Public

LEI-CDF 3.1 and RR-CDF 2.1 and REPEX-CDF 2.1 XML Samples – Description
Version 1.1 Final, 2021-09-30
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### About this Document

This document is related to the introduction of the upcoming LEI-CDF format version 3.1 and RR-CDF format version 2.1. It provides additional information for the xml samples provided together with this document.

### Change History

This section records the history of all changes to this document.

<table>
<thead>
<tr>
<th>Date</th>
<th>Version</th>
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<tbody>
<tr>
<td>2021-09-30</td>
<td>1.1</td>
<td>Adding Sample 11 for new REPEX-CDF version 2.1. Adding AffectedField to Legal Entity</td>
<td>GLEIF</td>
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<tr>
<td></td>
<td></td>
<td>Event in Sample 3.</td>
<td></td>
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<tr>
<td>2021-05-31</td>
<td>1.0</td>
<td>Final version published on GLEIF website</td>
<td>GLEIF</td>
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</tbody>
</table>

All changes made during creation (for clarity and reading ease as well as significant changes), increase the version number by 0.1. The final version of the document gets version number 1.0.

### GLEIF Contact

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Acknowledgements

The following description and samples, together with the accompanying XML files, are intended to showcase LEI Record Sets compliant with the upcoming CDF versions (LEI-CDF 3.1, RR-CDF 2.1, and Reporting Exceptions format REPEX-CDF 2.1). The samples cover use cases related to the addition of Fund Relationships, Legal Entity Events and Government Entities/International Organizations to the Global LEI System and may not include all changes in the updated CDF formats. Some samples are illustrative, others are based on real world examples and LEIs already registered in the Global LEI Repository.

Real world examples have been validated using publicly available sources at the time of their creation and great care has been taken to provide correct and useful examples. Any discrepancy or ambiguity found is noted in the sample descriptions below. However, it is not excluded that the entities and their relationships change over time and LEI Issuers with their local knowledge and access to additional documents provided by the Legal Entity may come to a different conclusion when validating the entity and/or relationship data. While every care has been taken in the compilation of this information, the sample data is meant to be used only for testing purposes and GLEIF will not be held responsible for any loss, damage, or inconvenience caused by inaccuracy of the related example data.

All samples represent Legal Entities already having an LEI prior to the introduction of the new policy. Unless noted otherwise, Registration Authority, Validation Authority and Legal Form codes were not changed and taken from versions of the RA and ELF code lists that were current at the time the samples were created (RA list v1.5 and ELF code list v1.3). Future additions to both lists may introduce new codes that more appropriately represent the registration authority and/or legal form for the entities shown in these samples.
File Reference

Sample 1: Fund Relationships – Umbrella Structure
- 635400OCWIKPSEDOHY65_lei3.xml
- 635400OCWIKPSEDOHY65_rr2.xml
- 635400OCWIKPSEDOHY65_repex2.xml

Sample 2: Fund Relationships – Master/Feeder
- 6354009BJOFO62XYIX17_lei3.xml
- 6354009BJOFO62XYIX17_rr2.xml
- 6354009BJOFO62XYIX17_repex2.xml

Sample 3: Legal Entity Event – Transition of a MERGED LEI
- 815600828BCFF72F0954_before_lei3.xml
- 815600828BCFF72F0954_after_lei3.xml

Sample 4: Legal Entity Event – Transition of a RETIRED LEI
- 969500QK2JTHB072U056_before_lei3.xml
- 969500QK2JTHB072U056_after_lei3.xml

Sample 5: Legal Entity Event – Event Group
- TEST00SOQMU4ZX8UK57_lei3.xml

Sample 6: Legal Entity Event – Withdrawn/Cancelled Event
- TEST00LHE1LDN4D7R37_step1_lei3.xml
- TEST00LHE1LDN4D7R37_step2_lei3.xml

Sample 7: Government Entity – Consolidated Central Government Entity
- 5493007BPZS3LU7J0U61_lei3.xml
- 5493007BPZS3LU7J0U61_rr2.xml

Sample 8: Government Entity – Non-Consolidated State Government Entity
- 529900P5TAD0ABFTMV10_lei3.xml
- 529900P5TAD0ABFTMV10_repex2.xml

Sample 9: Government Entity – Registered Local Government Entity
- 7245008LXZZHBNMOP06_lei3.xml
- 7245008LXZZHBNMOP06_repex2.xml

