

# Order Record Keeping

Version 1.2

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## Amendments to the Document Version 1

- Codes 4 and 5 to fill ownership, decision making and executor are only allowed in equity market.
- New RI record fields, changing the execution date for the initial effective date and final effective date of the RI record information.
- Details of the functioning of the validity dates fields of RI records.
- Further details of CT record functioning.
- Further details of RC record functioning.
- Time slots limit of SFTP files sending is eliminated.
- Further details about the functioning of individual trades amendment data.
- Validity dates and action fields added to examples.

## Amendments to the Document Version 1.1

- The following validation has been removed: if DEA field is True, then execution within the firm field must be 3.
- In the Timetable, validation time for identifiers is modified in D+1 from 20:00h to 23:30h.
- Headers of records are modified from IR to RI.
- 5 new Error Codes are added in the VA record.
- New information added in Annex I: Fields Format.

## Amendments to the Document Version 1.1.1

- Value "A" of the field Action also means modification, Chapter 2.
- Modification of validations, Chapter 3.
- New format of the files out VA and VB, Chapter 5.
- The MD5 hash must be of 32 characters, Chapter 5.
- The 2nd MIC field deleted in the CT records examples (typo).
- The CONCAT code is amended in Example 1.
- Introduction of value "N" in the RC records to indicate the lack of Client, Decision and/or Execution within the firm.

- Explanation of RC Record fields is modified, Chapter 2.

## Amendments to the Document Version 1.1.2

- Type of Error VA is added on VB record (page 27).
- Modification of additional data of orders, detailed on page 14.
- Change of short code format on RI and DA records, from Int to Char (20) (pages 37, 40).
- Update of coherence rules, change in redaction (page 16).
- New file validation before processing (page 19).
- ORK historical management (page 25).

## 1 Introduction

EU Regulation No 600/2014 of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments, especially Article 25.2 stipulates that: "*The operator of a trading venue shall keep at the disposal of the competent authority, for at least five years, the relevant data relating to all orders in financial instruments which are advertised through their systems....*"

Commission Delegated Regulation (EU) 2017/580 of 24 June 2016 specifies that the data relating to each order that must be kept is as follows:

| FIELD NUMBER                                    | DESCRIPTION  |
|---|--|
| <b>Identification of the relevant parties</b>   |  |
| 1   | Identification of the entity which submitted the order |
| 2   | Direct Electronic Access (DEA)                         |
| 3   | Client identification code                             |
| 4   | Investment decision within the firm                    |
| 5   | Execution within the firm                              |
| 6   | Non-executing broker                                   |
| <b>Trading and liquidity provision capacity</b> |  |
| 7   | Trading capacity                                       |
| 8   | Liquidity provision activity                           |
| <b>Date and time</b>                            |  |
| 9   | Date and time  |
| <b>Validity period and order restrictions</b>   |  |
| 10  | Validity period  |
| 11  | Order restrictions                                     |
| 12  | Validity period and time                               |
| <b>Priority and sequence number</b>             |  |
| 13  | Priority time stamp                                    |
| 14  | Priority size  |
| 15  | Sequence number  |
| <b>Identification of the order</b>              |  |
| 16  | Segment MIC code                                       |
| 17  | Order book code  |

|    |                                   |
|----|-----------------------------------|
| 18 | Financial instrument ISIN         |
| 19 | Date of receipt of original order |
| 20 | Order identification code         |

#### **Events affecting the order**

|    |  |
|----|--|
| 21 | New order, order modification, order cancellation, order rejections, partial or full execution |
|----|--|

#### **Type of order**

|    |                           |
|----|---------------------------|
| 22 | Order type                |
| 23 | Order type classification |

#### **Prices**

|    |                        |
|----|------------------------|
| 24 | Limit price            |
| 25 | Additional limit price |
| 26 | Stop price             |
| 27 | Pegged limit price     |
| 28 | Transaction price      |
| 29 | Price currency         |
| 30 | Currency of leg 2      |
| 31 | Price notation         |

#### **Order instructions**

|    |   |
|----|---|
| 32 | Buy-sell indicator                                |
| 33 | Order status                                      |
| 34 | Quantity notation                                 |
| 35 | Quantity currency                                 |
| 36 | Initial quantity                                  |
| 37 | Remaining quantity including hidden               |
| 38 | Displayed quantity                                |
| 39 | Traded quantity                                   |
| 40 | Minimum acceptable quantity                       |
| 41 | Minimum executable size                           |
| 42 | Minimum acceptable quantity, first execution only |
| 43 | Passive only indicator                            |
| 44 | Passive or aggressive indicator                   |
| 45 | Self-execution prevention                         |
| 46 | Strategy linked order identification              |

|    |   |
|----|---|
| 47 | Routing strategy                              |
| 48 | Trading venue transaction identification code |

#### Trading phases, indicative auction price and volume

|    |                           |
|----|---------------------------|
| 49 | Trading phases            |
| 50 | Indicative auction price  |
| 51 | Indicative auction volume |

Necessary data to complete Order Record Keeping (ORK) required by MiFID II will be obtained from two different sources:

1. Data in the order: this is informed by the Member via FIX protocol. It will be included, among other data, a short code for the clientID, for the decision within the firm and for the execution within the firm. On SENAF orders, SAPI specifications will be applied
2. Information to be provided by the Member: the market members shall inform to the BME system the information related to the type and identification of the client, decision within the firm and execution within the firm (LEI, National ID, AlgoID) linked to each short code included in every order.

BME will validate the information send by the members in the order and in the different records to assure its consistency.

BME will inform about the situation of each one of these files and the result of validations of each one of these fields.

