Commodity Position Reports Interface Specification v2.1

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Change History

Revision	Date	Section	Section Name	Change
1.0	04 Aug 2017			Original version
1.1	18 Oct 2017	1.1	Introduction – Positions	General update
1.1	18 Oct 2017	2.1	Position Report - ITS4 Schema	Inserted FIA schema and included LME narrative. Note that the FIA optional records fields are all mandatory for the LME.
1.1	18 Oct 2017	2.2	Position Report – ITS4 XML Example	Updated to include extended ITS4 schema
1.1	18 Oct 2017	5	Frequency	Amended submission deadline to align with other FIA venues
2.0	23 Sep 2025	All		Document rewritten for PS25/1 changes going live 6th July 2026.
2.1	14 Nov 2025	3.1	Mandatory data validations	Updated validation table to confirm PQ/DPQ validations only apply to non-options contract. Updated requested time for resubmissions from 4.30pm to 3.30pm.
2.1	14 Nov 2025	5.1	CPR Processing flow	Updated requested time for resubmissions from 4.30pm to 3.30pm.
2.1	14 Nov 2025	6.2	Report body	Updated regulation references to refer to MAR 10.2 where appropriate.
2.1	14 Nov 2025	6.3	Table showing suggested population for fields 29, 31, 32.	Added table.
2.1	14 Nov 2025	6.4	CPR Submissions XML Examples	Changed name of section and amended population of fields to make these more LME specific and appropriate.

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1 Introduction

On 3 January 2018 the European Securities and Market Authority (ESMA) requirements under MiFIR and MiFID II took effect in the UK, introducing additional reporting requirements for positions in commodity derivatives. In preparation for this, during 2017, the LME published various notices and guidance to Members informing them of the upcoming MiFID II Commodity Position Reporting (CPR) obligations for Members and the LME.

The LME are obliged to report details of all positions held in commodity derivatives to the FCA each business day, as per MAR 10.4. Positions held by Members, clients and their underlying clients through to the end client must be reported.

The LME requires position reports to be submitted by Members via SFTP to the UDG in the extended FIA ITS4 format. The LME will provide the requested FCA ITS4 formatted reports to the FCA. The extended FIA format allows the LME to capture extra information from Members to create the weekly Commitment of Trader Report.

ITS4 allows for the population of personal data within the Position Holder (NATIONAL_ID) and associated email address fields. The LME will follow this industry standard and pass the data directly to the FCA. No short-codes are required for position reporting.

2 PS25/1 & Commodity Position Reform

In December 2023, the FCA published their CP23/27 consultation paper, which was followed up in February 2025 by the PS25/1 policy statement.

PS25/1 confirmed that responsibility for setting commodity position limits will be transferred from the FCA to trading venues, with a focus on 14 critical contracts. Position limits will be established on futures and options based on these contracts and these limits will apply to positions in “spot” months and “other” months. Trading venues are required to set position limits and accountability thresholds and to establish processes for receiving and processing applications from their members for the granting of exemptions to those limits. They are also expected to notify the competent authority (the FCA) if limits or exemption ceilings are breached and to notify the FCA when exemptions have been granted.

Further information is available here:
PS25/1: Reforming the commodity derivatives regulatory framework

PS25/1 also stipulated changes to the reporting schema for Commodity Position Reporting, as detailed in the revised MAR 10.4 section of the FCA Handbook and MAR 10 Annex 4 R Format for the Daily Reports:

FCA Handbook - MAR 10 Commodity derivative position limits and controls, and position reporting
FCA Handbook - MAR 10 Annex 4 R Format for the daily reports

These changes have led to the revision of the LME’s CPR schema. The new schema goes live on **Monday 6th July 2026.** The LME will make a Member test environment available from April 2026.

3 Data Quality

3.1 Mandatory data validations

As a result of the changes arising from PS25/1, the LME is taking a renewed focus on data quality in CPR reports submitted by Members. The LME needs to report to the FCA with accurate data for both regulatory reporting purposes, but also to ensure that the CPR data it receives from Members is of the standard required to help inform its strategy and decision making concerning the setting of position limits, accountability thresholds and the granting of exemptions from those limits.

Data quality analysis of CPR submissions is conducted by the RRT on an ongoing basis. Members may be contacted and requested to make improvements if issues are identified.

The LME has therefore decided to add the following mandatory data quality validations to its CPR system from Q2 2026. Please note the following terms have been abbreviated as follows:

“PQ” = Position Quantity. “DPQ” = Delta Position Quantity. “VPC” = Venue Product Code.

Name of Validation	Rule	Notes/Example
PQ 0, DPQ Not 0	If PQ populated is 0 and DPQ is not 0 for a non-options contract, reject record.	PQ will be populated as 0 where a record is submitted for a flattened position. If the position does not trade on the following business day, then this position will not be reported until the position trades again or the instrument hits prompt/expiry.
DPQ not valid	If DPQ reported greater than PQ or less than the negative value of PQ for a non-options contract, reject record.	DPQ should be positive for long call or short put positions and negative for short call or long put positions. If position quantity is 5 or -5, then the record will be rejected if the DPQ is greater than 5 or less than -5.
VPC incorrect	If VPC submitted on CPR does not match first two characters of Contract Code (as per the TIF), reject record.	For example, a VPC submitted as “PB” for a position on GB00KNQF7N28 (for which the contract code is “AHD”) would see the record rejected.
Position Type incorrect	If a position on a non-options contract has a Position Type of “OPTN” reported, reject record. If a position on an options contract has a Position Type of “FUTR” or “OTHR” reported, reject record.	For example, a Position Type submitted as “FUTR” for a position on GB00KNQ8KX23 (which is an option instrument) would see the record rejected.

If records are submitted that fail the above validation checks, we will contact the Member to advise them that they need to resubmit the affected records as soon as possible and no later than 3.30pm that day.

3.2 Delta Position Quantity

Delta Position Quantity (DPQ) should be populated as Position Quantity * Option Delta. The DPQ should be rounded to 2 decimal places.

The Option Delta should be sourced from the value present in the most recent EOD Tradable Instruments File (EOD TIF) for that particular instrument. This is made available via SFTP and on SelectMD. Please contact either tam@lme.com or regulatoryreporting@lme.com if you require access to this file.

