

# Acquisition system for KIDs and structured information relating to packaged retail and insurance investment products ("PRIIPs")

## Technical specification for the acquisition of structured data in XML format

### 1. Changes History

Date	Version	Author	Comments
27/04/2021	0.1	CONSOB	First Draft
13/09/2021	0.2	CONSOB	Changes on percentage fields format. Added validation codes.
03/11/2021	0.3	CONSOB	Limitation of characters used for other product/option code. Correction of MOP file description.
02/02/2022	0.4	CONSOB	Changes on costs fields format. Compulsory requirements modification. Correction filename requirement.
23/05/2022	1.0	CONSOB	Change on costs structure range, Compulsory requirements details, details about mandatory information, other minor revisions.
24/10/2022	1.1	CONSOB	Transposition of amendments to Delegated Regulation 2017/653 <sup>1</sup> .

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<sup>1</sup> The changes will be available in the SFTP test environment (i.e. host trf.consob.it, port 2227) within the 31<sup>st</sup> of October 2022 and in the SFTP production environment (i.e. host trf.consob.it, port 2226) and Web Interface by the 1<sup>st</sup> of January 2023.

## 2. Document Scope

This document provides the technical specification concerning the XML flow of structured data relating to packaged retail investment and insurance-based products (**PRIIPs** - *Packaged Retail Investment and Insurance-Based Products*) as established by the new method of communication of key documents (**KID** - *Key Information Document*) relating to the PRIIPs marketed on the Italian territory [1] [2] [3].

## 3. Acronyms

Acronym	Description
<b>CFD</b>	Contracts For Difference
<b>CIS</b>	Collective Investment Scheme
<b>ETD</b>	Exchange Traded <u>D</u> erivatives
<b>ETP</b>	Exchange Traded Product
<b>EU</b>	European Union
<b>IBIP</b>	Insurance-Based Investment Product
<b>KID</b>	Key Information Document
<b>KIID</b>	Key Investor Information Document
<b>MIFID</b>	Markets in Financial Instruments Directive
<b>MOP</b>	Multi-Option Product
<b>OTC</b>	Over The Counter
<b>PDF</b>	Portable Document Format
<b>PRIIPs</b>	Packaged Retail Investment and Insurance-Based Products
<b>SFTP</b>	Secure File Transfer Protocol
<b>SID</b>	Specific Information Document
<b>UCITS</b>	Undertakings for the Collective Investment in Transferable Securities
<b>XML</b>	Extensible Markup Language
<b>XSD</b>	XML Schema Definition

## 4. Structured Information for PRIIPs

### 4.1. Information flows for PRIIPs

The structured information to be collected refers to the following information flows, one for each type of product, with the addition of a control flow to declare the closure of a product/option or the cancellation of what was previously sent (see [1]):

1. Non-IBIP PRIIPs that are not OTC derivatives nor ETDs with single KID (**single not-IBIP KID**);
2. OTC or ETD derivatives for which an aggregate KID has been prepared (**aggregate not-IBIP KID**);
3. IBIPs that do not provide for investment options (**not-MOP IBIP**);
4. IBIP which provide for investment options for which the KID is prepared in accordance with the provisions of art. 10a of delegated regulation n. 653 of 8 March 2017 (**IBIP MOP 10 a**);
5. IBIP which provide for investment options for which the generic KID is prepared in accordance with the provisions of art. 10b of delegated regulation n. 653 of 8 March 2017 and the KID or SID for the related investment options (**IBIP MOP 10 b – generic KID and options below**);
6. Closing of an investment product or option for which the preparation of the KID or SID is envisaged or cancellation of the last transmission (**CTRL**).

For seek of semantic homogeneity, the information useful for the supervision of PRIIPs products has been grouped within the following information sets (see 4.2 for detailed description):

- ✓ Information identifying attachments (*FileAttachment*);
- ✓ General information for the PRIIP (*GeneralPortfolio*);
- ✓ Narrative information for the PRIIP (*NarrativeDetails*, *NarrativeDetails\_Ks*, *NarrativeDetails\_Ka*);
- ✓ Risk assessment information for the PRIIP (*RiskAssessment*, *RiskAssessment\_Ext*, *RiskAssessment\_Pnl*, *RiskAssessment\_Ins*, *RiskAssessment\_IMbg*);
- ✓ Information on performance scenarios for the PRIIP (*PerformanceScenario*, *PerformanceScenario\_Ibip*);
- ✓ Information on the cost structure for the PRIIP (*CostStructure*);
- ✓ Specific information on MOP options for the PRIIP (*OptionDetails*);

In some cases, the information sets have been extended and specialized with respect to the specific product type to carry specific information within the information flows.

The main dependencies between the information flows and the information sets that compose them are illustrated in the diagrams below, while, the detail of the information contained within the information sets and their fungibility with respect to the flows is described in the following paragraphs.

We suppose that the XML file (see XSD schema in [4]) to be made available is one and only one for each product, even in presence of IBIP MOP types. In the latter cases, however, in order to have exhaustive information, some sets will be replicated both at product level (wrapper) and at underlying option level. In case of IBIP MOP 10b products, the flow is particularly articulated and aimed to host both the generic KID information (which does not include performance scenarios information set, while being equipped with a double cost structure in order to represent the range min-max) and the information relating to each of the underlying options.

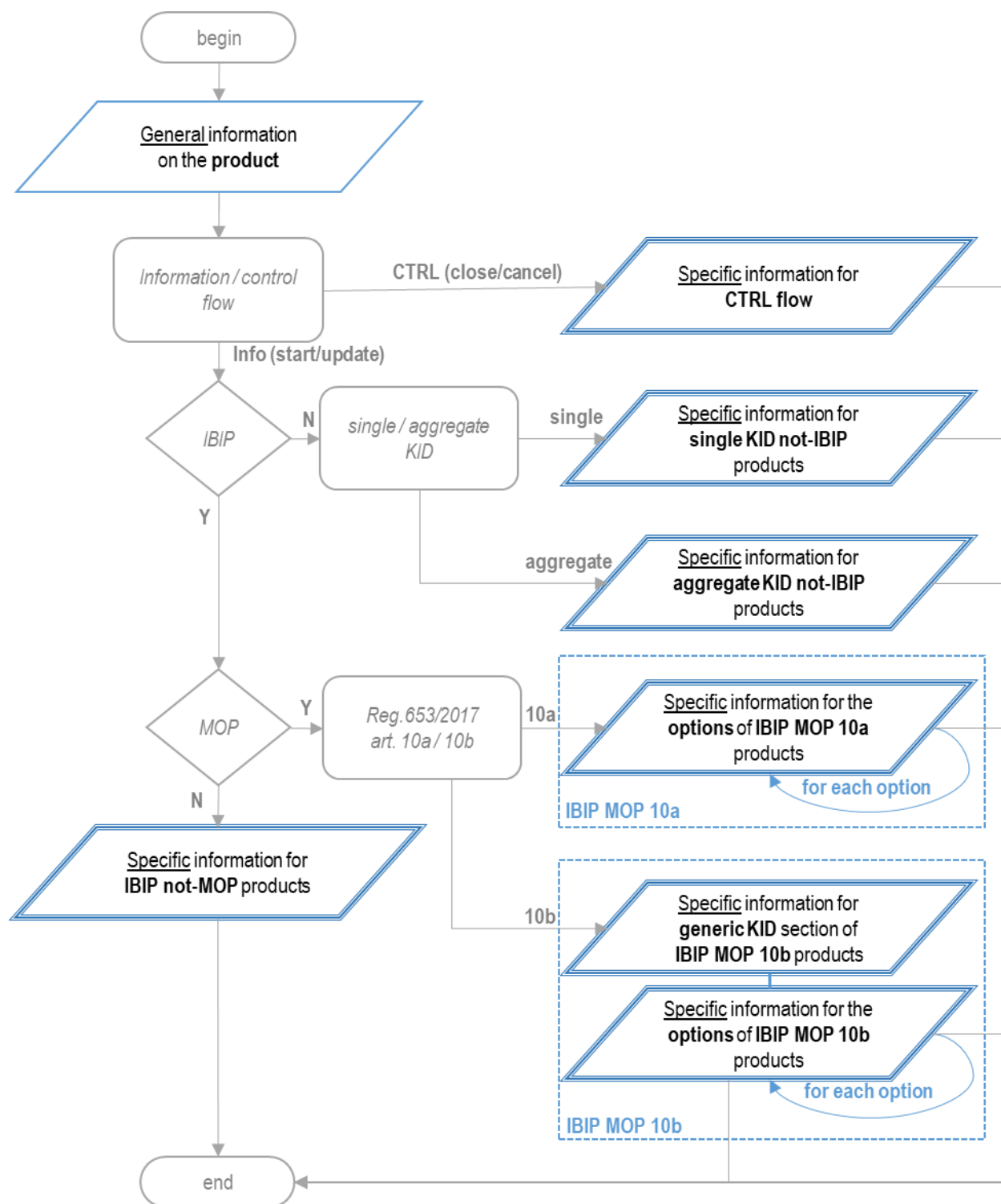


Figure 1 – Selection and structure of the information / control flow

As shown in Figure 1, an information or control data flow is made up of a set of general information on the product (i.e. *General Portfolio*), that is independent from the type of flow, and other information that is specific to the type of flow, represented by a conglomerate of information sets (as described below in 4.2) composed on the basis of the specific product.

