it should be clarified that when a manager of a MMF uses the figure “0” to fill in one of the fields of the reporting template, this can only mean the value of the figure (0) and nothing else (such as “non-submission”, “not relevant”, or “does not apply” or “no information is available”):

*“With respect to the different fields (fields A.4.7, A.7.2, A.7.3, A.7.4) where percentages need to be reported that sum up to 100%, managers should be aware that there will be no tolerance if the sum of the reported percentages (where relevant) does not strictly equal 100%, which means that if the sum of the reported percentages (where relevant) does not equal 100%, the report would be rejected. In addition percentages should be reported as numbers between 0 and 100. For example 53% should be reported as 53 (and not 0.53). This is also true for field A.4.7 which does not include the term “%” in the column “reported data” of the ITS.*

*In addition, when a manager of a MMF uses the figure “0” to fill in one of the fields of the MMF reporting template, this can only mean the value of the figure (0) and nothing else (such as “non-submission”, “not relevant”, or “does not apply” or “no information is available”).”*

**Question to stakeholders:**

**Q4: Do you identify any other issue that would need to be specified in relation to the above section on “general principles” of the reporting template?**

## 3.2 Blocks (collection of fields)

44. This section includes specifications in relation to each block of fields of the reporting template and addresses the relevant fields in relation to a particular topic, with accompanying guidance of how to populate these. The blocks are structured to be independent of each other.

### Block 1 – MMF characteristics

#### VIII. Identification (field A.1.2)

45. With respect to identification, a number of elements could be specified, in order to complement the requirements included in the ITS and the article 37 of the MMF Regulation.

46. As in the AIFMD Guidelines (paragraph 38 – adapted below in the context of MMFs), ESMA is of the view that the following specifications could be appropriate:

*“If the national code of the MMF as referred to in field A.1.2 of the ITS changes, managers of MMFs should always (for the first reporting following the change of the national code and any subsequent reporting) indicate the former national code together with the current national code”*

#### IX. Member State where the MMF is authorized (field A.1.9) and Member States where the MMF is marketed (field A.1.10)

47. With respect to the Member State where the MMF is authorized and the Member States where the MMF is marketed, a number of elements could be specified, in order to complement the requirements included in the ITS and the article 37 of the MMF Regulation

48. First, it is to be noticed that field A.1.9 relates to a singular form (“Member State”) whereas field A.1.10 relates to a plural form (“Member States”). The singular form reflects the case of an EU MMF but not the case of non-EU MMF for which the same MMF may have several competent authorities (see for example the case of a non-EU AIF MMF marketed in the EU without a passport in several Member States<sup>9</sup>, cf. article 2 (17) (c) (i) of the MMF Regulation). ESMA is of the view that it may be useful to clarify that the Member State to be reported in that case under field A.1.9 is the Member State of the Competent Authority to which the report is submitted.

49. ESMA is of the view that the following specifications could therefore be appropriate:

50. *“With respect to the Member State where the MMF is authorized (field. A.1.9), in the specific case of a non-EU MMF for which there could be several such competent authorities, all these several Member States should be reported under field A.1.9. It is to be*

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<sup>9</sup> under the requirements of article 42 of the AIFMD in particular

*noted that the same information on a specific MMF reported to different National competent authorities should be the same.” Furthermore, in the case of non-EU MMF, given the definition of competent authority in article 2(17) of the MMF Regulation, it is to be noticed that field A.1.10 is to be filled only in the cases where the non-EU MMF is marketed in the union.*

#### **X. Inception date (field A.1.11)**

51. In the context of the AIFMD database, the inception date is specified as follows in Q&A 12:

*“If an AIF is subject to pre-authorization, the inception date should be the date of authorisation. If an AIF is established without pre-authorization by the competent authority, the inception date should be the date when the AIF was established. Finally, if the AIF is subject to registration obligation at national level with its competent authority after the date of establishment, the inception date should be the date when the AIF was constituted”*

52. In the context of the MMF database, given in particular the specific nature of investments of MMFs, ESMA is of the view that, as opposed to the abovementioned solution adopted in the context of the AIFMD data base, the inception date could be defined as the date when the first NAV of the MMF is calculated (according to article 30(3) of the MMF Regulation, the NAV of an MMF shall be calculated at least on a daily basis):

*“The inception date of an MMF as referred to in field A.1.11 of the ITS is the date when the first NAV of the MMF is calculated. If the MMF was a pre-existing fund which has been granted the MMF Authorisation under the MMF Regulation, this inception date should be the date when the first NAV of this fund as a MMF (under the MMF Regulation) is calculated.”*

#### **XI. Base currency of the MMF (field A.1.12)**

53. With respect to the base currency of the MMF (field A.1.12), a number of elements could be specified, in order to complement the requirements included in the ITS and the article 37 of the MMF Regulation.

54. First, ESMA is of the view that it should be specified that the base currency of the MMF reported in field A.1.12 should be the same as indicated in the prospectus of the MMF:

*“With respect to the base currency of the MMF (field A.1.12), the base currency of the MMF reported in field A.1.12 should be the same as indicated in the prospectus of the MMF. If an MMF is composed of different share classes that differ in relation to their base currency the base currency that should be included in field A.1.12 is the base currency as specified in the reference accounting documents of the MMF.”*

**Question to stakeholders:**

**Q5: Do you agree that if an MMF is composed of different share classes that differ in relation to their base currency the base currency that should be included in field A.1.12 should be the base currency as specified in the accounting documents of the MMF or are you of the view that in that case the base currency of the largest share class should be included in field A.1.12? Would you see merit in aligning the inception date mentioned above in section X with the first reporting date, as defined in section II?**

55. One specific issue raised in the context of the AIFMD reporting (but also other regulatory reports) is related to some specific currency codes. For example, one issue relates to the CNH currency code (Chinese currency). It is therefore deemed relevant to add the following specification in the MMF Guidelines:

*“With respect to the base currency of the MMF (field A.1.12), for the particular case of currencies with several codes (e.g. onshore/offshore currencies such as Chinese renminbi with CNY/CNH), it should be noted that the instruments are to be reported with a single currency code (onshore one, here CNY - codes in the official ISO list) and to be converted into EUR at the applicable rate (e.g. instruments denominated in CNH to be reported with the CNY currency code and converted into EUR at the applicable EUR/CNY rate).”*

56. If the base currency of the MMF is Euro, ESMA is of the view that the fields A.4.2, A.6.13, A.6.15, A.6.17, A.6.31, A.6.33, A.6.35, A.6.53, A.6.55, A.6.57, A.6.68, A.6.71, A.6.81, A.6.92, A.6.94, A.6.98, B.1.12, and B.1.14 should not be filled in:

*“If the base currency of the MMF is Euro, the fields A.4.2, A.6.13, A.6.15, A.6.17, A.6.31, A.6.33, A.6.35, A.6.53, A.6.55, A.6.57, A.6.68, A.6.71, A.6.81, A.6.92, A.6.94, A.6.98, B.1.12, and B.1.14 should not be filled in.”*

## **XII. Feeder MMFs for MMF marketed solely through employee savings scheme (fields A.3.1 to A.3.4)**

57. With respect to Feeder MMFs for MMF marketed solely through employee savings scheme, a number of elements could be specified, in order to complement the requirements included in the ITS and the article 37 of the MMF Regulation.

58. As in the AIFMD Guidelines (paragraph 33 – adapted below in the context of MMFs), ESMA is of the view that the following specifications could be appropriate.

*“Managers of MMF should treat feeder MMFs of the same master fund individually. They should not aggregate all the information on feeder MMFs of the same master(s) in a single report. Managers of MMFs should not aggregate master-feeder structures in a single report (i.e. one report gathering all the information on feeder MMFs and their master MMF(s)).”*

*When reporting information on feeder MMFs, Managers of MMFs should identify the master MMF in which each feeder invests but should not look through the master MMF(s) to its(their) holdings. If applicable, Managers of MMFs should also report detailed information on*

*investments that are made at feeder MMF level, such as investments in financial derivative instruments.”*

59. In addition, in relation to field A.3.1 - If the MMF complies with the requirements of Article 16(5) of the MMF Regulation, indicate whether the MMF is a master or a feeder fund [Select one] – ESMA is of the view that a NONE value should be added when the fund is not a feeder or a master. This will be added in the reporting template managers of MMF will have to fill in.

### **XIII. Share classes (fields A.3.5 to A.3.7)**

60. With respect to share classes, a number of elements could be specified, in order to complement the requirements included in the ITS and the article 37 of the MMF Regulation.

61. With respect to MMF with different share classes denominated in different currencies (field A.3.7), ESMA is of the view that it should be specified that under this field, the manager should report all different currencies of the different share classes, indicating which currency is related to which share class:

*“With respect to MMF with different share classes denominated in different currencies (field A.3.7), the manager of the MMF should report all different currencies of the different share classes, indicating which currency is related to which share class.”*

62. In addition, given the interaction with field A.7.5 that refers to the “largest share or unit class”, ESMA is of the view that managers of MMF should identify which share or unit class of the MMF is the largest within the list mentioned under field A.3.6:

*“With respect to the ISIN of the different share classes (field A.3.6), given the interaction with field A.7.5, managers of MMF should identify which share or unit class of the MMF is the largest within the list mentioned under field A.3.6”*

### **XIV. Merge of an MMF (field A.3.8)**

63. With respect to the merge of an MMF (field A.3.8), a number of elements could be specified, in order to complement the requirements included in the ITS and the article 37 of the MMF Regulation.

64. As in the AIFMD Guidelines (paragraph 15 – adapted below in the context of MMFs), ESMA is of the view that the following specifications could be appropriate (please note that the last report is a full report with additional information such as the last reporting flag):

- “Merged MMF

*Managers of MMFs should provide the last report of the MMF to their NCA not later than 30 days after the end of the quarter in which the MMF has been merged.”*

## **XV. Liquidation of an MMF (field A.3.9)**

65. With respect to liquidation of an MMF, a number of elements could be specified, in order to complement the requirements included in the ITS and the article 37 of the MMF Regulation.

66. As in the AIFMD Guidelines (paragraphs 15-16 – adapted below in the context of MMFs), ESMA is of the view that the following specifications could be appropriate (please note that the last report is a full report with additional information such as the last reporting flag):

- “Liquidated MMF

*Liquidation processes may vary according to the type of MMFs managed and the jurisdiction of the MMF. Depending on the situations, the last report might not contain any information (where all the positions of the MMF have been unwound), or else the report might be complete. Indeed, in some cases, an MMF that enters into a liquidation procedure (administrative procedure) is no longer managed by the manager and the liquidation is instead carried out by a liquidator. In that case, the manager of the MMF should provide a report to the NCAs of the MMF for the MMF before the liquidator takes over the responsibility for the liquidation of the MMF.”*

67. In the context of the AIFMD, a Q&A (number 7) was also published in relation to the last AIF report before the AIF is liquidated. ESMA is of the view that a similar specification could also be included in the MMF Guidelines:

*“Managers of MMFs should submit the last MMF report not later than 30 days after the end of the quarter in which the MMF has been liquidated or put into liquidation”.*

## **XVI. Change of the manager of an MMF**

68. With respect to the change of the manager of an MMF, a number of elements could be specified, in order to complement the requirements included in the ITS and the article 37 of the MMF Regulation.

69. As in the AIFMD Guidelines (paragraph 14 – adapted below in the context of MMFs), ESMA is of the view that the following specifications could be appropriate:

“Change of the manager of the MMF

*When the manager of an MMF changes between two reporting dates, the former manager of the MMF should not report any information at the end of the reporting period. Rather, the information should be reported by the new manager of the MMF at the end of the reporting period covering the whole period based on information provided by the former manager of the MMF.*



## **XVII. Withdrawal of the authorization of an MMF**

70. With respect to the withdrawal of the authorization of an MMF, a number of elements could be specified, in order to complement the requirements included in the ITS and the article 37 of the MMF Regulation.

71. ESMA is of the view that the following specifications could be appropriate:

- *“Withdrawal of the authorization of an MMF*

72. In the context of the AIFMD, a Q&A (number 7) was also published in relation to the last AIF report before the AIF is liquidated. ESMA is of the view that a similar specification could also be included in the MMF Guidelines:

*“Managers of MMFs should submit the last MMF report not later than 30 days after the end of the quarter in which the MMF has been withdrawn its authorization”.*

## **XVIII. Granting of the authorization of an MMF due to a change of strategy of an existing non-MMF fund**

73. With respect to the granting of the authorization of an MMF due to a change of the strategy of the fund, a number of elements could be specified, in order to complement the requirements included in the ITS and the article 37 of the MMF Regulation.