The delta can be between 0 and -1 for a put option and 0 and 1 for a call option. For long call or short put positions, the DPQ should always be populated as a positive value. For short call or long put positions, the DPQ should always be populated as a negative value.

3.2.1 Delta Position Quantity examples

Please see below table for examples on how to populate DPQ for the below option positions:

Type	Position Quantity	Delta	DPQ
Long call	10	0.74251	7.43
Short call	-8	0.5	-4
Long put	17	-0.41986	-7.14
Short put	-5	-0.25	1.25

3.3 Position Maturity

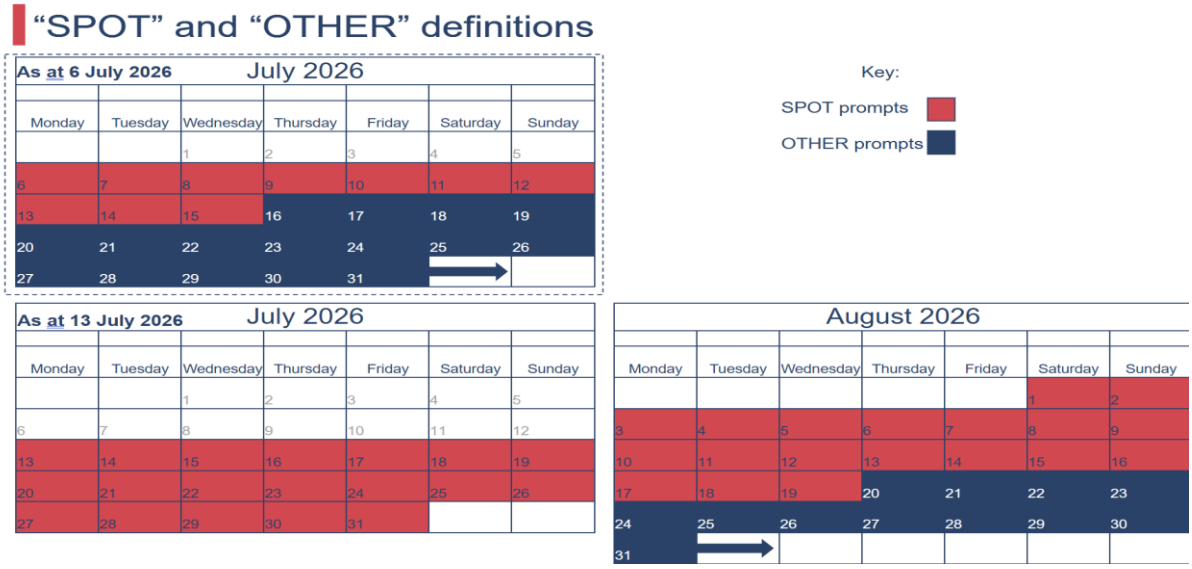
Position Maturity should be populated as “SPOT” or “OTHR” dependent on the below.

3.3.1 Daily expiring instruments

- The SPOT month for daily expiring instruments (physically settled forwards) is currently rolled to the next month **two business days before 3rd Wednesday**, i.e. usually on the Monday before 3rd Wednesday. A visual explanation is included below.
- Until that date in a particular month, daily expiring forwards with prompts up until and including the 3rd Wednesday of the current month are “SPOT” and instruments with prompts after this date are “OTHR”.
- After that date in a particular month, daily expiring forwards with prompts up until and including the 3rd Wednesday of the next month are “SPOT” and instruments with prompts after this date are “OTHR”.

A graphical explanation of the above can be seen below:

Submission Date	Business Date	CONTRACT_CODE	MATURITY	ISIN	SPOT_MONTH	CONTRACT_TYPE
06/08/2025	05/08/2025	AHD	03/09/2025	GB00KNQC8N08	OTHR	OPTN
07/08/2025	06/08/2025	AHD	03/09/2025	GB00KNQC8N08	SPOT	OPTN



3.3.2 Monthly expiring instruments

- The SPOT month for monthly expiring instruments (cash settled futures, monthly average futures, options, TAPOs) is currently rolled to the next month **when the front-month instrument in that contract expires.**
- For example, a LME Aluminium Option with prompt date 2025-09-03 should be reported as OTHR until business date 2025-08-05 (submission date 2025-08-06), and SPOT from business date 2025-08-06 (submission date 2025-08-07) until expiry. See below:
- A LME Aluminium Monthly Average Future (MAF) with prompt date 2025-08-29 should be reported as OTHR until business date 2025-07-30 (submission date 2025-07-31), and SPOT from business date 2025-07-31 (submission date 2025-08-01) until expiry. See below:

Submission Date	Business Date	CONTRACT_CODE	MATURITY	ISIN	SPOT_MONTH	CONTRACT_TYPE
31/07/2025	30/07/2025	OAD	29/08/2025	GB00H24CQ122	OTHR	MAFT
01/08/2025	31/07/2025	OAD	29/08/2025	GB00H24CQ122	SPOT	MAFT

3.4 Venue Product Code

The Venue Product Code (VPC) reported should be the first two letters of the Contract Code for that instrument as per the EOD TIF.

For example, if a position was submitted for ISIN GB00KNQFB300, the correct VPC would be "AH" as this ISIN is for an Aluminium Future, with the Contract Code being "AHD".

Failure to populate this correctly will lead to a notification that a resubmission is required and a potential delay to the submission of the record to the regulator. The resubmission should be made as soon as possible and no later than 3.30pm that day, so the resubmission can be sent to the FCA that day.

3.5 Position Type

The Position Type reported should be “FUTR” or “OTHR” for positions submitted where the instrument is not an LME Option or a TAPO. The Position Type reported should be “OPTN” for positions submitted where the instrument is an LME Option or a TAPO.

Failure to populate this correctly will lead to a notification that a resubmission is required and a potential delay to the submission of the record to the regulator. The resubmission should be made as soon as possible and no later than 3.30pm that day, so the resubmission can be sent to the FCA that day.

3.6 Position Holder ID / Ultimate Parent Entity ID

We request that Members ensure they are taking adequate steps to ensure the accuracy of data they are reporting in the Ultimate Parent Entity ID field in relation to the underlying Position Holder ID field.

Whilst there is no “golden source” for international beneficial ownership of legal entities, the LME has seen instances where different values of Ultimate Parent Entity ID are being submitted for the same Position Holder ID on the same business date across different Members. We have therefore identified this as a potential area of concern in terms of data quality.