Information carried by PRIIP notification data flow for supervisory purposes [PriipsData]		
NAME	DESCRIPTION	FORMAT
<b>GeneralPortfolioInfo</b>	General product information.	GeneralPortfolio
<b>SpecificPortfolioInfo</b>  (to be chosen on the basis of the type of product)	Single KID not-IBIP product specific information.	Not_Ibip_Single
	Aggregate KID not-IBIP product specific information.	Not_Ibip_Aggr
	IBIP not-MOP product specific information.	Ibip_Not_Mop
	IBIP MOP art. 10a product specific information.	Ibip_Mop_10a
	IBIP MOP art. 10b product specific information.	Ibip_Mop_10b
	Control flow specific information.	Close_Canc

Table 1 – Information carried by PRIIP notification data flow for supervisory purposes [PriipsData]

Specific information for single KID not-IBIP products [Not_Ibip_Single]		
NAME	DESCRIPTION	FORMAT
<b>NarrativeInfo</b>	Narrative product information.	NarrativeDetails_Ks
<b>RiskAssessmentInfo</b>	Information about the risk assessment of the product.	RiskAssessment_Pnl
<b>PerformanceScenarioInfo</b>	Information related to product performance scenarios.	PerformanceScenario
<b>CostStructureInfo</b>	Information about the cost structure of the product.	CostStructure_EUR
<b>KidFile</b>	PDF file related to the product KID.	FileAttachment (minOccurs=0)

Table 2 – Specific information for single KID not-IBIP products [Not\_Ibip\_Single]

Specific information for aggregate KID not-IBIP products [Not_Ibip_Aggr]		
NAME	DESCRIPTION	FORMAT
<b>NarrativeInfo</b>	Narrative product information.	NarrativeDetails_Ka
<b>RiskAssessmentInfo</b>	Information about the risk assessment of the product	RiskAssessment_Pnl
<b>PerformanceScenarioInfo</b>	Information related to product performance scenarios.	PerformanceScenario
<b>CostStructureInfo</b>	Information about the cost structure of the product.	CostStructure_EUR
<b>KidFile</b>	PDF file related to the product KID.	FileAttachment (minOccurs=0)

Table 3 – Specific information for aggregate KID not-IBIP products [Not\_Ibip\_Aggr]

Specific information for IBIP not-MOP products [Ibip_Not_Mop]		
NAME	DESCRIPTION	FORMAT
<b>NarrativeInfo</b>	Narrative product information.	NarrativeDetails
<b>RiskAssessmentInfo</b>	Information about the risk assessment of the product.	RiskAssessment_Ins
<b>PerformanceScenarioInfo</b>	Information related to product performance scenarios.	PerformanceScenarioIbip
<b>CostStructureInfo</b>	Information about the cost structure of the product.	CostStructure
<b>KidFile</b>	PDF file related to the product KID.	FileAttachment (minOccurs=0)

Table 4 – Specific information for IBIP not-MOP products [Ibip\_Not\_Mop]

For flows relating to IBIP MOP products, it was assumed that the information relating to the options must be reported within the same XML flow for each option contemplated by the product.

Specific information for IBIP MOP 10a products [Ibip_Mop_10a]		
NAME	DESCRIPTION	FORMAT
<b>MopFile</b>	File reference showing the individual product options linked to the product. For each option, including UCITS or funds other than UCITS referred to in Article 32 of Regulation (EU) 1286/2014, there must be reported the ISIN/other code, name, type (Segregated Fund, Internal Funds, External Funds, Other assets), the ideator/manager. The hybrid types are to be reported under "other assets".	FileAttachment
<b>MopOptionsList</b>	Sections dedicated to the specific information on the options of the information flow related to an IBIP MOP 10a product.	Mop_10a_Udr_Opt (multiple: minOccurs=1, maxOccurs=unbounded)

Table 5 – Specific information for IBIP MOP 10a products [Ibip\_Mop\_10a]

In particular, it was assumed that in the case of KID pursuant to art. 10a of EU Reg. 653/2017, the communicated options can theoretically be unlimited and at least 1 must be present within the information flow, otherwise there would be the case of total absence of specific information on the product.

Conversely, in the case of KID pursuant to art. 10b of EU Reg. 653/2017 it has been hypothesized that the options communicated may theoretically be unlimited but may also not be present at all, as in the case of update of the generic KID only.

Specific information for IBIP MOP 10b products [Ibip_Mop_10b]		
NAME	DESCRIPTION	FORMAT
<b>MopFile</b>	File reference showing the individual product options linked to the product. For each option, including UCITS or funds other than UCITS referred to in Article 32 of Regulation (EU) 1286/2014, there must be reported the ISIN/other code, name, type (Segregated Fund, Internal Funds, External Funds, Other assets), the manufacturer/manager. The hybrid types are to be reported under "other assets".	FileAttachment
<b>Mop10bGenKid</b>	Specific information for the section dedicated to the generic KID of the information flow relating to an IBIP MOP 10b product.	Mop_10b_Gen_Kid
<b>MopOptionsList</b>	Sections dedicated to the specific information on the options of the information flow related to an IBIP MOP 10b product.	Mop_10b_Udr_Opt (multiple: minOccurs=0, maxOccurs=unbounded)

Table 6 – Specific information for IBIP MOP 10b products [Ibip\_Mop\_10b]

Specific information for the IBIP MOP 10b generic KID section [Mop_10b_Gen_Kid]		
NAME	DESCRIPTION	FORMAT
<b>NarrativeInfo</b>	Narrative product information.	NarrativeDetails
<b>RiskAssessmentInfo</b>	Information about the risk assessment of the product.	RiskAssessment_IMbg
<b>MinCostStructureInfo</b>	Information about the min cost structure of the product.	CostStructure
<b>MaxCostStructureInfo</b>	Information about the max cost structure of the product.	CostStructure
<b>InsContrCostStructureInfo</b>	Information about the cost structure of the insurance contract.	CostStructure (minOccurs=0)
<b>KidFile</b>	PDF file related to the product generic KID.	FileAttachment

Table 7 – Specific information for the IBIP MOP 10b generic KID [Mop\_10b\_Gen\_Kid]

Specific information for the IBIP MOP 10a underlying option section [Mop_10a_Udr_Opt]		
NAME	DESCRIPTION	FORMAT
<b>NarrativeInfo</b>	Narrative option information.	NarrativeDetails
<b>RiskAssessmentInfo</b>	Information about the risk assessment of the option.	RiskAssessment_Ins
<b>PerformanceScenarioInfo</b>	Information related to option performance scenarios.	PerformanceScenarioIbip
<b>CostStructureInfo</b>	Information about the cost structure of the option.	CostStructure
<b>SpecificOptionInfo</b>	Specific identifying information about the option.	OptionDetails
<b>KidFile</b>	PDF file related to the option KID.	FileAttachment

Table 8 – Specific information for the IBIP MOP 10a underlying option [Mop\_10a\_Udr\_Opt]

Specific information for the IBIP MOP 10b underlying option section [Mop_10b_Udr_Opt]		
NAME	DESCRIPTION	FORMAT
<b>NarrativeInfo</b>	Narrative option information.	NarrativeDetails
<b>RiskAssessmentInfo</b>	Information about the risk assessment of the option.	RiskAssessment
<b>PerformanceScenarioInfo</b>	Information related to option performance scenarios.	PerformanceScenarioIbip
<b>CostStructureInfo</b>	Information about the cost structure of the option.	CostStructure_EUR
<b>SpecificOptionInfo</b>	Specific identifying information about the option.	OptionDetails
<b>KidFile</b>	PDF file related to the option KID.	FileAttachment

Table 9 – Specific information for the IBIP MOP 10b underlying option [Mop\_10b\_Udr\_Opt]

