
Technical Guidance Document for 17 CFR Parts 15, 17, 18, and 20 Ownership and Control Reports, Forms 102/102S, 40/40S, and 71

Ownership and Control Reports Forms 102A/102B/102S, 40/40S, and 71 Technical Guidance Document June 30, 2014 Version 4



CFTC

Commodity Futures Trading
Commission

This Technical Guidance Document (the “Technical Document”) provides technical specifications for transmitting Forms 102A, 102B, 102S, 40 and 71 via FTP XML submissions. This Technical Document is for informational use only, and is not a legal document. It is intended as a supplement to the OCR Final Rule (as defined below), which rule contains the regulatory requirements applicable to parties submitting the forms described above. When reviewing this Technical Document, reporting parties should review and consult the OCR Final Rule, including the requirements of the reporting forms attached as an appendix thereto. This Technical Document was drafted consistent with the OCR Final Rule, and all relevant communications from Commission staff are also intended to be consistent with the OCR Final Rule. In the event of any conflict between the requirements of the OCR Final Rule (including the questions and instructions on the reporting forms attached thereto) and either (a) this Technical

Document or (b) any verbal communications by Commission staff regarding this Technical Document or the OCR Final Rule, the OCR Final Rule controls.

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Change Log

| Version | Date | Change |
|----------|-----------|--|
| 2 | 2/20/2014 | ORGTTYPE variable removed from file name, and replaced with “OCR” for all file names, to simplify file naming process. See “Name the File(s) for XML submission” |
| 2 | 2/20/2014 | Additional Secure FTP instructions added. See “Connect to CFTC with Secure FTP” |
| 2 | 2/20/2014 | Valid values provided for the reporting market required in Form 102A, question 9. See row 82 in Form 102A schema. |
| 2 | 2/20/2014 | Erroneous line removed in Appendix A: SFTP Account Registration. |
| 3 | | |
| 3 | 4/29/2014 | Modified file naming convention to remove static “OCR” value. See “Name the File(s) for XML submission” |
| 3 | 4/29/2014 | Modified field length for Identifier field in file name. See “Name the File(s) for XML submission” |
| 3 | 4/29/2014 | Consolidated cftcBatch attributes and moved to new cftcHeader element. See rows 1-4 in “Data Dictionary for OCR Batch Header” |
| 3 | 4/29/2014 | Added formCount element to cftcHeader. See row 5 in “Data Dictionary for OCR Batch Header” |
| 3 | 4/29/2014 | Modified formNumber element to be a required element. See row 1 in “Data Dictionary for Form 102 Cover Sheet” |
| 3 | 4/29/2014 | Added entityType attribute to cftcForm102 element. See row 5 in “Data Dictionary for Form 102 Cover Sheet” |
| 3 | 4/29/2014 | Added ‘Ownership of a reportable position’ as a valid value for originReason element. See rows 2 and 5 in Form 102A schema |
| 3 | 4/29/2014 | Fixed erroneous XML reference in row 14 of Form 102A schema |
| 3 | 4/29/2014 | Moved marketIdentifier attribute to relatedAcctInfo element, to permit reporting of multiple reporting markets in connection with a single trading account. See row 82 in Form 102A schema and row 5 in 102B schema. |
| 3 | 4/29/2014 | Fixed erroneous references in question for reporting firms that are foreign brokers. See row 154 in Form 102A schema |
| 3 | 4/29/2014 | Added signature elements for each 102 form submission. See, e.g., rows 170-177 in Form 102A schema |
| 3 | 4/29/2014 | Added paired swap and swaption indicators for 102S submissions. See rows 81-82 in Form 102S schema |
| 3 | 4/29/2014 | Updated signature blocks in Form 40 schema. See rows 221-228 |
| 3 | 4/29/2014 | Removed duplicative row in Supplemental List III in Appendix B |
| 4 | | |
| 4 | 7/1/2014 | Added ISO 3166-2 standard as valid value for state/subdivision fields. See, e.g., row 10 in Form 102 Coversheet |
| 4 | 7/1/2014 | Added ISO 3166-1 alpha-2 standard as valid value for country fields. See, e.g., row 11 in Form 102 Coversheet |

| | | |
|---|----------|---|
| 4 | 7/1/2014 | Added Middle Name and Suffix fields for Special Account Owner and Controller contact information. See rows 25-26 and 52-53 in Form 102A schema |
| 4 | 7/1/2014 | Moved Volume Threshold Account information fields on form 102B from relatedAccount element to cftcForm102 element. See, e.g., row 2 in Form 102B schema |
| 4 | 7/1/2014 | Moved Volume Threshold Account Originator, Owner and Controller relatedEntity element under cftcForm102. See, e.g., row 9 in Form 102B schema |
| 4 | 7/1/2014 | Added relatedAcctInfo element under cftcForm102 element. See row 4 in Form 102B schema |
| 4 | 7/1/2014 | Added isSpecialAccount attribute on cftcForm102 element. See row 3 in Form 102S schema |
| 4 | 7/1/2014 | Moved Consolidated Account information fields on form 102S from relatedAccount element to cftcForm102 element. See, e.g., row 3 in Form 102S schema |
| 4 | 7/1/2014 | Moved Consolidated Account Originator, Owner and Controller relatedEntity element under cftcForm102. See, e.g., row 5 in Form 102S schema |
| 4 | 7/1/2014 | Added pairedSwapOrSwaptionActivity element under cftcForm102 element. See rows 82-84 in Form 102S schema |

Introduction

On November 18, 2013, the Commodity Futures Trading Commission (“Commission” or “CFTC”) adopted new rules and related forms to enhance its identification of futures and swap market participants (the “OCR Final Rule”). These final rules leverage the Commission's current position and transaction reporting programs by requiring the electronic submission of trader identification and market participant data on amended Forms 102 and 40, and on new Form 71. The new and amended forms require the reporting of certain trading accounts active on reporting markets that are designated contract markets or swap execution facilities. Among other information, the forms collect ownership and control information with respect to both position-based special accounts and trading accounts that meet specified volume-based reporting levels. This Technical Document is intended to provide technical specifications for transmitting Forms 102A, 102B, 102S, 40 and 71 via FTP XML submissions. At a later date, either an additional guidance document or an updated version of this document will be provided for registration and submission procedures in connection with the web-based CFTC Portal.

OCR Final Rule

When reviewing this Technical Document, reporting parties should review and consult the OCR Final Rule, including the requirements of the reporting forms attached as an appendix thereto. Reporting parties should visit this link¹ to view the OCR Final Rule on the Federal Register; visit this link² to view a pdf copy of the OCR Final Rule.

Technical Requirements

Please forward questions regarding format, content, and transmission of OCR data submissions to the CFTC at OCRTechSupport@cftc.gov.

OCR Submission Procedure(s)

There are two methods for submission of OCR related data – 1. CFTC Secure FTP or 2. CFTC Portal Electronic Form:³

CFTC Secure FTP

1. Create the report(s) and consolidate the report(s) into an XML-formatted file.
2. Name the file(s) using the OCR Reporting file name format.
3. Assemble and compress the files.
4. Connect to the CFTC FTP site.
5. Transmit the electronically formatted records to the Commission using Secure FTP.

Name the File(s) for XML submission

File Naming Convention – Batch Submission

- The file name for submission should be created in the following manner:

¹ <https://www.federalregister.gov/articles/2013/11/18/2013-26789/ownership-and-control-reports-forms-102102s-4040s-and-71>

² <http://www.cftc.gov/ucm/groups/public/@lrfederalregister/documents/file/2013-26789a.pdf>

³ See preceding Introduction for information regarding guidance on the Portal.

OCRFORM_[FORMNUMBER]_[IDENTIFIER]_[YYYYMMDD]_[SOURCE].format

File Naming Convention - Test Files

- Data providers can test their submissions by appending the string “TEST” to the end of their file names.

OCRFORM_[FORMNUMBER]_[IDENTIFIER]_[YYYYMMDD]_[SOURCE]_TEST.format

Your firm can contact our Technical Support representative at OCRTechSupport@cftc.gov to verify the results of test data you have submitted.

FORMNUMBER:

| Form Number Submitted in File | FORMNUMBER in File Name |
|-------------------------------|-------------------------|
| Form 102a, 102b, or 102s | 102 |
| Form 71 | 71 |
| Form 40 | 40 |

For each different form number submitted send a separate XML file. For example, if you are submitting both a Form 102 and 71, they should be separate XML files. Also note for multiple submissions of the same form number they can be included in a single XML file. For example, if you are submitting multiple Form 102s, they can be in a single XML file.

IDENTIFIER:

This field is the 3 character identifier provided by the CFTC during the account registration process.

YYYYMMDD:

This field is the year (4 digits), month, and day of the report date.

SOURCE:

This field is the 1 character identifier which will be used to identify the origination of the file.

| File Origination | SOURCE in Filename |
|-----------------------------|--------------------|
| Secure FTP Batch Submission | E |

FORMAT:

| Format of the File | FORMAT in Filename |
|--------------------|--------------------|
| XML | formxml |

Assemble and Compress the File(s)

The files should be compressed using an industry compression tool. Possible compression utilities are WinZip or GZIP. WinZip is available at <http://www.winzip.com>, and the GZIP utility is freely available at <http://www.gzip.org>.

Connect to CFTC with Secure FTP

The CFTC uses Secure FTP (SFTP) to receive files. Reporting parties that are transmitting files to the CFTC will need to obtain a Secure FTP client that is FIPS 140-2 compliant. Through the Secure FTP client, reporters can navigate to traders.cftc.gov and use their User ID and password to login and transmit XML submission files.

Reporting parties' SFTP account is already configured to require a password. If reporters want to bypass the password requirement, they will need to generate a Key Pair and send an email to FtpSupport@cftc.gov which issues reporters' Public Key and User ID. Reporters should keep their Private Key secure and only use it to communicate with the CFTC. The CFTC can accept two types of Keys: SSH Version 2.0 RSA key pair with bit strength between 2048 - 4096 or SSH Version 2.0 DSA 1024 bit key pair.

Many OCR reporting parties may already have FTP or SFTP accounts. Reporting parties with SFTP accounts can continue to use those accounts for OCR reporting. New reporters who do not already have an SFTP account, or reporters who only use non-secure FTP accounts, must request a Secure FTP account from the CFTC. See Appendix A to this Technical Document for FTP registration steps.

Transmit the File(s)

Transfer the compressed file(s) using normal FTP commands.

Upon receipt of the file, software at the CFTC will ingest the file through our firewall and begin processing the data.

Data Dictionary for OCR Batch Header

| | Data Dictionary for OCR Batch Header-Data Element | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|----|--|-----------------|--|---|-------------------------------|
| 1. | Message Transmit Datetime | Yes | Date of OCR Batch Submission | The format is YYYY-MM-DDThh:mm:ss[+ -]hh:mm , where YYYY is the year, MM is the month, DD is the day of the month, hh is the hour of the day, mm is the minute of the hour and [+ -]hh:mm is the time zone offset. | cftcBatch/cftcHeader@sentDate |
| 2. | Submission Contact Email | Yes | Contact email for Batch Submission | | cftcBatch/cftcHeader@email |
| 3. | Submission Sent By Identifier | Yes | This field is the 3 character identifier provided by the CFTC during the account registration process for firm | | cftcBatch/cftcHeader@sentBy |

| | Data Dictionary for OCR Batch Header-Data Element | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-----------|--|-----------------|---|---------------------|---------------------------------|
| | | | submitting batch file | | |
| 4. | On Behalf of identifier | No | CFTC-issued 3 character reporting firm identifier for firm reported in submission | | cftcBatch/cftcHeader@onBehalfOf |
| 5. | Form Count | Yes | Identifies number of form submissions included in batch | | cftcBatch/cftcHeader@formCount |

Data Dictionary for Form 102 Cover Sheet

| | Data Dictionary for Form 102 Cover Sheet-Data Element | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-----------|--|-----------------|---|---------------------|----------------------------------|
| 1. | Form Number | Yes | | 102 | cftcBatch/cftcForm102@formNumber |

| | Data Dictionary for Form 102 Cover Sheet-Data Element | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|----|---|-----------------|---|---|--|
| 2. | Reportable Account Type Indicator | Yes | Indicates the type of account for which the reporting entity is reporting. | SA = Special Account (102A) VT = Volume Threshold Account (102B) CA = Consolidated Account (102S) | cftcBatch/cftcForm102@accountCategory |
| 3. | Follow-On Information Will be Submitted Later | Yes | Indicates certain “Follow-On Information” will be submitted by a later date specified in § 17.02 ⁴ | Y = Yes N = No | cftcBatch/cftcForm102@FollowOnInformationToCome |
| 4. | Optional Fields or Supplemental Fields Reported to LEI Provider | Yes | Indicates that one or more “Optional Fields” or “Supplemental Fields” not included in this submission were reported to the CICI Utility (or | Y = Yes N = No | cftcBatch/cftcForm102@OptionalOrSuppFieldsSeparatelyReported |

⁴ For additional information on “Follow-On Information”, “Optional Fields” and “Supplemental Fields”, see the footnotes to the reporting forms in Appendix A of the OCR Final Rule.

| | Data Dictionary for Form 102 Cover Sheet- Data Element | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-----------|---|---|---|---------------------|---------------------------------------|
| | | | other CFTC-approved LEI provider) and are associated with the LEI provided in this submission | | |
| 5. | Reporting Firm Entity Type | Conditional. Required if OptionalOrSuppFieldsSeparatelyReported = 'N' | Entity type of the reporting entity | LE = Legal Entity | cftcBatch/cftcForm102@entityType |
| 6. | Name of Reporting Firm | Conditional. Required if OptionalOrSuppFieldsSeparatelyReported = 'N' | Legal name of the reporting entity | | cftcBatch/cftcForm102@legalEntityName |
| 7. | Reporting Firm Street Address | Conditional. Required if OptionalOrSuppFieldsSeparatelyReported = 'N' | Street address of the reporting entity | | cftcBatch/cftcForm102@street |
| 8. | Reporting Firm Suite | No | Suite of the reporting entity | | cftcBatch/cftcForm102@suite |
| 9. | Reporting Firm City | Conditional. Required if OptionalOrSuppF | City of the reporting entity | | cftcBatch/cftcForm102@city |

| | Data Dictionary for Form 102 Cover Sheet- Data Element | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---|---|--|---|---|
| | | ieldsSeparatelyReported = 'N' | | | |
| 10. | Reporting Firm State | Conditional. Required if OptionalOrSuppFieldsSeparatelyReported = 'N' | State/Subdivision of the reporting entity | ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters | cftcBatch/cftcForm102@state |
| 11. | Reporting Firm Country | Conditional. Required if OptionalOrSuppFieldsSeparatelyReported = 'N' | Country of the reporting entity | ISO 3166-1 alpha-2 country code | cftcBatch/cftcForm102@country |
| 12. | Reporting Firm Zip/Postal Code | Conditional. Required if OptionalOrSuppFieldsSeparatelyReported = 'N' | Zip code or postal code of the reporting entity | | cftcBatch/cftcForm102@postalCode |
| 13. | Reporting Firm Contact Natural Person Last Name | Conditional. Required if OptionalOrSuppFieldsSeparatelyReported = 'N' | Surname of the natural person who is a contact at the reporting entity | | cftcBatch/cftcForm102/contact@lastName |
| 14. | Reporting Firm Contact Natural Person First | Conditional. Required if OptionalOrSuppFieldsSeparatelyRe | Given or first in order name of the natural person who is a contact | | cftcBatch/cftcForm102/contact@firstName |

| | Data Dictionary for Form 102 Cover Sheet- Data Element | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---|---|--|---------------------|---|
| | Name | ported = 'N' | at the reporting entity | | |
| 15. | Reporting Firm Contact Middle Name | No | Middle name of the natural person who is a contact at the reporting entity | | cftcBatch/cftcForm102/contact@middleName |
| 16. | Reporting Firm Contact Suffix | No | Suffix of the natural person who is a contact at the reporting entity | | cftcBatch/cftcForm102/contact@nameSuffix |
| 17. | Reporting Firm Contact Job Title | Conditional. Required if OptionalOrSuppFieldsSeparatelyReported = 'N' | Job title of the contact at the reporting entity | | cftcBatch/cftcForm102/contact@titleOrPosition |
| 18. | Reporting Firm Contact Phone Number | Conditional. Required if OptionalOrSuppFieldsSeparatelyReported = 'N' | Telephone number of the contact at the reporting entity | | cftcBatch/cftcForm102/contact@telephone |
| 19. | Reporting Firm Contact Email Address | Conditional. Required if OptionalOrSuppFieldsSeparatelyRe | Email address of the contact at the reporting entity | | cftcBatch/cftcForm102/contact@email |

| | Data Dictionary for Form 102 Cover Sheet-Data Element | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|---|---|---------------------|---|
| | | ported = 'N' | | | |
| 20. | Reporting Firm Website | Conditional. Required if information available AND OptionalOrSuppFieldsSeparatelyReported = 'N' | URL of the reporting entity's website | | cftcBatch/cftcForm102@website |
| 21. | Reporting Firm NFA ID | Conditional. Required if information available AND OptionalOrSuppFieldsSeparatelyReported = 'N' | The identification number given to the reporting entity by the National Futures Association | | cftcBatch/cftcForm102@NFAIdentifier |
| 22. | Reporting Firm Legal Entity Identifier | Conditional. Required if OptionalOrSuppFieldsSeparatelyReported = 'Y' | The legal entity identifier (LEI) assigned to the reporting firm by the LEI issuer | | cftcBatch/cftcForm102@legalEntityIdentifier |

| | Data Dictionary for Form 102 Cover Sheet-Data Element | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|---|---|---------------------|------------------------------------|
| 23. | Reporting Firm Type – futures commission merchant | Conditional. Required if OptionalOrSuppFieldsSeparatelyReported = 'N' | Indicates the type of reporting entity ⁵ | Y = Yes N = No | cftcBatch/cftcForm102@isFCM |
| 24. | Reporting Firm Type – clearing member | Conditional. Required if OptionalOrSuppFieldsSeparatelyReported = 'N' | Indicates the type of reporting entity | Y = Yes N = No | cftcBatch/cftcForm102@isCM |
| 25. | Reporting Firm Type – Foreign Broker | Conditional. Required if OptionalOrSuppFieldsSeparatelyReported = 'N' | Indicates the type of reporting entity | Y = Yes N = No | cftcBatch/cftcForm102@isFB |
| 26. | Reporting Firm Type – Swap Dealer | Conditional. Required if OptionalOrSuppFieldsSeparatelyReported = 'N' | Indicates the type of reporting entity | Y = Yes N = No | cftcBatch/cftcForm102@isSwapDealer |

⁵ If a reporting party is submitting a 102A and reporting a special account that is active on multiple markets, the party should check multiple firm types in rows 23-26, if it acts in different capacities on these markets (for example, if the reporting party acts as an FCM on one of the markets, and acts as a clearing member on another of the markets).

| | Data Dictionary for Form 102 Cover Sheet- Data Element | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-----|---|---|---|---------------------|---|
| 27. | Reporting Firm Type – Other | Conditional. Required if OptionalOrSuppFieldsSeparatelyReported = 'N' | Indicates the type of reporting entity | Y = Yes N = No | cftcBatch/cftcForm102@isOther |
| 28. | Other Reporting Firm Type | Conditional. Required if isOther = 'Y' | Entity type of the reporting entity if isOther Indicator was selected | | cftcBatch/cftcForm102@otherDescription |
| 29. | Reporting Firm ID | Conditional. Required if OptionalOrSuppFieldsSeparatelyReported = 'N' | The alpha-numeric identifier assigned by the Commission to the reporting entity | | cftcBatch/cftcForm102@reportingIdentifier |

Data Dictionary for Form 102A – Identifying and reporting a special account⁶

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-----------|------------------------|----------------------------------|-----------------|--|-------------------------|---------------------------------------|
| 1. | New/Modified Indicator | Question 1 | Yes | Indicates whether the special account (102A) is: <ul style="list-style-type: none"> • Special account being reported for the first time • Re-submitted or modified Information for a previously reported special | N = New M = Modified | cftcBatch/cftcForm102@informationType |

⁶ When reviewing the data elements in this Technical Document, reporting parties should also review and consult the OCR Final Rule, including the requirements of the reporting forms attached as an appendix thereto. The reporting forms are the basis for these data elements. Reporting parties should visit this link to view the OCR Final Rule on the Federal Register: <https://www.federalregister.gov/articles/2013/11/18/2013-26789/ownership-and-control-reports-forms-102102s-4040s-and-71>

Visit this link to view a pdf copy of the OCR Final Rule: <http://www.cftc.gov/ucm/groups/public/@lrfederalregister/documents/file/2013-26789a.pdf>

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-----------|-----------------------------|----------------------------------|-----------------|--|---|-------------------------------------|
| | | | | account | | |
| 2. | Special Account Origination | Question 2 | Yes | Indicates for which of the following reasons the account is being reported | OO = Ownership of a reportable position ⁷ CC = Control of a reportable position OC = Ownership and control of a reportable position OM = Omnibus account with a reportable position | cftcBatch/cftcForm102@originReason |
| 3. | Special Account Number | Question 3 | Yes | Numeric identifier used by the reporting entity to uniquely identify a special account | | cftcBatch/cftcForm102@accountNumber |
| 4. | Special Account | Question 3 | Yes | The name of the special account | | cftcBatch/cftcForm102@accountName |

⁷ 'Ownership of a reportable position' has been added to make the schema conform to the choices in question 2 of Form 102A, which is included as an appendix to the OCR Final Rule. As noted in question 2 of Form 102A, however, reporting parties are not required to submit Form 102A based solely on ownership of a reportable position at this time.

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-----------|-----------------------------|----------------------------------|--|--|---------------------------|------------------------------------|
| | Name | | | assigned by the reporting firm | | |
| 5. | House or Customer Indicator | Question 4 | Conditional. Required if originReason='O O' | If the reported special account is being reported based on ownership of a reportable position, indicates whether the special account is a house or customer account of the reporting firm ⁸ | H = House C = Customer | cftcBatch/cftcForm102@accountClass |
| 6. | Omnibus Account | Question 5 | Conditional, if originReason='O M' then 'Y' else 'N' | Indicates if the reported special account is an omnibus account | Y = Yes N = No | cftcBatch/cftcForm102@isOmnibus |
| 7. | Omnibus Account Information | Question 5 | Conditional. Required if originReason='O M' | If the reported special account is an omnibus account, indicate whether the | H = House C = Customer | cftcBatch/cftcForm102@accountClass |

⁸ See preceding footnote.

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|---|---|----------------------------------|---|---|--|--|
| | | | | account is a house or customer omnibus account | | |
| SPECIAL ACCOUNT OWNER(S) CONTACT INFORMATION | | | | | | |
| 8. | Special Account Owner Indicator | Question 6 | Conditional, if originReason='O C' then isOwner = 'Y' | Indicates reporting special account owner | Y = Yes N = No | cftcBatch/cftcForm102/relatedEntity@isOwner |
| 9. | Special Account Owner Type Indicator | Question 6 | Conditional. Required if originReason='O C' | Indicates whether the special account owner is a legal entity or natural person | LE = Legal Entity NP = Natural Person | cftcBatch/cftcForm102/relatedEntity@entityType |
| 10. | Special Account Owner Optional Fields or Supplemental Fields Reported to LEI Provider | Question 6 | Conditional. Required if originReason='O C' | Indicates that one or more "Optional Fields" or "Supplemental Fields" not included in this question were reported to the CICI Utility (or other CFTC-approved LEI | Y = Yes N = No | cftcBatch/cftcForm102/relatedEntity@OptionalOrSuppFieldsSeparatelyReported |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|---|--|----------------------------------|--|---|---------------------|---|
| | | | | provider) and are associated with the LEI provided in this submission | | |
| IF SPECIAL ACCOUNT OWNER IS A LEGAL ENTITY | | | | | | |
| 11. | Special Account Owner Legal Entity Name | Question 6 | Conditional. Required if originReason='O C' AND OptionalOrSuppFieldsSeparatelyReported='N' AND entityType='LE' | Legal or registered name of the reportable account owner | | cftcBatch/cftcForm102/relatedEntity@legalEntityName |
| IF SPECIAL ACCOUNT OWNER IS A NATURAL PERSON | | | | | | |
| 12. | Special Account Owner Natural Person Last Name | Question 6 | Conditional. Required if originReason='O C' AND OptionalOrSuppFieldsSeparatelyReported='N' And entityType='NP' | Surname of the natural person reportable account owner | | cftcBatch/cftcForm102/relatedEntity@lastName |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|----------------------------------|---|---|---------------------|--|
| 13. | Special Account Owner Natural Person First Name | Question 6 | Conditional. Required if originReason='O C' AND OptionalOrSuppFieldsSeparatelyReported='N' AND entityType='NP' | Given or first in order name of the natural person reportable account owner | | cftcBatch/cftcForm102/relatedEntity@firstName |
| 14. | Special Account Owner Natural Person Middle Name | Question 6 | Conditional. Required if information is available AND originReason='O C' AND OptionalOrSuppFieldsSeparatelyReported='N' AND entityType='NP' | Middle name of the natural person reportable account owner | | cftcBatch/cftcForm102/relatedEntity@middleName |
| 15. | Special Account Owner Natural Person Suffix | Question 6 | Conditional. Required if information is available AND originReason='O C' AND OptionalOrSuppFieldsSeparatelyRe | Suffix of the natural person reportable account owner | | cftcBatch/cftcForm102/relatedEntity@nameSuffix |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|--------------------------------------|----------------------------------|---|---|---------------------|--|
| | | | ported = 'N' AND entityType='NP' | | | |
| FOR BOTH LEGAL ENTITIES AND NATURAL PERSONS | | | | | | |
| 16. | Special Account Owner Street Address | Question 6 | Conditional. Required if originReason='OC' AND OptionalOrSuppFieldsSeparatelyReported = 'N' | Street address of the reportable account owner | | cftcBatch/cftcForm102/relatedEntity@street |
| 17. | Special Account Owner Suite | Question 6 | Conditional. Required if information available AND originReason = 'OC' AND OptionalOrSuppFieldsSeparatelyReported = 'N' | Suite of the reportable account owner | | cftcBatch/cftcForm102/relatedEntity@suite |
| 18. | Special Account Owner City | Question 6 | Conditional. Required if originReason='OC' AND OptionalOrSuppFieldsSeparatelyRe | City of the reportable account owner | | cftcBatch/cftcForm102/relatedEntity@city |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---------------------------------------|----------------------------------|--|---|---------------------|--|
| | | | ported = 'N' | | | |
| 19. | Special Account Owner State | Question 6 | Conditional. Required if originReason='O C' AND OptionalOrSuppFieldsSeparatelyReported = 'N' | ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters | | cftcBatch/cftcForm102/relatedEntity@state |
| 20. | Special Account Owner Country | Question 6 | Conditional. Required if originReason='O C' AND OptionalOrSuppFieldsSeparatelyReported = 'N' | ISO 3166-1 alpha-2 country code | | cftcBatch/cftcForm102/relatedEntity@country |
| 21. | Special Account Owner Zip/Postal Code | Question 6 | Conditional. Required if originReason='O C' AND OptionalOrSuppFieldsSeparatelyReported = 'N' | Zip/Postal code of the reportable account owner | | cftcBatch/cftcForm102/relatedEntity@postalCode |
| 22. | Special Account Owner Phone Number | Question 6 | Conditional. Required if originReason='O C' AND | Phone Number of the reportable account owner | | cftcBatch/cftcForm102/relatedEntity@telephone |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|---|---|----------------------------------|--|---|---------------------|---|
| | | | OptionalOrSuppFieldsSeparatelyReported = 'N' | | | |
| 23. | Special Account Owner Email Address | Question 6 | Conditional. Required if originReason='O C' AND OptionalOrSuppFieldsSeparatelyReported = 'N' | Email address of the reportable account owner | | cftcBatch/cftcForm102/relatedEntity@email |
| IF SPECIAL ACCOUNT OWNER IS A LEGAL ENTITY | | | | | | |
| 24. | Special Account Owner Contact Last Name | Question 6 | Conditional. Required if originReason='O C' AND entityType='LE' AND OptionalOrSuppFieldsSeparatelyReported = 'N' | Surname of the contact person for the owner | | cftcBatch/cftcForm102/relatedEntity/contact@lastName |
| 25. | Special Account Owner | Question 6 | Conditional. Required if originReason='O | First name of the contact person for the owner | | cftcBatch/cftcForm102/relatedEntity/contact@firstName |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---|----------------------------------|---|---|---------------------|--|
| | Contact First Name | | C' AND entityType='LE' AND OptionalOrSuppFieldsSeparatelyReported='N' | | | |
| 26. | Special Account Owner Contact Middle Name | Question 6 | Conditional. Required if information is available AND originReason='O C' AND entityType='LE' AND OptionalOrSuppFieldsSeparatelyReported='N' | Middle name of the contact person for the owner | | cftcBatch/cftcForm102/relatedEntity/contact@middleName |
| 27. | Special Account Owner Contact Name Suffix | Question 6 | Conditional. Required if information is available AND originReason='O C' AND entityType='LE' AND OptionalOrSuppFieldsSeparatelyRe | Suffix of the contact person for the owner | | cftcBatch/cftcForm102/relatedEntity/contact@nameSuffix |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---|----------------------------------|--|--|---------------------|---|
| | | | ported = 'N' | | | |
| 28. | Special Account Owner Contact Job Title | Question 6 | Conditional. Required if originReason='O C' AND entityType='LE' AND OptionalOrSuppFieldsSeparatelyReported = 'N' | Job title of the contact person for the owner | | cftcBatch/cftcForm102/relatedEntity/contact@titleOrPosition |
| 29. | Contact Relationship to Special Account Owner | Question 6 | Conditional. Required if originReason='O C' AND entityType='LE' AND OptionalOrSuppFieldsSeparatelyReported = 'N' | Contact relationship to the owner | | cftcBatch/cftcForm102/relatedEntity/contact@relationship |
| 30. | Special Account Owner Contact Phone Number | Question 6 | Conditional. Required if originReason='O C' AND entityType='LE' AND | Phone number of the contact person for the owner | | cftcBatch/cftcForm102/relatedEntity/contact@telephone |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|---|----------------------------------|---|---|---------------------|---|
| | | | OptionalOrSuppFieldsSeparatelyReported = 'N' | | | |
| 31. | Special Account Owner Contact Email Address | Question 6 | Conditional. Required if originReason='OC' AND entityType='LE' AND OptionalOrSuppFieldsSeparatelyReported = 'N' | Email address of the contact person for the owner | | cftcBatch/cftcForm102/relatedEntity/contact@email |
| FOR BOTH LEGAL ENTITIES AND NATURAL PERSONS | | | | | | |
| 32. | Special Account Owner Website | Question 6 | Conditional. Required if information available AND originReason='OC' AND OptionalOrSuppFieldsSeparatelyReported = 'N' | URL of the owner's website | | cftcBatch/cftcForm102/relatedEntity@website |
| 33. | Special Account Owner NFA | Question 6 | Conditional. Required if information | The identification number given to the ownership | | cftcBatch/cftcForm102/relatedEntity@NFAIdentifier |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|---|----------------------------------|--|--|---------------------|---|
| | ID | | available AND originReason='O C' AND OptionalOrSuppFieldsSeparatelyReported='N' | entity by the National Futures Association | | |
| 34. | Special Account Owner Legal Entity Identifier (LEI) | Question 6 | Conditional. Required if information available AND originReason='O C' AND OptionalOrSuppFieldsSeparatelyReported='Y' | The legal entity identifier (LEI) assigned to the ownership entity by the LEI issuer | | cftcBatch/cftcForm102/relatedEntity@legalEntityIdentifier |
| SPECIAL ACCOUNT CONTROLLER(S) CONTACT INFORMATION⁹ | | | | | | |
| 35. | Special Account Controller | Question 7 | Conditional. Required if originReason = | Indicates reporting special account controller | Y = Yes N = No | cftcBatch/cftcForm102/relatedEntity@isController |

⁹ Reporting parties should provide only one value in each field for question 7 on Form 102A, which asks for the special account controller contact information. Reporting parties should not report multiple controllers in response to question 7, because the OCR Final Rule requires 102 reporting on the basis of control of a reportable position. See part 150.4 of the Commission's regulations for rules regarding the aggregation of positions based on control. Parties aggregating on the basis of control should report only a single controller in response to question 7. See OCR Final Rule pp. 69183-4.

