

The answers to the questionnaire are based on the following concepts:

- In Brazil, every derivative must be registered, since 1994
- The set of information that must be provided by Trade Repositories to regulators is defined by regulators before the contract is made available to the market;
- The identification of beneficiaries and counterparties is made on final beneficiary level;
- Every transactions' information are sent to the regulators on a daily basis;
- 99% of derivatives registered in BM&FBOVESPA are CCP cleared; and
- 100% of exchange traded derivatives are controlled by BM&FBOVESPA.

Given Brazilian model presented, BM&FBOVESPA understands that in order to bring more transparency and convenience for OTC derivatives market UPI code must contain the following characteristics:

- It should avoid specific transaction information, containing just data related to the identification on the product level;
- It should be as short as possible, otherwise it would create unnecessary complexity and the complexity couldn't permits significant benefits;
- Despite the fact that dummy codes could allow more possibilities, we concluded that intelligent code could provide more standardization;
- In order to obtain adoption on global scale, it preferable to use only numeric characters;
- Ideally, information related to transaction (transaction level information) must be provided by Trade Repositories to regulators through specific processes and not in the UPI code composition.

Said that, our answer to the questionnaires are the following:

1. UPI must be composed by data related to derivatives products level and the list mentioned contained information like "underlier ID source" and "Notional schedule" that are more related to transaction level and must be sent to the regulators in specific files and not being part of the UPI composition. Additionally, a shorter UPI code would facilitate the adoption of UPI by all Trade Repositories on global scale.
2. Given the broad variety and new product opportunities in the OTC market, we understand that being able to classify new contracts as "Other" in the first moment would be useful. Nevertheless, it is necessary to have a robust governance that identifies the recurrent use of this domain and create a specific classification for this new derivative, avoiding the use of this "Other" category for long periods of time.

**The following answer applies for questions 3, 4, 5, 6 and 13.**

Information as underlying assets and their risk weights, source of the identifier for the underlie, proprietary benchmarks and indices are not practical for display in the UPI code. We understand that this information is better classified on "transaction level" and must be sent to regulators through specific files, and not being part of the UPI composition.

7. Intelligent code together with a well-articulated library (in the same manner that happens with ISIN code) could facilitate the UPI code use, once it could be easily understood by market participants on global scale, promoting a better standardization for those codes,

inclusively being more intuitive. Dummy codes could offer more possibilities of codes but on the other hand it seems to be the harder option to achieve a better understanding of the code in an intuitive manner.

8. Our suggestion related to UPI codes does not consider the possibility of using dummy codes together with intelligent ones, as explained in the answer for question number 10. However, in the case of a hybrid model being adopted it's important to invest time creating a well-articulated library for a better understanding of how to use UPI code.
9. The minimum UPI code size would be six (6) characters with a maximum of ten (10), once we believe that more than ten digits could not be practical and intuitive.
10. Our suggestion for intelligent code is, based on the fact that just basic information related to the product would be part of it, having specific characters that could identify each information in a simple manner. Thus, the library could have specifications as mentioned below:

| Data element                             | Characters | Codes                                                                                                     |
|------------------------------------------|------------|-----------------------------------------------------------------------------------------------------------|
| Asset class (Leg 1)*                     | 1          | <b>1</b> – Currency;<br><b>2</b> – Interest Rate;<br><b>3</b> – Commodities;<br><b>4</b> - ...            |
| Asset class (Leg 2)*                     | 1          | <b>1</b> – Currency;<br><b>2</b> – Interest Rate;<br><b>3</b> – Commodities;<br><b>4</b> - ...            |
| Instrument Type                          | 1          | <b>1</b> – Swap;<br><b>2</b> – Option;<br><b>3</b> – Forward                                              |
| Option Style                             | 1          | <b>1</b> – European;<br><b>2</b> – American;<br><b>3</b> – Bermudan;<br><b>4</b> - ...                    |
| Option Type                              | 1          | <b>1</b> – Put;<br><b>2</b> – Call;<br><b>3</b> - ...                                                     |
| Return, pricing method or payout trigger | 2          | <b>01</b> – Contract for Difference;<br><b>02</b> – Vanilla;<br><b>03</b> – Spreadbet;<br><b>04</b> - ... |
| CCP                                      | 1          | <b>1</b> – CCP Cleared;<br><b>2</b> – Non CCP Cleared                                                     |

\* Based on the example, in the case of swaps of the same asset class, i.e. currency, the first two characters would be 11. In the case of FX options and NDF, the code would be 11, also. If there is a swap CCY x IR the code would be 12.

11. During our analysis we did not identify the necessity of using a check digit.
12. In order to have a better standard, including thinking of technological issues for implementation, the codes should always have the same size, despite the fact of having different products and asset classes involved.

**The following answer applies for questions 14 and 15.**

Thinking of Brazilian market, using Roman letters in the UPI code is the ideal format to promote a larger number of combinations and possibilities, however, thinking of the differences between jurisdictions and ease of compliance on global scale, some jurisdictions may have systemic application problems given the fact that their alphabets are different. In that case, our suggestion is a numeric-only UPI code for implementation.