3.7 Position Holder ID / Position Holder Category

We request that Members ensure they are taking adequate steps to ensure the accuracy of data they are reporting in the Position Holder Category field in relation to the underlying Position Holder ID field.

Whilst there is no “golden source” for the population of Position Holder Category, the LME has seen instances where different values of Position Holder Category are being submitted for the same Position Holder ID on the same business date across different Members. We have therefore identified this as a potential area of concern in terms of data quality.

4 Submission Times

Members are required to submit position reporting files to the Universal Data Gateway ("UDG") by **08:30 each working day**, reflecting positions as at close of business the previous business day (T-1). Upon submission to the LME, Members receive feedback files notifying the Member whether the file has been accepted, partially accepted or rejected by LME. Members are required to review feedback files and ensure that on receipt of a rejection, every effort is made to ensure that corrected files are submitted to the LME at the earliest opportunity.

At **16:30 each working day**, the LME submits all positions submitted from the Members and accepted in UDG to the FCA via the MDP portal website. Details of rejected records are then sent onto Members by the LME's Regulatory Reporting team (RRT).

5 Rejections and resubmissions

A record can be rejected due to two reasons:

- *"Syntactic"* rejection. This can occur at record level, for example where a non-numeric character is populated in a field where a numeric value is expected. This can also occur at file level, for example where the name of the file is not submitted as per the expected naming convention (please see the UDG specification document for further information).
- *"Semantic"* rejection. This will occur where a record submitted fails one of the mandatory data validations. In this case, the Member will be notified via an email from the RRT and requested to resubmit.

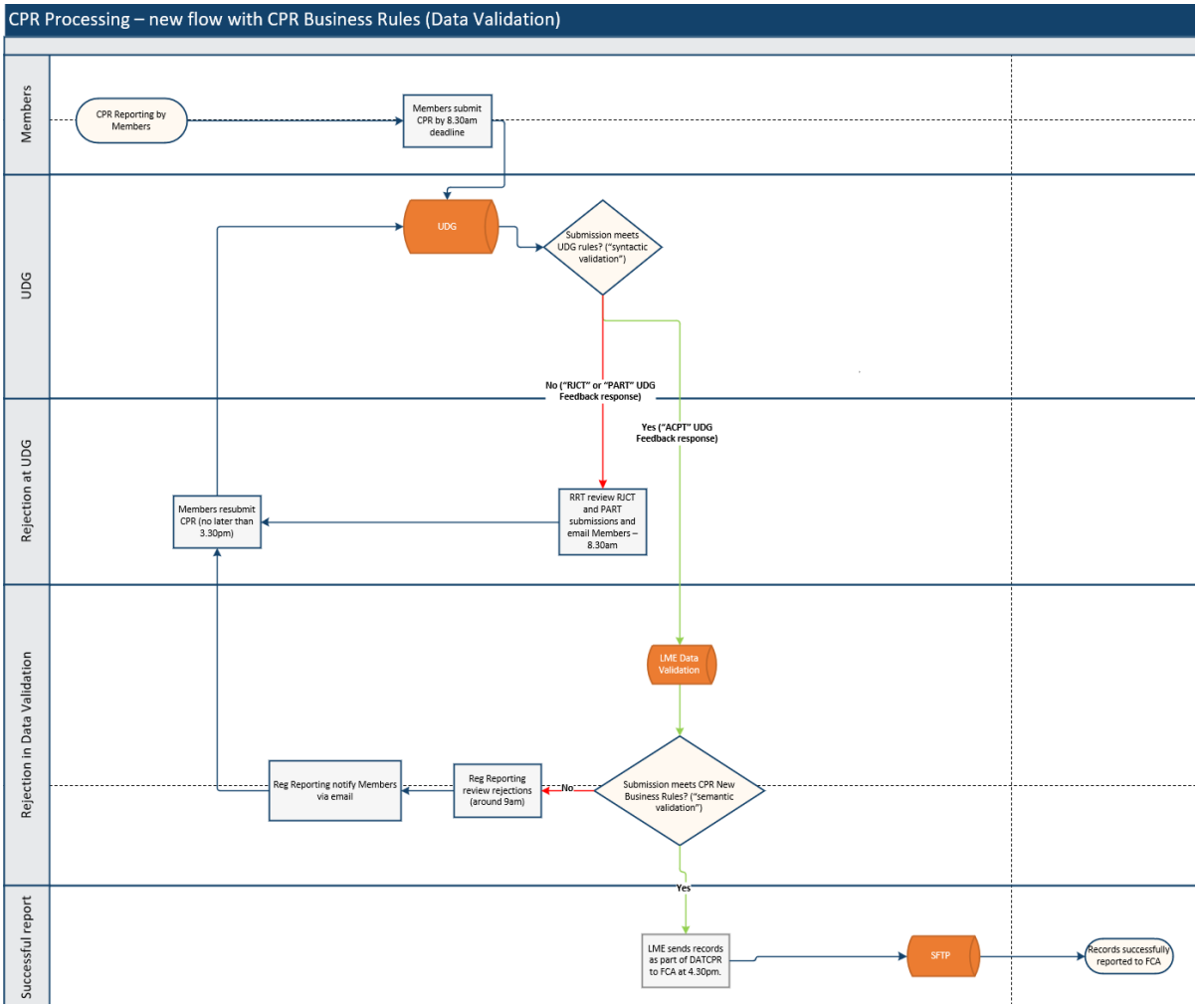
If a file is rejected in UDG, this will lead to a file with status = "RJCT" (rejected). If one or more positions in that file are rejected in UDG, this will lead to a file with status = "PART" (partially accepted). The rejected file, or rejected records within the file, will need to be submitted with a status of "NEWT".

If a file is accepted in UDG but fails "semantic" validation, the status of the file in UDG will be "ACPT" (accepted). The rejected records within the file will need to be submitted with a status of "AMND".

