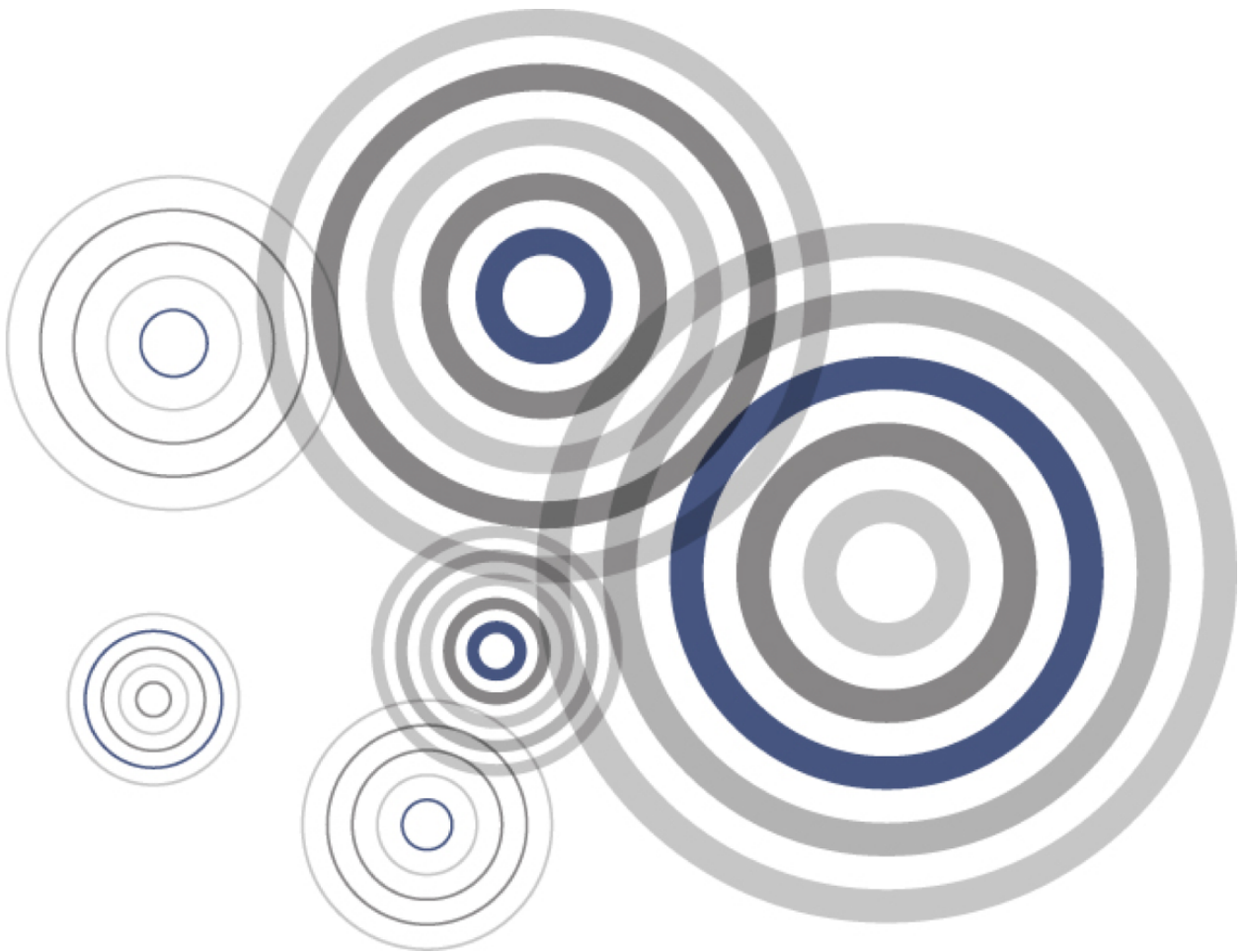


GLEIF – LOU Restricted

Parent Reference Data Format

FINAL V1.1 2016-10-21





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About this Document

This document describes a simplified format, similar to the LEI Common Data File format (LEI-CDF), for reporting reference data on parent entities which do not yet have an LEI, during the initial pilot phase of the Level 2 project.

Change History

Date	Version	Description of change	Author
2016-10-21	FINAL 1.1	Final version updated after LOU consultation	GLEIF
2016-08-26	FINAL 1.0	Final version for LOU consultation	GLEIF

1. Parent Reference Data Format Requirements

1.1. LEI-ROC Level 2 Proposal Requirements

The LEI-ROC published document¹ on level 2 LEI data provides the following (on page 18) for collecting data on parent entities without an LEI².

