

WHAT ARE THE CURRENT CHALLENGES UNDER EMIR REFIT?

Challenges but not showstoppers



More Fields to identify and map



XML 20022- might be in the wrong column!!



New data types (Events)



Open Position uploads



What is proving Challenging



UPI & to a lesser extent the UTI



TR UAT readiness



Focus on Data Controls (NCA reports)



Rules not yet fixed (recent change to ITS)



Time is not your friend for REFIT