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|----------------------------------|--|---|--|--|
| | Indicator | | 'OC' OR originReason = 'CC' then isController = 'Y' | | | |
| 36. | Special Account Controller Type Indicator | Question 7 | Conditional. Required if originReason = 'OC' OR originReason = 'CC' | Indicates whether the special account Controller is a legal entity or natural person | LE = Legal Entity NP = Natural Person | cftcBatch/cftcForm102/relatedEntity@entityType |
| 37. | Special Account Controller Optional Fields or Supplemental Fields Reported to LEI Provider | Question 7 | Conditional. Required if originReason = 'OC' OR originReason = 'CC' | Indicates that one or more "Optional Fields" or "Supplemental Fields" not included in this question were reported to the CICI Utility (or other CFTC-approved LEI provider) and are associated with the LEI provided in this submission | Y = Yes N = No | cftcBatch/cftcForm102/relatedEntity@OptionalOrSuppFieldsSeparatelyReported |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|---|----------------------------------|---|--|---------------------|---|
| IF SPECIAL ACCOUNT CONTROLLER IS A LEGAL ENTITY | | | | | | |
| 38. | Special Account Controller Legal Entity Name | Question 7 | Conditional. Required if originReason = 'OC' OR originReason = 'CC' AND entityType='LE' AND OptionalOrSuppF ieldsSeparatelyRe ported = 'N' | Legal or registered name of the reportable account Controller | | cftcBatch/cftcForm102/relatedEntity@legalEntityName |
| IF SPECIAL ACCOUNT CONTROLLER IS A NATURAL PERSON | | | | | | |
| 39. | Special Account Controller Natural Person Last Name | Question 7 | Conditional. Required if originReason = 'OC' OR originReason = 'CC' AND entityType='NP' AND OptionalOrSuppF ieldsSeparatelyRe | Surname of the natural person reportable account Controller (if natural person) | | cftcBatch/cftcForm102/relatedEntity@lastName |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---|----------------------------------|--|--|---------------------|--|
| | | | ported = 'N' | | | |
| 40. | Special Account Controller Natural Person First Name | Question 7 | Conditional. Required if originReason = 'OC' OR originReason = 'CC' AND entityType='NP' AND OptionalOrSuppFieldsSeparatelyReported = 'N' | Given or first in order name of the natural person reportable account Controller | | cftcBatch/cftcForm102/relatedEntity@firstName |
| 41. | Special Account Controller Natural Person Middle Name | Question 7 | Conditional. Required if information available AND originReason = 'OC' OR originReason = 'CC' AND entityType='NP' AND OptionalOrSuppFieldsSeparatelyRe | Middle name of the natural person reportable account Controller | | cftcBatch/cftcForm102/relatedEntity@middleName |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|--|----------------------------------|--|--|---------------------|--|
| | | | ported = 'N' | | | |
| 42. | Special Account Controller Natural Person Suffix | Question 7 | Conditional. Required if information available AND originReason = 'OC' OR originReason = 'CC' AND entityType='NP' AND OptionalOrSuppFieldsSeparatelyReported = 'N' | Suffix of the natural person reportable account Controller | | cftcBatch/cftcForm102/relatedEntity@nameSuffix |
| FOR BOTH LEGAL ENTITIES AND NATURAL PERSONS | | | | | | |
| 43. | Special Account Controller Street Address | Question 7 | Conditional. Required if originReason = 'OC' OR originReason = 'CC' AND OptionalOrSuppFieldsSeparatelyRe | Street address of the reportable account Controller | | cftcBatch/cftcForm102/relatedEntity@street |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|----------------------------------|----------------------------------|--|---|---------------------|---|
| | | | ported = 'N' | | | |
| 44. | Special Account Controller Suite | Question 7 | Conditional. Required if information available AND originReason = 'OC' OR originReason = 'CC' AND OptionalOrSuppFieldsSeparatelyReported = 'N' | Suite of the reportable account Controller | | cftcBatch/cftcForm102/relatedEntity@suite |
| 45. | Special Account Controller City | Question 7 | Conditional. Required if originReason = 'OC' OR originReason = 'CC' AND OptionalOrSuppFieldsSeparatelyReported = 'N' | City of the reportable account Controller | | cftcBatch/cftcForm102/relatedEntity@city |
| 46. | Special Account Controller | Question 7 | Conditional. Required if originReason = | ISO 3166-2 geopolitical subdivision code; | | cftcBatch/cftcForm102/relatedEntity@state |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|----------------------------------|---|---|---------------------|--|
| | State | | 'OC' OR originReason = 'CC' AND OptionalOrSuppF ieldsSeparatelyRe ported = 'N' | 1-3 alphanumeric characters | | |
| 47. | Special Account Controller Country | Question 7 | Conditional. Required if originReason = 'OC' OR originReason = 'CC' AND OptionalOrSuppF ieldsSeparatelyRe ported = 'N' | ISO 3166-1 alpha-2 country code | | cftcBatch/cftcForm102/relat edEntity@country |
| 48. | Special Account Controller Zip/Postal Code | Question 7 | Conditional. Required if originReason = 'OC' OR originReason = 'CC' AND OptionalOrSuppF ieldsSeparatelyRe ported = 'N' | Zip/Postal code of the reportable account Controller | | cftcBatch/cftcForm102/relat edEntity@postalCode |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|--|----------------------------------|--|--|---------------------|--|
| 49. | Special Account Controller Phone Number | Question 7 | Conditional. Required if originReason = 'OC' OR originReason = 'CC' AND OptionalOrSuppFieldsSeparatelyReported = 'N' | Phone Number of the reportable account Controller | | cftcBatch/cftcForm102/relatedEntity@telephone |
| 50. | Special Account Controller Email Address | Question 7 | Conditional. Required if originReason = 'OC' OR originReason = 'CC' AND OptionalOrSuppFieldsSeparatelyReported = 'N' | Email address of the reportable account Controller | | cftcBatch/cftcForm102/relatedEntity@email |
| IF SPECIAL ACCOUNT CONTROLLER IS A LEGAL ENTITY | | | | | | |
| 51. | Special Account Controller Contact Last Name | Question 7 | Conditional. Required if originReason = 'OC' OR originReason = 'CC' AND | Surname of the natural person contact for the Controller | | cftcBatch/cftcForm102/relatedEntity/contact@lastName |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|----------------------------------|--|---|---------------------|--|
| | | | entityType='LE' AND OptionalOrSuppFieldsSeparatelyReported = 'N' | | | |
| 52. | Special Account Controller Contact First Name | Question 7 | Conditional. Required if originReason = 'OC' OR originReason = 'CC' AND entityType=' LE' AND OptionalOrSuppFieldsSeparatelyReported = 'N' | First name of the natural person contact for the Controller | | cftcBatch/cftcForm102/relatedEntity/contact@firstName |
| 53. | Special Account Controller Contact Middle Name | Question 7 | Conditional. Required if information is available AND originReason='OC' OR originReason = 'CC' AND entityType='LE' | Middle name of the contact person for the Controller | | cftcBatch/cftcForm102/relatedEntity/contact@middleName |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|----------------------------------|---|---|---------------------|---|
| | | | AND OptionalOrSuppFieldsSeparatelyReported='N' | | | |
| 54. | Special Account Controller Contact Name Suffix | Question 7 | Conditional. Required if information is available AND originReason='OC' OR originReason = 'CC' AND entityType='LE' AND OptionalOrSuppFieldsSeparatelyReported='N' | Suffix of the contact person for the Controller | | cftcBatch/cftcForm102/relatedEntity/contact@nameSuffix |
| 55. | Special Account Controller Contact Job Title | Question 7 | Conditional. Required if originReason = 'OC' OR originReason = 'CC' AND entityType='LE' AND OptionalOrSuppF | Job title of the contact person for Controller entity | | cftcBatch/cftcForm102/relatedEntity/contact@titleOrPosition |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|----------------------------------|---|--|---------------------|--|
| | | | ieldsSeparatelyReported = 'N' | | | |
| 56. | Contact Relationship to Special Account Controller | Question 7 | Conditional. Required if originReason = 'OC' OR originReason = 'CC' AND entityType=' LE' AND OptionalOrSuppFieldsSeparatelyReported = 'N' | Contact relationship to the controller | | cftcBatch/cftcForm102/relatedEntity/contact@relationship |
| 57. | Special Account Controller Contact Phone Number | Question 7 | Conditional. Required if originReason = 'OC' OR originReason = 'CC' AND entityType=' LE' AND OptionalOrSuppFieldsSeparatelyRe | Phone number of the contact person for the Controller entity | | cftcBatch/cftcForm102/relatedEntity/contact@telephone |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|----------------------------------|--|---|---------------------|---|
| | | | ported = 'N' | | | |
| 58. | Special Account Controller Contact Email Address | Question 7 | Conditional. Required if originReason = 'OC' OR originReason = 'CC' AND entityType=' LE' AND OptionalOrSuppFieldsSeparatelyReported = 'N' | Email address of the contact person for the Controller entity | | cftcBatch/cftcForm102/relatedEntity/contact@email |
| 59. | Special Account Controller Website | Question 7 | Conditional. Required if information available AND originReason = 'OC' OR originReason = 'CC' AND OptionalOrSuppFieldsSeparatelyReported = 'N' | URL of the Controller's website | | cftcBatch/cftcForm102/relatedEntity@website |
| 60. | Special Account | Question 7 | Conditional. Required if | The identification number given to | | cftcBatch/cftcForm102/relatedEntity@NFAIdentifier |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|---|--|----------------------------------|--|---|---------------------|---|
| | Controller NFA ID | | information available AND originReason = 'OC' OR originReason = 'CC' AND OptionalOrSuppFieldsSeparatelyReported='N' | the Controller entity by the National Futures Association | | |
| 61. | Special Account Controller Legal Entity Identifier (LEI) | Question 7 | Conditional. Required if information available AND originReason = 'OC' OR originReason = 'CC' AND OptionalOrSuppFieldsSeparatelyReported='Y' | The legal entity identifier (LEI) assigned to the Controller entity by the LEI issuer | | cftcBatch/cftcForm102/relatedEntity@legalEntityIdentifier |
| OMNIBUS ACCOUNT ORIGINATOR CONTACT INFORMATION | | | | | | |
| 62. | Omnibus Account Originator Indicator | Question 8 | Conditional. Required if originReason = 'OM' Then | Indicates reporting special account originator | Y = Yes N = No | cftcBatch/cftcForm102/relatedEntity@isOriginator |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|----------------------------------|--|---|---------------------|--|
| | | | isOriginator='Y' | | | |
| 63. | Omnibus Account Originator Optional Fields or Supplemental Fields Reported to LEI Provider | Question 8 | Conditional. Required if originReason='O M' | Indicates that one or more "Optional Fields" or "Supplemental Fields" not included in this question were reported to the CICI Utility (or other CFTC-approved LEI provider) and are associated with the LEI provided in this submission | Y = Yes N = No | cftcBatch/cftcForm102/relatedEntity@OptionalOrSuppFieldsSeparatelyReported |
| 64. | Omnibus Account Originator Entity Type | Question 8 | Yes, entityType='LE' | | LE = Legal Entity | cftcBatch/cftcForm102/relatedEntity@entityType |
| 65. | Omnibus Account Originator Name | Question 8 | Conditional. Required if originReason='O M' AND OptionalOrSuppFieldsSeparatelyRe | Legal name of the reportable account Originator | | cftcBatch/cftcForm102/relatedEntity@legalEntityName |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---|----------------------------------|---|---|---------------------|--|
| | | | ported='N' AND entityType='LE' | | | |
| 66. | Omnibus Account Originator Street Address | Question 8 | Conditional. Required if originReason='OM' AND OptionalOrSuppFieldsSeparatelyReported='N' | Street address of the reportable account Originator | | cftcBatch/cftcForm102/relatedEntity@street |
| 67. | Omnibus Account Originator Suite | Question 8 | Conditional. Required if information available AND originReason='OM' AND OptionalOrSuppFieldsSeparatelyReported='N' | Suite of the reportable account Originator | | cftcBatch/cftcForm102/relatedEntity@suite |
| 68. | Omnibus Account Originator City | Question 8 | Conditional. Required if originReason='OM' AND OptionalOrSuppFieldsSeparatelyReported='N' | City of the reportable account Originator | | cftcBatch/cftcForm102/relatedEntity@city |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-----|--|----------------------------------|--|---|---------------------|--|
| 69. | Omnibus Account Originator State | Question 8 | Conditional. Required if originReason='O M' AND OptionalOrSuppFieldsSeparatelyReported='N' | ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters | | cftcBatch/cftcForm102/relatedEntity@state |
| 70. | Omnibus Account Originator Country | Question 8 | Conditional. Required if originReason='O M' AND OptionalOrSuppFieldsSeparatelyReported='N' | ISO 3166-1 alpha-2 country code | | cftcBatch/cftcForm102/relatedEntity@country |
| 71. | Omnibus Account Originator Zip/Postal Code | Question 8 | Conditional. Required if originReason='O M' AND OptionalOrSuppFieldsSeparatelyReported='N' | Zip/Postal code of the reportable account Originator | | cftcBatch/cftcForm102/relatedEntity@postalCode |
| 72. | Omnibus Account Originator Phone Number | Question 8 | Conditional. Required if originReason='O M' AND OptionalOrSuppFieldsSeparatelyReported='N' | Phone Number of the reportable account Originator | | cftcBatch/cftcForm102/relatedEntity@telephone |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-----|--|----------------------------------|--|--|---------------------|--|
| 73. | Omnibus Account Originator Contact Last Name | Question 8 | Conditional. Required if originReason='O M' AND OptionalOrSuppFieldsSeparatelyReported='N' | Surname of the natural person contact for the Originator | | cftcBatch/cftcForm102/relatedEntity/contact@lastName |
| 74. | Omnibus Account Originator Contact First Name | Question 8 | Conditional. Required if originReason='O M' AND OptionalOrSuppFieldsSeparatelyReported='N' | First name of the natural person contact for the Originator | | cftcBatch/cftcForm102/relatedEntity/contact@firstName |
| 75. | Omnibus Account Originator Contact Middle Name | Question 8 | Conditional. Required if originReason='O M' AND OptionalOrSuppFieldsSeparatelyReported='N' | Middle name of the natural person contact for the Originator | | cftcBatch/cftcForm102/relatedEntity/contact@middleName |
| 76. | Omnibus Account Originator Contact Suffix | Question 8 | Conditional. Required if originReason='O M' AND OptionalOrSuppFieldsSeparatelyReported='N' | Suffix of the natural person contact for the Originator | | cftcBatch/cftcForm102/relatedEntity/contact@nameSuffix |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-----|--|----------------------------------|---|--|---------------------|---|
| 77. | Omnibus Account Originator Contact Job Title | Question 8 | Conditional. Required if originReason='OM' AND OptionalOrSuppFieldsSeparatelyReported='N' | Job title of the contact person at or related to the Originator entity | | cftcBatch/cftcForm102/relatedEntity/contact@titleOrPosition |
| 78. | Contact Relationship to Omnibus Account Originator | Question 8 | Conditional. Required if originReason='OM' AND OptionalOrSuppFieldsSeparatelyReported='N' | Contact relationship to the Originator entity | | cftcBatch/cftcForm102/relatedEntity/contact@relationship |
| 79. | Omnibus Account Originator Contact Phone Number | Question 8 | Conditional. Required if originReason='OM' AND OptionalOrSuppFieldsSeparatelyReported='N' | Phone number of the contact person for the Originator entity | | cftcBatch/cftcForm102/relatedEntity/contact@telephone |
| 80. | Omnibus Account Originator Contact Email Address | Question 8 | Conditional. Required if originReason='OM' AND OptionalOrSuppFieldsSeparatelyReported='N' | Email address of the contact person for the Originator entity | | cftcBatch/cftcForm102/relatedEntity/contact@email |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|----------------------------------|--|--|---------------------|---|
| 81. | Omnibus Account Originator Website | Question 8 | Conditional. Required if information available AND originReason='O M' AND OptionalOrSuppFieldsSeparatelyReported='N' | URL of the Originator's website | | cftcBatch/cftcForm102/relatedEntity@website |
| 82. | Special Account Originator NFA ID | Question 8 | Conditional. Required if information available AND originReason='O M' AND OptionalOrSuppFieldsSeparatelyReported = 'N' | The identification number given to the Originator entity by the National Futures Association | | cftcBatch/cftcForm102/relatedEntity@NFAIdentifier |
| 83. | Omnibus Account Originator Legal Entity Identifier (LEI) | Question 8 | Conditional. Required if information available AND originReason='O M' AND OptionalOrSuppFieldsSeparatelyReported = 'Y' | The legal entity identifier (LEI) assigned to the Originator entity by the LEI issuer | | cftcBatch/cftcForm102/relatedEntity@legalEntityIdentifier |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|---|---------------------------|---|--|-------------------|---|
| IDENTIFICATION OF TRADING ACCOUNT(S) THAT COMPRISE THE SPECIAL ACCOUNT¹⁰ | | | | | | |
| 84. | Special Account Trading Account Indicator | Question 9 | Yes, isTradingAccount = 'Y' | | Y = Yes N = No | cftcBatch/cftcForm102/relatedAccount@isTradingAccount |
| 85. | Special Account Trading Account Number | Question 9 | Conditional. Required if isTradingAccount = 'Y' | For each special account reported by an entity acting as a <i>clearing member</i> , provide the trading account number | | cftcBatch/cftcForm102/relatedAccount@accountNumber |
| 86. | Short Code | Question 9 | Conditional. Required if isTradingAccount = 'Y' | For each special account reported by an entity acting as a <i>clearing member</i> , provide the | | cftcBatch/cftcForm102/relatedAccount/relatedAcctInfo@accountShortCode |

¹⁰ Page 69184 of the OCR final rule contains a discussion of how to identify the trading account numbers that comprise a special account and, by extension, identify the reporting market at which each trading account number appears. This discussion states that, "Trading accounts that comprise a position-based special account include all of those trading accounts that: (1) are used to execute trades cleared by the clearing member submitting the 102A; (2) are owned or controlled by the entity identified as owning or controlling the special account reported on a 102A; and (3) execute transactions in the same commodity or commodities in which the special account has a reportable position."

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|---|----------------------------------|---|---|--|---|
| | | | | related short code | | |
| 87. | Reporting Market ¹¹ | Question 9 | Conditional. Required if isTradingAccount = 'Y' | Identify the reporting market at which each trading account number appears | ISO Market Identifier Code (MIC) located at: http://www.iso15022.org/MIC/homepageMIC.htm ¹² | cftcBatch/cftcForm102/relatedAccount/relatedAcctInfo@marketIdentifier |
| TRADING ACCOUNT OWNERSHIP AND CONTROL INFORMATION | | | | | | |
| OMNIBUS ACCOUNT INFORMATION | | | | | | |
| 88. | Trading Account Omnibus Account Indicator | Question 10i | Conditional. Required if isTradingAccount = 'Y' | For each trading account identified in question 9, is such account an omnibus account | Y = Yes N = No | cftcBatch/cftcForm102/relatedAccount@isOmnibus |
| 89. | House or Customer Indicator | Question 10i | Conditional. Required if isTradingAccount = 'Y' | If the reportable Trading Account is being reported as an Omnibus | H = House C = Customer | cftcBatch/cftcForm102/relatedAccount@accountClass |

¹¹ See preceding footnote.

¹² See the CFTC website at <http://www.cftc.gov/IndustryOversight/TradingOrganizations/index.htm> for a list of trading organizations regulated by the CFTC.

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---|----------------------------------|--|---|---------------------|---|
| | | | AND isOmnibus = 'Y' | Account indicate whether the Trading Account Omnibus Account is a house or customer account of the reporting firm | | |
| 90. | Trading Account Omnibus Account Originator Indicator | Question 10i | Conditional, if isTradingAccount = 'Y' AND isOmnibus = 'Y' THEN isOriginator = 'Y' | Indicates reportable Trading Account Omnibus Account originator | Y = Yes N = No | cftcBatch/cftcForm102/relatedAccount/relatedEntity@isOriginator |
| 91. | Trading Account Omnibus Account Optional Fields or Supplemental Fields Reported to LEI Provider | Question 10i | Conditional, if isTradingAccount = 'Y' AND isOmnibus = 'Y' | Indicates that one or more "Optional Fields" or "Supplemental Fields" not included in this question were reported to the CICI Utility (or other CFTC- | Y = Yes N = No | cftcBatch/cftcForm102/relatedAccount/relatedEntity@OptionalOrSuppFieldsSeparatelyReported |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---|----------------------------------|--|--|---------------------|--|
| | | | | approved LEI provider) and are associated with the LEI provided in this submission | | |
| 92. | Trading Account Omnibus Account Entity Type | Question 10i | Yes, entityType = 'LE' | | LE=Legal Entity | cftcBatch/cftcForm102/relatedAccount/relatedEntity@entityType |
| 93. | Trading Account Omnibus Account Originator Name | Question 10i | Conditional. Required if isTradingAccount = 'Y' AND isOmnibus = 'Y' AND OptionalOrSuppFieldsSeparatelyReported = 'N' | Name of omnibus trading account originator | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@legalEntityName |
| 94. | Trading Account Omnibus Account Originator Street Address | Question 10i | Conditional. Required if isTradingAccount = 'Y' AND isOmnibus = 'Y' AND | Street address of omnibus trading account Originator | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@street |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|----------------------------------|--|---|---------------------|--|
| | | | OptionalOrSuppFieldsSeparatelyReported = 'N' | | | |
| 95. | Trading Account Omnibus Account Originator Suite | Question 10i | Conditional. Required if information available AND isTradingAccount = 'Y' AND isOmnibus = 'Y' AND OptionalOrSuppFieldsSeparatelyReported = 'N' | Suite of omnibus trading account Originator | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@suite |
| 96. | Trading Account Omnibus Account Originator City | Question 10i | Conditional. Required if isTradingAccount = 'Y' AND isOmnibus = 'Y' AND OptionalOrSuppFieldsSeparatelyReported = 'N' | City of the omnibus trading account Originator | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@city |
| 97. | Trading Account Omnibus | Question 10i | Conditional. Required if isTradingAccount | ISO 3166-2 geopolitical subdivision code; | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@state |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|----------------------------------|--|---|---------------------|---|
| | Account Originator State | | =‘Y’ AND isOmnibus =‘Y’ AND OptionalOrSuppFieldsSeparatelyReported = ‘N’ | 1-3 alphanumeric characters | | |
| 98. | Trading Account Omnibus Account Originator Country | Question 10i | Conditional. Required if isTradingAccount =‘Y’ AND isOmnibus =‘Y’ AND OptionalOrSuppFieldsSeparatelyReported = ‘N’ | ISO 3166-1 alpha-2 country code | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@country |
| 99. | Trading Account Omnibus Account Originator Zip/Postal Code | Question 10i | Conditional. Required if isTradingAccount =‘Y’ AND isOmnibus =‘Y’ AND OptionalOrSuppFieldsSeparatelyReported = ‘N’ | Zip/Postal code of the omnibus trading account Originator | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@postalCode |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|---|----------------------------------|--|--|---------------------|--|
| 100. | Trading Account Omnibus Account Originator Phone Number | Question 10i | Conditional. Required if isTradingAccount = 'Y' AND isOmnibus = 'Y' AND OptionalOrSuppFieldsSeparatelyReported = 'N' | Phone Number of the omnibus trading account Originator | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@telephone |
| 101. | Trading Account Omnibus Account Originator Contact Last Name | Question 10i | Conditional. Required if isTradingAccount = 'Y' AND isOmnibus = 'Y' AND entityType='LE' AND OptionalOrSuppFieldsSeparatelyReported = 'N' | Surname of the contact for the Originator | | cftcBatch/cftcForm102/relatedAccount/relatedEntity/contact@lastName |
| 102. | Trading Account Omnibus Account Originator Contact First Name | Question 10i | Conditional. Required if isTradingAccount = 'Y' AND isOmnibus = 'Y' AND | First name of the contact for the Originator | | cftcBatch/cftcForm102/relatedAccount/relatedEntity/contact@firstName |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|---|----------------------------------|--|---|---------------------|---|
| | | | entityType='LE' AND OptionalOrSuppFieldsSeparatelyReported = 'N' | | | |
| 103. | Trading Account Omnibus Account Contact Middle Name | Question 10i | Conditional. Required if information available AND isTradingAccount='Y' AND isOmnibus='Y' AND entityType='LE' AND OptionalOrSuppFieldsSeparatelyReported = 'N' | Middle name of the contact for the Originator | | cftcBatch/cftcForm102/relatedAccount/relatedEntity/contact@middleName |
| 104. | Trading Account Omnibus Account Contact Suffix | Question 10i | Conditional. Required if information available AND isTradingAccount='Y' AND isOmnibus='Y' AND | Suffix of the contact for the Originator | | cftcBatch/cftcForm102/relatedAccount/relatedEntity/contact@nameSuffix |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|--|----------------------------------|---|---|---------------------|--|
| | | | entityType='LE' AND OptionalOrSuppFieldsSeparatelyReported = 'N' | | | |
| 105. | Trading Account Omnibus Account Originator Contact Job Title | Question 10i | Conditional. Required if isTradingAccount='Y' AND isOmnibus='Y' AND entityType='LE' AND OptionalOrSuppFieldsSeparatelyReported = 'N' | Job title of the contact person for Originator entity | | cftcBatch/cftcForm102/relatedAccount/relatedEntity/contact@titleOrPosition |
| 106. | Contact Relationship to Trading Account Omnibus Account Originator | Question 10i | Conditional. Required if isTradingAccount='Y' AND isOmnibus='Y' AND entityType='LE' AND OptionalOrSuppFieldsSeparatelyReported = 'N' | Contact relationship to the Originator entity | | cftcBatch/cftcForm102/relatedAccount/relatedEntity/contact@relationship |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|--|----------------------------------|---|---|---------------------|--|
| | | | ported = 'N' | | | |
| 107. | Trading Account Omnibus Account Originator Contact Phone Number | Question 10i | Conditional. Required if isTradingAccount = 'Y' AND isOmnibus = 'Y' AND entityType='LE' AND OptionalOrSuppFieldsSeparatelyReported = 'N' | Phone number of the contact person for the Originator entity | | cftcBatch/cftcForm102/relatedAccount/relatedEntity/contact@telephone |
| 108. | Trading Account Omnibus Account Originator Contact Email Address | Question 10i | Conditional. Required if isTradingAccount = 'Y' AND isOmnibus = 'Y' AND entityType='LE' AND OptionalOrSuppFieldsSeparatelyReported = 'N' | Email address of the contact person for the Originator entity | | cftcBatch/cftcForm102/relatedAccount/relatedEntity/contact@email |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|--|----------------------------------|---|--|---------------------|--|
| 109. | Trading Account Omnibus Account Originator Website | Question 10i | Conditional. Required if information available AND isTradingAccount='Y' AND isOmnibus='Y' AND entityType='LE' AND OptionalOrSuppFieldsSeparatelyReported='N' | URL of the Originator's website | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@website |
| 110. | Trading Account Omnibus Account Originator NFA ID | Question 10i | Conditional. Required if information available AND isTradingAccount='Y' AND isOmnibus='Y' AND OptionalOrSuppFieldsSeparatelyReported='N' | The identification number given to the Originator entity by the National Futures Association | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@NFAIdentifier |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|---------------------------------|--|----------------------------------|--|---|--|--|
| 111. | Trading Account Omnibus Account Originator Legal Entity Identifier (LEI) | Question 10i | Conditional. Required if information available AND isTradingAccount='Y' AND isOmnibus='Y' AND OptionalOrSuppFieldsSeparatelyReported='Y' | The legal entity identifier (LEI) assigned to the Originator entity by the LEI issuer | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@legalEntityIdentifier |
| TRADING ACCOUNT OWNER(S) | | | | | | |
| 112. | Trading Account Owner Indicator | Question 10ii | Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' THEN isOwner='Y' | Indicates reporting special account owner | Y = Yes N = No | cftcBatch/cftcForm102/relatedAccount/relatedEntity@isOwner |
| 113. | Trading Account Owner Type Indicator | Question 10iii | Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' | Indicates whether the special account owner is a legal entity or natural person | LE = Legal Entity NP = Natural Person | cftcBatch/cftcForm102/relatedAccount/relatedEntity@entityType |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|---|---|----------------------------------|---|---|---------------------|---|
| | | | AND isOwner='Y' | | | |
| 114. | Trading Account Owner Optional Fields or Supplemental Fields Reported to LEI Provider | Question 10ii | Conditional, if isTradingAccount='Y' AND isOmnibus='N' AND isOwner='Y' | Indicates that one or more "Optional Fields" or "Supplemental Fields" not included in this question were reported to the CICI Utility (or other CFTC-approved LEI provider) and are associated with the LEI provided in this submission | Y = Yes N = No | cftcBatch/cftcForm102/relatedAccount/relatedEntity@OptionalOrSuppFieldsSeparatelyReported |
| IF TRADING ACCOUNT OWNER IS A LEGAL ENTITY | | | | | | |
| 115. | Trading Account Owner Legal Entity Name | Question 10ii | Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isOwner='Y' | Legal or registered name of the trading account owner | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@legalEntityName |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|---|--|----------------------------------|--|--|---------------------|--|
| | | | AND entityType='LE' AND OptionalOrSuppFieldsSeparatelyReported='N' | | | |
| IF TRADING ACCOUNT OWNER IS A NATURAL PERSON | | | | | | |
| 116. | Trading Account Owner Natural Person Last Name | Question 10ii | Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isOwner='Y' AND entityType='NP' AND OptionalOrSuppFieldsSeparatelyReported='N' | Surname of the natural person trading account owner | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@lastName |
| 117. | Trading Account Owner Natural Person First | Question 10ii | Conditional. Required if isTradingAccount='Y' AND | Given or first in order name of the natural person trading account owner | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@firstName |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|-----------------------------------|----------------------------------|--|---|---------------------|---|
| | Name | | isOmnibus='N' AND isOwner='Y' AND entityType='NP' AND OptionalOrSuppFieldsSeparatelyReported='N' | | | |
| 118. | Trading Account Owner Middle Name | Question 10ii | Conditional. Required if information available AND isTradingAccount='Y' AND isOmnibus='N' AND isOwner='Y' AND entityType='NP' AND OptionalOrSuppFieldsSeparatelyReported='N' | Middle name of the natural person trading account owner | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@middleName |
| 119. | Trading Account Owner Suffix | Question 10ii | Conditional. Required if information | Suffix of the natural person trading account | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@nameSuffix |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|--------------------------------------|----------------------------------|---|---|---------------------|---|
| | | | available AND isTradingAccount='Y' AND isOmnibus='N' AND isOwner='Y' AND entityType='NP' AND OptionalOrSuppFieldsSeparatelyReported='N' | owner | | |
| FOR BOTH LEGAL ENTITIES AND NATURAL PERSONS | | | | | | |
| 120. | Trading Account Owner Street Address | Question 10ii | Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFieldsSeparatelyReported='N' AND | Street address of the trading account owner | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@street |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|-----------------------------|----------------------------------|---|---|---------------------|--|
| | | | FollowOnInformationToCome='N', | | | |
| 121. | Trading Account Owner Suite | Question 10ii | Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFieldsSeparatelyReported='N' AND FollowOnInformationToCome='N', | Suite of the trading account owner | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@suite |
| 122. | Trading Account Owner City | Question 10ii | Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppF | City of the trading account owner | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@city |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|-------------------------------|----------------------------------|---|---|---------------------|--|
| | | | ieldsSeparatelyReported='N' AND FollowOnInformationToCome='N', | | | |
| 123. | Trading Account Owner State | Question 10ii | Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFieldsSeparatelyReported='N' AND FollowOnInformationToCome='N', | ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@state |
| 124. | Trading Account Owner Country | Question 10ii | Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isOwner='Y' | ISO 3166-1 alpha-2 country code | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@country |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|---------------------------------------|----------------------------------|--|---|---------------------|---|
| | | | AND OptionalOrSuppFieldsSeparatelyReported='N' AND FollowOnInformationToCome='N', | | | |
| 125. | Trading Account Owner Zip/Postal Code | Question 10ii | Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFieldsSeparatelyReported='N' AND FollowOnInformationToCome='N', | Zip/Postal code of the trading account owner | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@postalCode |
| 126. | Trading Account Owner Phone Number | Question 10ii | Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' | Phone Number of the trading account owner | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@telephone |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|---|-------------------------------------|----------------------------------|---|---|---------------------|--|
| | | | AND isOwner='Y' AND OptionalOrSuppFieldsSeparatelyReported='N' AND FollowOnInformationToCome='N', | | | |
| IF TRADING ACCOUNT OWNER IS A NATURAL PERSON | | | | | | |
| 127. | Trading Account Owner Email Address | Question 10ii | Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isOwner='Y' AND entityType='NP' AND OptionalOrSuppFieldsSeparatelyReported='N' AND FollowOnInformationToCome='N' | Email address of the trading account owner | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@email |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|---|--|----------------------------------|--|--|---------------------|--|
| | | | , | | | |
| IF TRADING ACCOUNT OWNER IS A LEGAL ENTITY | | | | | | |
| 128. | Trading Account Owner Contact Last Name | Question 10ii | Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFieldsSeparatelyReported='N' AND FollowOnInformationToCome='N', | Surname of the natural person contact for the owner | | cftcBatch/cftcForm102/relatedAccount/relatedEntity/contact@lastName |
| 129. | Trading Account Owner Contact First Name | Question 10ii | Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' | First name of the natural person contact for the owner | | cftcBatch/cftcForm102/relatedAccount/relatedEntity/contact@firstName |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|---|----------------------------------|--|---|---------------------|---|
| | | | AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFieldsSeparatelyReported='N' AND FollowOnInformationToCome='N', | | | |
| 130. | Trading Account Owner Contact Middle Name | Question 10ii | Conditional. Required if information available AND isTradingAccount='Y' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFieldsSeparatelyReported='N' AND FollowOnInform | Middle name of the natural person contact for the owner | | cftcBatch/cftcForm102/relatedAccount/relatedEntity/contact@middleName |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|---|----------------------------------|---|--|---------------------|--|
| | | | ationToCome='N', | | | |
| 131. | Trading Account Owner Contact Suffix | Question 10ii | Conditional. Required if information available AND isTradingAccount='Y' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFieldsSeparatelyReported='N' AND FollowOnInformationToCome='N', | Suffix of the natural person contact for the owner | | cftcBatch/cftcForm102/relatedAccount/relatedEntity/contact@nameSuffix |
| 132. | Trading Account Owner Contact Job Title | Question 10ii | Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' | Job title of the contact person for the ownership entity | | cftcBatch/cftcForm102/relatedAccount/relatedEntity/contact@titleOrPosition |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|---|----------------------------------|--|---|---------------------|---|
| | | | AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFieldsSeparatelyReported='N' AND FollowOnInformationToCome='N', | | | |
| 133. | Contact Relationship to Trading Account Owner | Question 10ii | Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFieldsSeparatelyReported='N' AND FollowOnInformationToCome='N', | Contact relationship to the trading account owner | | cftcBatch/cftcForm102/relatedAccount/relatedEntity/contact@relationship |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|---|----------------------------------|--|--|---------------------|--|
| 134. | Trading Account Owner Contact Phone Number | Question 10ii | Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFieldsSeparatelyReported='N' AND FollowOnInformationToCome='N', | Phone number of the contact person for the ownership entity | | cftcBatch/cftcForm102/relatedAccount/relatedEntity/contact@telephone |
| 135. | Trading Account Owner Contact Email Address | Question 10ii | Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND | Email address of the contact person for the ownership entity | | cftcBatch/cftcForm102/relatedAccount/relatedEntity/contact@email |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|-------------------------------|----------------------------------|---|---|---------------------|--|
| | | | OptionalOrSuppFieldsSeparatelyReported='N' AND FollowOnInformationToCome='N', | | | |
| 136. | Trading Account Owner Website | Question 10ii | Conditional. Required if information available AND isTradingAccount='Y' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFieldsSeparatelyReported='N' AND FollowOnInformationToCome='N', | URL of the owner's website | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@website |
| 137. | Trading Account Owner NFA ID | Question 10ii | Conditional. Required if information available AND isTradingAccount='Y' AND | The identification number given to the ownership entity by the National Futures Association | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@NFAIdentifier |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|---|----------------------------------|---|--|---------------------|--|
| | | | isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFieldsSeparatelyReported='N' AND FollowOnInformationToCome='N', | | | |
| 138. | Trading Account Owner Legal Entity Identifier (LEI) | Question 10ii | Conditional. Required if information available AND isTradingAccount='Y' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFieldsSeparatelyReported='Y' AND FollowOnInformationToCome='N', | The legal entity identifier (LEI) assigned to the ownership entity by the LEI issuer | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@legalEntityIdentifier |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--------------------------------------|---|----------------------------------|--|--|---------------------|---|
| TRADING ACCOUNT CONTROLLER(S) | | | | | | |
| 139. | Trading Account Controller Indicator | Question 10iii | Conditional, if isTradingAccount='Y' AND isOmnibus='N' THEN isController='Y' | Indicates reporting special account Controller | Y = Yes N = No | cftcBatch/cftcForm102/relatedAccount/relatedEntity@isController |
| 140. | Trading Account Controller Entity Type | Question 10iii | Conditional, if isTradingAccount='Y' AND isOmnibus='N' AND isController='Y' THEN entityType='NP' | | NP = Natural Person | cftcBatch/cftcForm102/relatedAccount/relatedEntity@entityType |
| 141. | Trading Account Controller Natural Person Last Name | Question 10iii | Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isController='Y' | Surname of the natural person trading account Controller | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@lastName |
| 142. | Trading Account Controller | Question 10iii | Conditional. Required if isTradingAccount | Given or first in order name of the natural person | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@firstName |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|---|----------------------------------|--|--|---------------------|---|
| | Natural Person First Name | | =‘Y’ AND isOmnibus=‘N’ AND isController=‘Y’ | trading account Controller | | |
| 143. | Trading Account Controller Natural Person Middle Name | Question 10iii | Conditional. Required if information available AND isTradingAccount=‘Y’ AND isOmnibus=‘N’ AND isController=‘Y’ | Middle name of the natural person trading account Controller | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@middleName |
| 144. | Trading Account Controller Natural Person Suffix | Question 10iii | Conditional. Required if information available AND isTradingAccount=‘Y’ AND isOmnibus=‘N’ AND isController=‘Y’ | Suffix of the natural person trading account Controller | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@nameSuffix |
| 145. | Trading Account Controller Street Address | Question 10iii | Conditional. Required if isTradingAccount=‘Y’ AND isOmnibus=‘N’ | Street address of the trading account Controller | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@street |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|----------------------------------|----------------------------------|---|---|---------------------|--|
| | | | AND isController='Y' AND FollowOnInformationToCome='N', | | | |
| 146. | Trading Account Controller Suite | Question 10iii | Conditional. Required if information available AND isTradingAccount='Y' AND isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N', | Suite of the trading account Controller | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@suite |
| 147. | Trading Account Controller City | Question 10iii | Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isController='Y' | City of the trading account Controller | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@city |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|------------------------------------|----------------------------------|---|---|---------------------|--|
| | | | AND FollowOnInformationToCome='N', | | | |
| 148. | Trading Account Controller State | Question 10iii | Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N', | ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@state |
| 149. | Trading Account Controller Country | Question 10iii | Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N', | ISO 3166-1 alpha-2 country code | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@country |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|--|----------------------------------|---|---|---------------------|---|
| 150. | Trading Account Controller Zip/Postal Code | Question 10iii | Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N', | Zip/Postal code of the trading account Controller | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@postalCode |
| 151. | Trading Account Controller Phone Number | Question 10iii | Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N', | Phone Number of the trading account Controller | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@telephone |
| 152. | Trading Account Controller Name of | Question 10iii | Conditional. Required if isTradingAccount='Y' | | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@employerName |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|---|----------------------------------|---|---|---------------------|--|
| | Employer | | AND isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N', | | | |
| 153. | Trading Account Controller Employer NFA ID | Question 10iii | Conditional. Required if information available AND isTradingAccount='Y' AND isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N', | | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@employerNFAIdentifier |
| 154. | Trading Account Controller Employer Legal Entity Identifier | Question 10iii | Conditional. Required if information available AND isTradingAccount='Y' | | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@employerLEI |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|---------------------------------------|----------------------------------|---|---|---------------------|--|
| | | | AND isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N', | | | |
| 155. | Trading Account Controller Job Title | Question 10iii | Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N', | Job title of the contact person for the Controller entity | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@titleOrPosition |
| 156. | Relationship to Trading Account Owner | Question 10iii | Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isController='Y' | Relationship to the trading account owner | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@relationship |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|--|----------------------------------|---|--|---------------------|--|
| | | | AND FollowOnInformationToCome='N', | | | |
| 157. | Trading Account Controller Email Address | Question 10iii | Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N', | Email address of the trading account Controller | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@email |
| 158. | Trading Account Controller NFA ID | Question 10iii | Conditional. Required if information available AND isTradingAccount='Y' AND isOmnibus='N' AND isController='Y' AND FollowOnInform | The identification number given to the Controller entity by the National Futures Association | | cftcBatch/cftcForm102/relatedAccount/relatedEntity@NFAIdentifier |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|---|--|----------------------------------|---|--|---------------------|---|
| | | | ationToCome='N', | | | |
| FOR REPORTING FIRMS THAT ARE FOREIGN BROKERS | | | | | | |
| 159. | U.S. Futures Commission Merchant Indicator | Question 11 | Conditional, if cftcForm102@isFB = 'Y' THEN relatedEntity@isFCM = 'Y' | Indicates U.S. futures commission merchant when reporting firm indicated as foreign broker | Y = Yes N = No | cftcBatch/cftcForm102/relatedEntity@isFCM ¹³ |
| 160. | U.S. Futures Commission Merchant Entity Type | Question 11 | Conditional, if isFCM = 'Y' THEN entityType = 'LE' | | LE = Legal Entity | cftcBatch/cftcForm102/relatedEntity@entityType |
| 161. | U.S. Futures Commission Merchant Legal Entity Name | Question 11 | Conditional, if isFCM = 'Y' | Legal Entity Name of the U.S. Futures Commission Merchant | | cftcBatch/cftcForm102/relatedEntity@legalEntityName |
| 162. | U.S. Futures Commission Merchant | Question 11 | Conditional, if isFCM = 'Y' | Street address of the reportable account U.S. | | cftcBatch/cftcForm102/relatedEntity@street |

