FWW DataHub

MiFID-II-v4-Import-Format:CSV Description (EMT v4.0 / 4.1 / 4.2 / 4.3)

Document Revision History

Version	Date	Editor	Remarks
1.0	2022-07-25	uh@iss-fww.com	Initial public release for EMT v4.0
2.0	2023-06-15	uh@iss-fww.com	Inclusion of EMT version v4.1
3.0	2024-05-02	uh@iss-fww.com	Inclusion of EMT version v4.2
4.0	2026-01-15	uh@iss-fww.com	Inclusion of EMT version v4.3

Overview

FWW DataHub is a technical platform for the exchange of MiFID II related data of your funds.

To enable asset managers to reliably and smoothly relay the information needed by fund distributors, FWW defined a specific implementation of a data file containing the values of the European MiFID Template (EMT).

This document describes the technical details of a **CSV file format** (Comma-Separated Values text file) on the file level. The column definitions are **based on the EMT v4.0 (**"20220314 - FinDatEx - EMT V4 - final.xlsx"[1]) **and on the EMT v4.3** ("20251217 FinDatEx - EMT V4.3.xlsx"[2]) and are focused on **investment funds**.

Differences between EMT v4.0, v4.1, v4.2 and v4.3

EMT v4.0, v4.2 and v4.3 are all current versions of the European MiFID Template (EMT). The latest standard, v4.3, was published by FinDatEx as "completely optional" and will co-exist with the EMT versions v4.0 and v4.2.

FWW DataHub accepts CSV uploads for all these versions (see File Format below).

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[1] https://findatex.eu/mediaitem/09373df3-12cf-4a4a-ae29-eea6f8567965/20220314%20-%20FinDatEx%20-%20EMT%20V4%20-%20final.xlsx

EMT v4.1 did built on version v4.0, adding ten optional fields relevant to the UK market.
It has since been superseded by v4.2, which added another seven optional fields specific to the UK, and is otherwise fully compatible to v4.1.
Please consider using EMT v4.2 or later to help comply with the UK Consumer Duty regime[3] and UK Sustainable Finance Regulation in case it affects you or your distribution partners.

EMT v4.3 adds three optional fields related to "Value Cost Advantage" (VCA), which are relevant only for structured products distributed in France.

For products not being distributed in the UK and not subject to VCA regulation in France, EMT v4.0 is sufficient.

⚠ Please note that FWW DataHub does currently not validate or store the UK-only data fields present in EMT v4.1 and EMT v4.2 or the VCA data fields in EMT v4.3. The additional columns will be ignored and your data will be treated according to the definitions of EMT v4.0.

Important Notes and Changes from EMT v3.0 and EMT v3.1

EMT v4.0 is similar to the version 3.0. The interim version EMT v3.1 introduced additional, national ESG fields, that have been removed from the EMT in v4.0 (and moved to or replaced by the European ESG Template (EET), a separate template).

⇨ The main difference between EMT versions 3.0 and 4.0 is the name and definition of the field 05105:

> ❖ "05105_Does_This_Financial_Instrument_Consider_End_Client_Sustainability_ Preferences"

It now indicates whether a product is considering sustainability preferences within the meaning of the current European sustainably finance regulations.

⇨ It is now an official recommendation to use the CSV file format with the Vertical Bar / Pipe character (" | ") as value separator.
⚠ If you decide to use semicolon instead, make sure to enclose contents of any fields that may contain a semicolon in Text Qualifiers or uses proper Escaping. See the "File Format" section below.

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[2] https://findatex.eu/mediaitem/67b53b71-52af-47e3-8c8d-6df21dbc5978/20251217+FinDatEx+-+EMT+V4.3.xlsx
[3] https://www.fca.org.uk/firms/consumer-duty

File Format

"CSV": Plain-text file containing one line of delimiter-separated values per product

Character Encoding: UTF-8 (recommended), ISO/IEC 8859-1 Latin1 or Windows-CP1252
Byte Order Mark (BOM): accepted, but not recommended

Separator: one of the following characters, no mixing within one file:
- ❖ Vertical Bar / Pipe / `"|"` `(0x7C)` (FinDatEx recommendation)
- ❖ Tab `(0x09)`,
- ❖ Semicolon / `";"` (discouraged since EMT v3.1, because of 09020),
- ❖ Comma / `","` (discouraged)

Escaping: To represent a literal separator character in a value not enclosed in Text Qualifiers, the character **must** be preceded by a backslash (`0x5C`). A literal backslash must be represented by two backslashes (`\\`).

Text Qualifiers: optional. Any value may be wrapped in double-quotes (`"`).
To represent a literal double-quotes character (`"`) inside of Text Qualifiers, it may be either preceded by a backslash (`\"`) or doubled (`""`).

Line Endings: every line must be terminated with CR+LF (`0x0A, 0x0D`) or LF (`0x0D`). Line breaks are not allowed within headers or values, even if enclosed in Text Qualifiers.