Sample 10: International Organization
- 549300HYGYJKXU2J8X74_lei3.xml
- 549300HYGYJKXU2J8X74_repex2.xml

Sample 11: New Reporting Exception Reason NON_PUBLIC
- TEST00AAC7FSN6913Y37_lei3.xml
- TEST00AAC7FSN6913Y37_repex2.xml
Sample 1: Fund Relationships – Umbrella Structure

AlbaCore Partners I Master Fund (635400OCWIKPSEDOHY65) is registered at the Central Bank of Ireland (CBI), a Registration Authority listed on the RA list (RA000404). Link to the entity: http://registers.centralbank.ie/FundRegisterDataPage.aspx?fundReferenceNumber=C163293&register=9.

The following information can be validated:

- Name of the Sub-Fund: AlbaCore Partners I Master Fund
- Registration Authority and Entity ID
- Legal Form: ICAV (ELF code 2GV9)
- Name of the Umbrella: AlbaCore Partners I ICAV
- Name of the Fund Manager (AIFM): AlbaCore Capital Limited
- Date of Approval (used for EntityCreationDate and also as StartDate for the RelationshipPeriod, but depending on the jurisdiction, that may not be the correct date when the entity became legally active)

The LegalAddress of the fund can be validated from the Instrument of Incorporation (IOI) of the umbrella filed at Central Bank of Ireland:
http://registers.centralbank.ie/ICAVDocuments/C156258/Instrument%20of%20Incorporation%20on%20Registration.pdf.

The sub-fund is not consolidated by an accounting standard, so two exceptions are reported for direct and ultimate parent.

The umbrella fund has two additional sub-funds both having an LEI (635400G9OA8AFLAKAL93 and 635400MJITHXFZKJRO41) and also registered at CBI. Hence, the entire umbrella structure can be reported (not part of the provided exemplary xml files).
AlbaCore Partners I Feeder ICAV (6354009BJOF062XYIX17) is registered at the Central Bank of Ireland (CBI), a Registration Authority listed on the RA list (RA000404). Link to the entity: http://registers.centralbank.ie/FundRegisterDataPage.aspx?fundReferenceNumber=C158455&register=50.

The following information can be validated:
- Name of the fund: AlbaCore Partners I Feeder ICAV
- Registration Authority and Entity ID
- Legal Form: ICAV (Elf code 2GV9)
- Name of the Fund Manager (AIFM): AlbaCore Capital Limited
- Date of Approval (used for EntityCreationDate and also as StartDate for the RelationshipPeriod, but depending on the jurisdiction, that may not be the correct date when the entity became legally active)

The LegalAddress of the fund and the Feeder/Master relationship are included in the Instrument of Incorporation (IOI) filed at Central Bank of Ireland: http://registers.centralbank.ie/ICAVDocuments/C158455/Instrument%20of%20Incorporation%20Updated%2016.10.27.pdf.

The IOI declares AlbaCore Partners I ICAV (the umbrella in the first sample) as Master ICAV. It may be that the feeder is not investing directly in the umbrella but in one (or more) of its sub-funds in which case the EndNode of the Master/Feeder relationship as well as the ValidationReference will be different.

The feeder fund is not consolidated by an accounting standard, so two exceptions are reported for direct and ultimate parent.
Sample 3: Legal Entity Event – Transition of a MERGED LEI

The sample describes the updates necessary for the transition of LEI Records having RegistrationStatus MERGED prior to the introduction of Legal Entity Events into the Global LEI System. For the sake of simplicity, parent information (Level 2 data) is not provided.

Before the update:
- RegistrationStatus is MERGED
- EntityStatus is INACTIVE
- EntityExpirationDate is provided
- EntityExpirationReason is CORPORATE_ACTION
- SuccessorEntity is provided

After the update:
- RegistrationStatus is changed to RETIRED
- EntityStatus is kept as INACTIVE
- EntityExpirationDate is removed
- EntityExpirationReason is removed
- Legal Entity Event is added:
  - @group_type is STANDALONE
  - @event_status is COMPLETED
  - LegalEntityEventType is MERGERS_AND_ACQUISITIONS
  - LegalEntityEventEffectiveDate is the former EntityExpirationDate
  - LegalEntityEventRecordedDate is the current timestamp
  - AffectedFields including the xpath to and value of SuccessorEntity
- SuccessorEntity is kept unchanged
- LastUpdateDate is the current timestamp

For this transition of already inactive records, it is not expected that the LEI Issuers investigate the exact event or chain of events that led to the merger; MERGERS_AND_ACQUISITIONS can be used as event type for all respective records.

