



Banc Ceannais na hÉireann
Central Bank of Ireland

Eurosystem

AnaCredit Data Returns

Notes on Compilation

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Version Control Table

Version	date	Comment
V1.0	31 January 2017	Original document
V2.0	28 April 2017	Incorporated guidance on credit and credit risk data returns; document renamed; minor general updates.
V2.1	16 June 2017	Updated guidance on Credit Union reporting, reporting instruments to end-quarter, reporting LEI for non-resident entities and removal of "Address: Unit/block" attribute. Minor editing changes also applied.
V2.2	21 July 2017	Inclusion of table listing Reporting Member States, updated guidance on reporting of counterparty role attributes and reporting of date attributes. Minor editing changes were also applied.
V2.3	08 September 2017	Minor editing changes applied to align with the AnaCredit Manual and clarification on reporting of special values. Updated guidance on reporting of date attributes. Inclusion of flow charts to facilitate reporting counterparty attributes.
V2.4	24 November 2017	Minor editing changes to correct typos and for consistency. Updated guidance on the attributes "Non-Irish identifier type", "Non-Irish identifier" and "Identifier free text".
V2.5	22 December 2017	Inclusion of diagram in section 3.1. Appendix III now refers to separate "Reporting counterparty reference data attributes" file. Minor editing changes.
V2.6	23 May 2018	Updated guidance on the attributes "Non-Irish identifier type", "Non-Irish identifier", "Name" and "Address: postal code". Correction to example 3 (page 41). Minor editing changes.
V2.7	7 May 2020	Inclusion of information on how to report International Organisations
V2.8	11 December 2020	Updated to reflect changes to identifiers published by the ECB dated as outlined in the

		Template change log V1.0. Additional guidance on the attribute Date of address. Information provided on identifiers for Government bodies. Additional guidance provided on the submission of Counterparty Roles. Additional clarifications relating to reporting in light of COVID 19 and guidance on the re-submission of historical data
V2.9	1 October 2022	Update to 4.2.4.2.1 Non-Irish identifier type and Non-Irish identifier to reflect updates to the List of National Identifiers and when to submit Gen identifiers. Update to 4.2.3 description of a valid LEI.
V3.0	1 January 2023	The addition of Croatia to the List of Reporting Member States.

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Introduction

These notes on compilation are designed to assist reporting agents complete the Central Bank of Ireland (hereafter Central Bank) AnaCredit Returns that will become effective from 31 December 2017 and 30 September 2018. More specifically, they relate to the following returns:

- ACPRD for all credit institutions;
- ACR1B for all credit institutions except credit unions;
- ACR2B for all credit institutions except credit unions; and
- ACR1CU for credit unions only.

Whilst the requirements and rules underpinning the document are fixed, the document can be updated and refined as required, including taking on board views of reporting agents. These notes draw heavily on the ECB AnaCredit Manual with amendments as required to accommodate Irish particular issues and decisions of national discretion.

Comments on the document are welcomed, and can be forwarded to AnaCredit@centralbank.ie.

The notes should be read along with the relevant Regulation, template and manual.

Section 1: General Guidance

These notes on compilation set out the statistical reporting requirements for credit institutions resident in Ireland in relation to the AnaCredit Data Returns (ACPRD, ACR1B, ACR2B, ACR1CU). The returns satisfy credit institutions' reporting requirements as laid down in Regulation (EU) 2016/13 on the collection of granular credit and credit risk data.

This new data initiative, known as Analytical Credit Datasets (AnaCredit), comprises the collection of granular credit data based on harmonised ECB statistical reporting requirements. The objective is to establish a common granular credit database shared between the Eurosystem members, comprising input data for all euro area member states. Granular credit data can be widely used to serve a number of different functions. The AnaCredit data will support the ECB and the Central Bank in performing their central banking and supervisory functions including monetary policy analysis and operations, risk management, financial stability surveillance, statistics, macroprudential policy and research.

A key part of building the AnaCredit System, is the production of a register uniquely identifying counterparties involved in the transactions covered in AnaCredit. The AnaCredit Counterparty Return (ACPRD) will collect the required information from reporting credit institutions on the relevant counterparties.

The remaining data templates will be collected on a monthly and quarterly return. For credit institutions except credit unions, the applicable returns are the ACR1B on a monthly basis and the ACR2B on a quarterly basis. For credit unions, the applicable return is the ACR1CU.

1.1 Reporting population

All Irish resident credit institutions are subject to the reporting requirements laid out in the AnaCredit Regulation. These are:

- institutions incorporated and located in the Republic of Ireland, including subsidiaries of parent companies located outside the Republic of Ireland;
- **and**
- branches of institutions that have their head office outside the Republic of Ireland

A list of all Irish credit institutions within the reporting population is available on the Central Bank's [AnaCredit webpage](#). For each credit institution, it is indicated whether a reporting obligation to the Central Bank under AnaCredit applies.

These are the **reporting agents**, as defined in Article 1(8) of the Regulation. These entities should report AnaCredit data relating to credit granted or serviced by the domestic part (resident office) of the entity as well as any foreign branch controlled by the reporting agent.

Both the resident office and the foreign branches of the Irish credit institution are the **observed agents**, as defined in Article 1(9). An observed agent is an institutional unit whose activity as creditor or servicer is reported by the reporting agent.

The scope of the data reported to the Central Bank by its reporting agents covers data on credit extended or serviced by the following observed agents:

- Credit institutions located in Ireland, including branches of foreign credit institutions; and
- Branches of Irish credit institutions, located in other euro area countries.

The Central Bank has taken the decision to exclude Observed Agents that are not resident in euro area countries. This includes branches of Irish credit institutions, located in countries outside the euro area. Reporting agents with foreign branches located in countries outside the euro area will not be required to report any data relating to these branches to the Central Bank.

Foreign subsidiaries of Irish credit institutions are not within the scope of reporting to the Central Bank but they may have reporting obligations to other National Central Banks (NCBs).

Table 1: Summary of entities covered in reporting to the Central Bank of Ireland

Entity Type	Data included in reporting to the Central Bank
Credit institutions located in Ireland	Yes
Irish Branches of non-Irish credit institutions	Yes
Branches of Irish credit institutions, located in other euro area countries	Yes
Branches of Irish credit institutions, located in countries outside the euro area.	No
Foreign subsidiaries of Irish credit institutions	No

Reporting agents shall report AnaCredit data on an individual basis. Reporting agents that are legal entities report in relation to all observed agents that are part of the legal entity. Reporting agents that are foreign branches located in Ireland report in relation to their own activity.

1.2 Derogations

Article 16 of the Regulation allows for derogations to be applied to small reporting agents. A full derogation may be granted by the Central Bank to small reporting agents, provided that the combined contribution of these reporting agents to the total outstanding amount of loans reported under the BSI Regulation (as reported in the Central Bank RS2 return) by all reporting agents resident in Ireland does not exceed 2%.

Furthermore, the Central Bank is entitled to allow small reporting agents to report credit data relating to reporting reference dates prior to 1st January 2021 on a quarterly instead of a monthly basis, provided that the combined contribution of these reporting agents to the total outstanding amount of loans reported under the BSI Regulation does not exceed 4%.

The Central Bank has taken the following decisions in relation to the application of such derogations:

- (1) A full derogation is available to a number of credit unions. The total combined contribution of credit unions to the total outstanding amount of loans reported under the BSI Regulation is in excess of 2%. Therefore, a number of credit unions will be obliged to report.
- (2) A partial derogation (i.e. quarterly reporting until January 2021) will be granted to the credit unions that are outside the scope of the full derogation in (1).
- (3) No resident banks will be granted a full or partial derogation.

1.3 Reduced reporting derogations

Annex II of the AnaCredit Regulation states that a small number of the statistical reporting requirements may be reduced if specific conditions apply. The following four cases describe the specific conditions for which some credit data may not be required:

- Observed agents that are not resident in a Reporting Member State;
- Observed agents not subject to capital requirements;
- Fully derecognised instruments being serviced; and
- Instruments originating prior to 1 September 2018.

The Regulation states that some of these reductions are at the discretion of NCBs and some are simply not required. The details on which attributes may not be reported under the specific conditions above are detailed in the spreadsheet "Central Bank of Ireland Position on Reduced Reporting (Annex II Regulation)". The spreadsheet is available on the [AnaCredit webpage](#) of the Central Bank's website.

Note, the group "Observed agents that are not resident in a Reporting Member State" has already been omitted from reporting to the Central Bank so no data are required in any event.

Table 2: Reporting Frequency and Reporting Deadlines

<i>Return</i>	<i>Dataset Template</i>	<i>Code</i>	<i>Frequency</i>	<i>Deadline</i>	<i>Reporting Population</i>
ACPRD	Counterparty Reference	CPRD	Monthly (Quarterly for Credit Unions)	T + 7	All Credit Institutions
ACR1B	Instrument	T1M1	Monthly	T + 15	All Credit Institutions (except Credit Unions)
	Financial	T1M2			
	Counterparty - Instrument	T1M3			
	Joint Liabilities	T1M4			
	Protection Received	T2M1			
	Instrument - Protection	T2M2			
	Counterparty Risk	T2M3			
	Counterparty Default	T2M4			
ACR2B	Accounting	T2Q1	Quarterly	T + 20	All Credit Institutions (except Credit Unions)
ACR1CU	Instrument	T1M1	Quarterly	T + 15	Credit Unions only
	Financial	T1M2			
	Counterparty - Instrument	T1M3			
	Joint Liabilities	T1M4			
	Protection Received	T2M1			
	Instrument - Protection	T2M2			
	Accounting	T2Q2			

1.4 Reporting frequency

The reporting frequency are detailed in Table 2. The reporting frequency are:

- The AnaCredit Counterparty return must be submitted:
 - Monthly for all reporting agents except credit unions;
 - Quarterly for credit unions.

The return should include any new counterparties or updates to the roles or attributes of existing counterparties.

- Eight additional templates, grouped into the ACR1B return, must be reported monthly for all reporting agents except credit unions. The Accounting template should be reported quarterly in the ACR2B return.
- For Credit Unions, the ACR1CU return must be reported quarterly.

1.5 Reporting deadline

The reporting deadlines are detailed in Table 2. The reporting deadline for the banks are:

- Counterparty Reference dataset (ACPRD return) is the 7th working day after the last working day of the reference period (T+7);
- ACR1B return is the 15th working day after the last working day of the reference period (T+15);
- ACR2B return is the 20th working day after the last working day of the reference period (T+20).

For Credit Unions the reporting deadlines are:

- Counterparty Reference dataset (ACPRP return) is the 7th working day after the last working day of the reference period (T+7) on a quarterly basis;
- ACR1CU return is the 15th working day after the last working day of the reference period (T+15);

Working days exclude weekends and Irish public holidays. A schedule of reporting deadlines for all returns is published on the Central Bank website.

1.6 First reporting

Counterparty reference data must be transmitted to the ECB six months prior to the first transmission of credit data. In order to meet this deadline, the Regulation permits the Central Bank to collect the counterparty data from 31st December 2017. A facility to submit any available data prior to that, on a voluntary basis, will also be made available from 31 October 2017. The deadline for first submission of all counterparty reference data (except for credit unions) is 31st January 2018, with reference to data as of 31st December 2017.

Credit unions are required to begin submitting the Counterparty reference data with reference to positions at end-September 2018 with the first reporting date at 9th October 2018 (T+7 working days).

The remaining returns will have first reporting with reference to 30th September 2018. The first reporting deadline is:

- 19 October 2018 for the ACR1B and ACR1CU; and
- 26 October 2018 for the ACR2B.

1.7 Method of reporting and historical resubmissions

The returns must be submitted via the Central Bank's Online Reporting System (ONR). Reporting agents will log onto ONR (at <https://onlinereporting.cbfsai.ie>) and navigate to the Statistics business view. The new AnaCredit returns will be available under this business area.

The reporting agent is required to upload a single Counterparty Reference Return (ACPRD) on behalf of themselves and where applicable each of their observed agents. In contrast to the counterparty data, reporting agents must upload a separate ACR1B and ACR2B return on behalf of themselves and, where applicable, each of their observed agents.

The file format will be XML. Details on the XML file specifications are available on the [AnaCredit webpage](#) of the Central Bank's website.¹

The file and data will undergo a number of validations at file level which must be passed or it will result in a 'File rejection'. These validations include:

- File name is valid;
- File size (maximum of 160MB for zip files);
- File extension is valid (.XML);
- File and schema validations including data specifications;
- Consistency checks.

The naming convention for the files is as follows:

- **AnaCredit Counterparty reference data (ACPRD return)**

"CCCCCC_YYYYMMDD_ACPRD.xml"

Where

- CCCCCCC is the reporting agent identifier (see [section 4.2.1](#));
- YYYYMMDD is the reference date of the return (e.g. 20180131); and
- The text "ACPRD" is the file code, which is short for the AnaCredit Counterparty Reference Data.

- **Credit and Credit Risk Data (ACR1B, ACR2B, ACR1CU returns)**

"CCCCCC_XXXXXXXXXXXXXXXXXXXXX_YYYYMMDD_ZZZZ.xml"

Where:

- CCCCCCC is the RA Code;
- XXXXXXXXXXXXXXXXXXXXXXXX is the Observed Agent ID. Maximum 20 alphanumeric characters;
- YYYYMMDD is the reference date of the return (e.g. 20180131); and
- ZZZZ is the relevant file code (i.e. "ACR1B", "ACR2B", or "ACR1CU").

The file level validations are detailed in the relevant reporting template and rules file.

After the data has passed 'File level' validation, and the file has been accepted, the data will be further validated on a record basis, which may result in additional queries or rejection of individual records. These rules are detailed in the relevant reporting templates and rules document. This may result in resubmission of individual records.

¹ The XML schema for the ACPRD Return is available on the [AnaCredit webpage](#). The ACR1B, ACR2B and ACR1CU XML Schemas were released in July 2017.

Records that have fully passed the record level rules will also undergo further plausibility and analytical checks within the Central Bank, and this may also result in further queries.

The results of these validations will be presented via the Central Bank's online reporting platform. The results will also be available for download in Microsoft Excel or XML format.

A full list of the validations are included in the relevant Template and Rules spreadsheet on the [AnaCredit webpage](#) of the Central Bank's website.

It is expected that validation will change from time-to-time and any changes will be communicated to reporting agents. **Please note that at the time of initial release, the checks that will be conducted by the ECB are not yet finalised and future releases of the validation rules should be expected.**

Minimum standards

The required statistical information shall be reported in accordance with the minimum standards for transmission, accuracy, conceptual compliance and revisions as set out in Annex IV of Regulation (EC) No 1071/2013 of the ECB of 24 September 2013 concerning the balance sheet of the monetary financial institutions sector (Recast) (ECB/2013/33).

Historical Resubmissions

From time to time reporting agents may wish to correct historical data, by resubmitting data for historical reference dates. Where this is the case, the reporting agent should contact the AnaCredit team by mailing anacredit@centralbank.ie. The AnaCredit team will get details of the necessary historical records to be corrected and will issue instructions and indicative timelines of when this may occur.

It is acknowledged that the correction of historical records is outside business –as-usual practices and will require deployment of additional resources from both the AnaCredit team and the reporting agent. Historical reference dates will need to be unlocked and submissions uploaded individually, with any feedback file issues being addressed before later historical dates may be corrected. Once such dates have been confirmed with the AnaCredit team, details of how to complete this process will be provided to the reporting agent.

1.8 The concept of institutional units

All counterparties that are required to be reported to AnaCredit are defined as institutional units.

An institutional unit is an economic entity characterised by decision-making autonomy in the exercise of its principal function. A resident unit is regarded as constituting an institutional unit in the economic territory where it has its centre of predominant economic interest, if it has decision-making autonomy and either keeps a complete set of accounts, or is able to compile a complete set of accounts.

To have autonomy of decision in respect of its principal function, an entity must be:

- a) entitled to own goods and assets in its own right; it will be able to exchange the ownership of goods and assets in transactions with other institutional units;

- b) able to take economic decisions and engage in economic activities for which it is responsible and accountable at law;
- c) able to incur liabilities on its own behalf, to take on other obligations or further commitments and to enter into contracts; and
- d) able to draw up a complete set of accounts, comprised of accounting records covering all its transactions carried out during the accounting period, as well as a balance sheet of assets and liabilities.

Institutional units of credit institutions

A credit institution may consist of one or more institutional units.

- The domestic part of a credit institution is one institutional unit which consists of the institutional unit headquarters and the domestic branch offices;
- The foreign branches of a credit institution are institutional units. A credit institution can have only one foreign branch in a given country. Any number of foreign branch offices (i.e. individual places of business as defined under Article 4(1)(17) of the CRR) set up in the same country by a credit institution with its headquarters in a another country should be regarded as a single foreign branch.

A subsidiary of a credit institution does not form part of the parent institutional unit. A subsidiary is a legal entity in its own right.

Institutional units of counterparties

In the context of AnaCredit, counterparty means an institutional unit that is party to an instrument or to a protection item or has affiliation with such a party.

Unincorporated investment funds

Please note that unincorporated investment funds ("special funds") are counterparties in AnaCredit. Investment funds, which are Unit Trusts, Investment Limited Partnerships, or Common Contractual Funds are considered to be "special funds". Since special funds and their managing financial corporations are deemed to have the same relationship as the foreign branches and domestic part of a legal entity, special funds are expected to be identified in a similar manner to foreign branches.

1.9 Accounting rules

The AnaCredit Regulation stipulates that the accounting data of an observed agent that are reported to AnaCredit should comply with the accounting standard used by the observed agent's legal entity.

Specifically, the accounting standard relevant for any observed agent is the accounting standard used by the credit institution of which the observed agent is part. The accounting standard is relevant for AnaCredit reporting in general and not only in relation to the data attributes in the accounting dataset of the AnaCredit Regulation.

This means in particular that if the observed agent's legal entity is subject to Regulation (EU) 2015/534 (ECB/2015/13), the data are reported in accordance with either International Financial Reporting Standards (IFRS) or national generally accepted accounting principles (GAAP) – depending on which standards are applied by the legal entity to report its individual FINREP templates to its supervisor.

1.10 Currency

All monetary amounts shall be reported in units of euros, with two digits after the decimal point. All foreign-currency data should be valued at the exchange rates published by the Central Bank on the reporting reference date and entered on the return as the euro equivalent of the amount outstanding on that day. If an exchange rate is not provided for a particular currency, institutions should use the same rate as that used in their own internal accounts.

1.11 Special reporting values

Some data attributes are not required or not applicable under certain circumstances. For example,

- a CRO identifier is not applicable if the counterparty is not resident in Ireland; or
- interest rate cap is not required for fully derecognised instruments being serviced (under the reduced reporting outlined in Annex II of the AnaCredit Regulation).

In such circumstances, specific values should be reported to indicate the reason for no value being reported. Under no circumstances should any attribute be left blank or empty.

Irish AnaCredit reporting comprises four types of values:

- a value as defined in the Template and Rules spreadsheet;
- “NA” (Non-applicable);
- “NR” (Not required);
- “NP” (Not reported).

Please note that in the case of attributes that take the “Date” format, a date value must always be reported. The following dummy date values should be used to represent a given special value where applicable:

- “9999-01-01” to represent ‘Not required’;
- “8888-01-01” to represent ‘Non-applicable’;
- “7777-01-01” to represent ‘Not reported’.

The respective data specification for each attribute contained in the template and rules documents, details which special values can be reported for which attribute. Note, “NP” (Not reported) is only an option for certain attributes in the Counterparty Reference data return (see further details below).

The aim of this section is to give a high level overview of the meaning of these special values. Specific situations in which a data attribute may be reported as a special value are dealt in Section 4 and 5 on the individual data attributes.

Please note that reporting a data attribute as “NA” (Non-applicable) means that the data attribute has been carefully considered in a given situation and it has been confirmed that the data attribute does not apply. In all circumstances, the attribute is deemed non-applicable because the data simply do not exist. For example, if a reporting agent reports a value of “NA” (Non-applicable) for the attribute “Legal entity identifier (LEI)”, this will be understood as meaning that an LEI does not exist for that counterparty.

In certain circumstances, some attributes are not required. For example, the attribute “Accounting standard” is only required to be reported if the counterparty is resident in a Reporting Member State and if the counterparty role is that of reporting agent. Therefore, in all other scenarios, this attribute should be reported with a value “NR” (Not required). Note the distinction between “NA” (Non-applicable) and “NR” (Not required) here. The reporting agent should select “NR” (Not required) because that is the legitimate reason why a value is not being provided for the attribute. A value of “NA” (Non-applicable) would imply that data relating to the accounting standard does not exist for the counterparty, which will not necessarily be true.