- As a pilot LOUs will collect, for parent [entities] that do not have an LEI, “parent metadata” as provided by the child [entity].
- The pilot is only a part of the “first phase” described in [the LEI-ROC] report.
- The pilot is to assess the ability to publish the data that will be collected on parents without an LEI (not the principle of collecting this data). Therefore, data on parents without an LEI will not be published in Phase 1.

The required set of “parent metadata” in the LEI-ROC proposal is:

- [Legal] Name.
- Legal address.
- Headquarters address.
- Business register information (if applicable):
 - Identification of the register.
 - Registry number for the parent entity.

All of the above data fields are mandatory for official LEI data records, except for business register information, which is mandatory where applicable for validated LEIs.

Apart from this minimum set, only a small number of data elements need to be made optional in order to adapt the LEI-CDF to the non-LEI parent metadata requirements:

- LEI (**replaced by PNI** for this purpose).
- EntityStatus (only currently active legal entities will be reported initially).
- Some Registration elements (except InitialRegistrationDate, RegistrationStatus and ManagingLOU – see below) which may be needed for basic data management.

LOUs are free to add further, optional data elements according to their internal requirements.

With these changes, the non-LEI parent metadata reflects the relaxed data requirements.

The PNI is purely internal to the system and not visible to the legal entity.

¹ “Collecting data on direct and ultimate parents of legal entities in the Global LEI System – Phase 1”, available at: http://www.lei-roc.org/publications/gls/lou_20161003-1.pdf

² The points above are taken as literally as possible from the text of the published report, shortened for reasons of space.

1.2. Data Management

- The XML schema namespace and any elements that contain the word “LEI” in their LEI-CDF equivalent, e.g. the element `pni:PNI` which replaces `lei:LEI`, are unique to the PNI XML schema.
- The Parent Reference Data format XML schema **allows** all fields allowed by the LEI-CDF Version 1.0 but **does not require** any more than the above selection.
- The Registration elements mentioned in the above section are mandatory:
 - `InitialRegistrationDate` contains the date stamp of the non-LEI parent data collection, for use in management and analysis of the non-LEI parent data.
 - `Registration Status` **must** be “PENDING_VALIDATION” to indicate that any PNI’s reference data is not LEI data, and is in a pre-validation state.
 - `ManagingLOU` **must** be provided to show which LOU collected this non-LEI parent data.

2. Example PNI Record

The randomly generated XML file below contains the minimum data elements required for a schema-valid PNI data record which also fulfills the requirements of the ISO 17442 standard with regard to reference data (ISO 17442 page 3).

Some fields which are optional (**allowed** but **not mandatory**) are shown for illustration as XML comments between the markup characters `<!--` and `-->` and highlighted in grey. These are **not** part of the data record, and would not be processed, in this example.

Please note:

The file below is provided for illustration only. It is not a content specification, only a demonstration that more data fields are optional for PNI codes than for LEIs. The data contents are not quality checked, even though the element structure is XML schema valid.

```
<?xml version="1.0" encoding="UTF-8"?>
<PNIData xmlns="http://www.gleif.org/data/schema/pni/2016"
  xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
  xsi:schemaLocation="http://www.gleif.org/data/schema/pni/2016 file:./please
  use your local schema location>/2016-07-12_non-lei-parent-data-file-
  format_v0-3_WORK.xsd">
  <PNIHeader>
    <ContentDate>2016-10-24T11:22:00Z</ContentDate>
    <Originator>B6N01TK9690J5GOFI093</Originator>
    <FileContent>LOU_FULL_INTERNAL</FileContent>
    <DeltaStart>2016-10-24T11:11:00Z</DeltaStart>
    <RecordCount>1</RecordCount>
  </PNIHeader>
  <PNIRecords>
    <PNIRecord>
      <PNI>D6AJZ8ZA00JQ5DT54312</PNI>
      <Entity>
        <LegalName xml:lang="en">Example Corporation</LegalName>
        <!-- <OtherEntityNames>
          <OtherEntityName type="AUTO_ASCII_TRANSLITERATED_LEGAL"
          xml:lang="en-AU">Exemple Societe </OtherEntityName>
          <OtherEntityName type="OTHER_LEGAL" xml:lang="">Exemple
          Société </OtherEntityName>
        </OtherEntityNames> -->
        <LegalAddress xml:lang="en">
```

```

        <Line1>1234 Legal Entity Lane</Line1>
        <Line2>Suite 4321</Line2>
        <City>Exampleville</City>
        <Region>US-MA</Region>
        <Country>US</Country>
        <PostalCode>02400</PostalCode>
    </LegalAddress>
    <HeadquartersAddress xml:lang="en">
        <Line1>One Large Office Building</Line1>
        <Line2>500th Floor</Line2>
        <Line3>Suite 444</Line3>
        <City>Côte d'Exemple</City>
        <Region>FR-D</Region>
        <Country>FR</Country>
        <PostalCode>12345</PostalCode>
    </HeadquartersAddress>
<!-- <lei:OtherAddresses>
    <lei:OtherAddress xml:lang="fr"
type="HEADQUARTERS_ADDRESS">
        <lei:Line1>Un Grand Immeuble de Bureaux</lei:Line1>
        <lei:Line2>500e étage</lei:Line2>
        <lei:Line3>Suite 444</lei:Line3>
        <lei:City>Côte d'Exemple</lei:City>
        <lei:Region>FR-D</lei:Region>
        <lei:Country>FR</lei:Country>
        <lei:PostalCode>lei:PostalCode</lei:PostalCode>
    </lei:OtherAddress>
</lei:OtherAddresses> -->
<BusinessRegisterEntityID register="BR-US-MA 2-
    718281828 </BusinessRegisterEntityID>
    <!-- <LegalJurisdiction>US-MA </LegalJurisdiction> -->
    <!-- <LegalForm xml:lang="en">C Corporation </LegalForm> -->
    <!-- <AssociatedEntity type="FUND_FAMILY">
<!-- <AssociatedEntityName xml:lang="">A. N. Other
Corp.</AssociatedEntityName>
    </AssociatedEntity> -->
    <!-- <EntityStatus>ACTIVE</EntityStatus> -->
</Entity>