Specific information for product/option closure or for last transmission cancelation [Close_Canc]		
NAME	DESCRIPTION	FORMAT
<b>NotificationType</b>	Product closure [CLOSE product (X)] Options closure [CLOSE options (O)] Cancellation of the last transmitted data flow [CANCEL data flow (C)].	Enumeration X/O/C
<b>ClosureDate</b>	Early closing date for products with automatic refund mechanism (or any products with a pre-established maturity recalled in advance for any purpose) or end-of-marketing date for products without a pre-established maturity.	Data format ISO 8601 AAAA-MM-GG (minOccurs=0)
<b>SpecificOptionInfo</b>	Specific identifying information about the options to be closed. Optional list to be used only in the case of selective closure of some IBIP MOP options.	OptionDetails (multiple: minOccurs=0, maxOccurs=unbounded)

Table 10 – Control-flow specific information [Close\_Canc]

Even in the case of control-flow, used to communicate the closure of a product/option or the cancellation of the last transmission, the specific information will be added to the general information that identifies the product (i.e. *General Portfolio*) common to all flows. The specific information relating to the control-flow consists of the notification type (whole product closure, closure of some options, cancellation of the last update [1]), the early closing or end-of-marketing date of the product and the set of information identifying the investment options (i.e. *OptionDetails*) to be closed, to be filled in as specified in the operating instructions [1]. The presence of the

latter information set is optional, in fact, it is necessary in case of cancellation of the last data flow transmission. In the case of options closed on different dates, a communication must be sent for each closing date.

#### 4.2. PRIIPs information sets

A summary table has been reported for each information set containing, for each information unit: the name of the data, a brief description of the requirements, the format of the data and its fungibility for each information or control flow. The fungibility is considered in terms of mandatory (x), optional (o) or conditional (c) presence of the data within the information flows; in the latter case, any conditions upon the occurrence of which the presence is required are reported in the field description. On the other hand, whenever no presence mode is marked for the field, it is considered absent as it is not contemplated for the related data flow.

Requested data must be reported consistently with what is indicated in the KID to which they refer, except for the cases explicitly reported below (e.g. data subject to transcoding with respect to what is present in the KID).

To represent the references to the attached files, an ad-hoc structure has been prepared (see Table 11) which includes, in addition to the type of attachment (list of options, KID), also the file name (in capital letters and including the extension).

Attachments identification information [FileAttachment]			not IBIP sing. KID	not IBIP aggr. KID	IBIP not MOP	IBIP MOP 10a	IBIP MOP 10a gen. KID	IBIP MOP 10b undr. opt.	CTRL close/canc.
NAME	DESCRIPTION	FORMAT							
FileType	Tipo di allegato da selezionare tra quelle consentite dall'enumerazione.	Enumeration - options_list - KID	o	o	o	x	x	x	
FileName	Attachment file name, in capital letters, including the extension.	String 255 characters pattern regex: [A-Z0-9_#]{1,255}	o	o	o	x	x	x	

Table 11 - Information structure FileAttachment, relating to an attached file

The *GeneralPortfolio* information set, relating to general product information (see Table 12), collects the identification data common to all flows. It is always reported only once at the beginning of the XML file.

General product information [GeneralPortfolio]			not IBIP sing. KID	not IBIP aggr. KID	IBIP not MOP	IBIP MOP 10a	IBIP MOP 10b gen. KID	IBIP MOP 10b undr. opt.	CTRL close/canc.
NAME	DESCRIPTION	FORMAT							
LEI	Manufacturer LEI code.	String 20 characters - Pattern regex: [A-Z0-9]{18,18}[0-9]{2,2}	x	x	x	x	x	x	x
ManufacturerName	Name assigned to the PRIIP by the manufacturer, reported in the KID in accordance with the art. 1 letter b) of the DELEGATED REGULATION (EU) 2017/653.	String 255 characters	x	x	x	x	x	x	x
InstrumentName	Commercial name of the product in accordance with the art. 1 letter a) of the DELEGATED REGULATION (EU) 2017/653. In the case of IBIP MOP it is necessary to indicate the information relating to the wrapper (common to all investment options).	String 4000 characters (not standard descriptive type)	x	x	x	x	x	x	x
ISIN	ISIN code (ISO 6166) of the product, if available.	String 12 characters - Pattern regex: [A-Z]{2,2}[A-Z0-9]{9,9}[0-9]{1,1}	c	c	c	c	c	c	c
OtherCode	Manufacturer's internal code. As an alternative to the ISIN code whenever the latter is not available.	String 255 characters - Pattern regex: [A-Z0-9]{1,255}	c	c	c	c	c	c	c

Table 12 – GeneralPortfolio information set, relating to general product information

The *NarrativeDetails* information set (see Table 13) collects the specific narrative data of an investment product/option. It is present in all information flows and, in the case of MOPs, it is reported for each investment option. In order to cut out some typology details on not-IBIP products, the *NarrativeDetails* information set has

been extended and specialized into the *NarrativeDetails\_Ks* and *NarrativeDetails\_Ka* ones, respectively dedicated to single and aggregate KID not-IBIP products.

Narrative information about the product/option [NarrativeDetails]			not IBIP sing. KID	not IBIP aggr. KID	IBIP not MOP	IBIP MOP 10a	IBIP MOP 10b gen. KID	IBIP MOP 10b undr. opt.	CTRL close/canc.
NAME	DESCRIPTION	FORMAT							
<b>NotificationType</b>	First notification [START - (S)] / update [UPDATE - (U)].	Enumeration S/U	x	x	x	x	x	x	
<b>ReferenceDate</b>	Production date of the KID or, in case of subsequent revision, date of the last revision of the KID in accordance with the art. 1 letter e) of the DELEGATED REGULATION (EU) 2017/653.	Date format ISO 8601 AAAA-MM-GG	x	x	x	x	x	x	
<b>ComprehensionAlert</b>	Field in which it is specified whether there is a warning in the KID regarding comprehensibility in accordance with the art. 1 of the DELEGATED REGULATION (EU) 2017/653.	Boolean	x	x	x	x	x	x	
<b>InvestmentObjective</b>	Descriptive and non-standard type field. Specifically, the investment objectives are also reported in terms of underlyings and the relationships between the underlyings and the returns in accordance with the art. 2 par. 2 of the DELEGATED REGULATION (EU) 2017/653. It is sufficient to report the initial part of the description without including the tabular part.	String 4000 characters (not standard descriptive type)	x	x	x	x	x	x	
<b>TargetMarket</b>	Descriptive and non-standard type field. Specifically, the target customers to whom the product is addressed is reported in accordance with the art. 2 par. 3 of the DELEGATED REGULATION (EU) 2017/653. The field is optional.	String 4000 characters (not standard descriptive type)	o	o	o	o	o	o	

Table 13 - NarrativeDetails information set, relating to narrative information on the product/option

Narrative product/option information for single KID not-IBIP PRIIPs (includes all the fields of NarrativeDetails with the addition of the following to be selected by single choice in order to identify the type of product and its detail) [NarrativeDetails_Ks]			not IBIP sing. KID	not IBIP aggr. KID	IBIP not MOP	IBIP MOP 10a	IBIP MOP 10b gen. KID	IBIP MOP 10b undr. opt.	CTRL close/canc.
NAME	DESCRIPTION	FORMAT							
<b>Securities</b>	SECURITIES typology details. To be selected by choice with respect to the other types of detail.	Enumeration - STRUCTURED_SECURITIES - ETP - BONDS - WARRANTS <sup>2</sup>	c						
<b>Cis</b>	CIS typology details. To be selected by choice with respect to the other types of detail.	Enumeration - CIS	c						
<b>Derivatives</b>	DERIVATIVES typology details (include ETD and OTC with single KID). To be selected by choice with respect to the other types of detail.	Enumeration - SWAP - OPTION - FORWARD - FUTURE - CFD	c						
<b>StructuredDeposits</b>	STRUCTURED_DEPOSITS typology details. To be selected by choice with respect to the other types of detail.	Enumeration - STRUCTURED_DEPOSITS	c						

Table 14 – NarrativeDetails\_Ks information set, relating to narrative information for single KID not-IBIP PRIIPs

Narrative product/option information for aggregate KID not-IBIP PRIIPs (includes all the fields of NarrativeDetails with the addition of the following) [NarrativeDetails_Ka]			not IBIP sing. KID	not IBIP aggr. KID	IBIP not MOP	IBIP MOP 10a	IBIP MOP 10b gen. KID	IBIP MOP 10b undr. opt.	CTRL close/canc.
NAME	DESCRIPTION	FORMAT							
<b>DerivativesType</b>	DERIVATIVES typology details.	Enumeration - SWAP - OPTION - FORWARD - FUTURE - CFD	x						

Table 15 – NarrativeDetails\_Ka information set, relating to narrative information for aggregate KID not-IBIP PRIIPs

<sup>2</sup> Only for the purposes of the communication in question, WARRANTS do not include certificates and, in general, all products that do not allow the subsequent purchase of the underlying, regardless of the legal form of the product.