The data specification details in the accompanying Template and Rules spreadsheets clarify which attributes permit reporting of these special values. Furthermore, scenarios in which these special values may be reported are provided in Sections 4 and 5.

Finally, it should also be noted that for certain attributes a value of “NP” (Not reported) may be provided by the Reporting Agent. **Such a value will be interpreted as a declaration that the Reporting Agent cannot satisfy its reporting obligation for the attribute and counterparty in question.**

The inclusion of a “NP” (Not reported) option will allow a Reporting Agent submit all other information, without the file being rejected by the Online Reporting System.

This value is only permitted for certain attributes in the Counterparty Reference Data return and is not permitted to be reported for attributes that are deemed critical to the successful identification and matching of counterparties by the Central Bank, such as a number of the identifiers, name, country of residence and institutional sector. Details of the attributes for which a value of “NP” (Not reported) may apply are provided in the “File rejection – DS” sheet of the Counterparty Template and Rules spreadsheet.

Where the “NP” (Not reported) value is reported to the Central Bank, and the data are not available to the Central Bank from alternative sources, the Reporting Agent will ultimately be responsible for sourcing the relevant data, in order to fulfil its reporting obligation for the attributes in question.

Please refer to the Appendix III for further information on reporting the special values.

1.12 Reporting threshold

In order to maximise the potential use of the AnaCredit data, the Central Bank has decided not to apply a threshold to the data. All AnaCredit-eligible instruments, where the debtor is a legal entity, should be reported to the Central Bank, regardless of the size of the exposure. This will ensure that the data can be re-used for other statistical purposes and are suitable for a broader analysis of the Irish financial sector, with the ultimate goal of reducing (or eliminating) other reporting requirements. If a reporting threshold was applied, the longer term benefits of reducing the industry reporting burden and ad-hoc queries would not be achieved.

In practice, it may be necessary to apply a very low threshold and/or to rely on reporting agent discretion, to ensure that data reported to the Central Bank are meaningful, and do not include dormant accounts or other accounts with very low balances. If such a situation is required by a reporting institution, they should notify the Central Bank of the proposed approach. In general, a deviation from a zero threshold will only be permitted if the change results in a non-material change in the reporting volumes and the economic interpretation of the reporting agents' loan portfolios.

1.13 Legal entity in Ireland

Only legal entities are included in the first phase of AnaCredit. Data on natural persons should not be reported in AnaCredit under any circumstances.

The Irish State is a legal entity.

Other than the State, corporate bodies (also known as “corporations” or “incorporated bodies”) are legal entities as a matter of Irish law. These comprise:

- All companies;
- Bodies created by law, in the form of statutes (such as ESB, CIE and the Central Bank);
- Local authorities (such as county councils); and
- Corporations sole, which are corporations consisting of a single person whose corporate status arises from an office or function (such as the Attorney General and each government Minister). The corporation sole is a distinct legal entity from the person holding the office or function at any particular time, because the person's official and private capacities are separate. In other words, it is the office itself that constitutes the legal entity, not the person who holds the office at any particular time. For example, the office of the Minister for Finance is a corporation sole; but the person holding the office is not a corporation sole.

Unincorporated bodies (such as partnerships and associations) are not generally regarded as legal entities that are capable of acquiring legal rights and obligations in their own right. There are some exceptions to this rule when associations may be deemed to have limited capacity to acquire legal rights and obligations, but such exceptions are limited. In general, unincorporated bodies are not regarded as legal entities as a matter of Irish law.

1.14 Counterparty residency

The distinction between residents and non-residents should be based on the residency of the customer and not on the location of the branch in which the account is maintained.

Any business operating in a State is regarded as a resident of that State irrespective of whether it is owned or controlled by residents or by non-residents of the State.

The residency classification is based on international statistical standards and does not correspond to tax residency.

Please note that the term “resident” (used throughout this document, the AnaCredit Regulation and the AnaCredit Manual) has the meaning of resident in a Reporting Member State (RMS), i.e. a Member State whose currency is the euro. The list of Reporting Member States are listed in the table below. Countries outside the euro area may become Reporting Member States in future by incorporating the provisions of the AnaCredit Regulation into their national law. Six countries have stated their intention to join AnaCredit in the future, but to date none have formally joined². All Central Bank guidance documentation will be updated to reflect any future changes to the composition of the Reporting Member States.

List of Reporting Member States	
Code	Description
AT	Austria/ÖSTERREICH
BE	Belgium/BELGIQUE-BELGIË
CY	Cyprus/Kýpros
DE	Germany/DEUTSCHLAND
EE	Estonia/EESTI
ES	Spain/ESPAÑA
FI	Finland/SUOMI
FR	France
GR	Greece/Ellada
IE	Ireland
IT	Italy/ITALIA
LT	Lithuania/LIETUVA
LU	Luxembourg
LV	Latvia/LATVIJA
MT	Malta
NL	Netherlands/NEDERLAND
PT	Portugal
SI	Slovenia/SLOVENIJA
SK	Slovakia/SLOVENSKO
HR	Croatia

² Bulgaria, Czech Republic, Hungary, Romania and Sweden.

1.15 Counterparty identifiers

To ensure the unique identification of all AnaCredit counterparties, it is imperative that reporting agents provide the following information for all counterparties:

- (1) **Internal Counterparty identifier:** An identifier applied by the reporting agent to uniquely identify each counterparty. Each counterparty must have one counterparty identifier. This value will not change over time and cannot be used as the counterparty identifier for any other counterparty. This is the reporting agent's internal counterparty identifier.

This ensures the unique identification of a counterparty, within an individual reporting agent and all of its observed agents.

- (2) **National identifier:** A commonly used identification code which enables the unambiguous identification of a counterparty or of the legal entity of which the counterparty forms part within its country of residence.

This ensures the unique identification of a counterparty across all reporting agents.

For an Irish resident counterparty, the **Company Registrations Office (CRO) number** for the legal entity must be provided if it exists. To the best of our knowledge, this is the only national identifier that is public, i.e. it is freely accessible by the Central Bank, reporting agents and the counterparty itself. Therefore, if a CRO number exists, then it is available, and must be reported.

If a CRO number does not exist, then another identifier can be provided. One such example is the VAT number, although other identifier types may also exist and can be reported.

Furthermore, the LEI code should also be reported if it exists. Full guidance on the reporting of national identifiers is available in the Counterparty Template and Rules spreadsheet and Section 4 of these notes.

For non-Irish resident counterparties, a list of commonly used national identifiers for other countries is available. Please refer to this list and request the relevant identifier from the non-Irish resident counterparty.

1.16 Other identifiers

In addition to the data attributes, each reporting dataset contains a number of internal identifiers. These identifiers ensure that each entry can be uniquely identified by one or a combination of identifiers in a table. The identifiers also help identify the relationship between datasets. The internal identifiers (in addition to those in Section 1.15) are:

- Contract identifier;
- Instrument identifier;
- Protection identifier; and
- Protection provider identifier.

Table 3: Overview of internal identifiers

	Instrument dataset	Financial dataset	Accounting dataset	Counterparty - Instrument data	Joint Liabilities dataset	Instrument - Protection dataset	Protection received dataset	Counterparty Risk dataset	Counterparty Default dataset	Counterparty Reference dataset
Reporting agent identifier	X	X	X	X	X	X	X	X	X	X
Observed agent identifier	X	X	X	X	X	X	X	X	X	
Counterparty identifier				X	X		X	X	X	X
Contract identifier	X	X	X	X	X	X				
Instrument identifier	X	X	X	X	X	X				
Protection Provider identifier							X			
Protection identifier						X	X			

Further details on the identifiers is contained in Section 2 of the ECB AnaCredit Reporting Manual – Part II. High level definitions are provided below:

Table 4: Definition of Internal Identifiers

Identifier Name	Definition
Contract identifier	An identifier applied by the reporting agent to uniquely identify each contract. Each contract must have one contract identifier. This value will not change over time and cannot be used as the contract identifier for any other contract.
Instrument identifier	An identifier applied by the reporting agent to uniquely identify each instrument under a single contract. Each instrument must have one instrument identifier. This value will not change over time and cannot be used as the instrument identifier for any other instrument under the same contract.
Protection identifier	An identifier applied by the reporting agent to uniquely identify each protection used to secure the instrument. Each protection must have one protection identifier. This value will not change over time and cannot be used as the protection identifier for any other protection.
Protection provider identifier	Counterparty identifier for the protection provider. If the protection provider is a natural person, the protection identifier is reported as “NA” (Non-applicable).

Box 1: Items of National Discretion

The AnaCredit regulation outlines a number of areas where national discretion may be used by National Central Banks (NCBs). This Box outlines some of the high-level decision made by the Central Bank.

1. *Derogations*

Article 16 of the Regulation allows for derogations to be applied to small reporting agents.

- A full derogation will be granted to a number of credit unions. The total combined contribution of credit unions to the total outstanding amount of loans reported under the BSI Regulation is in excess of 2%. Therefore, a number of credit unions will be obliged to report. No resident banks will be granted a full derogation.
- A partial derogation (i.e. quarterly reporting until January 2021) will be granted to the credit unions that are outside the scope of the full derogation in (1). No resident bank will be granted a partial derogation.

2. *Feedback loop to reporting agents*

Article 11 of the Regulation gives the Central Bank the right to provide credit data to reporting agents by establishing or enhancing feedback loops to reporting agents. Following consultation with stakeholders, the Central Bank has decided not to establish such a feedback loop in this first phase of the AnaCredit project. The Irish Central Credit Register (CCR) will provide a credit register service to Irish credit institutions.

3. *Reporting threshold*

In order to maximise the potential use of the AnaCredit data, the Central Bank has decided not to apply a threshold to the data. All AnaCredit-eligible instruments, where the debtor is a legal entity, should be reported to the Central Bank, regardless of the size of the exposure.

4. *Foreign branches located outside the euro area*

The Central Bank has taken the decision to exclude these Observed Agents that are not resident in euro area countries. Reporting agents are not required to include data on such entities in the AnaCredit reporting to the Central Bank.

5. *Reporting by/for foreign branches*

Reporting agents that are foreign branches (i.e. a credit institution resident in Ireland that is a branch of a foreign credit institution) should report all AnaCredit data relating to their own activities.

Reporting agents that have foreign branches resident in another euro area country should report all AnaCredit data relating to their own activities and data relating to the activities of those foreign branches.

In the event that both the branch and its parent credit institution are resident in euro area countries, these guidelines imply that there will be double reporting of data relating to foreign branches, as the data will be reported to both the “home” and “host” NCB. The Central Bank requires all data relating to foreign branches operating in Ireland, in order to maximise the potential uses of these data.

The Central Bank has engaged with other relevant NCBs to agree arrangements with the aim of minimizing or eliminating double reporting, in so far as possible. All credit institutions impacted by such arrangements have been informed of their reporting obligations to the Central Bank. Credit institutions are advised to contact relevant NCBs to confirm reporting obligations to that NCB.

Annex III of the AnaCredit regulation specifies the requirements for each data attribute in the counterparty data, including some that are at the discretion of the relevant NCB. These have been assessed and many of the attributes will not be required by the Central Bank. For full details on the attributes required see the Counterparty Template and Rules spreadsheet

Please note, Annex II of the Regulation outlines a number of non-counterparty data attributes (e.g. payment frequency or interest rate cap) that are also subject to national discretion. Details on these will be released along with the relevant reporting templates.

Section 2: Instruments Covered

While these Notes on Compilation specifically deal with reporting of counterparty reference data, it is a requirement to first identify eligible instruments before counterparties can be identified. This section outlines the instruments that are covered in AnaCredit reporting to the Central Bank. More detailed guidance on classifying individual instruments will be made available in the relevant template notes.

2.1 Types of instruments

The term “credit” is defined broadly under the Regulation. Any item by means of which credit is extended to a debtor is referred to as an instrument. However, credit derivatives or strict off-balance sheet items (such as financial guarantees) are excluded from the scope of the Regulation.

Instruments to be collected comprise outstanding financing under any of the following types of credit:

- Reverse repurchase agreements
- Deposits other than reverse repurchase agreements
- Overdraft
- Credit card debt
- Revolving credit other than overdrafts and credit card debt
- Credit lines other than revolving credit
- Trade receivables
- Financial leases
- Other loans

Any instruments which do not fall under any of the types listed above are not considered in AnaCredit. Further details on these instruments is available in Part II of the ECB AnaCredit Manual.

2.2 Creditor and servicer

This section considers the activity of observed agents as creditors or servicers and provides a description of how to identify the instruments subject to reporting based on the various concepts referred to in Article 4 of the AnaCredit Regulation.

While the creditor is the counterparty bearing the credit risk of an instrument, the servicer is the counterparty responsible for the administrative and financial management of an instrument. Although for many instruments the same counterparty typically acts as both the creditor and the servicer, there are instruments for which the two roles are assumed by different counterparties.

Instruments should be reported to AnaCredit where:

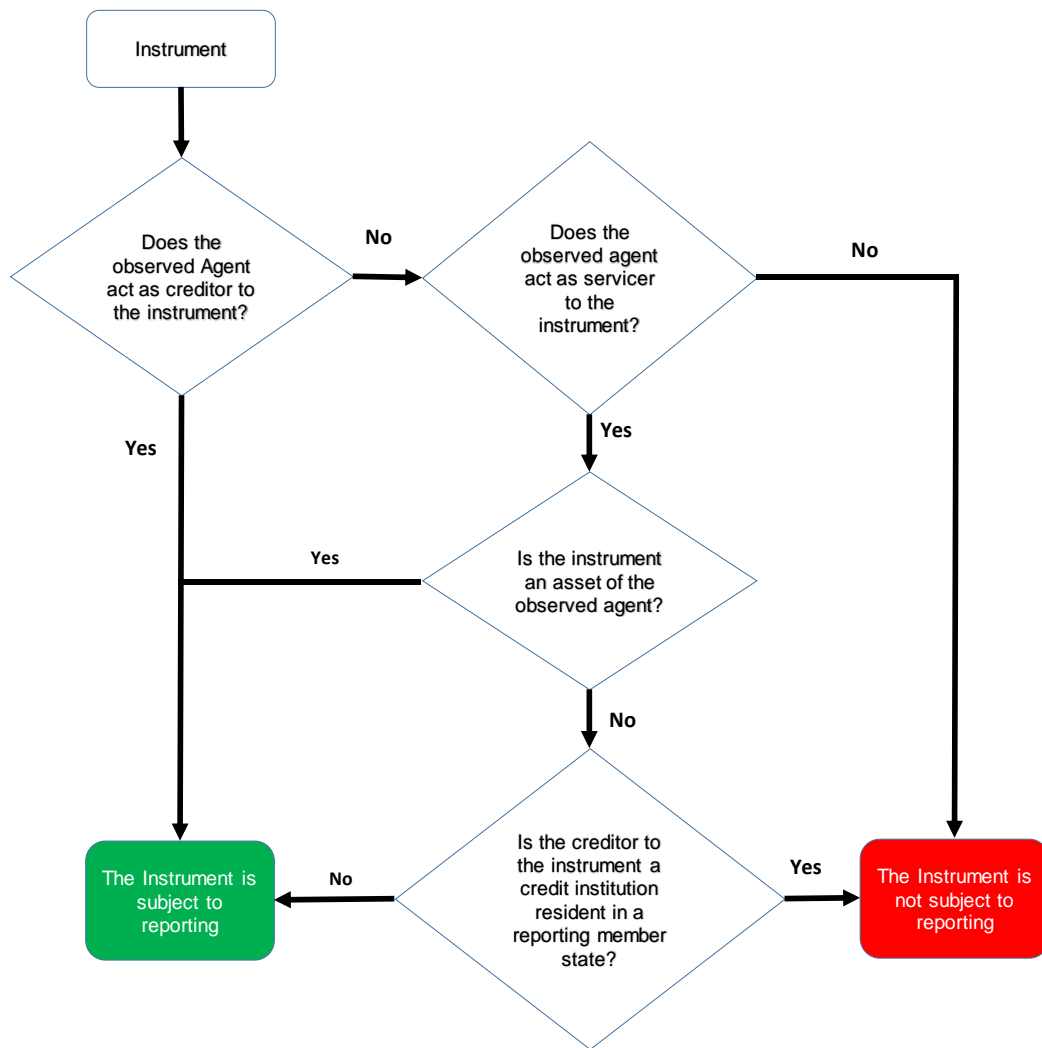
- i. the observed agent acts as the creditor;

- ii. the observed agent acts as the servicer if the creditor is a third party (to the observed agent), although in this case the reporting obligation is waived if the creditor is a credit institution (or a part of a credit institution) resident in a Reporting Member State.

Table 5: Possible Reporting Obligations for Creditors and Servicers

Case	Reporting
Observed agent is the creditor and the servicer	Instruments in this class have to be considered for reporting to AnaCredit.
Observed agent acts as creditor but does not act as servicer	Instruments in this class have to be considered for AnaCredit reporting.
Observed agent acts as servicer but does not act as creditor	Instruments in this class have to be considered for reporting as they may be relevant. However, whether instruments are actually required to be reported depends on whether or not they are assets of the observed agent (i.e. when the observed agent should report these instruments as assets in accordance with the applicable accounting standard) or whether or not the third party that acts as creditor of those instruments is a (part of a) resident credit institution. See decision tree below for further details.
Observed agent acts as neither creditor nor servicer	No cases relevant for AnaCredit reporting and is not considered further.

Chart 1: Decision tree for instruments in which observed agent acts as creditor or servicer.



Please note that although instruments to which the observed agent acts as creditor generally constitute assets of the observed agent, it is irrelevant whether or not an instrument is an asset of the observed agent under the relevant accounting rules, as long as the observed agent acts as creditor of such instruments. For example, intracompany loans to which the observed agent acts as creditor fulfil the condition for reporting.

Example 1: Synthetic securitisations where the credit risk of a portfolio of instruments is transferred by means of a credit protection agreement, without transferring the ownership of the securitised instruments, i.e., leaving the underlying instrument in the ownership of the observed agent and on its balance sheet. More specifically, although the credit risk of the observed agent is mitigated by a credit derivative or a financial guarantee, the observed agent retains the right to receive the payment from the debtor of the instrument and therefore meets the definition of a creditor. Consequently, the observed agent acts as creditor and servicer of instruments subject to synthetic securitisations. Instruments in this class have to be considered for reporting to AnaCredit.

If the reporting obligation in respect of an instrument is not triggered by an observed agent acting as creditor of the instrument, it may still be triggered by an observed agent acting as servicer.

The following examples are to be reported:

- Instruments which are subject to a traditional securitisation in which a FVC acquiring the instruments acts as creditor and the observed agent acts as servicer. The instrument must be reported by the observed agent as the instruments are now held by a legal entity which is not a credit institution resident in a Reporting member state (as per Article 4(1)(a)(iv)(ii) of the AnaCredit regulation).
- Intracompany loans in which the observed agent acts as servicer but does not act as creditor must be reported by the observed agents. The reason being, the instrument was granted to other institutional units of the same legal entity that the observed agent is part of and gave rise to credit risk in the past (as per Article 4(1)(a)(iv)(i) of the AnaCredit regulation).
- Please note that instruments that are assets of the observed agent to which the observed agent acts as servicer (but not as creditor) are considered for AnaCredit reporting.

2.3 Instruments relevant for the activity as creditor

This section considers in more detail instruments in which the observed agent acts as creditor.

Depending on the relevant accounting standard, an instrument to which the observed agent acts as creditor may be an asset of the observed agent or an off-balance sheet item.

2.3.1 Instruments that are assets of the observed agent

In general, an observed agent may be the legal and/or economic owner of an asset. The economic owner bears the risks and is entitled to claim the benefits associated with the asset. The economic owner thus treats the instrument as an asset. Therefore, the economic owner has to report to AnaCredit according to Article 4(1)(a)(i) and Article 4(1)(a)(ii).

If the legal owner is not the economic owner of the instrument, however, the legal owner does not assume the benefits and risks associated with the instrument. In the case of fiduciary loans, the legal owner may nevertheless treat the instrument as an asset on its balance sheet. If this is the case, the legal owner has a reporting obligation to AnaCredit according to Article 4(1)(a)(ii) even though the instrument does not give rise to credit risk for the legal owner.

