

ICE Futures Abu Dhabi Large Trader File Submission Guidance

February 2025



Large Trader File Submission Guidance

1. Summary

The purpose of the Large Trader File Submission Guidance (Guidance) is to provide a summary overview of the position reporting thresholds for each ICE Futures Abu Dhabi Futures (IFAD / Exchange) contracts. Firms are required to submit daily Large Trader (LGTR) files to the Exchange for positions exceeding the relevant reportable thresholds. LGTR files detail the number of open futures contracts for each account being reported.

Position reporting is fundamental to the Exchange's position management framework, which serves to protect market participants and the integrity of IFAD markets.

Each reporting firm should ensure that it has appropriate systems and controls in place to ensure the file is accurate.

2. Who must report?

Per Rule J2 of the Exchange Rules, the requirement to submit daily LGTR files applies to each Member, individual or entity that owns, controls, or carries for another person an account with reportable positions ("Reporting Firms").

Prior to reporting positions for the first time, firms must contact the Exchange's Market Oversight department to notify them of the intention to report; this ensures that Exchange systems are set up appropriately to receive the Reporting Firm's position data.

3. When should a LGTR file be submitted?

Reporting Firms must submit LGTR files by 14:00 (UK local time) for positions held at the end of the previous business day. Any expected delays should be reported to Market Oversight immediately.

The responsibility of ensuring that the LGTR is submitted correctly to the Exchange is solely that of the Reporting Firm. Reporting Firms should advise their relevant Exchange Member(s) (where applicable) of their reporting arrangements.

Positions held on the Exchange are required to be reported on all UK and UAE Public Holidays on which the Exchange is open for trading.

Where a reportable position ceases to exist in a contract, the Reporting Firm should report a zero position for one day after the cessation of that reportable position in the LGTR file.

Reporting Firms are required to report positions in their LGTR file until the Final Settlement Date.

4. Position Reporting Thresholds

Positions of a size that exceed the Exchange's reportable thresholds are required to be reported. Reporting Firms can submit positions below these Reportable Thresholds but are not obligated to do so. The reportable thresholds are set out in Table 1 below.

Table 1- ICE Futures Abu Dhabi Reportable Thresholds

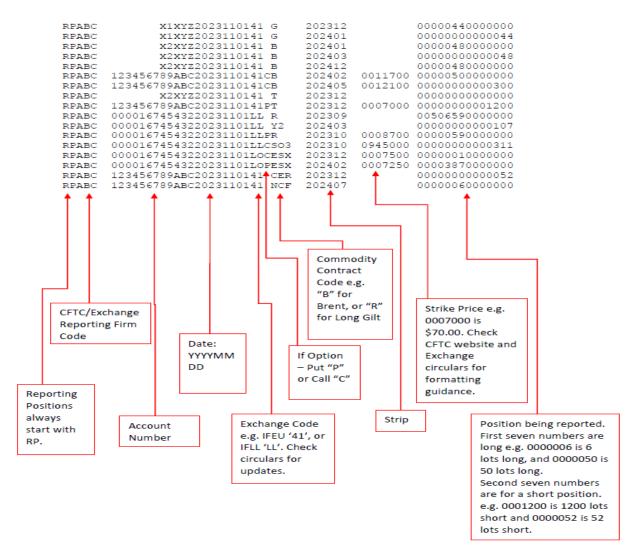
| Contract | Contract Code | Exchange Reporting Code | Market Identifier Code (MIC) | Reportable Positions |
|--|------------------|-------------------------------|---------------------------------------|--|
| All ICE Futures Abu Dhabi Futures Contracts for MIC Code IFAD | - | AD | IFAD | All positions in all contract months and all positions in all daily contracts. |

A list of ICE Futures Abu Dhabi contracts can be found here.

5. What does a LGTR file look like?

All required records must be submitted together in a single file. Each record is 80 characters long where each character will relate to a specific column where the requested data should be placed. An example of the format is set out in Table 1 below.