```

```
<Registration>
  <InitialRegistrationDate>2015-08-
12T10:36:47Z</InitialRegistrationDate>
  <!-- <LastUpdateDate>2016-10-24T09:11:00Z</LastUpdateDate> --
>
  <RegistrationStatus>PENDING_VALIDATION</RegistrationStatus>
  <!-- <NextRenewalDate>2017-08-12T10:36:47Z </NextRenewalDate>
-->
  <ManagingLOU>B6N01TK9690J5GOFI093</ManagingLOU>
  <!--
<ValidationSources>PARTIALLY_CORROBORATED</ValidationSources> -->
</Registration>
</PNIRecord>
  </PNIRecords>
</PNIData>
```


3. Appendix: ISO 17442 LEI Reference Data Requirements

The table below presents the requirements for LEI reference data explicitly required by the ISO 17442:2012 standard. The exact text of the standard is reproduced in the column “ISO 17442:2102 Text”, broken down into grammatical units.

The occurrence suggested by the most literal reading of the ISO 17442:2012 text follows according to the notation:

- Mandatory (M).
- Where Applicable (WA).
- Optional (O).

The next two columns note the data fields in the LEI Common Data File format (LEI-CDF) that fulfill the ISO 17442:2012 requirements, together with their schema cardinalities in the fifth column.

The final column indicates which fields are required by the LEI-ROC level 2 proposal’s “parent metadata” (flagged “PM”).

#	Description	Occurrence	LEI-CDF equivalent	LEI-ROC Level 2 requirement
1	The official name of the legal entity as recorded in the business registry, or with the fund manager for collective investment vehicles, or otherwise in the entity’s constituting documents.	M	lei:LegalName	PM
2	Where applicable, the name of the business registry in which the entity was formed and	WA	lei:BusinessRegisterEntityID@register	PM
3	the identifier of the entity in the business registry should be recorded.	WA	lei:BusinessRegisterEntityID	PM

#	Description	Occurrence	LEI-CDF equivalent	LEI-ROC Level 2 requirement
4	The address of the headquarters of the legal entity or the address of the fund manager.	M	lei:HeadquartersAddress	PM
5	The address and the country of legal formation as represented in ISO 3166.	M	lei:LegalAddress/lei:Line1 lei:LegalAddress/lei:Country	PM
6	The date of the first LEI assignment.	M	lei:InitialRegistrationDate	
7	The date of last update of the LEI set of information.	M	lei>LastUpdateDate	
8	The date of expiry and	WA	lei:EntityExpirationDate	
9	reason for expiry, if applicable.	WA	lei:EntityExpirationReason	
10	For entities with a date of expiry, the reason for the expiry should be recorded and	WA	lei:EntityExpirationReason	
11	if applicable, the LEI of the entity or entities that acquired the expired entity.	WA	lei:SuccessorEntity/lei:SuccessorLEI	