In each case, the RRT will contact the Member and ask for the rejected records, or file, to be resubmitted. This should be done as soon as possible, **but no later than 15:30 that working day.**

A diagram explaining this flow can be seen on the next page:

5.1 CPR Processing flow



6 File structure

Members will need to adopt the below schema as published by the FCA. This is based upon the ITS4 XML format as set out by the FIA for CPR reporting. Members should note the LME has mandated all FIA optional record detail fields. Members should follow the XSD for constructing the submission file. The XSD can be found at the below link on the "MiFID reporting specification documents and examples" section. This is entitled: "**PS25-1 CPR UDG XSD for Members - go-live July 2026".**

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Please note that the LME have deliberately omitted "Exemption Reference" as a field on this specification, as the FCA have confirmed that this is an optional field. We will therefore not be reporting this to the regulator and will not request this from Members.

6.1 Header

Field no	Field name	Description	Tag ID	Mandatory/ Optional: M/O	Standard/ Extension ITS4: S/E	Data Type
1	Version	The schema version. The version will increment every time there is a change to the schema	/FinInstrmRptgTradgComPosRpt/Header/VersionInfo /Version	M	E	{ALPHANUM-25}
2	Description	Short description of the schema version	/FinInstrmRptgTradgComPosRpt/Header/VersionInfo /Notes	M	E	{ALPHANUM-50}
3	Environment	Identifies environment: PRO - production SIM - simulation/test environment	/FinInstrmRptgTradgComPosRpt/Header/Environment	M	E	{ALPHANUM-3}

Field no	Field name	Description	Tag ID	Mandatory/ Optional: M/O	Standard/ Extension ITS4: S/E	Data Type
4	SubmissionID	Submission identifier for all the reports in the message. It can be used to track the message through processing.	/FinInstrmRptgTradgComPosRpt/Header/SubmissionID	M	E	{ALPHANUM-50}
5	SubmitterID	Submitting party identifier. This is the Member submitting the file to the LME.	/FinInstrmRptgTradgComPosRpt/Header/SubmitterID	M	E	{ALPHANUM-35}
6	ReceiverID	Receiving party Identifier. This will always be the LME.	/FinInstrmRptgTradgComPosRpt/Header/ReceiverID	M	E	{ALPHANUM-35}
7	UltimateReceivingNCA	The national competent authority who will ultimately receive the final report. This will always be the FCA.	/FinInstrmRptgTradgComPosRpt/Header/UltimateReceivingNCA	M	E	{ALPHANUM-35}

6.2 Report Body

Field no	Field name	Description	Tag ID	Mandatory/ Optional: M/O	Standard/ Extension ITS4: S/E	Data Type
8	Report reference number	The unique identifier given by the submitter unambiguously identifying the report to both submitter and receiving competent authority.	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/ReportRefNo	M	S	{ALPHANUM-52}
9	Date and time of report submission	The date and time on which the report is submitted.	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/RptDt	M	S	{DATE_TIME_FORMAT}
10	Date of the trading day of the reported position	The date on which the reported position is held at the close of the trading day on the LME.	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/BusDt	M	S	{DATEFORMAT}

Field no	Field name	Description	Tag ID	Mandatory/ Optional: M/O	Standard/ Extension ITS4: S/E	Data Type
11	Reporting entity ID	The identifier of the reporting entity. The Legal Entity Identifier code (LEI) for legal entities or {NATIONAL_ID} for natural persons not having an LEI.	/FinInstrmRptgTradgComPosRpt/CPR/<ReportStatus>/CPRBody/RptEnt/LEI or /FinInstrmRptgTradgComPosRpt/CPR/<ReportStatus>/CPRBody/RptEnt/NationalID/Othr/Id with /FinInstrmRptgTradgComPosRpt/CPR/<ReportStatus>/CPRBody/RptEnt/NationalID/Othr/SchmeNm/Cd or /FinInstrmRptgTradgComPosRpt/CPR/<ReportStatus>/CPRBody/RptEnt/NationalID/Othr/SchmeNm/Prtry	M	S	{LEI} or {NATIONAL_ID} – (Natural persons)
12	Reporting Entity's Member ID	This is the LME Member mnemonic.	/FinInstrmRptgTradgComPosRpt/CPR/<ReportStatus>/CPRBody/RptEntMemberID	M	E	{ALPHANUM-35}
13	Position account reference	LMEC position account reference i.e. the LMEC position holders account reference.	/FinInstrmRptgTradgComPosRpt/CPR/<ReportStatus>/CPRBody/PstnAcct	M	E	{ALPHANUM-200}

Field no	Field name	Description	Tag ID	Mandatory/ Optional: M/O	Standard/ Extension ITS4: S/E	Data Type
14	Position holder ID	The identifier of the position holder. The Legal Entity Identifier code (LEI) for legal entities or {NATIONAL_ID} for natural persons not having an LEI. If the position is held as a proprietary position of the reporting firm, this field will be identical to field "Reporting entity ID" above	/CPRBody/PstnHldr/NationalID/Othr/SchmeNm/Prtry (values can be CONCAT or NIDN or CCPT) /CPRBody/PstnHldr/NationalID/Othr/Id (values per the definition of CONCAT or NIDN or CCPT) or /CPRBodyPstnHldr/LEI (value per the definition of an LEI)	M	S	{LEI} or {NATIONAL_ID} – (Natural persons)
15	Position holder category	Category of the position holder, one of the following: - Investment Firm or Credit Institution - Investment Fund - Other Financial Institution - Commercial Undertaking - Operators with compliance obligations under Directive 2003/87/EC This information is required to enable the LME to produce a weekly "Commitment of Trader Report" (MAR 10 Annex 3 R)for the market and FCA.	/FinInstrmRptgTradgComPosRpt/CPR/<ReportStatus>/CPRBody/PstinHldrCategory	M	E	{ALPHANUM-65}

Field no	Field name	Description	Tag ID	Mandatory/ Optional: M/O	Standard/ Extension ITS4: S/E	Data Type
16	Email address of position holder	Email address for notifications of position related matters.	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/PstinHldrCntctEml	M	S	{ALPHANUM-256}
17	Email address of ultimate parent entity	Email address for correspondence in relation to aggregated positions. In the event that the entity does not have a parent entity, this field should be populated with the same address as provided in Field 16 “Email address of position holder”.	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/ParentPstinHldrCntctEml	M	S	{ALPHANUM-256}
18	Parent of collective investment scheme status	Field to report on whether the position holder is a collective investment undertaking that makes investment decisions independently from its parent as set out by Article 4(2) of RTS 21. ‘TRUE’ – the position holder is a collective investment undertaking that makes independent investment decisions ‘FALSE’ – the position holder is not a collective investment undertaking that makes independent investment decisions	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/PstinHldrIsIdpdtInd	M	S	{BOOLEAN}