2.3.2 Instruments not recognised under the relevant accounting standard

Instruments in which the observed agent acts as creditor but which are not recognised under the relevant accounting standard are not assets of the observed agent. The general principle is that the category of instruments in which the observed agent acts as creditor is broader than the category of instruments that are assets of the observed agent. Such instruments include:

- a) intracompany loans, where the observed agent grants a loan to another institutional unit of the legal entity of which the observed agent is part;

- b) instruments that are written off, in which the observed agent still has a claim on a third party (debtor) but the instruments are no longer recognised under the relevant accounting standard.

Such instruments are subject to AnaCredit reporting.

As regards written-off instruments in particular, such instruments have to be reported as long as the observed agent still has a claim on the debtor.

2.4 Instruments relevant for the activity as servicer

This section considers instruments in which the observed agent acts only as servicer where the instrument is not subject to reporting by the creditor of the instrument.

Avoiding double reporting

Instruments that are serviced (but not held) by an observed agent and held by another observed agent are in principle, subject to double reporting. However, the AnaCredit Regulation aims to avoid double reporting in such cases by requiring that serviced instruments be reported only on condition that they are not held by another observed agent. More specifically, if an instrument serviced by an observed agent is held by a third party credit institution resident in a Reporting Member State, the credit institution holding the instrument is responsible for reporting the instrument and not the servicer.

Securitised or otherwise transferred instruments except synthetic securitisations

In the case of traditional securitisations the economic ownership of the instrument is transferred, generally leading to derecognition of the instrument by the originator and recognition by the new owner on their balance sheet. The transferee, which is the new owner of the instrument from an economic perspective, is to be recognised as the creditor. If the observed agent retains servicing rights in respect of the transferred instruments, such instruments therefore should in principle be considered for AnaCredit reporting.

Fiduciary instruments

From the perspective of an observed agent, fiduciary instruments are those for which the observed agent acts in its own name but on behalf of and with the risk borne, by a third party. The third party who is the economic owner of the instruments is therefore the creditor. The observed agent, who is solely responsible for the administrative and financial management of the instruments, is the servicer of such instruments.

Fiduciary instruments in which the observed agent acts only as servicer are generally subject to AnaCredit reporting. However, the exact reporting obligation depends on their accounting treatment.

Fiduciary instruments should be reported to AnaCredit according to Article 4(1)(a)(ii) or (iii) of the AnaCredit Regulation if they are treated as assets, regardless of whether or not the creditor is an observed agent.

In particular, non-asset fiduciary instruments are only required to be reported to AnaCredit if the servicer (trustee) to such instruments is an observed agent whereas the creditor (trustor) is not a credit institution (or a foreign branch of a credit institution) resident in a Reporting Member State.

Example

This example considers a fiduciary instrument from the perspectives of the trustor and the trustee:

- trustor C holds an instrument which gives rise to credit risk;
- the instrument is serviced by trustee A, who acts as trustee for trustor C;
- counterparty B is the debtor of the instrument; counterparty B is a legal entity.

The fiduciary instrument is first considered from **the trustor C perspective**:

If trustor C is an observed agent then reporting of the instrument is triggered by Article 4(1)(a)(i) – the instrument gives rise to credit risk for the observed agent.

Conclusion: the reporting agent relevant for the observed agent (trustor C) reports the instrument.

The instrument is now considered from **the trustee A perspective**:

Scenario 1 – the instrument is not an asset of trustee A in accordance with the relevant accounting standard.

If trustee A is an observed agent, reporting of the instrument is triggered if trustor C is not a credit institution (or a foreign branch of a credit institution) resident in a Reporting Member State. In such cases reporting is exclusively triggered by Article 4(1)(a)(iv)(ii).

If trustor C is a credit institution (or a foreign branch of a credit institution) resident in a Reporting Member State, the instrument is not required to be reported by the reporting agent relevant for the observed agent (trustee A).

Scenario 2 – the instrument is an asset of trustee A recognised under the relevant accounting standard.

If trustee A is an observed agent, reporting of the instrument is triggered by Article 4(1)(a)(ii). It is also irrelevant whether or not trustor C is a credit institution (or a foreign branch of a credit institution) resident in a Reporting Member State.

2.5 Other instrument-related aspects for consideration

This section focuses on certain features of instruments that affect their reporting to AnaCredit.

- ***Instruments recorded on the liabilities side of the balance sheet***

Instruments that give rise to credit risk to the observed agent are either assets of the observed agent or are not recorded on the balance sheet. Such instruments are never liabilities of the observed agent, however.

Note, that while credit balances on current accounts are not subject to AnaCredit reporting, the reporting of current accounts with an agreed credit limit is triggered by the existence of the credit limit.

Current accounts which are not associated with an agreed credit limit are subject to AnaCredit reporting only if they are in debit at a reporting reference date.

- ***Instruments that are not eligible***

Instruments which are held or serviced by the observed agent but which are not one of the types of instrument referred to in Article 1(23) of the AnaCredit Regulation do not fall within the scope of the collection.

- ***The commencement of the reporting of an instrument***

An instrument first becomes subject to reporting at the moment at which the creditor enables the debtor to draw funds after entering into a legally binding agreement with the debtor.

Moreover, whether the creditor commits to the debtor in irrevocable or revocable terms is irrelevant for the commencement moment of the reporting of an instrument.

- ***Instruments comprising off-balance-sheet amounts***

The guidelines around commencement of reporting imply that certain off-balance sheet instruments will be subject to reporting i.e. instruments where funds have not yet been drawn down.

- ***Intracompany loans***

Intracompany loans held by the observed agent

Intracompany loans are subject to reporting primarily because the observed agent that extends such loans acts as creditor of these instruments. Furthermore, loans between institutional units are also reported in the context of BSI statistics (as collected in the RS2 return in Ireland).

Intracompany loans provided between branch offices of a credit institution located in the same country (as opposed to foreign branches in different countries) are not subject to AnaCredit reporting because these are loans made within a single institutional unit. This is because units of a single entity located in a single country form a single institutional unit, and any transactions within institutional units are not recognised in AnaCredit.

Serviced intracompany loans

The AnaCredit Regulation also requires intracompany loans, in which the observed agent acts only as servicer, to be reported. In particular, intracompany loans where the observed agent, is a servicer (but not a creditor) fulfil the condition in Article 4(1)(a)(iv)(i).

- ***Reporting instrument to end quarter months***

In general, only relevant instruments eligible for reporting at end-month should be reported in the AnaCredit submission. However, should an instrument be no longer eligible for reporting due to being written-off or forgiven, the loan must continue to be reported until the next end-quarter submission (i.e. reference end-March, end-June, end-September and end-

December). A loan that is no longer an eligible instrument due to a repayment does not need to be reported until the end-quarter.

The requirement to continue reporting written-off or forgiven loans up to the end of the quarter is necessary as the information on the write-off is only reported on a quarterly basis.

- ***Written-off loans***

A write-off is the full or partial write-down of the carrying amount of an instrument. In the case of a full write-off, the operation leads to the removal of the instrument from the balance sheet. Instruments are often written off when no future economic benefit is expected from them, for example when a loan is considered to be uncollectible, even though the institution may retain the claim against the debtor.

An eligible instrument that is written-off (either fully or partially) should be reported to AnaCredit as long as the observed agent retains a claim against the debtor (i.e. the loan is not forgiven).

Section 3: Counterparty Roles

This section describes counterparties in the context of AnaCredit and provides definitions for all counterparties that are required to be reported in AnaCredit.

3.1 Identifying counterparties

In the context of AnaCredit, counterparty means an institutional unit that is a party to an instrument or to a protection item, or has an affiliation with such a party.

The AnaCredit Regulation stipulates that all counterparties (that are not natural persons) which take any of the following roles are relevant counterparties and should be registered in the counterparty reference data:

- the reporting agent;
- the observed agent;
- the debtor of the instrument;
- the creditor of the instrument;
- the servicer of the instrument;
- the originator of the instrument, if the instrument is subject to securitisation;
- the protection provider that provides protection (if any) to the instrument;
- the head office undertaking of (a foreign branch that is) a debtor of at least one instrument originated at or after 1 September 2018;
- the immediate parent undertaking of any debtor of at least one instrument originated at or after 1 September 2018;
- the ultimate parent undertaking of any debtor of at least one instrument originated at or after 1 September 2018.

Natural persons are not registered in AnaCredit irrespective of their role.

When identifying counterparties in AnaCredit, the following steps essentially need to be considered:

- a) if reporting an instrument to AnaCredit as of a given reporting reference date, all counterparties should be identified that take any of the following roles:
 - debtor of the instrument;
 - creditor of the instrument;
 - servicers of the instrument;
 - originator, if the instrument is subject to securitisation;

- b) if there is a protection item securing the instrument, the protection provider of the protection item should be identified;
- c) once all counterparties taking the role of debtor with at least one instrument originated at or after 1 September 2018 have been identified, the following information is required:
 - the head office undertaking of the debtor;
 - the immediate parent undertaking of the debtor (if any);
 - the ultimate parent undertaking of the debtor (if any);
- d) ultimately, all counterparties identified along steps a), b) and c) should be registered in the counterparty reference data as of the given reporting reference date;
- e) however, the requirement in point d) above is waived for all counterparties which are natural persons, because natural persons are not identified in AnaCredit.

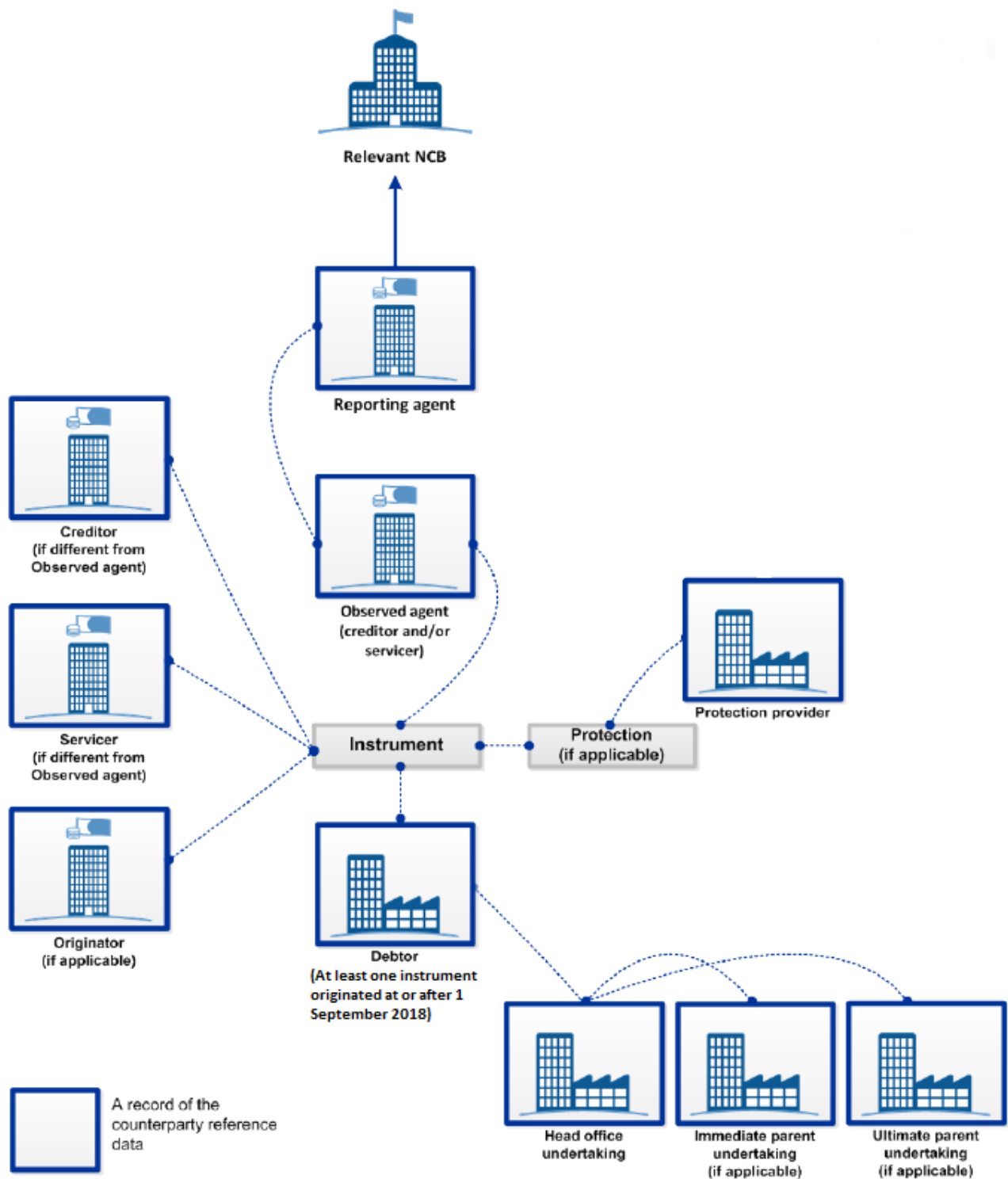
For all counterparties identified and recorded in the respective datasets, the counterparty reference data should contain a single data record describing the counterparty.

The exact attributes to be reported for any counterparty is dependent on the counterparty role (or combination of roles) and the residency on the counterparty. The Counterparty Template and Rules spreadsheet specifies the requirements for counterparties.

NOTE: Multiple protection providers

It has been recognised that in the case of financial guarantees provided by several (joint) guarantors, the AnaCredit data model does not allow all the protection providers to be recorded. Consequently, the ECB is due to enhance the data model in the future. Reporting agents are nevertheless advised to identify all protection providers before the enhancement takes place, although only one of them can effectively be received in AnaCredit at present.

The following population diagram illustrates the counterparty roles for which a counterparty reference data record is generally reported (blue squares):



For the reporting of counterparty reference data by a reporting agent, the following principles apply:

1. One record (i.e. one counterparty reference dataset) must be reported which is referring to the reporting agent itself.
2. One record must be reported for the observed agent.
3. One record must be reported for each counterparty playing any of the following roles in the instrument:

- i. creditor,
 - ii. servicer,
 - iii. debtor.
4. Where relevant (i.e. when an instrument is secured with protection or is subject to a securitisation), a record must be reported for each counterparty playing any of the following roles:
 - i. originator,
 - ii. protection provider,when an instrument is secured with protection or is subject to a securitisation.
5. Moreover, the AnaCredit Regulation stipulates that the head office undertaking identifier, the immediate parent undertaking identifier and the ultimate parent undertaking identifier must be reported by the reporting agent for the head office of any debtor with at least one instrument originated at or after 1 September 2018. Therefore, a distinct counterparty reference data report must be reported for each of the following (when relevant)
 - i. head office undertaking,
 - ii. immediate parent undertaking,
 - iii. ultimate parent undertaking.

In the context of AnaCredit, a debtor has a head office undertaking in the following cases:

- the debtor is a foreign branch (of a legal entity);
- the debtor is the domestic part (of a legal entity).

It should be noted that while the concept of head office relates to the relationship between institutional units of belonging to the same legal entity, the concept of immediate and ultimate parent undertaking relates merely to legal entities. Therefore, the immediate and the ultimate parent undertaking are only registered in the counterparty reference data report of the (domestic part of the) head office undertaking, and not in the counterparty reference data report of foreign branches or special funds.

3.2 Counterparty role types

Role 1: Reporting agent

Reporting agent means either a legal entity or a foreign branch that is resident in a Reporting Member State and that is subject to the ECB's reporting requirements pursuant to this Regulation;

Role 2: Observed agent

Observed agent means an institutional unit whose activity as creditor or servicer is reported by the reporting agent. The observed agent is either:

- a) the institutional unit resident in the same country as the reporting agent of which it forms part; or

- b) a reporting agent's foreign branch, resident in a Reporting Member State.

Note, the Regulation stipulates that a reporting agent's foreign branch that is non-resident in a Reporting Member State is also an observed agent. The Central Bank has decided not to collect data from reporting agent's foreign branches that are non-resident in a Reporting Member State.

Role 3: Creditor

A creditor in the AnaCredit Regulation is the counterparty bearing the credit risk of an instrument other than a protection provider, i.e., the creditor is the counterparty that has the right to receive a payment, irrespective of whether the creditor collects the repayments directly or collection is carried out by a third party, which the debtor is unconditionally obliged to make under the instrument, and irrespective of whether or not the lack of payment is mitigated by any protection.

Generally, creditors lend funds to debtors that lead to the creation of one of the instruments referred to in Article 1(23) of the AnaCredit Regulation (or Section 2 of these notes), irrespective of whether the creditor originated the instrument or acquired its economic ownership.

For each instrument reported to AnaCredit, a creditor should be explicitly identified and reported in the counterparty-instrument dataset.

Example 1: Creditors vis-à-vis traditional securitisation transactions

A traditional securitisation is a transfer of an instrument (or pool of instruments, or part thereof) to a Financial Vehicle Corporation (FVC), either by the transfer of legal title or beneficial interest of the instruments from the originator or through sub-participation where one or more sub-participants agree to fund an instrument in return for the right to receive the principal and interest repayments for the instrument.

These are securitisations where the transferee acquires the economic ownership of the instrument, in other words, the legal title or the risk and rewards of the transferred instruments.

In these securitisations, from the moment of the onward transfer, the transferor (i.e. the original creditor) ceases to be the creditor of the instrument and the transferee (i.e. the counterparty that acquires the instrument) becomes the new creditor.

When the original creditor only transfers part of the economic ownership of an instrument, this counterparty remains the creditor to that part of the instrument that it retains. In addition, because this transaction implies a true sale of the part of the instrument that has been transferred, the transferee holds a new instrument in the amount of the transferred part of the original instrument, where the transferee is the creditor to this new instrument (i.e. the transferee acquires its economic ownership).

Role 4 and 5: Debtor

Debtors are separated into one of two counterparty roles. These are (1) debtors where all instruments were originated prior to 1 September 2018; or (2) debtors where at least one instrument

was originated at or after 1 September 2018. The reportable attributes are different for each of the roles (see the Counterparty Template and Rules spreadsheet for full details).

Article 1(12) of the AnaCredit Regulation defines a debtor as the counterparty which has the unconditional obligation to make repayments arising under the instrument. Consequently, and in line with Annex IV of the AnaCredit Regulation, the debtor is the counterparty that generates the credit risk of an instrument.

Accordingly, any counterparty which is unconditionally obliged to make payments under an instrument qualifies as a debtor. For example, granting a credit to an institutional unit makes the institutional unit a debtor under the AnaCredit Regulation, because the institutional unit is a counterparty to the instrument.

An instrument may have one or more debtors from which the creditor has the right to receive a payment or a series of payments. If there are several debtors of the same instrument, a plurality of debtors occurs.

More specifically, a plurality of debtors occurs when two or more counterparties have the unconditional obligation to make repayments arising under the same instrument, irrespective of whether each debtor is (a) fully or (b) partially liable for the instrument. In the context of AnaCredit, debtors are fully or partially liable debtors when they unite, by contract, in making repayment arising under the same contract. Whether a case of fully or partially liable debtors is present depends on the terms in the contract regulating the obligation.

In the case of a plurality of debtors, all the debtors should be identified but only debtors that are not natural persons are actually to be reported to AnaCredit. Only those instruments where the debtor is a legal entity or part of a legal entity are subject to AnaCredit reporting.

Role 6: Protection provider

The term protection provider is defined in Art 1(13) of the AnaCredit Regulation as the counterparty that grants protection against a contractually agreed negative credit event and that bears the credit risk of the negative credit event.

In the context of AnaCredit reporting, every protection item is granted by a protection provider. For example:

- if real estate serves as protection, the owner of the real estate is the protection provider;
- if government bonds owned by a legal entity are pledged to secure an instrument (a loan), the legal entity is the protection provider.

The distinction between the debtor and the protection provider vis-à-vis an instrument is based on who bears the unconditional obligation to make payments under the instrument. In particular, the debtor is the counterparty that is unconditionally obliged to pay, whereas any counterparty that is conditionally obliged to make payments, or to otherwise cede (pledged) protection to the creditor (i.e. upon the occurrence of a certain negative credit event), is the protection provider.

The distinction between a creditor and a protection provider is that under a credit contract a creditor has the right to receive a payment (or series of payments) from a debtor, while a protection provider promises to fulfil the obligations of the debtor if the debtor fails to do so. The protection provider either makes payments or otherwise transfers (pledged) assets to the creditor subsequent to a contractually agreed negative credit event taking place, and may often have the right to recover those funds from the debtor and is entitled to assignment of the creditor's right against the debtor. Nevertheless, the creditor exercises this right in the first place.