Column Headers: The first line **must** contain column headers.
⚠️ The **first five characters must be the numeric ID** of the column as per EMT definition (also see 'Data Fields' below). We recommend using the full field names of the EMT for better readability, e.g. "00040_Financial_Instrument_Currency". Any other string starting with "00040" (or "00040" by itself) is acceptable as well. Please note you must include the leading zeroes.

Every line of your file **must** always **contain** at least **94 fields (EMT v4.0), 102 fields (EMT v4.1), 111 fields (EMT v4.2) or 114 fields (EMT v4.3)**. Extra columns not defined in this document are ignored, but will produce warnings.

Fields may be left **empty only if explicitly stated**, please see the "Mandatory"-Column in the EMT specification. Some fields may be mandatory depending on the contents of other fields.
To represent NULL values ("no value"), leave the field empty. Do **not** use `"n/a"`, `"NULL"`, `"-"`, "99.99" etc.

File Name: With FWW DataHub, you are free to name your files the way you want to, any reasonable character sequence (see `AlphaNumeric`) is acceptable. As the original file name will be logged, you may want to use unique names to be able to identify a single upload and

reference your own data later. We recommend using ".txt" or ".tsv" (when using Tab) or ".csv" as file name extension.

FinDatEx proposes a file naming convention in its EMT specification: The file name may start in "EMT_{version}_{date}", with {version} being the version number also provided in the field "00001_EMT_Version" and {date} being the date part from the field "00005_File_Generation_Date_And_Time". Example: EMT_V4_20230131…

Field Type Definitions

The following syntax definitions describe common field types.

```
Yes      = "Y" | "y" | "YES" | "yes" | "Yes" | "1" ;
No       = "N" | "n" | "NO" | "no" | "No" | "0" ;
Neutral  = "Neutral" | "neutral" | "NEUTRAL" | "-" ;
```

```
YesNoNeutral = Yes | No | Neutral ;
```

```
AlphaNumeric = 255 * [ ? Printable Characters ? ] ;  up to 255 printable
characters
```

Printable Characters refers to all visible characters and the space (anything except control characters), that is, to all **Unicode** characters that do not have the *Unicode General_Category Property* "Other"[4], short "C" (= Cc | Cf | Cs | Co | Cn), usually expressed as `\P{C}.`
In ASCII, it would refer to the range `0x20–0x7E`, and in ISO/IEC 8859-1 (Latin1) to the ranges
`0x20–0x7E, 0xA1–0xAC` and `0xAE–0xFF.`

```
Date = ? YYYY-MM-DD ? ;  ISO 8601 extended format date, e.g. "2019-02-27"
```

```
DateTime = ? YYYY-MM-DD hh:mm:ss ? ;  ISO 8601 extended format date and time,
without timezone, e.g. "2021-04-28 15:36:59"
```

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[4] http://unicode.org/reports/tr44/#GC_Values_Table

```
Digit = "0" | "1" | "2" | "3" | "4" | "5" | "6" | "7" | "8" | "9" ;
```

```
DecimalPercent = [ Digit ] , [ "." | "," ] , Digit, { Digit } ;
```
dot or comma as decimal separator

DecimalPercent represents a percentage in decimal form, e.g. `"1"` = 100%, `"0.3"` = 30%, `"0.01"` = 1%

The maximum precision (digits after the decimal point) for *DecimalPercent* is 15. Values will be rounded to 15 decimal places.

```
DecimalNumber = { Digit } , [ "." | "," ] , Digit, { Digit } ;
```

The maximum precision (digits after the decimal point) for *DecimalNumber* is 15. Values will be rounded to 15 decimal places.

Data Fields

All field definitions correspond to the fields of the EMT for funds (= Structured Funds or UCITS or Non UCITS, see 00060). Do **not** include Structured Securities in your file.

Your file is expected to contain all 94 fields defined in EMT v4.0, all 102 fields defined in EMT v4.1 or all 109 fields defined in EMT v4.2, starting with "00001_EMT_Version" and ending in "08120_Structured_Securities_Notional_ Reference_Amount", "09100_Review_Next_Due_UK", or "10060_Does_Financial_Instrument_Produce_ Client_Facing_Disclosures_UK" respectively.

Please refer to the FinDatEx EMT v4.0 specification for details:

https://findatex.eu/mediaitem/09373df3-12cf-4a4a-ae29-eea6f8567965/20220314%20-%20FinDatEx%20-%20EMT%20V4%20-%20final.xlsx

FinDatEx EMT v4.3 sepcification (including optional columns for the UK and VCA in France):

https://findatex.eu/mediaitem/67b53b71-52af-47e3-8c8d-6df21dbc5978/20251217+FinDatEx+-+EMT+V4.3.xlsx

Some field definitions are split into "Funds" and "Structured Securities". Please only follow the "Funds" related part in these cases.

(A detailed list of all fields and associated data types and rules may be provided here in a future version of this document.