¹³ Foreign broker reporting parties may report multiple U.S. futures commission merchants in response to question 11 on the Form 102A. To do so, reporting parties must provide an additional relatedEntity element for each reported U.S. FCM. Each element should contain isFCM = 'Y' and all fields should be completed with respect to each reported U.S. FCM.

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|--|----------------------------------|--|---|---------------------|--|
| | Street Address | | | Futures Commission Merchant | | |
| 163. | U.S. Futures Commission Merchant Suite | Question 11 | Conditional. Required if information available AND isFCM = 'Y' | Suite of the reportable account U.S. Futures Commission Merchant | | cftcBatch/cftcForm102/relatedEntity@suite |
| 164. | U.S. Futures Commission Merchant City | Question 11 | Conditional, if isFCM = 'Y' | City of the reportable account U.S. Futures Commission Merchant | | cftcBatch/cftcForm102/relatedEntity@city |
| 165. | U.S. Futures Commission Merchant State | Question 11 | Conditional, if isFCM = 'Y' | ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters | | cftcBatch/cftcForm102/relatedEntity@state |
| 166. | U.S. Futures Commission Merchant Country | Question 11 | Conditional, if isFCM = 'Y' | ISO 3166-1 alpha-2 country code | | cftcBatch/cftcForm102/relatedEntity@country |
| 167. | U.S. Futures Commission Merchant | Question 11 | Conditional, if isFCM = 'Y' | Zip/Postal code of the reportable account U.S. | | cftcBatch/cftcForm102/relatedEntity@postalCode |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|--|----------------------------------|--|--|---------------------|--|
| | Zip/Postal Code | | | Futures Commission Merchant | | |
| 168. | U.S. Futures Commission Merchant Contact Last Name | Question 11 | Conditional, if isFCM = 'Y' | Surname of the natural person contact for the U.S. Futures Commission Merchant | | cftcBatch/cftcForm102/relatedEntity/contact@lastName |
| 169. | U.S. Futures Commission Merchant Contact First Name | Question 11 | Conditional, if isFCM = 'Y' | First name of the natural person contact for the U.S. Futures Commission Merchant | | cftcBatch/cftcForm102/relatedEntity/contact@firstName |
| 170. | U.S. Futures Commission Merchant Contact Middle Name | Question 11 | Conditional. Required if information available AND isFCM = 'Y' | Middle name of the natural person contact for the U.S. Futures Commission Merchant | | cftcBatch/cftcForm102/relatedEntity/contact@middleName |
| 171. | U.S. Futures Commission Merchant Contact Suffix | Question 11 | Conditional. Required if information available AND isFCM = 'Y' | Suffix of the natural person contact for the U.S. Futures Commission Merchant | | cftcBatch/cftcForm102/relatedEntity/contact@nameSuffix |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|--|----------------------------------|-----------------------------|--|--------------------------------------|---|
| 172. | U.S. Futures Commission Merchant Contact Job Title | Question 11 | Conditional, if isFCM = 'Y' | Job title of the contact person at or related to the U.S. Futures Commission Merchant entity | | cftcBatch/cftcForm102/relatedEntity/contact@titleOrPosition |
| 173. | U.S. Futures Commission Merchant Contact Phone Number | Question 11 | Conditional, if isFCM = 'Y' | Phone number of the contact person at or related to the U.S. Futures Commission Merchant entity | | cftcBatch/cftcForm102/relatedEntity/contact@telephone |
| 174. | U.S. Futures Commission Merchant Contact Email Address | Question 11 | Conditional, if isFCM = 'Y' | Email address of the contact person at or related to the U.S. Futures Commission Merchant entity | | cftcBatch/cftcForm102/relatedEntity/contact@email |
| 175. | Reporting Firm Authorization Indicator | Signature/Authentication | Yes | Indicates if the submitter is duly authorized by the reporting firm to provide the information and representations submitted on this | Y = authorized N = not authorized | cftcBatch/cftcForm102/contact@isAuthorizedRepresentative |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|---------------------------------------|----------------------------------|-----------------|---|---------------------|---|
| | | | | Form 102, and that information and representations are true and correct | | |
| 176. | Authorized Representative Last Name | Signature/Authentication | Yes | Surname of the authorized representative | | cftcBatch/cftcForm102/contact@lastName |
| 177. | Authorized Representative First Name | Signature/Authentication | Yes | Given or first in order name of the authorized representative | | cftcBatch/cftcForm102/contact@firstName |
| 178. | Authorized Representative Middle Name | Signature/Authentication | Yes | Middle name of the authorized representative | | cftcBatch/cftcForm102/contact@middleName |
| 179. | Authorized Representative Name Suffix | Signature/Authentication | Yes | Generation or name suffix of the authorized representative | | cftcBatch/cftcForm102/contact@nameSuffix |
| 180. | Authorized Representative Position | Signature/Authentication | Yes | Job position of the authorized representative | | cftcBatch/cftcForm102/contact@titleOrPosition |
| 181. | Authorized Representative Submitted | Signature/Authentication | Yes | Reporting Firm Name 102 was submitted on | | cftcBatch/cftcForm102@onBehalfOf |

| | Data Element | Form 102A Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|---------------------|----------------------------------|-----------------|---|---------------------|----------------------------------|
| | on behalf of | | | behalf of | | |
| 182. | Date of Submission | Signature/Authentication | Yes | Date [indicated by the authorized representative] that the form was submitted to CFTC | | cftcBatch/cftcForm102@submitDate |

Data Dictionary for Form 102B – Identifying and reporting a volume threshold account¹⁴

Note with regard to give-up reporting and as-of reporting on Form 102B:¹⁵

| | Data Element | Form 102B Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|---------------------|----------------------------------|-----------------|---|---------------------|------------|
|--|---------------------|----------------------------------|-----------------|---|---------------------|------------|

¹⁴ When reviewing the data elements in this Technical Document, reporting parties should also review and consult the OCR Final Rule, including the requirements of the reporting forms attached as an appendix thereto. The reporting forms are the basis for these data elements. Reporting parties should visit this link to view the OCR Final Rule on the Federal Register: <https://www.federalregister.gov/articles/2013/11/18/2013-26789/ownership-and-control-reports-forms-102102s-4040s-and-71>

Visit this link to view a pdf copy of the OCR Final Rule: <http://www.cftc.gov/ucm/groups/public/@lrfederalregister/documents/file/2013-26789a.pdf>

¹⁵ When reporting via Form 102B, reporting parties that receive give-up trades or as-of trades on a delayed basis may account for those trades as of the date the trade was originally executed, or as of the date on which the trade is actually received by the reporting party.

| | Data Element | Form 102B Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-----------|------------------------|----------------------------------|-----------------|---|-------------------------|---------------------------------------|
| 1. | New/Modified Indicator | Question 1 | Yes | <p>Indicates whether the volume threshold account (102B) is:</p> <ul style="list-style-type: none"> • Re-submitted or modified Information for a previously reported volume threshold account • Re-submitted or modified Information for a previously reported volume threshold account | N = New M = Modified | cftcBatch/cftcForm102@informationType |

| | Data Element | Form 102B Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-----------|---|----------------------------------|---|--|--|--|
| 2. | Volume Threshold Trading Account Number | Question 2 | Yes | For each Volume Threshold reported by an entity, provide the trading account number | | cftcBatch/cftcForm102/relatedAccount@accountNumber |
| 3. | Short Code | Question 2 | Conditional. Required if accountCategory = 'VT' | For the Volume Threshold account reported by an entity, provide the related short code | | cftcBatch/cftcForm102/relatedAcctInfo@accountShortCode |
| 4. | Reporting Market | Question 2 | Conditional. Required if accountCategory = 'VT' | Identify the reporting market at which each trading account number appears ¹⁶ | ISO Market Identifier Code (MIC) located at: http://www.iso15022.org/MIC/homepageMIC.htm ¹⁷ | cftcBatch/cftcForm102/relatedAcctInfo@marketIdentifier |

¹⁶ If a trading account number appears at multiple reporting markets, then reporting parties may report multiple reporting markets in response to question 2 on the Form 102B. In this case, parties should report a short code for the trading account in connection with each such reporting market.

¹⁷ See the CFTC website at <http://www.cftc.gov/IndustryOversight/TradingOrganizations/index.htm> for a list of trading organizations regulated by the CFTC.

| | Data Element | Form 102B Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-----------|--------------------------------------|----------------------------------|-----------------|---|---------------------|---|
| 5. | Associated Special Account Indicator | Question 3 | No | If the volume threshold account has been previously identified as a trading account that comprises a special account(s) reported by a clearing member in question 9 in section 102A | Y = Yes N = No | cftcBatch/cftcForm102/relatedAccount@isSpecialAccount |
| 6. | Associated Special Account Number | Question 3 | No | If the volume threshold account has been previously identified as a trading account that comprises a special account(s) reported by a clearing member in question 9 in section 102A | | cftcBatch/cftcForm102/relatedAccount@accountNumber |

| | Data Element | Form 102B Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|---|--|----------------------------------|---|---|---------------------------|------------------------------------|
| VOLUME THRESHOLD ACCOUNT OWNERSHIP AND CONTROL INFORMATION | | | | | | |
| OMNIBUS ACCOUNT INFORMATION | | | | | | |
| 7. | Volume Threshold Account Omnibus Account Indicator | Question 4 | Conditional. Required if accountCategory = 'VT' | Is the Volume Threshold Account an omnibus account, or used to execute trades for an omnibus account | Y = Yes N = No | cftcBatch/cftcForm102@isOmnibus |
| 8. | House or Customer Indicator | Question 4 | Conditional. Required if accountCategory = 'VT' AND isOmnibus = 'Y' | If the reported Volume Threshold Account is being reported as an Omnibus Account indicate whether the Volume Threshold Account Omnibus Account is a house or customer account | H = House C = Customer | cftcBatch/cftcForm102@accountClass |

| | Data Element | Form 102B Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|----------------------------------|---|---|---------------------|--|
| | | | | of the reporting firm | | |
| 9. | Volume Threshold Account Omnibus Account Originator Indicator | Question 4 | Conditional. Required if accountCategory = 'VT' AND isOmnibus = 'Y' THEN isOriginator = 'Y' | Indicates reporting Volume Threshold Account Omnibus Account originator | Y = Yes N = No | cftcBatch/cftcForm102/relatedEntity@isOriginator |
| 10. | Volume Threshold Account Omnibus Account Optional Fields or Supplemental Fields Reported to LEI Provider | Question 4 | Conditional. Required if accountCategory = 'VT' AND isOmnibus = 'Y' | Indicates that one or more "Optional Fields" or "Supplemental Fields" not included in this question were reported to the CICI Utility (or other CFTC-approved LEI provider) and are associated with the LEI provided in this submission | Y = Yes N = No | cftcBatch/cftcForm102/relatedEntity@OptionalOrSuppFieldsSeparatelyReported |

| | Data Element | Form 102B Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|----------------------------------|--|---|---------------------|---|
| 11. | Volume Threshold Account Omnibus Account Entity Type | Question 4 | Yes, entityType='LE' | | LE=Legal Entity | cftcBatch/cftcForm102/relatedEntity@entityType |
| 12. | Volume Threshold Account Omnibus Account Originator Name | Question 4 | Conditional. Required if accountCategory='VT' AND isOmnibus='Y' AND OptionalOrSuppFieldsSeparatelyReported='N' | Legal or registered name of the reportable account Originator | | cftcBatch/cftcForm102/relatedEntity@legalEntityName |
| 13. | Volume Threshold Account Omnibus Account Originator Street Address | Question 4 | Conditional. Required if accountCategory='VT' AND isOmnibus='Y' AND OptionalOrSuppFieldsSeparatelyReported='N' | Street address of the reportable account Originator | | cftcBatch/cftcForm102/relatedEntity@street |

| | Data Element | Form 102B Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---|----------------------------------|--|---|---------------------|---|
| 14. | Volume Threshold Account Omnibus Account Originator Suite | Question 4 | Conditional. Required if information available AND accountCategory = 'VT' AND isOmnibus = 'Y' AND OptionalOrSupp FieldsSeparately Reported = 'N' | Suite of the reportable account Originator | | cftcBatch/cftcForm102/relatedEntity@suite |
| 15. | Volume Threshold Account Omnibus Account Originator City | Question 4 | Conditional. Required if accountCategory = 'VT' AND isOmnibus = 'Y' AND OptionalOrSupp FieldsSeparately Reported = 'N' | City of the reportable account Originator | | cftcBatch/cftcForm102/relatedEntity@city |
| 16. | Volume Threshold Account Omnibus Account | Question 4 | Conditional. Required if accountCategory = 'VT' AND isOmnibus | ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters | | cftcBatch/cftcForm102/relatedEntity@state |

| | Data Element | Form 102B Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---|----------------------------------|---|---|---------------------|--|
| | Originator State | | =‘Y’ AND OptionalOrSupp FieldsSeparately Reported = ‘N’ | | | |
| 17. | Volume Threshold Account Omnibus Account Originator Country | Question 4 | Conditional. Required if accountCategory =‘VT’ AND isOmnibus =‘Y’ AND OptionalOrSupp FieldsSeparately Reported = ‘N’ | ISO 3166-1 alpha-2 country code | | cftcBatch/cftcForm102/relatedEntity@country |
| 18. | Volume Threshold Account Omnibus Account Originator Zip/Postal Code | Question 4 | Conditional. Required if accountCategory =‘VT’ AND isOmnibus =‘Y’ AND OptionalOrSupp FieldsSeparately Reported = ‘N’ | Zip/Postal code of the reportable account Originator | | cftcBatch/cftcForm102/relatedEntity@postalCode |
| 19. | Volume Threshold Account | Question 4 | Conditional. Required if accountCategory | Phone Number of the reportable account | | cftcBatch/cftcForm102/relatedEntity@telephone |

| | Data Element | Form 102B Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|----------------------------------|---|---|---------------------|---|
| | Omnibus Account Originator Phone Number | | =‘VT’ AND isOmnibus =‘Y’ AND OptionalOrSupp FieldsSeparately Reported = ‘N’ | Originator | | |
| 20. | Volume Threshold Account Omnibus Account Originator Contact Last Name | Question 4 | Conditional. Required if accountCategory =‘VT’ AND isOmnibus =‘Y’ AND entityType=‘LE’ AND OptionalOrSupp FieldsSeparately Reported = ‘N’ | Surname of the natural person contact for the Originator | | cftcBatch/cftcForm102/relatedEntity/contact@lastName |
| 21. | Volume Threshold Account Omnibus Account Originator Contact First Name | Question 4 | Conditional. Required if accountCategory =‘VT’ AND isOmnibus =‘Y’ AND entityType=‘LE’ AND OptionalOrSupp | First name of the natural person contact for the Originator | | cftcBatch/cftcForm102/relatedEntity/contact@firstName |

| | Data Element | Form 102B Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|----------------------------------|--|--|---------------------|--|
| | | | FieldsSeparately Reported = 'N' | | | |
| 22. | Volume Threshold Account Omnibus Account Contact Middle Name | Question 4 | Conditional. Required if information available AND accountCategory='VT' AND isOmnibus='Y' AND entityType='LE' AND OptionalOrSupp FieldsSeparately Reported = 'N' | Middle name of the natural person contact for the Originator | | cftcBatch/cftcForm102/relatedEntity/contact@middleName |
| 23. | Volume Threshold Account Omnibus Account Contact Suffix | Question 4 | Conditional. Required if information available AND accountCategory='VT' AND isOmnibus='Y' AND entityType='LE' AND | Suffix of the natural person contact for the Originator | | cftcBatch/cftcForm102/relatedEntity/contact@nameSuffix |

| | Data Element | Form 102B Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---|----------------------------------|--|---|---------------------|---|
| | | | OptionalOrSupp FieldsSeparately Reported = 'N' | | | |
| 24. | Volume Threshold Account Omnibus Account Originator Contact Job Title | Question 4 | Conditional. Required if accountCategory='VT' AND isOmnibus='Y' AND entityType='LE' AND OptionalOrSupp FieldsSeparately Reported = 'N' | Job title of the contact person for the Originator entity | | cftcBatch/cftcForm102/relatedEntity/contact@titleOrPosition |
| 25. | Contact Relationship to Volume Threshold Account Omnibus Account Originator | Question 4 | Conditional. Required if accountCategory='VT' AND isOmnibus='Y' AND entityType='LE' AND OptionalOrSupp FieldsSeparately Reported = 'N' | Contact relationship to the Originator entity | | cftcBatch/cftcForm102/relatedEntity/contact@relationship |

| | Data Element | Form 102B Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---|----------------------------------|--|---|---------------------|---|
| 26. | Volume Threshold Account Omnibus Account Originator Contact Phone Number | Question 4 | Conditional. Required if accountCategory = 'VT' AND isOmnibus = 'Y' AND entityType = 'LE' AND OptionalOrSupp FieldsSeparately Reported = 'N' | Phone number of the contact person for the Originator entity | | cftcBatch/cftcForm102/relatedEntity/contact@telephone |
| 27. | Volume Threshold Account Omnibus Account Originator Contact Email Address | Question 4 | Conditional. Required if accountCategory = 'VT' AND isOmnibus = 'Y' AND entityType = 'LE' AND OptionalOrSupp FieldsSeparately Reported = 'N' | Email address of the contact person for the Originator entity | | cftcBatch/cftcForm102/relatedEntity/contact@email |
| 28. | Volume Threshold Account Omnibus | Question 4 | Conditional. Required if information available AND | URL of the Originator's website | | cftcBatch/cftcForm102/relatedEntity@website |

| | Data Element | Form 102B Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|----------------------------------|--|--|---------------------|---|
| | Account Originator Website | | if accountCategory='VT' AND isOmnibus='Y' AND entityType='LE' AND OptionalOrSuppFieldsSeparatelyReported='N' | | | |
| 29. | Volume Threshold Account Omnibus Account Originator NFA ID | Question 4 | Conditional. Required if information available AND if accountCategory='VT' AND isOmnibus='Y' AND OptionalOrSuppFieldsSeparatelyReported='N' | The identification number given to the Originator entity by the National Futures Association | | cftcBatch/cftcForm102/relatedEntity@NFAIdentifier |
| 30. | Volume Threshold Account Omnibus | Question 4 | Conditional. Required if accountCategory='VT' AND | The legal entity identifier (LEI) assigned to the Originator entity | | cftcBatch/cftcForm102/relatedEntity@legalEntityIdentifier |

| | Data Element | Form 102B Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|--|----------------------------------|--|--|--|--|
| | Account Originator Legal Entity Identifier (LEI) | | isOmnibus = 'Y' AND OptionalOrSuppFieldsSeparatelyReported = 'Y' | by the LEI issuer | | |
| VOLUME THRESHOLD ACCOUNT OWNER(S) | | | | | | |
| 31. | Volume Threshold Account Owner Indicator | Question 5 | Conditional. Required if accountCategory = 'VT' AND isOmnibus = 'N' THEN isOwner = 'Y' | Indicates reportable Volume Threshold account owner | Y = Yes N = No | cftcBatch/cftcForm102/relatedEntity@isOwner |
| 32. | Volume Threshold Account Owner Type Indicator | Question 5 | Conditional. Required if accountCategory = 'VT' AND isOmnibus = 'N' AND isOwner = 'Y' | Indicates whether the Volume Threshold account owner is a legal entity or natural person | LE = Legal Entity NP = Natural Person | cftcBatch/cftcForm102/relatedEntity@entityType |
| 33. | Volume Threshold Account Owner | Question 5 | Conditional. Required if accountCategory = 'VT' | Indicates that one or more "Optional Fields" or "Supplemental | | cftcBatch/cftcForm102/relatedEntity@OptionalOrSuppFieldsSeparatelyReported |

| | Data Element | Form 102B Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|---|----------------------------------|--|---|---------------------|---|
| | Optional Fields or Supplemental Fields Reported to LEI Provider | | AND isOmnibus='N' AND isOwner='Y' | Fields" not included in this question were reported to the CICI Utility (or other CFTC-approved LEI provider) and are associated with the LEI provided in this submission | | |
| IF VOLUME THRESHOLD ACCOUNT OWNER IS A LEGAL ENTITY | | | | | | |
| 34. | Volume Threshold Account Owner Legal Entity Name | Question 5 | Conditional. Required if accountCategory='VT' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSupp FieldsSeparately | Legal or registered name of the reportable account owner | | cftcBatch/cftcForm102/relatedEntity@legalEntityName |

| | Data Element | Form 102B Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|---|----------------------------------|--|---|---------------------|---|
| | | | Reported='N' | | | |
| IF VOLUME THRESHOLD ACCOUNT OWNER IS A NATURAL PERSON | | | | | | |
| 35. | Volume Threshold Account Owner Last Name | Question 5 | Conditional. Required if accountCategory='VT' AND isOmnibus='N' AND isOwner='Y' AND entityType='NP' AND OptionalOrSuppFieldsSeparatelyReported='N' | Surname of the natural person reportable account owner | | cftcBatch/cftcForm102/relatedEntity@lastName |
| 36. | Volume Threshold Account Owner First Name | Question 5 | Conditional. Required if accountCategory='VT' AND isOmnibus='N' AND isOwner='Y' AND | Given or first in order name of the natural person reportable account owner | | cftcBatch/cftcForm102/relatedEntity@firstName |

| | Data Element | Form 102B Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|----------------------------------|---|--|---------------------|--|
| | | | entityType='NP' AND OptionalOrSuppFieldsSeparatelyReported='N' | | | |
| 37. | Volume Threshold Account Owner Middle Name | Question 5 | Conditional. Required if information available AND accountCategory='VT' AND isOmnibus='N' AND isOwner='Y' AND entityType='NP' AND OptionalOrSuppFieldsSeparatelyReported='N' | Middle name of the natural person reportable account owner | | cftcBatch/cftcForm102/relatedEntity@middleName |
| 38. | Volume Threshold Account Owner Suffix | Question 5 | Conditional. Required if information available AND accountCategory='VT' AND | Suffix of the natural person reportable account owner | | cftcBatch/cftcForm102/relatedEntity@nameSuffix |

| | Data Element | Form 102B Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|---|----------------------------------|--|--|---------------------|--|
| | | | isOmnibus='N' AND isOwner='Y' AND entityType='NP' AND OptionalOrSupp FieldsSeparately Reported='N' | | | |
| FOR BOTH LEGAL ENTITIES AND NATURAL PERSONS | | | | | | |
| 39. | Volume Threshold Account Owner Street Address | Question 5 | Conditional. Required if accountCategory ='VT' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSupp FieldsSeparately Reported='N' AND FollowOnInform ationToCome=' N' | Street address of the reportable account owner | | cftcBatch/cftcForm102/relat edEntity@street |

| | Data Element | Form 102B Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--------------------------------------|----------------------------------|---|---|---------------------|---|
| 40. | Volume Threshold Account Owner Suite | Question 5 | Conditional. Required if information available AND accountCategory='VT' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFieldsSeparatelyReported='N' AND FollowOnInformationToCome='N' | Suite of the reportable account owner | | cftcBatch/cftcForm102/relatedEntity@suite |
| 41. | Volume Threshold Account Owner City | Question 5 | Conditional. Required if accountCategory='VT' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSupp | City of the reportable account owner | | cftcBatch/cftcForm102/relatedEntity@city |

| | Data Element | Form 102B Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|----------------------------------|---|---|---------------------|---|
| | | | FieldsSeparately Reported='N' AND FollowOnInformationToCome='N' | | | |
| 42. | Volume Threshold Account Owner State | Question 5 | Conditional. Required if accountCategory='VT' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSupp FieldsSeparately Reported='N' AND FollowOnInformationToCome='N' | ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters | | cftcBatch/cftcForm102/relatedEntity@state |
| 43. | Volume Threshold Account Owner Country | Question 5 | Conditional. Required if accountCategory='VT' AND isOmnibus='N' | ISO 3166-1 alpha-2 country code | | cftcBatch/cftcForm102/relatedEntity@country |

| | Data Element | Form 102B Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---|----------------------------------|--|---|---------------------|--|
| | | | AND isOwner='Y' AND OptionalOrSupp FieldsSeparately Reported='N' AND FollowOnInform ationToCome=' N' | | | |
| 44. | Volume Threshold Account Owner Zip/Postal Code | Question 5 | Conditional. Required if accountCategory ='VT' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSupp FieldsSeparately Reported='N' AND FollowOnInform ationToCome=' N' | Zip/Postal code of the reportable account owner | | cftcBatch/cftcForm102/relat edEntity@postalCode |

| | Data Element | Form 102B Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|--|----------------------------------|--|---|---------------------|---|
| 45. | Volume Threshold Account Owner Phone Number | Question 5 | Conditional. Required if accountCategory='VT' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFieldsSeparatelyReported='N' AND FollowOnInformationToCome='N' | Phone Number of the reportable account owner | | cftcBatch/cftcForm102/relatedEntity@telephone |
| IF VOLUME THRESHOLD ACCOUNT OWNER IS A NATURAL PERSON | | | | | | |
| 46. | Volume Threshold Account Owner Email Address | Question 5 | Conditional. Required if accountCategory='VT' AND isOmnibus='N' AND isOwner='Y' | Email address of the reportable account owner | | cftcBatch/cftcForm102/relatedEntity@email |

| | Data Element | Form 102B Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|---|----------------------------------|---|--|---------------------|--|
| | | | AND entityType='NP' AND OptionalOrSupp FieldsSeparately Reported='N' AND FollowOnInform ationToCome=' N' | | | |
| IF VOLUME THRESHOLD ACCOUNT OWNER IS A LEGAL ENTITY | | | | | | |
| 47. | Volume Threshold Account Owner Contact Last Name | Question 5 | Conditional. Required if accountCategory ='VT' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSupp FieldsSeparately Reported='N' AND | Surname of the natural person contact for the owner | | cftcBatch/cftcForm102/relat edEntity/contact@lastName |