Field no	Field name	Description	Tag ID	Mandatory/ Optional: M/O	Standard/ Extension ITS4: S/E	Data Type
19	Ultimate parent entity ID	Identifier of the ultimate parent of the position holder when positions of group entities are aggregated. The Legal Entity Identifier code (LEI) for legal entities or {NATIONAL_ID} for natural persons not having an LEI. Note: this field may be identical to field “Reporting entity ID” and/or “Position holder ID” above if the ultimate parent entity holds its own positions, or makes its own reports.	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/PrntEnt/LEI or /FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/PrntEnt/NationalID/Othr/Id /FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/PrntEnt/NationalID/Othr/SchmeN m/Cd with /FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/PrntEnt/NationalID/Othr/SchmeN m/Prtry	M	S	{ALPHANUM-35}
20	Identification code of contract traded on trading venues	ISIN code assigned to the instrument	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/ISIN	M	S	{ALPHANUM-12}
21	Venue product code	LME product code i.e. AH, AA, CA etc. This identifier utilised by the LME groups together different contracts, resulting from with different prompt dates and strike prices in the same product where they have different ISINs.	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/VenProdCde	M	S	{ALPHANUM-2}
22	Trading venue identifier	The LME MIC is “XLME”.	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/TrdngVenID	M	S	{ALPHANUM-4}

Field no	Field name	Description	Tag ID	Mandatory/ Optional: M/O	Standard/ Extension ITS4: S/E	Data Type
23	Position type	Indicates whether the position is in a future or option. 'FUTR' – Futures 'OPTN' – Options, includes separately tradable options on FUTR, SDRV or OTHR types, excluding products where the optionality is only an embedded element.	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/PstnTyp	M	S	{ALPHANUM-4}

Field no	Field name	Description	Tag ID	Mandatory/ Optional: M/O	Standard/ Extension ITS4: S/E	Data Type
24	Position maturity	Indicator of whether the maturity of the contracts comprising the reported position relates to the spot month or to all other months. Note: separate reports are required for spot months and all other months. RTS 21 Article 2 provides a definition of “spot month contract” as being the commodity derivative contract in relation to a particular underlying commodity whose maturity is the next to expire in accordance with the rules set by the LME. Further to this, “other months” contract is defined as any commodity derivative contract that is not a spot month contract. - SPOT: Spot month - OTHR: All other months	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/PstnMtrty	M	S	{ALPHANUM-4}

Field no	Field name	Description	Tag ID	Mandatory/ Optional: M/O	Standard/ Extension ITS4: S/E	Data Type
25	Position quantity	The net position quantity held in the commodity derivative, expressed either in lots (when the position limits are expressed in lots) or units of the underlying. This field should be populated with a positive number for long positions and a negative number for short positions. Positions for both SPOT and OTHR months should be reported on a net basis, whereby all long and short positions in the spot month are aggregated together and likewise for the other months.	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/PstnQty	M	S	{DECIMAL-15,2}

Field no	Field name	Description	Tag ID	Mandatory/ Optional: M/O	Standard/ Extension ITS4: S/E	Data Type
26	Notation of the position quantity	This field shall be populated with the units used to report the position quantity. LOTS - if the position quantity is expressed in lots UNIT - if the position quantity is expressed in units. OTHER - A description of the units used if the position quantity is expressed in units of the underlying must be reported in the "PstnQtyUoMDesc" field	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/PstnQtyUoM	M	S	{ALPHANUM-6}
27	Related to "Notation of the position quantity" above	Specify if "Notation of the position quantity" is OTHER. A description of the units used if the position quantity is expressed in units of the underlying.	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/PstnQtyUoMDesc	M where field 26 = 'OTHER'	S	{ALPHANUM-5}

28	Delta equivalent position quantity	If the Position Type is OPTN this field will contain the delta equivalent quantity of the position reported in the Position Quantity field. - a positive number for long calls and short puts - a negative number for long puts and short calls Option positions should be converted into positions in their respective future contracts positions on the basis of the current delta to arrive at a delta equivalent futures position. Long delta equivalent positions on calls and short delta equivalent positions on puts should be added to long positions on futures. Short delta equivalent positions on calls and long delta equivalent positions on puts should be added to short positions on futures. If available, position holders should use the delta value published in the LME Tradeable Instruments File (TIF) to report their positions in options. In the absence of a published delta value, position holders may use their own calculation. Position holders should be able to demonstrate, on	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/DeltaPstnQty	M where field 23 = 'OPTN'. This field should not be populated for non-options contracts.	S	{DECIMAL-15,2}

Field no	Field name	Description	Tag ID	Mandatory/ Optional: M/O	Standard/ Extension ITS4: S/E	Data Type
		demand, to the National Competent Authority responsible for the application of the position limit that their calculations correctly reflect the value of the option.				
29	Indicator of whether the position is risk reducing in relation to commercial activity	Field to report whether the position is risk reducing in accordance with MAR 10.2. 'TRUE' –the position is risk reducing 'FALSE' –the position is not risk reducing	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/RiskRdcInd	M	S	{BOOLEAN}
30	Client data is non investing firm	Field to report whether the client holding the position is a non-investing firm in accordance with MAR 10.2. 'TRUE' – non investing firm 'FALSE' –investing firm	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/ClientData/IsNonInvestFirm	M	E	{BOOLEAN}
31	Client data is hedging exempt	Field to report whether the client holding the position is hedging exempt in accordance with MAR 10.2. 'TRUE' – hedging exempt 'FALSE' –not hedging exempt	/FinInstrmRptgTradgComPosRpt/CPR/<Report Status>/CPRBody/ClientData/IsHedgingExempt	M	E	{BOOLEAN}

Field no	Field name	Description	Tag ID	Mandatory/ Optional: M/O	Standard/ Extension ITS4: S/E	Data Type
32	Exemption type	Indicator of the type of exemption, if any, explicitly granted by the LME and associated with the position. If the position is not subject to an exemption granted by the LME, this field should remain empty. These exemptions are detailed in MAR 10.2. Valid values • “LIQD” – Indicator of whether the position is entered into as part of an obligation to provide liquidity • “PASS” – Indicator of whether the position is a pass-through of a hedging exemption • “RISK” – Indicator of whether the position is risk reducing in relation to commercial activity	/FinInstrmRptgTradgComPosRpt/CPR/<ReportStatus>/CPRBody/ExemptionType	O	E	{ALPHANUM-4}

6.3 Table showing suggested population for fields 29, 31 and 32

The below table contains information on how fields 29, 31 and 32 should be populated for various scenarios.