The *RiskAssessment* information set, relating to information on risk assessment, collects data common to all flows that are useful for assessing the risk associated with the investment product/option.

However, since the presence of other information provided for the risk assessment is heterogeneous with respect to the different flows, the *RiskAssessment* set has been extended and progressively specialized for each flow, in order to include only the specific fields associated with the product typology.

Specifically, it should be noted that, in the case of generic KID of IBIP MOP 10b products, the values assumed by the summary risk indicator (SRI) and by the recommended holding period (RHP), having to summarize the trend for all the plethora of underlying options, are reported in terms of range (min-max) rather than punctually for the single investment product/option. Furthermore, for seek of homogeneity, in the case of aggregate KID non-IBIP products, the SRI field is still reported, although it is considered to always be equal to 7.

In the case of MOPs, the set of information on risk assessment is reported for each investment option.

Information regarding the risk assessment of the product/option common to all information flows Structure suitable for conveying risk information for IBIP MOP 10b underlying options [RiskAssessment]			not IBIP sing. KID	not IBIP aggr. KID	IBIP not MOP	IBIP MOP 10a	IBIP MOP 10b gen. KID	IBIP MOP 10b undr. opt.	CTRL close/canc.
NAME	DESCRIPTION	FORMAT							
<b>MaturityDate</b>	Expiry date of the PRIIP, if any, in accordance with art. 2 par. 5 lett. a) of the DELEGATED REGULATION (EU) 2017/653. Not to be filled in if the product does not have a fixed expiry date or is whole life. In this case, fill in the "duration" field. Indicate the maximum deadline whenever product envisages more than one deadline (e.g. aggregate KID).	Date format ISO 8601 AAAA-MM-GG	c	c	c	c	c	c	
<b>Duration</b>	Duration (in whole years or fractions with three decimals, rounded to the upper third decimal place) of the PRIIP (alternatively to maturity date). In the case of the product has an indefinite duration or has a whole life, the field must be filled in with 999. If more durations are envisaged, indicate the maximum one (e.g. aggregate KID).	DECIMAL(6,3) [0, 999]	c	c	c	c	c	c	
<b>SRI</b>	Summary numerical risk indicator from 1 to 7 in line with art. 3 par. 2 lett. a) of the DELEGATED REGULATION (EU) 2017/653. If a range is provided, as for generic KID, enter the maximum value (see RiskAssessment_IMbg for min value). Fixed at 7 for aggregate non-IBIP KID.	Enumeration 1-7	x	x	x	x	x	x	
<b>LiquidityRisk</b>	Field relating to the liquidity of the product to be filled in consistently with section "Liquidity risk", part 4 of Annex II of DELEGATED REGULATION (EU) 2017/653. Specifically, it is necessary to indicate whether the product entails a particularly significant liquidity risk (M) as defined in art. 56 of the aforementioned annex, or is an illiquid product (I) as defined in art. 57 of the aforementioned annex, or it is a liquid product (L) as defined in art. 58 of the aforementioned annex.	Enumeration L,M,I	x	x	x	x	x	x	
<b>CapitalLoss</b>	Possibility to loss the whole initial investment to be chosen between: none/partial/total/higher than the capital. The information is reported in accordance with art. 3 par. 2 lett. f) DELEGATED REGULATION (EU) 2017/653.	Enumeration - none - partial - total - higher_than_capital	x	x	x	x	x	x	
<b>RHP</b>	Recommended holding period or minimum holding period required for the product (expressed in whole years or fractions with three decimals, rounded to the upper third decimal place) in accordance with art. 6 of the DELEGATED REGULATION (EU) 2017/653. Indication of the max level (or single level if there is no range, see RiskAssessment_IMbg for min level indication).	DECIMAL(6,3) [0, 999]	x	x	x	x	x	x	

Table 16 - *RiskAssessment* information set, relating to information on risk assessment common to all information flows

Information regarding risk assessment common to most information flows Extended structure suitable for all flows except for those relating to the IBIP MOP 10b underlying options (includes all the RiskAssessment fields with the addition of the following) [RiskAssessment_Ext]			not IBIP sing. KID	not IBIP aggr. KID	IBIP not MOP	IBIP MOP 10a	IBIP MOP 10b gen. KID	IBIP MOP 10b undr. opt.	CTRL close/canc.
NAME	DESCRIPTION	FORMAT							
<b>SolvencyGuarantee</b>	Presence of an investor compensation system or a guarantee system in case of insolvency for the manufacturer or the person other than the manufacturer of the PRIIPS in accordance with the Article 4 letter b) of the DELEGATED REGULATION (EU) 2017/653.	Boolean	0	0	0	0	0		
<b>GuaranteeName</b>	Name of the guarantee or indemnity system. To be filled in if "YES" has been indicated in the SolvencyGuarantee field.	String 300 characters	c	c	c	c	C		
<b>GuaranteeLimits</b>	Presence of limits in the investor compensation system or guarantee on the insolvency of the creator or of the person other than the creator of the PRIIPS in accordance with the provisions of Article 4 letter b) of the DELEGATED REGULATION (EU) 2017/653. To be filled in if "YES" has been indicated in the SolvencyGuarantee field.	Boolean	c	c	c	c	c		
<b>PenaltyClause</b>	Presence or not of commissions or penalties in case of early disinvestment, that are applied in case of disinvestment before maturity or before any other specified dates and different from the recommended holding period, in accordance with art. 6 lett. c) of the DELEGATED REGULATION (EU) 2017/653.	Boolean	x	x	x	x	x		

Table 17 - RiskAssessment\_Ext information set, relating to information on risk assessment common to most PRIIPs

Information regarding risk assessment for not-IBIP PRIIPs (single or aggregate KID) (includes all the fields of RiskAssessment_Ext with the addition of the following) [RiskAssessment_Pnl]			not IBIP sing. KID	not IBIP aggr. KID	IBIP not MOP	IBIP MOP 10a	IBIP MOP 10b gen.	IBIP MOP 10b undr.	CTRL close/canc.
NAME	DESCRIPTION	FORMAT							
<b>MayBeTerminatedEarly</b>	Early termination clause pursuant to art. 2 paragraph 5 of the Delegated Regulation 653/2017, indicating whether the product: 1) can be automatically reimbursed based on the financial structure of the product - Annex VI, point 76 c) (with automatic refund mechanism) of the Delegated Reg. 653/2017; 2) can be reimbursed at the discretion of the manufacturer/issuer in line with the financial structure of the product - art. 2 par. 5 let. b) of the Delegated Reg. 653/2017; 3) it can be reimbursed both automatically and at the discretion of the creator/issuer; 0) does not fall into the two previous cases, as it cannot be paid off early or it can be reimbursed only for extraordinary events.	Enumeration 0,1,2,3	x	x					

Table 18 - RiskAssessment\_Pnl information set, relating to information on risk assessment for non-IBIP PRIIPs

Information relating to risk assessment for IBIP PRIIPs (insurance premium including extension) Structure suitable for conveying risk information for PRIIPs IBIP not-MOP or IBIP MOP 10a (includes all the fields of RiskAssessment_Ext with the addition of the following) [RiskAssessment_Ins]			not IBIP sing. KID	not IBIP aggr. KID	IBIP not MOP	IBIP MOP 10a	IBIP MOP 10b gen. KID	IBIP MOP 10b undr. opt.	CTRL close/canc.
NAME	DESCRIPTION	FORMAT							
<b>BiometricRiskPremium</b>	Implicit premium included within the premium subscribed for the biometric risk component, in accordance with art. 2 par. 4 of the DELEGATED REGULATION (EU) 2017/653.	DECIMAL(6,5) [0,00000 – 1,00000] e.g. 12,345% -> 0,12345			0	0	0		
<b>PremiumType</b>	Indication of whether the premium is single (and possibly with additional premium), recurring or both.	Enumeration: - single - recurrent - single_and_or_recurrent			x	x	x		

Table 19 - RiskAssessment\_INS information set, relating to information on risk assessment for IBIP PRIIPs (insurance premium extension)

Information relating to risk management for generic KID IBIP MOP 10b PRIIPs (includes all the fields of RiskAssessment_Ins with the addition of the following) [RiskAssessment_IMbg]			not IBIP sing. KID	not IBIP aggr. KID	IBIP not MOP	IBIP MOP 10a	IBIP MOP 10b gen. KID	IBIP MOP 10b undr. opt.	CTRL close/canc.
NAME	DESCRIPTION	FORMAT							
<b>SRI_min</b>	Summary numerical risk indicator from 1 to 7 pursuant to art. 3 par. 2 lett. a) of the DELEGATED REGULATION (EU) 2017/653 - indication of the minimum level.	Enumeration 1-7					x		
<b>RHP_min</b>	Recommended holding period or minimum holding period required of the product (expressed in whole years or fractions with three decimals, rounded to the upper third decimal place) in accordance with the provisions of art. 6 of the DELEGATED REGULATION (EU) 2017/653. Minimum level indication. To be filled in if a range is provided.	DECIMAL(6,3) [0, 999]					0		

Table 20 - RiskAssessment\_IMbg information set, relating to information on risk assessment for generic KID IBIP MOP 10b PRIIPs

The *PerformanceScenario* information set, relating to information on performance scenarios (see Table 21), collects performance data in terms of simulated yield values in the event of unfavourable, moderate, favourable and stress scenarios (the latter with the exception of CIS products), at the end of the first year (step1), for the intermediate period (step2) and at the end of the RHP (step3, always unless they are *derivatives* or *warrants*).