Example 2: Creditor and protection provider vis-à-vis securitisation transactions

With regard to instruments that are subject to securitisation, a broad distinction is made between:

- a) Traditional securitisations: In the case of traditional securitisations that are true sales, the transferee becomes the new creditor of the part of the instruments over which it has acquired economic ownership.
- b) Synthetic securitisations: This uses the transfer of the credit risk of an instrument (or pool of instruments, or part thereof), through the use of credit derivatives, guarantees or any similar mechanism to the investors in the financing instruments issued by an FVC.

In the case of synthetic securitisations, the counterparty that assumes the credit risk of an instrument through the use of credit derivatives, guarantees or any similar mechanism is not a creditor but a protection provider. Consequently, if the creditor transfers the instrument to a third party through the use of a guarantee, the transferor is the originator of the instrument and remains the creditor, while the third party becomes a protection provider of the instrument.

Role 7: Head office undertaking

The AnaCredit reporting is based on the concept of counterparty as institutional unit. All counterparties, be it the domestic part or a foreign branch of a legal entity, qualify as institutional units, and every institutional unit has a head office undertaking. This head office undertaking is the legal entity of which the institutional unit is a legally dependent part.

The "Head office undertaking identifier" coincides with the identifier for the domestic part of the legal entity and one single particular counterparty reference data report is to be reported for both, the domestic part and the head office undertaking.

The data attribute "Head office undertaking identifier" is to be reported only for debtors with at least one instrument originated at or after 1 September 2018 that are foreign branches and special funds. Special funds and the financial corporations managing them are deemed to constitute the same relationship as foreign branches and the domestic part of a legal entity.

Consequently, **if a counterparty acting as a debtor is a foreign branch or a special fund**, the counterparty reference data report to be sent to the relevant NCB must include a record on the debtor itself, and a record for its head office undertaking. In the reference data record of the foreign branch (or special fund), the counterparty identifier of the head office undertaking must be reported

in the data attribute “Head office undertaking identifier”, which allows users to link the head office undertaking with its foreign branches/special funds.

If the counterparty acting as debtor is the domestic part of the head office undertaking (not a foreign branch), it is still recommended that the counterparty identifier of the counterparty itself is also reported in the data attribute “Head office undertaking identifier”, indicating that the information on the legal entity is stored in the same counterparty reference data report. In other words, if the debtor is the domestic part of a legal entity, the domestic part itself identifies the head office undertaking to which it belongs, and no duplicate counterparty reference data report is required for the debtor’s head office undertaking.

Table 6. Summary of reporting requirements on head offices

Counterparty type	Reporting requirement
Foreign branch and Special Funds	Report a counterparty record for its head office undertaking. The counterparty identifier of the head office undertaking must be reported in the data attribute “Head office undertaking identifier” of the foreign branch’s own counterparty record.
Domestic part of the head office	The domestic part of the head office, and the head office are the same counterparty. No duplicate report is required if the counterparty identifier of the counterparty is also reported in the data attribute “Head office undertaking identifier”.

Role 8: Immediate parent undertakings

For a counterparty which is the head office undertaking of a debtor with at least one instrument originated at or after 1 September 2018, a separate counterparty reference data report must be reported, referring to the immediate parent undertaking of the head office of the counterparty.

The counterparty identifier of the immediate parent undertaking must be reported in the data attribute “Immediate parent undertaking identifier” of the debtor’s head office undertaking’s counterparty reference data report (hence, not directly in the report of a foreign branch or special fund). This establishes a link between the debtor’s head office undertaking and its immediate parent undertaking.

While every institutional unit has a head office undertaking, not every head office undertaking has an immediate parent undertaking. In case the head office undertaking of the debtor does not have an immediate parent undertaking the immediate parent undertaking coincides with the head office undertaking. Therefore, the counterparty identifier of the head office undertaking must be reported also in the data attribute “Immediate parent undertaking identifier” of the head office undertaking’s report.

The term immediate parent undertaking is defined in Annex IV of the AnaCredit Regulation as the legal entity which is the immediate parent undertaking of the counterparty. The AnaCredit Regulation also specifies that parent undertaking has the same meaning as defined in Article 4(1)(15)(a) of the CRR.

According to Article 4(1)(15)(a) of the CRR parent undertaking means a parent undertaking within the meaning of Articles 1 and 2 of Directive 83/349/EEC.

Role 9: Ultimate parent undertakings

For a counterparty which is the head office undertaking of a debtor with at least one instrument originated at or after 1 September 2018, a separate counterparty reference data report must be reported, referring to the ultimate parent undertaking of the head office of the counterparty.

The counterparty identifier of the ultimate parent undertaking must be reported in the data attribute "Ultimate parent undertaking identifier" of the debtor's head office undertaking's counterparty reference data report (hence, not directly in the reports of a foreign branch or a special fund). This establishes a link between the debtor's head office undertaking and its ultimate parent undertaking.

If the head office undertaking does not have an immediate parent undertaking (and thus also no ultimate parent undertaking), the counterparty identifier of the head office undertaking of the debtor itself has to be reported both in the data attribute "Immediate parent undertaking identifier" and in "Ultimate parent undertaking identifier" of the head office undertaking's counterparty reference data report. In this case, no distinct report has to be submitted for the immediate parent undertaking, nor for the ultimate parent undertaking.

In case the immediate parent undertaking does not have a parent undertaking (i.e. the immediate and ultimate parent undertakings coincide), the counterparty identifier of the immediate parent undertaking of the debtor has to be reported both in the data attribute "Immediate parent undertaking identifier" and in "Ultimate parent undertaking identifier" of the head office undertaking's counterparty reference data report.

The term ultimate parent undertaking is defined in Annex IV of the AnaCredit Regulation as the legal entity which is the ultimate parent undertaking of the counterparty. This ultimate parent undertaking has no parent undertaking. The AnaCredit Regulation also specifies that parent undertaking has the same meaning as defined in Article 4(1)(15)(a) of the CRR.

According to Article 4(1)(15)(a) of the CRR, the parent undertaking means a parent undertaking within the meaning of Articles 1 and 2 of Directive 83/349/EEC.

Role 10: Originator

In the case of instruments registered in the instrument dataset that are subject to securitisation within the meaning of the Regulation (EU) No 1075/2013 (hereinafter referred to as "the FVC Regulation"), the AnaCredit Regulation stipulates that the counterparty acting as the originator of such a securitisation transaction should be identified.

Pursuant to the FVC Regulation, the originator is the transferor of an instrument or pool of instruments, and/or the credit risk of the instrument or pool of instruments to the securitisation structure.

Furthermore, in accordance with the FVC Regulation, a securitisation is a transaction in which an FVC issues financing instruments to investors, and one or more of the following takes place:

- a) an instrument or pool of instruments, or part thereof, is transferred to the FVC either by the transfer of legal title or beneficial interest of those instruments from the originator or through sub-participation;

- b) the credit risk of an instrument or pool of instruments, or part thereof, is transferred through the use of credit derivatives, guarantees or any similar mechanism to the investors.

Whether or not an instrument is subject to securitisation should be indicated accordingly in the data attribute "type of securitisation" in the financial dataset.

Consequently, for such instruments, where the data attribute "type of securitisation" assumes either of the two values (a) "traditional securitisation" or (b) "synthetic securitisation", the counterparty that is the originator in the securitisation transaction should be identified. Conversely, if an instrument is not subject to securitisation, no originator needs to be identified, even when the economic ownership of the instrument has been transferred to a third party which becomes a new creditor and the transferor remains the servicer.

Please note that securitised instruments are typically still serviced by the originator. If this is the case, the originator is also the servicer and the same counterparty thus needs to be registered as both an originator and servicer in the counterparty-instrument dataset.

Role 11: Servicer

Article 1(14) of the AnaCredit Regulation defines a servicer as the counterparty responsible for the administrative and financial management of an instrument.

Please note that the role of servicer is defined more broadly than within the meaning of Regulation (EU) No 1071/2013 (ECB/2013/33), (referred to as the "BSI Regulation")³, where it is restricted to managing instruments underlying a securitisation or instruments that have otherwise been transferred in terms of the collection of principal and interest from the debtor. In other words, the term servicer in the sense of the BSI Regulation is subsumed in the AnaCredit definition.

The servicer should be identified for each instrument registered in the instrument dataset and the counterparty that acts as servicer registered in the counterparty-instrument dataset.

3.3 Examples

Example 1: Debtor with no immediate and ultimate parent company

The observed agent (OA), which is a foreign branch of the reporting agent (RA), extends an instrument to a counterparty (debtor D), which is the domestic part of a legal entity with no immediate or ultimate parent undertaking. The instrument is protected by a guarantee of a protection provider (PP), which is the domestic part of a legal entity.

The following counterparty reference data reports must be submitted in this case:

- Reporting agent (RA);
- Observed agent (OA) acting as creditor and servicer (one record but with two roles selected);

³ This is the regulation underpinning the Resident Offices Return (RS2)

- Debtor (D); and
- Protection Provider (PP).

Example 2: Debtor with an immediate and ultimate parent undertaking

The observed agent (OA) extends an instrument to a counterparty which is a foreign branch (debtor D). The OA is a foreign branch of the reporting agent (RA). The instrument is protected by a guarantee of protection provider (PP), which is the domestic part of a legal entity with no immediate parent undertaking. The debtor D has a head office undertaking, an immediate parent and an ultimate parent undertaking.

The following counterparty reference data reports must be submitted in this case:

- Reporting agent (RA);
- Observed agent (OA) acting as creditor and servicer (one record, but two roles selected);
- Debtor (D);
- Head office undertaking of the debtor D;
- Immediate parent undertaking (of the head office undertaking of the debtor D);
- Ultimate parent undertaking (of the head office undertaking of the debtor D); and
- Protection provider (PP).

Example 3: Debtor and protection provider with an immediate and ultimate parent undertaking

The observed agent (OA) extends an instrument to a counterparty which is a foreign branch (debtor D). The reporting agent of which the OA forms part is identified at the level of the institutional unit which forms its domestic part. Therefore, the counterparty identifiers of the reporting agent and the OA coincide. The instrument is protected by a guarantee of the protection provider (PP), which is a foreign branch. The head office undertaking of the PP only has one parent (i.e. the immediate parent is also the ultimate parent). The debtor D has a head office undertaking, an immediate parent undertaking and an ultimate parent undertaking.

The following counterparty reference data reports must be submitted in this case:

- Reporting agent = Observed agent (OA) acting as creditor and servicer (one record, but two roles selected);
- Debtor (D);
- Head office undertaking of the debtor D;
- Immediate parent undertaking (of the head office undertaking of the debtor D);
- Ultimate parent undertaking (of the head office undertaking of the debtor D); and
- Protection provider (PP).

Section 4: Counterparty Reference Data Attributes

The AnaCredit Regulation requires that a number of attributes are reported for each counterparty. The exact attributes to be reported are dependent on the roles that apply to the counterparty, and the legal residency of the counterparty. This chapter outlines the attributes required for each counterparty and provides detail on these attributes. Please refer to the appendix for a full list of counterparty reference data.

4.1 Counterparty role attributes

The counterparty roles must be reported for all counterparties. Any single counterparty can hold multiple roles. For each counterparty, a role should be reported if they hold the role in the attributes below.

When reporting multiple counterparty roles at a given reference date, the reporting agent must report all applicable roles for the counterparty. When updating counterparty roles for the given counterparty, the reporting agent must ensure all applicable roles are included on the record. Updating a counterparty role by including only the updated role on the record will cause the CBI system to overwrite previously submitted roles for the given counterparty. This will result in validation checks errors.

Where a counterparty holds the role of debtor for example, the reporting agent should report a value of "true" in the corresponding attribute. If the counterparty does not hold the role, the reporting agent should record a value of "false" in the corresponding attribute.

Please note that the XML schema will only accept the values "true" and "false" (in lower case letters) for the counterparty role attributes.

Further detail on the counterparty role profiles are available in Section 3.

The counterparty role attributes are:

Role: 1. Reporting agent
Role: 2. Observed agent
Role: 3. Creditor
Role: 4. Debtor – All instruments originated prior to 1 September 2018
Role: 5. Debtor – At least one instrument originated at or after 1 September 2018
Role: 6. Protection provider
Role: 7. Head office undertaking
Role: 8. Immediate parent undertaking
Role: 9. Ultimate parent undertaking
Role: 10. Originator
Role: 11. Servicer

4.2. Identifiers

4.2.1 Reporting agent identifier

Definition: Counterparty identifier for the reporting agent

The reporting agent identifier is to be reported for all counterparties.

This is an alphanumeric code assigned by the Central Bank. A list of all reporting agents together with the assigned reporting agent identifiers is available on the Central Bank's [AnaCredit webpage](#).

4.2.2 Counterparty identifier

The counterparty identifier is to be reported for all counterparties.

Definition: The counterparty identifier is an identifier applied by the reporting agent to uniquely identify each counterparty. Each counterparty must have a unique and exclusive counterparty identifier, meaning that such a value shall not change over time and cannot be used as the counterparty identifier for any other counterparty, even at a different point in time

In general, as long as the above characteristics are fulfilled, the counterparty identifier can be specific to the reporting agent. The counterparty identifier must satisfy the following principles:

- Principle of uniqueness:
RAs have to use these identifiers consistently across all data transmissions, and shall always use the same code for the same counterparty, even if a counterparty is reintroduced in the AnaCredit reporting after a period in which the counterparty was not subject to reporting.
- Principle of exclusivity:
In no case should a counterparty identifier which was used to identify a counterparty at any point in time be re-used to identify another counterparty e.g., including when a counterparty no longer falls under the AnaCredit reporting requirements, it is not active any longer or is to be deleted from the system for any reason.

4.2.3 Legal entity identifier (LEI)

Definition: A legal entity identifier of the counterparty assigned in accordance with the International Organisation for Standardisation's (ISO) 17442 standard.

A legal entity identifier (LEI) must be reported for each counterparty playing any role in the exposures to be reported for AnaCredit purposes, provided that such a code is available and that its status is valid. A valid LEI has a status of: issued, lapsed, merged, retired, transferred, pending validation, pending archival, or pending transfer.

A status of duplicate, annulled, or cancelled are not accepted for AnaCredit purposes.

Although LEIs are currently assigned only to legal entities, it is foreseen that a distinct LEI will be assigned in the near future to each foreign branch, if any, of legal entities.

If no LEI exists for a given counterparty, the attribute “Legal entity identifier (LEI)” is reported as “NA” (Non-applicable).

4.2.4 National identifiers

At least one national identifier must be reported for each counterparty playing any role in the instruments to be reported.

The AnaCredit Regulation defines a ‘national identifier’ as a commonly used identification code which enables the unambiguous identification of a counterparty or of the legal entity of which the counterparty forms part, within its country of residency. For a counterparty which is a foreign branch, the national identifier refers to the foreign branch. For a counterparty which is not a foreign branch, the national identifier refers to the legal entity.

4.2.4.1 Irish resident counterparties

For Irish resident counterparties, there is no single, unique identifier for all legal entities. For this reason, a number of commonly-used, national-level identifiers have been specified as individual attributes. Not all of these are mandatory or available for any single counterparty.

4.2.4.1.1 CRO identifier

The Irish Company Registration Office (CRO) is the statutory authority for registering new companies in the Republic of Ireland. Every company registered under the Companies Act 2014 becomes a body corporate and has a separate legal personality – it is a separate and distinct legal person. Each company, regardless of its type, is issued a CRO number, which allows for the unique identification of this legal entity at a national level.

More information, including a CRO number search facility, is available at <https://www.cro.ie>.

The CRO identifier must be reported for each Irish counterparty playing any role in the exposures to be reported for AnaCredit purposes, if such an identifier has been issued for that counterparty.

If a valid CRO identifier does not exist for a given counterparty (e.g. non-Irish entities or Irish legal entities that are not companies registered under the Companies Act), the value “NA” (Non-applicable) should be reported for this attribute.

4.2.4.1.2 RIAD identifier

The attribute “RIAD identifier” is requested for Irish counterparties only, and must be reported as “NA” (Non-applicable) for all non-Irish counterparties.

The RIAD application (“Register of Institutions and Affiliates Database”) operated by the ECB currently contains lists of the following five groups of institutions, based on information provided regularly by all members of the ESCB:

- Monetary financial institutions;
- Investment funds;
- Financial vehicle corporations;
- Payment statistics relevant institutions; and
- Insurance corporations.

Information is available to download at:

<https://www.ecb.europa.eu/stats/money/mfi/html/index.en.html>

This attribute should be reported where available. Where the RIAD identifier does not exist, a value of “NA” (Non-applicable) should be reported. Reporting agents may also use the value “NP” (Not reported) if the RIAD identifier may be available (as the counterparty is in one of the groups of institutions listed above) but has not been accessed by the reporting agent. A value of “NP” (Not reported) should only be used if an alternative national identifier has been provided.

4.2.4.1.3 *VAT identifier*

The attribute “VAT identifier” is requested for Irish counterparties only, and must be reported as “NA” (Non-applicable) for all non-Irish counterparties.

This attribute specifically refers to the Irish Value Added Tax number as issued by the Office of the Revenue Commissioners.

This attribute should be reported where available. Where the VAT number does not exist, a value of “NA” (Non-applicable) should be reported. Reporting agents may also use the value “NP” (Not reported) if a VAT number exists (because the counterparty is a VAT-registered entity) but has not been collected by the reporting agent. A value of “NP” (Not reported) should only be used if an alternative national identifier has been provided.

4.2.4.1.4 *Other Irish identifier*

The attribute “Other Irish identifier” is requested for Irish counterparties only, and must be reported as “NA” (Non-applicable) for all non-Irish counterparties.

This attribute can be used to report an identifier other than a CRO identifier, RIAD identifier or VAT identifier. If an alternative identifier is provided here, a short description of the identifier must be reported in the attribute “Identifier free text”.

Where CRO, RIAD or VAT identifiers do not exist for an Irish counterparty, any alternative national-level identifier may be reported by the reporting agent in the attribute “Other Irish identifier”.

This possibility, though, shall be interpreted as the last valid option, i.e. to be used in case none of the above options are available for that counterparty, but an alternative identifier is known by the reporting agent.

A register of Government Bodies is published on the Central Bank website and is revised biannually. This register provides identifiers that can be used in the attribute “Other Irish identifier” for entities listed. If Reporting Agents come across Government Bodies that are not on this register, they are requested to bring these to the attention of the Central Bank and seek guidance. The list of public sector bodies maintained on the website should take precedence over the CSO list of Public Sector Bodies.

Where an alternative Irish identifier does not exist for the counterparty (to the best of the reporting agent’s knowledge) a value of “NA” (Non-applicable) should be reported and an explanation should be given in the attribute “Identifier free text”.

4.2.4.2 Non-Irish resident counterparties

4.2.4.2.1 *Non-Irish identifier type and Non-Irish identifier*

For Irish resident counterparties, the value “NA” (Non-applicable) must be reported for the attributes “Non-Irish identifier type” and “Non-Irish identifier”. Note that for non-Irish counterparties the value “NA” (Non-applicable) cannot be reported for these attributes.

For each non-Irish counterparty, a national identifier from the “list of national identifiers” for the relevant country must be reported, together with the indication of the respective identifier type, unless a valid LEI is reported. This is necessary to allow the proper matching of counterparties across all different reporting agents belonging to the AnaCredit reporting population. Where a valid LEI is reported, then the value “NR” (Not required) may be reported for the attributes “Non-Irish identifier type” and “Non-Irish identifier”.

The list of national identifiers for each country is available on the [ECB AnaCredit webpage](#) and the domain list of codes to be used for the attribute “Non-Irish identifier type” is provided in the “Counterparty Template and Rules” file. When more than one identifier type is included in the list for the relevant country of residency of the counterparty, the first available identifier from the ranked list is reported. Note that this list is likely to be subject to changes in the future.

Once an identifier type from the country list has been identified by the reporting agent and reported for the attribute “Non-Irish identifier type”, the corresponding code is reported – ***in the format indicated***, if specified – in the attribute “Non-Irish identifier”.