### Fields Included in the Order

The following fields are included by the Member in the order sent to the market:

| FIELD NUMBER                                    | DESCRIPTION  |
|---|--|
| <b>Identification of the relevant parties</b>   |  |
| 1   | Identification of the entity which submitted the order |
| 2   | Direct Electronic Access (DEA)                         |
| 3   | Client identification code                             |
| 4   | Code of investment decision within the firm            |
| 5   | Code of execution within the firm                      |
| 6   | Non-executing broker                                   |
| <b>Trading and liquidity provision capacity</b> |  |
| 7   | Trading capacity                                       |

---

8 Liquidity provision activity

---

**Validity period and order restrictions**

---

10 Validity period

---

11 Order restriction

---

**Identification of the order**

---

17 Order book code

---

**Events affecting the order**

---

21 New order, order modification, order cancellation, order rejections, partial or full execution

---

**Order type**

---

22 Order type

---

**Prices**

---

24 Limit price

---

25 Additional limit price

---

26 Stop price

---

**Order instructions**

---

32 Buy-sell indicator

---

36 Initial quantity

---

38 Displayed quantity

---

40 Minimum acceptable quantity

---

41 Minimum executable size

---

45 Self-execution prevention

---

46 Strategy linked order identification

---

On SENA orders, SAPI specifications will be applied

### Short Codes or Use of Identification Codes

Fields 3, 4 and 5 will be coded and are not mandatory in equity markets, but must be completed for Fixed income and derivatives markets, otherwise the order will be rejected by the market, as specified in the technical specifications of the FIX protocol . On SENA orders, SAPI specifications will be applied

The fields will be sent in the order using whole numbers between 100 and 4,294,967,295 ( $2^{32}-1$ ) (both included). These numbers are identification codes representing unique keys linked to a database managed by BME.

The following identification codes are defined for all users with the following values, as they have a predefined meaning, it is not necessary market members to submit complementary information to explain its meaning:

**Field 3, Client Identification Code (does not apply to SENA):**

- 0 – No client in this order (on own account). In this case it is not necessary to send any additional information.
- 1 – Aggregated order: associated with the flag “AGGR”.
- 2 – Order pending allocation: associated with flag “PNAL”.
- 4 – Client identification in the firm by “Client Reference” informed in the order. This value will be informed using the “Client Reference” field informed in the order as a link to the RI-CT record. This code is only allowed in equity market.
- 5 – The client will be informed by the Member afterwards with a RC record. This code is only allowed in equity market.

**Field 4, Investment decision within the firm:**

- 0 – No decision within the firm (the decision has been taken outside the firm).
- 4 – Decision within the firm identification by “Client Reference” informed in the order. This value will be informed using the “Client Reference” field informed in the order as a link to the RI-DW record. This code is only allowed in equity market.
- 5 – Decision within the firm identification will be informed by the Member afterwards with a RC record. This code is only allowed in equity market.

**Field 5, Execution within the firm:**

- 3 – Client, when the execution has been made directly by the client. In this case it is not necessary to send any additional information.
- 4 – Execution within the firm identification by “Client Reference” informed in the order. This value will be informed using the “Client Reference” field informed in the order as a link to the RI-EW record. This code is only allowed in equity market.
- 5 – Execution within the firm identification will be informed by the Member afterwards with a RC record. This code is only allowed in equity market.

In order to complete and modify the information related to the registered orders, the market members may use four different types of records:

1. CT record of clients
2. DW record of decision-makers within the firm
3. EW record of executors within the firm
4. DA record of additional data
5. RC record, by order number

Market members will be able to use two communication modes:

- a) By means of the utilization of client, decision maker and executor codes to incorporate/modify the data to the orders set where said codes are involved. Following records will be used for this purpose:

CT record of clients

DW record of decision-makers within the firm

EW record of executors within the firm

DA record of additional data.

- b) Linking the communication to a specific order. For this purpose the following records will be used:

RC record, by order number

When market members submit RI records to complete client, decision maker and executor data of the order, it can be made in two ways:

- Daily and one time only,, specifying an initial date and a final effective date "9999-12-31" or very far in the future.
- The system allows to point out records linked to a short code already informed when a change needs to be done, specifying an initial date and a final effective date different to the initial date

Validity dates allow to specify the effectiveness of the information that accompanies this record:

- Informing the initial effective date and final effective date is compulsory.  
If the information provided with the RI record is intended to be maintained forever, final date must be 9999-12-31. For those cases where the information provided with the record is considered static, the STR will keep it until the effective date or until another RI record is submitted to replace the previous one. (only for DW, EW)
- When an RI record has a range of dates that matches partially the range of dates of a previously sent RI record, TRS will take the information of the last RI sent just for the range of dates reported in the record. . (only for DW, EW)

## 2 Types of Record

The identifiers for natural persons must follow the ranking provided in Annex II: "National client identifiers for natural persons to be used in transaction reports" of Commission Delegated Regulation (EU) 2017/590 of 28 July 2016.

### CT Record- Client

CT record is associated with client identification and will allow to inform massively the LEI or National ID of the client of all orders with a specific client short code for validity dates.