Table 1:



All required records must be submitted together in a single file. Each record is 80 characters long. The specific record format is shown in Table 2 below:

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Table 2:

| RECORD LAYOUT | | | | |
|------------------|--------|------|---------------------|--|
| Beginning Column | Length | Туре | Name | |
| 1 | 2 | AN | Report Type | |
| 3 | 3 | AN | Reporting Firm | |
| 6 | 2 | - | Reserved | |
| 8 | 12 | AN | Account Number | |
| 20 | 8 | AN | Report Date | |
| 28 | 2 | AN | Exchange Code | |
| 30 | 1 | AN | Put or Call | |
| 31 | 5 | AN | Commodity Code (1) | |
| 36 | 8 | AN | Expiration Date (1) | |
| 44 | 7 | S | Strike Price | |
| 51 | 1 | AN | Exercise Style | |
| 52 | 7 | N | Long-Buy-Stopped | |
| 59 | 7 | N | Short-Sell-Issued | |
| 66 | 5 | AN | Commodity Code (2) | |
| 71 | 8 | AN | Expiration Date (2) | |
| 79 | 1 | - | Reserved | |
| 80 | 1 | AN | Record Type | |

- 1. **Report Type** should be set to "RP". Please note that "DN" (delivery reporting notice) and "EP" (exchange for physical) type records should <u>not</u> be submitted to ICE Futures Europe.
- 2. **Reporting Firm** an alphabetic identifier assigned by the Exchange or CFTC (if also reporting to the CFTC) to identify Reporting Firms.
- 3. **Account Number** a unique identifier assigned by the Reporting Firm to each special account. The field is zero or space filled with account number right justified.
- 4. **Report Date** the format is YYYYMMDD, where YYYY is the year, MM is the month, and DD is the day of the month.
- 5. **Exchange Code** this is a two-character field used to identify the Exchange on which a position is held (per Table 1).
- 6. **Put or Call** valid values for this field are "C" for a call option and "P" for a put option. For futures, the field is blank. This is not relevant for IFAD contracts.
- 7. **Commodity (1)** an Exchange-assigned commodity code (or "PCC") for the futures or options contract.¹
- 8. **Expiration Date (1)** the date format is YYYYMMDD and represents the expiration date of the reported futures or options contract. For date-specific instruments such as flexible products, the full date must be reported.
- 9. **Strike price** this is a signed numeric field for reporting option strike prices. This not relevant for IFAD contracts.

¹ Refer to https://www.ice.com/products or <u>https://www.ice.com/api/productguide/info/codes/all/csv</u> for Exchange PCC's

Please see IFAD_Delivery_Limit_and_Position_Limit.pdf for additional information.

6. LGTR File Naming Convention

There is no specific file naming convention for LGTR files being submitted to IFAD. If multiple files are being submitted (e.g. one file for Exchange Code 41 and one file for Exchange Code LX), it is recommended that these files should have different names to each other in order to prevent any processing errors, for example:

LGTRyyyymmddFileX.txt and LGTRyyyymmddFileY.txt

As a suggested naming convention, LGTRyyyymmdd may be used where yyyymmdd is the trading date for which the position report relates to (i.e. file containing data for 01 November 2023 would be dated 20231101).

7. How to report the LGTR File to ICE Futures Abu Dhabi

Access Authentication

A LGTR / OCR account can be used for the automated or manual uploading & downloading of files. Access is provisioned via MFT by a public key ("Key") which is a system generated key pair in place of a password and avoids embedding passwords in data files or scripts. A Key also avoids the possibility that a password is changed by an interactive user that subsequently causes an automation process to fail.

Connectivity to MFT is provided via SFTP. This connectivity can be provisioned over the public internet or via any of the existing dedicated connections available for connection to the ICE Data Centre. Additional information concerning connectivity options is available on the ICE website here: https://www.theice.com/connectivity.

Should you require assistance in accessing MFT, please reach out to support@ice.com.