The list of national identifiers can be broken down as follows:

- **country-specific identifiers:** these identifier types are prefixed with the relevant ISO-3166 country code. The identifiers have a specific national name and (in several cases) a pre-defined format, i.e. in terms of length of the code, letters/digits composition, presence of special characters, etc. The reporting format is specified in the published [List of National Identifiers](#) (column I – “Reporting format: RegEx specification”) available on the ECB website.
- **non-EU identifiers:** Detailed guidance on where to retrieve valid national identifiers is published on the [ECB website](#).

- **generic identifiers:** these identifiers are prefixed with “GEN_” (see ‘List of generic identifiers’ below). For non-EU counterparties, a generic (“GEN”) identifier can be reported but preference should be given to one of the identifiers included in the list of national identifiers reference above, where applicable.

List of generic identifiers	
Identifier type	Identifier name
GEN_VAT_CD	VAT number
GEN_TAX_CD	Tax code
GEN_NBR_ENTTY_CD	Business register number
GEN_TRD_RGSTR_ENTTY_CD	Trade register number
GEN_NSI_ENTTY_CD	National Statistical Institute number
GEN_NCB_ENTTY_CD	National Central Bank identifier
GEN_NSA_ENTTY_CD	National supervisory authority code
GEN_PS_CD	Public sector entity identifier
GEN_IPF_CD	Investment/Pension fund identifier
GEN_OTHER_CD	Other (please specify)
GEN_NOTAP_CD	Not Applicable

Where a generic identifier type is reported in the attribute “Non-Irish identifier type”, then a corresponding identifier (in the correct reporting format) must be reported in the attribute “Non-Irish identifier”.

- **special cases:** please see the ‘List of special cases’ below:

List of special cases		
Identifier type	Applicable to counterparties resident in	Identifier name
CY_OTHER_CD	Cyprus	Other identifier, to be described
DK_NOTAP_CD	Denmark	Not applicable
FI_NOTAP_CD	Finland	Not applicable
DE_NOTAP_CD	Germany	Not applicable
AT_NOTAP_CD	Austria	Not applicable
LU_NOTAP_CD	Luxembourg	Not applicable
SE_NOTAP_CD	Sweden	Not applicable

The identifier “CY_OTHER_CD” only applies to counterparties resident in CY.

For counterparties resident in AT, DE, DK, FI, LU and SE, a country specific ‘Non-applicable’ option is available. This must be reported using the appropriate special case value from the

list. Such an option was included in the AnaCredit list of national identifiers to account for the fact that some entities in given countries do not have any national identifier, e.g. due to the particular sector to which they belong. In such cases, **where one of these special case 'Non-applicable' values is reported for the attribute "Non-Irish identifier type", then the value "NOTAP" (Non-applicable) should be reported in the corresponding attribute "Non-Irish identifier"**. Note that in these cases the value "NA" cannot be reported for the attribute "Non-Irish identifier" because "NA" is restricted for Irish counterparties only.

Note that for the generic option "GEN_OTHER_CD" (Other (please specify)) and the special case option "CY_OTHER_CD" (Other identifier, to be described), an identification code not included in the list can be reported for that counterparty, as long as such a code allows the unambiguous identification of the counterparty in its country of residency (i.e. the code is publicly available and exclusive to the counterparty). This option, however, is used only in cases where no other pre-determined national identifier from the list is available for that counterparty. **Moreover, when either the option "GEN_OTHER_CD" or "CY_OTHER_CD" is reported for the data attribute "Non-Irish identifier type", a short (free text) description of the type of code being reported (e.g. "company identification number in the public registry") must also be reported in the attribute "Identifier free text"**.

The “Non-Irish identifier type” and “Non-Irish identifier” must be consistent with each other. Please see consistency summary table below:[Non-Irish identifier type]	[Non-Irish identifier]	Scenario
NA	NA	Where the counterparty is Irish, the value “NA” must be reported for the [Non-Irish identifier type] and [Non-Irish identifier].
NR	NR	Where a valid LEI has been reported, the value “NR” may be reported for [Non-Irish identifier type] and [Non-Irish identifier]. An identifier type and corresponding identifier may also be reported, if available.
AT_NOTAP_CD, DK_NOTAP_CD, DE_NOTAP_CD, FI_NOTAP_CD, LU_NOTAP_CD, SE_NOTAP_CD	NOTAP	Where a country specific ‘Non-applicable’ identifier type has been reported.
An identifier type from the domain list (other than the ‘Non-applicable’ options)	A corresponding identifier value reported in the correct format. The values “NA”, “NR” or “NOTAP” are not allowed in this case.	Where a country-specific identifier type from the list is reported – a corresponding identifier must be reported.

4.2.5 Identifier free text

The attribute [Identifier free text] is always **Required**, regardless of the residency of the counterparty and the roles that apply. For the most part, provided that sufficient identifier information has been provided, the value “NA” (Non-applicable) may be reported for this attribute. However, a short (free text) description must be reported for this attribute in the following three scenarios:

- **Where the counterparty is Irish:**

1. If the attribute “Other Irish identifier” is populated with an alternative identifier, i.e. a value other than “NA” (Non-applicable) is reported. In this case, the reporting agent has sourced a national-level identifier for an Irish counterparty other than the CRO, RIAD or VAT identifiers. A brief description of this alternative identifier must be reported in the attribute “Identifier free text”.
 2. If the attributes “Legal entity identifier (LEI)”, “CRO identifier”, “RIAD identifier”, “VAT identifier” and “Other Irish identifier” are all reported with a value of “NA” (Non-applicable). In this case, the reporting agent is declaring that no national identifier exists for this counterparty, and a brief explanation as to why no identifier is available must be provided in the “Identifier free text” attribute (e.g. the counterparty is a government entity).
- **Where the counterparty is not Irish:**
3. If the attribute “Non-Irish identifier type” is reported with either the generic option “GEN_OTHER_CD” (Other (please specify)) or the special case option “BG_OTHER_CD” (Other identifier, to be described). In this case, an identification code not included in the list of national identifiers can be reported for that counterparty, as long as such a code allows the unambiguous identification of the counterparty in its country of residency (i.e. the code is publicly available and exclusive to the counterparty). A short (free text) description of the type of code being reported (e.g. “company identification number in the public registry”) must be reported in the attribute “Identifier free text”.

4.2.6 Head office undertaking identifier

Definition: The head office undertaking identifier is the counterparty identifier of the domestic part of the legal entity of which the institutional unit is a legally dependent part.

The head office undertaking identifier must be reported for debtors resident in a Reporting Member State to which at least one instrument has been originated at or after 1 September 2018.

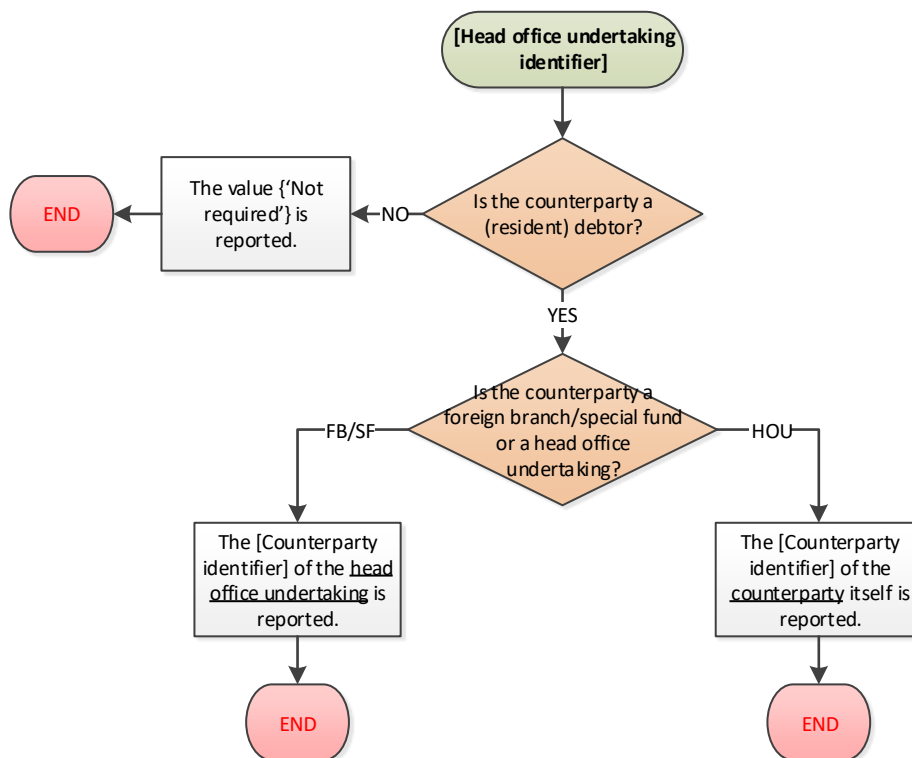
For counterparties which are foreign branches, the head office identifier enables a link to be established between the foreign branch and the respective legal entity, as represented by the head office undertaking. For counterparties which are a legal entity, the head office undertaking identifier coincides with the counterparty identifier (as the legal entity is represented by the head office undertaking) and signals that the counterparty in question is a legal entity.

If the counterparty is a legal entity (represented by the head office undertaking), it is recommended that the head office undertaking identifier is reported with the same value as the counterparty identifier itself. Therefore, whenever the counterparty identifier and the head office undertaking identifier in a given data record coincide, the record refers to the legal entity, not to a foreign branch. By contrast, whenever the counterparty identifier and the head office undertaking identifier are distinct codes, the counterparty reference data record is understood to refer to a foreign branch (or special fund).

A value of “NR” (Not required) may be reported if the counterparty is not resident in a Reporting Member State or if the role debtor (with at least one instrument originated at or after 1 September 2018) does not apply.

Note that a value of “NP” (Not reported) may technically be provided.

The following flowchart outlines the logic to apply when reporting the attribute “Head office undertaking identifier” (please refer to Appendix III for further details):



4.2.7 Immediate parent undertaking identifier

Definition: The immediate parent undertaking identifier is the counterparty identifier for the domestic part of the legal entity which is the immediate parent undertaking of the counterparty. If the counterparty has no parent undertaking and is a domestic part of a legal entity, the counterparty identifier for the counterparty itself is to be reported. Parent undertaking has the same meaning as defined in Article 4(1)(15)(a) of the CRR.

The immediate parent undertaking identifier must be reported for debtors resident in a Reporting Member State to which at least one instrument has been originated at or after 1 September 2018.

Note that natural persons do not qualify as parent undertakings according to the CRR. In addition, according to the CRR and Directive 83/349/EEC, an immediate parent undertaking can generally exist only for enterprises. Therefore, no “immediate parent undertaking” is normally reported for counterparties belonging to the local, central and general government sectors. In such cases, a value of “NA” (Non-applicable) may be reported.

According to Article 4(1)(15)(a) of the CRR “parent undertaking” means “a parent undertaking within the meaning of Articles 1 and 2 of Directive 83/349/EEC”.

As the concept of immediate parent undertaking relates only to legal entities, no information on the immediate parent undertaking is recorded in the counterparty reference data of a foreign branch (or special fund).

If a debtor does not have an immediate parent undertaking, the counterparty identifier of the legal entity to which the debtor belongs is reported as the immediate parent undertaking identifier (in the data record of the head office undertaking, if the debtor is a foreign branch).

If a counterparty has more than one immediate parent undertaking, the entity with the most significant influence over the debtor (normally, but not necessarily, the one with the highest share of ownership) is reported as the immediate parent undertaking. If two or more undertakings have the same influence over a debtor, only one of them, at the discretion of the reporting agent, is reported as the immediate parent undertaking.

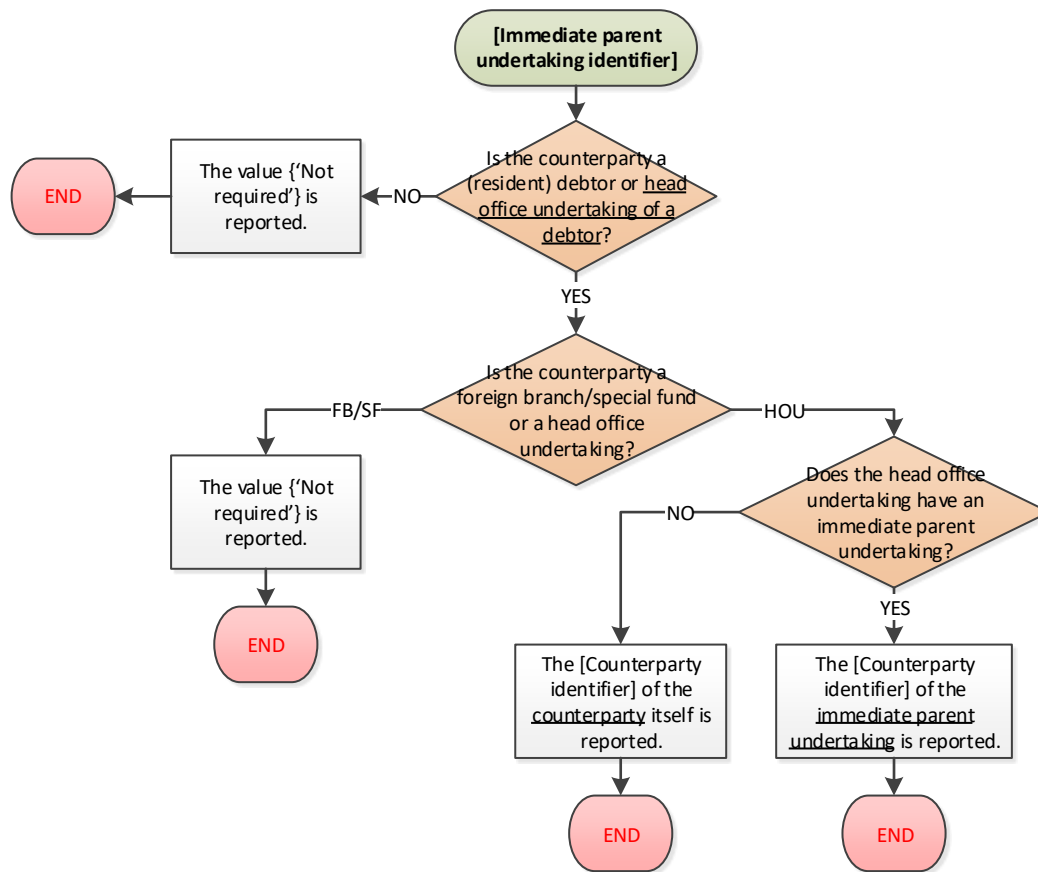
Note that the immediate parent undertaking identifier and the respective counterparty reference data are reported irrespective of whether there is a business relationship between the observed agent and the immediate parent undertaking.

A value of "NR" (Not required) may be reported if the counterparty is not resident in a Reporting Member State or if the role debtor (with at least one instrument originated at or after 1 September 2018) does not apply.

- If the counterparty is a resident debtor, which is itself the head office undertaking, then the counterparty identifier of the immediate parent undertaking of the head office undertaking (the debtor itself in this case) is reported in the attribute "Immediate parent undertaking identifier".
- If the counterparty is a resident debtor, which is a foreign branch or special fund, then the value "NR" (Not required) should be reported in the attribute "Immediate parent undertaking identifier". In this case, a separate counterparty record must be reported for the head office undertaking of the debtor. In the counterparty record of the head office undertaking (of the debtor), the counterparty identifier of the immediate parent undertaking of the head office undertaking (of the debtor) is reported in the attribute "Immediate parent undertaking identifier".

Note that a value of "NP" (Not reported) may technically be provided.

The following flowchart outlines the logic to apply when reporting the attribute "Immediate parent undertaking identifier" (please refer to Appendix III for further details):



4.2.8 Ultimate parent undertaking identifier

Definition: Counterparty identifier for the legal entity which is the ultimate parent undertaking of the counterparty. This ultimate parent undertaking has no parent undertaking. If the counterparty has no parent undertaking, the counterparty identifier for the counterparty itself is to be reported. Parent undertaking has the same meaning as defined in Article 4(1)(15)(a) of Regulation (EU) No 575/2013.

The ultimate parent undertaking identifier must be reported for debtors resident in a Reporting Member State to which at least one instrument has been originated at or after 1 September 2018.

Note that natural persons do not qualify as parent undertakings according to the CRR. In addition, according to the CRR and Directive 83/349/EEC, an ultimate parent undertaking can generally exist only for enterprises. Therefore, no “ultimate parent undertaking” is normally reported for counterparties belonging to the local, central and general government sectors. In such cases, a value of “NA” (Non-applicable) may be reported.

According to Article 4(1)(15)(a) of the CRR “parent undertaking” means “a parent undertaking within the meaning of Articles 1 and 2 of Directive 83/349/EEC”.

As the concept of ultimate parent undertaking relates only to legal entities, no information on the ultimate parent undertaking is recorded in the counterparty reference data of a foreign branch (or special fund).

If a debtor does not have an ultimate parent undertaking, the counterparty identifier of the legal entity to which the debtor belongs is reported as the ultimate parent undertaking identifier (in the data record of the head office undertaking, if the debtor is a foreign branch).

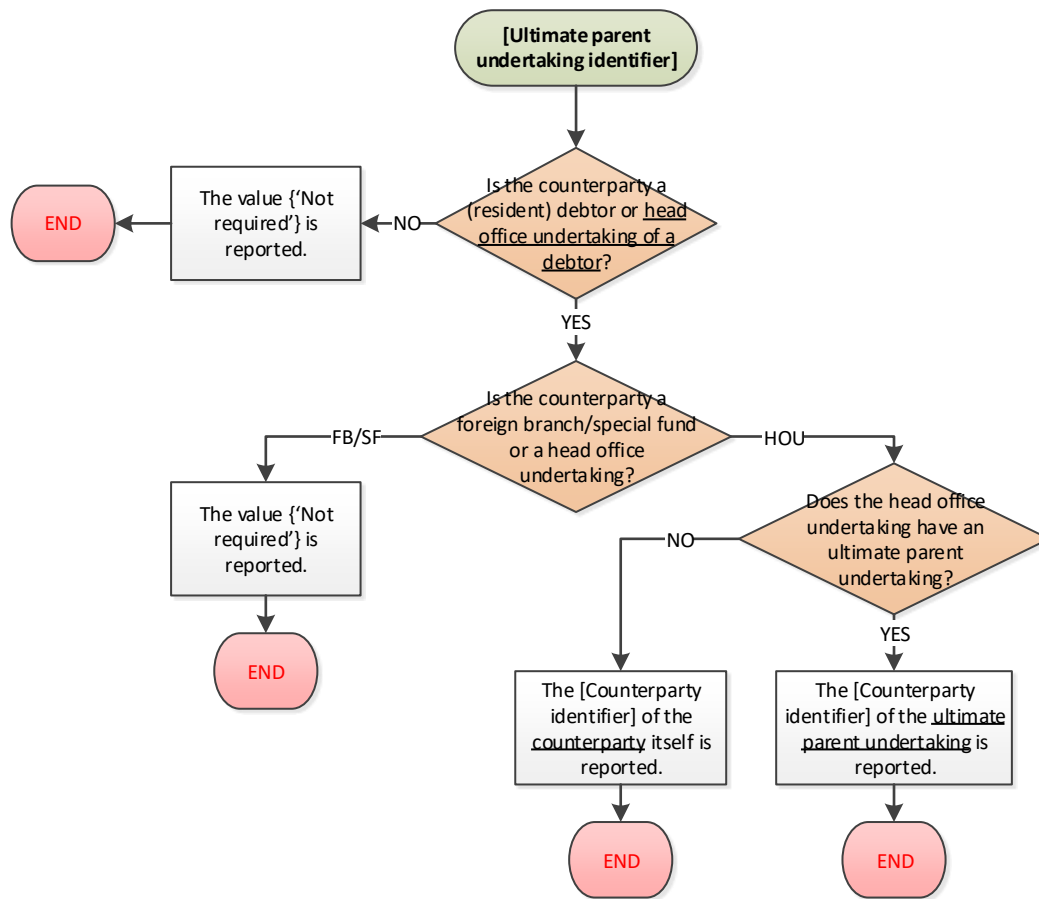
Note that the ultimate parent undertaking identifier and the respective counterparty reference data report are reported irrespective of whether there is a business relationship between the observed agent and the ultimate parent undertaking.

A value of “Not required” (NR) may be reported if the counterparty is not resident in a Reporting Member State or if the role debtor (with at least one instrument originated at or after 1 September 2018) does not apply.