They will have the following structure:

| NO. | FIELD         | INFORMATION   | DESCRIPTION  |
|-----|---------------|---|--|
| 1   | TypeReg       | RI  | Type of identification code record.  |
| 2   | Action        | A-Registration/<br>Adding ownership<br>B-Deregistration | Indicates the function of the RI record submitted.   |
| 3   | ExctgPty      | Legal entity<br>identifier (LEI)                        | Executing entity LEI.  |
| 4   | TrdnVn        | MIC   | MIC of market generating the record. The character "*" (asterisk) could be used to inform that the record is valid for all MICs. |
| 5   | Starting_Date | YYYY-MM-DD  | Record validity initial date with the format: YYYY-MM-DD.  |
| 6   | Ending_Date   | YYYY-MM-DD  | Record validity final date with the format: YYYY-MM-DD.  |
| 7   | Identifier    |   | Short code of client or Client Reference specified in the order.   |
| 8   | SubRegister   | CT  | Type of identification code record CT.   |
| 9   | PType         | LEI, P,   | Client ID type.  |
| 10  | LEI           | Legal entity<br>identifier                              | If PType=LEI. Client LEI   |
| 11  | Prsn_SchmeNm  | NIDN, CCPT,<br>CONCAT                                   | If PType=Prsn. ID type for natural person<br>NIDN = National ID<br>CCPT = Passport<br>CONCAT = CONCAT code                       |
| 12  | Prsn_Id       | National_ID   | If PType=Prsn. Client identification code.   |

If an order is for one account with several holders, the member must send as many CT records as holders exist with the same identifier (field 6), inside the same file.

The identifiers for natural persons must follow the ranking provided in Annex II: "National client identifiers for natural persons to be used in transaction reports" of Commission Delegated Regulation (EU) 2017/590 of 28 July 2016.

If there are several clients for the same identifier or trade (joint account), several RI records (one for each individual in the joint holding) must be sent on separate lines, using the same identifier (if RI used).

Each RI-CT record with the field Action = A adds a new client.

To modify the ownership of all the orders associated with a short code, it will be necessary to send a CT record with the field Action = B, indicating the range date of the orders that will be affected and, subsequently, a registration with the new one. information associated with that client short code.

If a record is sent with the "Deregister" command in a CT record sent for which joint holders would have been sent, BME will deregister all the joint holders associated with identifier of the RI-CT record, i.e. it is not possible to deregister just one holder in joint account records, rather all will have to be deregistered and a new correct list sent.

**This record does not apply to SENAFA.**

## DW Record- Investment Decision Within the Firm

These records contain information of the order decision maker's identity when the decision has been taken within the member for a validity dates.

They will have the following structure:

| NO. | FIELD         | INFORMATION   | DESCRIPTION  |
|-----|---------------|---|--|
| 1   | TypeReg       | RI  | Type of identification code record.  |
| 2   | Action        | A-Registration/<br>Modification<br>B-Deregistration | Indicates the function of the RI record submitted.   |
| 3   | ExctgPty      | Legal entity<br>identifier                          | LEI of the entity that enters the order.   |
| 4   | TrdnVn        | MIC   | MIC of market generating the record. The character "*" (asterisk) could be used to inform that the record is valid for all MICs. |
| 5   | Starting_Date | YYYY-MM-DD  | Record validity initial date with the format: YYYY-MM-DD.  |
| 6   | Ending_Date   | YYYY-MM-DD  | Record validity final date with the format: YYYY-MM-DD.  |

|    |                 |                         |   |
|----|-----------------|-------------------------|---|
| 7  | Identifier      |                         | Short code of decision maker within the firm or reference of the client informed in the order.                |
| 8  | SubRegister     | DW                      | Indicates that it is a DW record.   |
| 9  | Dcsn_typePrsn   | P-Person<br>A-Algorithm | Type of decision maker  |
| 10 | Dcsn_Algo       | Algorithm code          | If Dcsn_typePrsn='A'. Code of algorithm taking the transaction decision within the member.                    |
| 11 | Dcsn_Othr_SchNm | NIDN, CCPT,<br>CONCAT   | If Dcsn_typePrsn='P'. National ID code type.<br>NIDN = National ID<br>CCPT = Passport<br>CONCAT = CONCAT code |
| 12 | Dcsn_Othr_Id    | National_ID             | If Dcsn_typePrsn='P'. National ID of transaction decision maker within the member.                            |

## EW Record-Execution within the Firm

These records contain information of the identity of the entity submitting the order within the member.

It will have following structure:

| NO. | FIELD         | INFORMATION  | DESCRIPTION  |
|-----|---------------|--|--|
| 1   | TypeReg       | RI   | Type of identification code record.  |
| 2   | Action        | A- Registration/<br>Modification<br>B- Dereistration | Indicates the function of the RI record submitted.   |
| 3   | ExctgPty      | Legal entity identifier                              | LEI of the entity that enters the order.   |
| 4   | TrdnVn        | MIC  | MIC of market generating the record. The character "*" (asterisk) could be used to inform that the record is valid for all MICs. |
| 5   | Starting_Date | YYYY-MM-DD   | Record validity initial date with the format: YYYY-MM-DD.  |
| 6   | Ending_Date   | YYYY-MM-DD   | Record validity final date with the format: YYYY-MM-DD.  |
| 7   | Identifier    |  | Short code of executor within the firm or reference of the client informed in the order.   |
| 8   | SubRegister   | EW   | Indicates that it is an EW record.   |
| 9   | Exct_typePrsn | P-Person<br>A-Algorithm                              | Type of transaction executing entity within the member.  |
| 10  | Exct_Algo     | Algorithm code                                       | If Dcsn_typePrsn='A'. Code of algorithm sending order to the market within the executing member.                                 |

|    |                |                      |  |
|----|----------------|----------------------|--|
| 11 | Exct_Othr_SchN | NIDN, CCPT, CONCAT m | If Dcsn_typePrsn='P'. National ID code type<br>NIDN = National ID<br>CCPT = Passport number<br>CONCAT = CONCAT code. |
| 12 | Exct_Othr_Id   | National_ID          | If Dcsn_typePrsn='P'. National ID of the person sending the order to the market within the executing member.         |

## RC Record-Order Number

The record RC allows to link information through the order number. This record contains the information of the client of the order, decision within the firm, execution within the firm and additional data indicator of DEA, trading capacity and liquidity provision indicator.