Information relating to product/option performance scenarios [PerformanceScenario]			not IBIP sing. KID	not IBIP aggr. KID	IBIP not MOP	IBIP MOP 10a	IBIP MOP 10b gen.	IBIP MOP 10b undr.	CTRL close/canc.
NAME	DESCRIPTION	FORMAT							
<b>AvRetStep1_Stress</b>	Stress case performance scenario step 1 - return value reported in accordance with what is defined in annex IV of the DELEGATED REGULATION (EU) 2017/653. To be completed with reference to the end of the first year, if the scenario is present and if the stress scenario is foreseen. Not mandatory for CIS with category 1 defined in point 4(c) of Annex II of the DELEGATED REGULATION (EU) 2017/653. Not envisaged for PRIIPs for which, pursuant to paragraph 30 of the annex IV of DELEGATED REGULATION (EU) 2017/653, the performance scenarios are presented in the form of a payoff structure graph. If multiple values are expected, as in aggregate KID, enter the maximum value.	DECIMAL(7,5) [-99,99999 – 99,99999] e.g. 1234,567%->12,34567	0	0	0	0	0		
<b>AvRetStep1_Unfavourable</b>	Unfavourable case performance scenario step 1 - return value reported consistently with what is defined in annex IV of the DELEGATED REGULATION (EU) 2017/653. To be completed with reference to the end of the first year, if the scenario is present. Not envisaged for PRIIPs for which, pursuant to paragraph 30 of the annex IV of DELEGATED REGULATION (EU) 2017/653, the performance scenarios are presented in the form of a payoff structure graph. If multiple values are expected, as in aggregate KID, enter the maximum value.	DECIMAL(7,5) [-99,99999 – 99,99999] e.g. 1234,567%->12,34567	0	0	0	0	0		
<b>AvRetStep1_Moderate</b>	Moderate case performance scenario step 1 - return value reported in accordance with what is defined in annex IV of the DELEGATED REGULATION (EU) 2017/653. To be completed with reference to the end of the first year, if the scenario is present. Not envisaged for PRIIPs for which, pursuant to paragraph 30 of the annex IV of DELEGATED REGULATION (EU) 2017/653, the performance scenarios are presented in the form of a payoff structure graph. If multiple values are expected, as in aggregate KID, enter the maximum value.	DECIMAL(7,5) [-99,99999 – 99,99999] e.g. 1234,567%->12,34567	0	0	0	0	0		
<b>AvRetStep1_Favourable</b>	Favourable case performance scenario step 1 - return value reported in accordance with what is defined in annex IV of the DELEGATED REGULATION (EU) 2017/653. To be completed with reference to the end of the first year, if the scenario is present. Not envisaged for PRIIPs for which, pursuant to paragraph 30 of the annex IV of DELEGATED REGULATION (EU) 2017/653, the performance scenarios are presented in the form of a payoff structure graph. If multiple values are expected, as in aggregate KID, enter the maximum value.	DECIMAL(7,5) [-99,99999 – 99,99999] e.g. 1234,567%->12,34567	0	0	0	0	0		
<b>AvRetStep2_Stress</b>	Stress case performance scenario step 2 - return value reported in accordance with what is defined in annex IV of the DELEGATED REGULATION (EU) 2017/653. To be completed with reference to the end of the intermediate period, if the scenario is present and if the stress scenario is mandatory. Not mandatory for CIS with category 1 defined in point 4(c) of Annex II of the DELEGATED REGULATION (EU) 2017/653. Not envisaged for PRIIPs for which, pursuant to paragraph 30 of the annex IV of DELEGATED REGULATION (EU) 2017/653, the performance scenarios are presented in the form of a payoff structure graph. If multiple values are expected, as in aggregate KID, enter the maximum value. Not envisaged for products with minimum holding period lesser than 10 years.	DECIMAL(7,5) [-99,99999 – 99,99999] e.g. 1234,567%->12,34567	0	0	0	0	0		
<b>AvRetStep2_Unfavourable</b>	Unfavourable case performance scenario step 2 - return value reported consistently with what is defined in annex IV of the DELEGATED REGULATION (EU) 2017/653. To be completed with reference to the end of the intermediate period, if the scenario is present. Not envisaged for PRIIPs for which, pursuant to paragraph 30 of the annex IV of DELEGATED REGULATION (EU) 2017/653, the performance scenarios are presented in the form of a payoff structure graph. If multiple values are expected, as in aggregate KID, enter the maximum value. Not envisaged for products with minimum holding period lesser than 10 years.	DECIMAL(7,5) [-99,99999 – 99,99999] e.g. 1234,567%->12,34567	0	0	0	0	0		
<b>AvRetStep2_Moderate</b>	Moderate case performance scenario step 2 - return value reported in accordance with what is defined in annex IV of the DELEGATED REGULATION (EU) 2017/653. To be completed with reference to the end of the intermediate period, if the scenario is present. Not envisaged for PRIIPs for which, pursuant to paragraph 30 of the annex IV of DELEGATED REGULATION (EU) 2017/653, the performance scenarios are presented in the form of a payoff structure graph. If multiple values are expected, as in aggregate KID, enter the maximum value. Not envisaged for products with minimum holding period lesser than 10 years.	DECIMAL(7,5) [-99,99999 – 99,99999] e.g. 1234,567%->12,34567	0	0	0	0	0		

<b>AvRetStep2_Favourable</b>	Favourable case performance scenario step 2 - return value reported in accordance with what is defined in annex IV of the DELEGATED REGULATION (EU) 2017/653. To be completed with reference to the end of the intermediate period, if the scenario is present. Not envisaged for PRIIPs for which, pursuant to paragraph 30 of the annex IV of DELEGATED REGULATION (EU) 2017/653, the performance scenarios are presented in the form of a payoff structure graph. If multiple values are expected, as in aggregate KID, enter the maximum value. Not envisaged for products with minimum holding period lesser than 10 years.	DECIMAL(7,5) [-99,99999 – 99,99999] e.g. 1234,567%->12,34567	o	o	o	o	o	
<b>AvRetStep3_Stress</b>	Stress case performance scenario step 3 - return value reported in accordance with what is defined in annex IV of the DELEGATED REGULATION (EU) 2017/653 with reference to the recommended holding period or the first call date for the products with automatic refund mechanism of the Annex VI, point 76 c of the Delegated Reg. 653/2017. To be filled in if the stress scenario is foreseen. Not mandatory for CIS with category 1 defined in point 4(c) of Annex II of the DELEGATED REGULATION (EU) 2017/653. Not envisaged for PRIIPs for which, pursuant to paragraph 30 of the annex IV of DELEGATED REGULATION (EU) 2017/653, the performance scenarios are presented in the form of a payoff structure graph. If multiple values are expected, as in aggregate KID, enter the maximum value.	DECIMAL(7,5) [-99,99999 – 99,99999] e.g. 1234,567%->12,34567	c	c	c	c	c	
<b>AvRetStep3_Unfavourable</b>	Unfavourable case performance scenario step 3 - return value reported consistently with what is defined in annex IV of the DELEGATED REGULATION (EU) 2017/653 with reference to the recommended holding period or the first call date for the products with automatic refund mechanism of the Annex VI, point 76 c of the Delegated Reg. 653/2017. Not envisaged for PRIIPs for which, pursuant to paragraph 30 of the annex IV of DELEGATED REGULATION (EU) 2017/653, the performance scenarios are presented in the form of a payoff structure graph. If multiple values are expected, as in aggregate KID, enter the maximum value.	DECIMAL(7,5) [-99,99999 – 99,99999] e.g. 1234,567%->12,34567	c	c	c	c	c	
<b>AvRetStep3_Moderate</b>	Moderate case performance scenario step 3 - return value reported in line with what is defined in annex IV of the DELEGATED REGULATION (EU) 2017/653 with reference to the recommended holding period or the first call date for the products with automatic refund mechanism of the Annex VI, point 76 c of the Delegated Reg. 653/2017. Not envisaged for PRIIPs for which, pursuant to paragraph 30 of the annex IV of DELEGATED REGULATION (EU) 2017/653, the performance scenarios are presented in the form of a payoff structure graph. If multiple values are expected, as in aggregate KID, enter the maximum value.	DECIMAL(7,5) [-99,99999 – 99,99999] e.g. 1234,567%->12,34567	c	c	c	c	c	
<b>AvRetStep3_Favourable</b>	Favourable case performance scenario step 3 - return value reported in accordance with what is defined in annex IV of the DELEGATED REGULATION (EU) 2017/653 with reference to the recommended holding period or the first call date for the products with automatic refund mechanism of the Annex VI, point 76 c of the Delegated Reg. 653/2017. Not envisaged for PRIIPs for which, pursuant to paragraph 30 of the annex IV of DELEGATED REGULATION (EU) 2017/653, the performance scenarios are presented in the form of a payoff structure graph. If multiple values are expected, as in aggregate KID, enter the maximum value.	DECIMAL(7,5) [-99,99999 – 99,99999] e.g. 1234,567%->12,34567	c	c	c	c	c	