74. ESMA is of the view that the following specifications could be appropriate:

*“Granting of the authorization of an MMF due to a change of the strategy of the fund*

*When the manager of a fund is granted the authorization of an MMF under the MMF Regulation for the purpose of that specific fund, due to a change of its strategy, the information should be reported starting from the date the fund get its MMF authorisation by the manager of this new MMF at the end of the reporting period covering that whole period.”*

## **XIX. Umbrella MMFs**

75. With respect to umbrella MMFs, a number of elements could be specified, in order to complement the requirements included in the ITS and the article 37 of the MMF Regulation.

76. As in the AIFMD Guidelines (paragraph 36 – adapted below in the context of MMFs), ESMA is of the view that the following specifications could be appropriate:

*“If an MMF takes the form of an umbrella AIF with several compartments or sub-funds, MMF-specific information should be reported at the level of the compartments or sub-funds.”*

77. In relation to umbrella MMFs, in the context of the AIFMD database, Q&A 62 specified that:

*“Should AIFMs always apply the same reporting frequency to AIFs that are sub-funds of the same umbrella AIFs? No. The reporting frequency of an AIF is not affected by the legal structure of the AIF. Each AIF, being sub-funds of the same umbrella AIFs or not, has to be treated separately for the purpose of the reporting obligations (including for the reporting frequency)”.*

78. ESMA is of the view that a similar specification could also be included in the MMF Guidelines:

*“The reporting frequency of an MMF is not affected by the legal structure of the MMF. Each MMF, being sub-funds of the same umbrella MMFs or not, has to be treated separately for the purpose of the reporting obligations (including for the reporting frequency).”*

**Question to stakeholders:**

**Q6: Do you identify any other issue that would need to be specified in relation to the above section on the block 1 of the reporting template?**

## Block 2 – Portfolio indicators

79. Firstly, ESMA reminds managers of MMFs that, as specified in the ITS, given in particular the limitation rules set on MMF leverage and the short-term nature of the assets they invest in, and the short-term nature of MMFs, “*for the purpose of the reporting template under the MMF Regulation, it is considered that the total value of assets equals the NAV – please see field A.4.1)*”. This applies to the requirements of the article 37 of the MMF Regulation and it should be noted that this differs from the requirements under the AIFMD, which apply to a much broader set of investment funds (please see in particular the definition of an AIF in article 4 of the AIFMD).

### XX. Portfolio liquidity profile (field A.4.7)

80. With respect to the portfolio liquidity profile, a number of elements could be specified, in order to complement the requirements included in the ITS and the article 37 of the MMF Regulation.

81. As in the AIFMD Guidelines (paragraph 118 – adapted below in the context of MMFs), ESMA is of the view that the following specifications could be appropriate:

*“Managers of MMFs should report the percentage of the fund’s portfolio that is capable of being liquidated within each of the liquidity periods specified. Each asset should be assigned to one period only and such assignment should be based on the shortest period during which such a position could reasonably be liquidated at or near its carrying value. The total should equal 100%.*

*If individual positions are important contingent parts of the same trade, managers of MMFs should group all of these positions under the liquidity period of the least liquid part.”*

82. In addition, in the context of the AIFM database, the following Q&A(42) has been published:

*“Should AIFMs take into account the settlement period when they report information on portfolio liquidity (questions 178 to 184 of the consolidated reporting template for AIF-specific information)? Answer 42: AIFMs should adopt a conservative approach when they report information on the portfolio liquidity. As a consequence, AIFMs should take into account the time delay for having the proceeds of the sale available on a cash account if it has as a non-negligible impact on the liquidity profile of the AIF”.*

83. ESMA is of the view that a similar specification is also appropriate in the context of the MMF database and should be included in the corresponding MMF Guidelines:

*“Managers of MMFs should adopt a conservative approach when they report information on the portfolio liquidity. As a consequence, managers of MMFs should take into account the time delay for having the proceeds of the sale available on a cash account if it has as a non-negligible impact on the liquidity profile of the MMF”.*

**Question to stakeholders:**

**Q7: Are you of the view that the abovementioned specification leaves too much room for interpretation and would lead to data that is not comparable? Are you of the view that settlement periods should be taken into account and that, as a consequence, the last part of the abovementioned specification (“if it has as a non-negligible impact on the liquidity profile of the MMF”) should be removed?**

**XXI. Cumulative returns (field A.4.8)**

84. With respect to cumulative returns (field A.4.8), a number of elements could be specified, in order to complement the requirements included in the ITS and the article 37 of the MMF Regulation.

85. First, for consistency purposes, ESMA would encourage managers of MMFs to report in the field A.4.8 the same figure of cumulative returns that they already report to their investors. Secondly, it should be made clear that the figure of cumulative returns to be reported in field A.4.8 should be net returns:

*“With respect to field A.4.8 of the ITS, the figure of cumulative returns to be reported should be net returns. The manager of an MMF shall report the cumulative returns of the most representative share class, as defined under field A.6.9.”*

**XXII. Performance of the most representative share class (field A.4.9)**

86. According to the field A.4.9 of the ITS, the manager of an MMF shall report the calendar year performance of the most representative share class.

87. ESMA is of the view that the MMF Guidelines should specify what is meant by the “most representative share class”. ESMA is of the view that the most representative share class should be the share class associated with the highest NAV proportion or so:

*“With respect to field A.4.9 of the ITS on the calendar year performance of the most representative share class, the most representative share class should be understood as the share class associated with the highest NAV proportion or so at the end of the reporting period. In addition, no data should be reported when the inception date of the MMF was less than 12 months before the reporting end date.”*

**XXIII. Monthly portfolio volatility and Monthly portfolio volatility of the shadow NAV (when applicable) (field A.4.10)**

88. With respect to monthly portfolio volatility and monthly portfolio volatility of the shadow NAV (when applicable) (field A.4.10), a number of elements could be specified, in order to complement the requirements included in the ITS and the article 37 of the MMF Regulation.

89. First, it should be specified that the reporting of the monthly portfolio volatility of the shadow NAV is not relevant for VNAV MMFs:

*“With respect to monthly portfolio volatility and monthly portfolio volatility of the shadow NAV (when applicable) (field A.4.10), which should be understood as the “NAV per unit or share in accordance with Article 30” as referred to in articles 31(4) and 32(4) of the MMF Regulation, the reporting of the monthly portfolio volatility of the shadow NAV is not relevant for VNAV MMFs.”*

90. In addition, ESMA is of the view that the way the monthly portfolio volatility should be calculated should also be specified, given in particular that volatility is a statistical indicator that measures an asset’s variations around its average value:

$$\sigma_f = \sqrt{\frac{m}{T-1} \sum_{t=1}^T (r_t - \bar{r})^2}$$

where the return of the fund ( $r_t$ ) is calculated over  $T$  periods with a duration of  $1 / m$  years, for a period of three years.

$m = 12$  and  $T = 36$  for the calculation of the monthly return

and where  $\bar{r}$  is the arithmetic mean of the monthly return rates, as applicable, of the fund over  $T$  periods (not considering subscription and redemption fees) according to the following formula:

$$\bar{r} = \frac{1}{T} \sum_{t=1}^T r_t$$

**Question to stakeholders:**

**Q8: Do you have any views in relation to the abovementioned formula on how to measure the monthly portfolio volatility or are you of the view that another formula would be welcome?**

**Q9: Do you identify any other issue that would need to be specified in relation to the above section on the block 2 of the reporting template?**

## Block 3 – Stress tests

### XXIV. Results of stress tests (fields A.5.1 to A.5.10)

91. With respect to the results of stress tests (fields A.5.1 to A.5.10), a number of elements could be specified, in order to complement the requirements included in the ITS and the article 37 of the MMF Regulation.

92. Together with field A.7.7, field A.5.10 is the only field included in the ITS for which free text is allowed. In the context of the AIFMD database, Q&A 13 indicated that:

*“Apart from the sections on assumptions and stress tests, where text is allowed, the rest of the information to be reported will consist of figures, predetermined values or names of counterparties. For assumptions and stress tests, ESMA recommends that the national competent authority allow AIFMs to report the information in English, which would allow multinational groups to centralise and harmonise their AIFMD reporting.”*

93. ESMA is of the view that in relation to the abovementioned field A.5.10, a similar specification could be included in the Guidelines:

*“Apart from field A.5.10 on the proposed action plan in relation to stress tests, where free text is allowed, the rest of the information to be reported will consist of figures, predetermined values or names. For field A.5.10, ESMA recommends that the national competent authority allow managers of MMFs to report the information in English, which would allow multinational groups to centralise and harmonise their MMF reporting.”*

94. In addition, given that stress tests should be carried by managers of MMF at least twice a year (under article 28(3) of the MMF Regulation), and given that reports should be sent by managers of MMFs to National competent authorities on a quarterly basis (except for MMFs referred to in the second paragraph of Article 37(1) of the MMF Regulation) ESMA is of the view that it should be clarified how the fields A.5.1 to A.5.10 should be filled in the quarters when no stress tests have been carried. ESMA is of the view that managers of MMFs should fill in these fields quarterly and indicate the date when the stress tests the result of which they report was carried. In order to allow the results of the stress tests to be fully comparable, one of these dates should be the last day of the year:

*“With respect to fields A.5.1 to A.5.10, managers of MMFs should fill in these fields quarterly (even within the quarters when no stress tests have been carried) and indicate the date when the stress tests the results of which they report was carried. One of these dates should be the last day of the year. In the case of MMFs subject to yearly reporting, when several stress tests were performed during the yearly reporting period, only the last one should be reported.”*

95. The format of the results of the stress tests to be reported in fields A.5.1 to A.5.10 will be specified when there is more clarity on the common risk parameters related to these stress tests, which are to be specified by ESMA in the context of the Guidelines on MMF stress tests.

**Question to stakeholders:**

**Q10: Do you identify any other issue that would need to be specified in relation to the above section on the block 3 of the reporting template?**

## Block 4 – Information on the assets

**XXV. Asset description of the money market instrument (field A.6.2), eligible securitisation or ABCP (field A.6.21), unit or share of other MMF (field A.6.61), deposit or ancillary asset (field A.6.72) and repurchase agreement or reverse repurchase agreement (field A.6.82)**

96. With respect to the asset description of the money market instrument (field A.6.2), a number of elements could be specified, in order to complement the requirements included in the ITS and the article 37 of the MMF Regulation. Please see also see the specific section XXX above in relation to the field A.6.21 (asset description of the eligible securitisation or ABCP).

97. ESMA is of the view that this fields A.6.2, A.6.21, A.6.61, A.6.72 and A.6.82 should be filled in only if there does not exist ISIN nor LEI nor CFI code :

*“Field A.6.2 should be filled in only if there does not exist ISIN (field A.6.3) nor CFI code (field A.6.4) of the money market instrument. Field A.6.21 should be filled in only if there does not exist ISIN (field A.6.22) of the securitisation or asset backed commercial paper. Field A.6.61 should be filled in only if there does not exist ISIN (field A.6.62) nor LEI (field. A.6.63) nor CFI code (field A.6.64) of the unit or share of other MMF. Field A.6.72 should be filled in only if there does not exist ISIN (field A.6.73) nor CFI code (field A.6.74) of the deposit or ancillary asset. Field A.6.82 should be filled in only if there does not exist ISIN (field A.6.83) nor CFI code (field A.6.84) of the repurchase agreement or reverse repurchase agreement.”*

**XXVI. CFI (if available, and if the ISIN is not available) of the money market instrument (field A.6.4), financial derivative instrument (field A.6.43), unit or share of other MMF (field A.6.64), deposit or ancillary liquid asset (field A.6.74), repurchase agreement or reverse repurchase agreement (field A.6.84), and asset referred to in field B.1.3**

98. With respect to the CFI code to be provided for the different assets (field A.6.4, A.6.43, A.6.64, A.6.84, B.1.3), ESMA is of the view that in combination with an ISIN, the CFI should be provided, as both are assigned concurrently by the national numbering agencies. If the instrument does not possess an ISIN, ESMA is of the view that a CFI code should also be reported, as per the ISO 10962 standard. In this case, at least the first 2 characters of the CFI code and the character representing asset class (if applicable for a given instrument) shall be provided (ie. these characters cannot be "X", which represents not applicable or undefined value). To guide the reporting entities in the generation of a CFI, ESMA has compiled a mapping of the CFI code, englobing all eligible asset (Annex of the Guidelines).