RC record has priority over RI records information. RC records can overwrite order information provided in a RI record, but RI records cannot replace RC order information.

This record does not apply to SENAIF.

| NO. | FIELD     | INFORMATION   | DESCRIPTION   |
|-----|-----------|---|---|
| 1   | TypeReg   | RC  | Type of record associated to the correction of a specific order   |
| 2   | Action    | A- Registration /Modification<br>B- Dereistration   | It indicates the RC purpose   |
| 3   | ExctPty   | Legal Entity Identifier   | LEI of the entity that enters the order   |
| 4   | TrdnVn    | MIC   | MIC of market generating the record   |
| 5   | OrderType | ORD – Simple Order<br>QUO – Quote Order<br>BLO – Agreed price trade<br>RFQ – Request for quote<br>PLV – Settlement value positions<br>FON – Funds trading | Type of order, determines validation of field OrderID   |
| 6   | OrderID   |   | Order identification number   |
| 7   | Date      | YYYY-MM-DD  | Date on which the order is entered  |
| 8   | BuySell   | B-Buy<br>S-Sell   | Buy or sell indicator   |
| 9   | PType     | LEI, P, PNAL, AGGR, N   | Type of identification for the buyer or the seller:<br>- LEI<br>- P: Physical person<br>- PNAL: The client of the order is unknown<br>- AGGR: It is an aggregate order<br>- N: There is no client |

|                       |                    |  |  |
|-----------------------|--------------------|--|--|
|                       | 10 LEI             | Legal Entity Identifier  | If PType=LEI. Client LEI code  |
|                       | 11 Prsn_SchmeNm    | NIDN, CONCAT   | If PType=P. Type of identification of the physical person  |
|                       | 12 Prsn_Id         | National_ID  | If PType=P. Client identification code   |
| Decision within firm  | 13 Dcsn_typePrsn   | P-Person<br>A-Algorithm<br>N-There is no decision within the firm  | Type of decision within the firm identification  |
|                       | 14 Dcsn_Algo       | Algorithm code   | If Dcsn_typePrsn='A'. Code of the algorithm that makes the decision within the firm of the trade     |
|                       | 15 Dcsn_Othr_SchNm | NIDN, CONCAT, CCPT   | If Dcsn_typePrsn='P'. Type of code of the National ID  |
|                       | 16 Dcsn_Othr_Id    | National_ID  | If Dcsn_typePrsn='P'. National_ID of the person that makes the decision within the firm of the trade |
|                       | 17 Exct_typePrsn   | P-Person<br>A-Algorithm<br>N-There is no execution within the firm | Type of execution within the firm identification   |
| Execution within firm | 18 Exct_Algo       | Algorithm, code  | If Exct_typePrsn='A'. Code of the algorithm that sends the order to the market within the firm       |
|                       | 19 Exct_Othr_SchNm | NIDN, CONCAT   | If Exct_typePrsn='P'. Type of code of the National ID  |
|                       | 20 Exct_Othr_Id    | National_ID  | If Exct_typePrsn='P'. National_ID of the person that sends the order to the market within the firm   |
|                       | 21 DEA             | 1,0 (True/False)   | Direct Electronic Access indicator   |
| Additional Data       | 22 TradCap         | DEAL,MTCH,AOTC   | Trading capacity indicator   |
|                       | 23 LiqProvAct      | 1,0 (True/False)   | Liquidity provision indicator  |

If there are several clients for same order (joint accounts), several RC records (one for each individual in the joint holding) must be sent on separate lines, setting Action field to "A". Decision maker and executor information can be sent only once to complete this kind of order, no additional data is needed.

Once one or several clients have been sent for an order, a new RC record with the value "N" at field (9) Client PType would delete all the current clients and the only one for that order would be stated as "N" (there is no client, it is an own account trade).

When it is only required to amend trade decision maker or trade executor, market member just has to send a registration RC record reporting the new decision maker or trade executor. In this case is not necessary to fulfil ownership fields. If the client is the decision maker and executor (there is no decision maker and executor within the firm) those fields cannot be blank, so the value "N" will be informed at fields "Dcsn\_typePrsn" and "Exct\_typePrsn" (decision maker and executor type of person) to explicitly indicate there is not decision maker and executor within the firm. So, if the fields DecisorID and ExecutorID were filled at the order with a value "5" or they have a wrong short code, ORK will not show an error message asking for decision maker and executor information.

The DEA, TradCap and LiqProvAct fields are additional data included in the order and they do not need to be informed on RC records. They need to be sent only to amend the DEA indicator, trading capacity and liquidity provision indicator. It is not necessary to fulfil client, decision maker and executor information to amend any of these fields. It is just required to submit a registration RC record with the trade identification data and the information of any of these fields that is going to be updated. If an order is alive, additional data can only be modified in the exchange, in case an RC record is sent with information on additional data fields, record will be rejected

The submission of a deregistration RC record causes deregistration of all information previously communicated for that trade with a registration RC. Therefore, it will be necessary to send again a RC record with all the information of the trade (client, decisor and executor).

## ORK Historical Management

ORK historical management consist in a separation of the data base, that aim to achieve greater efficiency and rationalization of the information received from market members that, in addition, result in the process of daily consolidation of orders introduced in the exchange, as well as in the process of consolidating historical data.