MFT Trading Access Request

Each Reporting Firm uploading a Position Reporting Large Trader File (LGTR) will each have a dedicated <ICE-mnemonic>/LGTR folder for this purpose. To request MFT access for position reporting please contact ICE Futures Abu Dhabi Compliance at Compliance-IFAD-MarketOversight@Thelce.com or on +971 (0)22 45 4915 / +971 (0)22 45 4920 to request a MFT User Access Form. This form will need to be completed, signed and returned with a public key to ICE Futures Abu Dhabi Market Oversight.

Reporting Firms should be aware that the source of their IP address may need to be whitelisted in the ICE Firewall. Reporting Firms can click on the following link that will show their IP address: www.theice.com/showip. Once Reporting Firms have their IP address, they can submit an email requesting that the IP address be added to the whitelist. Alternatively, Reporting Firms should consult with their IT Support Teams who should be able to provide their source IP.

Submitting a LGTR File to MFT Trading

Reporting Firms should login with their MFT LGTR login and add their file(s) into their LGTR folder (this can be done automatically or manually). Non-members of IFAD should place their file at the root of the folder. The LGTR should not be placed in the OCR folder. Once the file has been placed in the MFT system, the file will be renamed with a 'submitted' suffix and a time stamp. MFT is a live system and Reporting Firms must not send in any false or test data. Should a Reporting Firm wish to check their LGTR before starting submissions for the first time, they can contact Exchange Market Oversight via email (Compliance-IFAD-MarketOversight@Thelce.com) and send in a file as .txt attachment.

Treatment of omnibus accounts

Where Members use 'omnibus' accounts to represent a summary of the positions in one or many underlying accounts held by an affiliate organisation of the Member, or a client of the Member, it is important to note that the individual underlying accounts must be identified, and their positions reported.

Where the underlying accounts' positions of the Member's client are reported under the same Reporting Firm code as the Member's main reporting, it is not necessary to report the positions in the omnibus account.

Where the underlying accounts' positions are reported directly under a different Reporting Firm code, either by an affiliate or client of the Member, it is necessary to report both those positions and the position held in the omnibus account.

Reportable positions within omnibus accounts must be fully disclosed to the Exchange. Failure to do so will result in the Exchange treating all positions in the account as if they were under common ownership or control, and therefore aggregated for the purposes of position, expiry and delivery limit and accountability level calculations.

Any questions arising from this Guidance should be addressed to:

ICE Futures Abu Dhabi Compliance Department on +971 (0)22 45 4915 / +971 (0)22 45 4920 or Compliance-IFAD-MarketOversight@Thelce.com

Appendix 1 - Position Reporting MFT Trading Access Request Form

| ICE Futures Abu Dhabi Market Oversight Contacts | | |
|---|---|--|
| Telephone No: +971 (0) 22 45 4915 / +971 (0) 22 45 4920 | Email: Compliance-IFAD-MarketOversight@Thelce.com | |

Position Reporting Firm

| | Member Mnemonic and CFTC ID | |
|-----------|---------------------------------------|--|
| Firm Name | Non-members CFTC Reporting Firm ID | |

Confirm the MIC codes that positions will be reported in:

| IFEU | IFLX | IFLL | IFLO | NDEX | IFAD |
|------|------|------|------|------|------|
| | | | | | |

MFT Trading allows automated or ad-hoc transfer of electronic position reporting files generated by Members and firms that must conform to the ICE Futures Europe Position Reporting regime. ICE supports public-key authenticated system accounts for SFTP file transfer. To make use of the automated SFTP file transfer, your systems administration or Information Security department will be required to submit a public key for use in authenticating this account.

| Public Key | |
|------------|--|
| | |

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Environment

Please indicate whether you are seeking access to the TEST or LIVE environment (Select ONE only)

| TEST | LIVE | |
|------|------|--|
| | | |

Contact Point for Set up of Automated Access

| First Name | Last Name | Job Title / Department | Telephone | Email |
|------------|-----------|---------------------------|-----------|-------|
| | | | | |

Approval

The request must be approved by your nominated Security Coordinator or Clearing Manager.

| Signature | |
|--------------------|--|
| Approved By (Name) | |
| Job Title | |

For ICE Use Only

| Approved By (Name) | |
|--------------------|--|
| Notes | |