Axioma Reporting Solutions

Commodity Pool Operators CPO-PQR

As part of the Dodd-Frank Act, Form CPO-PQR is the equivalent of Form PF for commodity interests.

Registered Commodity Pool Operators are required to file quarterly reports detailing their holdings, performance, subscriptions, redemptions and all banking relationships.

Filing of Form CPO-PQR satisfies rules for both the Commodities and Futures Trading Commission (CFTC) and the National Futures Association (NFA). In order to ease filing obligations, the PQR filing is scaled down when the fund is already reporting to the SEC via Form PF.

At Axioma we work with your data to deliver the necessary outputs for your PQR filing. We use our data-driven approach to formulate the answers to the PQR and create an XML to the NFA specifications. We work with filers to upload the XMLs and monitor any data inputs not available for bulk upload. Our team of seasoned Regulatory professionals are adept at dealing with any NFA inquiries and offer the benefit of a vast knowledge base accumulated over hundreds of filings over the years.

Filing requirements

Filing obligations based upon AUM and PF status.

<table>
<thead>
<tr>
<th>CPO Size</th>
<th>First Quarter</th>
<th>Second Quarter</th>
<th>Third Quarter</th>
<th>Fourth Quarter</th>
</tr>
</thead>
<tbody>
<tr>
<td>Large CPO (AUM≥$1.5bil)*</td>
<td>CFTC A, B, C**</td>
<td>CFTC A, B, C**</td>
<td>CFTC A, B, C**</td>
<td>CFTC A, B, C**</td>
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<tr>
<td>Mid-Size CPO (AUM≥$150mil but &lt;$1.5bil)</td>
<td>NFA PQR</td>
<td>NFA PQR</td>
<td>NFA PQR</td>
<td>CFTC A, B</td>
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<tr>
<td>Small CPO (AUM&lt;$150mil)</td>
<td>NFA PQR</td>
<td>NFA PQR</td>
<td>NFA PQR</td>
<td>CFTC A + NFA PQR</td>
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<tr>
<td>IA that files Form PF</td>
<td>NFA PQR</td>
<td>NFA PQR</td>
<td>NFA PQR</td>
<td>CFTC A + NFA PQR</td>
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</tbody>
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* Schedule C Part 2 only applicable to pools ≥$500mil

Axioma benefits

Axioma Reporting Solutions reduces time spent consolidating and preparing data so that clients are able to pay more attention to reviewing and submitting reports. Unlike other RegTech platforms, Axioma seamlessly consolidates data from various back office sources, risk systems and regulatory calculations engine.
The managed service

On top of a powerful technology offering, the Axioma Reporting Solutions managed service takes pain out of clients’ hands in the form of a completely outsourced regulatory reporting service, driven by experienced and knowledgeable regulatory experts. We pair the technology platform with our proven managed service, which includes customization of a workflow between Axioma, client team and any additional vendors needed to produce client reports.

> **Identification of necessary data sources**, typically originating from a combination of Fund Administration raw output of positional information, prime broker counterparty data and internal client systems.

> **Build of a custom extraction, translation and loading process** (“ETL”) to receive raw data from identified sources and map it to a necessary format in the Data Console.

> **Validation of data once in the Data Console** and generation of specified report(s).

> **Maintenance and update of workflows** to account for raw data changes from client input.

Why Axioma?

Axioma is the worldwide provider of innovative regulatory reporting, risk management, portfolio construction solutions and indices to financial institutions worldwide. With an emphasis on innovation, outstanding service and open-platform technology, Axioma partners with its clients to provide more choice, greater flexibility and outstanding performance.