The current BME ORK database manages all orders received from market members since January 3, 2018. With the new version, the database will be divided into two main areas:

- **Historical area:** Where those orders corresponding to the year 2018 correctly reported will be incorporated. These orders will not be modified after their inclusion in the historical area of the database.
- **Work area:** The orders corresponding to the year 2019 and all those orders for the year 2018 that are not correctly reported.

### Historic area

- Received RC records regarding orders in the historic zone will be rejected.
- The RI registers (clients-decisors-executors) already used in the orders that are in the historical area can only be modified as long as the initial date of the modification of

the RI registration is equal to or greater than January 1, 2019, accepting the Start date and end date of the RI registration in the same way as it is currently done.

#### Work area

Market members will use the same procedures and record formats as currently, and can send RI records - with start date, end date and identification of the MIC of the application market segment, and RC records.

### 3 Validations

As explained in the introduction to the document, the following identifiers are predefined and fixed.

#### Field 3, Client identification code

- 0 – If the order has no client (on own account).
- 1 – Aggregated order: associated with the flag “AGGR”.
- 2 – Order pending allocation: associated with flag “PNAL”.
- 4 – Client identification through client reference. **It only applies to equity markets.**
- 5 – The client will be informed afterwards with a RC record. **It only applies to equity markets.**

#### Field 4, Investment decision within the firm

- 0 – If the order decision was not within the entity (it was customer's decision).
- 4 – Decision within the firm identification through client reference. **It only applies to equity markets.**
- 5 – The decision within the firm will be informed afterwards through a RC record. **It only applies to equity markets.**

#### Field 5, Execution within the firm

- 3 – Client: when executed directly by the client.
- 4 – Execution within the firm identification through client reference. **It only applies to equity markets.**
- 5 – The execution within the firm will be informed afterwards through a RC record. **It only applies to equity markets.**

BME will perform the following checks to validate the consistency of the data sent by the market members. These validations will be made relating the following fields:

- (2) Direct Electronic Access (DEA)
- (3) Client identification code
- (4) Investment decision within firm code

- (5) Execution within firm code
- (7) Trading Capacity
- (8) Liquidity provision
  
- **Validation 1: If the order has NO client** (client short code is 0, the order has no client related to the short code, there is not a RC record with a client or a RC record has been sent with client "N") then:
  - the order must have a decision maker: a DW record associated to the decision maker short code or a RC record reporting the order decision maker have been sent,
  - the (7) trading capacity has to be DEAL or MTCH.
- **Validation 2: If the order has a client**, code is 1 ("AGGR") or 2 ("PNAL"), a CT record associated to the order short code or an RC with client information or flags "AGGR", "PNAL" has been sent, then:
  - the (7) trading capacity has to be AOTC or MTCH.
- **Validation 3: If the order has been informed as true in (2) Direct Electronic Access (DEA)**, then:
  - the order must have a client, client code is 1 ("AGGR") or 2 ("PNAL") a CT record associated to the order short code or a RC record with the information of the client or flags "AGGR", "PNAL" has been sent,
  - the order cannot have a decisor: the decisor short code is 0, the order has no decisor associated to the short code, a RC record with the decisor has not been sent or it has been sent with the decisor informed as "N", and
  - the trading capacity is AOTC or MTCH.
- **Validation 4: If the order has NO execution within the firm**, (the order is executed by the client), i.e the executor short code is 3, the order has no executor associated to the short code, a RC record has not been sent with the executor or it has been sent with executor informed as "N") then:
  - the order must have a client: a CT record associated to the order short code or a RC record with the information of the client different to "N" has been sent,
  - the order cannot have decision within the firm: the decisor short code is 0, the order has no decisor associated to the short code, a RC record with the decisor has not been sent or it has been sent with the decisor informed as "N", and
  - the trading capacity is AOTC.

## 4 Timetable

### Data Feed from the Member to BME

The files with the necessary records to complete the orders information can be submitted to BME SFTP server at any time.

For the purpose of the files submission, the consolidation process of the information will consider that every file sent after 23:30h has been sent in the next day.

### Data Feed from BME to the Member

#### 1. Validation of inbound INB file:

Market members will receive an OUT file with the answer of each file sent and the validations corresponding to it. The file status will be stated at a FI record as described in the Table 1 (page 21).

#### 2. First ORVB file. Daily consolidation:

From 23:30h of the orders' introduction day (day D), a first ORVB file will be sent with the consolidation of days D and D-1 which will contain orders and short codes that should have been informed and orders that do not meet the coherence validations.

#### 3. Second ORVB file. Historical consolidation:

This file will be generated in case the firm has sent information related to orders out of time, i.e those sent to the market before D-1.

The file will be generated from 23:30h after the creation of the first ORVB file with the daily consolidation, and only in the case that during the day there were records sent regarding to out of time orders sent before D-1 (where D is the order's sending day).

The file will show the status of the orders affected by records, in case they have not been correctly informed or insufficiently.

## 5 Notifications

### Technical Aspects of Inbound Files

Files are coded in UTF8 format with a variable string length depending on the record type; fields are delimited using the character ";".

Text fields (Char) will be delimited by double quotation marks. Within any field, double quotation mark is not allowed.

The following data types are specified hereon to determine the maximum values allowed:

**Decimal** Numeric fields where the “.” character is used to separate decimals.

For negative figures, the ‘-’ sign is included to the left of the first significant digit. The specified number of significant digits cannot be exceeded.