- If the counterparty is a resident debtor, which is itself the head office undertaking, then the counterparty identifier of the ultimate parent undertaking of the debtor (which is the head office undertaking) is reported in the attribute “Ultimate parent undertaking identifier”.
- If the counterparty is a resident debtor, which is a foreign branch or special fund, then the value “NR” (Not required) should be reported in the attribute “Ultimate parent undertaking identifier”. In this case, a separate counterparty record must be reported for the head office undertaking of the debtor. In the counterparty record of the head office undertaking (of the debtor), the counterparty identifier of the ultimate parent undertaking of the head office undertaking (of the debtor) is reported in the attribute “Ultimate parent undertaking identifier”.

Note that a value of “NP” (Not reported) may technically be provided.

The following flowchart outlines the logic to apply when reporting the attribute “Ultimate parent undertaking identifier” (please refer to Appendix III for further details):



4.3. Counterparty information

4.3.1 Name

Definition: The full legal name of the counterparty.

The name must be reported for all counterparties.

The name must be reported in accordance with the information reported in the CRO Register. If the counterparty is not registered with the CRO, then the name must be reported in accordance with the LEI Register, VAT Register or RIAD Register or other non-Irish Register (if relevant).

For the domestic part of a legal entity, it is the name of the legal entity itself, as registered upon the incorporation of the legal entity that must be reported.

Generally, foreign branches have the same name as the legal entity (plus often an addendum in the local language) while the name of special funds differs from that of their investment company.

For counterparties which are not registered and can therefore have multiple, equally valid names (e.g. public sector entities, associations), the name should preferably be reported in the language of the country where the counterparty is resident.

4.3.2 Address fields general guidance

In general, the address must be reported for all counterparties, irrespective of the country of residency, except counterparties whose only role is that of a servicer. The attributes “Address: country” and “Address: county / administrative division” are exceptions, please see individual sections below for details.

The address is also reported for foreign branches, but it is generally not applicable to special funds.

The address shall be reported in line with the residency of the institutional unit according to Article 1(4) of Regulation (EC) No 2533/98. Address provided for counterparties is the country of the place (the city, town or village) where the counterparty is registered, e.g. in the business register.

The address of a foreign branch differs from that of the legal entity to which it belongs (represented by the head office undertaking). Moreover, if more than one branch office of the same legal entity is established in a given country, they are deemed to constitute a single institutional unit (i.e. the foreign branch) for AnaCredit reporting purposes. Therefore, which address details to be reported in the case of a single foreign branch per country is at the discretion of the reporting agent.

4.3.3 Address: street

Definition: The counterparty's street address, including the street number

It is the name of the street and the civic number (including the sub-section – e.g. “54”; “1A”; “Unit 2B”; “Floor 3 75”) of the street where the counterparty is registered. The civic number **must not** include a comma (‘,’). The civic number and the street should be separated by a comma (‘,’) and should be reported in the order: street name, civic number (e.g. “Main St, 12A”; “New Wapping Street, Floor 5”; “Gotham Road, Block F 63”).

The value “NR” (Not required) may be reported if the only role that applies to the counterparty is that of servicer.

The value “NA” (Non-applicable) may be reported if the counterparty is a special fund.

Note that a value of “NP” (Not reported) may technically be provided.

4.3.4 Address: city / town / village

Definition: The counterparty's city, town or village.

This is the name of the place (i.e. the city, town or village) at which the counterparty is registered, e.g. in the business register, if applicable.

The value “NR” (Not required) may be reported if the only role that applies to the counterparty is that of servicer.

The value “NA” (Non-applicable) may be reported if the counterparty is a special fund.

Note that a value of “NP” (Not reported) may technically be provided.

4.3.5 Address: Irish county

This is the name of the county (in the Republic of Ireland) in which the counterparty is registered. Please refer to the specific domain list for “Address: Irish county”.

The value “NR” (Not required) may be reported if the only role that applies to the counterparty is that of servicer.

The value “NA” (Non-applicable) may be reported if the counterparty is a special fund, or if the counterparty is not resident in the Republic of Ireland.

Note that a value of “NP” (Not reported) may technically be provided.

4.3.6 Address: postal code

Definition: The counterparty's postal code.

This is the postal code of the place (the area in the city, town or the village) where the counterparty is registered, e.g. in the business register, if applicable.

For Irish counterparties, an Eircode or a Dublin post code should be reported.

The value “NR” (Not required) may be reported if the only role that applies to the counterparty is that of servicer.

The value “NA” (Non-applicable) may be reported if the counterparty is a special fund or if no postal code exists for a given address.

This attribute should be reported where available. If the postal code exists but it is unavailable to the reporting agent, then the value “NP” (Not reported) may be reported.

4.3.7 Address: county / administrative division

Definition: The county or similar administrative division of counterparties resident in European Union Member States.

This is the county/administrative division (NUTS 3 classification) of the place (the city, town or village) where the counterparty is registered, in the business register, if applicable. Please refer to the domain list for this attribute.

For counterparties resident in the European Union, the Nomenclature of Units for Territorial Statistics (NUTS) generally applies. This is a hierarchical geocode standard for referencing the subdivisions of countries for statistical purposes, developed and regulated by the European Union.

For each EU Member State, a hierarchy of three NUTS levels is established by Eurostat. The subdivisions in some levels do not necessarily correspond to administrative divisions within the country. Note that the requirement for this attribute is to report the **NUTS level 3 regions**⁴.

The NUTS 2013 classification for EU member countries can be accessed via the following link:

http://ec.europa.eu/eurostat/ramon/nomenclatures/index.cfm?TargetUrl=LST_CLS_DLD&StrNom=NUTS_2013L&StrLanguageCode=EN&StrLayoutCode=HIERARCHIC

A value of “NR” (Not required) may be reported if the counterparty is not resident in a Reporting Member State or if the only role that applies to the counterparty is that of servicer. The value “NR” (Not required) may also be used in the following scenarios:

1. The counterparty is an Irish resident and the attribute “Address: Irish county” has been provided.
2. The counterparty is a non-Irish resident and the attribute “Address: postal code” has been provided.

In both cases, the Central Bank will use this other information to derive the NUTS 3 region.

The value “NA” (Non-applicable) may be reported if the counterparty is a special fund.

A value of “NP” (Not reported) may technically be provided.

4.3.8 Address: country

Definition: The counterparty’s country.

This is the country of the place (the city, town or village) where the counterparty is registered, e.g. in the business register, if applicable.

The value to be reported is the ISO 3166-1 alpha-2 code of the country. Domain values are included in the accompanying domain lists.

This attribute must be provided for all counterparties, i.e. it is not possible to report ‘Non-applicable’, ‘Not required’ or ‘Not reported’. Note however that the values “NA”, “NR” and “NP” are acceptable but only where the country of residence is Namibia, Nauru and Nepal, respectively.

⁴ Note that changes are expected to this classification in mid 2021.

4.3.9 Date of address

Reporting agents should report the date at which the address was captured or when any address field was last updated. If this date is not available, the current reference date of the return should be used.

The value “9999-01-01” (Not required) may be reported if the only role that applies to the counterparty is that of servicer.

The value “8888-01-01” (Non-applicable) may be reported if the counterparty is a special fund.

Note that a value of “7777-01-01” (Not reported) may technically be provided.

4.3.10 Legal form

Definition: The type of business entity as defined in the national legal system.

The legal form must be reported for all counterparties, irrespective of the country of residency, except counterparties whose only role is that of a servicer.

This data attribute is applicable only at the legal entity level. This implies that for a counterparty which is a foreign branch, the “Legal form” is only reported in the counterparty reference data of the head office undertaking which represents the legal entity, while it is reported as “NA” (Not applicable) in the record of the counterparty (foreign branch) itself.

Although special funds are treated similarly to foreign branches for AnaCredit reporting purposes, a value for the attribute “Legal form” is also reported in the counterparty reference data record of a counterparty which is a special fund. In this case, the value “SPFUND” is reported, unless a legal form from the relevant country list is deemed more appropriate in that specific case.

The type of business entity as defined in the national legal system is reported in this data attribute. Depending on the country of residency of (the head office undertaking of) the counterparty, the list of admissible options is presented in the “list of legal forms”. Please refer to the domain list for this attribute (the list of legal forms can also be found on the [ECB's website](#)).

In addition to the country-specific legal forms, legal entities resident in any country of the European Union can also have one of the following European legal forms, i.e.:

- “EU100” European Company (SE);
- “EU200” European Cooperative Society (SCE);
- “EU300” European Economic Interest Grouping (EEIG);
- “EU400” European Grouping of Territorial Cooperation (EGTC).

For legal entities resident outside the European Union, one of the following options is reported (i.e. the one that best represents the country-specific legal form of that particular counterparty):

- “RW100” Corporation;

- “RW200” Cooperative;
- “RW300” Partnership;
- “RW400” Sole trader;
- “RW500” Limited liability company;
- “RW600” Other.

For Irish resident counterparties, the following legal forms have been included in the domain list:

- “IE01” Private Company Limited by Shares (LTD company)
- “IE02” Designated Activity Company (DAC) – limited by shares
- “IE03” Designated Activity Company (DAC) – limited by guarantee
- “IE04” Company Limited by Guarantee (CLG)
- “IE05” Public Limited Company (PLC)
- “IE06” Single Member Company
- “IE07” Unlimited Company
- “IE08” Undertakings for Collective Investment in Transferable Securities (UCITS)

Please note that for the above domain values (IE01 to IE08), definitions of each are available at <https://www.cro.ie/Registration/Company>.

- “IE11” Industrial and Provident Society
- “IE12” Friendly Society
- “IE13” Trade Union.

Please note that for the above domain values (IE11 to IE13), definitions of each area available at <https://www.cro.ie/Registration/Society-Union>.

- “IE14” Local authority – County council, city council, city and county council.
- “IE15” Statutory corporation – A body corporate, created under a particular statute or Act of the Oireachtas. Examples of statutory corporations include ESB, CIE and the Central Bank of Ireland.
- “IE16” Other legal form – Any other legal form not covered by the above values.

Entities listed on the register of Government bodies published on the Central Banks website need to be reviewed by Reporting Agents to establish if they are indeed a statutory corporation or not before submitting the entity as IE15. Not all entities listed on the register are IE15 and it is the responsibility of the Reporting Agent to ascertain this before submitting the record.

The value “NR” (Not required) may be reported if the only role that applies to the counterparty is that of servicer.

Note that a value of “NP” (Not reported) may technically be provided.

4.3.11 Institutional sector

Definition: Institutional sectors in accordance with Regulation (EU) No 549/2013, Regulation (EU) No 575/2013 and Regulation (EU) No 1075/2013 of the European Central Bank (ECB/2013/40).

The institutional sector must be reported for all counterparties, irrespective of the country of residency. This data attribute is also reported for foreign branches and special funds.

The institutional sector refers exclusively to the institutional unit. Therefore, in the case of a legal entity which has foreign branches, a distinct value for the “Institutional sector” is potentially reported in the reference data record of the head office undertaking (representing the legal entity) and in the reference data records of the foreign branches.

The following table lists the applicable institutional sectors:

Table 7: Institutional Sectors

Institutional sector	Definition
Non-financial corporations	Non-financial corporations as defined in paragraphs 2.45 to 2.50 of Annex A to Regulation (EU) No 549/2013.
Central Bank	Central banks as defined in paragraphs 2.72 to 2.74 of Annex A to Regulation (EU) No 549/2013.
Credit institutions	Credit institutions as defined in Article 4(1)(1) of Regulation (EU) No 575/2013.
Deposit-taking corporations other than credit institutions	Deposit-taking corporations other than credit institutions as defined in Article 1(a)(2)(a)(ii) of Regulation (EU) No 1071/2013 (ECB/2013/33).
Money market funds (MMF)	Money market funds (MMF) as defined in Article 2 of Regulation (EU) No 1071/2013 (ECB/2013/33).
Non-MMF investment funds	Non-MMF investment funds as defined in paragraphs 2.82 to 2.85 of Annex A to Regulation (EU) No 549/2013.
Financial vehicle corporations (FVCs) engaged in securitisation transactions	FVCs engaged in securitisation transactions, as defined in Article 1(1) and (2) of Regulation (EU) No 1075/2013 (ECB/2013/40).

Other financial intermediaries, except financial auxiliaries, captive financial institutions and money lenders, insurance corporations, pension funds and financial vehicle corporations engaged in securitisation transactions	Other financial intermediaries, except insurance corporations and pension funds, as defined in paragraph 2.86 of Annex A to Regulation (EU) No 549/2013 and excluding FVCs engaged in securitisation transactions, as defined in Article 1(1) and (2) of Regulation (EU) No 1075/2013 (ECB/2013/40).
Financial auxiliaries	Financial auxiliaries as defined in paragraph 2.63 of Annex A to Regulation (EU) No 549/2013.
Captive financial institutions and money lenders	Captive financial institutions and money lenders as defined in paragraphs 2.98 to 2.99 of Annex A to Regulation (EU) No 549/2013.
Insurance corporations	Insurance corporations as defined in paragraphs 2.100 to 2.104 of Annex A to Regulation (EU) No 549/2013.
Pension funds	Pension funds as defined in paragraphs 2.105 to 2.110 of Annex A to Regulation (EU) No 549/2013.
Central government	Central government as defined in paragraph 2.114 of Annex A to Regulation (EU) No 549/2013.
State government	State government as defined in paragraph 2.115 of Annex A to Regulation (EU) No 549/2013.
Local government	Local government as defined in paragraph 2.116 of Annex A to Regulation (EU) No 549/2013.
Social security funds	Social security funds as defined in paragraph 2.117 of Annex A to Regulation (EU) No 549/2013.
Non-profit institutions serving households	Non-profit institutions serving households, as defined in paragraphs 2.129 to 2.130 of Annex A to Regulation (EU) No 549/2013.

The institutional sector always refers to the institutional unit, not to the legal entity of which it forms part. Hence, it is also reported for foreign branches and special funds. Usually, although not always, the head office undertaking and the foreign branches of a single legal entity have the same institutional sector.

For a reporting agent, the institutional sector of the legal entity (represented by the head office undertaking) and of its foreign branches is always “Credit institutions”.

Special funds belong either to the institutional sector “Money market funds (MMF)” (ESA 1230) or “Non-MMF investment funds” (ESA 1240).

4.3.12 Economic activity

Definition: The economic activity is a classification of counterparties according to their economic activities, in accordance with the NACE revision 2 statistical classification as

laid down in Regulation (EC) No 1893/2006 of the European Parliament and of the Council.

The economic activity must be reported for all creditors, debtors, head office undertakings and immediate parent undertakings resident in a Reporting Member State. The economic activity must also be reported for all debtors not resident in a Reporting Member State.

This data attribute is a statistical classification of the economic activity of the counterparty as established in accordance with Regulation (EC) No 1893/2006 of the European Parliament and of the Council of 20 December 2006 establishing the statistical classification of economic activities, NACE Revision 2 and amending Council Regulation (EEC) No 3037/90 as well as certain EC Regulations on specific statistical domains (OJ L 393, 30.12.2006, p. 1).

The economic activity value to be reported is a level two, three or four NACE code in accordance with Regulation (EC) No 1893/2006. Please refer to the domain list for this attribute.

NACE Rev 2 is a hierarchical structure:

- a first level consisting of headings identified by an alphabetical code (sections), e.g. C – “*Manufacturing*”;
- a second level consisting of headings identified by a two-digit numerical code (divisions), e.g. 10 – “*Manufacture of food products*”;
- a third level consisting of headings identified by a three-digit numerical code (groups), e.g. 10_1 – “*Processing and preserving of meat and production of meat products*”;
- a fourth level consisting of headings identified by a four-digit numerical code (classes), e.g. 10_11 – “*Processing and preserving of meat*”.

The level four NACE code in accordance with Regulation (EC) No 1893/2006 is generally reported. If the level four NACE code is not available to the reporting agent, the NCB may allow the reporting of a level three or level two NACE code.

The economic activity always refers to the institutional unit, not to the legal entity of which it forms part. Hence, it is also reported for foreign branches and special funds. In addition, the economic activity of a foreign branch can be different from that of its head office undertaking.

If a counterparty is engaged in several activities, the principal activity is taken into account when determining the economic activity to be reported.

Note that a value of “NR” (Not required) may be reported in the following scenarios:

- The counterparty is resident in a Reporting Member State and its role is anything other than creditor, debtor, head office undertaking, or immediate parent undertaking;
- The counterparty is not resident in a Reporting Member State and its role is anything other than debtor.

Note that a value of “NP” (Not reported) may technically be provided.

4.3.13 Status of legal proceedings

Definition: The status of legal proceedings covers the categories describing a counterparty's legal status in relation to its solvency based on the national legal framework.

The status of legal proceedings must be reported for all debtors resident in a Reporting Member State.

Please refer to the specific domain list for this attribute. The possible values are:

- *No legal actions taken* – must be reported if no legal actions have been taken concerning the solvency or indebtedness of a counterparty;
- *Under judicial administration, receivership or similar measures* – must be reported if any proceeding have been taken involving the intervention of a judicial body or similar aimed at reaching a refinancing agreement among the creditors, with the exception of any bankruptcy or insolvency proceedings;
- *Bankruptcy* – should be reported if collective and binding bankruptcy proceedings have taken place.
- *Insolvency* – must be reported if collective and binding insolvency proceedings under judicial control have taken place, which entail the appointment of a liquidator;
- *Other legal measures* – must be reported if legal measures other than those already specified have been applied in the relation to the counterparty.

This data attribute is intended to contain, to the extent possible, “objective” information, i.e. information that represents the actual situation of the counterparty at a given point in time and is independent of the specific observed agent reporting it.

A value other than “No legal actions taken” is thus not only to be reported if the respective observed agent has taken some sort of legal action, but also when the reporting agent is aware that some sort of legal action has been taken against the counterparty by a third party (e.g. by a distinct reporting agent).

Moreover, as the attribute relates directly to the legal entity, it is only applicable to a head office undertaking which represents the legal entity. Consequently, in the case of foreign branches and special funds, the value “NA” (Non-applicable) must be reported.

A value of “NR” (Not required) may be reported if the counterparty role is anything other than debtor, or if the counterparty is not resident in area Reporting Member State.

Note that a value of “NP” (Not reported) may technically be provided.

4.3.14 Date of initiation of legal proceedings

Definition: The date on which the legal proceedings, as reported under the attribute ‘Status of legal proceedings’, were initiated. This date should be the most recent relevant date prior to the reporting date.

The attribute “Date of initiation of legal proceeding” has to be reported whenever a change is reported for the data attribute “Status of legal proceedings” of a given counterparty.

This data attribute captures the date when the information reported in the data attribute “Status of legal proceedings” is considered to have been initiated, irrespective of whether the legal proceedings were initiated by the reporting agent or by a third party.

If the value for a counterparty of the data attribute “Status of legal proceedings” has been “No legal actions taken” from the inception date, then “8888-01-01” (Non-applicable) is reported in the data attribute “Date of initiation of legal proceedings”.

If the status has a value other than “No legal actions taken”, the date that is reported is the date on which the status is considered to have arisen.

If the status changes from any other status to “No legal actions taken” (e.g. because the counterparty has recovered following a period where it was under judicial administration), the date of such a change is reported in the data attribute “Date of initiation of legal proceedings”. If the latter date is before the first reporting reference date, “8888-01-01” (Non-applicable) is reported in this data attribute.

If the value “NA” (Non-applicable) is reported for the data attribute “Status of legal proceedings”, the value “8888-01-01” (Non-applicable) must be reported in the data attribute “Date of initiation of legal proceedings”.

A value of “9999-01-01” (Not required) may be reported if the counterparty role is anything other than debtor, or if the counterparty is not resident in the euro area.

Note that a value of “7777-01-01” (Not reported) may technically be provided.

4.3.15 Enterprise size

Definition: The classification of enterprises by size, in accordance with the Annex to Commission Recommendation 2003/361/EC.

The enterprise size must be reported for all debtors in a Reporting Member State.

This data attribute classifies counterparties which are enterprises by the following sizes:

- ‘Large enterprise’ must be reported if the counterparty is an enterprise not qualifying as a micro, small or medium-sized enterprise (SME), in accordance with the Annex to Recommendation 2003/361/EC;

- ‘Medium enterprise’ must be reported if the counterparty is an enterprise qualifying as an SME, but not as a small enterprise or as a microenterprise, in accordance with the Annex to Recommendation 2003/361/EC;
- ‘Small enterprise’ must be reported if the counterparty is an enterprise qualifying as a small enterprise, in accordance with the Annex to Recommendation 2003/361/EC;
- ‘Microenterprise’ must be reported if the counterparty is an enterprise qualifying as a microenterprise in accordance with the Annex to Recommendation 2003/361/EC.