After the implementation of the Legal Entity Event policy, a distinction between merger and absorption shall be made.
Sample 4: Legal Entity Event – Transition of a RETIRED LEI

The sample describes the updates necessary for LEI Records having RegistrationStatus RETIRED prior to the introduction of Legal Entity Events into the Global LEI System. For the sake of simplicity, parent information (Level 2 data) is not provided.

Before the update:
- RegistrationStatus is RETIRED
- EntityStatus is INACTIVE
- EntityExpirationDate is provided
- EntityExpirationReason is DISSOLVED

After the update:
- RegistrationStatus is kept as RETIRED
- EntityStatus is kept as INACTIVE
- EntityExpirationDate is removed
- EntityExpirationReason is removed
- Legal Entity Event is added:
  - @group_type is STANDALONE
  - @event_status is COMPLETED
  - LegalEntityEventType is DISSOLUTION
  - LegalEntityEventEffectiveDate is the former EntityExpirationDate
  - LegalEntityEventRecordedDate is the current timestamp
- LastUpdateDate is the current timestamp

For this transition of already inactive records, it is not expected that the LEI Issuers investigate the exact event or chain of events that led to the retirement; DISSOLUTION can be used as event type for all respective records.

After the implementation of the Legal Entity Event policy, a distinction between liquidation and dissolution shall be made, and applicable and confirmed events leading to the closure (e.g.: bankruptcy, insolvency) shall be included.
Sample 5: Legal Entity Event – Event Group

This sample shows a fictional Legal Entity recording a change in the legal form that also changes the entity’s legal name (see the second Use Case in section 4.13.5 in the State Transition and Validation Rules v2.2).

Before the update (not shown in sample):
- LegalName is “Fictional Company B Ltd.”
- LegalFormCode is “4XP8” (Company limited by guarantee)

After the update:
- LegalName changed to “Fictional Company B, LLC”
- PreviousLegalName added as “Fictional Company B Ltd.”
- LegalFormCode changed to “MPUG” (Limited liability company)
- LegalEntityEvent for change of LegalForm is added:
  - @group_type is CHANGE_LEGAL_FORM_AND_NAME
  - @event_status is COMPLETED
  - LegalEntityEventType is CHANGE_LEGAL_FORM
- LegalEntityEvent for change of LegalName is added:
  - @group_type is CHANGE_LEGAL_FORM_AND_NAME
  - @event_status is COMPLETED
  - LegalEntityEventType is CHANGE_LEGAL_NAME
- Both events have the same @group_id to link them
- Both events are recorded at the same time, so LegalEntityEventRecordedDate is the same
- Since both events became effective at the same time, LegalEntityEffectiveDate is also the same
- There is no logical sequence for the events in this group, so @group_sequence_no is not included
Sample 6: Legal Entity Event – Withdrawn/Cancelled Event

This sample shows a fictional Legal Entity recording a confirmed announcement of a merger that was later on cancelled or withdrawn (see section 4.13.8 in the State Transition and Validation Rules v2.2 for merger events).

Step 1: Merger Announcement:
- LegalEntityEvent is added:
  - @group_type is STANDALONE
  - @event_status is IN_PROGRESS
  - LegalEntityEventType is MERGERS_AND_ACQUISITIONS
  - LegalEntityEventEffectiveDate is a date in the future (expected date for the completion of the merger)
  - LegalEntityEventRecordedDate is the current timestamp
  - AffectedFields include the (expected) name of the SuccessorEntity and the xpath to that element
- RegistrationStatus remains ISSUED

The LEI Record would be published for some time in this state, until the cancellation of the merger is announced and confirmed. The LEI Issuer would then update the record by adding a second LegalEntityEvent at the end of the list of LegalEntityEvents.