**Date** Fields to specify dates and with the format YYYY-MM-DD.

**Datetime** Used to specify dates and time, using the ISO 8601 format YYYY-MM-DDThh:mm:ss.fffffffZ.

**Char** Text fields that must be completed with the specified number of characters. Spaces must be inserted to the right if there are fewer characters.

**Varchar** Text fields that can be completed with required characters without exceeding the specified maximum.

### Nomenclature of the Files Sent by Member

The name of the file containing the long code records that a member wants to send will comprise the following:

**INB\_LEI1\_LEI2\_TIPO\_AAAAMMDD\_SEQ.EXT\_MD5**

- INB (3) → INBOUND. Indicates an inbound file.
- LEI1 (20) → LEI of the member sending the file.
- LEI2 (20) → LEI of the member on behalf of which the file is being sent. Can be the same as LEI1 if the members are one and the same.
- TYPE (4) → File type: **ORK**

- YYYYMMDD (8) → File communication date.
- SEQ (3) → Three-digit sequence. Example: 001
- EXT (3) → Extension of the text file . MD5 (33 → The file's MD5 hash of 32 characters may be included after the extension to be able to validate that the file is the same at the source and destination.

This file will contain the various types of records defined in this document. Each ,DAT file will be compressed on a .ZIP file

As a general rule, any deliveries by a member will be accepted. Deliveries are additive (except when there is a syntax error in the content of the file, in that case the entire file will be rejected). Batch file uploads are allowed.

Inbound files to the ORK will be processed in the order they are received, Members are responsible for sending them in the correct order.

A reply file will be immediately generated for each file uploaded to the ORK system, specifying whether the file was satisfactorily loaded.

The process of loading INB files will perform the following validations before processing the information

Files with repeated nomenclature: If a file with a name identical to that of another previously sent file is sent, the file sent in the filesin folder of the SFTP will be renamed adding the prefix "REP\_" and that file will not be processed.

Files with the same content: If a file is sent whose content is identical to the one already sent, the file sent will be renamed in the filesin folder of the SFTP, adding the prefix "MD5\_" and that file will not be processed.

## Nomenclature and Format of the Files Sent by the ORK to Members

The names of files containing the records of information on status of the records that the ORK sends to a member will comprise the following:

**OUT\_ LEI1\_ LEI2\_ TIPO\_ AAAAMMDD\_ SEQ.EXT\_M5**

- OUT (3) → OUTBOUND. Indicates an outbound file.
- LEI1 (20) → LEI of the member sending the file.
- LEI2 (20) → LEI of the member on behalf of which the file is being sent. Can be the same as LEI1 if the members are one and the same.
- TYPE (4) → File type: **ORK**.
- YYYYMMDD (8) → File generation date.

- SEQ (3) → Three-digit sequence. Example: 001
- EXT (3) → Extension of the file MD5 (33) → The file's MD5 hash of 32 characters may be included after the extension to be able to validate that the file is the same at the source and destination.

This file contains two types of records informing about:

1. Result of the validation of syntax and content of RI or RC records.
2. Result of consolidation process validations at the session end of data in the order and information to be provided by the Member.

## FI Records

This type of record contains information sent by BME to members on BME's processing of a file sent by a member, indicating the GLOBAL status of the file. Details of the possible validation errors are given in the VA record.

Its structure is as follows:

| NO. | FIELD        | INFORMATION | DESCRIPTION                         |
|-----|--------------|-------------|-------------------------------------|
| 1   | TypeReg      | FI          | Record type                         |
| 2   | Source       |             | ORK: BME ORK system                 |
| 3   | CreDT        |             | Date sent                           |
| 4   | ExctgPty     | LEI         | Market LEI                          |
| 5   | FileName     |             | Name of INB file sent by the member |
| 6   | Sts          |             | Status (Table 1)                    |
| 7   | TtlNbOfRcrds |             | Total registers                     |
| 8   | stACTP       |             | Number of accepted transactions     |
| 9   | stPDNG       |             | Number of pending transactions      |
| 10  | TRSJCT       |             | Number of rejected transactions     |
| 11  | TRSCVD       |             | Number of received transactions     |

Table 1:

| STATUSCODE | NAME               | DEFINITION   |
|------------|--------------------|--|
| ACPT       | Accepted           | Report has been accepted   |
| CRPT       | Corrupted file     | The file is corrupt  |
| INCF       | Incorrect filename | File name is incorrect   |
| PART       | Partially accepted | Report has been partially accepted. Some records have been accepted and others not |
| RJCT       | Rejected           | The entire report has been rejected  |
| MISS       | Missing Records    | Report has been accepted, but there are missing records                            |

## VA Records

This type of record contains information sent by BME to members on BME's processing of a file sent by a member, giving details of the validation errors detected.

The FI and VA records must be processed in order, as all the consecutive VA records are related with the immediately superior FI record.

Its structure is as follows:

| NO. | FIELD     | INFORMATION DESCRIPTION                                      |
|-----|-----------|--|
| 1   | TypeReg   | VA Record type   |
| 2   |           | Empty  |
| 3   | Origin    | Answer information origin.                                   |
| 4   | LineNum   | Number of the line of the original file. Where the error is. |
| 5   | Sts       | Status (Table 1)   |
| 6   | RuleId    | Validation rule Id   |
| 7   | FileNm    | Name of the field in error.                                  |
| 8   | IdRTS     | Related field with RTS 22 format.                            |
| 9   | ErrCd     | Error code.  |
| 10  | ErrMssg   | Error message in text format.                                |
| 11  | OrgnValue | Original value.  |