99. With respect to the CFI code for deposit or liquid ancillary assets (field A.6.74), no CFI code shall be provided:

*“With respect to the CFI code to be provided for the different assets (field A.6.4, A.6.43, A.6.64, A.6.84, B.1.3), in combination with an ISIN, the CFI should be provided, as both are*



*assigned concurrently by the national numbering agencies. If the instrument does not possess an ISIN, a CFI code should also be reported, as per the ISO 10962 standard. In this case, at least the first 2 characters of the CFI code and the character representing asset class (if applicable for a given instrument) shall be provided (ie. these characters cannot be "X", which represents not applicable or undefined value). To guide the reporting entities in the generation of a CFI, ESMA has compiled a mapping of the CFI code, englobing all eligible asset (Annex) With respect to the CFI code for deposit or liquid ancillary assets (field A.6.74), no CFI code shall be provided."*

**Question to stakeholders:**

**Q11: With the respect to the CFI codes to be provided, do you identify any eligible asset not included in the table in the Annex of the Guidelines?**

**XXVII. Asset country (fields A.6.8, A.6.23, A.6.50, A.6.66, A.6.75, A.6.85)**

100. With respect to the country of the assets, a number of elements could be specified, in order to complement the requirements included in the ITS and the article 37 of the MMF Regulation.

101. In relation to this issue, the AIFMD guidelines (paragraph 82) specifies:

*"When reporting information on the geographical focus, AIFMs should look at the domicile of the investments made. The geographical regions are mutually exclusive and the sum of the percentages should equal 100%. The information should be reported as of the last business day of the reporting period.*

*Investments that do not have a predominant geographical focus should be included in the category "supranational/multiple regions". AIFMs may allocate investments in underlying collective investment schemes to a specific region if they have sufficient information on the portfolio of the collective investment scheme; if not, they should be allocated to the category supranational/multiple regions.*

*For financial derivative instruments (OTC and listed derivatives), the domicile should be the domicile of the underlying assets of the financial derivative instrument. For cash-like bank deposits, the domicile should be based on the currency in which the deposit is denominated. For instance, the domicile of a cash deposit in Euro in a US bank should be Europe."*

102. In the context of the MMF ITS:

Field A.6.8 specifies that the country of the Money market instrument is the country of the issuer of the Money market instrument;

Field A.6.23 specifies that the country of the eligible securitisation and asset backed commercial paper is the country of the sponsor of eligible securitisation and asset backed commercial paper;

Field A.6.50 does not further specify what should be the country of the financial derivative instrument;

Field A.6.66 does not further specify what should be the country of the unit or share of other MMF;

Field A.6.75 does not further specify what should be the country of the deposit or ancillary liquid asset;

Field A.6.85 does not further specify what should be the country of the repurchase agreement or reverse repurchase agreement.

103. The abovementioned paragraph of the AIFMD guidelines could therefore be amended as follows in the case of the MMF Guidelines:

*“When reporting information on the geographical focus of the different types of assets, the information should be reported as of the last day of the reporting period (if the information is not available on that last day, managers of MMFs should use the last information available on this topic). Assets that do not have a predominant geographical focus should be included in the category “supranational/multiple regions”.*

*For eligible securitisation and asset backed commercial paper (field A.6.23), if there is no sponsor, the country of the originator should be indicated. ”*

*As per field A.6.8, the country of a money market instrument is the country of the issuer of the money market instrument.*

*In alignment with the above, for financial derivative instruments (OTC and listed derivatives), the country of the financial derivative instrument (field A.6.50) shall be the country of the counterparty of the financial derivative instrument.*

*For deposit or ancillary liquid asset, the country (field A.6.75) should be based on the domicile of the entity in which the deposit is deposited. For instance, the domicile of a cash deposit in Euro in a US bank should be the US.*

*For repurchase agreement or reverse repurchase agreement, the domicile should be the domicile of the counterparty to the repurchase agreement or reverse repurchase agreement.”*

**Question to stakeholders:**

**Q12: Do you agree with the proposals of ESMA in relation to the domicile of the abovementioned assets? Are you of the view that**

**Q13: Do you agree that a category “supranational/multiple regions” should be included in the potential geographical areas to be chosen? If yes, could you provide examples of assets for which you would choose that category?**

**XXVIII. Clean price of the money market instrument (A.6.12 and A.6.13), eligible securitisation or asset backed commercial paper (A.6.30 and A.6.31)**

104. With respect to the clean price of the money market instrument (A.6.12 and A.6.13), a number of elements could be specified, in order to complement the requirements included in the ITS and the article 37 of the MMF Regulation.

105. ESMA is of the view that this field should always be reported in absolute terms (not in percentages):

*“With respect to the clean price of the money market instrument (A.6.12 and A.6.13), eligible securitisation or asset backed commercial paper (A.6.30 and A.6.31) these fields should always be reported in absolute terms (in monetary values, not in percentages). Accrued interests (A.6.14, A.6.15, A.6.32, A.6.33) and Total market values (A.6.16, A.6.17, A.6.34, A.6.35) should also always be reported in absolute terms (in monetary values, not in percentages).”*

106. ESMA is also of the view that it should be clarified which “base currency” is to be used when filling in field A.6.13 (and all similar fields in the reporting template: A.6.15, A.6.17, A.6.31, A.6.33, A.6.35, A.6.53, A.6.55, A.6.57, A.6.68, A.6.71, A.6.81, A.6.92, A.6.94, A.6.98): the currency of the asset or the currency of the fund. An example of this issue is the following case: a USD bond hold by a Swedish fund that has a SEK share.

107. In the first Option, the price shall be expressed in the currency of the instrument (e.g. USD in the basis case, and not SEK). Then, the A.6.14 EUR field will be filled by converting the A.6.13 field USD amount in EUR using ECB rate. In that option, “base currency” is to be understood as the Currency of the money market instrument (field A.6.10) and not the base currency of the MMF (field A.1.12)

108. In the second option, the price shall be expressed in the “base currency” (e.g. SEK in the basis case). Then, associated A.6.14 EUR field will be filled by converting the A.6.13 field SEK amount in EUR using ECB rate.

109. ESMA is seeking feedback from stakeholders on that specific point.

**Question to stakeholders:**

**Q14: Do you agree that the clean price of the money market instrument (A.6.12), this field should always be reported in absolute terms (in monetary values, not in percentages)? Which of the 2 abovementioned options on the “base currency” mentioned in field A.6.13 would you favour: currency of the asset or the currency of the MMF?**

**XXIX. Accrued interests (A.6.14 and A.6.15), Total market value of the money market instrument (A.6.16 and A.6.17), and the method used to price the money market instrument (A.6.18)**

110. With respect to Accrued interests (A.6.14 and A.6.15), Total market value of the money market instrument (A.6.16 and A.6.17), and the method used to price the money market instrument (A.6.18), a number of elements could be specified, in order to complement the requirements included in the ITS and the article 37 of the MMF Regulation.

111. ESMA is of the view that if the manager indicates that the method used to price the money market instrument (A.6.18) is “mark-to-model”, or “amortised cost”, it should not fill in the fields related to Accrued interests (A.6.14 and A.6.15), and the total market value of the money market instrument (A.6.16 and A.6.17) should be understood in that case as the Total value of the money market instrument:

*“With respect to fields A.6.14 to A.6.18, if the manager indicates that the method used to price the money market instrument (A.6.18) is “mark-to-model”, or “amortised cost”, it should not fill in the fields related to Clean price (A.6.12 and A.6.13) and Accrued interests (A.6.14 and A.6.15), and the total market value of the money market instrument (A.6.16 and A.6.17) should be understood in that case as the Total value of the money market instrument. If the manager indicates that the method used to price the money market instrument (A.6.18) is “mark to market”, the sum of the fields A.6.13 (clean price) and A.6.15 (accrued interests) should equal the field A.6.17 (total market value).”*

**Question to stakeholders:**

**Q15: With respect to fields A.6.23 to A.6.25, would you identify any cases where there is no sponsor of an eligible securitisation or asset backed commercial paper?**

**XXX. Asset description of the eligible securitisation or asset backed commercial paper (Field A.6.21)**

112. With respect to the asset description of the eligible securitisation or asset backed commercial paper (Field A.6.21), a number of elements could be specified, in order to complement the requirements included in the ITS and the article 37 of the MMF Regulation.

113. In particular, ESMA is of the view that one element should be reported in this field, corresponding to the securitisation identifier as reported by the sponsor (originator and SPV to ESMA under STS Regulation<sup>10</sup>). ESMA is of the view that the securitisation identifier should be of the format "Securitisation Repository LEI", then a hyphen, and a unique identifier for the securitisation generated and assigned by the securitisation repository. This should be a mandatory identifier for asset classification "STS":

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<sup>10</sup> <https://ec.europa.eu/transparency/regdoc/rep/3/2018/EN/C-2018-2080-F1-EN-MAIN-PART-1.PDF>

*“With respect to, managers should asset description of the eligible securitisation or asset backed commercial paper (Field A.6.21), managers should report the securitisation identifier using the format "Securitisation Repository LEI", then a hyphen, and a unique identifier for the securitisation generated and assigned by the securitisation repository. This is a mandatory identifier for assets classified as "STS" as mentioned in Regulation 2017/1131”.*

### **XXXI. Contract type of derivative contract (Field A.6.39)**

114. With respect to the contract type of derivative contract (Field A.6.39), a number of elements could be specified, in order to complement the requirements included in the ITS and the article 37 of the MMF Regulation

115. In order to fill in this field, managers of MMFs should use the typology of contract types taken from the reporting instructions of the FIRDS Reference Data System

*“With respect to the contract type of derivative contract (Field A.6.39), managers should use the following typology of contract types:*

- *CFDS' for Contracts for difference*
- *'FORW' for forwards*
- *'FRAS' for Forward Rate Agreements*
- *'FWOS' Forwards on a swap*
- *'FUTR' for futures*
- *'FONS' for Futures on a swap*
- *'OPTN' for options*
- *'OTHR' for other*
- *'SWAP' for swaps*
- *'SWPT' for swaption”*

**Question to stakeholders:**

**Q16: Do you identify other potential contract types that would need to be included in the list above in relation to field A.6.39?**

### **XXXII. Name of the underlying (Field A.6.45)**

116. With respect to the name of the underlying (Field A.6.45), a number of elements could be specified, in order to complement the requirements included in the ITS and the article 37 of the MMF Regulation.
117. ESMA is of the view that further specification on what should be the name of the underlying as referred to in Field A.6.45 could be useful (e.g. short name or full name) but would like to hear the views of market participants on such an issue.

#### **Question to stakeholders**

**Q17: Do you see merits in clarifying what should be the name of the underlying as referred to in Field A.6.45? If yes, which specifications would you expect?**

### **XXXIII. Exposure of the repurchase agreement or a reverse repurchase agreement (Field A.6.91 and A.6.92)**

118. With respect to exposure of the repurchase agreement or a reverse repurchase agreement (Field A.6.91 and A.6.92), a number of elements could be specified, in order to complement the requirements included in the ITS and the article 37 of the MMF Regulation.
119. In particular, ESMA is of the view that it should be specified that the exposure referred to in fields A.6.91 and A.6.92 is gross exposure.

*“With respect to exposure of the repurchase agreement or a reverse repurchase agreement (Field A.6.91 and A.6.92), the exposure referred to in these fields is gross exposure. With respect to repurchase agreement, the gross exposure should be understood as the market value of the securities sold to the counterparties of the repo transactions (in exchange of the cash received) should be reported, without taking into account any netting effects and without considering the collateral received in order to mitigate the counterparty risk arising from these transactions. With respect to reverse repurchase agreement, the gross exposure should be understood as the value of the cash paid to the counterparties of reverse repo transactions (in exchange of securities bought) should be reported, without taking into account any netting effects and without considering the collateral received in order to mitigate the counterparty risk arising from these transactions.”*

**Q18: Are you of the view that ESMA should further specify what is meant by “exposure” in fields A.6.91 and A.6.92? If yes, which types of specifications would you suggest?**

**Q19: Do you identify any other issue that would need to be specified in relation to the above section on the block 4 of the reporting template? In particular, in your view, how would the NAV of the MMF compare to the sum of the values of the fields on total market values (and quantity) of money market instruments, securitisation and ABCP, financial derivative instrument, unit or share of other MMF, deposit or ancillary liquid asset, repurchase agreement and reverse repurchase agreement (A.6.16 and A.6.11, A.6.34**

and A.6.29, A.6.54, A.6.67 and A.6.69, A.6.80, A.6.91)? Do you have any comments on the table “*CFI codes for eligible securities*” included in the annex of the Guidelines?