| | Data Element | Form 102B Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|----------------------------------|--|---|---------------------|--|
| | | | FollowOnInformationToCome='N' | | | |
| 48. | Volume Threshold Account Owner Contact First Name | Question 5 | Conditional. Required if accountCategory='VT' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFieldsSeparatelyReported='N' AND FollowOnInformationToCome='N' | First name of the natural person contact for the owner | | cftcBatch/cftcForm102/relatedEntity/contact@firstName |
| 49. | Volume Threshold Account Owner Contact Middle Name | Question 5 | Conditional. Required if information available AND accountCategory='VT' AND | Middle name of the natural person contact for the owner | | cftcBatch/cftcForm102/relatedEntity/contact@middleName |

| | Data Element | Form 102B Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|----------------------------------|--|---|---------------------|--|
| | | | isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSupp FieldsSeparately Reported='N' AND FollowOnInform ationToCome=' N' | | | |
| 50. | Volume Threshold Account Owner Contact Suffix | Question 5 | Conditional. Required if information available AND accountCategory ='VT' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSupp FieldsSeparately | Suffix of the natural person contact for the owner | | cftcBatch/cftcForm102/relat edEntity/contact@nameSuffi x |

| | Data Element | Form 102B Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|----------------------------------|--|---|---------------------|---|
| | | | Reported='N' AND FollowOnInformationToCome='N' | | | |
| 51. | Volume Threshold Account Owner Contact Job Title | Question 5 | Conditional. Required if accountCategory='VT' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFieldsSeparatelyReported='N' AND FollowOnInformationToCome='N' | Job title of the contact person at for the ownership entity | | cftcBatch/cftcForm102/relatedEntity/contact@titleOrPosition |
| 52. | Contact Relationship to Volume Threshold Account | Question 5 | Conditional. Required if accountCategory='VT' AND | Contact relationship to the ownership entity | | cftcBatch/cftcForm102/relatedEntity/contact@relationship |

| | Data Element | Form 102B Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---|----------------------------------|---|--|---------------------|---|
| | Owner | | isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSupp FieldsSeparately Reported='N' AND FollowOnInform ationToCome=' N' | | | |
| 53. | Volume Threshold Account Owner Contact Phone Number | Question 5 | Conditional. Required if accountCategory ='VT' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSupp FieldsSeparately Reported='N' AND | Phone number of the contact person for the ownership entity | | cftcBatch/cftcForm102/relat edEntity/contact@telephone |

| | Data Element | Form 102B Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|----------------------------------|--|--|---------------------|---|
| | | | FollowOnInformationToCome='N' | | | |
| 54. | Volume Threshold Account Owner Contact Email Address | Question 5 | Conditional. Required if accountCategory='VT' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFieldsSeparatelyReported='N' AND FollowOnInformationToCome='N' | Email address of the contact person for the ownership entity | | cftcBatch/cftcForm102/relatedEntity/contact@email |
| 55. | Volume Threshold Account Owner Website | Question 5 | Conditional. Required if information available AND, if accountCategory='VT' | URL of the owner's website | | cftcBatch/cftcForm102/relatedEntity@website |

| | Data Element | Form 102B Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---------------------------------------|----------------------------------|--|---|---------------------|---|
| | | | AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSupp FieldsSeparately Reported='N' AND FollowOnInform ationToCome='N' | | | |
| 56. | Volume Threshold Account Owner NFA ID | Question 5 | Conditional. Required if information available AND accountCategory='VT' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSupp FieldsSeparately Reported='N' AND FollowOnInform | The identification number given to the ownership entity by the National Futures Association | | cftcBatch/cftcForm102/relatedEntity@NFAIdentifier |

| | Data Element | Form 102B Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|---|--|----------------------------------|--|--|---------------------|---|
| | | | ationToCome='N' | | | |
| 57. | Volume Threshold Account Owner Legal Entity Identifier (LEI) | Question 5 | Conditional. Required if information available AND accountCategory='VT' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFieldsSeparatelyReported='Y' AND FollowOnInformationToCome='N' | The legal entity identifier (LEI) assigned to the ownership entity by the LEI issuer | | cftcBatch/cftcForm102/relatedEntity@legalEntityIdentifier |
| VOLUME THRESHOLD ACCOUNT CONTROLLER(S) | | | | | | |
| 58. | Volume Threshold Account Controller Indicator | Question 6 | Conditional. Required if accountCategory='VT' AND | Indicates reporting Volume Threshold account | Y = Yes N = No | cftcBatch/cftcForm102/relatedEntity@isController |

| | Data Element | Form 102B Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---|----------------------------------|---|--|---------------------|--|
| | | | isOmnibus='N' THEN isController='Y' | Controller | | |
| 59. | Volume Threshold Account Controller Entity Type | Question 6 | Conditional. Required if accountCategory='VT' AND isOmnibus='N' AND isController='Y' THEN entityType='NP' | | NP = Natural Person | cftcBatch/cftcForm102/relatedEntity@entityType |
| 60. | Volume Threshold Account Controller Natural Person Last Name | Question 6 | Conditional. Required if accountCategory='VT' AND isOmnibus='N' AND isController='Y' | Surname of the natural person reportable account Controller | | cftcBatch/cftcForm102/relatedEntity@lastName |
| 61. | Volume Threshold Account Controller Natural Person First Name | Question 6 | Conditional. Required if accountCategory='VT' AND isOmnibus='N' AND | Given or first in order name of the natural person reportable account Controller | | cftcBatch/cftcForm102/relatedEntity@firstName |

| | Data Element | Form 102B Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|----------------------------------|--|---|---------------------|--|
| | | | isController='Y' | | | |
| 62. | Volume Threshold Account Controller Natural Person Middle Name | Question 6 | Conditional. Required if information available AND accountCategory='VT' AND isOmnibus='N' AND isController='Y' | Middle name of the natural person reportable account Controller | | cftcBatch/cftcForm102/relatedEntity@middleName |
| 63. | Volume Threshold Account Controller Natural Person Suffix | Question 6 | Conditional. Required if information available AND accountCategory='VT' AND isOmnibus='N' AND isController='Y' | Suffix of the natural person reportable account Controller | | cftcBatch/cftcForm102/relatedEntity@nameSuffix |
| 64. | Volume Threshold Account Controller Street | Question 6 | Conditional. Required if accountCategory='VT' AND | Street address of the reportable account Controller | | cftcBatch/cftcForm102/relatedEntity@street |

| | Data Element | Form 102B Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---|----------------------------------|--|---|---------------------|---|
| | Address | | isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N' | | | |
| 65. | Volume Threshold Account Controller Suite | Question 6 | Conditional (not required), if accountCategory='VT' AND isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N' | Suite of the reportable account Controller | | cftcBatch/cftcForm102/relatedEntity@suite |
| 66. | Volume Threshold Account Controller City | Question 6 | Conditional. Required if accountCategory='VT' AND isOmnibus='N' AND isController='Y' AND | City of the reportable account Controller | | cftcBatch/cftcForm102/relatedEntity@city |

| | Data Element | Form 102B Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---|----------------------------------|--|---|---------------------|---|
| | | | FollowOnInformationToCome='N' | | | |
| 67. | Volume Threshold Account Controller State | Question 6 | Conditional. Required if accountCategory='VT' AND isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N' | ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters | | cftcBatch/cftcForm102/relatedEntity@state |
| 68. | Volume Threshold Account Controller Country | Question 6 | Conditional. Required if accountCategory='VT' AND isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N' | ISO 3166-1 alpha-2 country code | | cftcBatch/cftcForm102/relatedEntity@country |

| | Data Element | Form 102B Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---|----------------------------------|--|--|---------------------|--|
| 69. | Volume Threshold Account Controller Zip/Postal Code | Question 6 | Conditional. Required if accountCategory ='VT' AND isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N' | Zip/Postal code of the reportable account Controller | | cftcBatch/cftcForm102/relatedEntity@postalCode |
| 70. | Volume Threshold Account Controller Phone Number | Question 6 | Conditional. Required if accountCategory ='VT' AND isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N' | Phone Number of the reportable account Controller | | cftcBatch/cftcForm102/relatedEntity@telephone |
| 71. | Volume Threshold Account Controller | Question 6 | Conditional. Required if accountCategory ='VT' | | | cftcBatch/cftcForm102/relatedEntity@employerName |

| | Data Element | Form 102B Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---|----------------------------------|---|---|---------------------|---|
| | Name of Employer | | AND isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N' | | | |
| 72. | Volume Threshold Account Controller Employer NFA ID | Question 6 | Conditional. Required if information available AND accountCategory='VT' AND isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N' | | | cftcBatch/cftcForm102/relatedEntity@employerNFAIdentifier |
| 73. | Volume Threshold Account Controller Employer Legal Entity | Question 6 | Conditional. Required if information available AND accountCategory='VT' | | | cftcBatch/cftcForm102/relatedEntity@employerLEI |

| | Data Element | Form 102B Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|----------------------------------|--|---|---------------------|---|
| | Identifier | | AND isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N' | | | |
| 74. | Volume Threshold Account Controller Job Title | Question 6 | Conditional. Required if accountCategory='VT' AND isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N' | Job title of the contact person for the Controller entity | | cftcBatch/cftcForm102/relatedEntity@titleOrPosition |
| 75. | Relationship to Volume Threshold Account Owner | Question 6 | Conditional. Required if accountCategory='VT' AND isOmnibus='N' AND isController='Y' | Contact relationship to trading account owner | | cftcBatch/cftcForm102/relatedEntity@relationship |

| | Data Element | Form 102B Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---|----------------------------------|---|--|---------------------|---|
| | | | AND FollowOnInformationToCome='N' | | | |
| 76. | Volume Threshold Account Controller Email Address | Question 6 | Conditional. Required if accountCategory='VT' AND isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N' | Email address of the reportable account Controller | | cftcBatch/cftcForm102/relatedEntity@email |
| 77. | Volume Threshold Account Controller NFA ID | Question 6 | Conditional. Required if information available AND accountCategory='VT' AND isOmnibus='N' AND isController='Y' AND FollowOnInform | The identification number given to the Controller entity by the National Futures Association | | cftcBatch/cftcForm102/relatedEntity@NFAIdentifier |

| | Data Element | Form 102B Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|----------------------------------|-----------------|--|--------------------------------------|--|
| | | | ationToCome='N' | | | |
| 78. | Reporting Firm Authorization Indicator | Signature/Authentication | Yes | Indicates if the submitter is duly authorized by the reporting firm to provide the information and representations submitted on this Form 102, and that information and representations are true and correct | Y = authorized N = not authorized | cftcBatch/cftcForm102/contact@isAuthorizedRepresentative |
| 79. | Authorized Representative Last Name | Signature/Authentication | Yes | Surname of the authorized representative | | cftcBatch/cftcForm102/contact@lastName |
| 80. | Authorized Representative First Name | Signature/Authentication | Yes | Given or first in order name of the authorized representative | | cftcBatch/cftcForm102/contact@firstName |
| 81. | Authorized Representative Middle | Signature/Authentication | Yes | Middle name of the authorized representative | | cftcBatch/cftcForm102/contact@middleName |

| | Data Element | Form 102B Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|----------------------------------|-----------------|---|---------------------|---|
| | Name | | | | | |
| 82. | Authorized Representative Name Suffix | Signature/Authentication | Yes | Generation or name suffix of the authorized representative | | cftcBatch/cftcForm102/contact@nameSuffix |
| 83. | Authorized Representative Position | Signature/Authentication | Yes | Job position of the authorized representative | | cftcBatch/cftcForm102/contact@titleOrPosition |
| 84. | Authorized Representative Submitted on behalf of | Signature/Authentication | Yes | Reporting Firm Name 102 was submitted on behalf of | | cftcBatch/cftcForm102@onBehalfOf |
| 85. | Date of Submission | Signature/Authentication | Yes | Date [indicated by the authorized representative] that the form was submitted to CFTC | | cftcBatch/cftcForm102@submitDate |

Data Dictionary for Form 102S – Identifying and reporting a consolidated account¹⁸

| | Data Element | Form 102S Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-----------|------------------------|----------------------------------|-----------------|--|-------------------------|---------------------------------------|
| 1. | New/Modified Indicator | Question 1 | Yes | Indicates whether the consolidated account (102S) is: <ul style="list-style-type: none"> • Counterparty or customer reported for the first time • Re-submitted or modified Information for a previously reported counterpa | N = New M = Modified | cftcBatch/cftcForm102@informationType |

¹⁸ When reviewing the data elements in this Technical Document, reporting parties should also review and consult the OCR Final Rule, including the requirements of the reporting forms attached as an appendix thereto. The reporting forms are the basis for these data elements. Reporting parties should visit this link to view the OCR Final Rule on the Federal Register: <https://www.federalregister.gov/articles/2013/11/18/2013-26789/ownership-and-control-reports-forms-102102s-4040s-and-71>

Visit this link to view a pdf copy of the OCR Final Rule: <http://www.cftc.gov/ucm/groups/public/@lrfederalregister/documents/file/2013-26789a.pdf>

| | Data Element | Form 102S Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-----------|------------------------------|----------------------------------|-----------------|---|---------------------|--|
| | | | | entity or customer | | |
| 2. | 102S Counterparty Identifier | Question 2 | Yes | A unique identifier for each reporting entity or counterparty/customer as assigned by the reporting entity | | cftcBatch/cftcForm102@accountNumber |
| 3. | Special Account Indicator | Question 2 | Yes | If the reporting entity currently identifies a counterparty via Section 102A of a Form 102, the identifier used on Section 102A of the Form 102 may also be used for the 102S identifier, as long as the same legal entity is referenced. Indicates if the same identifier is | Y = Yes N = No | cftcBatch/cftcForm102@isSpecialAccount |

| | Data Element | Form 102S Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-----------|--|----------------------------------|--|---|---------------------------|------------------------------------|
| | | | | being so used. | | |
| 4. | House or Customer Indicator | Question 3i | Yes | Consolidated account type | H = House C = Customer | cftcBatch/cftcForm102@accountClass |
| 5. | Consolidated Account Omnibus Account Indicator | Question 3ii | Yes | Is the reportable consolidated account an omnibus account, or used to execute trades for an omnibus account | Y = Yes N = No | cftcBatch/cftcForm102@isOmnibus |
| 6. | House or Customer Indicator | Question 3ii | Conditional. Required if isOmnibus = 'Y' | If the reported Consolidated Account is being reported as an Omnibus Account indicate whether the Volume Threshold Account Omnibus Account is a house or customer account | H = House C = Customer | cftcBatch/cftcForm102@accountClass |

| | Data Element | Form 102S Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|---|--|----------------------------------|--|--|---------------------|--|
| | | | | of the reporting firm | | |
| CONSOLIDATED ACCOUNT OWNERSHIP AND CONTROL INFORMATION | | | | | | |
| OMNIBUS ACCOUNT INFORMATION | | | | | | |
| 7. | Consolidated Account Omnibus Account Originator Indicator | Question 3ii | Conditional. Required if isOmnibus = 'Y' THEN isOriginator = 'Y' | Indicates reporting Consolidated Account Omnibus Account originator | Y = Yes N = No | cftcBatch/cftcForm102/relatedEntity@isOriginator |
| 8. | Consolidated Account Omnibus Account Optional Fields or Supplemental Fields Reported to LEI Provider | Question 3ii | Conditional. Required if isOmnibus = 'Y' | Indicates that one or more "Optional Fields" or "Supplemental Fields" not included in this question were reported to the CICI Utility (or other CFTC-approved LEI provider) and are associated with the LEI provided | Y = Yes N = No | cftcBatch/cftcForm102/relatedEntity@OptionalOrSuppFieldsSeparatelyReported |

| | Data Element | Form 102S Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|----------------------------------|---|---|---------------------|---|
| | | | | in this submission | | |
| 9. | Consolidated Account Omnibus Account Entity Type | Question 3ii | Yes, entityType='LE' | | LE=Legal Entity | cftcBatch/cftcForm102/relatedEntity@entityType |
| 10. | Consolidated Account Omnibus Account Originator Name | Question 3ii | Conditional. Required if isOmnibus = 'Y' AND OptionalOrSupp FieldsSeparately Reported = 'N' | Name of the reportable account Originator | | cftcBatch/cftcForm102/relatedEntity@legalEntityName |
| 11. | Consolidated Account Omnibus Account Originator Street Address | Question 3ii | Conditional. Required if isOmnibus = 'Y' AND OptionalOrSupp FieldsSeparately Reported = 'N' | Street address of the reportable account Originator | | cftcBatch/cftcForm102/relatedEntity@street |
| 12. | Consolidated Account Omnibus Account | Question 3ii | Conditional. Required if information available | Suite of the reportable account Originator | | cftcBatch/cftcForm102/relatedEntity@suite |

| | Data Element | Form 102S Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---|----------------------------------|--|---|---------------------|---|
| | Originator Suite | | ANDisOmnibus = 'Y' AND OptionalOrSupp FieldsSeparately Reported = 'N' | | | |
| 13. | Consolidated Account Omnibus Account Originator City | Question 3ii | Conditional. Required if isOmnibus = 'Y' AND OptionalOrSupp FieldsSeparately Reported = 'N' | City of the reportable account Originator | | cftcBatch/cftcForm102/relatedEntity@city |
| 14. | Consolidated Account Omnibus Account Originator State | Question 3ii | Conditional. Required if isOmnibus = 'Y' AND OptionalOrSupp FieldsSeparately Reported = 'N' | ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters | | cftcBatch/cftcForm102/relatedEntity@state |
| 15. | Consolidated Account Omnibus Account Originator Country | Question 3ii | Conditional. Required if isOmnibus = 'Y' AND OptionalOrSupp FieldsSeparately Reported = 'N' | ISO 3166-1 alpha-2 country code | | cftcBatch/cftcForm102/relatedEntity@country |

| | Data Element | Form 102S Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---|----------------------------------|--|---|---------------------|---|
| 16. | Consolidated Account Omnibus Account Originator Zip/Postal Code | Question 3ii | Conditional. Required if isOmnibus = 'Y' AND OptionalOrSupp FieldsSeparately Reported = 'N' | Zip/Postal code of the reportable account Originator | | cftcBatch/cftcForm102/relatedEntity@postalCode |
| 17. | Consolidated Account Omnibus Account Originator Phone Number | Question 3ii | Conditional. Required if isOmnibus = 'Y' AND OptionalOrSupp FieldsSeparately Reported = 'N' | Phone Number of the reportable account Originator | | cftcBatch/cftcForm102/relatedEntity@telephone |
| 18. | Consolidated Account Omnibus Account Originator Contact Last Name | Question 3ii | Conditional. Required if isOmnibus = 'Y' AND entityType='LE' AND OptionalOrSupp FieldsSeparately Reported = 'N' | Surname of the natural person contact for the Originator | | cftcBatch/cftcForm102/relatedEntity/contact@lastName |
| 19. | Consolidated Account Omnibus Account Originator | Question 3ii | Conditional. Required if isOmnibus = 'Y' AND entityType='LE' | First name of the natural person contact for the Originator | | cftcBatch/cftcForm102/relatedEntity/contact@firstName |

| | Data Element | Form 102S Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|----------------------------------|---|--|---------------------|--|
| | Contact First Name | | AND OptionalOrSupp FieldsSeparately Reported = 'N' | | | |
| 20. | Consolidated Account Omnibus Account Contact Middle Name | Question 3ii | Conditional. Required if information available ANDisOmnibus = 'Y' AND entityType='LE' AND OptionalOrSupp FieldsSeparately Reported = 'N' | Middle name of the natural person contact for the Originator | | cftcBatch/cftcForm102/relatedEntity/contact@middleName |
| 21. | Consolidated Account Omnibus Account Contact Suffix | Question 3ii | Conditional. Required if information available AND isOmnibus = 'Y' AND entityType='LE' AND OptionalOrSupp FieldsSeparately Reported = 'N' | Suffix of the natural person contact for the Originator | | cftcBatch/cftcForm102/relatedEntity/contact@nameSuffix |

| | Data Element | Form 102S Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|----------------------------------|--|--|---------------------|---|
| 22. | Consolidated Account Omnibus Account Originator Contact Job Title | Question 3ii | Conditional. Required if isOmnibus = 'Y' AND entityType='LE' AND OptionalOrSupp FieldsSeparately Reported = 'N' | Job title of the contact person for the Originator entity | | cftcBatch/cftcForm102/relatedEntity/contact@titleOrPosition |
| 23. | Contact Relationship to Consolidated Account Omnibus Account Originator | Question 3ii | Conditional, ifConditional. Required if isOmnibus = 'Y' AND entityType='LE' AND OptionalOrSupp FieldsSeparately Reported = 'N' | Contact relationship to the Originator entity | | cftcBatch/cftcForm102/relatedEntity/contact@relationship |
| 24. | Consolidated Account Omnibus Account Originator Contact Phone Number | Question 3ii | Conditional. Required if isOmnibus = 'Y' AND entityType='LE' AND OptionalOrSupp FieldsSeparately Reported = 'N' | Phone number of the contact person for the Originator entity | | cftcBatch/cftcForm102/relatedEntity/contact@telephone |

| | Data Element | Form 102S Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-----|---|----------------------------------|---|--|---------------------|---|
| 25. | Consolidated Account Omnibus Account Originator Contact Email Address | Question 3ii | Conditional. Required if isOmnibus = 'Y' AND entityType='LE' AND OptionalOrSupp FieldsSeparately Reported = 'N' | Email address of the contact person for the Originator entity | | cftcBatch/cftcForm102/relatedEntity/contact@email |
| 26. | Consolidated Account Omnibus Account Originator Website | Question 3ii | Conditional. Required if information available AND isOmnibus = 'Y' AND entityType='LE' AND OptionalOrSupp FieldsSeparately Reported='N' | URL of the Originator's website | | cftcBatch/cftcForm102/relatedEntity@website |
| 27. | Consolidated Account Omnibus Account Originator NFA ID | Question 3ii | Conditional. Required if information available AND isOmnibus = 'Y' AND OptionalOrSupp FieldsSeparately | The identification number given to the Originator entity by the National Futures Association | | cftcBatch/cftcForm102/relatedEntity@NFAIdentifier |

| | Data Element | Form 102S Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--------------------------------------|---|----------------------------------|---|---|--|--|
| | | | Reported='N' | | | |
| 28. | Consolidated Account Omnibus Account Originator Legal Entity Identifier (LEI) | Question 3ii | Conditional. Required if information available AND isOmnibus='Y' AND OptionalOrSuppFieldsSeparatelyReported='Y' | The legal entity identifier (LEI) assigned to the Originator entity by the LEI issuer | | cftcBatch/cftcForm102/relatedEntity@legalEntityIdentifier |
| CONSOLIDATED ACCOUNT OWNER(S) | | | | | | |
| 29. | Consolidated Account Owner Indicator | Question 3iii | Conditional. Required if isOmnibus='N' THEN isOwner='Y' | Indicates reportable Consolidated account owner | Y = Yes N = No | cftcBatch/cftcForm102/relatedEntity@isOwner |
| 30. | Consolidated Account Owner Type Indicator | Question 3iii | Conditional. Required if isOmnibus='N' AND isOwner='Y' | Indicates whether the Consolidated account owner is a legal entity or natural person | LE = Legal Entity NP = Natural Person | cftcBatch/cftcForm102/relatedEntity@entityType |
| 31. | Consolidated Account Owner | Question 3iii | Conditional. Required if isOmnibus='N' | Indicates that one or more "Optional Fields" | Y = Yes N = No | cftcBatch/cftcForm102/relatedEntity@OptionalOrSuppFieldsSeparatelyReported |

| | Data Element | Form 102S Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|---|----------------------------------|---|--|---------------------|---|
| | Optional Fields or Supplemental Fields Reported to LEI Provider | | AND isOwner='Y' | or "Supplemental Fields" not included in this question were reported to the CICI Utility (or other CFTC-approved LEI provider) and are associated with the LEI provided in this submission | | |
| IF CONSOLIDATED ACCOUNT OWNER IS A LEGAL ENTITY | | | | | | |
| 32. | Consolidated Account Owner Legal Entity Name | Question 3iii | Conditional. Required if isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSupp FieldsSeparately Reported='N' | Legal or registered name of the reportable account owner | | cftcBatch/cftcForm102/relatedEntity@legalEntityName |

| | Data Element | Form 102S Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|---------------------------------------|----------------------------------|---|---|---------------------|--|
| IF CONSOLIDATED ACCOUNT OWNER IS A NATURAL PERSON | | | | | | |
| 33. | Consolidated Account Owner Last Name | Question 3iii | Conditional. Required if isOmnibus='N' AND isOwner='Y' AND entityType='NP' AND OptionalOrSupp FieldsSeparately Reported='N' | Surname of the natural person reportable account owner | | cftcBatch/cftcForm102/relatedEntity@lastName |
| 34. | Consolidated Account Owner First Name | Question 3iii | Conditional. Required if isOmnibus='N' AND isOwner='Y' AND entityType='NP' AND OptionalOrSupp FieldsSeparately Reported='N' | Given or first in order name of the natural person reportable account owner | | cftcBatch/cftcForm102/relatedEntity@firstName |
| 35. | Consolidated Account Owner | Question 3iii | Conditional. Required if information | Middle name of the natural person reportable | | cftcBatch/cftcForm102/relatedEntity@middleName |

| | Data Element | Form 102S Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|-----------------------------------|----------------------------------|---|---|---------------------|--|
| | Middle Name | | available AND isOmnibus='N' AND isOwner='Y' AND entityType='NP' AND OptionalOrSupp FieldsSeparately Reported='N' | account owner | | |
| 36. | Consolidated Account Owner Suffix | Question 3iii | Conditional. Required if information available AND isOmnibus='N' AND isOwner='Y' AND entityType='NP' AND OptionalOrSupp FieldsSeparately Reported='N' | Suffix of the natural person reportable account owner | | cftcBatch/cftcForm102/relatedEntity@nameSuffix |
| FOR BOTH LEGAL ENTITIES AND NATURAL PERSONS | | | | | | |
| 37. | Consolidated Account | Question 3iii | Conditional. Required if | Street address of the reportable | | cftcBatch/cftcForm102/relatedEntity@street |

| | Data Element | Form 102S Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|----------------------------------|----------------------------------|---|---|---------------------|---|
| | Owner Street Address | | isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFieldsSeparatelyReported='N' | account owner | | |
| 38. | Consolidated Account Owner Suite | Question 3iii | Conditional. Required if isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFieldsSeparatelyReported='N' | Suite of the reportable account owner | | cftcBatch/cftcForm102/relatedEntity@suite |
| 39. | Consolidated Account Owner City | Question 3iii | Conditional. Required if isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFieldsSeparatelyReported='N' | City of the reportable account owner | | cftcBatch/cftcForm102/relatedEntity@city |
| 40. | Consolidated Account Owner State | Question 3iii | Conditional. Required if isOmnibus='N' | ISO 3166-2 geopolitical subdivision code; | | cftcBatch/cftcForm102/relatedEntity@state |

| | Data Element | Form 102S Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|----------------------------------|---|---|---------------------|--|
| | | | AND isOwner='Y' AND OptionalOrSupp FieldsSeparately Reported='N' | 1-3 alphanumeric characters | | |
| 41. | Consolidated Account Owner Country | Question 3iii | Conditional. Required if isOmnibus='N' AND isOwner='Y' AND OptionalOrSupp FieldsSeparately Reported='N' | ISO 3166-1 alpha-2 country code | | cftcBatch/cftcForm102/ relatedAccount/relatedEntity @country |
| 42. | Consolidated Account Owner Zip/Postal Code | Question 3iii | Conditional. Required if isOmnibus='N' AND isOwner='Y' AND OptionalOrSupp FieldsSeparately Reported='N' | Zip/Postal code of the reportable account owner | | cftcBatch/cftcForm102/relat edEntity@postalCode |
| 43. | Consolidated Account Owner Phone | Question 3iii | Conditional. Required if isOmnibus='N' AND | Phone Number of the reportable account owner | | cftcBatch/cftcForm102/relat edEntity@telephone |

| | Data Element | Form 102S Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|--|----------------------------------|---|---|---------------------|--|
| | Number | | isOwner='Y' AND OptionalOrSupp FieldsSeparately Reported='N' | | | |
| IF CONSOLIDATED ACCOUNT OWNER IS A NATURAL PERSON | | | | | | |
| 44. | Consolidated Account Owner Email Address | Question 3iii | Conditional. Required if isOmnibus='N' AND isOwner='Y' AND entityType='NP' AND OptionalOrSupp FieldsSeparately Reported='N' | Email address of the reportable account owner | | cftcBatch/cftcForm102/relatedEntity@email |
| IF CONSOLIDATED ACCOUNT OWNER IS A LEGAL ENTITY | | | | | | |
| 45. | Consolidated Account Owner Contact Last Name | Question 3iii | Conditional. Required if isOmnibus='N' AND isOwner='Y' AND | Surname of the contact person for the owner | | cftcBatch/cftcForm102/relatedEntity/contact@lastName |

| | Data Element | Form 102S Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|----------------------------------|---|---|---------------------|--|
| | | | entityType='LE' AND OptionalOrSupp FieldsSeparately Reported='N' | | | |
| 46. | Consolidated Account Owner Contact First Name | Question 3iii | Conditional. Required if isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSupp FieldsSeparately Reported='N' | First name of the contact person for the owner | | cftcBatch/cftcForm102/relatedEntity/contact@firstName |
| 47. | Consolidated Account Owner Contact Middle Name | Question 3iii | Conditional. Required if information available AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSupp FieldsSeparately | Middle name of the contact person for the owner | | cftcBatch/cftcForm102/relatedEntity/contact@middleName |

| | Data Element | Form 102S Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|----------------------------------|---|--|---------------------|---|
| | | | Reported='N' | | | |
| 48. | Consolidated Account Owner Contact Suffix | Question 3iii | Conditional. Required if information available AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSupp FieldsSeparately Reported='N' | Suffix of the contact person for the owner | | cftcBatch/cftcForm102/relatedEntity/contact@nameSuffix |
| 49. | Consolidated Account Owner Contact Job Title | Question 3iii | Conditional. Required if isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSupp FieldsSeparately Reported='N' | Job title of the contact person for the ownership entity | | cftcBatch/cftcForm102/relatedEntity/contact@titleOrPosition |

| | Data Element | Form 102S Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|----------------------------------|---|--|---------------------|--|
| 50. | Contact Relationship to Consolidated Account Owner | Question 3iii | Conditional. Required if isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSupp FieldsSeparately Reported='N' | Contact relationship to the ownership entity | | cftcBatch/cftcForm102/relatedEntity/contact@relationship |
| 51. | Consolidated Account Owner Contact Phone Number | Question 3iii | Conditional. Required if isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSupp FieldsSeparately Reported='N' | Phone number of the contact person for the ownership entity | | cftcBatch/cftcForm102/relatedEntity/contact@telephone |
| 52. | Consolidated Account Owner Contact Email Address | Question 3iii | Conditional. Required if isOmnibus='N' AND isOwner='Y' AND | Email address of the contact person for the ownership entity | | cftcBatch/cftcForm102/relatedEntity/contact@email |

| | Data Element | Form 102S Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|------------------------------------|----------------------------------|--|---|---------------------|---|
| | | | entityType='LE' AND OptionalOrSuppFieldsSeparatelyReported='N' | | | |
| 53. | Consolidated Account Owner Website | Question 3iii | Conditional. Required if information available AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFieldsSeparatelyReported='N' | URL of the owner's website | | cftcBatch/cftcForm102/relatedEntity@website |
| 54. | Consolidated Account Owner NFA ID | Question 3iii | Conditional. Required if information available AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFieldsSeparatelyReported='N' | The identification number given to the ownership entity by the National Futures Association | | cftcBatch/cftcForm102/relatedEntity@NFAIdentifier |

| | Data Element | Form 102S Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|---|--|----------------------------------|---|--|--|--|
| 55. | Consolidated Account Owner Legal Entity Identifier (LEI) | Question 3iii | Conditional. Required if information available AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFieldsSeparatelyReported='Y' | The legal entity identifier (LEI) assigned to the ownership entity by the LEI issuer | | cftcBatch/cftcForm102/relatedEntity@legalEntityIdentifier |
| CONSOLIDATED ACCOUNT CONTROLLER(S) | | | | | | |
| 56. | Consolidated Account Controller Indicator | Question 3iv | Conditional. Required if isOmnibus='N' THEN isController='Y' | Indicates reporting Consolidated account Controller | Y = Yes N = No | cftcBatch/cftcForm102/relatedEntity@isController |
| 57. | Consolidated Account Controller Entity Type | Question 3iv | Conditional. Required if isOmnibus='N' AND isController='Y' | | LE = Legal Entity NP = Natural Person | cftcBatch/cftcForm102/relatedEntity@entityType |
| 58. | Consolidated Account Controller Optional | Question 3iv | Conditional. Required if isOmnibus='N' AND | Indicates that one or more "Optional Fields" or "Supplemental | Y = Yes N = No | cftcBatch/cftcForm102/relatedEntity@OptionalOrSuppFieldsSeparatelyReported |

| | Data Element | Form 102S Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|---|--|----------------------------------|--|---|---------------------|---|
| | Fields or Supplemental Fields Reported to LEI Provider | | isController='Y' | Fields" not included in this question were reported to the CICI Utility (or other CFTC-approved LEI provider) and are associated with the LEI provided in this submission | | |
| IF CONSOLIDATED ACCOUNT CONTROLLER IS A LEGAL ENTITY | | | | | | |
| 59. | Consolidated Account Controller Legal Entity Name | Question 3iv | Conditional. Required if isOmnibus='N' AND isController='Y' AND entityType='LE' AND OptionalOrSupp FieldsSeparately Reported='N' | Legal or registered name of the reportable account Controller | | cftcBatch/cftcForm102/relatedEntity@legalEntityName |
| IF CONSOLIDATED ACCOUNT CONTROLLER IS A NATURAL PERSON | | | | | | |