This data attribute is only applicable to enterprises, as defined in Article 1 of the Annex to Commission Recommendation 2003/361/EC: *“an enterprise is considered to be any entity engaged in an economic activity, irrespective of its legal form. This includes, in particular, self-employed persons and family businesses engaged in craft or other activities, and partnerships or associations”*.

This means that this attribute is generally not applicable for counterparties not engaged in economic activity, such as general government units. In such cases, the value “NA” (Non-applicable) must be reported in the data attribute “Enterprise size”.

In accordance with Commission Recommendation 2003/361/EC, the concept of enterprise size applies at the legal entity level. Therefore, in case of a counterparty which is a foreign branch, the enterprise size is reported in the counterparty reference data record of the head office undertaking and is calculated taking into account all foreign branches of the legal entity. Consequently, in the case of foreign branches and special funds, the value “NA” (Non-applicable) is reported.

This attribute is only applicable at the legal entity level (not for a foreign branch). Therefore, the value reported in this data attribute (in the data record of the head office representing the legal entity) is assessed taking into account the total employees (staff headcount), annual turnover, and/or the annual balance sheet of the head office and all foreign branches (if any) of a legal entity. At the same time, as a general rule, the enterprise size is determined on the basis of the accounts and other data of the enterprise, without taking into account partner enterprises, linked enterprises or consolidated accounts.

The classification of the enterprise size is performed in accordance with Article 2 of the Annex to Recommendation 2003/361/EC, taking into account the staff headcount and financial ceilings as follows:

1. The category of **micro, small and medium-sized enterprises (SMEs)** is made up of enterprises which employ fewer than 250 persons and which have an annual turnover not exceeding EUR 50 million, and/or an annual balance sheet total not exceeding EUR 43 million;
2. Within the SME category, a **small enterprise** is defined as an enterprise which employs fewer than 50 persons and whose annual turnover and/or annual balance sheet total does not exceed EUR 10 million;

3. Within the SME category, a **microenterprise** is defined as an enterprise which employs fewer than 10 persons and whose annual turnover and/or annual balance sheet total does not exceed EUR 2 million.

Please note that these definitions of enterprise size deviate from the definition of SMEs subject to the reduction factor for capital requirements according to Article 501(2)(b) of the CRR, which states that only the annual turnover is taken into account.

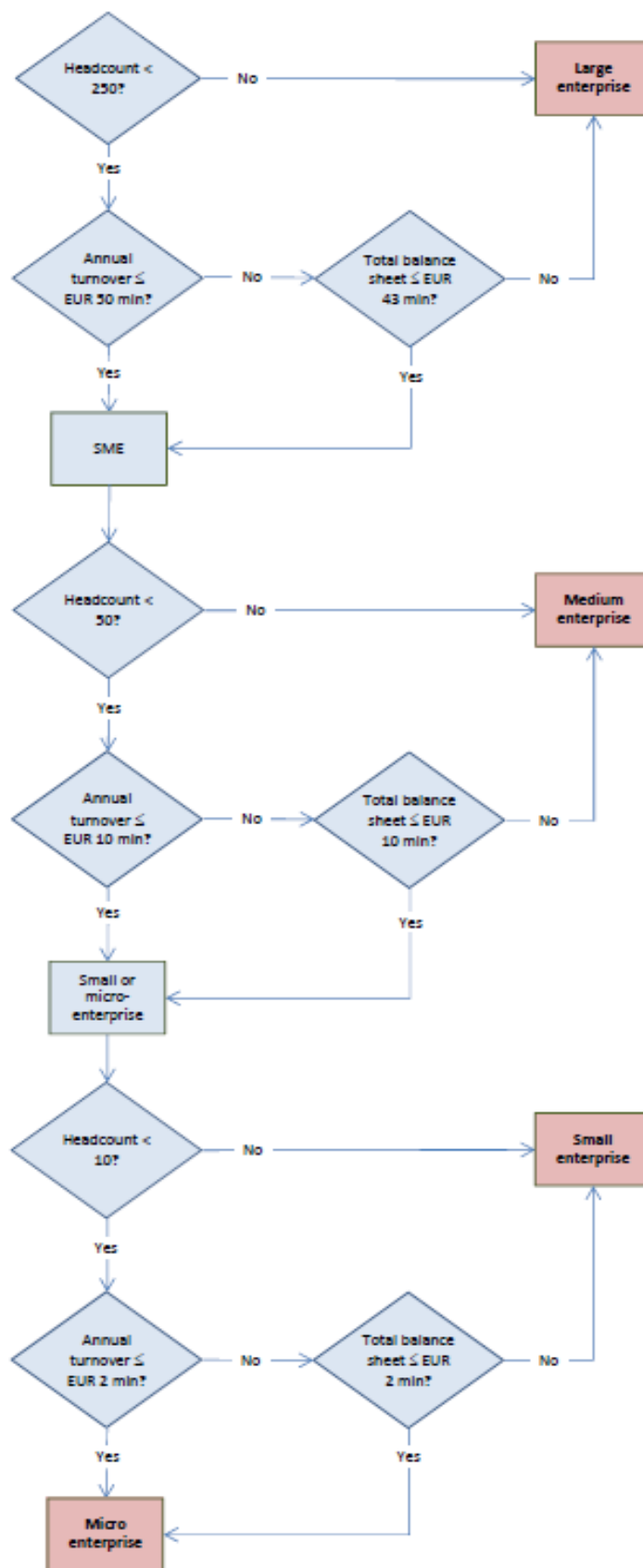
According to Article 4 of the Annex to Commission Recommendation 2003/361/EC, the data to apply to the headcount of staff and the financial amounts are those relating to the latest approved accounting period and are calculated on an annual basis. They are taken into account from the date of closure of the accounts. The amount selected for the turnover is calculated excluding value added tax (VAT) and other indirect taxes. Where, at the date of closure of the accounts, an enterprise finds that, on an annual basis, it has exceeded or fallen below the headcount or financial ceilings stated in Article 2 of the Annex to Recommendation 2003/361/EC, this will not result in the loss or acquisition of the status of medium-sized, small or microenterprise unless those ceilings are exceeded over two consecutive accounting periods. In the case of newly established enterprises whose accounts have not yet been approved, the data to apply is to be derived from a *bona fide* estimate made in the course of the financial year.

Finally, all the parameters used in the calculation of the enterprise size (number of employees, annual turnover and balance sheet total) refer to the same year. When this is not the case, the enterprise size is reported for the last year for which all parameters are available.

A value of “NR” (Not required) may be reported if the role of the counterparty is anything other than debtor.

Note that a value of “NP” (Not reported) may technically be provided.

The following flowchart outlines the logic applied in arriving at a value for enterprise size:



4.3.16 Date of enterprise size

Definition: The date to which the value provided in the ‘enterprise size’ refers. This is the date of the latest data used to classify or review the classification of the enterprise.

This data attribute represents the date to which the data used to establish the enterprise size of a counterparty refer.

The date of enterprise size is the date to which the value provided in the ‘enterprise size’ refers.

A value of “9999-01-01” (Not required) may be reported if the role of the counterparty is anything other than debtor.

If the value “NA” (Non-applicable) is reported for the data attribute “Enterprise size”, the value “8888-01-01” (Non-applicable) must be reported in the data attribute “Date of enterprise size”.

Note that a value of “7777-01-01” (Not reported) may technically be provided.

4.3.17 Number of employees

Definition: Number of employees working for the counterparty, in accordance with Article 5 of the Annex to Recommendation 2003/361/EC.

The number of employees must be reported for debtors resident in a Reporting Member State to which at least one instrument has been originated on or after 1 September 2018.

This data attribute represents the staff headcount of a counterparty.

As already described for the data attribute “Enterprise size”, according to Article 4 of the Annex to Commission Recommendation 2003/361/EC, the data to apply to the staff headcount are those relating to the latest approved accounting period and are calculated on an annual basis. They are taken into account from the date of closure of the accounts. In the case of newly established enterprises, whose accounts have not yet been approved, the applicable data are to be derived from a *bona fide* estimate made in the course of the financial year.

Similar to “Enterprise size”, “Number of employees” is applicable only to enterprises. Moreover, this attribute is applicable only at the legal entity level (not for a foreign branch) and the value reported (in the data record of the head office undertaking representing the legal entity) is assessed taking into account the number of employees of the head office and all foreign branches (if any) of the legal entity.

If a counterparty is a foreign branch or a special fund, “NA” (Non-applicable) is reported.

According to Article 4 of the Annex to Commission Recommendation 2003/361/EC, the headcount corresponds to the number of annual work units (AWU) or Full Time Equivalent (FTE), i.e. the number of persons who worked full-time within the enterprise in question or on its behalf during the entire reference year under consideration.

This data attribute is updated whenever the reporting agent is aware of a change, and at least when a new instrument is issued vis-à-vis the counterparty.

Example: The number of employees of a debtor

A legal entity L, resident in a Reporting Member State, has two foreign branches. Additionally, the legal entity has one subsidiary (i.e. another legal entity controlled by L). The legal entity employs 1,000 employees in the country of the head office, while the two foreign branches have 100 and 200 employees, respectively. The subsidiary has 500 employees.

The legal entity is a debtor to an instrument reported in AnaCredit. Therefore, the counterparty reference data report of the debtor includes the number of employees.

The value to be reported in the data attribute “Number of employees” in the counterparty reference data of the head office undertaking (representing the counterparty L) is equal to 1,300 (adding up the employees of the domestic part and of the two foreign branches, while not including the subsidiary).

A value of “NR” (Not required) may be reported if the counterparty is not resident in a Reporting Member State or if the role debtor (with at least one instrument originated at or after 1 September 2018) does not apply.

Note that a value of “NP” (Not reported) may technically be provided.

4.3.18 Date of number of employees

Reporting agents should report the date to which the value provided in the ‘Number of employees’ refers.

A value of “9999-01-01” (Not required) may be reported if the counterparty is not resident in a Reporting Member State or if the role debtor (with at least one instrument originated at or after 1 September 2018) does not apply.

If the value “NA” (Non-applicable) is reported for the data attribute “Number of employees”, the value “8888-01-01” (Non-applicable) must be reported in the data attribute “Date of number of employees”.

Note that a value of “7777-01-01” (Not reported) may technically be provided.

4.3.19 Balance sheet total

Definition: The carrying value of the counterparty's total assets in accordance with Regulation (EU) No 549/2013.

The balance sheet total must be reported for debtors resident in a Reporting Member State to which at least one instrument has been originated at or after 1 September 2018.

This data attribute measures the balance sheet of the counterparty.

The carrying value of the counterparty's total assets referring to the latest approved accounting period of the legal entity is reported. This amount is reported in units of euro. Foreign currency amounts are converted into euro at the respective [ECB euro foreign exchange reference rate](#) (i.e. the mid-rate) on the relevant reference date.

As already described for the data attribute "Enterprise size", according to Article 4 of the Annex to Commission Recommendation 2003/361/EC, the data to apply to the balance sheet total are those relating to the latest approved accounting period and are calculated on an annual basis. They are taken into account from the date of closure of the accounts. In the case of newly established enterprises, whose accounts have not yet been approved, the applicable data are to be derived from a bona fide estimate made in the course of the financial year.

The balance sheet total is to be calculated in relation to the enterprise only (i.e. no consolidation is performed).

Analogously to the "Enterprise size", the "Balance sheet total" is applicable only to enterprises. Moreover, this attribute is applicable only at the legal entity level (not for a foreign branch) and the value reported (in the data record of the head office undertaking representing the legal entity) is assessed taking into account the balance sheet total of the head office and all foreign branches (if any) of the legal entity.

If a counterparty is a foreign branch, "NA" (Non-applicable) is reported.

This data attribute is updated whenever the reporting agent is aware of a change, and at least when a new instrument is issued vis-à-vis the counterparty.

A value of "NR" (Not required) may be reported if the counterparty is not resident in a Reporting Member State or if the role debtor (with at least one instrument originated at or after 1 September 2018) does not apply.

Note that a value of "NP" (Not reported) may technically be provided.

4.3.20 Date of balance sheet total

Reporting agents should report the date to which the value provided in the 'Balance sheet total' refers.

A value of "9999-01-01" (Not required) may be reported if the counterparty is not resident in a Reporting Member State or if the role debtor (with at least one instrument originated at or after 1 September 2018) does not apply.

If the value "NA" (Non-applicable) is reported for the data attribute "Balance sheet total", the value "8888-01-01" (Non-applicable) must be reported in the data attribute "Date of balance sheet total".

Note that a value of “7777-01-01” (Not reported) may technically be provided.

4.3.21 Annual turnover

Definition: The annual sales volume net of all discounts and sales taxes of the counterparty in accordance with Recommendation 2003/361/EC. It is equivalent to the concept of 'total annual sales' in Article 153(4) of Regulation (EU) No 575/2013.

The annual turnover must be reported for debtors resident in a Reporting Member State to which at least one instrument has been originated at or after 1 September 2018.

This data attribute represents the annual turnover (sales) of a counterparty.

The annual turnover is reported in units of euro. Foreign currency amounts are converted into euro at the respective [ECB euro foreign exchange reference rate](#) (i.e. the mid-rate) at the relevant reference date.

As already described for the more general attribute “Enterprise size”, according to Article 4 of the Annex to Commission Recommendation 2003/361/EC the data to apply to the annual turnover are those relating to the latest approved accounting period and calculated on an annual basis. They are taken into account from the date of closure of the accounts. The amount reported for the turnover is calculated excluding value added tax (VAT) and other indirect taxes. In the case of newly established enterprises, whose accounts have not yet been approved, the data to apply are to be derived from a bona fide estimate made in the course of the financial year.

Analogously to the “Enterprise size”, the “Annual turnover” is applicable only to enterprises. Moreover, this attribute is applicable only at the legal entity level (not for a foreign branch) and the value reported (in the data record of the head office undertaking representing the legal entity) is assessed taking into account the annual turnover of the head office and all foreign branches (if any) of the legal entity.

If a counterparty is a foreign branch, “NA” (Non-applicable) is reported.

This data attribute is updated whenever the reporting agent is aware of a change, and at least when a new instrument is issued vis-à-vis the counterparty.

A value of “NR” (Not required) may be reported if the counterparty is not resident in a Reporting Member State or if the role debtor (with at least one instrument originated at or after 1 September 2018) does not apply.

Note that a value of “NP” (Not reported) may technically be provided.

4.3.22 Date of annual turnover

Reporting agents should report the date to which the value provided in the ‘Annual turnover’ refers.

A value of “9999-01-01” (Not required) may be reported if the counterparty is not resident in a Reporting Member State or if the role debtor (with at least one instrument originated at or after 1 September 2018) does not apply.

If the value “NA” (Non-applicable) is reported for the data attribute “Annual turnover”, the value “8888-01-01” (Non-applicable) must be reported in the data attribute “Date of annual turnover”.

Note that a value of “7777-01-01” (Not reported) may technically be provided.

4.3.23 Accounting standard

Definition: Accounting standard used by the observed agent’s legal entity. If the reporting agent is subject to Regulation (EU) 2015/534 (ECB/2015/13), the data is recorded in accordance with the accounting standard – International Financial Reporting Standards (IFRS) or national generally accepted accounting principles (GAAP) – applied to fulfil the requirements under Regulation (EU) 2015/534 (ECB/2015/13) by the observed agent’s legal entity.

The accounting standard must be reported for reporting agents only. Otherwise, for counterparties which are not reporting agents, the value “NR” (Not required) must be reported.

This data attribute represents the accounting standard applied by the legal entity of the observed agent. The accounting standard describes not only the accounting standard according to which instruments are assigned to the accounting portfolio but also all other relevant rules in accordance with which the instrument is recognised in the balance sheet, the carrying amount is established, the impairment is assessed, etc.

The possible reporting options are:

- *IFRS* must be reported if the legal entity applies IFRS, as applicable under Regulation (EC) No 1606/2002 of the European Parliament and of the Council;
- *National GAAP consistent with IFRS* must be reported if the accounting standard applied by the legal entity of the observed agent is a national accounting framework developed under Council Directive 86/635/EEC applying IFRS criteria for the instruments;
- *National GAAP not consistent with IFRS* must be reported if the accounting standard applied by the legal entity of the observed agent is a national accounting framework developed under Council Directive 86/635/EEC not applying IFRS criteria for the instruments;

This data attribute represents the accounting standard used by the reporting agent’s legal entity. In particular, if the reporting agent is subject to Regulation (EU) 2015/534 (ECB/2015/13), the data are recorded in accordance with the accounting standard – International Financial Reporting Standards (IFRS) or national generally accepted accounting principles (GAAP) – applied to fulfil the requirements under Regulation (EU) 2015/534 (ECB/2015/13) by the observed agent’s legal entity.

Note that a value of “NP” (Not reported) may technically be provided.

Note that the accounting classification in the accounting table will be reviewed when IFRS 9 comes into force on 1 January 2018.

4.4 Reporting requirements for special categories of counterparty

4.4.1 International Organisations

Reporting requirements are reduced in the case of counterparties that are international organisations, i.e. counterparties listed on the “International Organisations” sheet of the “Counterparty Template and Rules” file. When reporting these international organisation counterparties, reporting agents should adhere to the following guidance:

- The attribute [Address: country] must be reported with one of the following two values:
 - “E\$” (European International Organisations);
 - “N\$” (Non-European International Organisations).
- The attribute [RIAD identifier] must be reported and its value must be a value from the "RIAD identifier" column (column E) in the table on the "International Organisations" sheet.”.
- The attributes [Reference date], [Reporting agent identifier], [Counterparty identifier], [Name], [Address: country], [Institutional sector] and all the role attributes (at least one must be “true”) must be reported as usual. All other attributes may be reported as either “NR” or “NA”, depending on the attribute.

Section 5: Credit Data Attributes

This section deals with the AnaCredit Credit and Credit Risk Templates (i.e. all templates except the Counterparty Reference Template). The Central Bank undertook a significant amount of localisation of the Counterparty Reference tables. Additional attributes were included in order to assist in collecting and uniquely identifying all counterparties in Ireland. In contrast the Central Bank has made very limited deviations from the core AnaCredit tables as outlined in the ECB regulations. As such, this section contains relatively limited detail, and instead refers directly to the ECB AnaCredit Manual (Part II) for the detailed guidance notes.

With the exception of the Accounting dataset for Banks, all templates must be reported on a monthly basis. The information that should be included varies across the templates, with some templates (e.g. the Financial Dataset) requiring a monthly update on the information on all instruments. Other templates (e.g. Instrument dataset), should only include new instruments, or instruments where the information has changed. The requirement in each template is detailed in Table 8 below.

- “On-changes” means that initially the information is reported to AnaCredit for all reportable instruments, but subsequently the dataset is only reported for (a) new instruments, protection items etc.; or (b) which any of the entries in the dataset have changed compared with the data previously reported.
- “Each reference period” means that all information must be updated each month.