## Block 5 – Information on the liabilities

### XXXIV. Investor concentration (field A.7.2)

120. With respect to investor concentration, a number of elements could be specified, in order to complement the requirements included in the ITS and the article 37 of the MMF Regulation.

121. As in the AIFMD Guidelines (paragraph 100 – adapted below in the context of MMFs), ESMA is of the view that the following specifications could be appropriate:

*“With respect to investor concentration (field A.7.2), for MMFs with several unit or share classes, managers of MMFs should consider the percentage of these units or shares in relation to the NAV of the MMF in order to be able to aggregate the percentages of professional investors and retail investors in the MMF. The total should equal 100%. The totals in fields A.7.3 and A.7.4 should also equal 100%. ”*

122. With respect to the breakdown of investors, field A.7.2 of the ITS specifies that the information provided should take the form of “estimates if no precise information is available”. ESMA is of the view that the manager of an MMF should therefore specify the percentage of the provided information (on both professional clients and retail investors) which is an estimate, so that NCAs and ESMA are aware of the magnitude of the provided information which, as opposed, not an estimate but a more certified figure.

*“With respect to field A.7.2, the manager of an MMF should also specify the percentage of the NAV on both i) professional clients and ii) retail investors, which is an estimate. There would therefore be four fields to be filled in: i) % of NAV of professional clients, which is not an estimate ii) % of NAV of professional clients, which is an estimate iii) % of NAV of retail clients, which is not an estimate iv) % of NAV of retail clients, which is an estimate. ”*

123. Two corresponding additional subfields will be included in the field of the reporting template to be filled in by manager of MMFs corresponding to the field A.7.2 of the ITS.

124. In particular, *“ESMA is of the view that further specification on which issuer group taxonomy as provided by the European Central Bank is corresponding to the issuer category as referred to in field A.6.86 may be useful.*

*- Issuer categories “Sovereign (EU)” together with “Sovereign (non-EU)” are corresponding to “Central government” under IG2 code;*

*- Issuer categories “EU Central Bank” together with “non-EU central bank” are corresponding to “Central bank” under IG1 code;*

*- Issuer categories “National Public Body” together with “EU Public Body (excluding National Public Body)” and “Non-EU public body” are corresponding to “Public Corporation” under IG11 code;*



- Issuer categories “Supranational Public Body (EU)” together with “Supranational Public Body (other than EU)” are corresponding to “Supranational issuer” under IG6 code;
- Issuer category “Credit Institution” is corresponding to “Credit institution (excluding agencies)”, “Agency - non credit institutions” and “Agency - credit institution” under IG4, IG7 and IG8 codes;
- Issuer category “Other financial corporations” is corresponding to “Financial corporations other than credit institutions” under IG9 code; and
- Issuer category “Non-financial corporations” is corresponding to “Corporate and other issuers” under IG3 code.
- Issuer categories “EU Central Bank” together with “non-EU central bank” is corresponding to “Central bank” under IG1 code

#### **XXXV. Investor group breakdown (field A.7.3)**

125. With respect to the breakdown of the ownership of units / shares in the MMF by investor group, a number of elements could be specified, in order to complement the requirements included in the ITS and the article 37 of the MMF Regulation.
126. First, ESMA is of the view that what is meant by “beneficial owner” in fields A.7.1 and A7.3 should be further specified:
- “Beneficial owners’ as referred to in fields A.7.1 and A.7.3 should be considered at the level of the legal entity and not at the level of the parents company”.*
127. In addition, “The following list indicates which institutional sector of the economy in accordance with the European System of accounts (ESA) 2010 manual is corresponding to the investor group as referred to in field A.7.3:
- - Investor group “Non-financial corporations” is corresponding to “Non-financial corporations” under S11 code
  - Investor group “Banks” is corresponding to “monetary financial institutions (MFIs)” under S12K code
  - Investor group “Insurance corporations” is corresponding to “Insurance corporations” under S128 code
  - Investor group “Other financial institutions” is corresponding to “Other financial institutions” under S12O
  - Investor group “Pension plans / funds” is corresponding to “Pension funds” under S129 code

- Investor group “General government” is corresponding to “General government” under S13 code
- Investor group “Other collective investment undertakings” is corresponding to “Non-MMF investment funds” under S124 code
- Investor group “Households” is corresponding to “households and non-profit institutions serving households” under S14 and S15 codes
- Investor group “Unknown” is corresponding to “Unspecified” under S1N code
- The “Rest of the world” under S2 code may not be linked directly to the investor group list as referred to in field A.7.3”

#### **XXXVI. Notice period required by investors (Field A.7.6)**

128. In field A.7.6 of the ITS, the notice period required by investors for redemptions is to be filled in days. ESMA is of the view that the MMF Guidelines should specify that if there are multiple classes of shares or units, the notice period reported should be the one of the largest share class (associated with the highest NAV proportion or so). It should also be specified that bank working days should be taken into account when filling in the field A.7.6 in “days”:

*“With respect to field A.7.6 of the ITS, if there are multiple classes of shares or units, the notice period reported should be the one of the largest share class (associated with the highest NAV proportion or so). In addition, bank working days should be taken into account when filling in the field A.7.6 in “days”.*

#### **XXXVII. Liquidity arrangements (Field A.7.7)**

129. With respect to liquidity arrangements (field A.7.7), a number of elements could be specified, in order to complement the requirements included in the ITS and the article 37 of the MMF Regulation.

130. In field A.7.7, it is in particular mentioned that managers of an MMF could indicate if there are some “Other arrangements for managing illiquid assets” in relation to this MMF. ESMA is of the view that it should be indicated to managers that if there are no such other arrangements, managers should include “0” in the field “% of NAV” related to that specific field:

*“In field A.7.7, the manager of an MMF is to indicate if there are some “Other arrangements for managing illiquid assets” in relation to this MMF. If there are no such other arrangements, the manager of an MMF should include “0” in the field “% of NAV” related to that specific field”*

**XXXVIII. Information on the liabilities of the MMF: subscriptions (A.7.9), redemptions (A.7.10), payments to investors (A.7.11), exchange rate (A.7.12)**

131. With respect to subscriptions, ESMA is of the view that the date of subscription to be taken into account when filling in the report (field A.7.9) should be the date when the share of the MMF is issued, and not the day when the corresponding amount is paid to the MMF. The MMF guidelines could therefore include the corresponding specification:

*“With respect to subscriptions, the date of subscription to be taken into account when filling in the MMF reporting template (field A.7.9) should be the date when the share of the MMF is issued, and not the day when the corresponding amount of the share is actually paid to the MMF”*

132. With respect to redemptions, ESMA is of the view that the date of redemption to be taken into account when filling in the report (field A7.10) should be the date when the share of the MMF is redeemed, and not the day when the corresponding amount is received from the MMF. The MMF guidelines could therefore include the corresponding specification:

*“With respect to redemptions, the date of redemption to be taken into account when filling in the MMF reporting template (field A7.10) should be the date when the share of the MMF is redeemed, and not the day when the corresponding amount of the share is actually received from the MMF”*

133. With respect to payments to investors (A.7.11), ESMA is of the view that it should be specified that these payments include dividends:

*“Payments to investors as referred to in field A.7.11 include dividends.”*

134. With respect to the exchange rate referred to in field A.7.12, ESMA is of the view that it should be specified that this reported exchange rate should be the exchange rate at the end of the month corresponding to the reporting of fields A.7.8, A.7.9 and A.7.11 or, if not available at that date, the preceding last available exchange rate. This same exchange rate should be used when filling in EUR all fields A.7.8, A.7.9 and A.7.11. The MMF guidelines could therefore include the corresponding specification:

*“With respect to the exchange rate referred to in field A.7.12, this reported exchange rate should be the exchange rate at the end of the month corresponding to the reporting of fields A.7.8, A.7.9 and A.7.11 or, if not available at that date, the last preceding available exchange rate. This same exchange rate should be used when filling in EUR all fields A.7.8, A.7.9 and A.7.11.”*

**Question to stakeholders:**



**Q20: Do you identify any other issue that would need to be specified in relation to the above section on the block 5 of the reporting template?**

## Block 6 – Information on LVNAV

**XXXIX. Information on the price referred to fields B.1.4, B.1.5 (price when the event occurs, using the amortised cost method with respect to B.1.5), B.1.8 (minimum price deviation between two values referred to in field B.1.8) and the average difference between two values referred to in field B.1.7**

135. With respect to the price referred to fields B.1.4 and B.1.5 (price when the event occurs, using the amortised cost method with respect to B.1.5), ESMA is of the view that the currency (EUR) in which this price is expressed could be specified:

*“With respect to the price referred to fields B.1.4 and B.1.5 (price when the event occurs, using the amortised cost method with respect to B.1.5), the currency in which this price is expressed should be EUR.”*

136. With respect to the difference referred to in fields B.1.7, B.1.8., a number of elements could be specified, in order to complement the requirements included in the ITS and the article 37 of the MMF Regulation

*“With respect to the difference referred to in fields B.1.7 and B.1.8., the figures should be expressed in basis points.”*

**Question to stakeholders:**

**Q21: Do you identify any other issue that would need to be specified in relation to the above section on the block 6 of the reporting template?**



## 4 Annexes

### 4.1 Annex I

#### Summary of questions

- Q1** Are you of the view that there could be merits for managers of MMFs subject to yearly reporting in accordance with article 37(1) of the MMF Regulation to report on a quarterly basis so that their corresponding operational process is less burdensome?<sup>11</sup>
- Q2** Do you identify potential situations in which managers of MMFs do not have any information to report on MMFs other than those listed above (e.g. certain types of situations of liquidation of the MMF)?
- Q3** Do you agree that the MMF Guidelines could specify which sources should be used by managers of MMFs if the base currency is not included in the list of currencies for which the ECB provides an exchange rate? If yes, which sources should be used in your view?
- Q4** Do you identify any other issue that would need to be specified in relation to the above section on “general principles” of the reporting template?
- Q5** Do you agree that if an MMF is composed of different share classes that differ in relation to their base currency the base currency that should be included in field A.1.12 should be the base currency as specified in the accounting documents of the MMF or are you of the view that in that case the base currency of the largest share class should be included in field A.1.12? Would you see merit in aligning the inception date mentioned above in section X with the first reporting date, as defined in section II?
- Q6** Do you identify any other issue that would need to be specified in relation to the above section on the block 1 of the reporting template?
- Q7** Are you of the view that the abovementioned specification leaves too much room for interpretation and would lead to data that is not comparable? Are you of the view that settlement periods should be taken into account and that, as a consequence, the last part of the abovementioned specification (“*if it has as a non-negligible impact on the liquidity profile of the MMF*”) should be removed?

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<sup>11</sup> This option has legal support on the second subparagraph of Article 37 (1) where it is established that for an MMF whose assets under management in total do not exceed EUR 100 000 000, the manager of the MMF shall report to the competent authority of the MMF **on at least** an annual basis.

- Q8 Do you have any views in relation to the abovementioned formula on how to measure the monthly portfolio volatility or are you of the view that another formula would be welcome?**
- Q9 Do you identify any other issue that would need to be specified in relation to the above section on the block 2 of the reporting template?**
- Q10 Do you identify any other issue that would need to be specified in relation to the above section on the block 3 of the reporting template?**
- Q11 With the respect to the CFI codes to be provided, do you identify any eligible asset not included in the table in the Annex of the Guidelines?**
- Q12 Do you agree with the proposals of ESMA in relation to the domicile of the abovementioned assets?**
- Q13 Do you agree that a category “supranational/multiple regions” should be included in the potential geographical areas to be chosen? If yes, could you provide examples of assets for which you would choose that category?**
- Q14 Do you agree that the clean price of the money market instrument (A.6.12), this field should always be reported in absolute terms (in monetary values, not in percentages)? Which of the 2 abovementioned options on the “base currency” mentioned in field A.6.13 would you favour: currency of the asset or the currency of the MMF?**
- Q15 With respect to fields A.6.23 to A.6.25, would you identify any cases where there is no sponsor of an eligible securitisation or asset backed commercial paper?**
- Q16 Do you identify other potential contract types that would need to be included in the list above in relation to field A.6.39?**
- Q17 Do you see merits in clarifying what should be the name of the underlying as referred to in Field A.6.45? If yes, which specifications would you expect?**
- Q18 Are you of the view that ESMA should further specify what is meant by “exposure” in fields A.6.91 and A.6.92? If yes, which types of specifications would you suggest?**
- Q19 Do you identify any other issue that would need to be specified in relation to the above section on the block 4 of the reporting template?**
- Q20 Do you identify any other issue that would need to be specified in relation to the above section on the block 5 of the reporting template? In particular, in your view, how would the NAV of the MMF compare to the sum of the values of**



**the fields on total market values (and quantity) of money market instruments, securitisation and ABCP, financial derivative instrument, unit or share of other MMF, deposit or ancillary liquid asset, repurchase agreement and reverse repurchase agreement (A.6.16 and A.6.11, A.6.34 and A.6.29, A.6.54, A.6.67 and A.6.69, A.6.80, A.6.91)? Do you have any comments on the table “*CFI codes for eligible securities*” included in the annex of the Guidelines?**

**Q21 Do you identify any other issue that would need to be specified in relation to the above section on the block 6 of the reporting template?**

## 4.2 Annex II

### **Legislative reference related to the ITS on the establishment of a reporting template under article 37 of the MMF Regulation, and to the central data base on MMFs**

Under the requirements of Article 37(4) of the MMF Regulation ESMA is required to develop draft ITS to establish a reporting template.