Scenario	Indicator of whether the position is risk reducing in relation to commercial activity (29)	Client data is hedging exempt (31)	Exemption type (32)
Client position is speculative	FALSE	FALSE	<blank>
Client position is 'Risk reducing in relation to commercial activity' but LME have not approved a hedging exemption from position limits.	TRUE	TRUE	<blank>
Client position is 'Risk reducing in relation to commercial activity' and LME have approved a hedging exemption from position limits.	TRUE	TRUE	RISK
Client is a registered market maker and LME have granted a liquidity provider exemption from position limits.	FALSE	FALSE	LIQD
Client is a financial entity and the LME have granted a pass-through exemption from position limits.	FALSE	FALSE	PASS

6.4 CPR Submissions XML Examples

6.4.1 NEWT – New Position

```
<?xml version="1.0" encoding="UTF-8"?>
<Document
xmlns:xs="http://www.w3.org/2001/XMLSchema" xmlns="urn:efet:org:xsd:composrpt.002.1.0">
 <FinInstrmRptgTradgComPosRpt>
  <Header>
   <VersionInfo>
    <Version>CDPR v2.1.0</Version>
    <Notes>Commodity Derivative Position Report</Notes>
   </VersionInfo>
   <Environment>PRO</Environment>
   <SubmissionID>ABC123</SubmissionID>
   <SubmitterID>ABC</SubmitterID>
   <ReceiverID>LME</ReceiverID>
   <UltimateReceivingNCA>FCA</UltimateReceivingNCA>
  </Header>
<CPR>
 <NEWT>
  <ReportRefNo>ITS4REPORT0000001</ReportRefNo>
  <CPRBody>
   <RptDt>2025-09-18T07:13:34Z</RptDt>
   <BusDt>2025-09-17</BusDt>
   <RptEnt>
    <LEI>LNIESAYE8YOZQ4HW5207</LEI>
   </RptEnt>
   <RptEntMemberID>ABC</RptEntMemberID>
   <PstnAcct>ABC_H_1</PstnAcct>
   <PstnHldr>
    <NationalID>
     <Othr>
      <Id>XXXXXX12345AAAA</Id>
     SchmeNm>
     </Othr>
```

```
      </NationalID>
    </PstnHldr>
    <PstinHldrCategory>Investment Fund</PstinHldrCategory>
    <PstinHldrCntctEml>joe.bloggs@example.com</PstinHldrCntctEml>
    <ParentPstinHldrCntctEml>joe.trader@example.com</ParentPstinHldrCntctEml>
<PstinHldrIsIdpdtInd>TRUE</PstinHldrIsIdpdtInd>
    <PrntEnt>
      <LEI>LNIESAYE8YOZQ4HW5299</LEI>
    </PrntEnt>
    <ISIN>GB0123456789</ISIN>
    <VenProdCde>AH</VenProdCde>
    <TrdngVenID>XLME</TrdngVenID>
    <PstnTyp>FUTR</PstnTyp>
    <PstnMtrty>OTHR</PstnMtrty>
    <PstnQty>10</PstnQty>
    <PstnQtyUoM>LOTS</PstnQtyUoM>
   <RiskRdcInd>TRUE</RiskRdcInd>
    <ExemptionType>PASS</ExemptionType>
   <ClientData>
     <IsNonInvestFirm>TRUE</IsNonInvestFirm>
     <IsHedgingExempt>FALSE</IsHedgingExempt>
   </ClientData>
  </CPRBody>
 </NEWT>
</CPR>
```

6.4.2 AMND – Amended Position

```
<CPR>
 <AMND>
  <ReportRefNo>ITS4REPORT0000002</ReportRefNo>
  <CPRBody>
    <RptDt>2025-09-18T07:13:34Z</RptDt>
    <BusDt>2025-09-17</BusDt>
    <RptEnt>
      <LEI>LNIESAYE8YOZQ4HW5207</LEI>
    </RptEnt>
```

```
    <RptEntMemberID>XYZ</RptEntMemberID>
    <PstnAcct>XYZ_H_1</PstnAcct>
    <PstnHldr>
      <LEI>LNIESAYE8YOZQ4HW5207</LEI>
    </PstnHldr>
    <PstinHldrCategory>Investment Fund</PstinHldrCategory>
    <PstinHldrCntctEml>joe.trader@example.com</PstinHldrCntctEml>
    <ParentPstinHldrCntctEml>joe.bloggs@trading.com</ParentPstinHldrCntctEml>
    <PstinHldrIsIdpdtInd>TRUE</PstinHldrIsIdpdtInd>
    <PrntEnt>
      <LEI>LNIESAYE8YOZQ4HW5299</LEI>
    </PrntEnt>
    <ISIN>GB9876543210</ISIN>
    <VenProdCde>ZS</VenProdCde>
    <TrdngVenID>XLME</TrdngVenID>
<PstnTyp>OPTN</PstnTyp>
    <PstnMtrty>OTHR</PstnMtrty>
    <PstnQty>500</PstnQty>
    <PstnQtyUoM>UNIT</PstnQtyUoM>
    <PstnQtyUoMDesc>LOTS</PstnQtyUoMDesc>
    <DeltaPstnQty>100</DeltaPstnQty>
    <RiskRdcInd>TRUE</RiskRdcInd>
    <ClientData>
      <IsNonInvestFirm>TRUE</IsNonInvestFirm>
      <IsHedgingExempt>FALSE</IsHedgingExempt>
    </ClientData>
   </CPRBody>
  </AMND>
 </CPR>
 </FinInstrmRptgTradgComPosRpt>
</Document>
```

