



CFTC Swap Data Reporting Requirements Disclosures

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

I. Unique Transaction Identifier

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

In lieu of the existing Unique Swap Identifier (the “USI”), the CFTC adopted a requirement to identify swaps using the Unique Transaction Identifier (the “UTI”), consistent with the CPMI-IOSCO technical guidance (“**Harmonisation of the Unique Transaction Identifier (UTI), guidance issued by CPMI-IOSCO¹**”).

Pursuant to the rulemaking, DBAG is reporting new transactions pursuant to the ISO standardized guidelines for UTI as follows:

- **Field Content:** The UTI is made of two parts; a prefix and a Trade ID with a maximum limit of 52 characters, consistent with ISO 23897² guidelines:
 - The prefix is the current full Legal Entity Identifier (the “LEI”) of the generating entity (DBAG) in accordance with ISO 17442³, which is 20 characters long;
 - The Trade ID remains in the same format (up to 32 digits long), generated by DBAG, which is within the criteria outlined in ISO 23897 guidelines.

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

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

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



II. Unique Product Identifier

On February 16, 2023, the CFTC issued an order (the “**UPI Order**”) to designate a unique product identifier (the “**UPI**”) and product classification system to be used in swap data reporting and recordkeeping. The UPI Order requires DBAG as a swap dealer to use UPIs issued by the Derivatives Service Bureau Limited (the “**DSB**”) for swaps in the credit, equity, foreign exchange, and interest rate asset classes (the “**Covered Asset Classes**”)⁴ to comply with certain of the CFTC’s swap recordkeeping and reporting requirements.

Beginning January 29, 2024, DBAG will report UPIs in connection with its compliance with the Reporting Rules for the Covered Asset Classes, which will replace other product-related fields.

Should you have any further questions please reach out to df.protocol@db.com.

⁴ CFTC has not yet published an order with respect to the UPI use for commodity asset class