Article 37 of the MMF regulation provides that:

#### *Reporting to competent authorities*

1. For each MMF that it manages, the manager of the MMF shall report information to the competent authority of the MMF on at least a quarterly basis.

By way of derogation from the first subparagraph, for an MMF whose assets under management in total do not exceed EUR 100 000 000, the manager of the MMF shall report to the competent authority of the MMF on at least an annual basis.

The manager of an MMF shall upon request provide the information reported pursuant to the first and second subparagraphs also to the competent authority of the manager of an MMF, if different from the competent authority of the MMF.

2. The information reported pursuant to paragraph 1 shall comprise the following points:

(a) the type and characteristics of the MMF;

(b) portfolio indicators such as the total value of assets, NAV, WAM, WAL, maturity breakdown, liquidity and yield;

(c) the results of stress tests and, where applicable, the proposed action plan;

(d) information on the assets held in the portfolio of the MMF, including:

(i) the characteristics of each asset, such as name, country, issuer category, risk or maturity, and the outcome of the internal credit quality assessment procedure

(ii) the type of asset, including details of the counterparty in the case of derivatives, repurchase agreements or reverse repurchase agreements;

(e) information on the liabilities of the MMF, including:

(i) the country where the investor is established;

(ii) the investor category;

(iii) subscription and redemption activity.

If necessary and duly justified, competent authorities may solicit additional information.

3. In addition to the information referred to in paragraph 2, for each LVNAV MMF that it manages, the manager of an MMF shall report the following:

(a) every event in which the price of an asset valued by using the amortised cost method in accordance with the first subparagraph of Article 29(7) deviates from the price of that asset calculated in accordance with Article 29(2), (3) and (4) by more than 10 basis points;

(b) every event in which the constant NAV per unit or share calculated in accordance with Article 32(1) and (2) deviates from the NAV per unit or share calculated in accordance with Article 30 by more than 20 basis points;

*(c) every event in which a situation mentioned in Article 34(3) occurs and the measures taken by the board in accordance with points (a) and (b) of Article 34(1).*

*4. ESMA shall develop draft implementing technical standards to establish a reporting template that shall contain all the information referred to in paragraphs 2 and 3.*

*ESMA shall submit those draft implementing technical standards to the Commission by ...[six months after the date of entry into force of this Regulation].*

*Power is conferred on the Commission to adopt the implementing technical standards referred to in the first subparagraph in accordance with Article 15 of Regulation (EU) No 1095/2010.*

*5. Competent authorities shall transmit to ESMA all information received pursuant to this Article. Such information shall be transmitted to ESMA no later than 30 days after the end of the reporting quarter.*

*ESMA shall collect the information to create a central database of all MMFs established, managed or marketed in the Union. The European Central Bank shall have a right of access to that database, for statistical purposes only*

## 4.3 Annex III

### Cost-benefit analysis

#### 1. Introduction

137. The MMF Regulation sets out a comprehensive framework for the regulation of MMFs within Europe. MMFs are AIFs or UCITS that are managed by alternative investment fund managers (AIFMs) or UCITs management companies or investment companies

138. The MMF Regulation establishes uniform rules regarding MMFs. It mandates ESMA to develop a reporting template related to the reporting of information on MMFs to competent authorities.

139. This draft CBA is qualitative in nature. Should relevant data be received through the consultation process, ESMA will take it into account when finalising its guidelines and will include it in the CBA accompanying the final report.

#### 2. Technical options

140. The following options were identified and analysed by ESMA to address the policy objectives of the guidelines required under the MMF Regulation.

141. In identifying the options set out below and choosing the preferred ones, ESMA was guided by the relevant MMF Regulation rules.

##### Policy Objective

The MMF Regulation (**Article 37**) obliges, for each MMF managed, the manager of the MMF to report information to the competent authority of the MMF, at least on a quarterly basis. The frequency of reporting is annual in the case of a MMF whose assets under management in total do not exceed EUR 100 million.

These reports need to include a number of elements listed in the Regulation, and ESMA is required to develop draft implementing technical standards (ITS) to establish a reporting template that contains the relevant information. ESMA has to submit those draft ITS to the Commission by 6 months after the entry into force of the Regulation.

Under the requirements of Article 37(4) of the MMF Regulation ESMA is required to develop draft ITS to establish a reporting template that contains for each MMF the following information:

(a) the type and characteristics of the MMF;

(b) portfolio indicators such as the total value of assets, NAV, WAM, WAL, maturity breakdown, liquidity and yield;

(c) the results of stress tests and where applicable the proposed action plan;

(d) information on the assets held in the portfolio of the MMF:

(i) the characteristics of each asset, such as name, country, issuer category, risk or maturity, and the outcome of the internal credit assessment procedure;

(ii) the type of asset, including details of the counterparty in the case of derivatives, repurchase agreements or reverse repurchase agreements;

(e) information on the liabilities of the MMF that includes the following points:

(i) the country where the investor is established;

(ii) the investor category;

(iii) subscription and redemption activity.

Under the requirements of Article **37(4)** of the MMF Regulation ESMA is also required to develop draft ITS to establish a reporting template that contains for each LVNAV MMF (in addition to the information mentioned in the previous paragraph) the following information:

(a) every event in which the price of an asset valued by using the amortised cost method in accordance with the first subparagraph of Article 29(7) deviates from the price of that asset calculated in accordance with Article 29(2), (3) and (4) by more than 10 basis points;

(b) every event in which the constant NAV per unit or share calculated in accordance with Article 32(1) and (2) deviates from the NAV per unit or share calculated in accordance with Article 30 by more than 20 basis points;

(c) every event in which a situation mentioned in Article 34(3) occurs and the measures taken by the board in accordance with points (a) and (b) of Article 34(1).

The Guidelines discussed in the present CP aim at specifying the different fields of this reporting template.

<p><b>Baseline scenario</b></p>	<p>The baseline scenario should be understood for this CBA as the application of the requirements in the Level 1 Regulation (i.e. the provisions of Article 37 of the MMF Regulation) and the level 2 (i.e. the abovementioned published ITS) without any further specification. This would leave discretion to managers of MMF to determine the abovementioned contents and format of the reporting template. This could clearly lead to a significant lack of harmonisation in the application of the provisions of the MMF Regulation across the MMF industry on this issue.</p> <p>Indeed, uncertainty on the abovementioned requirement could lead to a situation where some Member States would adopt stricter rules than others on the choice of the abovementioned contents and format of the reporting template. For instance, some Member States could consider that only specific types of information might be included in the abovementioned reporting template. This would be particularly problematic in the context of the EU passport of the AIFMD/UCITS Directive.</p>
<p><b>Option 1</b></p>	<p>The Guidelines on the ITS would provide a detailed list of information that should be included in all fields of the reporting template included in the ITS. This option would not consider the reuse of the data submitted in the context of the AIFMD reporting template.</p>
<p><b>Option 2</b></p>	<p>The Guidelines on the ITS would provide a list of information that should be included in the reporting template. However this option would also consider the reuse of the data submitted in the context of the AIFMD reporting template.</p>
<p><b>Preferred Option</b></p>	<p>ESMA decided to consult on option 1 and discarded option 2. The baseline scenario (application of the requirements in the Level 1 Regulation and level 2 without any further specification) was also discarded.</p> <p>The main difference between options 1 and 2 is the extent to which the reporting template under the MMF Regulation would rely on the existing reporting template under the AIFMD. Having regard to the abovementioned similarities between the AIFMD database and the envisaged MMF one, one of the first key principles underlying the establishment of the required reporting template could indeed be to rely as much as possible on the work</p>

already done on the establishment of a reporting template in the case of the AIFMD database.

This would mean, in particular, that:

i) to the extent that this is possible from a legal standpoint, the same type of information should not be requested and expressed in two different ways in the two contexts of the AIFMD and MMF reporting requirements (e.g. the same types of indicators should be defined the same way); and

ii) a situation when the same manager would have to provide the same information both in the AIFMD and in the MMF database should be avoided, to the extent that this is possible from a purely IT/technical point of view.

However, there are a number of limitations to this exercise. First, the list of information to be provided by managers explicitly mentioned in the MMF Regulation differs to a large extent from the one included in the AIFMD database. Secondly, in some instances (e.g. the typology of assets) the typology of information, that is, the way the information has to be categorized, also differs as compared to the one included in the AIFMD database. Thirdly, the competent authority that will receive the reports under the MMF framework is the competent authority of the MMF (Article 37(1)) while for the same MMF (when this is an AIF) the competent authority that will receive the reports under the AIFMD framework is the competent authority of the AIFM (the manager of the MMF). In addition, the LEI, which could allow ESMA to identify the MMF(AIF) in such a situation, is not a mandatory requirement under the AIFMD reporting framework. Finally, the frequency of reporting may differ for a given MMF between the AIFMD and the MMF reporting requirements.

On the one hand, it is therefore suggested to apply as strictly as possible the principle expressed above (the same type of information should not be requested and expressed in two different ways in the AIFMD and MMF reporting requirements), even though it might be in some cases necessary to depart from this principle because of the different nature of the AIFMD and MMF databases. On the other hand, given the limitations described above, it is suggested to depart from the other principle included above, so that the two AIFMD and MMF databases would be dealt with separately

	ESMA therefore preferred option 1.
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### 3. Assessment of the impact of the various options

Option 1	Qualitative description
<b>Benefits</b>	<p>i) Standardise the information that should be included in the reporting template under the Article 37 of the MMF Regulation;</p> <p>ii) Prevent the manager of MMF from determining on his own the information that should be included in the reporting template under the Article 37 of the MMF Regulation (which would lead to uncertainty for investors and regulators, and less protection of the investors).</p> <p>ESMA seeks the views of stakeholders on the costs of imposing such criteria as suggested above.</p>
<b>Costs to regulator and compliance costs</b>	The costs linked to the implementation of this option seem to be limited to the costs for both regulators and managers of MMFs of setting up procedures to submit (and receive in the case of regulators) the abovementioned information.

Option 2	Qualitative description
<b>Benefits</b>	<p>i) Standardise the information that should be included in the reporting template under the Article 37 of the MMF Regulation;</p> <p>ii) Prevent the manager of MMF from determining on his own the information that should be included in the reporting template under the Article 37 of the MMF Regulation (which would lead to uncertainty for investors and regulators, and less protection of the investors);</p> <p>iii) Allow for a full reuse of the information already submitted in the context of the AIFMD reporting template.</p>
<b>Costs to regulator and compliance costs</b>	The costs linked to the implementation of this option seem to be limited to the costs for both regulators and managers of MMFs of setting up procedures to submit (and receive in the case of regulators) the abovementioned information. As compared to the option 1, these costs would be higher for regulators since, as mentioned above, regulators would not be able to directly connect the MMF and the AIFMD databases.



## **4.4 Annex IV (Guidelines on reporting under the MMF Regulation)**

### **I. Scope**

#### **Who?**

1. These guidelines apply to competent authorities and MMFs and managers of MMFs within the meaning of the MMF Regulation.

#### **What?**

2. These guidelines apply in relation to Article 37 of the MMF Regulation and the reporting template in the Annex of the Implementing Regulation on reporting.