| | Data Element | Form 102S Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|----------------------------------|---|--|---------------------|--|
| 60. | Consolidated Account Controller Natural Person Last Name | Question 3iv | Conditional. Required if isOmnibus='N' AND isController='Y' AND OptionalOrSupp FieldsSeparately Reported='N' | Surname of the natural person reportable account Controller | | cftcBatch/cftcForm102/relatedEntity@lastName |
| 61. | Consolidated Account Controller Natural Person First Name | Question 3iv | Conditional. Required if isOmnibus='N' AND isController='Y' AND OptionalOrSupp FieldsSeparately Reported='N' | Given or first in order name of the natural person reportable account Controller | | cftcBatch/cftcForm102/relatedEntity@firstName |
| 62. | Consolidated Account Controller Natural Person Middle Name | Question 3iv | Conditional. Required if information available AND isOmnibus='N' AND isController='Y' AND OptionalOrSupp FieldsSeparately | | | cftcBatch/cftcForm102/relatedEntity@middleName |

| | Data Element | Form 102S Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|---|----------------------------------|--|---|---------------------|--|
| | | | Reported='N' | | | |
| 63. | Consolidated Account Controller Natural Person Suffix | Question 3iv | Conditional. Required if information available AND isOmnibus='N' AND isController='Y' AND OptionalOrSupp FieldsSeparately Reported='N' | | | cftcBatch/cftcForm102/relatedEntity@nameSuffix |
| FOR BOTH LEGAL ENTITIES AND NATURAL PERSONS | | | | | | |
| 64. | Consolidated Account Controller Street Address | Question 3iv | Conditional. Required if isOmnibus='N' AND isController='Y' AND OptionalOrSupp FieldsSeparately Reported='N' | Street address of the reportable account Controller | | cftcBatch/cftcForm102/relatedEntity@street |
| 65. | Consolidated Account Controller | Question 3iv | Conditional. Required if information | Suite of the reportable account | | cftcBatch/cftcForm102/relatedEntity@suite |

| | Data Element | Form 102S Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---------------------------------------|----------------------------------|--|---|---------------------|---|
| | Suite | | available AND isOmnibus='N' AND isController='Y' AND OptionalOrSupp FieldsSeparately Reported='N' | Controller | | |
| 66. | Consolidated Account Controller City | Question 3iv | Conditional. Required if isOmnibus='N' AND isController='Y' AND OptionalOrSupp FieldsSeparately Reported='N' | City of the reportable account Controller | | cftcBatch/cftcForm102/relatedEntity@city |
| 67. | Consolidated Account Controller State | Question 3iv | Conditional. Required if isOmnibus='N' AND isController='Y' AND OptionalOrSupp FieldsSeparately Reported='N' | ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters | | cftcBatch/cftcForm102/relatedEntity@state |

| | Data Element | Form 102S Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---|----------------------------------|---|--|---------------------|--|
| 68. | Consolidated Account Controller Country | Question 3iv | Conditional. Required if isOmnibus='N' AND isController='Y' | ISO 3166-1 alpha-2 country code | | cftcBatch/cftcForm102/relatedEntity@country |
| 69. | Consolidated Account Controller Zip/Postal Code | Question 3iv | Conditional. Required if isOmnibus='N' AND isController='Y' AND OptionalOrSuppFieldsSeparatelyReported='N' | Zip/Postal code of the reportable account Controller | | cftcBatch/cftcForm102/relatedEntity@postalCode |
| 70. | Consolidated Account Controller Phone Number | Question 3iv | Conditional. Required if isOmnibus='N' AND isController='Y' AND OptionalOrSuppFieldsSeparatelyReported='N' | Phone Number of the reportable account Controller | | cftcBatch/cftcForm102/relatedEntity@telephone |
| 71. | Consolidated Account Controller Email Address | Question 3iv | Conditional. Required if isOmnibus='N' AND isController='Y' | Email address of the reportable account Controller | | cftcBatch/cftcForm102/relatedEntity@email |

| | Data Element | Form 102S Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|---|--|----------------------------------|--|---|---------------------|---|
| | | | AND OptionalOrSupp FieldsSeparately Reported='N' | | | |
| IF CONSOLIDATED ACCOUNT CONTROLLER IS A LEGAL ENTITY | | | | | | |
| 72. | Consolidated Account Controller Contact Last Name | Question 3iv | Conditional. Required if isOmnibus='N' AND isController='Y' AND entityType='LE' AND OptionalOrSupp FieldsSeparately Reported='N' | Surname of the contact person for the owner | | cftcBatch/cftcForm102/relatedEntity/contact@lastName |
| 73. | Consolidated Account Controller Contact First Name | Question 3iv | Conditional. Required if isOmnibus='N' AND isController='Y' AND entityType='LE' AND OptionalOrSupp FieldsSeparately | First name of the contact person for the owner | | cftcBatch/cftcForm102/relatedEntity/contact@firstName |

| | Data Element | Form 102S Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---|----------------------------------|---|---|---------------------|--|
| | | | Reported='N' | | | |
| 74. | Consolidated Account Controller Contact Middle Name | Question 3iv | Conditional. Required if information available ANDisOmnibus='N' AND isController='Y' AND entityType='LE' AND OptionalOrSupp FieldsSeparately Reported='N' | Middle name of the contact person for the owner | | cftcBatch/cftcForm102/relatedEntity/contact@middleName |
| 75. | Consolidated Account Controller Contact Suffix | Question 3iv | Conditional. Required if information available ANDisOmnibus='N' AND isController='Y' AND entityType='LE' AND OptionalOrSupp FieldsSeparately | Suffix of the contact person for the owner | | cftcBatch/cftcForm102/relatedEntity/contact@nameSuffix |

| | Data Element | Form 102S Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---|----------------------------------|--|--|---------------------|---|
| | | | Reported='N' | | | |
| 76. | Consolidated Account Controller Contact Job Title | Question 3iv | Conditional. Required if isOmnibus='N' AND isController='Y' AND entityType='LE' AND OptionalOrSupp FieldsSeparately Reported='N' | Job title of the contact person at or related to the controller entity | | cftcBatch/cftcForm102/relatedEntity/contact@titleOrPosition |
| 77. | Contact Relationship to Consolidated Account Controller | Question 3iv | Conditional. Required if isOmnibus='N' AND isController='Y' AND entityType='LE' AND OptionalOrSupp FieldsSeparately Reported='N' | Contact relationship to controller entity | | cftcBatch/cftcForm102/relatedEntity/contact@relationship |
| 78. | Consolidated Account Controller | Question 3iv | Conditional. Required if isOmnibus='N' | Phone number of the contact person for the | | cftcBatch/cftcForm102/relatedEntity/contact@telephone |

| | Data Element | Form 102S Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---|----------------------------------|--|--|---------------------|---|
| | Contact Phone Number | | AND isController = 'Y' AND entityType = 'LE' AND OptionalOrSuppFieldsSeparatelyReported = 'N' | controller entity | | |
| 79. | Consolidated Account Controller Contact Email Address | Question 3iv | Conditional. Required if isOmnibus = 'N' AND isController = 'Y' AND entityType = 'LE' AND OptionalOrSuppFieldsSeparatelyReported = 'N' | Email address of the contact person for the controller entity | | cftcBatch/cftcForm102/relatedEntity/contact@email |
| 80. | Consolidated Account Controller NFA ID | Question 3iv | Conditional. Required if information available AND isOmnibus = 'N' AND isController = 'Y' AND OptionalOrSupp | The identification number given to the controller entity by the National Futures Association | | cftcBatch/cftcForm102/relatedEntity@NFAIdentifier |

| | Data Element | Form 102S Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---|----------------------------------|--|---|---------------------|--|
| | | | FieldsSeparately Reported='N' | | | |
| 81. | Consolidated Account Controller Legal Entity Identifier (LEI) | Question 3iv | Conditional. Required if information available AND isOmnibus='N' AND isController='Y' AND OptionalOrSupp FieldsSeparately Reported='Y' | The legal entity identifier (LEI) assigned to the controller entity by the LEI issuer | | cftcBatch/cftcForm102/relatedEntity@legalEntityIdentifier |
| 82. | Paired Swap Indicator | Question 4 | Yes | Indicates if response is related to paired swap activity | | cftcBatch/cftcForm102/pairedSwapOrSwaptionActivity@isSwap |
| 83. | Paired Swaption Indicator | Question 4 | Yes | Indicates if response is related to paired swaption activity | | cftcBatch/cftcForm102/pairedSwapOrSwaptionActivity@isSwaption |
| 84. | Paired Swaps and Swaptions Market Activity | Question 4 | Yes | Description of the nature of the counterparty's or customer's paired swaps and | | cftcBatch/cftcForm102/pairedSwapOrSwaptionActivity@description |

| | Data Element | Form 102S Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|----------------------------------|-----------------|--|--------------------------------------|--|
| | | | | swaptions market activity | | |
| 85. | Reporting Firm Authorization Indicator | Signature/Authentication | Yes | Indicates if the submitter is duly authorized by the reporting firm to provide the information and representations submitted on this Form 102, and that information and representations are true and correct | Y = authorized N = not authorized | cftcBatch/cftcForm102/contact@isAuthorizedRepresentative |
| 86. | Authorized Representative Last Name | Signature/Authentication | Yes | Surname of the authorized representative | | cftcBatch/cftcForm102/contact@lastName |
| 87. | Authorized Representative First Name | Signature/Authentication | Yes | Given or first in order name of the authorized representative | | cftcBatch/cftcForm102/contact@firstName |
| 88. | Authorized Representative Middle | Signature/Authentication | Yes | Middle name of the authorized representative | | cftcBatch/cftcForm102/contact@middleName |

| | Data Element | Form 102S Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|----------------------------------|-----------------|---|---------------------|---|
| | Name | | | | | |
| 89. | Authorized Representative Name Suffix | Signature/Authentication | Yes | Generation or name suffix of the authorized representative | | cftcBatch/cftcForm102/contact@nameSuffix |
| 90. | Authorized Representative Position | Signature/Authentication | Yes | Job position of the authorized representative | | cftcBatch/cftcForm102/contact@titleOrPosition |
| 91. | Authorized Representative Submitted on behalf of | Signature/Authentication | Yes | Reporting Firm Name 102 was submitted on behalf of | | cftcBatch/cftcForm102@onBehalfOf |
| 92. | Date of Submission | Signature/Authentication | Yes | Date [indicated by the authorized representative] that the form was submitted to CFTC | | cftcBatch/cftcForm102@submitDate |

Data Dictionary for Form 71 – Identification of omnibus accounts and sub-accounts¹⁹

| | Data Element | Form 71 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|----|---|-------------------------------|----------|---|--|---|
| 1. | Form Number | | Yes | | 71 | cftcBatch/cftcForm71@formNumber |
| 2. | Acknowledgment of Definitions Indicator | Acknowledgment of Definitions | Yes | Indicates whether the submitter acknowledged reading a list of terms used in the form | Y = Yes N = No | cftcBatch/cftcForm71@acknowledgeDefinitions |
| 3. | New/Modified/Correction Indicator | | Yes | Indicates whether the omnibus account is: <ul style="list-style-type: none"> • New and being reported for the first time on a Form 71 • Modified - | N = new M = modified C = corrected | cftcBatch/cftcForm71@informationType |

¹⁹ When reviewing the data elements in this Technical Document, reporting parties should also review and consult the OCR Final Rule, including the requirements of the reporting forms attached as an appendix thereto. The reporting forms are the basis for these data elements. Reporting parties should visit this link to view the OCR Final Rule on the Federal Register: <https://www.federalregister.gov/articles/2013/11/18/2013-26789/ownership-and-control-reports-forms-102102s-4040s-and-71>

Visit this link to view a pdf copy of the OCR Final Rule: <http://www.cftc.gov/ucm/groups/public/@Irfederalregister/documents/file/2013-26789a.pdf>

| | Data Element | Form 71 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-----------|------------------------------|--------------------------------|-----------------|---|---------------------|------------------------------------|
| | | | | <p>previously reported on a Form 71 and being re-submitted because something has changed</p> <ul style="list-style-type: none"> • Corrected - being reported in order to correct previously-submitted erroneous data | | |
| 4. | Account Number ²⁰ | Section A | Yes | Account number of the omnibus volume threshold account (from | | cftcBatch/cftcForm71@accountNumber |

²⁰ For all fields in section A and B of Form 71 that are marked as auto-populated in the reporting forms that appear as an appendix to the OCR Final Rule, the CFTC will provide these fields to FTP-based reporting parties in an email or other transmission. Reporting parties should incorporate these fields in their FTP submission.

| | Data Element | Form 71 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-----------|----------------------------|--------------------------------|-----------------|---|----------------------------------|---|
| | | | | Form 102B) or omnibus reportable sub-account (from Form 71) as identified on the referenced forms | | |
| 5. | Form Type Origination | Section A | Yes | Form type of the form which identified the omnibus volume threshold account (Form 102B) or omnibus reportable sub-account (Form 71) | 102B = Form 102B 71 = Form 71 | cftcBatch/cftcForm71@originalFormNumber |
| 6. | Name of Identifying Entity | Section A | Yes | Name of the clearing member (if Form 102B) or preceding originator (if Form 71) that identified the omnibus volume threshold account or omnibus reportable sub-account, | | |

| | Data Element | Form 71 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---------------------------|--------------------------------|--|---|---------------------|--------------------------------------|
| | | | | respectively | | |
| 7. | Reporting Market | Section A | Yes | The reporting contract market on which the identified account is traded | | cftcBatch/cftcForm71@marketId |
| 8. | Entity Type Indicator | Section A | Yes | | LE=Legal Entity | cftcBatch/cftcForm71@entityType |
| 9. | Name of Originator | Section A | Yes | | | cftcBatch/cftcForm71@legalEntityName |
| 10. | Originator Street Address | Section A | Yes | Street Address of the omnibus account originator as indicated on the Form 102B or Form 71 | | cftcBatch/cftcForm71@street |
| 11. | Originator Suite | Section A | Conditional. Required if information available | | | cftcBatch/cftcForm71@suite |
| 12. | Originator City | Section A | Yes | City of the omnibus account originator as indicated on the Form 102B or Form 71 | | cftcBatch/cftcForm71@city |

| | Data Element | Form 71 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|----------------------------|--------------------------------|-----------------|--|---------------------|---------------------------------|
| 13. | Originator State | Section A | Yes | ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters as indicated on the Form 102B or Form 71 | | cftcBatch/cftcForm71@state |
| 14. | Originator Country | Section A | Yes | ISO 3166-1 alpha-2 country code as indicated on the Form 102B or Form 71 | | cftcBatch/cftcForm71@country |
| 15. | Originator Zip/Postal Code | Section A | Yes | Zip Code or Postal Code of the omnibus account originator as indicated on the Form 102B or Form 71 | | cftcBatch/cftcForm71@postalCode |
| 16. | Originator Phone Number | Section A | Yes | Phone Number of the omnibus account originator as indicated on the Form 102B or Form 71 | | cftcBatch/cftcForm71@telephone |

| | Data Element | Form 71 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--------------------------------|--------------------------------|--|---|---------------------|--|
| 17. | Originator Contact Last Name | Section A | Yes | Contact surname for the omnibus account originator as indicated on the Form 102B or Form 71 | | cftcBatch/cftcForm71/contact@lastName |
| 18. | Originator Contact Middle Name | Section A | Conditional. Required if information available | | | cftcBatch/cftcForm71/contact@middleName |
| 19. | Originator Contact First Name | Section A | Yes | Contact first in order name for the omnibus account originator as indicated on the Form 102B or Form 71 | | cftcBatch/cftcForm71/contact@firstName |
| 20. | Originator Contact Suffix | Section A | Conditional. Required if information available | | | cftcBatch/cftcForm71/contact@nameSuffix |
| 21. | Originator Contact Job Title | Section A | Yes | Job Title of the Contact for the omnibus account originator as indicated on the Form 102B or | | cftcBatch/cftcForm71/contact@titleOrPosition |

| | Data Element | Form 71 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|------------------------------------|--------------------------------|--|--|---------------------|---|
| | | | | Form 71 | | |
| 22. | Contact Relationship to Originator | Section A | Yes | Contact relationship to the originator | | cftcBatch/cftcForm71/contact@relationship |
| 23. | Originator Contact Phone Number | Section A | Yes | Phone Number of the Contact for the omnibus account originator as indicated on the Form 102B or Form 71 | | cftcBatch/cftcForm71/contact@telephone |
| 24. | Originator Contact Email Address | Section A | Yes | Email Address of the Contact for the omnibus account originator as indicated on the Form 102B or Form 71 | | cftcBatch/cftcForm71/contact@email |
| 25. | Originator Website | Section A | Conditional. Required if information available | URL of the website of the omnibus account originator | | cftcBatch/cftcForm71@website |
| 26. | Originator NFA ID | Section A | Conditional. Required if information available | The identification number given to the originator by the National | | cftcBatch/cftcForm71@NFAIdentifier |

| | Data Element | Form 71 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|--------------------------------|--|--|--|--|
| | | | | Futures Association | | |
| 27. | Originator Legal Entity Identifier (LEI) | Section A | Conditional. Required if information available | The legal entity identifier (LEI) assigned to the originator by the LEI issuer | | cftcBatch/cftcForm71@legalEntityIdentifier |
| 28. | Allocation of Trades Indicator | Section B – Question 1 | Yes | Indicates if the originator allocated trades from the specified omnibus account on the specified date on the specified reporting market | Y = trades were allocated N = trades were not allocated | cftcBatch/cftcForm71@tradesAllocated |
| 29. | Sum of Allocations Reportable Trading Volume for Recipient Account Indicator | Section B – Question 2 | Yes | For cases where trades were allocated, indicates whether the sum of allocations resulted in reportable trading volume for a recipient account on the specified date on the | Y = resulted in reportable trading volume N = did not result in reportable trading volume | cftcBatch/cftcForm71@isReportable |

| | Data Element | Form 71 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|---|--|--------------------------------|---|---|---------------------------|---|
| | | | | specified reporting market | | |
| REPORTABLE SUB-ACCOUNT OWNERSHIP AND CONTROL INFORMATION | | | | | | |
| OMNIBUS REPORTABLE SUB-ACCOUNT INFORMATION | | | | | | |
| 30. | Reportable Sub-Account Number | Question 3 | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' | | | cftcBatch/cftcForm71/relatedAccount@accountNumber |
| 31. | Reportable Sub-Account Omnibus Account Indicator | Question 3ai | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' | Is the Reportable Sub-Account an omnibus account | Y = Yes N = No | cftcBatch/cftcForm71/relatedAccount@isOmnibus |
| 32. | House or Customer Indicator | Question 3aii | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='Y' | If the reported Reportable Sub-Account is being reported as an Omnibus Account indicate whether the Reportable Sub-Account Omnibus Account is a | H = House C = Customer | cftcBatch/cftcForm71/relatedAccount@accountClass |

| | Data Element | Form 71 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---|--------------------------------|---|---|---------------------|---|
| | | | | house or customer account of the reporting firm | | |
| 33. | Reportable Sub-Account Omnibus Account Originator Indicator | Question 3aai | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='Y' THEN isOriginator='Y' | Indicates reporting Volume Threshold Account Omnibus Account orginiator | Y = Yes N = No | cftcBatch/ cftcForm71/relatedAccount/ relatedEntity@isOriginator |
| 34. | Reportable Sub-Account Omnibus Account Entity Type | Question 3aai | Yes | | LE=Legal Entity | cftcBatch/ cftcForm71/relatedAccount/ relatedEntity@entityType |
| 35. | Reportable Sub-Account Omnibus Account Originator Name | Question 3aai | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='Y' | Name of the reportable account Originator | | cftcBatch/ cftcForm71/relatedAccount/ relatedEntity@legalEntityName |
| 36. | Reportable Sub-Account Omnibus | Question 3aai | Conditional. Required if isReportable='Y' | Street address of the reportable account | | cftcBatch/ cftcForm71/relatedAccount/ relatedEntity@street |

| | Data Element | Form 71 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---|--------------------------------|--|---|---------------------|---|
| | Account Originator Street Address | | AND tradesAllocated='Y' AND isOmnibus ='Y' | Originator | | |
| 37. | Reportable Sub-Account Omnibus Account Originator Suite | Question 3a ii | Conditional. Required if information available AND isReportable='Y' AND tradesAllocated='Y' AND isOmnibus ='Y' | | | cftcBatch/ cftcForm71/relatedAccount/ relatedEntity@suite |
| 38. | Reportable Sub-Account Omnibus Account Originator City | Question 3a ii | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus ='Y' | City of the reportable account Originator | | cftcBatch/ cftcForm71/relatedAccount/ relatedEntity@city |
| 39. | Reportable Sub-Account Omnibus Account Originator State | Question 3a ii | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus ='Y' | ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters | | cftcBatch/ cftcForm71/relatedAccount/ relatedEntity@state |
| 40. | Reportable Sub-Account | Question 3a ii | Conditional. Required if | ISO 3166-1 alpha-2 country | | cftcBatch/ cftcForm71/relatedAccount/ |

| | Data Element | Form 71 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---|--------------------------------|---|--|---------------------|--|
| | Omnibus Account Originator Country | | isReportable='Y' AND tradesAllocated='Y' AND isOmnibus ='Y' | code | | relatedEntity@country |
| 41. | Reportable Sub-Account Omnibus Account Originator Zip/Postal Code | Question 3a ii | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus ='Y' | Zip/Postal code of the reportable account Originator | | cftcBatch/ cftcForm71/relatedAccount/ relatedEntity@postalCode |
| 42. | Reportable Sub-Account Omnibus Account Originator Phone Number | Question 3a ii | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus ='Y' | Phone Number of the reportable account Originator | | cftcBatch/ cftcForm71/relatedAccount/ relatedEntity@telephone |
| 43. | Reportable Sub-Account Omnibus Account Originator Contact Last Name | Question 3a ii | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus ='Y' AND entityType='LE' | Surname of the contact person for the Originator | | cftcBatch/ cftcForm71/relatedAccount/ relatedEntity/contact@lastName |

| | Data Element | Form 71 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-----|--|--------------------------------|---|--|---------------------|---|
| 44. | Reportable Sub-Account Omnibus Account Originator Contact First Name | Question 3a ii | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='Y' AND entityType='LE' | First name of the contact person for the Originator | | cftcBatch/cftcForm71/relatedAccount/relatedEntity/contact@firstName |
| 45. | Reportable Sub-Account Omnibus Account Contact Middle Name | Question 3a ii | Conditional. Required if information available AND isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='Y' AND entityType='LE' | Middle name of the contact person for the Originator | | cftcBatch/cftcForm71/relatedAccount/relatedEntity/contact@middleName |
| 46. | Reportable Sub-Account Omnibus Account Contact Suffix | Question 3a ii | Conditional. Required if information available AND isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='Y' | Suffix of the contact person for the Originator | | cftcBatch/cftcForm102/relatedAccount/relatedEntity/contact@nameSuffix |

| | Data Element | Form 71 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---|--------------------------------|--|--|---------------------|--|
| | | | AND entityType='LE' | | | |
| 47. | Reportable Sub-Account Omnibus Account Originator Contact Job Title | Question 3a ii | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='Y' AND entityType='LE' | Job title of the contact person for the Originator entity | | cftcBatch/cftcForm102/relatedAccount/relatedEntity/contact@titleOrPosition |
| 48. | Contact Relationship to Reportable Sub-Account Omnibus Account Originator | Question 3a ii | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='Y' AND entityType='LE' | Contact relationship to the Originator entity | | cftcBatch/cftcForm71/relatedAccount/relatedEntity/contact@relationship |
| 49. | Reportable Sub-Account Omnibus Account Originator Contact Phone Number | Question 3a ii | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='Y' AND entityType='LE' | Phone number of the contact person for the Originator entity | | cftcBatch/cftcForm71/relatedAccount/relatedEntity/contact@telephone |

| | Data Element | Form 71 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---|--------------------------------|---|--|---------------------|---|
| 50. | Reportable Sub-Account Omnibus Account Originator Contact Email Address | Question 3a ii | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='Y' AND entityType='LE' | Email address of the contact person for the Originator entity | | cftcBatch/ cftcForm71/relatedAccount/ relatedEntity/contact@email |
| 51. | Reportable Sub-Account Omnibus Account Originator Website | Question 3a ii | Conditional. Required if information available AND isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='Y' AND entityType='LE' | URL of the Originator's website | | cftcBatch/ cftcForm71/relatedAccount/ relatedEntity@website |
| 52. | Reportable Sub-Account Omnibus Account Originator NFA ID | Question 3a ii | Conditional. Required if information available AND isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='Y' | The identification number given to the Originator entity by the National Futures Association | | cftcBatch/ cftcForm71/relatedAccount/ relatedEntity@NFAIdentifier |

| | Data Element | Form 71 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|---|--------------------------------|---|---|--|--|
| | | | | | | |
| 53. | Reportable Sub-Account Omnibus Account Originator Legal Entity Identifier (LEI) | Question 3aii | Conditional. Required if information available AND isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='Y' | The legal entity identifier (LEI) assigned to the Originator entity by the LEI issuer | | cftcBatch/ cftcForm71/relatedAccount/ relatedEntity@legalEntityId entifier |
| NON-OMNIBUS REPORTABLE SUB-ACCOUNT OWNER(S) | | | | | | |
| 54. | Reportable Sub-Account Owner Indicator | Question 3bi | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='N' THEN isOwner='Y' | Indicates reporting Reportable Sub-Account account owner | Y = Yes N = No | cftcBatch/ cftcForm71/ relatedAccount/relatedEntity @isOwner |
| 55. | Reportable Sub-Account Owner Type Indicator | Question 3bi | Conditional. Required if isReportable='Y' AND tradesAllocated= | Indicates whether the Reportable Sub-Account owner is a legal entity or natural | LE = Legal Entity NP = Natural Person | cftcBatch/ cftcForm71/ relatedAccount/relatedEntity @entityType |

| | Data Element | Form 71 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|--|--------------------------------|--|--|---------------------|--|
| | | | 'Y' AND isOmnibus='N' AND isOwner='Y' | person | | |
| IF REPORTABLE SUB-ACCOUNT OWNER IS A LEGAL ENTITY | | | | | | |
| 56. | Reportable Sub-Account Owner Legal Entity Name | Question 3bi | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' | Legal or registered name of the reportable sub-account owner | | cftcBatch/ cftcForm71/ relatedAccount/relatedEntity @legalEntityName |
| IF REPORTABLE SUB-ACCOUNT OWNER IS A NATURAL PERSON | | | | | | |
| 57. | Reportable Sub-Account Owner Last Name | Question 3bi | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='N' AND | Surname of the natural person reportable sub-account owner | | cftcBatch/ cftcForm71/ relatedAccount/relatedEntity @lastName |

| | Data Element | Form 71 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|--------------------------------|---|---|---------------------|--|
| | | | isOwner='Y' AND entityType='NP' | | | |
| 58. | Reportable Sub-Account Owner First Name | Question 3bi | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='N' AND isOwner='Y' AND entityType='NP' | Given or first in order name of the natural person reportable sub-account owner | | cftcBatch/cftcForm71/ relatedAccount/relatedEntity @firstName |
| 59. | Reportable Sub-Account Owner Middle Name | Question 3bi | Conditional. Required if information available AND isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='N' AND isOwner='Y' AND entityType='NP' | Middle name of the natural person reportable sub-account owner | | cftcBatch/cftcForm71/ relatedAccount/relatedEntity @middleName |

| | Data Element | Form 71 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|---|--------------------------------|---|---|---------------------|--|
| 60. | Reportable Sub-Account Owner Suffix | Question 3bi | Conditional. Required if information available AND isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='N' AND isOwner='Y' AND entityType='NP' | Suffix of the natural person reportable sub-account owner | | cftcBatch/cftcForm71/relatedAccount/relatedEntity@nameSuffix |
| FOR BOTH LEGAL ENTITIES AND NATURAL PERSONS | | | | | | |
| 61. | Reportable Sub-Account Owner Street Address | Question 3bi | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='N' AND isOwner='Y' | Street address of the reportable sub-account owner | | cftcBatch/cftcForm71/relatedAccount/relatedEntity@street |
| 62. | Reportable Sub-Account Owner Suite | Question 3bi | Conditional. Required if information available AND isReportable | Suite of the reportable sub-account owner | | cftcBatch/cftcForm71/relatedAccount/relatedEntity@suite |

| | Data Element | Form 71 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--------------------------------------|--------------------------------|---|---|---------------------|---|
| | | | e='Y' AND tradesAllocated='Y' AND isOmnibus='N' AND isOwner='Y' | | | |
| 63. | Reportable Sub-Account Owner City | Question 3bi | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='N' AND isOwner='Y' | City of the reportable sub-account owner | | cftcBatch/cftcForm71/relatedAccount/relatedEntity@city |
| 64. | Reportable Sub-Account Owner State | Question 3bi | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='N' AND isOwner='Y' | ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters | | cftcBatch/cftcForm71/relatedAccount/relatedEntity@state |
| 65. | Reportable Sub-Account Owner Country | Question 3bi | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOwner='Y' | ISO 3166-1 alpha-2 country code | | cftcBatch/cftcForm71/relatedAccount/relatedEntity@country |

| | Data Element | Form 71 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|--|--------------------------------|---|---|---------------------|--|
| | | | 'Y' AND isOmnibus='N' AND isOwner='Y' | | | |
| 66. | Reportable Sub-Account Owner Zip/Postal Code | Question 3bi | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='N' AND isOwner='Y' | Zip/Postal code of the reportable sub-account owner | | cftcBatch/cftcForm71/relatedAccount/relatedEntity@postalCode |
| 67. | Reportable Sub-Account Owner Phone Number | Question 3bi | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='N' AND isOwner='Y' | Phone Number of the reportable sub-account owner | | cftcBatch/cftcForm71/relatedAccount/relatedEntity@telephone |
| IF REPORTABLE SUB-ACCOUNT OWNER IS A NATURAL PERSON | | | | | | |
| 68. | Reportable Sub-Account Owner Email Address | Question 3bi | Conditional. Required if isReportable='Y' AND | Email address of the reportable sub-account owner | | cftcBatch/cftcForm71/relatedAccount/relatedEntity@email |

| | Data Element | Form 71 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|---|--------------------------------|--|---|---------------------|---|
| | | | tradesAllocated='Y' AND isOmnibus='N' AND isOwner='Y' | | | |
| IF REPORTABLE SUB-ACCOUNT OWNER IS A LEGAL ENTITY | | | | | | |
| 69. | Reportable Sub-Account Owner Contact Last Name | Question 3bi | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' | Surname of the contact person for the owner | | cftcBatch/cftcForm71/ relatedAccount/relatedEntity /contact@lastName |
| 70. | Reportable Sub-Account Owner Contact First Name | Question 3bi | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' | First name of the contact person for the owner | | cftcBatch/cftcForm71/ relatedAccount/relatedEntity /contact@firstName |

| | Data Element | Form 71 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|--------------------------------|---|---|---------------------|---|
| 71. | Reportable Sub-Account Owner Contact Middle Name | Question 3bi | Conditional. Required if information available AND isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' | Middle name of the contact person for the owner | | cftcBatch/cftcForm71/relatedAccount/relatedEntity/contact@middleName |
| 72. | Reportable Sub-Account Owner Contact Suffix | Question 3bi | Conditional. Required if information available AND isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' | Suffix of the contact person for the owner | | cftcBatch/cftcForm71/relatedAccount/relatedEntity/contact@nameSuffix |
| 73. | Reportable Sub-Account Owner | Question 3bi | Conditional. Required if isReportable='Y' | Job title of the contact person for the ownership | | cftcBatch/cftcForm71/relatedAccount/relatedEntity/contact@titleOrPosition |

| | Data Element | Form 71 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|--------------------------------|--|---|---------------------|--|
| | Contact Job Title | | AND tradesAllocated='Y' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' | entity | | |
| 74. | Contact Relationship to Reportable Sub-Account Owner | Question 3bi | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' | Contact relationship to the ownership entity | | cftcBatch/cftcForm71/ relatedAccount/relatedEntity /contact@relationship |
| 75. | Reportable Sub-Account Owner Contact Phone Number | Question 3bi | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='N' AND isOwner='Y' AND | Phone number of the contact person for the ownership entity | | cftcBatch/cftcForm71/ relatedAccount/relatedEntity /contact@telephone |

| | Data Element | Form 71 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|--------------------------------|---|--|---------------------|---|
| | | | entityType='LE' | | | |
| 76. | Reportable Sub-Account Owner Contact Email Address | Question 3bi | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' | Email address of the contact person for the ownership entity | | cftcBatch/cftcForm71/relatedAccount/relatedEntity/contact@email |
| 77. | Reportable Sub-Account Owner Website | Question 3bi | Conditional. Required if information available AND isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' | URL of the owner's website | | cftcBatch/cftcForm71/relatedAccount/relatedEntity@website |
| 78. | Reportable Sub-Account Owner NFA | Question 3bi | Conditional. Required if information | The identification number given to the ownership | | cftcBatch/cftcForm71/relatedAccount/relatedEntity@NFAIdentifier |