Step 2: Cancellation of the Merger:
- The IN_PROGRESS event remains unchanged
- A new LegalEntityEvent is added:
  - @group_type is STANDALONE
  - @event_status is WITHDRAWN_CANCELLED
  - LegalEntityEventType is MERGERS_AND_ACQUISITIONS
  - LegalEntityEventEffectiveDate is omitted (the merger no longer has an effective date, after it is cancelled)
  - LegalEntityEventRecordedDate is the current timestamp
- RegistrationStatus remains ISSUED

Although both LegalEntityEvents are basically about the same event (same merger), they do not form an event group and hence are not linked by a group_id and do not have a group_sequence_no. The events are recorded as STANDALONE and the sequence is determined by the LegalEntityEventRecordedDates.
Sample 7: Government Entities – Consolidated Central Government Entity

The Canadian Air Transport Security Authority (CATSA) is a Crown corporation established on April 1, 2002, and fully funded by parliamentary appropriations\(^1\). CATSA is a non-profit institution controlled by a central government unit. It is consolidated by the Government of Canada (https://www.tpsgc-pwgsc.gc.ca/recgen/cpc-pac/2020/pdf/2020-vol1-eng.pdf, page 58).

The LEI Record would be updated with the following information:
- EntityCategory is RESIDENT_GOVERNMENT_ENTITY
- EntitySubCategory is CENTRAL_GOVERNMENT
- LegalForm is 8888 and OtherLegalForm is Crown Corporation
- EntityCreationDate is 2002-04-01T00:00:00-04:00

The Government of Canada does not have an LEI but would be the consolidating direct and ultimate parent of CATSA. For the purpose of this sample, it is assumed that there is an LEI published for the Government of Canada within the Global LEI Repository (GOVERNMENTOFCANADA35).

Two relationship records would be created for direct and ultimate parent, both with the following information:
- EndNodeID is GOVERNMENTOFCANADA35
- QualifierCategorie is GOVERNMENT_ACCOUNTING_STANDARD
- RelationshipPeriod StartDate is 2002-04-01T00:00:00-04:00
- AccountingPeriod is one year and ends 2020-03-31

\(^1\) https://www.catsa-acsta.gc.ca/en/about-us
Sample 8: Government Entities – Non-Consolidated State Government Entity

Land Hessen (State of Hessen) is a state in the Federal Republic of Germany (529900AQBND356YJLY83) and belongs to the State Government Subsector.

The LEI Record would be updated with the following information:

- EntityCategory is RESIDENT GOVERNMENT ENTITY
- EntitySubCategory is STATE GOVERNMENT
- EntityCreationDate is 1945-09-19T00:00:00+02:00

Land Hessen is not consolidated by the Central Government of Germany, nor does itself consolidate entities on the Local Government Sector, like the city of Frankfurt am Main (529900CAUI4SUXXNF998). All three entities in the different sub-categories hence would declare NO_KNOWN_PERSON exception for direct and ultimate parent.

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2 https://english.hessen.de/visitors/hessian-history/reconstruction-period-after-world-war-ii
Sample 9: Government Entities – Registered Local Government Entity

The city of Emmen, Netherlands, is a local government entity that is registered in the business register of The Netherlands Chamber of Commerce (RA000463).

The LEI Record would be updated with the following information:
- EntityCategory is RESIDENT_GOVERNMENT_ENTITY
- EntitySubCategory is LOCAL_GOVERNMENT

Similar to the sample from Germany, Gemeente Emmen is not consolidated by the State Government (Provincie Drenthe, 724500W4L1XMWT67W478) or the Central Government (De Staat der Nederlanden, 254900G14ALGVKORFN62). All three entities in the different subcategories hence would declare NO_KNOWN_PERSON exception for direct and ultimate parent.
Sample 10: International Organization

The United Nations (UN) is an intergovernmental organization established after World War II. The UN currently has 193 member states and 2 observer states.

The LEI Record would be updated with the following information:

- EntityCategory is INTERNATIONAL_ORGANIZATION
- EntityCreationDate is 1945-06-26T00:00:00-07:00
- LegalJurisdiction is UN
- LegalForm is 9999 and OtherLegalForm is Charter of the United Nations

The UN is not consolidated by any of the member states or other international organization and would report NO_KNOWN_PERSON exceptions for direct and ultimate parent.

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Sample 11: New Reporting Exception Reason NON_PUBLIC

This sample includes a fictional Legal Entity with a minimal entity data and an reporting exception xml file with the new reason NON_PUBLIC introduced in REPEX-CDF 2.1. The new reason consolidates the five allowed opt-out reasons CONSENT_NOT_OBTAINED, LEGAL_OBSTACLES, BINDING_LEGAL_COMMITMENTS, DETRIMENT_NOT_EXCLUDED and DISCLOSURE_DETHERIMENTAL.

The five opt-out reasons remain in REPEX-CDF version 2.1 for backwards compatibility but should be replaced by NON_PUBLIC with the implementation of this CDF version.