Table 21 - PerformanceScenario information set, relating to information on performance scenarios

In order to acquire the reimbursement value for the insured event scenario, to be exclusively specified for IBIP products, the *PerformanceScenario* information set has been extended into the *PerformanceScenario\_Ibip* one, in order to include 3 additional fields dedicated to host the reimbursement value for the 3 steps above.

Information related to performance scenarios for IBIP products/options. (includes all fields of PerformanceScenario with the addition of the following) [PerformanceScenario_Ibip]			not IBIP sing. KID	not IBIP aggr. KID	IBIP not MOP	IBIP MOP 10a	IBIP MOP 10b gen. KID	IBIP MOP 10b undr. opt.	CTRL close/canc.
NAME	DESCRIPTION	FORMAT							
RmptValStep1_InsuredEvent	Insured event performance scenario step 1 - eg. reimbursement value in case of death - as required by art. 3 par. 4 of the DELEGATED REGULATION (EU) 2017/653. To be completed if step 1 is included within scenarios.	DECIMAL(12,2) [0,10 <sup>10</sup> -1]			o	o		O	
RmptValStep2_InsuredEvent	Insured event performance scenario step 2 - eg. reimbursement value in case of death - as required by art. 3 par. 4 of the DELEGATED REGULATION (EU) 2017/653. To be completed if step 2 is included within scenarios. Not envisaged for products with minimum holding period lesser than 10 years.	DECIMAL(12,2) [0,10 <sup>10</sup> -1]			o	o		O	
RmptValStep3_InsuredEvent	Insured event performance scenario step 3 - eg. reimbursement value in case of death - as provided for by art. 3 par. 4 of the DELEGATED REGULATION (EU) 2017/653.	DECIMAL(12,2) [0,10 <sup>10</sup> -1]			o	o		O	

Table 22 - PerformanceScenario\_Ibip information set, relating to information on performance scenarios for IBIP products/options

Since the information on the performance scenarios is specific for the individual product/option, the section dedicated to generic KID art. 10b does not include such an information set, instead there is one for each option contemplated both in the case of art. 10a and 10b within the relevant section.

The CostStructure information set, relating to information on the cost structure (see Table 23), collects data about the costs associated with the investment product/options.

Information about the cost structure of the product/option [CostStructure]			nd IBIP sing. KID	nd IBIP agr. KID	IBIP not MOP	IBIP MOP 10a	IBIP MOP 10b gen. KID	IBIP MOP 10b undr. opt.	CTRL - dose/canc.
NAME	DESCRIPTION	FORMAT							
EntryCost	Entry costs as a percentage reported in accordance with art. 5 par. 3 let a) of the DELEGATED REGULATION (EU) 2017/653. To be filled in if the cost item is present. If multiple values are expected, as in aggregate KID, enter the maximum value. Field envisaged only for IBIP.	DECIMAL(7,5) [-10,00000 – 10,00000] e.g. 12,345% -> 0,12345	0	0	0	0	0	0	
ExitCostAtRHP	Exit costs as a percentage reported in accordance with art. 5 par. 3 let a) of the DELEGATED REGULATION (EU) 2017/653. To be reported if the cost item is present. If multiple values are expected, as in aggregate KID, enter the maximum value. Field envisaged only for IBIP.	DECIMAL(7,5) [-10,00000 – 10,00000] e.g. 12,345% -> 0,12345	0	0	0	0	0	0	
TransactionCost	Portfolio transaction costs as a percentage reported in accordance with art. 5 par. 3 let b) of the DELEGATED REGULATION (EU) 2017/653. To be reported if the cost item is present. If multiple values are expected, as in aggregate KID, enter the maximum value. Field envisaged only for IBIP.	DECIMAL(7,5) [-10,00000 – 10,00000] e.g. 12,345% -> 0,12345	0	0	0	0	0	0	
OtherCost	Management fees and other administrative or operating costs as a percentage reported in accordance with art. 5 par. 3 let b) of the DELEGATED REGULATION (EU) 2017/653. To be reported if the cost item is present. If multiple values are expected, as in aggregate KID, enter the maximum value. Field envisaged only for IBIP.	DECIMAL(7,5) [-10,00000 – 10,00000] e.g. 12,345% -> 0,12345	0	0	0	0	0	0	
PerformanceFees	Performance fees and carried interests as a percentage reported in accordance with the provisions of art. 5 par. 3 let c) of the DELEGATED REGULATION (EU) 2017/653. To be reported if the cost item is present. If multiple values are expected, as in aggregate KID, enter the maximum value. Field envisaged only for IBIP.	DECIMAL(7,5) [-10,00000 – 10,00000] e.g. 12,345% -> 0,12345	0	0	0	0	0	0	
CarriedInterest	Percentage over-performance fees reported in accordance with art. 5 par. 3 let c) of the DELEGATED REGULATION (EU) 2017/653. To be reported if the cost item is present. If multiple values are expected, as in aggregate KID, enter the maximum value. Field kept for backward compatibility.	DECIMAL(7,5) [-10,00000 – 10,00000] e.g. 12,345% -> 0,12345	0	0	0	0	0	0	
TotalCost_Step1	Total costs referred to the investment hypothesis - step 1 reported in accordance with the provisions of annex VI of the DELEGATED REGULATION (EU) 2017/653. To be completed if step 1 is present in the scenarios, with reference to the end of the first year, for products that provide for an automatic refund mechanism referred to in Annex VI, point 76 c of DELEGATED REGULATION (EU) 2017/653 it means the earliest possible date on which the product is recalled. If multiple values are expected, as in aggregate KID, enter the maximum value.	DECIMAL(12,2) [1-10 <sup>10</sup> ,10 <sup>-1</sup> ]	0	0	0	0	0	0	
TotalCost_Step2	Total costs referred to the investment hypothesis - step 2 reported in accordance with the provisions of annex VI of the DELEGATED REGULATION (EU) 2017/653. To be completed if step 2 is present in the scenarios, with reference to the intermediate period. If multiple values are expected, as in aggregate KID, enter the maximum value. Not envisaged for products with minimum holding period lesser than 10 years.	DECIMAL(12,2) [1-10 <sup>10</sup> ,10 <sup>-1</sup> ]	0	0	0	0	0	0	
TotalCost_Step3	Total costs referred to the investment hypothesis - step 3 reported in accordance with the provisions of annex VI of the DELEGATED REGULATION (EU) 2017/653, with reference to the recommended holding period, for products that provide for an automatic reimbursement mechanism referred to in Annex VI, point 76 c of the DELEGATED REGULATION (EU) 2017/653 it means the first date on which the product reaches the expiry date. If multiple values are expected, as in aggregate KID, enter the maximum value.	DECIMAL(12,2) [1-10 <sup>10</sup> ,10 <sup>-1</sup> ]	x	x	x	x	0	x	
TotalCost_Currency	Currency of denomination of the total costs reported in the previous fields (ISO 4217).	String 3 caratteri – Pattern regex: [A-Z]{3}	x	x	x	x	c	x	
RIY_Step1	Reduction in yield (RIY) per year - in percentage - time step 1 reported in line with the provisions of Annex VI of the DELEGATED REGULATION (EU) 2017/653. To be completed if step 1 is present in the scenario, with reference to the end of the first year, for products that provide for an automatic refund mechanism referred to in Annex VI, point 76 c of DELEGATED REGULATION (EU) 2017/653 it means the earliest possible date on which the product is recalled. If multiple values are expected, as in aggregate KID, enter the maximum value.	DECIMAL(7,5) [-99,99999 – 99,99999] e.g. 1234,567% -> 12,34567	0	0	0	0	0	0	
RIY_Step2	Reduction in yield (RIY) per year - in percentage - time step 2 reported in line with the provisions of Annex VI of the DELEGATED REGULATION (EU) 2017/653. To be completed if step 2 is present in the scenarios, with reference to the intermediate period. If multiple values are expected, as in aggregate KID, enter the maximum value. Not envisaged for products with minimum holding period lesser than 10 years.	DECIMAL(7,5) [-99,99999 – 99,99999] e.g. 1234,567% -> 12,34567	0	0	0	0	0	0	
RIY_Step3	Reduction in yield (RIY) per year - in percentage - time step 3 reported in line with the provisions of Annex VI of the DELEGATED REGULATION (EU) 2017/653, with reference to the recommended holding period, for products that provide for an automatic reimbursement mechanism referred to in Annex VI, point 76 c of the DELEGATED REGULATION (EU) 2017/653 it means the first date on which the product reaches the expiry date. If multiple values are expected, as in aggregate KID, enter the maximum value.	DECIMAL(7,5) [-99,99999 – 99,99999] e.g. 1234,567% -> 12,34567	x	x	x	x	0	x	