#### **When?**

3. These updated guidelines apply from [dd month yyyy].

## II. Legislative references and abbreviations

### Legislative references

*ESMA Regulation* Regulation (EU) No 1095/2010 of the European Parliament and of the Council of 24 November 2010 establishing a European Supervisory Authority (European Securities and Markets Authority), amending Decision No 716/2009/EC and repealing Commission Decision 2009/77/EC<sup>12</sup>

*MMF Regulation* Regulation (EU) 2017/1131 of the European Parliament and of the Council of 14 June 2017 on money market funds<sup>13</sup>

*Implementing Regulation on reporting* Commission Implementing Regulation (EU) 2018/708 of 17 April 2018 laying down implementing technical standards with regard to the template to be used by managers of money market funds when reporting to competent authorities as stipulated by Article 37 of Regulation (EU) 2017/1131 of the European Parliament and of the Council<sup>14</sup>

### Abbreviations

<i>CP</i>	Consultation Paper
<i>ESMA</i>	European Securities and Markets Authority
<i>EU</i>	European Union
<i>MMF</i>	Money Market Fund

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<sup>12</sup> OJ L 331, 15.12.2010, p. 84.

<sup>13</sup> OJ L 169, 30.6.2017, p. 8.

<sup>14</sup> OJ L 119, 15.5.2018, p. 5.

### **III. Purpose**

4. These guidelines are based on Article 16(1) of the ESMA Regulation. The objectives of these guidelines are to establish consistent, efficient and effective supervisory practices and to ensure the common, uniform and consistent application of Article 37 of the MMF Regulation and the Implementing Regulation on reporting. In particular, they aim to provide guidance on the contents of the fields of the reporting template included in the Annex of the Implementing Regulation on reporting.

## IV. Compliance and reporting obligations

### 4.5 Status of the guidelines

5. In accordance with Article 16(3) of the ESMA Regulation, competent authorities and financial market participants must make every effort to comply with these guidelines. Competent authorities to which these guidelines apply should comply by incorporating them into their national legal and/or supervisory frameworks as appropriate, including where particular guidelines are directed primarily at financial market participants. In this case, competent authorities should ensure through their supervision that financial market participants comply with the guidelines.

### 4.6 Reporting requirements

6. Within two months of the date of publication of the guidelines on ESMA's website in all EU official languages, competent authorities to which these guidelines apply must notify ESMA whether they (i) comply, (ii) do not comply, but intend to comply, or (iii) do not comply and do not intend to comply with the guidelines. In case of non-compliance, competent authorities must also notify ESMA within two months of the date of publication of the guidelines on ESMA's website in all EU official languages of their reasons for not complying with the guidelines. A template for notifications is available on ESMA's website. Once the template has been filled in, it shall be transmitted to ESMA. Financial market participants are not required to report .

## V. Specifications on the reporting template under Article 37 of the MMF Regulation

### 5.1 General principles

7. This section includes general principles that apply to the entire MMF reporting. It provides further guidance on reporting and reporting periods as well as the procedure for the first report.

#### 5.1.1 Reporting and submission periods

8. The reporting periods are aligned with the Trans-European Automated Real-time gross settlement.

9. **Express Transfer (TARGET) calendar and reporting periods end on the last day of March, June, September and December of each year. This means that MMFs subject to yearly reporting obligations will report once a year as of the last day of December.**

MMFs subject to quarterly reporting obligations will report on a quarterly basis as of the last day of March, June, September and December.

10. If the last day of a reporting period in a jurisdiction of a reporting MMF is a bank holiday and no data is available for that date, the MMF should use information from the immediately last previous day when the information is available, but the reporting date should remain the last day of the reporting period according to the TARGET calendar. In all these cases, managers of MMF could send the report to the competent authority of the MMF until 30 days after the end of the corresponding quarter (year).

### **5.1.2 Procedure for first reporting**

11. **There may be cases in which managers of MMFs do not have any information to report on MMFs. In such a scenario, managers of MMFs should still provide a report to their NCAs by indicating that no information is available by using a specific field.**
12. **The date when the managers of MMFs should start reporting should be the first authorization date of the MMF (exact date).**
13. Managers of MMFs should report information to their national competent authorities only once per reporting period covering all the reporting period. For example, managers of MMFs subject to yearly reporting obligations should only provide one report to their NCAs for each year period (yearly period that always end on 31 December of that specific year). Managers of MMFs subject to quarterly reporting obligations should only provide one report to their NCAs for each quarterly period.

### **5.1.3 Procedures when managers of MMFs are subject to new reporting frequency or changes to their reporting**

14. **With respect to the thresholds referred to in Article 37(1) of the MMF Regulation, the total value of assets under management is considered for the purpose of the reporting template to equal the NAV, as per field A.4. Furthermore, ESMA is of the view that the NAV should be measured when the corresponding data is made available on a quarterly basis (last day of the quarter).**

15. **In the context of the MMF Regulation, changes of frequency are possible for:**

**Case 1 - From MMF with yearly reporting to quarterly reporting**

**Case 2 - From MMF with quarterly reporting to yearly reporting**

16. **Case 1 - From MMF with yearly reporting obligation to MMF with quarterly reporting obligations**

- 1) If the total AuM > 100 mio € during Q1: the following reports have to be submitted to the competent Authority: Q1, Q2, Q3, Q4
- 2) If the total AuM > 100 mio € during Q2: the following reports have to be submitted to the competent Authority: H1 (covering the first 6 months of the year), Q3, Q4
- 3) If the total AuM > 100 mio € during Q3: the following reports have to be submitted to the competent Authority: X1 (covering the first 9 months of the year), Q4
- 4) If the total AuM > 100 mio € during Q4: the following reports have to be submitted to the competent Authority: Y1 (covering the first 12 months of the year), then quarterly reporting during the next year

In addition, it is considered that the break of a threshold at the end of a quarter should trigger the submission of the reporting on the quarter itself and not stating from the next quarter.

#### 17. Case 2 - From MMF with quarterly reporting obligation to MMF with yearly reporting obligations

In this case, the following process should be followed:

In the following situations when the total AuM is below threshold (< 100 mio €) at the last business day of a quarter the AuM:

If this happens in Q1 => the following reports have to be submitted to the competent Authority: only Y

If this happens Q2 => the following reports have to be submitted to the competent Authority: Q1, X2 (covering the last 9 months of the year)

If this happens Q3 => the following reports have to be submitted to the competent Authority: Q1, Q2, H2 (covering the 6 months of the second half of the year)

If this happens Q4 => the following reports have to be submitted to the competent Authority: Q1, Q2, Q3, Q4 (no change until YYYY+1).

#### 5.1.4 ECB exchange rate (referred to in fields A.4.1, A.6.12, A.6.16, A.6.30, A.6.34, A.6.52, A.6.54, A.6.56, A.6.67, A.6.70, A.6.80, A.6.91, A.6.93, A.6.97, B.1.11, B.1.13)

18. Fields A.4.1, A.6.12, A.6.16, A.6.30, A.6.34, A.6.52, A.6.54, A.6.56, A.6.67, A.6.70, A.6.80, A.6.91, A.6.93, A.6.97, B.1.11, and B.1.13 of the ITS specify that if the base currency is not EUR the exchange ratio used shall be the ECB one.

19. Euro foreign exchange reference rates are quoted by the ECB as base currency against euro (e.g. expressed as 1 EUR = 129.04 JPY as of 29 June 2018). Thus, the value in the fields in base currency should be divided by this rate. For example, if, as of end of Q2 2018 (last business day 29 June 2018), the NAV of the fund is expressed

in JPY and worth 150 billion of Japanese yen (value reported in field A.4.2), the value to report in field A.4.1 would be  $150 \text{ billion} / 129.04 = 1.162 \text{ billion of EUR}$  (rounded here at  $10^{-3}$ ).

### **5.1. 5 Optional vs mandatory fields**

20. Information marked as mandatory should be reported by all managers of MMFs. Information marked as optional should be reported by the manager of the MMF except if this regulatory information does not apply to this specific MMF at this specific point of time. Information marked as conditional is linked to other information (flags) in the reporting template. If those flags are answered with “Yes”, the corresponding conditional information has to be reported. However, if those flags are answered with “No”, the corresponding conditional information should not be reported.

### **5.1. 6 Comment on a reported element**

21. In the context of the MMF database is defined a drop down list of the fields for which the manager of the MMF is allowed to provide any useful comment. This list will be included in IT template to be filled in by managers.

### **5.1. 7 Meaning of the format “%” (fields A.4.5, A.4.6, A.4.7, A.4.8, A.4.9, A.4.10, A.7.1, A.7.2, A.7.3, A.7.4, A.7.7), and use of the figure “0” in filling the reporting template**

22. With respect to the different fields (fields A.4.7, A.7.2, A.7.3, A.7.4) where percentages need to be reported that sum up to 100%, managers should ensure that the sum of the reported percentages (where relevant) equals 100%. Percentages should be reported as numbers between 0 and 100. For example 53% should be reported as 53 (and not 0.53). This is also true for field A.4.7 which does not include the term “%” in the column “reported data” of the ITS.
23. Competent authorities should reject any report where the sum of reported percentages (where relevant) does not equal 100%
24. In addition, when a manager of a MMF uses the figure “0” to fill in one of the fields of the MMF reporting template, this should only mean the value of the figure (0) and nothing else (such as “non-submission”, “not relevant”, or “does not apply” or “no information is available”).

## 5.2 Blocks (collection of fields)

25. This section includes specifications in relation to each block of fields of the reporting template and addresses the relevant fields in relation to a particular topic, with accompanying guidance on how to populate them. The blocks are structured to be independent of each other.

### Block 1 – MMF characteristics

#### 5.2.1 Identification (field A.1.2)

26. If the national code of the MMF as referred to in field A.1.2 changes, managers of MMFs should indicate the former national code together with the current national code in the first report following the change of the national code and each subsequent report.

#### 5.2.2 Member State where the MMF is authorised (field A.1.9) and Member States where the MMF is marketed (field A.1.10)

27. Field A.1.9 relates to a singular form (“Member State”) whereas field A.1.10 relates to a plural form (“Member States”). The singular form reflects the case of an EU MMF but not the case of a non-EU MMF for which the same MMF may have several competent authorities (for example, a non-EU AIF MMF marketed in the EU in several Member States without a passport, cf. article 2(17)(c)(i) of the MMF Regulation). The Member State to be reported in that case under field A.1.9 is the Member State of the competent authority to which the report is submitted. .

28. With respect to the Member State where the MMF is authorised (field. A.1.9), in the specific case of a non-EU MMF for which there could be several such competent authorities, all these several Member States should be reported under field A.1.9. It is to be noted that the same information on a specific MMF reported to different national competent authorities should be the same.

29. Furthermore, in the case of a non-EU MMF, pursuant to the definition of competent authority in Article 2(17) of the MMF Regulation, field A.1.10 should only list cases where the non-EU MMF is marketed in the Union.

#### 5.2.3 Inception date (field A.1.11)

30. The inception date of an MMF as referred to in field A.1.11 is the date when the first NAV of the MMF is calculated. If the MMF was a pre-existing fund which has been granted the MMF Authorisation under the MMF Regulation, this inception date should be the date when the first NAV of this fund as a *MMF* (under the MMF Regulation) is calculated.



#### **5.2.4 Base currency of the MMF (field A.1.12)**

31. **First, With respect to the base currency of the MMF (field A.1.12), the base currency of the MMF reported in field A.1.12 should be the same as indicated in the prospectus of the MMF. If an MMF is composed of different share classes that differ in relation to their base currency the base currency that should be included in field A.1.12 is the base currency as specified in the reference accounting documents of the MMF.**
32. In addition, with respect to the base currency of the MMF (field A.1.12), for the particular case of currencies with several codes (e.g. onshore/offshore currencies such as Chinese renminbi with CNY/CNH), it should be noted that the instruments are to be reported with a single currency code (onshore one, here CNY - codes in the official ISO list) and to be converted into EUR at the applicable rate (e.g. instruments denominated in CNH to be reported with the CNY currency code and converted into EUR at the applicable EUR/CNY rate).
33. Finally, if the base currency of the MMF is Euro, the fields A.4.2, A.6.13, A.6.15, A.6.17, A.6.31, A.6.33, A.6.35, A.6.53, A.6.55, A.6.57, A.6.68, A.6.71, A.6.81, A.6.92, A.6.94, A.6.98, B.1.12, and B.1.14 should not be filled in.