6.4.3 CANC – Cancelled position

```
<CPR>
 <CANC>
```

```
<ReportRefNo>20250901ABCGB00KNQJG376</ReportRefNo>
    <CPRBody>
     <RptDt>2025-09-02T04:38:21Z</RptDt>
     <BusDt>2025-09-01</BusDt>
     <RptEnt>
      <LEI>549300ZIBGCG0W5V8P60</LEI>
     </RptEnt>
     <RptEntMemberID>ABC</RptEntMemberID>
     <PstnAcct>ABC_H_1</PstnAcct>
     <PstnHldr>
      <LEI>549300ZIBGCG0W5V8P60</LEI>
     </PstnHldr>
     <PstinHldrCategory>Investment Firm or Credit Institution</PstinHldrCategory>
     <PstinHldrCntctEml>compliance@trading.com</PstinHldrCntctEml>
     <ParentPstinHldrCntctEml>compliance@trading.com</ParentPstinHldrCntctEml>
     <PstinHldrIsIdpdtInd>FALSE</PstinHldrIsIdpdtInd>
     <PrntEnt>
      <LEI>549300ZIBGCG0W5V8P60</LEI>
     </PrntEnt>
     <ISIN>GB00KNQJG376</ISIN>
     <VenProdCde>CA</VenProdCde>
     <TrdngVenID>XLME</TrdngVenID>
     <PstnTyp>FUTR</PstnTyp>
     <PstnMtrty>OTHR</PstnMtrty>
     <PstnQty>1</PstnQty>
     <PstnQtyUoM>LOTS</PstnQtyUoM>
     <RiskRdcInd>FALSE</RiskRdcInd>
     <ClientData>
      <IsNonInvestFirm>FALSE</IsNonInvestFirm>
      <IsHedgingExempt>FALSE</IsHedgingExempt>
     </ClientData>
```

```
    </CPRBody>
  </CANC>
 </CPR>
</FinInstrmRptgTradgComPosRpt>
</Document>
```

7 Naming Convention

Members should upload XML files into the appropriate folders within the inbound folder of UDG.

The filename of the XML files submitted to the LME must comply with the following naming convention: *<MemberMnemonic>_<FileType>_<SeqNo>-<PreviousSeqNo>-<Year>.xml*

For example:

- ABC_POSSUB_000358-000357-25.xml

Component	Definition	Value
<MemberMnemonic>	3-character identifier of the member submitting the file to the LME.	XXX e.g. ABC
<FileType>	A 6-character attribute identifying the type of information contained within the file. First 3 characters: "OTC" = OTC "POS" = Positions "PII" = Personal Information Second 3 characters: "SUB" = submission	OTCSUB – For OTC POSSUB – For CPR PIISUB – for PII
<SeqNo>	A 6-digit sequence number, left padded with zeroes to uniquely identify the submission to the submitter. The sequence numbers are unique to each <file type>.	nnnnnn e.g. 000001

Component	Definition	Value
	The first submission of each year shall be 000001 and incremented for subsequent submissions. The sequence restarts each year. From 999999 this will roll over to 000001 Note: Members will need to update the SeqNo in all cases with one exception – the case where they have sent a file with a name that does not match the file name pattern of: XXX_XXXXX_NNNNNN-NNNNNN-NN.xml	
<PreviousSeqNo>	The 6-digit sequence number of the previously accepted, or partially accepted, submission. This is used to ensure strict submission sequence processing. Note: when a submission fails and has been resubmitted with an incremented <SeqNo>, the <PreviousSeqNo> will be dependent on the previous submission status response from UDG: Accepted file - <SeqNo> for this file will count as the <PreviousSeqNo> Partial - <SeqNo> for this file will count as the <PreviousSeqNo> Reject - <SeqNo> for this file will NOT count as the <PreviousSeqNo>	nnnnnn e.g. 000000

Component	Definition	Value
	Corrupt - <SeqNo> for this file will NOT count as the <PreviousSeqNo>	
<Year>	The last two digits of the year when the file was generated. For example, for a file created during 2025 the year will be 25.	nn

8 UDG File Validation Rules

The table below describes the UDG content validation rules that will be applied to every commodity derivative position that has been submitted in a valid file.

Please note that these are different from the data validations referenced in section 3.1.

Field	Validation Rule	Error Code	Error Text
Date and time of report submission	The submission date/time must be the same or before the system date/time.	PRS-001	The date of report submission cannot be a future date
Date of the trading day of the reported position	Trading date must be the same or before the system date	PRS-002	The date of the trading day cannot be a future date
Date of the trading day of the reported position	Trading date cannot be earlier than five years before the current date	PRS-003	The date of the trading day cannot be more than five years old
Report Status	The new (NEWT) status can only be used for the first submission of a position report, or when the last report successfully processed with the same unique key as the NEWT had a status of cancel (CANC).	PRS-004	The value (NEWT) in the Report Status field is invalid
Report Status	The amended (AMND) status can only be used where the last report successfully processed with the same unique key as the AMND had a status of NEWT or AMND.	PRS-005	The value (AMND) in the Report Status field is invalid

Field	Validation Rule	Error Code	Error Text
Report Status	The CANC status can only be used when the last report successfully processed with the same unique key as the CANC has a status of NEWT or AMND.	PRS-006	The value (CANC) in the Report Status field is invalid
Reporting entity ID	If LEI is used, this field will be populated with a LEI accurately formatted and in the LEI database included in the Global Legal Entity Identifier Foundation (GLEIF) database maintained by the Central Operating Unit. 1. The status of the LEI shall be 'Issued', 'Lapsed', 'Pending transfer' or 'Pending archival'. 2. The InitialRegistrationDate of the LEI will be equal or before the trading date. 3. The EntityStatus is to be active. If the EntityStatus is inactive, the LastUpdateDate will be equal or after the trading date.	PRS-007	The LEI of the reporting entity is invalid, or is not valid for the trade date
Reporting entity ID	If national identifier is used, the first 2 characters of the national identification code should be an ISO 3166 country code that was valid at the trading date.	PRS-008	Reporting entity national identification code does not include a valid country code
Reporting entity ID	In case the CONCAT code is used, only the following characters are allowed: Capital Latin letters, Numbers, #. It should be a string of exactly 20 characters where first two characters are letters, the next 8 characters are numbers and the remaining characters are letters or #, where 11th and 16th characters are letters. In case national identification number or passport number is used, only the following characters are allowed: Capital Latin letters, Numbers, +, -. It can be a string of 3 to 35 characters, where first two characters are letters.	PRS-009	The format of the reporting entity identification code is incorrect