Table 23 - CostStructure information set, relating to information on the cost structure



In the case of IBIP MOPs art. 10b generic KID, the above set of cost information is reported 3 times (see Table 7) in order to represent, respectively, the range min-max of the relevant costs associated with the whole set of underlying options<sup>3</sup> and the insurance contract costs associated with the wrapper<sup>4</sup> (to be represented with the same currency).

On the other hand, the sections dedicated to host specific information on the investment options report the cost structure information set once for each contemplated option.

Finally, for single PRIIPs and IBIP MOP 10b options, the cost structure information includes the following items in EUR.

Information about the cost structure in EUR for single PRIIPs and IBIP MOP 10b options (includes all fields of CostStructure with the addition of the following) [CostStructure_EUR]			not IBIP sing. KID	not IBIP aggr. KID	IBIP not MOP	IBIP MOP 10a	IBIP MOP 10b gen. KID	IBIP MOP 10b undr. opt.	CTRL close/canc.
NAME	DESCRIPTION	FORMAT							
<b>EntryCostEUR</b>	Entry costs in Eur reported in accordance with art. 5 par. 3 let a) of the DELEGATED REGULATION (EU) 2017/653. To be filled in if the cost item is present. If multiple values are expected, as in aggregate KID, enter the maximum value.	DECIMAL(12,2) [1-10 <sup>10</sup> ,10 <sup>10</sup> .1]	o	o			o		
<b>ExitCostAtRHPEUR</b>	Exit costs in Eur reported in accordance with art. 5 par. 3 let a) of the DELEGATED REGULATION (EU) 2017/653. To be reported if the cost item is present. If multiple values are expected, as in aggregate KID, enter the maximum value.	DECIMAL(12,2) [1-10 <sup>10</sup> ,10 <sup>10</sup> .1]	o	o			o		
<b>TransactionCostEUR</b>	Portfolio transaction costs in Eur reported in accordance with art. 5 par. 3 let b) of the DELEGATED REGULATION (EU) 2017/653. To be reported if the cost item is present. If multiple values are expected, as in aggregate KID, enter the maximum value.	DECIMAL(12,2) [1-10 <sup>10</sup> ,10 <sup>10</sup> .1]	o	o			o		
<b>OtherCostEUR</b>	Management fees and other administrative or operating costs in Eur reported in accordance with art. 5 par. 3 let b) of the DELEGATED REGULATION (EU) 2017/653. To be reported if the cost item is present. If multiple values are expected, as in aggregate KID, enter the maximum value.	DECIMAL(12,2) [1-10 <sup>10</sup> ,10 <sup>10</sup> .1]	o	o			o		
<b>PerfFeesCrdIntEUR</b>	Performance fees and carried interests in Eur reported in accordance with the provisions of art. 5 par. 3 let c) of the DELEGATED REGULATION (EU) 2017/653. To be reported if the cost item is present. If multiple values are expected, as in aggregate KID, enter the maximum value.	DECIMAL(12,2) [1-10 <sup>10</sup> ,10 <sup>10</sup> .1]	o	o			o		

Table 24 - CostStructure information set, relating to information on the cost structure in EUR

Although optional (i.e. marked with "o") due to the heterogeneous structure of the products, the information relating to costs must be represented in accordance with what is reported in the KID.

<sup>3</sup> Among all the underlying options, if the conditions set out in art. 13 let. b of the DELEGATED REGULATION (EU) 2017/653, otherwise referred to the product as a whole.

<sup>4</sup> To be reported if the cost item is present and if the conditions set out in art. 13 let. b of the DELEGATED REGULATION (EU) 2017/653.

The *OptionDetails* information set reports specific information relating to a single option contemplated by an IBIP MOP. It is reported for each option, within the dedicated sections of the information flows associated with the IBIP MOP products, both 10a and 10b, and within the control flow in order to identify the options to be closed.

Specific Information about the underlying option [OptionDetails]			not IBIP sing. KID	not IBIP aggr. KID	IBIP not MOP	IBIP MOP 10a	IBIP MOP 10b gen. KID	IBIP MOP 10b undr. opt.	CTRL close/canc.
NAME	DESCRIPTION	FORMAT							
<b>OptionName</b>	Name assigned by the manufacturer to the single option in accordance with art. 1 letter a) of the DELEGATED REGULATION (EU) 2017/653. It is necessary to indicate the specific information of the single investment option, as reported in the KID.	String 4000 characters (not standard descriptive type)			x		x	x	
<b>ISIN</b>	The ISIN code (ISO 6166) of the option, if available.	String 12 characters Pattern regex: [A-Z]{2,2}[A-Z0-9]{9,9}[0-9]{1,1}			c		c	c	
<b>OtherCode</b>	Manufacturer's internal code. As an alternative to the ISIN code whenever the latter is not available. It is necessary to indicate the specific information of the single investment option.	String 255 characters - Pattern regex: [A-Z0-9]{1,255}			c		c	c	
<b>OptionType</b>	Field to be filled in indicating whether the option to which the KID refers is a segregated fund, an internal fund, an external fund or another asset. The hybrid types are to be reported under "other assets".	Enumeration - segregated_fund - internal_funds - external_funds - other_assets			x		x	x	

Table 25 - *OptionDetails* information set, relating to specific information about the MOP option



## 5. Validation rules and feedback files

As described in operating instructions [1], the automated acquisition by CONSOB of notifications relating to the PRIIPs products involves the uploading by the manufacturer, within his own reserved area of the SFTP<sup>5</sup> server made available by CONSOB, of a compressed "zip" archive file for each product, containing:

- the product KID document in PDF format (more than one in case of MOPs);
- the XML file containing structured data about the product (unique even in the case of MOPs);
- any additional attached files.

Following each communication, CONSOB affixes the receipt timestamp to the "zip" archive file, extracts the information contained in the archive, validates it (i.e. XML validation with respect to the XSD schema with the addition of accessibility, completeness and consistency assertions) and upload it in dedicated archives of the Authority with reference to the relevant version and the timestamp of receipt.

The processing of notifications by CONSOB takes place in asynchronous batch mode, producing an outcome report (so-called Feedback File) that the manufacturer must take and consult to ensure that the notification has been successful. The feedback file produced is an XML file (see XSD schema in [5]), compressed within a "zip" archive, containing the result of the processing, either in the case it was successful or not; in the latter case the notification cannot be considered valid.