#### **5.2.5 Feeder MMFs for MMF marketed solely through employee savings scheme (fields A.3.1 to A.3.4)**

34. **Managers of MMF should treat feeder MMFs of the same master fund individually. They should not aggregate all the information on feeder MMFs of the same master(s) in a single report. Managers of MMFs should not aggregate master-feeder structures in a single report (i.e. one report gathering all the information on feeder MMFs and their master MMF(s)).**
35. **When reporting information on feeder MMFs, Managers of MMFs should identify the master MMF in which each feeder invests but should not look through the master MMF(s) to its(their) holdings. If applicable, Managers of MMFs should also report detailed information on investments that are made at feeder MMF level, such as investments in financial derivative instruments.**
36. In addition, in relation to field A.3.1 - If the MMF complies with the requirements of Article 16(5) of the MMF Regulation, indicate whether the MMF is a master or a feeder fund [Select one] – a NONE value should be added when the fund is not a feeder or a master. This will be added in the reporting template managers of MMF will have to fill in.

#### **5.2.6 Share classes (fields A.3.5 to A.3.7)**

37. **With respect to MMF with different share classes denominated in different currencies (field A.3.7), the manager of the MMF should report all different currencies**

of the different share classes, indicating which currency is related to which share class.

38. In addition, with respect to the ISIN of the different share classes (field A.3.6), given the interaction with field A.7.5, managers of MMF should identify which share or unit class of the MMF is the largest within the list mentioned under field A.3.6.

#### **5.2.7 Merge of an MMF (field A.3.8)**

39. Managers of MMFs should provide the last report of the MMF to their NCA not later than 30 days after the end of the quarter in which the MMF has been merged.

#### **5.2.8 Liquidation of an MMF (field A.3.9)**

40. Liquidation processes may vary according to the type of MMFs managed and the jurisdiction of the MMF. Depending on the situations, the last report might not contain any information (where all the positions of the MMF have been unwound), or else the report might be complete. Indeed, in some cases, an MMF that enters into a liquidation procedure (administrative procedure) is no longer managed by the manager and the liquidation is instead carried out by a liquidator. In that case, the manager of the MMF should provide a report to the NCAs of the MMF for the MMF before the liquidator takes over the responsibility for the liquidation of the MMF.
41. Managers of MMFs should submit the last MMF report not later than 30 days after the end of the quarter in which the MMF has been liquidated or put into liquidation.

#### **5.2.9 Change of the manager of an MMF**

42. When the manager of an MMF changes between two reporting dates, the former manager of the MMF should not report any information at the end of the reporting period. Rather, the information should be reported by the new manager of the MMF at the end of the reporting period covering the whole period based on information provided by the former manager of the MMF.

#### **5.2.10 Withdrawal of the authorization of an MMF**

43. Managers of MMFs should submit the last MMF report not later than 30 days after the end of the quarter in which the MMF has been withdrawn its authorization.

#### **5.2.11 Granting of the authorisation of an MMF due to a change of strategy of an existing non-MMF fund**

44. When the manager of a fund is granted the authorization of an MMF under the MMF Regulation for the purpose of that specific fund, due to a change of its strategy, the information should be reported starting from the date the fund get its MMF

authorisation by the manager of this new MMF at the end of the reporting period covering that whole period.

#### **5.2.12 Umbrella MMFs**

45. If an MMF takes the form of an umbrella AIF with several compartments or sub-funds, MMF-specific information should be reported at the level of the compartments or sub-funds.
46. The reporting frequency of an MMF is not affected by the legal structure of the MMF. Each MMF, being sub-funds of the same umbrella MMFs or not, has to be treated separately for the purpose of the reporting obligations (including for the reporting frequency).

## **Block 2 – Portfolio indicators**

### **5.2.13 Portfolio liquidity profile (field A.4.7)**

47. **Managers of MMFs should report the percentage of the fund’s portfolio that is capable of being liquidated within each of the liquidity periods specified. Each asset should be assigned to one period only and such assignment should be based on the shortest period during which such a position could reasonably be liquidated at or near its carrying value. The total should equal 100%.**
48. **If individual positions are important contingent parts of the same trade, managers of MMFs should group all of these positions under the liquidity period of the least liquid part.**
49. Managers of MMFs should adopt a conservative approach when they report information on the portfolio liquidity. As a consequence, managers of MMFs should take into account the time delay for having the proceeds of the sale available on a cash account if it has as a non-negligible impact on the liquidity profile of the MMF.

### **5.2.14 Cumulative returns (field A.4.8)**

50. **With respect to field A.4.8 of the ITS, the figure of cumulative returns to be reported should be net returns. The manager of an MMF shall report the cumulative returns of the most representative share class, as defined under field A.6.9.**

### **5.2.15 Performance of the most representative share class (field A.4.9)**

51. According to the field A.4.9 of the ITS, the manager of an MMF shall report the calendar year performance of the most representative share class.
52. **With respect to field A.4.9 of the ITS on the calendar year performance of the most representative share class, the most representative share class should be understood as the share class associated with the highest NAV proportion or so at the end of the reporting period. In addition, no data should be reported when the inception date of the MMF was less than 12 months before the reporting end date.**

### **5.2.16 Monthly portfolio volatility and Monthly portfolio volatility of the shadow NAV (when applicable) (field A.4.10)**

53. With respect to monthly portfolio volatility and monthly portfolio volatility of the shadow NAV (when applicable) (field A.4.10), a number of elements could be specified, in order to complement the requirements included in the ITS and the article 37 of the MMF Regulation.
54. **First with respect to monthly portfolio volatility and monthly portfolio volatility of the shadow NAV (when applicable) (field A.4.10), which should be understood as the**

**“NAV per unit or share in accordance with Article 30” as referred to in articles 31(4) and 32(4) of the MMF Regulation, the reporting of the monthly portfolio volatility of the shadow NAV is not relevant for VNAV MMFs.**

55. **In addition, with respect to monthly portfolio volatility and monthly portfolio volatility of the shadow NAV, the following specifications should also be applied, taking into account the mean value of the returns.**

The following formula of the monthly volatility should be used:

$$\sigma_f = \sqrt{\frac{m}{T-1} \sum_{t=1}^T (r_t - \bar{r})^2}$$

where the return of the fund ( $r_t$ ) is calculated over  $T$  periods with a duration of  $1 / m$  years, for a period of three years.

$m = 12$  and  $T = 36$  for the calculation of the monthly return

and where  $\bar{r}$  is the arithmetic mean of the monthly return rates, as applicable, of the fund over  $T$  periods (not considering subscription and redemption fees) according to the following formula:

$$\bar{r} = \frac{1}{T} \sum_{t=1}^T r_t$$

## Block 3 – Stress tests

### 5.2.17 Results of stress tests (fields A.5.1 to A.5.10)

56. Apart from field A.5.10 on the proposed action plan in relation to stress tests, where free text is allowed, the rest of the information to be reported will consist of figures, predetermined values or names. For field A.5.10, ESMA recommends that the national competent authority allow managers of MMFs to report the information in English, which would allow multinational groups to centralise and harmonise their MMF reporting.
57. **In addition, with respect to fields A.5.1 to A.5.10, managers of MMFs should fill in these fields quarterly (even within the quarters when no stress tests have been carried) and indicate the date when the stress tests the results of which they report was carried. One of these dates should be the last day of the year. In the case of MMFs subject to yearly reporting, when several stress tests were performed during the yearly reporting period, only the last one should be reported.**
58. The format of the results of the stress tests to be reported in fields A.5.1 to A.5.10 will be specified when there is more clarity on the common risk parameters related to these stress tests, which are to be specified by ESMA in the context of the Guidelines on MMF stress tests.

## **Block 4 – Information on the assets**

**5.2.18 Asset description of the money market instrument (field A.6.2), eligible securitisation or ABCP (field A.6.21), unit or share of other MMF (field A.6.61), deposit or ancillary asset (field A.6.72) and repurchase agreement or reverse repurchase agreement (field A.6.82)**

59. Field A.6.2 should be filled in only if there does not exist ISIN (field A.6.3) nor CFI code (field A.6.4) of the money market instrument. Field A.6.21 should be filled in only if there does not exist ISIN (field A.6.22) of the securitisation or asset backed commercial paper. Field A.6.61 should be filled in only if there does not exist ISIN (field A.6.62) nor LEI (field. A.6.63) nor CFI code (field A.6.64) of the unit or share of other MMF. Field A.6.72 should be filled in only if there does not exist ISIN (field A.6.73) nor CFI code (field A.6.74) of the deposit or ancillary asset. Field A.6.82 should be filled in only if there does not exist ISIN (field A.6.83) nor CFI code (field A.6.84) of the repurchase agreement or reverse repurchase agreement.

**5.2.19 CFI (if available, and if the ISIN is not available) of the money market instrument (field A.6.4), financial derivative instrument (field A.6.43), unit or share of other MMF (field A.6.64), deposit or ancillary liquid asset (field A.6.74), repurchase agreement or reverse repurchase agreement (field A.6.84), and asset referred to in field B.1.3**

60. With respect to the CFI code to be provided for the different assets (field A.6.4, A.6.43, A.6.64, A.6.84, B.1.3), in combination with an ISIN, the CFI should be provided, as both are assigned concurrently by the national numbering agencies. If the instrument does not possess an ISIN, a CFI code should also be reported, as per the ISO 10962 standard. In this case, at least the first 2 characters of the CFI code and the character representing asset class (if applicable for a given instrument) shall be provided (ie. these characters cannot be "X", which represents not applicable or undefined value). To guide the reporting entities in the generation of a CFI, ESMA has compiled a mapping of the CFI code, englobing all eligible asset (Annex)With respect to the CFI code for deposit or liquid ancillary assets (field A.6.74), no CFI code shall be provided.

**5.2.20 Asset country (fields A.6.8, A.6.23, A.6.50, A.6.66, A.6.75, A.6.85)**

61. When reporting information on the geographical focus of the different types of assets, the information should be reported as of the last day of the reporting period (if the information is not available on that last day, managers of MMFs should use the

last information available on this topic). Assets that do not have a predominant geographical focus should be included in the category “supranational/multiple regions.

62. For eligible securitisation and asset backed commercial paper (field A.6.23), if there is no sponsor, the country of the originator should be indicated.
63. As per field A.6.8, the country of a money market instrument is the country of the issuer of the money market instrument.
64. In alignment with the above, for financial derivative instruments (OTC and listed derivatives), the country of the financial derivative instrument (field A.6.50) shall be the country of the counterparty of the financial derivative instrument.
65. For deposit or ancillary liquid asset, the country (field A.6.75) should be based on the domicile of the entity in which the deposit is deposited. For instance, the domicile of a cash deposit in Euro in a US bank should be the US.
66. For repurchase agreement or reverse repurchase agreement, the domicile should be the domicile of the counterparty to the repurchase agreement or reverse repurchase agreement.

#### **5.2.21 Clean price of the money market instrument (A.6.12 and A.6.13), eligible securitisation or asset backed commercial paper (A.6.30 and A.6.31)**

67. With respect to the clean price of the money market instrument (A.6.12 and A.6.13), eligible securitisation or asset backed commercial paper (A.6.30 and A.6.31) these fields should always be reported in absolute terms (in monetary values, not in percentages). Accrued interests (A.6.14, A. 6.15, A.6.32, A.6.33) and Total market values (A.6.16, A.6.17, A.6.34, A.6.35) should also always be reported in absolute terms (in monetary values, not in percentages).

#### **5.2.22 Accrued interests (A.6.14 and A.6.15), Total market value of the money market instrument (A.6.16 and A.6.17), and the method used to price the money market instrument (A.6.18)**

68. With respect to fields A.6.14 to A.6.18, if the manager indicates that the method used to price the money market instrument (A.6.18) is “mark-to-model”, or “amortised cost”, it should not fill in the fields related to Clean price (A.6.12 and A.6.13) and Accrued interests (A.6.14 and A.6.15), and the total market value of the money market instrument (A.6.16 and A.6.17) should be understood in that case as the Total value of the money market instrument. If the manager indicates that the method used to price the money market instrument (A.6.18) is “mark to market”, the sum of the fields A.6.13 (clean price) and A.6.15 (accrued interests) should equal the field A.6.17 (total market value).



### **5.2.23 Asset description of the eligible securitisation or asset backed commercial paper (Field A.6.21)**

69. With respect to the asset description of the eligible securitisation or asset backed commercial paper (Field A.6.21), managers should report the securitisation identifier using the format "Securitisation Repository LEI", then a hyphen, and a unique identifier for the securitisation generated and assigned by the securitisation repository. This is a mandatory identifier for assets classified as "STS" as mentioned in Regulation 2017/1131.