| | Data Element | Form 71 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|---|--|--------------------------------|---|--|---------------------|---|
| | ID | | available AND isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='N' AND isOwner='Y' | entity by the National Futures Association | | |
| 79. | Reportable Sub-Account Owner Legal Entity Identifier (LEI) | Question 3bi | Conditional. Required if information available AND isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='N' AND isOwner='Y' | The legal entity identifier (LEI) assigned to the ownership entity by the LEI issuer | | cftcBatch/cftcForm71/relatedAccount/relatedEntity@legalEntityIdentifier |
| NON-OMNIBUS REPORTABLE SUB-ACCOUNT CONTROLLER(S) | | | | | | |
| 80. | Reportable Sub-Account Controller Indicator | Question 3bii | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='N' THEN | Indicates reportable sub-account controller | Y = Yes N = No | cftcBatch/cftcForm71/relatedAccount/relatedEntity@isController |

| | Data Element | Form 71 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---|--------------------------------|---|--|---------------------|--|
| | | | isController='Y' | | | |
| 81. | Reportable Sub-Account Controller Entity Type | Question 3bii | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='N' AND isController='Y' THEN entityType='NP' | Reportable sub-account controller entity type | NP = Natural Person | cftcBatch/cftcForm71/relatedAccount/relatedEntity@entityType |
| 82. | Reportable Sub-Account Controller Natural Person Last Name | Question 3bii | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='N' AND isController='Y' | Surname of the natural person reportable sub-account Controller | | cftcBatch/cftcForm71/relatedAccount/relatedEntity@lastName |
| 83. | Reportable Sub-Account Controller Natural Person First Name | Question 3bii | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND | Given or first in order name of the natural person reportable sub-account Controller | | cftcBatch/cftcForm71/relatedAccount/relatedEntity@firstName |

| | Data Element | Form 71 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|--------------------------------|---|---|---------------------|--|
| | | | isOmnibus='N' AND isController='Y' | | | |
| 84. | Reportable Sub-Account Controller Natural Person Middle Name | Question 3bii | Conditional. Required if information available AND isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='N' AND isController='Y' | Middle name of the natural person reportable sub-account Controller | | cftcBatch/cftcForm71/relatedAccount/relatedEntity@middleName |
| 85. | Reportable Sub-Account Controller Natural Person Suffix | Question 3bii | Conditional. Required if information available AND isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='N' AND isController='Y' | Suffix of the natural person reportable sub-account Controller | | cftcBatch/cftcForm71/relatedAccount/relatedEntity@nameSuffix |
| 86. | Reportable Sub-Account Controller Street | Question 3bii | Conditional. Required if isReportable='Y' AND | Street address of the reportable sub-account Controller | | cftcBatch/cftcForm71/relatedAccount/relatedEntity@street |

| | Data Element | Form 71 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---|--------------------------------|---|--|---------------------|---|
| | Address | | tradesAllocated='Y' AND isOmnibus='N' AND isController='Y' | | | |
| 87. | Reportable Sub-Account Controller Suite | Question 3bii | Conditional. Required if information available AND isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='N' AND isController='Y' | Suite of the reportable sub-account Controller | | cftcBatch/cftcForm71/ relatedAccount/relatedEntity @suite |
| 88. | Reportable Sub-Account Controller City | Question 3bii | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='N' AND isController='Y' | City of the reportable sub-account Controller | | cftcBatch/cftcForm71/ relatedAccount/relatedEntity @city |
| 89. | Reportable Sub-Account Controller State | Question 3bii | Conditional. Required if isReportable='Y' AND | ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric | | cftcBatch/cftcForm71/ relatedAccount/relatedEntity @state |

| | Data Element | Form 71 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---|--------------------------------|--|--|---------------------|--|
| | | | tradesAllocated='Y' AND isOmnibus='N' AND isController='Y' | characters | | |
| 90. | Reportable Sub-Account Controller Country | Question 3bii | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='N' AND isController='Y' | ISO 3166-1 alpha-2 country code | | cftcBatch/cftcForm71/relatedAccount/relatedEntity@country |
| 91. | Reportable Sub-Account Controller Zip/Postal Code | Question 3bii | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='N' AND isController='Y' | Zip/Postal code of the reportable sub-account Controller | | cftcBatch/cftcForm71/relatedAccount/relatedEntity@postalCode |
| 92. | Reportable Sub-Account Controller Phone Number | Question 3bii | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND | Phone Number of the reportable sub-account Controller | | cftcBatch/cftcForm71/relatedAccount/relatedEntity@telephone |

| | Data Element | Form 71 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|--------------------------------|---|---|---------------------|---|
| | | | isOmnibus='N' AND isController='Y' | | | |
| 93. | Reportable Sub-Account Controller Name of Employer | Question 3bii | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='N' AND isController='Y' | | | cftcBatch/cftcForm71/ relatedAccount/relatedEntity @employerName |
| 94. | Reportable Sub-Account Controller Job Title | Question 3bii | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='N' AND isController='Y' | Job title of the contact person for the Controller entity | | cftcBatch/cftcForm71/ relatedAccount/relatedEntity @titleOrPosition |
| 95. | Relationship to Reportable Sub-Account Owner | Question 3bii | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='N' AND | Contact relationship to the Owner entity | | cftcBatch/cftcForm71/ relatedAccount/relatedEntity @relationship |

| | Data Element | Form 71 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---|--------------------------------|--|--|--------------------------------------|---|
| | | | isController='Y' | | | |
| 96. | Reportable Sub-Account Controller Email Address | Question 3bii | Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='N' AND isController='Y' | Email address of the reportable sub-account Controller | | cftcBatch/cftcForm71/relatedAccount/relatedEntity@email |
| 97. | Reportable Sub-Account Controller NFA ID | Question 3bii | Conditional. Required if information available AND isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='N' AND isController='Y' | The identification number given to the Controller entity by the National Futures Association | | cftcBatch/cftcForm71/relatedAccount/relatedEntity@NFAIdentifier |
| 98. | Originator Authorization Indicator | Section C | Yes | Indicates if the submitter is duly authorized by the relevant originator (as specified on the Form 102B or | Y = authorized N = not authorized | cftcBatch/cftcForm71/contact@isAuthorizedRep |

| | Data Element | Form 71 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|---------------------------------------|--------------------------------|-----------------|---|---------------------|--|
| | | | | Form 71), to provide the information and representations submitted on this Form 71, and that information and representations are true and correct | | |
| 99. | Authorized Representative Last Name | Section C | Yes | Surname of the authorized representative | | cftcBatch/cftcForm71/contact@lastName |
| 100. | Authorized Representative First Name | Section C | Yes | Given or first in order name of the authorized representative | | cftcBatch/cftcForm71/contact@firstName |
| 101. | Authorized Representative Middle Name | Section C | Yes | Middle name of the authorized representative | | cftcBatch/cftcForm71/contact@middleName |
| 102. | Authorized Representative Name Suffix | Section C | Yes | Generation or name suffix of the authorized representative | | cftcBatch/cftcForm71/contact@nameSuffix |
| 103. | Authorized Representative Position | Section C | Yes | Job position of the authorized representative | | cftcBatch/cftcForm71/contact@titleOrPosition |

| | Data Element | Form 71 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|---------------------|--------------------------------|-----------------|---|---------------------|---------------------------------|
| 104. | Date of Submission | Section C | Yes | Date [indicated by the authorized representative] that the form was submitted to CFTC | | cftcBatch/cftcForm71@submitDate |

Data Dictionary for Form 40 – Statement of reporting trader²¹

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-----------|---|---|-----------------|---|---------------------|---|
| 1. | Form Number | | Yes | | 40 | cftcBatch/cftcForm40@formNumber |
| 2. | Acknowledgment of Definitions Indicator | Section – Acknowledgment of Definitions | Yes | Indicates whether the submitter acknowledged reading a list of terms used in the form | Y = Yes N = No | cftcBatch/cftcForm40@acknowledgeDefinitions |

²¹ When reviewing the data elements in this Technical Document, reporting parties should also review and consult the OCR Final Rule, including the requirements of the reporting forms attached as an appendix thereto. The reporting forms are the basis for these data elements. Reporting parties should visit this link to view the OCR Final Rule on the Federal Register: <https://www.federalregister.gov/articles/2013/11/18/2013-26789/ownership-and-control-reports-forms-102102s-4040s-and-71>

Visit this link to view a pdf copy of the OCR Final Rule: <http://www.cftc.gov/ucm/groups/public/@lrfederalregister/documents/file/2013-26789a.pdf>