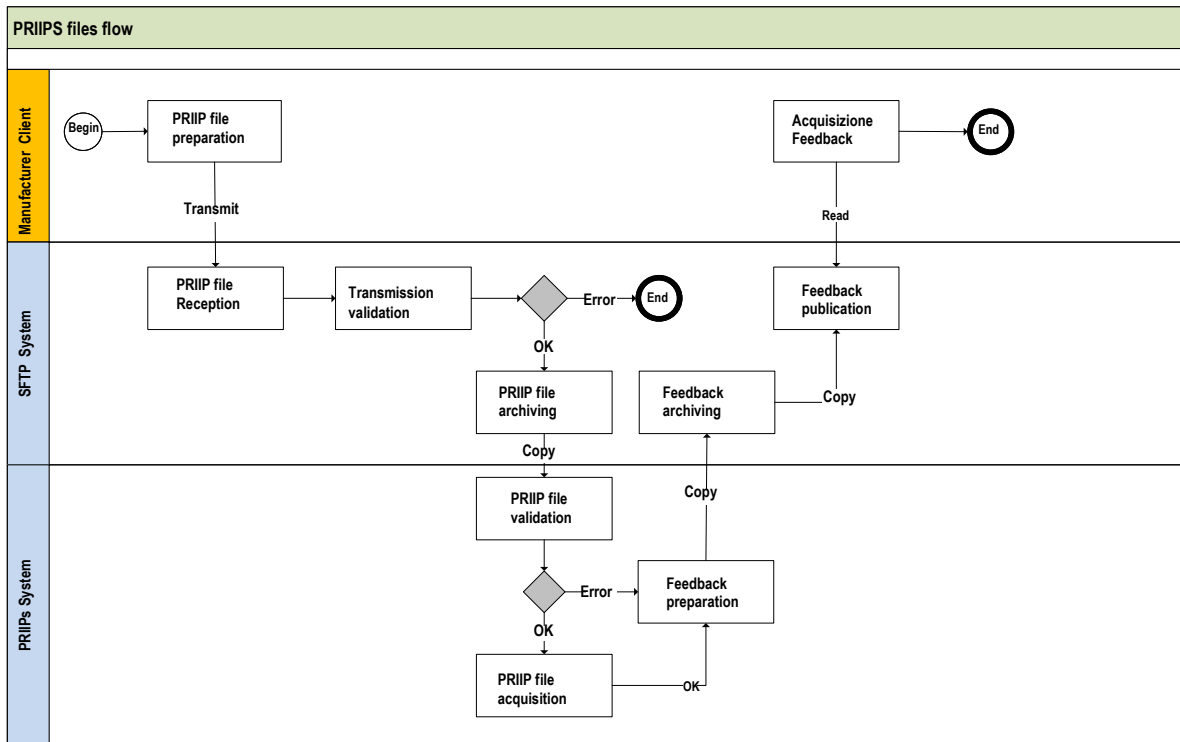


Figure 2 – PRIIP notifications acquisition process

<sup>5</sup> It is assumed that access to the SFTP server is granted to the manufacturer or other delegated user by means of credentials received after accreditation with CONSOB.

The feedback file is structured in order to contain:

- the reference to the data file, in terms of file name (in capital letters and including the extension), submitted by the manufacturer, against which feedback is provided.
- The overall validation status of the data file submitted by the creator in terms of positive (ACPT - accepted) or negative (RJCT - rejected) outcome; in the latter case, the data file must be corrected, using the information on the violated validation rules, and submitted again.
- The list of rules that were not met during the validation check in terms of a unique identifier (see Table 26) accompanied by a string containing additional details on the error.

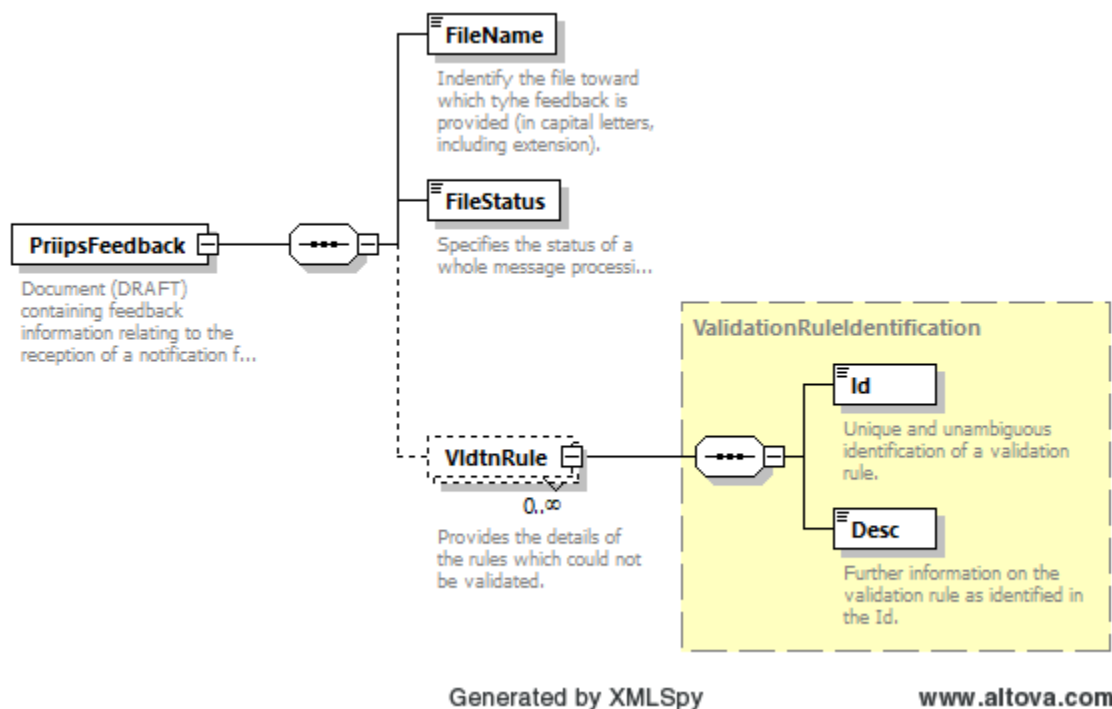


Figure 3 –Feedback file XML structure

The list of validation rules is shown in the table below. In some cases they collect multiple similar errors traceable by the same code; in these cases, the detail necessary for debugging (e.g. XML node in which the error is found, syntax of the check carried out with a negative outcome, error message found during the validation phase) is reported in a string field, dynamically valued with an accurate description of the error at validation failure time, which accompanies the identifier of the not satisfied validation rule.

Validation rules encoded in the feedback	
<b>FIL-001</b>	File name does not conform to the naming convention
<b>FIL-002</b>	Corrupted file (cannot be opened)
<b>FIL-003</b>	Missing file
<b>FIL-004</b>	File content not compliant with technical specifications
<b>FIL-005</b>	No delegation for the subject
<b>FIL-006</b>	Active delegated for the manufacturer subject
<b>FIL-007</b>	Wrong communication channel
<b>CON-001</b>	LEI code not found
<b>CON-002</b>	Product code not found (e.g. in the absence of a START previously sent with the same LEI code)
<b>CON-003</b>	Product type does not match
<b>CON-004</b>	Type of notification not admissible (e.g. duplicate START)
<b>CON-005</b>	Number of options not congruent
<b>CON-006</b>	Incompatible Duration/Expiration
<b>CON-007</b>	Missing guarantee system detail
<b>CON-008</b>	SRI not eligible for the product (e.g. SRI <7 for derivatives with aggregate KID)
<b>CON-009</b>	Inconsistent min and max SRI
<b>CON-010</b>	Inconsistent min and max RHP
<b>CON-011</b>	Missing expected performance scenario
<b>CON-012</b>	Missing expected cost structure
<b>CON-013</b>	Inconsistent min and max cost structure
<b>CON-014</b>	Attachment file name not specified
<b>CON-015</b>	Options to close not specified
<b>CON-016</b>	Inconsistent reference date (e.g. if subsequent to the acquisition date)
<b>CON-017</b>	Inconsistent closure date
<b>CON-018</b>	The last transmission cannot be canceled

*Table 26 - Validation rules encoded in the feedback*

## References

- [1] CONSOB, "Operating instructions about KID PRIIPs and related information access (new communication methods).", [Online]. Available: <https://www.consob.it/web/services-for-supervised-subjects/procedure-of-communication-of-priips-kid>.
- [2] CONSOB, "Resolution no. 21639 of 15 December 2020 relating to access to KIDs by CONSOB."
- [3] CONSOB, "Resolution no. 21640 of 15 December 2020 relating to the provisions concerning the obligations to make the information and structured data relating to the PRIIPs accessible to CONSOB by the creators."
- [4] CONSOB, "XSD scheme for the transfer of structured information useful for PRIIPs supervision through XML flows - Priips-DataFile\_1.1.xsd".
- [5] CONSOB, "XSD scheme for transferring feedback information associated with the transmission of a notification - Priips-FeedbackFile\_1.0.xsd".