Table 8. Update Frequency

Dataset	Template Frequency	Update frequency	Granularity
Instrument	Monthly	On-changes	Instrument
Financial	Monthly	Each reference period	Instrument
Counterparty-Instrument	Monthly	On-changes	Counterparty-Instrument
Joint Liabilities	Monthly	Each reference period	Counterparty-Instrument
Protection received	Monthly	On-changes	Protection Item
Instrument-protection	Monthly	Each reference period	Instrument-Protection
Counterparty Risk data	Monthly	Each reference period	Counterparty
Counterparty default data	Monthly	Each reference period	Counterparty
Accounting Dataset	Quarterly	Each reference period	Instrument

5.1 Instrument dataset

Data Attribute	ECB Manual Part II: Section
Reference date	n.a.
Reporting agent identifier	2.2.1
Observed agent identifier	2.2.2
Contract identifier	2.2.4
Instrument identifier	2.2.5
Type of instrument	3.4.1
Amortisation type	3.4.15
Currency	3.4.3
Fiduciary instrument	3.4.20
Inception date	3.4.4
End date of interest-only period	3.4.10
Interest rate cap	3.4.13
Interest rate floor	3.4.13
Interest rate reset frequency	3.4.9
Interest rate spread/margin	3.4.12
Interest rate type	3.4.8
Legal final maturity date	3.4.6
Commitment amount at inception	3.4.21
Payment frequency	3.4.16
Project finance loan	3.4.2
Purpose	3.4.14
Recourse	3.4.7
Reference rate	3.4.11
Settlement date	3.4.5
Subordinated debt	3.4.18
Syndicated contract identifier	3.4.17
Repayment rights	3.4.19
Fair value changes due to changes in credit risk before purchase	3.4.22

5.2 Financial dataset

Data Attribute	ECB Manual Part II: Section
Reference date	n.a.
Reporting agent identifier	2.2.1
Observed agent identifier	2.2.2
Contract identifier	2.2.4
Instrument identifier	2.2.5
Interest rate	4.4.1
Next interest rate reset date	4.4.2
Default status of the instrument	4.4.4
Date of the default status of the instrument	4.4.5
Transferred amount	4.4.3
Arrears for the instrument	4.4.6
Date of past due for the instrument	4.4.7
Type of securitisation	4.4.8
Outstanding nominal amount	4.4.9
Accrued interest	4.4.11
Off-balance sheet amount	4.4.10

5.3 Counterparty-instrument dataset

Data Attribute	ECB Manual Part II: Section
Reference date	n.a.
Reporting agent identifier	2.2.1
Observed agent identifier	2.2.2
Counterparty identifier	2.2.3
Contract identifier	2.2.4
Instrument identifier	2.2.5
Counterparty role	6.4.1

5.4 Joint liabilities dataset

Data Attribute	ECB Manual Part II: Section
Reference date	n.a.
Reporting agent identifier	2.2.1
Observed agent identifier	2.2.2
Counterparty identifier	2.2.3
Contract identifier	2.2.4
Instrument identifier	2.2.5
Joint liability amount	7.4.1

5.5 Protection received dataset

Data Attribute	ECB Manual Part II: Section
Reference date	n.a.
Reporting agent identifier	2.2.1
Observed agent identifier	2.2.2
Protection identifier	2.2.6
Protection provider identifier	2.2.7
Type of protection	9.4.3
Protection value	9.4.4
Type of protection value	9.4.5
Protection valuation approach	9.4.6
Real estate collateral location	9.4.7
Date of protection value	9.4.8
Maturity date of protection	9.4.2
Original protection value	9.4.9
Date of original protection value	9.4.10

5.6 Instrument-protection received dataset

Data Attribute	ECB Manual Part II: Section
Reference date	n.a.
Reporting agent identifier	2.2.1
Observed agent identifier	2.2.2
Contract identifier	2.2.4
Instrument identifier	2.2.5
Protection identifier	2.2.6
Protection allocated value	8.4.1
Third party priority claims against the protection	8.4.2

5.7 Counterparty risk dataset

Data Attribute	ECB Manual Part II: Section
Reporting agent identifier	n.a.
Observed agent identifier	2.2.1
Counterparty identifier	2.2.2
Probability of default	2.2.3
Date of probability of default	n.a.

5.8 Counterparty default dataset

Data Attribute	ECB Manual Part II: Section
Reference date	n.a.
Reporting agent identifier	2.2.1
Observed agent identifier	2.2.2
Counterparty identifier	2.2.3
Default status of the counterparty	10.4.1
Date of the default status of the counterparty	10.4.2

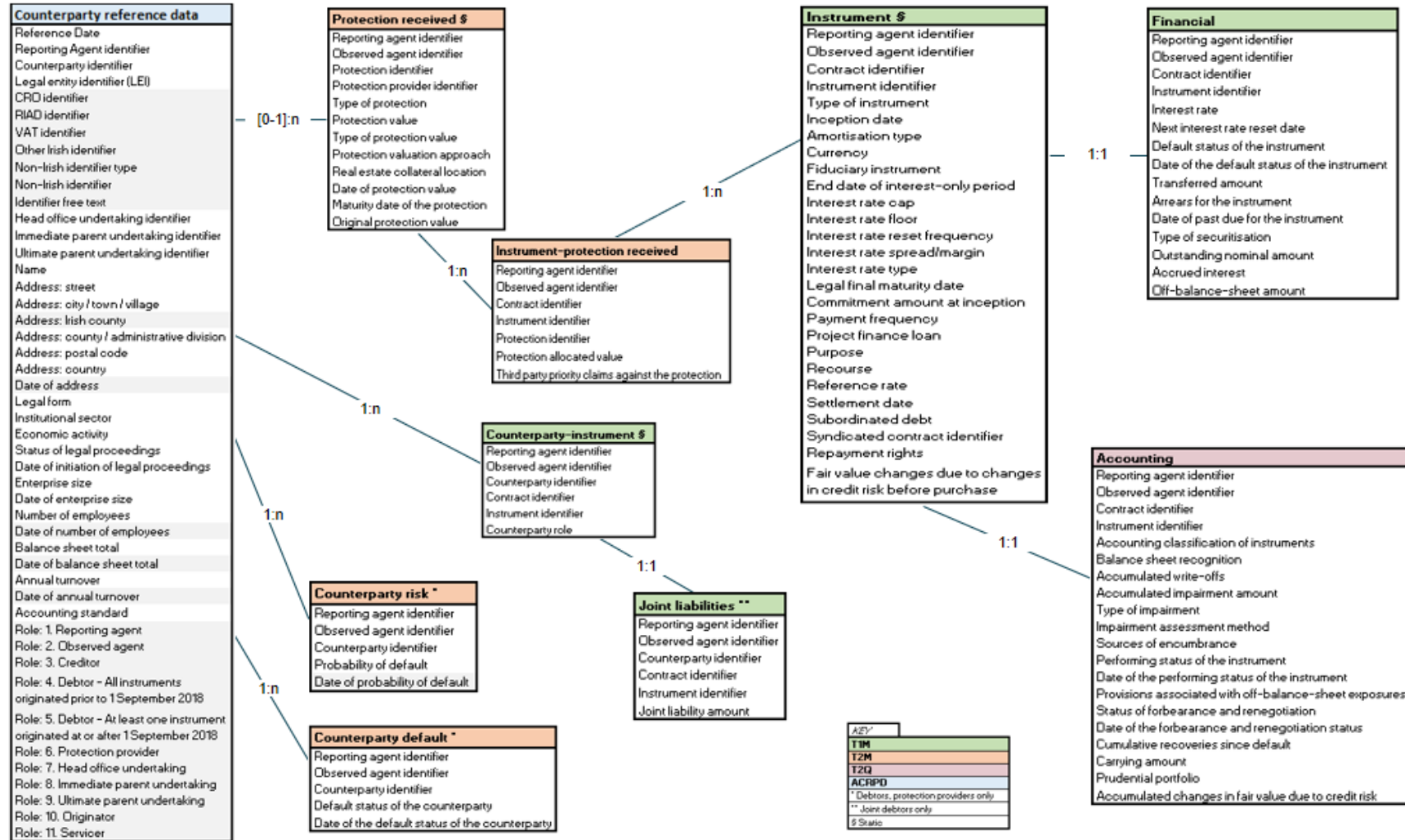
5.9 Accounting dataset

Data Attribute	ECB Manual Part II: Section
Reference date	n.a.
Reporting agent identifier	2.2.1
Observed agent identifier	2.2.2
Contract identifier	2.2.4
Instrument identifier	2.2.5
Accounting classification of instruments	5.4.1
Balance sheet recognition	5.4.2
Accumulated write-offs	5.4.4
Accumulated impairment amount	5.4.5
Type of impairment	5.4.6
Impairment assessment method	5.4.7
Sources of encumbrance	5.4.3
Accumulated changes in fair value due to credit risk	5.4.8
Performing status of the instrument	5.4.9
Date of performing status of the instrument	5.4.10
Provisions associated with off-balance sheet exposures	5.4.11
Status of forbearance and renegotiation	5.4.12
Date of the forbearance and renegotiation status	5.4.13
Cumulative recoveries since default	5.4.14
Prudential portfolio	5.4.15
Carrying amount	5.4.16

Appendix I: Counterparty Reference Data

Counterparty reference data
Reference Date
Reporting Agent identifier
Counterparty identifier
Legal entity identifier (LEI)
CRO identifier
RIAD identifier
VAT identifier
Other Irish identifier
Non-Irish identifier type
Non-Irish identifier
Identifier free text
Head office undertaking identifier
Immediate parent undertaking identifier
Ultimate parent undertaking identifier
Name
Address: street
Address: city / town / village
Address: Irish county
Address: county / administrative division
Address: postal code
Address: country
Date of address
Legal form
Institutional sector
Economic activity
Status of legal proceedings
Date of initiation of legal proceedings
Enterprise size
Date of enterprise size
Number of employees
Date of number of employees
Balance sheet total
Date of balance sheet total
Annual turnover
Date of annual turnover
Accounting standard
Role: 1. Reporting agent
Role: 2. Observed agent
Role: 3. Creditor
Role: 4. Debtor – All instruments originated prior to 1 September 2018
Role: 5. Debtor – At least one instrument originated at or after 1 September 2018
Role: 6. Protection provider
Role: 7. Head office undertaking
Role: 8. Immediate parent undertaking
Role: 9. Ultimate parent undertaking
Role: 10. Originator
Role: 11. Servicer

Appendix II: AnaCredit Data Model



Appendix III: Reporting counterparty reference data attributes

Please refer to the “Reporting counterparty reference data attributes” file on the [AnaCredit webpage](#), which contains numerous flowcharts outlining the logic to apply when reporting certain counterparty reference data attributes.

Appendix IV: Clarifications regarding AnaCredit reporting in light of the COVID-19 crisis

Instruments that are reportable to AnaCredit may be subject to COVID-19 relief measures. Such measures may take various forms. The most common measures include public guarantees and legislative and non-legislative (private) debt moratoria, although some types of measure may not exist in all countries. Other forms of support measure include (i) the option for individual debtors to ask their credit institutions to reschedule payment obligations as a result of the COVID-19 crisis, (ii) restrictions imposed by governments on credit institutions' ability to revoke credit lines during the COVID-19 pandemic, (iii) the automatic extension of certain protections in line with the postponement of loan repayments, (iv) subsidised loan programmes and (v) loan programmes with government guarantees covering some or all of the credit risk.

Loans covered by COVID-19 relief measures are subject to the same requirements as any other instrument that is reported to AnaCredit. Consequently, reporting agents should continue to comply with the existing requirements set out in the AnaCredit Regulation and take note of the clarifications provided in the AnaCredit Reporting Manual.

Nevertheless, while there is no specific guidance regarding the reporting of loans covered by COVID-19 relief measures, some of the measures applied to such loans do have an impact on data that are subject to AnaCredit reporting, so additional guidance is provided here in order to facilitate consistent and harmonised reporting. In particular, these clarifications seek to ensure the consistency and comparability of risk metrics across all reporting agents, since monitoring of the provision of credit and credit risk is especially important in the context of the current crisis. Moreover, as emphasised by the European Banking Authority (EBA), while national governments and EU bodies are proposing and adopting measures aimed at addressing the adverse systemic economic impact of the COVID-19 pandemic, the main principle underlying the accounting methodology, the identification of forborne exposures and the definition of default in the prudential framework is the need to ensure the effective identification of credit-impaired assets on banks' balance sheets.

Loans subject to debt moratoria

Many different types of legislative and non-legislative debt moratoria have been implemented in the various Member States. One common feature of such moratoria is the fact that they lead to a change in the schedule of payments, suspending, postponing or reducing payments (principal, interest or both) – typically for a limited period of time. This affects the whole of the payment

schedule and may lead to increased payments after the end of the moratorium or an increase in the duration of the loan. In order to achieve this, the initial contract is modified, with the terms and conditions of the loan being adjusted accordingly. It should be noted, in this regard, that the application of debt moratoria in response to the COVID-19 crisis may be visible in specific data attributes reportable to AnaCredit (such as the type of amortisation, the payment frequency, the end dates of interest-only periods, or the legal final maturity date where payment of the scheduled final instalment of the loan is postponed). AnaCredit datasets and attributes should be reported accordingly, accurately reflecting the actual situation as at the reference date for reporting. For example, if a debt moratorium involves changes to the schedule of payments, such that payments are rescheduled to a date after the original maturity date, the legal final maturity date needs to be updated accordingly. Likewise, the reporting agent should also assess whether the change entails modifications to the amortisation schedule or the end date of the interest-only period (which is particularly relevant if the moratorium suspends payments of principal).

Overall, reporting agents need to think carefully about the data attributes that are affected by the application of a debt moratorium and should follow AnaCredit's reporting instructions consistently. The guidance below outlines a number of considerations which are particularly important with regard to the identification of (i) renegotiated loans, (ii) forborne exposures and (iii) loans in default. At the same time, it should be noted that, where relevant, AnaCredit is aligned with the EBA's implementing technical standards on the identification of forborne instruments and defaulted instruments and counterparties and the corresponding guidelines, and the clarifications below should be interpreted accordingly.

Status of forbearance and renegotiation

Modifications to an instrument's terms and conditions are captured by the AnaCredit data attribute "status of forbearance and renegotiation", which indicates whether modified instruments qualify as renegotiated loans or forborne loans or are neither forborne nor renegotiated. The "date of the forbearance and renegotiation status" should be updated accordingly.

In line with the prudential framework, as well as the EBA's [Guidelines on legislative and non-legislative moratoria on loan repayments applied in the light of the COVID-19 crisis](#), the application of a debt moratorium does not automatically lead to a loan being classified as in default, forborne or unlikely to be repaid. Nevertheless, credit institutions are still required to assess the credit quality of instruments benefiting from such measures (bearing in mind the modified schedule of payments) and identify any situation where a debtor is unlikely to pay. In particular, if that assessment leads to the identification of forbearance in accordance

with the prudential framework, the relevant forbearance status should be reported under the AnaCredit data attribute “status of forbearance and renegotiation”. The EBA guidelines set out the criteria that general payment moratoria have to fulfil in order to be regarded as not meeting the definition of forbearance. It should be noted, however, that if an instrument has already been subject to forbearance measures prior to the application of such a moratorium, that classification should not be changed.

Otherwise, if that assessment does not result in the identification of forbearance, consideration should be given to whether the modified loan fulfils the definition of a renegotiated instrument. The key principle here is that a change to a contract resulting exclusively from a debt moratorium which, rather than being the result of a bilateral negotiation between the bank and the borrower, is instead applied to a broad range of borrowers or products (the requirement that general payment moratoria have to fulfil in order not to meet the definition of forbearance), is not regarded as a renegotiation. This is particularly important for monetary analysis, which is reliant on the accurate identification of renegotiation, as reflected in MFI interest rate statistics (where renegotiation requires the debtor to be actively involved in the adjustment of the terms and conditions of an existing loan or deposit contract – see the definition of “renegotiation” in the [Manual on MFI interest rate statistics](#)). For example, instruments which are not subject to forbearance, but whose terms and conditions have been modified by the application of debt moratoria in response to the COVID-19 crisis without any active involvement of the debtor with the aim of renegotiating the terms and conditions of the contract, should be reported as “not forborne or renegotiated”. Conversely, instruments which are not subject to forbearance, but whose financial conditions have been modified with the active involvement of the debtor with the aim of moving to a different treatment or a treatment going beyond what is covered by a debt moratorium, are considered to have been renegotiated and should be reported as a “renegotiated instrument without forbearance measures” ([AnaCredit Reporting Manual, Part II](#), page 155, lines 15-18). Please note that the above explanations apply accordingly to cases where the “status of forbearance and renegotiation” was already “renegotiated instrument without forbearance measures” prior to the application of the debt moratorium. Specifically, while the status itself remains essentially unchanged, the “date of the forbearance and renegotiation status” is updated only if the instrument’s conditions are modified with the active involvement of the debtor.

Moreover, when creditors lend new funds to existing clients during the application of the moratorium (whereby that new lending should follow the normal credit policies and be

based on an assessment of the clients' creditworthiness), new contracts are created and new instruments are issued, potentially replacing or complementing existing ones. Here, too, the AnaCredit requirements and clarifications regarding the "status of forbearance and renegotiation" apply accordingly – particularly the clarifications provided in [Part II of the AnaCredit Reporting Manual](#) (pages 155 and 156, lines 38-43 and 1-20 respectively). In addition, the clarifications provided in [Q&A 2020/0013](#) apply in respect of the purpose of a newly created loan that replaces an existing loan – i.e. the purpose of the new loan is, in principle, the same as the purpose of the replaced loan.

Default status

By the same token, reporting agents should continue to report information on loans' default status in accordance with Article 178 of the Capital Requirements Regulation and the corresponding EBA guidelines. That assessment should be conducted on the basis of the modified schedule of payments, with the exposure continuing to be regarded as "performing" if there are no concerns in that respect. Thus, even if loans and debtors are subject to debt moratoria, credit institutions are still required to assess (in accordance with their regular policies and practices governing the assessment of unlikelihood to pay) whether economic losses are going to be incurred in such cases, albeit that assessment should be carried out on the basis of the modified schedule of payments (looking, for example, at whether, despite the suspension of payments, the debtor is still likely to have difficulty repaying the loan – for instance, because its payment capabilities are going to be affected even after the COVID-19 pandemic is over). That assessment can result in a loan being categorised as "unlikely to pay" despite no amounts being due on account of the modified repayment schedule. It should also be noted that the EBA guidelines on the application of the definition of default under Article 178 of Regulation (EU) No 575/2013 state that where repayment of an obligation is suspended because of a law allowing this option or other legal restrictions, the counting of days past due should also be suspended during that period. However, the EBA has also clarified that in cases where the moratorium applies to instruments that were already classified as being in default at the time of the application of the moratorium, that classification must be maintained. In the same vein, credit institutions should continue to assess exposures in accordance with the applicable requirements to see whether they are performing or non-performing and should report that information to AnaCredit accordingly.

Days past due and arrears

The application of a debt moratorium results in changes to the schedule of payments. Consequently, the amount of arrears should be calculated on the basis of the amended/new payment schedule, and the AnaCredit attributes “date of past due for the instrument” and “arrears for the instrument” should be reported accordingly. Please note that this also affects the definition of default via the 90 days past due criterion, as delays should be calculated on the basis of the modified schedule of payments (see the above clarifications regarding default status).

Loans covered by public/government guarantees offered in response to the COVID-19 crisis

As regards loans covered by public/government guarantees offered in response to the COVID-19 pandemic (whereby such guarantees typically concern newly issued loans, with the government agreeing, for example, to guarantee all eligible loans granted after the onset of the COVID-19 pandemic), reporting agents should continue to fulfil the requirements set out in Sections 8 and 9 of [Part II of the AnaCredit Reporting Manual](#) in respect of the reporting of protection to AnaCredit. Thus, there are no special requirements in relation to loans covered by public guarantees. By the same token, there are no specific reporting requirements which allow public guarantees issued in response to the COVID-19 pandemic to be clearly distinguished from other guarantees. Overall, reporting agents should think carefully about the loans and data attributes that are affected by the issuance of state guarantees (both in the context of COVID-19 and more generally), complying with the requirements set out in the AnaCredit Regulation and taking note of the clarifications provided in the AnaCredit Reporting Manual in that regard.

In particular, the following general guidance applies to loans secured by public/government guarantees issued in response to the COVID-19 pandemic:

All public guarantees (i.e. guarantees securing reportable loans) and collateral that are offered to reporting agents in response to the COVID-19 pandemic should be reported to AnaCredit as credit risk mitigants as soon as they are provided to the institution in question. The “date of original protection value” should be the date as of which the bank regards the protection as securing the loan.

Reporting agents should continue to apply the normal credit policies when it comes to the valuation of protection measures (be it individual guarantees or portfolio guarantees) and their allocation to specific instruments. In particular, protection values may be based on the amount of outstanding credit (e.g. 70% or 80% of outstanding debt), so they can vary over time.

As regards the reporting of the protection provider's identity in the "protection received" dataset, the general AnaCredit guidance applies – i.e. reporting agents should identify the guarantor and report its data accordingly. The guarantor may be the state/government itself or a government-related entity. In particular, in line with the definition of a protection provider in Article 1(13) of the AnaCredit Regulation, the protection provider should be the counterparty that is obliged to make payments to the creditor if the debtor fails to fulfil the obligation to make repayments that arises under the instrument secured by the guarantee ([AnaCredit Reporting Manual, Part II](#), page 211, lines 4-9). That counterparty may be different from the entity that manages and administrates the public guarantee, which is not subject to AnaCredit reporting as the administrator of the protection item (AnaCredit reporting only requires protection providers of protection items). Reporting agents should, in this regard, ensure that counterparty reference data include both information about the protection provider and information about the relevant immediate and ultimate parent undertakings.