Table of error codes:

| CODE    | DESCRIPTION   |
|---------|---|
| 1055    | DA record Ending Date must be prior to D-1  |
| 2001    | Orders with this short code has not its associated information for this date  |
| 2002    | This order has code 5 in Client field, but its information has not been submitted in a RC record  |
| 2003    | This order has code 5 in Decision field, but its information has not been submitted in a RC record  |
| 2004    | This order has code 5 in Executor field, but its information has not been submitted in a RC record  |
| 2011    | Order has no client, there has to be decision within the firm and capacity cannot be AOTC   |
| 2012    | The order has a Client, capacity cannot be DEAL   |
| 2013    | DEA order. There must be a Client, there is no Decision within the firm and capacity will have to be AOTC   |
| 2014    | If Client executes the order, the holder cannot be the market member, there is not decision within firm and capacity has to be AOTC   |
| 2015    | Client short code cannot be a number below 100  |
| 2016    | Decision maker short code cannot be a number below 100  |
| 2017    | Executor short code cannot be a number below 100  |
| 2101    | The RC register does not match with any order available in the current Data Base  |
| 2102    | RC record has additional data fields that cannot amend an order that is still in the market and must be amended through the GUI   |
| 2103    | DA record cannot be associated to any order   |
| 2104    | DA record has additional data fields that cannot amend an order that is still in the market and must be amended through the GUI   |
| 2105    | RI record cannot be associated to any order   |
| 2107    | RC record has found an order and has been consolidated correctly  |
| 2108    | DA record has found orders and has been consolidated correctly  |
| 2109    | RI record has found orders and has been consolidated correctly  |
| ACPT    | All orders information has been consolidated correctly  |
| CON-048 | The value should be a string of 20 characters where first 18 characters are capital letters or numbers and 2 last characters are numbers  |
| CON-074 | The format of the buyer identification code is incorrect  |
| CON-077 | If person national identifier is used, only one of the following values can be populated: 'NIDN', 'CCPT', 'CONCAT'  |
| CON-078 | If LEI is used, the value should be a string of 20 characters where first 18 characters are capital letters or numbers and 2 last characters are numbers. / If national identifier is used, |

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|         |   |
|---------|---|
|         | the value should be a string of no more than 35 characters. / If MIC is used, the value should be a string of 4 characters (letters or numbers). / For internal, the 'INTC' code should be reported.  |
| CON-164 | The format of the seller code is incorrect  |
| CON-168 | If LEI is used, the value should be a string of 20 characters where first 18 characters are capital letters or numbers and 2 last characters are numbers. / If national identifier is used, the value should be a string of no more than 35 characters. / If MIC is used, the value should be a string of 4 characters (letters or numbers). / For internal, the 'INTC' code should be reported |
| CON-297 | Only one of the following values can be populated: 'DEAL', 'MTCH', 'AOTC'   |
| CON-368 | The reported value should be a string of 4 characters (letters or numbers). /   |
| CON-573 | If person national identifier is used, the first 2 characters of the national identification code should be an ISO 3166 country code that was valid at the trading date   |
| CON-574 | The format of the executing person code is incorrect  |
| CON-577 | If person national identifier is used, only one of the following values can be populated: 'NIDN', 'CCPT', 'CONCAT'  |
| CON-578 | In case an algorithm identifier is used, the following characters are only allowed: capital Latin letters (A-Z), numbers (0-9)  |
| CON-590 | The national identification code does not include valid country code  |
| CON-591 | The format of the executing person code is incorrect  |
| CON-597 | If person national identifier is used, only one of the following values can be populated: 'NIDN', 'CCPT', 'CONCAT'  |
| CON-598 | In case an algorithm identifier is used, the following characters are only allowed: capital Latin letters (A-Z), numbers (0-9)  |
| CON-807 | Only 'B' or 'S' values allowed (Buy/Sell)   |
| CON-857 | Only one of the following values can be populated: 'LEI', 'MIC', 'P', 'INTC'  |
| CON-867 | Only one of the following values can be populated: 'LEI', 'P'   |
| CON-897 | Data should be one of the following: P=Person; A=Algorithm  |
| CON-907 | The format should be one of the following: P=Person; A=Algorithm  |
| CON-917 | Only 'A' or 'B' values allowed (A-Registration/B-Deregistration)  |
| CON-927 | Only one of the following values can be populated: 'LEI', 'P', 'PNAL', 'AGGR', 'N'  |
| CON-937 | Only one of the following values can be populated: 'ORD', 'QUO', 'BLO', 'RFQ', 'PLV', 'FON'   |
| CON-950 | Date time must be the same or before the system date time   |
| CON-951 | Trading date cannot be earlier than the agreed date of the first trading date to be reported under MiFIR or earlier than 5 years before the current date  |
| CON-967 | Only 'True' or 'False' values allowed   |
| CON-977 | Only 'True' or 'False' values allowed   |
| CON-987 | Only 'CT', 'DW' or 'EW' values allowed  |