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-----------|-----------------------------------|--------------------------------|-----------------|---|---|--------------------------------------|
| 3. | New/Modified/Correction Indicator | | Yes | <p>Indicates whether the reportable trader is:</p> <ul style="list-style-type: none"> • New and being reported for the first time on a Form 40 • Modified - previously reported on a Form 40 and being re-submitted because something has changed • Corrected - being reported in order to correct previousl | <p>N = New M = Modified C = Corrected</p> | cftcBatch/cftcForm40@informationType |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|---------------------------------------|--------------------------------|--|--|--|--------------------------------------|
| | | | | y-submitted erroneous data | | |
| REPORTING TRADER CONTACT INFORMATION | | | | | | |
| 4. | Trader Type Indicator | Question 1 | Yes | Indicates whether the reporting trader is a legal entity or natural person | LE = Legal Entity NP = Natural Person | cftcBatch/cftcForm40@entityType |
| IF REPORTING TRADER IS A LEGAL ENTITY | | | | | | |
| 5. | Legal Entity Name of Reporting Trader | Question 1 | Conditional. Required if entityType = 'LE' | The legal name of the reporting trader (if legal entity). | | cftcBatch/cftcForm40@legalEntityName |
| IF REPORTING TRADER IS A NATURAL PERSON | | | | | | |
| 6. | Last Name of Reporting Trader | Question 1 | Conditional. Required if entityType = 'NP' | Surname of the reporting trader | | cftcBatch/cftcForm40@lastName |
| 7. | First Name of Reporting Trader | Question 1 | Conditional. Required if entityType = 'NP' | Given or first in order name of the reporting trader | | cftcBatch/cftcForm40@firstName |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|-------------------------------------|--------------------------------|--|---|---------------------|---------------------------------|
| 8. | Middle Name of Reporting Trader | Question 1 | Conditional. Required if information available AND entityType = 'NP' | Middle name of the reporting trader | | cftcBatch/cftcForm40@middleName |
| 9. | Name Suffix of the Reporting Trader | Question 1 | Conditional. Required if information available AND entityType = 'NP' | Generational or name suffix of the reporting trader | | cftcBatch/cftcForm40@nameSuffix |
| FOR BOTH LEGAL ENTITIES AND NATURAL PERSONS | | | | | | |
| 10. | Street Address of Reporting Trader | Question 1 | Yes | The street address of the reporting trader | | cftcBatch/cftcForm40@street |
| 11. | Suite Number of Reporting Trader | Question 1 | Conditional. Required if information available | The suite number of the reporting trader | | cftcBatch/cftcForm40@suite |
| 12. | City of Reporting Trader | Question 1 | Yes | The city of the reporting trader | | cftcBatch/cftcForm40@city |
| 13. | State of Reporting Trader | Question 1 | Yes | ISO 3166-2 geopolitical subdivision code; | | cftcBatch/cftcForm40@state |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|-------------------------------------|--------------------------------|--|---|---------------------|------------------------------------|
| | | | | 1-3 alphanumeric characters | | |
| 14. | Country of Reporting Trader | Question 1 | Yes | ISO 3166-1 alpha-2 country code | | cftcBatch/cftcForm40@country |
| 15. | Zip/Postal Code of Reporting Trader | Question 1 | Yes | The zip code or postal code of the reporting trader | | cftcBatch/cftcForm40@postalCode |
| 16. | Phone Number of Reporting Trader | Question 1 | Yes | The phone number of the reporting trader | | cftcBatch/cftcForm40@telephone |
| 17. | Email Address of Reporting Trader | Question 1 | Yes | The email address of the reporting trader | | cftcBatch/cftcForm40@email |
| 18. | Website of Reporting Trader | Question 1 | Conditional. Required if information available | The website of the reporting trader | | cftcBatch/cftcForm40@website |
| 19. | NFA ID of Reporting Trader | Question 1 | Conditional. Required if information available | The identification number given to the reporting trader by the National Futures Association | | cftcBatch/cftcForm40@NFAidentifier |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|---|---|--------------------------------|--|--|---------------------|---|
| 20. | Legal Entity Identifier of Reporting Trader | Question 1 | Conditional. Required if information available | The legal entity identifier (LEI) assigned to the reporting trader by the LEI issuer | | cftcBatch/cftcForm40@legalEntityIdentifier |
| 21. | Name of Reporting Trader's Employer | Question 1 | Yes | The name of the trader's employer | | cftcBatch/cftcForm40@employerName |
| 22. | Reporting Trader's Employer's NFA ID | Question 1 | Conditional. Required if information available | The identification number given to the reporting trader's employer by the National Futures Association | | cftcBatch/cftcForm40@employerNFAIdentifier |
| 23. | Reporting Trader's Employer's Legal Entity Identifier | Question 1 | Conditional. Required if information available | The legal entity identifier (LEI) assigned to the reporting trader's employer by the LEI issuer | | cftcBatch/cftcForm40@employerLEI |
| CONTACT INFORMATION – DERIVATIVES TRADING CONTACT PERSON | | | | | | |
| 24. | Contact for Derivatives Trading of Reporting | Question 2 | Yes | Indicates whether the contact information is regarding the | Y = Yes N = No | cftcBatch/CftcForm40/contact@isDerivativesPOC |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|--------------------------------|--|---|---------------------|---|
| | Trader | | | derivatives trading of the reporting traders | | |
| 25. | Individual to Contact Regarding Derivatives Trading has same information as Reporting Trader | Question 2 | Yes | Indicates whether the contact information for derivatives trading is the same as the reporting trader | Y = Yes N = No | cftcBatch/CftcForm40/contact@isSameAsReporter |
| 26. | Last Name of Contact for Reporting Trader's Derivatives Trading | Question 2 | Yes | Surname of the contact person for the reporting trader's derivatives trading | | cftcBatch/cftcForm40/contact@lastName |
| 27. | First Name of Contact for Reporting Trader's Derivatives Trading | Question 2 | Yes | Given or first in order name of the contact person for the reporting trader's derivatives trading | | cftcBatch/cftcForm40/contact@firstName |
| 28. | Middle Name of Contact for Reporting | Question 2 | Conditional. Required if information available | Middle name of the contact person for the reporting trader's | | cftcBatch/cftcForm40/contact @middleName |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|--------------------------------|--|---|---------------------|---|
| | Trader's Derivatives Trading | | | derivatives trading | | |
| 29. | Name Suffix of Contact for Reporting Trader's Derivatives Trading | Question 2 | Conditional. Required if information available | Suffix of the contact person for the reporting trader's derivatives trading | | cftcBatch/cftcForm40/contact@nameSuffix |
| 30. | Street Address of Contact for Reporting Trader's Derivatives Trading | Question 2 | Yes | Street Address of the contact person for the reporting trader's derivatives trading | | cftcBatch/cftcForm40/contact@street |
| 31. | Suite Number of Contact for Reporting Trader's Derivatives Trading | Question 2 | Conditional. Required if information available | Suite number of the contact person for the reporting trader's derivatives trading | | cftcBatch/cftcForm40/contact@suite |
| 32. | City of Contact for Reporting Trader's Derivatives Trading | Question 2 | Yes | City of the contact person for the reporting trader's derivatives trading | | cftcBatch/cftcForm40/contact@city |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---|--------------------------------|-----------------|--|---------------------|---|
| 33. | State of Contact for Reporting Trader's Derivatives Trading | Question 2 | Yes | ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters | | cftcBatch/cftcForm40/contact@state |
| 34. | Country of Contact for Reporting Trader's Derivatives Trading | Question 2 | Yes | ISO 3166-1 alpha-2 country code | | cftcBatch/cftcForm40/contact@country |
| 35. | Zip/Postal Code of Contact for Reporting Trader's Derivatives Trading | Question 2 | Yes | Zip Code or postal code of the contact person for the reporting trader's derivatives trading | | cftcBatch/cftcForm40/contact@postalCode |
| 36. | Phone Number of Contact for Reporting Trader's Derivatives Trading | Question 2 | Yes | Phone Number of the contact person for the reporting trader's derivatives trading | | cftcBatch/cftcForm40/contact@telephone |
| 37. | Email Address of Contact for | Question 2 | Yes | Email Address of the contact person for the | | cftcBatch/cftcForm40/contact@email |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|---|--------------------------------|--|--|---------------------|--|
| | Reporting Trader's Derivatives Trading | | | reporting trader's derivatives trading | | |
| 38. | NFA ID of Contact for Reporting Trader's Derivatives Trading | Question 2 | Conditional. Required if information available | The identification number given to the contact by the National Futures Association | | cftcBatch/cftcForm40/contact@NFAIdentifier |
| CONTACT INFORMATION - RISK MANAGEMENT OPERATIONS CONTACT PERSON | | | | | | |
| 39. | Contact for Risk Management Operations of Reporting Trader | Question 3 | Yes | Indicates whether the contact information is regarding the Risk Management Operations of the reporting traders | Y = Yes N = No | cftcBatch/CftcForm40/contact@isRiskManagementPOC |
| 40. | Individual to Contact Regarding Risk Management Operations has same information | Question 3 | Yes | Indicates whether the contact information for risk management operations is the same as the reporting trader | Y = Yes N = No | cftcBatch/CftcForm40/contact@isSameAsReporter |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|--------------------------------|--|--|---------------------|---|
| | as Reporting Trader | | | | | |
| 41. | Last Name of Contact for Reporting Trader's Risk Management Operations | Question 3 | Yes | Surname for reportable contact person | | cftcBatch/cftcForm40/contact@lastName |
| 42. | First Name of Contact for Reporting Trader's Risk Management Operations | Question 3 | Yes | Given or first in order name for reportable contact person | | cftcBatch/cftcForm40/contact@firstName |
| 43. | Middle Name of Contact for Reporting Trader's Risk Management Operations | Question 3 | Conditional. Required if information available | Middle name for reportable contact person | | cftcBatch/cftcForm40/contact@middleName |
| 44. | Name Suffix of Contact for Reporting Trader's Derivatives | Question 3 | Conditional. Required if information available | Suffix for reportable contact person | | cftcBatch/cftcForm40/contact@nameSuffix |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---|--------------------------------|--|--|---------------------|-------------------------------------|
| | Trading | | | | | |
| 45. | Street Address of Contact for Reporting Trader's Risk Management Operations | Question 3 | Yes | Street Address for reportable contact person | | cftcBatch/cftcForm40/contact@street |
| 46. | Suite Number of Contact for Reporting Trader's Risk Management Operations | Question 3 | Conditional. Required if information available | Suite number for reportable contact person | | cftcBatch/cftcForm40/contact@suite |
| 47. | City of Contact for Reporting Trader's Risk Management Operations | Question 3 | Yes | City for a reportable contact person | | cftcBatch/cftcForm40/contact@city |
| 48. | State of Contact for Reporting Trader's | Question 3 | Yes | ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric | | cftcBatch/cftcForm40/contact@state |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|--------------------------------|-----------------|---|---------------------|---|
| | Risk Management Operations | | | characters | | |
| 49. | Country of Contact for Reporting Trader's Risk Management Operations | Question 3 | Yes | ISO 3166-1 alpha-2 country code | | cftcBatch/cftcForm40/contact@country |
| 50. | Zip/Postal Code of Contact for Reporting Trader's Risk Management Operations | Question 3 | Yes | Zip Code or postal code for reportable contact person | | cftcBatch/cftcForm40/contact@postalCode |
| 51. | Phone Number of Contact for Reporting Trader's Risk Management Operations | Question 3 | Yes | Phone Number for reportable contact person | | cftcBatch/cftcForm40/contact@telephone |
| 52. | Email Address of Contact for | Question 3 | Yes | Email Address for reportable contact person | | cftcBatch/cftcForm40/contact@email |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|---|--------------------------------|--|---|---------------------|---|
| | Reporting Trader's Risk Management Operations | | | | | |
| 53. | NFA ID of Contact for Reporting Trader's Risk Management Operations | Question 3 | Conditional. Required if information available | The identification number given to the contact by the National Futures Association | | cftcBatch/cftcForm40/contact@NFAIdentifier |
| CONTACT INFORMATION – INDIVIDUAL RESPONSIBLE FOR INFORMATION ON FORM 40 | | | | | | |
| 54. | Contact for Responsible Individual of Information on Form 40. | Question 4 | Yes | Indicates whether the contact information is regarding the Individual Responsible for information on form40 | Y = Yes N = No | cftcBatch/CftcForm40/contact@isFormInformationPOC |
| 55. | Individual to Contact Regarding Information on Form 40 has same information | Question 4 | Yes | Indicates whether the contact information for information on Form 40 is the same as the reporting trader | Y = Yes N = No | cftcBatch/CftcForm40/contact@isSameAsReporter |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|--------------------------------|--|---|---------------------|---|
| | as Reporting Trader | | | | | |
| 56. | Last Name of Contact for Reporting Trader's Form 40 Verification | Question 4 | Yes | Surname for a natural person contact for Form 40 verification for the reporting trader | | cftcBatch/cftcForm40/contact@lastName |
| 57. | First Name of Contact for Reporting Trader's Form 40 Verification | Question 4 | Yes | Given or first in order name for a natural person contact for Form 40 verification for the reporting trader | | cftcBatch/cftcForm40/contact@firstName |
| 58. | Middle Name of Contact for Reporting Trader's Form 40 Verification | Question 4 | Conditional. Required if information available | Middle name for a natural person contact for Form 40 verification for the reporting trader | | cftcBatch/cftcForm40/contact@middleName |
| 59. | Name Suffix of Contact for Reporting Trader's Form 40 Verification | Question 4 | Conditional. Required if information available | Suffix for a natural person contact for Form 40 verification for the reporting trader | | cftcBatch/cftcForm40/contact@nameSuffix |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---|--------------------------------|--|--|---------------------|--------------------------------------|
| 60. | Street Address of Contact for Reporting Trader's Form 40 Verification | Question 4 | Yes | Street Address of the natural person contact for the reporting trader's Form 40 verification | | cftcBatch/cftcForm40/contact@street |
| 61. | Suite Number of Contact for Reporting Trader's Form 40 Verification | Question 4 | Conditional. Required if information available | Suite number of the natural person contact for the reporting trader's Form 40 verification | | cftcBatch/cftcForm40/contact@suite |
| 62. | City of Contact for Reporting Trader's Form 40 Verification | Question 4 | Yes | City of the natural person contact for the reporting trader's Form 40 verification | | cftcBatch/cftcForm40/contact@city |
| 63. | State of Contact for Reporting Trader's Form 40 Verification | Question 4 | Yes | ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters | | cftcBatch/cftcForm40/contact@state |
| 64. | Country of Contact for Reporting | Question 4 | Yes | ISO 3166-1 alpha-2 country code | | cftcBatch/cftcForm40/cotnact@country |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|--|--------------------------------|--|---|---------------------|--|
| | Trader's Form 40 Verification | | | | | |
| 65. | Zip/Postal Code of Contact for Reporting Trader's Form 40 Verification | Question 4 | Yes | Zip code or postal code of the natural person contact for the reporting trader's Form 40 verification | | cftcBatch/cftcForm40/contact@postalCode |
| 66. | Phone Number of Contact for Reporting Trader's Form 40 Verification | Question 4 | Yes | Phone number of the natural person contact for the reporting trader's Form 40 verification | | cftcBatch/cftcForm40/contact@telephone |
| 67. | Email Address of Contact for Reporting Trader's Form 40 Verification | Question 4 | Yes | Email Address of the natural person contact for the reporting trader's Form 40 verification | | cftcBatch/cftcForm40/contact@email |
| 68. | NFA ID of Contact for Reporting Trader's Form 40 | Question 4 | Conditional. Required if information available | The identification number given to the contact by the National Futures | | cftcBatch/cftcForm40/contact@NFAIdentifier |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|------------------------------------|--------------------------------|---|--|---------------------|--|
| | Verification | | | Association | | |
| OMNIBUS ACCOUNT CARRIER INFORMATION | | | | | | |
| 69. | Customer Omnibus Account Indicator | Question 5 | Yes | Indicates whether the reporting trader has a customer omnibus account with a futures commission merchant, clearing member, or foreign broker | Y = Yes N = No | cftcBatch/cftcForm40@isOmnibusAccount |
| 70. | Name of Omnibus Account Carrier | Question 5 | Conditional. Required if isOmnibusAccount='Y' | For traders that have a customer omnibus account(s), the name of the futures commission merchant, clearing member, or foreign broker carrying the account(s) of the reporting trader | | cftcBatch/cftcForm40/omnibusAccountCarrier@legalEntityName |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---|--------------------------------|---|--|---------------------|--|
| 71. | Futures Commission Merchant Omnibus Carrier Indicator | Question 5 | Conditional. Required if isOmnibusAccount='Y' | Indicates whether the reporting trader has a customer omnibus account with a futures commission merchant | Y = Yes N = No | cftcBatch/cftcForm40/omnibusAccountCarrier@isFCM |
| 72. | Clearing Member Omnibus Carrier Indicator | Question 5 | Conditional. Required if isOmnibusAccount='Y' | Indicates whether the reporting trader has a customer omnibus account with a clearing member | Y = Yes N = No | cftcBatch/cftcForm40/omnibusAccountCarrier@isCM |
| 73. | Foreign Broker Omnibus Carrier Indicator | Question 5 | Conditional. Required if isOmnibusAccount='Y' | Indicates whether the reporting trader has a customer omnibus account with a foreign broker | Y = Yes N = No | cftcBatch/cftcForm40/omnibusAccountCarrier@isFB |
| 74. | Foreign Government Affiliation Indicator | Question 6 | Yes | Indicates whether the reporting trader is directly or indirectly affiliated with a government other than that of the | Y = Yes N = No | cftcBatch/cftcForm40@isForeignAffiliated |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|---|---|--------------------------------|--|--|---------------------|--|
| | | | | United States | | |
| FOREIGN GOVERNMENT AFFILIATION INFORMATION | | | | | | |
| 75. | Foreign Government Name | Question 6 | Conditional. Required if isForeignAffiliated = 'Y' | For reporting traders affiliated with foreign government(s), the name(s) of those foreign governments | | cftcBatch/cftcForm40/foreignAffiliation@countryName |
| 76. | Nature of Foreign Government Affiliation(s) | Question 6 | Conditional. Required if isForeignAffiliated = 'Y' | An explanation of the nature of affiliation(s) between the reporting trader and the foreign governments listed | | cftcBatch/cftcForm40/foreignAffiliation@relationship |
| NON-DOMESTIC ENTITY INFORMATION | | | | | | |
| 77. | Non-Domestic Entity Indicator | Question 7 | Conditional. Required if entityType = 'LE' | Indicates if the reporting trader is organized under the laws of countr(ies) other than the United States | Y = yes N = no | cftcBatch/cftcForm40@isForeignEntity |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|---------------------------|--------------------------------|--|--|---|--|
| 78. | Country of Organization | Question 7 | Conditional. Required if isForeignEntity = 'Y' | ISO 3166-1 alpha-2 country code | | cftcBatch/cftcForm40/foreignLegalRegime@country |
| OWNERSHIP STRUCTURE OF REPORTING TRADER | | | | | | |
| PARENT / 10% OR GREATER OWNER OF THE REPORTING TRADER | | | | | | |
| 79. | Parent or Owner Indicator | Question 8 | Yes, isParentOrOwner = 'Y' | Indicates whether the reporting trader has at least one parent/owner | Y = Has at least one parent or owner | cftcBatch/cftcForm40/relatedEntity@isParentOrOwner |
| 80. | Parent Company | Question 8 | Conditional. Required if isParentOrOwner = 'Y' | Indicates if the parent of the reporting trader is a Parent Company | Y = yes N = no | cftcBatch/cftcForm40/relatedEntity@isParentCompany |
| 81. | Parent Generation | Question 8 | Conditional. Required if isParentOrOwner = 'Y' AND isParentCompany = 'Y' | For each parent of the reporting trader, indicates the hierarchical level in the entity structure where the parent is located. Direct parents of the trader have Generation = 1; | 2 = Parent of a parent 1 = Direct parent of a reporting trader | cftcBatch/cftcForm40/relatedEntity@generation |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|-----------------------------------|--------------------------------|--|--|--|--|
| | | | | parents of a Generation +1 parent (parents of a direct parent) have Generation = 2 and so on. | | |
| 82. | Parent or Owner Entity Type | Question 8 | Conditional. Required if isParentOrOwner = 'Y' | Indicates whether the parent/owner is a legal entity or a natural person | LE = legal entity NP = natural person | cftcBatch/cftcForm40/relatedEntity@entityType |
| IF PARENT/OWNER IS A LEGAL ENTITY | | | | | | |
| 83. | Parent or Owner Legal Entity Name | Question 8 | Conditional. Required if entityType = 'LE' AND isParentOrOwner = 'Y' | The legal entity name of each parent/owner of the reporting trader (if the parent is a legal entity) | | cftcBatch/cftcForm40/relatedEntity@legalEntityName |
| IF PARENT/OWNER IS A NATURAL PERSON | | | | | | |
| 84. | Parent or Owner Last Name | Question 8 | Conditional. Required if entityType = 'NP' AND isParentOrOwner = 'Y' | Surname of the parent/owner of the reporting trader | | cftcBatch/cftcForm40/relatedEntity@lastName |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|--------------------------------|--------------------------------|---|--|---------------------|---|
| 85. | Parent or Owner First Name | Question 8 | Conditional. Required if entityType = 'NP' AND isParentOrOwner = 'Y' | Given or first in order name of the parent/owner of the reporting trader | | cftcBatch/cftcForm40/relatedEntity@firstName |
| 86. | Parent or Owner Middle Name | Question 8 | Conditional. Required if information available AND If entityType = 'NP' AND isParentOrOwner = 'Y' | Middle name of the parent/owner of the reporting trader | | cftcBatch/cftcForm40/relatedEntity@middleName |
| 87. | Parent or Owner Name Suffix | Question 8 | Conditional. Required if information available AND If entityType = 'NP' AND isParentOrOwner = 'Y' | Generational or name suffix of the parent/owner of the reporting trader | | cftcBatch/cftcForm40/relatedEntity@nameSuffix |
| FOR BOTH LEGAL ENTITIES AND NATURAL PERSONS | | | | | | |
| 88. | Parent or Owner Street Address | Question 8 | Conditional. Required if isParentOrOwner = 'Y' | Street address of each parent/owner of the reporting trader | | cftcBatch/cftcForm40/relatedEntity@street |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-----|---------------------------------|--------------------------------|--|---|---------------------|---|
| 89. | Parent or Owner Suite Number | Question 8 | Conditional. Required if information available AND isParentOrOwner = 'Y' | Suite number of each parent/owner of the reporting trader | | cftcBatch/cftcForm40/relatedEntity@suite |
| 90. | Parent or Owner City | Question 8 | Conditional. Required if isParentOrOwner = 'Y' | City of each parent/owner of the reporting trader | | cftcBatch/cftcForm40/relatedEntity@city |
| 91. | Parent or Owner State | Question 8 | Conditional. Required if isParentOrOwner = 'Y' | ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters | | cftcBatch/cftcForm40/relatedEntity@state |
| 92. | Parent or Owner Country | Question 8 | Conditional. Required if isParentOrOwner = 'Y' | ISO 3166-1 alpha-2 country code | | cftcBatch/cftcForm40/relatedEntity@country |
| 93. | Parent or Owner Zip/Postal Code | Question 8 | Conditional. Required if isParentOrOwner = 'Y' | Zip code or postal code of each parent/owner of the reporting trader | | cftcBatch/cftcForm40/relatedEntity@postalCode |
| 94. | Parent or Owner Phone Number | Question 8 | Conditional. Required if isParentOrOwner = 'Y' | Phone Number of each parent/owner of the reporting | | cftcBatch/cftcForm40/relatedEntity@telephone |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|------------|---|--------------------------------|--|---|---------------------|--|
| | | | | trader | | |
| 95. | Parent or Owner Website | Question 8 | Conditional. Required if information available | Website of each parent/owner of the reporting trader | | cftcBatch/cftcForm40/relatedEntity@website |
| 96. | Parent or Owner Email Address | Question 8 | Conditional. Required if isParentOrOwner = 'Y' | Email address of each parent/owner of the reporting trader | | cftcBatch/cftcForm40/relatedEntity@email |
| 97. | Parent or Owner NFA ID | Question 8 | Conditional. Required if information available AND isParentOrOwner = 'Y' | The identification number given to the parent/owner of the reporting trader by the National Futures Association | | cftcBatch/cftcForm40/relatedEntity@NFAIdentifier |
| 98. | Parent or Owner Legal Entity Identifier | Question 8 | Conditional. Required if information available AND isParentOrOwner = 'Y' | The legal entity identifier (LEI) assigned to the parent/owner of the reporting trader by the LEI issuer | | cftcBatch/cftcForm40/relatedEntity@legalEntityIdentifier |
| 99. | 10% Owner | Question 8 | Conditional. Required if isParentOrOwner | Indicates if the parent of the reporting trader | Y = yes N = no | cftcBatch/cftcForm40/relatedEntity@isPercent_10 |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|-------------------------------------|--------------------------------|---|--|---------------------|--|
| | | | =‘Y’ | is a 10% beneficial owner | | |
| IF REPORTING TRADER IS A COMMODITY POOL | | | | | | |
| 100. | Commodity Pool Indicator | Question 8i-8iii | Conditional. Required if isParentOrOwner =‘Y’ AND isCommodityPool =‘Y’ | For each parent/owner of the reporting trader that is a limited partner, shareholder, or other similar type of pool participant, indicates if the reported party is a commodity pool | Y = Yes N = No | cftcBatch/cftcForm40/relatedEntity@isCommodityPool |
| 101. | Parent or Owner Principal Indicator | Question 8i | Conditional. Required if isParentOrOwner =‘Y’ AND isCommodityPool =‘Y’ | For each parent/owner of the reporting trader that is a limited partner, shareholder, or other similar type of pool participant, indicates if the reported party is | Y = Yes N = No | cftcBatch/cftcForm40/relatedEntity@isPrincipal |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|---|--------------------------------|--|--|---------------------|--|
| | | | | a principal of the operator of the commodity pool | | |
| 102. | Parent or Owner Affiliate Indicator | Question 8i | Conditional. Required if isParentOrOwner = 'Y' AND isCommodityPool = 'Y' | For each parent/owner of the reporting trader that is a limited partner, shareholder, or other similar type of pool participant, indicates if the reported party is an affiliate of the operator of the commodity pool | Y = yes N = no | cftcBatch/cftcForm40/relatedEntity@isAffiliate |
| 103. | Parent or Owner Commodity Pool Operator Indicator | Question 8ii | Conditional. Required if isParentOrOwner = 'Y' AND isCommodityPool = 'Y' | For each parent/owner of the reporting trader that is a limited partner, shareholder, or other similar type of pool participant, indicates if the reported party is also a | Y = Yes N = No | cftcBatch/cftcForm40/relatedEntity@isCommodityPoolOperator |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|---|-------------------------|--------------------------------|--|--|---------------------|---|
| | | | | commodity pool operator of the commodity pool | | |
| 104. | 25% Ownership Indicator | Question 8iii | Conditional. Required if isParentOrOwner = 'Y' AND isCommodityPool = 'Y' | For each parent/owner of the reporting trader that is a limited partner, shareholder, or other similar type of pool participant and where the operator of the commodity pool is exempt from registration under §4.13 of the Commission's regulations, indicates if the reported party has an ownership or equity interest of 25 percent or greater in the commodity pool | Y = Yes N = No | cftcBatch/cftcForm40/relatedEntity@isPercent_25 |
| SUBSIDIARY OF THE REPORTING TRADER/PERSONS IN WHICH REPORTING TRADER HAS 10% OR GREATER OWNERSHIP INTEREST | | | | | | |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|-------------------------------|--------------------------------|--|---|--|--|
| 105. | Subsidiary or Owned Indicator | Question 9 | Yes, isSubsidiaryOrOwned = 'Y' | Indicates whether the reporting trader has at least one subsidiary and, separately, all persons in which the reporting trader has a 10 percent or greater ownership interest | Y = Yes N = No | cftcBatch/cftcForm40/relatedEntity@isSubsidiaryOrOwned |
| 106. | Subsidiary Company | Question 9 | Conditional. Required if isSubsidiaryOrOwned = 'Y' | Indicates if the reported party is a subsidiary of the reporting trader | Y = Yes N = No | cftcBatch/cftcForm40/relatedEntity@isSubsidiaryCompany |
| 107. | Subsidiary Generation | Question 9 | Conditional. Required if isSubsidiaryOrOwned = 'Y' AND isSubsidiaryCompany = 'Y' | For each subsidiary entity of the reporting trader, indicates the hierarchical level in the entity structure where the subsidiary entity is located. Direct subsidiaries of the trader have | -2 = Sub of a sub -1 = Direct sub of a reporting trader | cftcBatch/cftcForm40/relatedEntity@generation |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|--------------------------------------|--------------------------------|---|--|--|--|
| | | | | Generation = -1; subsidiaries of a Generation -1 parent (subs of a sub) have Generation = - 2 and so on. | | |
| 108. | Subsidiary or Owned Type Indicator | Question 9 | Conditional. Required if isSubsidiaryOrOwned = 'Y' | For each reported party, indicates if the reported party is a natural person or a legal entity | LE = Legal Entity NP = Natural Person | cftcBatch/cftcForm40/relatedEntity@entityType |
| IF SUBSIDIARY OR OWNED ENTITY IS A LEGAL ENTITY | | | | | | |
| 109. | Subsidiary or Owned Entity Name | Question 9 | Conditional Required if entityType = 'LE' AND isSubsidiaryOrOwned = 'Y' | Legal name of each subsidiary/owned entity of the reporting trader | | cftcBatch/cftcForm40/relatedEntity@legalEntityName |
| IF SUBSIDIARY OR OWNED ENTITY IS A NATURAL PERSON | | | | | | |
| 110. | Subsidiary or Owned Entity Last Name | Question 9 | Conditional Required if entityType = 'NP' AND isSubsidiaryOrOwned | Surname of each subsidiary/owned entity of the reporting trader | | cftcBatch/cftcForm40/relatedEntity@lastName |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|---|--------------------------------|---|--|---------------------|---|
| | | | wned = 'Y' | | | |
| 111. | Subsidiary or Owned Entity First Name | Question 9 | Conditional Required if entityType = 'NP' AND isSubsidiaryOrOwned = 'Y' | Given or first in order name of each subsidiary/owned entity of the reporting trader | | cftcBatch/cftcForm40/relatedEntity@firstName |
| 112. | Subsidiary or Owned Entity Middle Name | Question 9 | Conditional Required if available AND entityType = 'NP' AND isSubsidiaryOrOwned = 'Y' | Middle name of each subsidiary/owned entity of the reporting trader | | cftcBatch/cftcForm40/relatedEntity@middleName |
| 113. | Subsidiary or Owned Entity Name Suffix | Question 9 | Conditional Required if available AND entityType = 'NP' AND isSubsidiaryOrOwned = 'Y' | Generational or name suffix of each subsidiary/owned entity of the reporting trader | | cftcBatch/cftcForm40/relatedEntity@nameSuffix |
| FOR BOTH LEGAL ENTITIES AND NATURAL PERSONS | | | | | | |
| 114. | Subsidiary or Owned Entity Street Address | Question 9 | Conditional. Required if isSubsidiaryOrOwned = 'Y' | Street address of each subsidiary/owned entity of the | | cftcBatch/cftcForm40/relatedEntity@street |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|--|--------------------------------|--|---|---------------------|---|
| | | | | reporting trader | | |
| 115. | Subsidiary or Owned Entity Suite Number | Question 9 | Conditional. Required if isSubsidiaryOrOwned = 'Y' | Suite number of each subsidiary/owned entity of the reporting trader | | cftcBatch/cftcForm40/relatedEntity@suite |
| 116. | Subsidiary or Owned Entity City | Question 9 | Conditional. Required if isSubsidiaryOrOwned = 'Y' | City of each subsidiary/owned entity of the reporting trader | | cftcBatch/cftcForm40/relatedEntity@city |
| 117. | Subsidiary or Owned Entity State | Question 9 | Conditional. Required if isSubsidiaryOrOwned = 'Y' | ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters | | cftcBatch/cftcForm40/relatedEntity@state |
| 118. | Subsidiary or Owned Entity Country | Question 9 | Conditional. Required if isSubsidiaryOrOwned = 'Y' | ISO 3166-1 alpha-2 country code | | cftcBatch/cftcForm40/relatedEntity@country |
| 119. | Subsidiary or Owned Entity Zip/Postal Code | Question 9 | Conditional. Required if isSubsidiaryOrOwned = 'Y' | Zip code or postal code of each subsidiary/owned entity of the reporting trader | | cftcBatch/cftcForm40/relatedEntity@postalCode |
| 120. | Subsidiary or Owned | Question 9 | Conditional. Required if | Phone number of each | | cftcBatch/cftcForm40/relatedEntity@telephone |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|--|--------------------------------|---|--|---------------------|--|
| | Entity Phone Number | | isSubsidiaryOrOwned = 'Y' | subsidiary/owned entity of the reporting trader | | |
| 121. | Subsidiary or Owned Entity Website | Question 9 | Conditional. Required if information available AND isSubsidiaryOrOwned = 'Y' | Website of each subsidiary/owned entity of the reporting trader | | cftcBatch/cftcForm40/relatedEntity@website |
| 122. | Subsidiary or Owned Entity Email Address | Question 9 | Conditional. Required if isSubsidiaryOrOwned = 'Y' | Email address of each subsidiary/owned entity of the reporting trader | | cftcBatch/cftcForm40/relatedEntity@email |
| 123. | Subsidiary or Owned Entity NFA ID | Question 9 | Conditional. Required if information available AND If entitytype = 'LE' AND isSubsidiaryOrOwned = 'Y' | The identification number given to the subsidiary/owned entity by the National Futures Association | | cftcBatch/cftcForm40/relatedEntity@NFAIdentifier |
| 124. | Subsidiary or Owned Entity Legal Entity Identifier | Question 9 | Conditional. Required if information available AND If entitytype = 'LE' AND isSubsidiaryOrOwned = 'Y' | The legal entity identifier (LEI) assigned to the subsidiary/owned entity by the LEI issuer | | cftcBatch/cftcForm40/relatedEntity@legalEntityIdentifier |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|--|--------------------------------|--|---|---------------------|---|
| | | | wned = 'Y' | | | |
| 125. | 10% Owned | Question 9 | Conditional. Required if isSubsidiaryOrOwned = 'Y' | Indicates if the reported party is a person in which the reporting trader has a 10% or greater ownership interest | Y = Yes N = No | cftcBatch/cftcForm40/relatedEntity@isPercent_10 |
| 126. | Subsidiary Principal/Affiliate Indicator | Question 9i | Conditional. Required if isSubsidiaryOrOwned = 'Y' | For each subsidiary/owned entity that is a commodity pool and for which the reporting trader is a limited partner, shareholder, or other pool participant, indicates if the trader is a principal of the operator of the commodity pool | Y = Yes N = No | cftcBatch/cftcForm40/relatedEntity@isPrincipal |
| 127. | Subsidiary Affiliate Indicator | Question 9i | Conditional. Required if isSubsidiaryOrOwned = 'Y' | For each subsidiary/owned entity that is a | Y = Yes N = No | cftcBatch/cftcForm40/relatedEntity@isAffiliate |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|--|--------------------------------|--|--|---|--|
| | | | wned = 'Y' | commodity pool and for which the reporting trader is a limited partner, shareholder, or other pool participant, indicates if the trader is an affiliate of the operator of the commodity pool | | |
| 128. | Subsidiary Commodity Pool Operator Indicator | Question 9ii | Conditional. Required if isSubsidiaryOrOwned = 'Y' | For each reported party that is a commodity pool and for which the trader is a limited partner, shareholder, or other pool participant, indicates if the trader is the commodity pool operator | Y = Yes, operator N = No, not the operator | cftcBatch/cftcForm40/relatedEntity@isCommodityPoolOperator |
| 129. | Subsidiary 25% Ownership | Question 9iii | Conditional. Required if isSubsidiaryOrOwned = 'Y' | For each reported party that is a commodity pool | Y = 25% or greater interest N = not 25% or | cftcBatch/cftcForm40/relatedEntity@isPercent_25 |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|---|----------------------|--------------------------------|-----------------|---|---------------------|--|
| | Indicator | | wned = 'Y' | and for which the trader is a limited partner, shareholder, or other pool participant, and for which the operator of the commodity pool is exempt from registration under §4.13 of the Commission's regulations, indicates if the trader has an ownership or equity interest of 25 percent or greater in the commodity pool | greater interest | |
| CONTROL OF TRADING - PERSONS OTHER THAN REPORTING TRADER | | | | | | |
| 130. | Controller Indicator | Question 10 | Yes | List all persons outside of the reporting trader that control some or all of the derivatives | Y=Yes N=No | cftcBatch/cftcForm40/relatedEntity@isAlternateTradeControl |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|--|--------------------------------|--|--|--|--|
| | | | | trading of the reporting trader – an “alternate trade controller” | | |
| 131. | Alternate Trade Controller Type Indicator | Question 10 | Conditional. Required if isAlternateTradeControl = ‘Y’ | For each alternate trade controller, indicates if the person is a natural person or legal entity | LE = Legal Entity NP = Natural Person | cftcBatch/cftcForm40/relatedEntity@entityType |
| IF ALTERNATE TRADE CONTROLLER IS A LEGAL ENTITY | | | | | | |
| 132. | Alternate Trade Controller Legal Entity Name | Question 10 | Conditional. Required if entityType = ‘LE’ AND isAlternateTradeControl = ‘Y’ | Legal name of each alternate trade controller | | cftcBatch/cftcForm40/relatedEntity@legalEntityName |
| IF ALTERNATE TRADE CONTROLLER IS A NATURAL PERSON | | | | | | |
| 133. | Alternate Trade Controller Last Name | Question 10 | Conditional. Required If entityType = ‘NP’ AND isAlternateTradeControl = ‘Y’ | Surname of each alternate trade controller | | cftcBatch/cftcForm40/relatedEntity@lastName |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|---|--------------------------------|--|---|---------------------|---|
| 134. | Alternate Trade Controller First Name | Question 10 | Conditional, If entityType = 'NP' AND isAlternateTradeControl = 'Y' | Given or first in order name of each alternate trade controller | | cftcBatch/cftcForm40/relatedEntity@firstName |
| 135. | Alternate Trade Controller Middle Name | Question 10 | Conditional (not required), If entityType = 'NP' AND isAlternateTradeControl = 'Y' | Middle name of each alternate trade controller | | cftcBatch/cftcForm40/relatedEntity@middleName |
| 136. | Alternate Trade Controller Name Suffix | Question 10 | Conditional (not required), If entityType = 'NP' AND isAlternateTradeControl = 'Y' | Generational or name suffix of each alternate trade controller | | cftcBatch/cftcForm40/relatedEntity@nameSuffix |
| FOR BOTH LEGAL ENTITIES AND NATURAL PERSONS | | | | | | |
| 137. | Alternate Trade Controller Street Address | Question 10 | Conditional. Required If isAlternateTradeControl = 'Y' | Street address of each alternate trade controller | | cftcBatch/cftcForm40/relatedEntity@street |
| 138. | Alternate Trade Controller Suite Number | Question 10 | Conditional. Required If isAlternateTradeControl = 'Y' | Suite number of each alternate trade controller | | cftcBatch/cftcForm40/relatedEntity@suite |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|--|--------------------------------|---|---|---------------------|---|
| 139. | Alternate Trade Controller City | Question 10 | Conditional. Required If isAlternateTrade Control = 'Y' | City of each alternate trade controller | | cftcBatch/cftcForm40/relatedEntity@city |
| 140. | Alternate Trade Controller State | Question 10 | Conditional. Required If isAlternateTrade Control = 'Y' | ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters | | cftcBatch/cftcForm40/relatedEntity@state |
| 141. | Alternate Trade Controller Country | Question 10 | Conditional. Required If isAlternateTrade Control = 'Y' | ISO 3166-1 alpha-2 country code | | cftcBatch/cftcForm40/relatedEntity@country |
| 142. | Alternate Trade Controller Zip/Postal Code | Question 10 | Conditional. Required If isAlternateTrade Control = 'Y' | Zip code or postal code of each alternate trade controller | | cftcBatch/cftcForm40/relatedEntity@postalCode |
| 143. | Alternate Trade Controller Phone Number | Question 10 | Conditional. Required If isAlternateTrade Control = 'Y' | Phone number of each alternate trade controller | | cftcBatch/cftcForm40/relatedEntity@telephone |
| 144. | Alternate Trade Controller Website | Question 10 | Conditional. Required If information available AND | Website of each alternate trade controller | | cftcBatch/cftcForm40/relatedEntity@website |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|--|--------------------------------|--|---|---------------------|--|
| | | | isAlternateTradeControl = 'Y' | | | |
| 145. | Alternate Trade Controller Email Address | Question 10 | Conditional. Required if isAlternateTradeControl = 'Y' | Email address of each alternate trade controller | | cftcBatch/cftcForm40/relatedEntity@email |
| 146. | Alternate Trade Controller NFA ID | Question 10 | Conditional. Required if information available AND isAlternateTradeControl = 'Y' | The identification number given to the alternate trade controller by the National Futures Association | | cftcBatch/cftcForm40/relatedEntity@NFAIdentifier |
| 147. | Alternate Trade Controller Legal Entity Identifier | Question 10 | Conditional. Required if information available AND isAlternateTradeControl = 'Y' | The legal entity identifier (LEI) assigned to the alternate trade controller by the LEI issuer | | cftcBatch/cftcForm40/relatedEntity@legalEntityIdentifier |
| 148. | Alternate Trade Controller Some/All Indicator | Question 10 | Conditional. Required If isAlternateTradeControl = 'Y' | Indicates if the alternate trade controller controls some or all of the derivatives trading of the reporting trader | S = Some A = All | cftcBatch/cftcForm40/relatedEntity@toWhatDegree |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|-----------------------------|-------------------------|--|---|--|--|
| PERSONS FOR WHICH REPORTING TRADER CONTROLS TRADING | | | | | | |
| 149. | Controlee Indicator | Question 11 | Yes | List all persons for which the reporting trader controls some or all of the derivatives trading (a "controlee") | Y=Yes N=No | cftcBatch/cftcForm40/relatedEntity@isTradeControlFor |
| 150. | Controlee Type Indicator | Question 11 | Conditional. Required if isTradeControlFor='Y' | For each controlee, indicates whether the person is a legal entity or natural person | LE = Legal Entity NP = Natural Person | cftcBatch/cftcForm40/relatedEntity@entityType |
| IF CONTROLEE IS A LEGAL ENTITY | | | | | | |
| 151. | Controlee Legal Entity Name | Question 11 | Conditional. Required if entityType = 'LE' AND isTradeControlFor='Y' | Legal name of each controlee | | cftcBatch/cftcForm40/relatedEntity@legalEntityName |
| IF CONTROLEE IS A NATURAL PERSON | | | | | | |
| 152. | Controlee Last Name | Question 11 | Conditional. Required if | Surname of each controlee | | cftcBatch/cftcForm40/relatedEntity@lastName |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|-----------------------|--------------------------------|--|---|---------------------|---|
| | | | entityType = 'NP' AND isTradeControlFor='Y' | | | |
| 153. | Controlee First Name | Question 11 | Conditional. Required if entityType = 'NP' AND isTradeControlFor='Y' | Given or first in order name of each controlee | | cftcBatch/cftcForm40/relatedEntity@firstName |
| 154. | Controlee Middle Name | Question 11 | Conditional. Required if information available AND entityType = 'NP' AND isTradeControlFor='Y' | Middle name of each controlee | | cftcBatch/cftcForm40/relatedEntity@middleName |
| 155. | Controlee Name Suffix | Question 11 | Conditional. Required if information available AND entityType = 'NP' AND isTradeControlFor='Y' | Generational or name suffix of each controlee | | cftcBatch/cftcForm40/relatedEntity@nameSuffix |
| FOR BOTH LEGAL ENTITIES AND NATURAL PERSONS | | | | | | |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|---------------------------|--------------------------------|--|---|---------------------|---|
| 156. | Controlee Street Address | Question 11 | Conditional. Required if isTradeControlFor='Y' | Street address of each controlee | | cftcBatch/cftcForm40/relatedEntity@street |
| 157. | Controlee Suite Number | Question 11 | Conditional. Required if information available AND isTradeControlFor='Y' | Suite number of each controlee | | cftcBatch/cftcForm40/relatedEntity@suite |
| 158. | Controlee City | Question 11 | Conditional. Required if isTradeControlFor='Y' | City of each controlee | | cftcBatch/cftcForm40/relatedEntity@city |
| 159. | Controlee State | Question 11 | Conditional. Required if isTradeControlFor='Y' | ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters | | cftcBatch/cftcForm40/relatedEntity@state |
| 160. | Controlee Country | Question 11 | Conditional. Required if isTradeControlFor='Y' | ISO 3166-1 alpha-2 country code | | cftcBatch/cftcForm40/relatedEntity@country |
| 161. | Controlee Zip/Postal Code | Question 11 | Conditional. Required if isTradeControlFor='Y' | Zip code or postal code of each controlee | | cftcBatch/cftcForm40/relatedEntity@postalCode |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|-----------------------------------|--------------------------------|--|--|---------------------|--|
| 162. | Controlee Phone Number | Question 11 | Conditional. Required if isTradeControlFor='Y' | Phone number of each controlee | | cftcBatch/cftcForm40/relatedEntity@telephone |
| 163. | Controlee Website | Question 11 | Conditional. Required if Information available AND isTradeControlFor='Y' | Website of each controlee | | cftcBatch/cftcForm40/relatedEntity@website |
| 164. | Controlee Email Address | Question 11 | Conditional. Required if isTradeControlFor='Y' | Email address of each controlee | | cftcBatch/cftcForm40/relatedEntity@email |
| 165. | Controlee NFA ID | Question 11 | Conditional. Required If Information Available AND isTradeControlFor='Y' | The identification number given to the controlee by the National Futures Association | | cftcBatch/cftcForm40/relatedEntity@NFAIdentifier |
| 166. | Controlee Legal Entity Identifier | Question 11 | Conditional. Required If Information Available AND isTradeControlFor='Y' | The legal entity identifier (LEI) assigned to the controlee by the LEI issuer | | cftcBatch/cftcForm40/relatedEntity@legalEntityIdentifier |
| 167. | Controlee Some/All | Question 11 | Conditional. Required | Indicates if the reporting trader | S = Some A = All | cftcBatch/cftcForm40/relatedEntity@toWhatDegree |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|---|--------------------------------------|--------------------------------|--|--|--|---|
| | Indicator | | If isTradeControlF or='Y' | controls some or all of the derivatives trading of the controlee | | |
| OTHER PERSON THAT INFLUENCES OR EXERCISES AUTHORITY OVER TRADING | | | | | | |
| 168. | Influencer/ Authority Indicator | Question 12 | Yes | List any other person(s) that directly or indirectly influence, or exercise authority over, some or all of the trading of the reporting trader, but who do not exercise "control" as defined in the OCR Final Rule (a "Reportable Influencer") | Y=Yes N=No | cftcBatch/cftcForm40/relatedEntity@isOtherInfluence |
| 169. | Influencer/ Authority Type Indicator | Question 12 | Conditional. Required if isOtherInfluence ='Y' | For each reportable influencer, indicates whether the person is | LE = Legal Entity NP = Natural Person | cftcBatch/cftcForm40/relatedEntity@entityType |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|---|--|--------------------------------|---|--|---------------------|--|
| | | | | legal entity or natural person | | |
| IF REPORTABLE INFLUENCER IS A LEGAL ENTITY | | | | | | |
| 170. | Influencer/Authority Legal Entity Name | Question 12 | Conditional. Required if entityType='LE' AND isOtherInfluence='Y' | Legal name of each reportable influencer | | cftcBatch/cftcForm40/relatedEntity@legalEntityName |
| IF REPORTABLE INFLUENCER IS A NATURAL PERSON | | | | | | |
| 171. | Influencer/Authority Last Name | Question 12 | Conditional. Required if entityType='NP' AND isOtherInfluence='Y' | Surname of each reportable influencer | | cftcBatch/cftcForm40/relatedEntity@lastName |
| 172. | Influencer/Authority First Name | Question 12 | Conditional. Required if entityType='NP' AND isOtherInfluence='Y' | Given or first in order name of each reportable influencer | | cftcBatch/cftcForm40/relatedEntity@firstName |
| 173. | Influencer/Authority Middle Name | Question 12 | Conditional. Required If Information Available AND | Middle name of each reportable influencer | | cftcBatch/cftcForm40/relatedEntity@middleName |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|-------------------------------------|--------------------------------|---|---|---------------------|---|
| | | | entityType='NP' AND isOtherInfluence='Y' | | | |
| 174. | Influencer/Authority Name Suffix | Question 12 | Conditional. Required If Information Available AND entityType='NP' AND isOtherInfluence='Y' | Generational or name suffix of each reportable influencer | | cftcBatch/cftcForm40/relatedEntity@nameSuffix |
| FOR BOTH LEGAL ENTITIES AND NATURAL PERSONS | | | | | | |
| 175. | Influencer/Authority Street Address | Question 12 | Conditional. Required if isOtherInfluence='Y' | Street address of each reportable influencer | | cftcBatch/cftcForm40/relatedEntity@street |
| 176. | Influencer/Authority Suite Number | Question 12 | Conditional. Required If Information Available AND isOtherInfluence='Y' | Suite number of each reportable influencer | | cftcBatch/cftcForm40/relatedEntity@suite |
| 177. | Influencer/Authority City | Question 12 | Conditional. Required if isOtherInfluence='Y' | City of each reportable influencer | | cftcBatch/cftcForm40/relatedEntity@city |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|---------------------------------------|--------------------------------|--|---|---------------------|---|
| 178. | Influencer/A uthority State | Question 12 | Conditional. Required if isOtherInfluence =‘Y’ | ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters | | cftcBatch/cftcForm40/relatedEntity@state |
| 179. | Influencer/A uthority Country | Question 12 | Conditional. Required if isOtherInfluence =‘Y’ | ISO 3166-1 alpha-2 country code | | cftcBatch/cftcForm40/relatedEntity@country |
| 180. | Influencer/A uthority Zip/Postal Code | Question 12 | Conditional. Required if isOtherInfluence =‘Y’ | Zip code or postal code of each reportable influencer | | cftcBatch/cftcForm40/relatedEntity@postalCode |
| 181. | Influencer/A uthority Phone Number | Question 12 | Conditional. Required if isOtherInfluence =‘Y’ | Phone number of each reportable influencer | | cftcBatch/cftcForm40/relatedEntity@telephone |
| 182. | Influencer/A uthority Website | Question 12 | Conditional. Required if Information Available AND isOtherInfluence =‘Y’ | URL for the website of each reportable influencer | | cftcBatch/cftcForm40/relatedEntity@website |
| 183. | Influencer/A uthority Email Address | Question 12 | Conditional. Required if isOtherInfluence =‘Y’ | Email address of each reportable influencer | | cftcBatch/cftcForm40/relatedEntity@email |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|---|---|--------------------------------|--|---|---------------------|--|
| 184. | Influencer/A uthority NFA ID | Question 12 | Conditional. Required If Information available AND isOtherInfluence =‘Y’ | The identification number given to the influencer/author ity by the National Futures Association | | cftcBatch/cftcForm40/relatedEntity@NFAIdentifier |
| 185. | Influencer/A uthority Legal Entity Identifier | Question 12 | Conditional. Required If Information available AND isOtherInfluence =‘Y’ | The legal entity identifier (LEI) assigned to the influencer/author ity by the LEI issuer | | cftcBatch/cftcForm40/relatedEntity@legalEntityIdentifier |
| 186. | Influencer/A uthority Some/All Indicator | Question 12 | Conditional. Required If isOtherInfluence =‘Y’ | Indicates if the identified party influences or exercises authority over some or all of the derivatives trading of the reporting trader | S = Some A = All | cftcBatch/cftcForm40/relatedEntity@toWhatDegree |
| EXPRESS OR IMPLIED AGREEMENT - CONTACT INFORMATION | | | | | | |
| 187. | Derivatives Trading Agreement Indicator | Question 13 | Yes | Indicates if some or all of the derivatives trading of the | Y = Yes N = No | cftcBatch/cftcForm40/relatedEntity@isOtherAgreement |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|------------------------------------|--------------------------------|---|---|--|--|
| | | | | reporting trader is subject to an express or implied agreement/understanding with any person(s) not already listed. | | |
| 188. | Reportable Party Entity Type | Question 13 | Conditional. Required if isOtherAgreement='Y' | For each reportable party, indicates such person is a legal entity or natural person | LE = Legal Entity NP = Natural Person | cftcBatch/cftcForm40/relatedEntity@entityType |
| IF REPORTABLE PARTY IS A LEGAL ENTITY | | | | | | |
| 189. | Reportable Party Legal Entity Name | Question 13 | Conditional. Required if entityType='LE' AND isOtherAgreement='Y' | Legal name of each reportable party | | cftcBatch/cftcForm40/relatedEntity@legalEntityName |
| IF REPORTABLE PARTY IS A NATURAL PERSON | | | | | | |
| 190. | Reportable Party Last Name | Question 13 | Conditional. Required if entityType='NP' AND | Surname of each reportable party | | cftcBatch/cftcForm40/relatedEntity@lastName |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|--|------------------------------|--------------------------------|---|---|---------------------|---|
| | | | isOtherAgreement='Y' | | | |
| 191. | Reportable Party First Name | Question 13 | Conditional. Required if entityType='NP' AND isOtherAgreement='Y' | Given or first in order name of each reportable party | | cftcBatch/cftcForm40/relatedEntity@firstName |
| 192. | Reportable Party Middle Name | Question 13 | Conditional. Required If Information Available AND entityType='NP' AND isOtherAgreement='Y' | Middle name of each reportable party | | cftcBatch/cftcForm40/relatedEntity@middleName |
| 193. | Reportable Party Name Suffix | Question 13 | Conditional. Required If Information Available AND entityType='NP' AND isOtherAgreement='Y' | Generational or name suffix of each reportable party | | cftcBatch/cftcForm40/relatedEntity@nameSuffix |
| FOR BOTH LEGAL ENTITIES AND NATURAL PERSONS | | | | | | |
| 194. | Reportable Party Street | Question 13 | Conditional. Required if | Street address of each reportable | | cftcBatch/cftcForm40/relatedEntity@street |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|----------------------------------|--------------------------------|---|---|---------------------|---|
| | Address | | isOtherAgreement='Y' | party | | |
| 195. | Reportable Party Suite Number | Question 13 | Conditional. Required If Information Available AND isOtherAgreement='Y' | Suite number of each reportable party | | cftcBatch/cftcForm40/relatedEntity@suite |
| 196. | Reportable Party City | Question 13 | Conditional. Required if isOtherAgreement='Y' | City of each reportable party | | cftcBatch/cftcForm40/relatedEntity@city |
| 197. | Reportable Party State | Question 13 | Conditional. Required if isOtherAgreement='Y' | ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters | | cftcBatch/cftcForm40/relatedEntity@state |
| 198. | Reportable Party Country | Question 13 | Conditional. Required if isOtherAgreement='Y' | ISO 3166-1 alpha-2 country code | | cftcBatch/cftcForm40/relatedEntity@country |
| 199. | Reportable Party Zip/Postal Code | Question 13 | Conditional. Required if isOtherAgreement='Y' | Zip Code or postal code of each reportable party | | cftcBatch/cftcForm40/relatedEntity@postalCode |
| 200. | Reportable Party Phone Number | Question 13 | Conditional. Required if isOtherAgreement='Y' | Phone number of each reportable party | | cftcBatch/cftcForm40/relatedEntity@telephone |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|--|--------------------------------|---|---|---------------------|--|
| | | | nt='Y' | | | |
| 201. | Reportable Party Website | Question 13 | Conditional. Required if Information Available AND isOtherAgreement='Y' | URL for the website of each reportable party | | cftcBatch/cftcForm40/relatedEntity@website |
| 202. | Reportable Party Email Address | Question 13 | Conditional. Required if isOtherAgreement='Y' | Email address of each reportable party | | cftcBatch/cftcForm40/relatedEntity@email |
| 203. | Reportable Party NFA ID | Question 13 | Conditional. Required if Information available isOtherAgreement='Y' | The identification number given to the reportable party by the National Futures Association | | cftcBatch/cftcForm40/relatedEntity@NFAIdentifier |
| 204. | Reportable Party Legal Entity Identifier | Question 13 | Conditional. Required if Information available isOtherAgreement='Y' | The legal entity identifier (LEI) assigned to the reportable party by the LEI issuer | | cftcBatch/cftcForm40/relatedEntity@legalEntityIdentifier |
| 205. | Reportable Party Some/All Indicator | Question 13 | Conditional. Required if isOtherAgreement='Y' | Indicates if some or all of the reporting trader's derivatives | S = Some A = All | cftcBatch/cftcForm40/relatedEntity@toWhatDegree |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|---|---|--------------------------------|-----------------|---|---------------------|--|
| | | | | trading is subject to an agreement or understanding with the reportable party | | |
| THE FOLLOWING FORM 40 QUESTIONS REFERENCE DEFINITIONS AND SUPPLEMENTAL LISTS THAT APPEAR IN THE FORM 40 ATTACHED AS AN APPENDIX TO THE OCR FINAL RULE²² | | | | | | |
| 206. | Commodity Index Trading Indicator (Paragraph A) | Question 14i | Yes | Indicates if the reporting trader is engaged in Commodity Index Trading as defined in Paragraph A of the CIT definition | Y = Yes N = No | cftcBatch/cftcForm40@isCommodityIndexTrader_investor |
| 207. | Commodity Index Trading Indicator (Paragraph B) | Question 14ii | Yes | Indicates if the reporting trader is engaged in Commodity Index Trading as defined in Paragraph B of | Y = Yes N = No | cftcBatch/cftcForm40@isCommodityIndexTrader_manager |

²² Reporting parties should visit this link to view the OCR Final Rule on the Federal Register:

<https://www.federalregister.gov/articles/2013/11/18/2013-26789/ownership-and-control-reports-forms-102102s-4040s-and-71>

Visit this link to view a pdf copy of the OCR Final Rule: <http://www.cftc.gov/ucm/groups/public/@lrfederalregister/documents/file/2013-26789a.pdf>

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|-----------------------------------|--------------------------------|---|---|-----------------------|---|
| | | | | the CIT definition | | |
| 208. | CIT Long/Short Exposure Indicator | Question 14iia | Conditional. Required if isCommodityIndexTrader_manager = 'Y' | Indicates if the reporting trader [that is engaged in Commodity Index Trading as defined in Paragraph B and with respect to commodities in Supplemental List II] is pursuing aggregate long or short exposure with respect to such commodities or commodity groups. It is not necessary to respond to this question with respect to CIT that tracks the performance of multiple unrelated | L = Long S = Short | cftcBatch/cftcForm40@commodityIndexExposure |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|------------------------------------|--------------------------------|--|---|---------------------|---|
| | | | | commodities or commodity groups (e.g., an investment in an exchange-traded fund that tracks the performance of an index representing commodities spanning multiple commodity groups). | | |
| 209. | Commodity Index Trading Start Date | Question 14iia | Conditional. Required if isCommodityIndexTrader_manager = 'Y' OR isCommodityIndexTrader_investor = 'Y' | For traders who are engaged in Commodity Index Trading as defined in Paragraph A or B of the CIT definition, indicates the month and year in which the trader first became engaged in such trading. | YYYY-MM-DD | cftcBatch/cftcForm40@initiatedCommodityIndexTrading |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|----------------------------------|--------------------------------|-----------------|---|--|---|
| 210. | Swap Dealer Indicator | Question 15 | Yes | Indicates if the reporting trader is a swap dealer as defined in § 1.3(ppp) of regulations under the Commodity Exchange Act | Y = Yes N = No | cftcBatch/cftcForm40@isSwapDealer |
| 211. | Major Swap Participant Indicator | Question 16 | Yes | Indicates if the reporting trader is a Major Swap Participant, as defined in § 1.3(qqq) of regulations under the Commodity Exchange Act | Y = Yes N = No | cftcBatch/cftcForm40@isSwapParticipant |
| 212. | Business Sector | Question 17 | No | Each business sector and subsector that pertains to the business activities or occupation of the reporting trader | See Appendix B of this Technical Document – Supplemental List I for valid submission codes | cftcBatch/cftcForm40/natureOfBusiness@businessSector |
| 213. | Business Subsector | Question 17 | No | Each business sector and subsector that pertains to the | See Appendix B of this Technical Document – Supplemental List I | cftcBatch/cftcForm40/natureOfBusiness@businessSubSector |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|--|--------------------------------|--|---|---|--|
| | | | | business activities or occupation of the reporting trader | for valid submission codes | |
| 214. | Other Description – Business Subsector | Question 17 | No | Description of the subsector in the event that “Other” is selected. | | cftcBatch/cftcForm40/natureOfBusiness@otherDescription |
| 215. | Primary Subsector | Question 17 | Conditional. Required if businessSubSect or is not null. | In the event that more than one (sub)sector is listed, an indication of the (sub)sector primarily describes the nature of the reporting trader’s business | Y=Yes N=No | cftcBatch/cftcForm40/natureOfBusiness@isPrimary |
| 216. | Commodities Traded | Question 18 | No | Each individual commodity or commodity group that the reporting trader presently trades or expects to trade in the near future in | See Appendix B of this Technical Document – Supplemental List II for valid submission codes | cftcBatch/cftcForm40/natureOfBusiness@commodity |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|---|--------------------------------|-------------------------------------|--|---|--|
| | | | | derivatives markets (There is a supplementary list to select from in the form) | | |
| 217. | Commodity Groups Traded | Question 18 | No | Each individual commodity or commodity group that the reporting trader presently trades or expects to trade in the near future in derivatives markets (There is a supplementary list to select from in the form) | See Appendix B of this Technical Document – Supplemental List II for valid submission codes | cftcBatch/cftcForm40/natureOfBusiness@commodityGroup |
| 218. | Other Description – Commodity/ Commodity Group Traded | Question 18 | No | A description of the commodity group and commodity in the event that the user selects “Other”. | | cftcBatch/cftcForm40/natureOfBusiness@otherDescription |
| 219. | Individual Commodity Business | Question 19 | Conditional. Required if Individual | For each listed individual commodity, | See Appendix B of this Technical Document – | cftcBatch/cftcForm40/natureOfBusiness@businessPurpose |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|---|--------------------------------|---|---|--|---|
| | Purpose | | Commodity is selected, then business purpose must be added. | indicates the business purposes for which the reporting trader uses derivatives markets (There is a supplementary list to select from in the form) | Supplemental List III for valid submission codes | |
| 220. | Individual Commodity Predominant Business Purpose Indicator | Question 19 | Conditional Required if businessPurpose is not null. | If the reporting trader has more than one business purpose for trading in an individual commodity, indicates the predominant business purpose ²³ | Y=Yes N=No | cftcBatch/cftcForm40/natureOfBusiness@isPrimary |
| 221. | Reporting Trader Authorization Indicator | Question 20 | Yes | Indicates if the submitter is duly authorized by the reporting trader | Y = authorized N = not authorized | cftcBatch/cftcForm40/contact@isAuthorizedRepresentative |

²³ When responding to question 19, reporting traders should use their discretion in determining the predominant business purpose. A “predominant business purpose” may include, for example, the business purpose that is predominant in terms of monetary value, or other business purpose deemed predominant by a reporting trader.