### **5.2.24 Contract type of derivative contract (Field A.6.39)**

70. In order to fill in this field, with respect to the contract type of derivative contract (Field A.6.39), managers should use the following typology of contract types:

- 'CFDS' for Contracts for difference
- 'FORW' for forwards
- 'FRAS' for Forward Rate Agreements
- 'FWOS' Forwards on a swap
- 'FUTR' for futures
- 'FONS' for Futures on a swap
- 'OPTN' for options
- 'OTHR' for other
- 'SWAP' for swaps
- 'SWPT' for swaption

### **5.2.25 Name of the underlying (Field A.6.45)**

71. With respect to the name of the underlying (Field A.6.45), a number of elements could be specified, in order to complement the requirements included in the ITS and the article 37 of the MMF Regulation.

### **5.2.26 Exposure of the repurchase agreement or a reverse repurchase agreement (Field A.6.91 and A.6.92)**

72. **With respect to exposure of the repurchase agreement or a reverse repurchase agreement (Field A.6.91 and A.6.92), the exposure referred to in these fields is gross exposure.**
73. **With respect to repurchase agreement, the gross exposure should be understood as the market value of the securities sold to the counterparties of the repo transactions (in exchange of the cash received) should be reported, without taking into account any netting effects and without considering the collateral received in order to mitigate the counterparty risk arising from these transactions.**
74. **With respect to reverse repurchase agreement, the gross exposure should be understood as the value of the cash paid to the counterparties of reverse repo transactions (in exchange of securities bought) should be reported, without taking into account any netting effects and without considering the collateral received in order to mitigate the counterparty risk arising from these transactions.**

## Block 5 – Information on the liabilities

### 5.2.27 Investor concentration (field A.7.2)

75. **With respect to investor concentration (field A.7.2), for MMFs with several unit or share classes, managers of MMFs should consider the percentage of these units or shares in relation to the NAV of the MMF in order to be able to aggregate the percentages of professional investors and retail investors in the MMF. The total should equal 100%. The totals in fields A.7.3 and A.7.4 should also equal 100%.**
76. **With respect to field A.7.2, the manager of an MMF should also specify the percentage of the NAV on both i) professional clients and ii) retail investors, which is an estimate. There would therefore be four fields to be filled in: i) % of NAV of professional clients, which is not an estimate ii) % of NAV of professional clients, which is an estimate iii) % of NAV of retail clients, which is not an estimate iv) % of NAV of retail clients, which is an estimate.**
77. Two corresponding additional subfields will be included in the field of the reporting template to be filled in by manager of MMFs corresponding to the field A.7.2 of the ITS.
78. **In particular, further specification on which issuer group taxonomy as provided by the European Central Bank is corresponding to the issuer category as referred to in field A.6.86 is provided below:**
- Issuer categories “Sovereign (EU)” together with “Sovereign (non-EU)” are corresponding to “Central government” under IG2 code;
  - Issuer categories “EU Central Bank” together with “non-EU central bank” are corresponding to “Central bank” under IG1 code;
  - Issuer categories “National Public Body” together with “EU Public Body (excluding National Public Body)” and “Non-EU public body” are corresponding to “Public Corporation” under IG11 code;
  - Issuer categories “Supranational Public Body (EU)” together with “Supranational Public Body (other than EU)” are corresponding to “Supranational issuer” under IG6 code;
  - Issuer category “Credit Institution” is corresponding to “Credit institution (excluding agencies)”, “Agency - non credit institutions” and “Agency - credit institution” under IG4, IG7 and IG8 codes;
  - Issuer category “Other financial corporations” is corresponding to “Financial corporations other than credit institutions” under IG9 code; and
  - Issuer category “Non-financial corporations” is corresponding to “Corporate and other issuers” under IG3 code.

- Issuer categories “EU Central Bank” together with “non-EU central bank” is corresponding to “Central bank” under IG1 code.

### **5.2.28 Investor group breakdown (field A.7.3)**

**79. First, Beneficial owners’ as referred to in fields A.7.1 and A.7.3 should be considered at the level of the legal entity and not at the level of the parents company.**

**80. In addition, The following list indicates which institutional sector of the economy in accordance with the European System of accounts (ESA) 2010 manual is corresponding to the investor group as referred to in field A.7.3:**

- Investor group “Non-financial corporations” is corresponding to “Non-financial corporations” under S11 code
- Investor group “Banks” is corresponding to “monetary financial institutions (MFIs)” under S12K code
- Investor group “Insurance corporations” is corresponding to “Insurance corporations” under S128 code
- Investor group “Other financial institutions” is corresponding to “Other financial institutions” under S12O
- Investor group “Pension plans / funds” is corresponding to “Pension funds” under S129 code
- Investor group “General government” is corresponding to “General government” under S13 code
- Investor group “Other collective investment undertakings” is corresponding to “Non-MMF investment funds” under S124 code
- Investor group “Households” is corresponding to “households and non-profit institutions serving households” under S14 and S15 codes
- Investor group “Unknown” is corresponding to “Unspecified” under S1N code
- The “Rest of the world” under S2 code may not be linked directly to the investor group list as referred to in field A.7.3.

### **5.2.29 Notice period required by investors (Field A.7.6)**

**81. With respect to field A.7.6 of the ITS, if there are multiple classes of shares or units, the notice period reported should be the one of the largest share class (associated with the highest NAV proportion or so). In addition, bank working days should be taken into account when filling in the field A.7.6 in “days”.**

### **5.2.30 Liquidity arrangements (Field A.7.7)**

82. In field A.7.7, the manager of an MMF is to indicate if there are some “Other arrangements for managing illiquid assets” in relation to this MMF. If there are no such other arrangements, the manager of an MMF should include “0” in the field “% of NAV” related to that specific field.

### **5.2.31 Information on the liabilities of the MMF: subscriptions (A.7.9), redemptions (A.7.10), payments to investors (A.7.11), exchange rate (A.7.12)**

83. With respect to subscriptions, the date of subscription to be taken into account when filling in the MMF reporting template (field A.7.9) should be the date when the share of the MMF is issued, and not the day when the corresponding amount of the share is actually paid to the MMF”

84. With respect to redemptions, the date of redemption to be taken into account when filling in the MMF reporting template (field A7.10) should be the date when the share of the MMF is redeemed, and not the day when the corresponding amount of the share is actually received from the MMF.

85. With respect to payments to investors, payments to investors as referred to in field A.7.11 include dividends.

86. With respect to the exchange rate referred to in field A.7.12, this reported exchange rate should be the exchange rate at the end of the month corresponding to the reporting of fields A.7.8, A.7.9 and A.7.11 or, if not available at that date, the last preceding available exchange rate. This same exchange rate should be used when filling in EUR all fields A.7.8, A.7.9 and A.7.11.

## **Block 6 – Information on LVNAV**

**5.2.32 Information on the price referred to fields B.1.4, B.1.5 (price when the event occurs, using the amortised cost method with respect to B.1.5), B.1.8 (minimum price deviation between two values referred to in field B.1.8) and the average difference between two values referred to in field B.1.7**

- 87. With respect to the price referred to fields B.1.4 and B.1.5 (price when the event occurs, using the amortised cost method with respect to B.1.5), the currency in which this price is expressed should be EUR.**
- 88. With respect to the difference referred to in fields B.1.7 and B.1.8., the figures should be expressed in basis points.**

## 5 Annex

### CFI codes for eligible securities

<b>Instrument category</b>	<b>Group</b>	<b>Mandatory letters of the CFI code to be provided</b>
<b>Collective investment vehicles</b>	<b>E Exchange traded funds (ETF)</b>	<b>CE****</b>
<b>Collective investment vehicles</b>	<b>F Funds of funds</b>	<b>CF****</b>
<b>Collective investment vehicles</b>	<b>I Standard (vanilla) investment funds/mutual funds</b>	<b>CI****</b>
<b>Collective investment vehicles</b>	<b>S Pension funds</b>	<b>CS****</b>
<b>Debt instruments</b>	<b>Asset-backed securities</b>	<b>DA****</b>
<b>Debt instruments</b>	<b>Bonds</b>	<b>DB****</b>
<b>Debt instruments</b>	<b>Convertible bonds</b>	<b>DC****</b>
<b>Debt instruments</b>	<b>Depository receipts on debt instruments</b>	<b>DD****</b>
<b>Debt instruments</b>	<b>Structured instruments (without capital protection)</b>	<b>DE****</b>
<b>Debt instruments</b>	<b>Mortgage-backed securities</b>	<b>DG****</b>
<b>Debt instruments</b>	<b>Municipal bonds</b>	<b>DN****</b>

<b>Debt instruments</b>	<b>Structured instruments (capital protection)</b>	<b>DS****</b>
<b>Debt instruments</b>	<b>Medium-term notes</b>	<b>DT****</b>
<b>Debt instruments</b>	<b>Bonds with warrants attached</b>	<b>DW****</b>
<b>Debt instruments</b>	<b>Money market instruments</b>	<b>DY****</b>
<b>Futures</b>	<b>Baskets</b>	<b>FFB***</b>
<b>Futures</b>	<b>Currencies</b>	<b>FFC***</b>
<b>Futures</b>	<b>Debt</b>	<b>FFD***</b>
<b>Futures</b>	<b>Futures</b>	<b>FFF***</b>
<b>Futures</b>	<b>Indices</b>	<b>FFI***</b>
<b>Futures</b>	<b>Interest Rates</b>	<b>FFN***</b>
<b>Futures</b>	<b>Options</b>	<b>FFO***</b>
<b>Futures</b>	<b>Swaps</b>	<b>FFW***</b>
<b>Non-listed and complex listed options</b>	<b>Foreign exchange</b>	<b>HF****</b>
<b>Non-listed and complex listed options</b>	<b>Rates</b>	<b>HR****</b>
<b>Forwards</b>	<b>F Foreign Exchange</b>	<b>JF****</b>
<b>Forwards</b>	<b>R Rates</b>	<b>JR****</b>
<b>Listed options</b>	<b>Baskets (call)</b>	<b>OC*B**</b>
<b>Listed options</b>	<b>Baskets (put)</b>	<b>OP*B**</b>
<b>Listed options</b>	<b>Baskets (other)</b>	<b>OM*B**</b>
<b>Listed options</b>	<b>Currencies (call)</b>	<b>OC*C**</b>
<b>Listed options</b>	<b>Currencies (put)</b>	<b>OP*C**</b>
<b>Listed options</b>	<b>Currencies (other)</b>	<b>OM*C**</b>
<b>Listed options</b>	<b>Debt (call)</b>	<b>OC*D**</b>
<b>Listed options</b>	<b>Debt (put)</b>	<b>OP*D**</b>



<b>Listed options</b>	<b>Debt (other)</b>	<b>OM*D**</b>
<b>Listed options</b>	<b>Futures (call)</b>	<b>OC*F**</b>
<b>Listed options</b>	<b>Futures (put)</b>	<b>OP*F**</b>
<b>Listed options</b>	<b>Futures (other)</b>	<b>OM*F**</b>
<b>Listed options</b>	<b>Indices (call)</b>	<b>OC*I**</b>
<b>Listed options</b>	<b>Indices (put)</b>	<b>OP*I**</b>
<b>Listed options</b>	<b>Indices (other)</b>	<b>OM*I**</b>
<b>Listed options</b>	<b>Interest Rates (call)</b>	<b>OC*N**</b>
<b>Listed options</b>	<b>Interest Rates (put)</b>	<b>OP*N**</b>
<b>Listed options</b>	<b>Interest Rates (other)</b>	<b>OM*N**</b>
<b>Listed options</b>	<b>Options (call)</b>	<b>OC*O**</b>
<b>Listed options</b>	<b>Options (put)</b>	<b>OP*O**</b>
<b>Listed options</b>	<b>Options (other)</b>	<b>OM*O**</b>
<b>Listed options</b>	<b>Swaps (call)</b>	<b>OC*W**</b>
<b>Listed options</b>	<b>Swaps (put)</b>	<b>OP*W**</b>
<b>Listed options</b>	<b>Swaps (other)</b>	<b>OM*W**</b>
<b>Swaps</b>	<b>Foreign exchange</b>	<b>SF****</b>
<b>Swaps</b>	<b>Rates</b>	<b>SR****</b>
<b>Financing transaction</b>	<b>Repos</b>	<b>LR****</b>