



## CFTC Swap Data Reporting Requirements Disclosure

Deutsche Bank Aktiengesellschaft (“DBAG”), as a provisionally-registered swap dealer with the Commodity Futures Trading Commission (the “CFTC”), is required to comply with the CFTC’s swap data reporting and public dissemination regulatory requirements as promulgated under the Title VII of The Dodd-Frank Wall Street Reform and Consumer Act and the CFTC implementing regulations as codified in Parts 43 and 45 (the “Reporting Rules”).

On September 17, 2020, the CFTC adopted extensive modifications to the Reporting Rules that generally simplified reporting requirements and harmonized them with global standards with the goal to improve transparency, mitigate systemic risk, and prevent market abuse by the global aggregation of data via the standardization of reporting across jurisdictions. The amendments go into effect on **December 5, 2022**.

In lieu of the existing Unique Swap Identifier (the “USI”), the CFTC adopted a requirement to identify swaps using the Unique Transaction Identifier (the “UTI”), consistent with the CPMI-IOSCO technical guidance (“Harmonisation of the Unique Transaction Identifier (UTI), guidance issued by CPMI-IOSCO<sup>1</sup>”).

Based on the foregoing, please note that, beginning December 5, 2022, DBAG will report new transactions pursuant to the ISO standardized guidelines for UTI as follows:

- **Field Content:** The UTI will continue to be made of two parts; a prefix and a Trade ID with a maximum limit of 52 characters, consistent with ISO 23897<sup>2</sup> guidelines:
  - The prefix will become the current full Legal Entity Identifier (the “LEI”) of the generating entity (DBAG) in accordance with ISO 17442<sup>3</sup>, which is 20 characters long;

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<sup>1</sup> <https://www.iosco.org/news/pdf/IOSCONEWS453.pdf>

<sup>2</sup> <https://www.iso.org/standard/77308.html>

<sup>3</sup> <https://www.iso.org/standard/78829.html>

- The Trade ID will remain in the same format (up to 32 digits long), generated by DBAG, which is within the criteria outlined in ISO 23897 guidelines.

DBAG encourages its counterparties to test the upcoming USI-to-UTI transformation to validate the ingestion by their back-office systems to ensure accurate UTI adoption pursuant to the Reporting Rules after December 5, 2022.

Should you have any further questions please reach out to [df.protocol@db.com](mailto:df.protocol@db.com) .