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|---------------------------------------|--------------------------------|-----------------|---|---------------------|--|
| | | | | to provide the information and representations submitted on this Form 40, and that information and representations are true and correct | | |
| 222. | Authorized Representative Last Name | Question 20 | Yes | Surname of the authorized representative | | cftcBatch/cftcForm40/contact@lastName |
| 223. | Authorized Representative First Name | Question 20 | Yes | Given or first in order name of the authorized representative | | cftcBatch/cftcForm40/contact@firstName |
| 224. | Authorized Representative Middle Name | Question 20 | Yes | Middle name of the authorized representative | | cftcBatch/cftcForm40/contact@middleName |
| 225. | Authorized Representative Name Suffix | Question 20 | Yes | Generation or name suffix of the authorized representative | | cftcBatch/cftcForm40/contact@nameSuffix |
| 226. | Authorized Representative Position | Question 20 | Yes | Job position of the authorized representative | | cftcBatch/cftcForm40/contact@titleOrPosition |

| | Data Element | Form 40 Question Number | Required | CFTC Description, Purpose or Instruction | Valid Values | XML |
|-------------|--|--------------------------------|-----------------|---|---------------------|---------------------------------|
| 227. | Authorized Representative Submitted on behalf of | Question 20 | Yes | Reporting Trader Name 40 was submitted on behalf of | | cftcBatch/cftcForm40@onBehalfOf |
| 228. | Date of Submission | Question 20 | Yes | Date [indicated by the authorized representative] that the form was submitted to CFTC | | cftcBatch/cftcForm40@submitDate |

Appendix A: SFTP Account Registration

To register an SFTP account:

1. Browse to the Account Creation Page on the Commission's website, <https://services.cftc.gov/CreateCFTCAccount/CreateLoginAccount.aspx>.
2. Confirm that you have read the agreement and agree to abide by its terms by selecting the **Agreement to Terms of Use** check box and clicking **Agree**.



CFTC DATA SUBMISSION ACCOUNT CREATION & USER REGISTRATION

These terms of use apply exclusively to your access to, and use of, CFTC data submission systems and do not alter in any way the terms or conditions of any other agreement you may have with the CFTC.

These terms of use may be changed at any time without notice by the CFTC.

If any provision of these terms of use shall be deemed unlawful, void, or for any reason unenforceable, then that provision shall be deemed severable from these terms of use and shall not affect the validity and enforceability of any remaining provisions.

User ID and Password

A unique User ID and Password will be generated by the CFTC and e-mailed to the e-mail address you provide. You agree to notify the CFTC immediately if you have reason to believe your password has been lost or stolen; your account has been accessed improperly; or attempts have been made to access your account without your permission.

Only one individual or entity can use each User ID and Password. Accounts are non-transferable.

User IDs and Passwords may be used only to submit valid data and may not be used for any fraudulent purposes. The CFTC reserves the right to reset any Passwords that have been lost or stolen or have not been used for more than 120 days.

Privacy Act Disclosure

The CFTC is authorized to collect reports and information from traders with derivatives positions pursuant to, among other sections, Sections 2(d), 4i, 4t and 8 of the Commodity Exchange Act (7 U.S.C. 2(d), 6i, 4t and 12). The information requested is used generally to gather information concerning the size and composition of the derivatives markets and to facilitate the CFTC's market and financial surveillance responsibilities. Information collected may be used by the Commission for investigations or litigation and, in limited circumstances, may be made public in accordance with provisions of the Commodity Exchange Act. Information may also be disclosed to other government agencies, and, in certain situations, it may be disclosed to any "registered entity" (as defined in Commodity Exchange Act Section 1a), to any registered futures association registered under Section 17 of the Commodity Exchange Act, and to any national securities exchange or national securities association registered with the Securities and Exchange Commission to assist those organizations in carrying out their self-regulatory responsibilities under the Securities Exchange Act of 1934, 15 USC 78a, *et seq.*

The complete listing of routine uses of the information contained in these records, in accordance with the Privacy Act, 5 U.S.C. §522a, and the Commission's rules thereunder, 17 CFR Part 146, is found in the Commission's compilation of its System of Records Notices, 76 Fed. Reg. 5974 (February 2, 2011), as may be amended. Disclosure of the information requested is mandatory for covered individuals and organizations, and failure to comply may result in the imposition of criminal or civil sanctions.

Contact Information

To report a lost or stolen Password, improper use of your account, or attempts to use your account, contact us immediately by telephone at 202-418-5600 or by email to DCITSCSC@cftc.gov.

Agreement to Terms of Use:

I have read the usage agreement and agree to abide by its terms.

After selecting the Agree button, you will be directed to a page where you can request the User ID and Password required to enter and submit data to the CFTC.

[AGREE >>>](#)

[DECLINE >>>](#)

For information, contact:
Susan Donlan
Chief, Market Information Group
New York Regional Office
sdonlan@cftc.gov
646-746-9784

Margaret Sweet
Assistant Branch Chief
Chicago Regional Office
msweet@cftc.gov
312-596-0609

3. On the **Request Account Creation** page, supply the following information:
 - **Requester first name** – The first name of the user requesting the account
 - **Requester last name** – The last name (or surname) of the user requesting the account
 - **Company name** – The Company that will be supplying the data to the CFTC
 - **Email address** – The email address of the contact. The email address must be from the domain that will be submitting data; the Reporting Entities domain. Third party email domains (e.g., hotmail, yahoo, gmail) will not be accepted.
 - **Telephone** – The requester’s phone number, should CFTC need to confirm the user via a phone call.
 - **Fax** – Not required

REQUEST ACCOUNT CREATION FOR DATA SUBMISSION TO THE CFTC

Registration Restriction: [Email Confirmation Required.]

We recommend that you routinely change your password. The CFTC reserves the right to reset any Passwords that have been lost or stolen or have not been used for more than 120 days; The CFTC reserves the right to modify, suspend, deactivate, terminate or delete any account that violates any part of [Submission Account Creation & User Registration Agreement](#). Accounts are non-transferable.

Please enter the following information:

*Requester first name:

*Requester last name:

*Company name:

*Email address:

Email address must be the domain from which data submissions will be made. Third party email domains, e.g., hotmail, yahoo, will be rejected.

*Confirm email address:

*Telephone:

Fax:

*Required Field

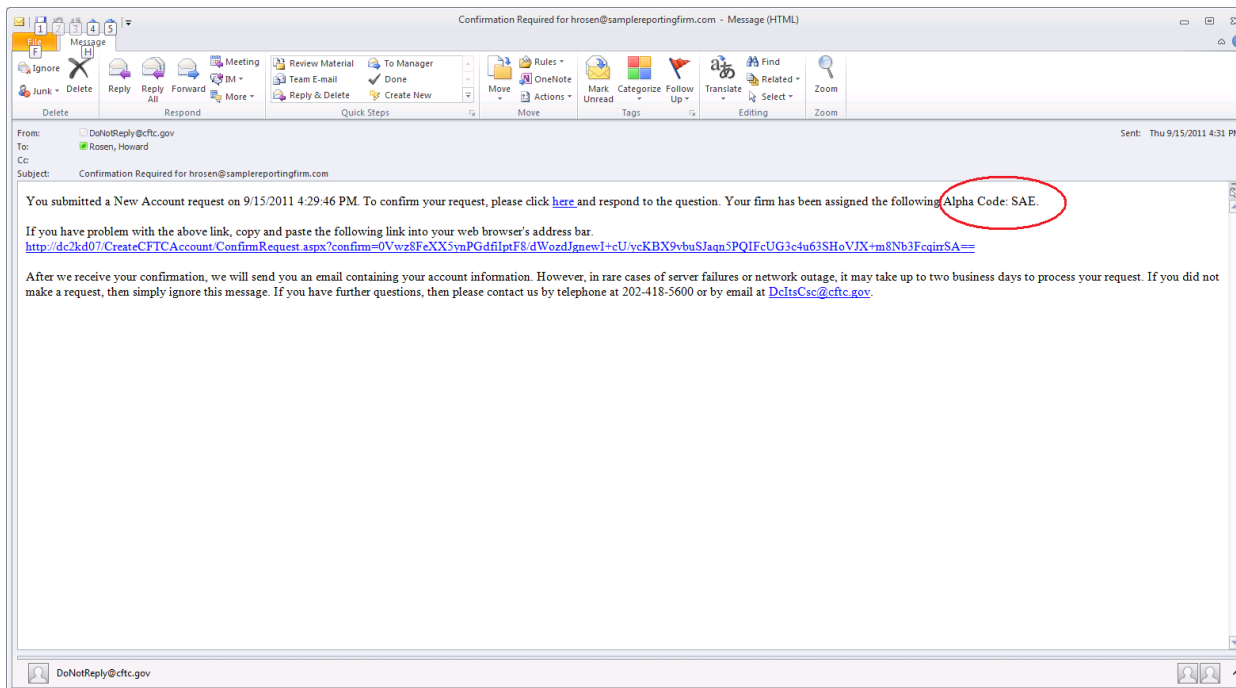
Once you have submitted the data, the request will be passed to CFTC’s Office of Data and Technology for approval.

REQUEST ACCOUNT CREATION FOR DATA SUBMISSION TO THE CFTC

The CFTC will review your request and send you an email after your request has been processed.

Return to CFTC.gov

4. Once the account creation is approved, you will be sent an email with a link to confirm the request. Note the **three-letter Alpha Code** that must be used for all data submissions made by this company to the CFTC.



5. Click the **confirmation link** in the email (or copy the URL into your web browser).
6. On the **Confirm Your Request** screen, confirm the account creation request by typing in the **three-letter Alpha Code** supplied in the email and click **Confirm**.

CONFIRM YOUR REQUEST

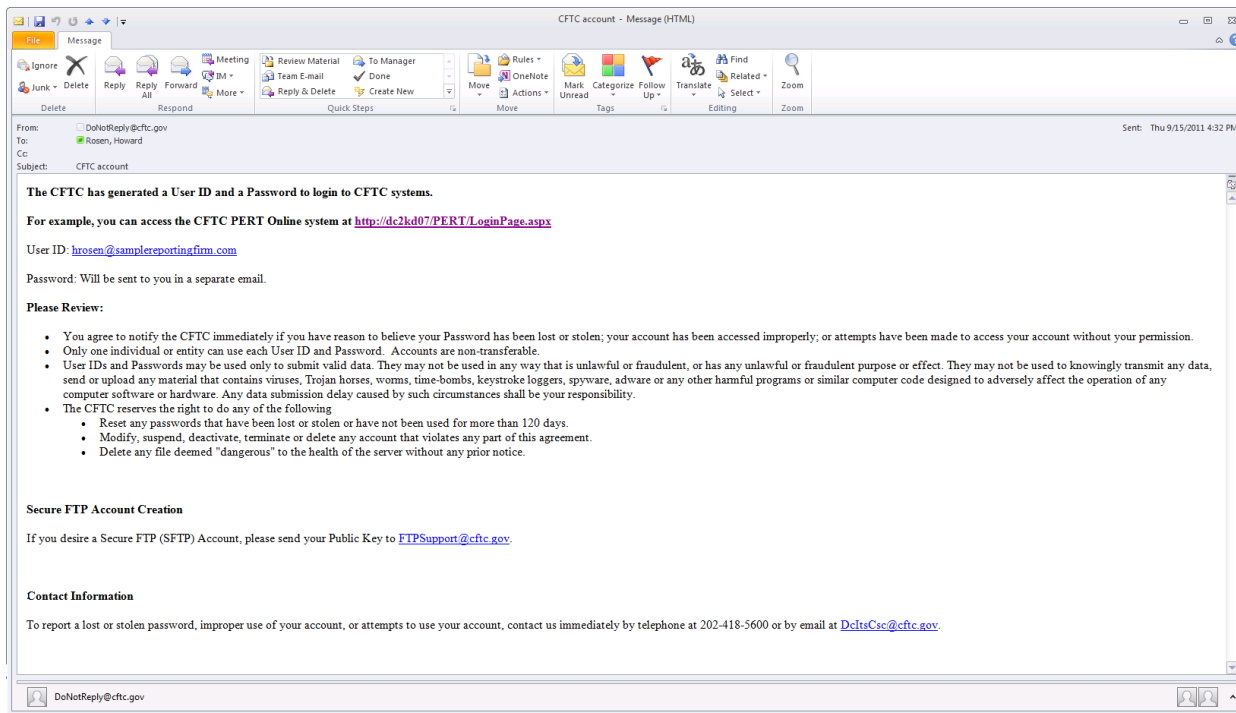
Reporting firms enter your firm's Alpha Code. Service Bureau and other organizations enter your Confirmation Code. Click the Confirm button once complete.

A message will display indicating that your request has been submitted.

CONFIRM YOUR REQUEST

Your request has been submitted and will be processed momentarily. Please check your email box.

You will receive two follow-on emails from the CFTC. Each email will address guidelines for using this account. The first email will contain your new user ID and instructions on converting your FTP Account to a Secure FTP Account.



7. All reporting entities must exchange their Public Keys with the CFTC to activate their Secure FTP account. Send your **Public Key** to FTPSupport@cftc.gov.

You will then receive the second email, which will contain your new password for the FTP account.

Appendix B: Supplemental Lists

Supplemental List I: List of Business Sectors and Subsectors²⁴

| Business Sector Name | Business Sector Code | Business Subsector Name | Business Subsector Code |
|--|----------------------|---|-------------------------|
| Agriculture and Forestry | SA | Oilseed Farming | SSA |
| Agriculture and Forestry | SA | Grain Farming | SSB |
| Agriculture and Forestry | SA | Fruit and Tree Nut Farming | SSC |
| Agriculture and Forestry | SA | Other Crop Farming (Specify) | SSD |
| Agriculture and Forestry | SA | Cattle Ranching and Farming | SSE |
| Agriculture and Forestry | SA | Hog and Pig Farming | SSF |
| Agriculture and Forestry | SA | Poultry and Egg Production | SSG |
| Agriculture and Forestry | SA | Sheep and Goat Farming | SSH |
| Agriculture and Forestry | SA | Other Animal Production | SSI |
| Agriculture and Forestry | SA | Forestry, Logging, or Timber Production | SSJ |
| Agriculture and Forestry | SA | Cooperative | SSK |
| Agriculture and Forestry | SA | Other (Specify) | SSL |
| Mining, Oil and Natural Gas Extraction | SB | Oil Exploration/Production | SSM |
| Mining, Oil and Natural Gas Extraction | SB | Natural Gas Exploration/Production | SSN |
| Mining, Oil and Natural Gas Extraction | SB | Coal Mining | SSO |
| Mining, Oil and Natural Gas Extraction | SB | Precious Metal Mining | SSP |
| Mining, Oil and Natural Gas Extraction | SB | Non-Precious Metal Mining | SSQ |
| Mining, Oil and Natural Gas Extraction | SB | Other (Specify) | SSR |
| Utilities | SC | Utility/Cooperative | SSS |

²⁴ When reviewing the Appendix B Supplemental Lists in this Technical Document, reporting parties should also review and consult the OCR Final Rule, including the requirements of Form 40 included in the appendix thereto. This Form 40 is the basis for these Appendix B Supplemental Lists. Reporting parties should visit this link to view the OCR Final Rule on the Federal Register: <https://www.federalregister.gov/articles/2013/11/18/2013-26789/ownership-and-control-reports-forms-102102s-4040s-and-71>

Visit this link to view a pdf copy of the OCR Final Rule: <http://www.cftc.gov/ucm/groups/public/@lrfederalregister/documents/file/2013-26789a.pdf>

| Business Sector Name | Business Sector Code | Business Subsector Name | Business Subsector Code |
|--|-----------------------------|---|--------------------------------|
| Utilities | SC | Electric Power Generation | SST |
| Utilities | SC | Local Distribution Company | SSU |
| Utilities | SC | Natural Gas Distribution | SSV |
| Utilities | SC | Other (Specify) | SSW |
| Construction | SD | Building Construction | SSX |
| Construction | SD | Heavy and Civil Engineering Construction | SSY |
| Construction | SD | Other (Specify) | SSZ |
| Manufacturing, Refining and Processing | SE | Animal Food Manufacturing | SSAA |
| Manufacturing, Refining and Processing | SE | Grain Milling | SSAB |
| Manufacturing, Refining and Processing | SE | Oilseed Milling | SSAC |
| Manufacturing, Refining and Processing | SE | Sugar and Confectionery Product Manufacturing | SSAD |
| Manufacturing, Refining and Processing | SE | Fruit and Vegetable Preserving and Specialty Food Manufacturing | SSAE |
| Manufacturing, Refining and Processing | SE | Dairy Product Manufacturing | SSAF |
| Manufacturing, Refining and Processing | SE | Animal Slaughtering and Processing | SSAG |
| Manufacturing, Refining and Processing | SE | Bakeries | SSAH |
| Manufacturing, Refining and Processing | SE | Other Food Manufacturing | SSAI |
| Manufacturing, Refining and Processing | SE | Beverage Manufacturing Textile Mills | SSAJ |
| Manufacturing, Refining and Processing | SE | Textile Product Mills | SSAK |
| Manufacturing, Refining and Processing | SE | Apparel Manufacturing | SSAL |
| Manufacturing, Refining and Processing | SE | Wood Product Manufacturing | SSAM |
| Manufacturing, Refining and Processing | SE | Paper Manufacturing | SSAN |
| Manufacturing, Refining and Processing | SE | Pulp, Paper, and Paperboard Mills | SSAO |
| Manufacturing, Refining and Processing | SE | Petroleum and Coal Products Manufacturing | SSAP |
| Manufacturing, Refining and Processing | SE | Renewable Fuels Manufacturing | SSAQ |
| Manufacturing, Refining and Processing | SE | Petrochemical/Chemical Manufacturing | SSAR |
| Manufacturing, Refining and Processing | SE | Plastics and Rubber Products Manufacturing | SSAS |
| Manufacturing, Refining and Processing | SE | Natural Gas Processing | SSAT |

| Business Sector Name | Business Sector Code | Business Subsector Name | Business Subsector Code |
|--|-----------------------------|--|--------------------------------|
| Manufacturing, Refining and Processing | SE | Precious Metal Processor/Smelter | SSAU |
| Manufacturing, Refining and Processing | SE | Non-Precious Metal Processor | SSAV |
| Manufacturing, Refining and Processing | SE | Metals Fabricator | SSAW |
| Manufacturing, Refining and Processing | SE | Other (Specify) | SSAX |
| Wholesale Trade | SF | Lumber and Other Construction Materials Merchant Wholesalers | SSAY |
| Wholesale Trade | SF | Metal and Mineral Merchant Dealer | SSAZ |
| Wholesale Trade | SF | Grocery and Related Product Merchant Wholesaler | SSBA |
| Wholesale Trade | SF | Farm Product Raw Material Merchant Wholesalers | SSBB |
| Wholesale Trade | SF | Chemical and Allied Products Merchant Wholesalers | SSBC |
| Wholesale Trade | SF | Petroleum and Petroleum Products Merchant Wholesalers | SSBD |
| Wholesale Trade | SF | Natural Gas, Power Marketer | SSBE |
| Wholesale Trade | SF | Importer/Exporter (specify commodities) | SSBF |
| Wholesale Trade | SF | Other (Specify) | SSBG |
| Retail Trade | SG | Building Materials and Supplies Dealers | SSBH |
| Retail Trade | SG | Food and Beverage Stores | SSBI |
| Retail Trade | SG | Jeweler/Precious Metals Retailer | SSBJ |
| Retail Trade | SG | Vehicle Fuel Retailer/Convenience Store Operator | SSBK |
| Retail Trade | SG | Fuel Dealers | SSBL |
| Retail Trade | SG | Other (Specify) | SSBM |
| Transportation and Warehousing | SH | Air Transport | SSBN |
| Transportation and Warehousing | SH | Trucking | SSBO |
| Transportation and Warehousing | SH | Pipeline Transportation of Crude Oil | SSBP |
| Transportation and Warehousing | SH | Pipeline Transportation of Natural Gas | SSBQ |
| Transportation and Warehousing | SH | Farm Product Warehousing and Storage | SSBR |

| Business Sector Name | Business Sector Code | Business Subsector Name | Business Subsector Code |
|---|-----------------------------|--|--------------------------------|
| Transportation and Warehousing | SH | Energy Distributor (warehousing, storage) | SSBS |
| Transportation and Warehousing | SH | Other (Specify) | SSBT |
| End User (NOTE: May not be the only/primary subsector selected) | SI | Metals End User (Construction Co., Brass Mill, Steel Mill) | SSBU |
| End User (NOTE: May not be the only/primary subsector selected) | SI | Emissions End User (Factory, Industrial Cos.) | SSBV |
| End User (NOTE: May not be the only/primary subsector selected) | SI | Petroleum End User (Airline Cos. Municipalities, Industrial Cos., Trucking Cos.) | SSBW |
| Information | SJ | Other (Specify) | SSBX |
| Real Estate | SK | Other (Specify) | SSBY |
| Arts, Entertainment, and Recreation | SL | Performing Arts Companies | SSBZ |
| Arts, Entertainment, and Recreation | SL | Promoters of Performing Arts | SSCA |
| Arts, Entertainment, and Recreation | SL | Agents and Managers for Artists and Entertainers | SSCB |
| Arts, Entertainment, and Recreation | SL | Independent Artists, Writers, Performers | SSCC |
| Arts, Entertainment, and Recreation | SL | Other (Specify) | SSCD |
| Accommodation and Food Services | SM | Food Services | SSCE |
| Accommodation and Food Services | SM | Other (Specify) | SSCF |
| Public Administration | SN | Administration of Environmental Quality Programs | SSCG |
| Public Administration | SN | Administration of Economic Programs | SSCH |
| Public Administration | SN | Other (Specify) | SSCI |

Supplemental List II: List of Commodity Group and Individual Commodities

| Commodity Group Name | Commodity Group Code | Individual Commodity Name | Individual Commodity Code |
|--------------------------------|----------------------|----------------------------------|---------------------------|
| Base Metals | N25 | Copper | 085 |
| Base Metals | N25 | Steel | 192 |
| Chemicals | N40 | | |
| Currency | F10 | | |
| Dairy Products | A25 | Butter | 050 |
| Dairy Products | A25 | Milk | 052 |
| Dairy Products | A25 | Cheese | 063 |
| Electricity And Sources | N16 | Uranium | 016 |
| Electricity And Sources | N16 | Coal | 024 |
| Electricity And Sources | N16 | Electricity | 064 |
| Emissions | N60 | | |
| Equities And Equity Indices | XXX | | |
| Fiber | A40 | Cotton | 033 |
| Foodstuffs/Softs | A50 | Coffee | 083 |
| Foodstuffs/Softs | A50 | Frozen Concentrated Orange Juice | 040 |
| Foodstuffs/Softs | A50 | Sugar | 080 |
| Foodstuffs/Softs | A50 | Cocoa | 073 |
| Grains | A10 | Wheat | 001 |
| Grains | A10 | Corn | 002 |
| Grains | A10 | Oats | 004 |
| Grains | A10 | Rice | 039 |
| Interest Rates - U.S. Treasury | F30 | | |
| Livestock/Meat Products | A20 | Live Cattle | 057 |
| Livestock/Meat Products | A20 | Pork Bellies | 056 |
| Livestock/Meat Products | A20 | Feeder Cattle | 061 |
| Livestock/Meat Products | A20 | Lean Hogs | 054 |
| Natural Gas And Products | N13 | Natural Gas | 023 |

| Commodity Group Name | Commodity Group Code | Individual Commodity Name | Individual Commodity Code |
|-----------------------------|----------------------|---------------------------|---------------------------|
| Natural Gas And Products | N13 | Natural Gas Liquids | 066 |
| Oilseed And Products | A30 | Soybeans | 005 |
| Oilseed And Products | A30 | Soybean Oil | 007 |
| Oilseed And Products | A30 | Soybean Meal | 026 |
| Other (Specify) | XXX | | |
| Other Agricultural | A90 | | |
| Other Financial Instruments | F90 | | |
| Petroleum And Products | N10 | Jet Fuel | 262 |
| Petroleum And Products | N10 | Ethanol | 025 |
| Petroleum And Products | N10 | Biodiesel | 036 |
| Petroleum And Products | N10 | Fuel Oil | 021 |
| Petroleum And Products | N10 | Heatingoil-Diesel-Gasoil | 022 |
| Petroleum And Products | N10 | Gasoline | 111 |
| Petroleum And Products | N10 | Naphtha | 032 |
| Petroleum And Products | N10 | Crude Oil | 067 |
| Petroleum And Products | N10 | | |
| Plastics | N50 | | |
| Precious Metals | N20 | Palladium | 075 |
| Precious Metals | N20 | Platinum | 076 |
| Precious Metals | N20 | Silver | 084 |
| Precious Metals | N20 | Gold | 088 |
| Real Estate | E10 | | |
| Weather | N70 | | |
| Wood Products | N30 | Lumber | 058 |
| Wood Products | N30 | Pulp | 069 |

Supplemental List III: List of Business Purposes of Commodity Derivatives Trading

| Business Purpose Code | Business Purpose Name | Business Purpose Description | Business Purpose Example |
|------------------------------|---|---|--|
| 11 | Offsetting Cash or Spot Market Input Price Risk | Using derivative markets for commodities that are direct inputs or purchases for your business so as to offset price risk associated with your purchase of these inputs | You are a grain processor, so you use wheat futures to offset the price risk incidental to your cash purchases of wheat |
| 12 | Offsetting Cash or Spot Market Output Price Risk | Using derivative markets for commodities that are direct outputs or sales of your business so as to offset price risk associated with your sale of these outputs | You are a gasoline refiner, so you use gasoline futures to offset price risk associated with your production of gasoline |
| 13 | Offsetting Other Cash or Spot Market Price Risks (Cross Price Risk) | Using derivative markets for a commodity that is not a direct input or output of your business, but which has significant price correlations with the direct inputs or outputs of your business | You manufacture ethanol which is used as an additive in and competitor for gasoline as a combustive fuel. While you neither directly consume nor produce gasoline, you may find that the price you receive for your ethanol product is highly correlated with the price of gasoline, and therefore you reduce ethanol price risk by using gasoline futures contracts |
| 14 | Other Physical Risk Management Strategies | Managing other price risks incidental to the operation of your business or physical assets through the use of commodity derivative markets | You are a manufacturer with significant international sales, so you use foreign currency futures to offset risks associated with changes in the competitiveness of your exports and therefore the value of your physical assets such as production plants, land, machinery, etc |
| 15 | Client Futures/Options Trading | Fulfilling customer/client desire for portfolio diversification or exposure to various asset classes through your | You collect funds and execute trading strategies through the use of futures/options markets at the expressed intent and for the |

| Business Purpose Code | Business Purpose Name | Business Purpose Description | Business Purpose Example |
|------------------------------|------------------------------------|---|--|
| | | activity as a Commodity Pool Operator, Commodity Trading Advisor, or other similar role | sole benefit of clients |
| 16 | Managing Client Swaps Exposure | Reducing risk stemming from holding or executing swaps contracts on behalf of clients or customers through the use of futures/options markets | You sell crude oil swaps to a client and agree to accept the risk inherent in the index price. You offset this risk through purchases of crude oil futures, in effect transferring price risk from the client to another market participant |
| 17 | Making Markets/Providing Liquidity | Engaging in derivatives transactions to assume risk and help transfer ownership of derivative positions from one market participant to another, realizing the bid-ask spread as the return | You accept risk by buying and selling futures/options contracts so that other traders can move into and out of positions when they wish. You then find other traders willing to take the other side of those transactions |
| 18 | Arbitrage | Using derivative markets as part of a strategy designed to realize risk-free profit from pricing anomalies | You realize that the wheat futures contract is trading at a discount (even after considering storage, transport, etc.) relative to the wheat cash price, and therefore find it profitable to purchase the wheat futures contract, take delivery, and then resell the wheat in the cash market for a risk-free profit |
| 19 | Establishing Price Exposure | Using derivative markets as a way to express your belief in the future movement of market prices. This strategy does not involve offsetting risks incidental to your business, but instead involves directional trading | You conduct research and believe that crude oil prices are due to rise, so you take long futures positions in crude oil to profit from your predictions |
| 20 | Financial Asset Management | Using derivatives to diversify, | You hold Treasury bonds as a component |

| Business Purpose Code | Business Purpose Name | Business Purpose Description | Business Purpose Example |
|-----------------------|-------------------------------------|---|---|
| | | rebalance, or otherwise allocate financial assets so that risks to the value of the investment portfolio are reduced. This strategy is used by entities such as pension funds and endowments to manage overall risk to their financial portfolios | of your investment portfolio, and use futures contracts to reduce overall portfolio risk that would result from falling bond prices |
| 21 | Managing Proprietary Swaps Exposure | Reducing risk stemming from your proprietary holding or execution of swaps contracts through the use of futures/options markets | You trade interest rate swaps as part of your business or investment strategy, and offset some of the risk inherent in those swaps through your use of Eurodollar futures markets |
| 22 | Other: Specify | List and explain your business purpose if the above categories do not adequately describe the reason you trade in a particular commodity derivative market | |