Field	Validation Rule	Error Code	Error Text
Position holder ID	If LEI is used, this field shall be populated with a LEI accurately formatted and in the LEI database included in the GLEIF database maintained by the Central Operating Unit. 1. The status of the LEI shall be 'Issued', 'Lapsed', 'Pending transfer' or 'Pending archival'. 2. The InitialRegistrationDate of the LEI will be equal or before the trading date. 3. The EntityStatus shall be Active or if the EntityStatus is Inactive, the LastUpdateDate shall be equal or after the trading date.	PRS-010	The LEI of the position holder is invalid or is not valid for the trade date
Position holder ID	If national identifier is used, the first 2 characters of the national identification code should be an ISO 3166 country code that was valid at the trading date.	PRS-011	Position holder national identification code does not include a valid country code
Position holder ID	In case the CONCAT code is used, only the following characters are allowed: Capital Latin letters, Numbers, #. It should be a string of exactly 20 characters where first two characters are letters, the next 8 characters are numbers and the remaining characters are letters or #, where 11th and 16th characters are letters. In case national identification number or passport number is used, only the following characters are allowed: Capital Latin letters, Numbers, +, -. It can be a string of 3 to 35 characters, where first two characters are letters.	PRS-012	The format of the position holder identification code is incorrect
Ultimate parent entity ID	If LEI is used, this field shall be populated with a LEI accurately formatted and in the LEI database included in the GLEIF database maintained by the Central Operating Unit. 1. The status of the LEI shall be 'Issued', 'Lapsed', 'Pending transfer' or 'Pending archival'.	PRS-013	The LEI of the Ultimate Parent is invalid or is not valid for the trade date

Field	Validation Rule	Error Code	Error Text
	2. The InitialRegistrationDate of the LEI will be equal or before the trading date. 3. The EntityStatus shall be Active or if the EntityStatus is Inactive, the LastUpdateDate shall be equal or after the trading date		
Ultimate parent entity ID	If national identifier is used, the first 2 characters of the national identification code should be an ISO 3166 country code that was valid at the trading date.	PRS-014	Ultimate Parent national identification code does not include a valid country code
Ultimate parent entity ID	In case the CONCAT code is used, only the following characters are allowed: Capital Latin letters, Numbers, #. It should be a string of exactly 20 characters where first two characters are letters, the next 8 characters are numbers and the remaining characters are letters or #, where 11th and 16th characters are letters. In case national identification number or passport number is used, only the following characters are allowed: Capital Latin letters, Numbers, +, -. It can be a string of 3 to 35 characters, where first two characters are letters.	PRS-015	The format of the ultimate parent identification code is incorrect
ISIN	The reported identifying code of the contract must be valid for the reported trading day.	PRS-016	The ISIN of the contract is invalid or is not valid for the trade date
Venue product code	When the Trading Venue Identifier is populated with a MIC (not XXXX or XOFF) the Venue Product Code, Trading Venue Identifier, and Notation of the Position quantity combination must be valid for the reported trading day. These fields will be validated using reference data held by the LME.	PRS-017	The Venue Product Code and/or Trading Venue Identifier is not recognised, or the combination is not valid for the trade date, or the Notation of the Position Quantity is not associated with the Venue Product Code.
Venue product code	Where Trading Venue Identifier is XXXX or XOFF, the Venue Product Code and Notation of the Position Quantity combination must be valid for the reported trading day. This field	PRS-018	The Venue Product Code and/or Notation of the Position Quantity is not recognised, or the

Field	Validation Rule	Error Code	Error Text
	will be validated using reference data held by the LME		combination is not valid for the trade date.
Trading venue identifier	Trading Venue Identifier is populated with LME's MIC: XLME	PRS-019	Invalid Trading Venue code
Position maturity	Position Maturity must be equal to SPOT if Position Type is one of the following values: "EMIS" or "SDRV"	PRS-020	The Position Maturity of EMIS and SDRV contracts should be reported as SPOT
Notation of the position quantity	If the notation of the position quantity is not UNIT or LOTS then an alternative value must be provided	PRS-021	A notation must be provided
Notation of the position quantity	The free text {ALPHANUM-25} option for notation must not equal "UNIT" or "LOTS"	PRS-022	Notation provided for position quantity is invalid
Notation of the position quantity	The free text {ALPHANUM-25} option for notation must be unpopulated if the notation is "LOTS" or "UNIT"	PRS-023	Only one notation should be provided
Delta equivalent position quantity	Delta equivalent position quantity must be populated if Position Type is "OPTN	PRS-024	The Delta Equivalent Position Quantity field must be populated where the Position Type is OPTN
Delta equivalent position quantity	Delta equivalent position quantity must be blank if Position Type is any of the following values: "FUTR","SDRV" or "OTHR"	PRS-025	The Delta Equivalent Position Quantity field must be blank where the Position Type is FUTR, SDRV or OTHR
Internal System Error	Time out detected when writing record	PRS-026	Timeout System Error Please resubmit record
	An invalid reporting entity type has been detected (relevant to Reporting Entity ID field). Valid reporting entity types are LEI, Passport, National ID, or CONCAT	PRS-027	Unknown ID Type
	A mandatory field has been omitted, or the content of a mandatory field is empty or contains all white space	PRS-028	Mandatory Field Missing – [FieldName]
Date of the trading day of the reported position	Only dates post implementation of MiFID II (3 January 2018) are valid for the reporting of a position.	PRS-029	The date of the trading day (BusDt) cannot be before 3rd January 2018

Field	Validation Rule	Error Code	Error Text
Date and time of report submission	If the date reported in the BusDt field is the same as the date of file submission then the submission to UDG must be made after 21:00.	PRS-030	File must be received after 21:00 (system time) if the BusDt is for the current date
Report Reference Number	This reference should be unique within the file submission. If multiple instances of the reference are found the records will be rejected.	PRS-031	The Report reference number (ReportRefNo) should be unique within the file
Position Holder Contact Email	Whitespace is not allowed at the start, end or in the middle of this value.	PRS-032	Position Holder Contact Email contains whitespace
Parent Position Holder Contact Email	Whitespace is not allowed at the start, end or in the middle of this value.	PRS-033	Parent Position Holder Contact Email contains whitespace