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|          |  |
|----------|--|
| CTR-046  | Submitting / Executing LEI not allowed by BME. Please check registration   |
| CTR-070  | LEI XXX is not valid   |
| CTR-071  | If person national identifier is used, the first 2 characters of the national identification code should be an ISO 3166 country code that was valid at the trading date  |
| CTR-160  | If LEI is used, this field shall be populated with a LEI accurately formatted and in the LEI database included in the GLEIF database maintained by the Central Operating Unit. / 1. The status of the LEI shall be "Issued", "Lapsed", "Pending transfer" or "Pending archival". / 2. The InitialRegistrationDate of the LEI shall be equal or before the trading date. / 3. The EntityStatus shall be Active or if the EntityStatus is Inactive, the LastUpdateDate shall be equal or after the trading date. |
| CTR-161  | If national identifier is used, the first 2 characters of the national identification code should be an ISO 3166 country code that was valid at the trading date   |
| CTR-362  | Not authorised MIC   |
| CTR-701  | Deregistration Action. No Registration record was found or it was rejected   |
| CTR-761  | Field should be a text string of no more than 10 characters  |
| CTR-763  | Short code. RI short code cannot be a number below 100   |
| CTR-764  | Field should not be greater than 4.294.967.295   |
| CTR-765  | Wrong client short code, please submit a RC record to provide client information   |
| CTR-766  | The RI register has been used in orders previous to the current Data Base  |
| CTR-869  | This client has already been submitted   |
| CTR-900  | Short code not allowed, it must be above 100   |
| CTR-900  | Short code not allowed, it must be above 100   |
| CTR-911  | Deregistration Action. No Registration record was found or it was rejected   |
| CTR-955  | Date must be a trading date  |
| CTR-956  | Initial date can not be after Final Date   |
| DAR-001  | The DA register has been used in orders previous to the current Data Base  |
| DWR-765  | Wrong decisión maker short code, please submit a RC record to provide decision maker information   |
| DWR-766  | The RI register has been used in orders previous to the current Data Base  |
| DWR-909  | This decisor has already been submitted  |
| EWR-765  | Wrong executor short code, please submit a RC record to provide executor information   |
| EWR-766  | The RI register has been used in orders previous to the current Data Base  |
| EWR-899  | This ejecutor has already been submitted   |
| NOORDERS | No order has been submitted to the market  |
| STA-001  | File containing the report has an incorrect filename.  |
| STA-002  | File containing the report is corrupted.   |

|         |  |
|---------|--|
| STA-004 | Error Parser CSV. Check that limiters and the file is codified as UTF8   |
| STA-005 | Error in the de-encryption. Check you have used the BME public key.  |
| STA-006 | File containing the report has an incorrect filename. LEI of the member sending the file   |
| STA-007 | File containing the report has an incorrect filename. LEI of the member on behalf of which the file is being sent  |
| STA-008 | File containing the report has an incorrect filename. File type  |
| STA-009 | File containing the report has an incorrect filename. File communication date  |
| STA-010 | File containing the report has an incorrect filename. Sequence   |
| STA-011 | File containing the report has an incorrect filename. File extension DAT / XML   |
| STA-012 | File containing the report has an incorrect filename. File extension gpg   |
| STA-013 | File containing the report has an incorrect filename. MD5  |
| STA-014 | File containing the report has an incorrect filename. INBOUND  |
| STA-015 | File containing the report has an incorrect filename. Content zip file   |
| STA-016 | File containing the report has an incorrect filename. File extension zip   |
| STA-045 | ExctgPty LEI code cannot be different from filename ExctgPty LEI code  |
| STA-971 | Wrong register type  |
| STA-990 | Record type does not exist   |
| STA-991 | Number of fields in your register do not match with the requested.   |
| STR-925 | RC record with no information added  |
| STX-040 | ExctgPty. Field is mandatory   |
| STX-042 | Field should be a text string of no more than 20 characters  |
| STX-070 | Client identification. Field is mandatory  |
| STX-072 | If LEI is used, the value should be a string of 20 characters where first 18 characters are capital letters or numbers and 2 last characters are numbers. / If national identifier is used, the value should be a string of no more than 35 characters. / If MIC is used, the value should be a string of 4 characters (letters or numbers). / For internal, the 'INTC' code should be reported. |
| STX-073 | Field should be a text string of no more than 6 character  |
| STX-160 | Client identification. Field is mandatory  |
| STX-162 | If LEI is used, the value should be a string of 20 characters where first 18 characters are capital letters or numbers and 2 last characters are numbers. / If national identifier is used, the value should be a string of no more than 35 characters. / If MIC is used, the value should be a string of 4 characters (letters or numbers). / For internal, the 'INTC' code should be reported. |
| STX-163 | Field should be a text string of no more than 6 character  |
| STX-292 | Field should be a text string of no more than 4 characters   |

|         |   |
|---------|---|
| STX-360 | MIC code. Field is mandatory  |
| STX-362 | Field should be a text string of no more than 4 characters  |
| STX-572 | If national identifier is used, the value should be a string of no more than 35 characters. / If algorithm identifier is used, the value should be a string of no more than 50 characters.  |
| STX-573 | If person national identifier is used, it should be restricted to a passport number (use of code CCPT in the SchmeNm/Cd tag), other national identifier as defined in RTS Annex 2 (use of code NIDN in the SchmeNm/Cd tag) or CONCAT (use of proprietary with value CONCAT in the SchmeNm/Prtry tag). |
| STX-592 | If person national identifier is used, the value should be a string of no more than 35 characters. / If algorithm identifier is used, the value should be a string of no more than 50 characters.   |
| STX-593 | If national identifier is used, it should be restricted to a passport number (use of code CCPT in the SchmeNm/Cd tag), other national identifier as defined in RTS Annex 2 (use of code NIDN in the SchmeNm/Cd tag) or CONCAT (use of proprietary with value CONCAT in the SchmeNm/Prtry tag). /      |
| STX-760 | Shortcode. Field is mandatory.  |
| STX-762 | The reported value should be a string of 20 characters  |
| STX-800 | BuySell. Field is mandatory.  |
| STX-802 | Field should be a text string of no more than 1 characters  |
| STX-850 | Action. Field is mandatory.   |
| STX-852 | Field should be a text string of no more than 4 characters  |
| STX-862 | Field should be a text string of no more than 4 characters  |
| STX-892 | Field should be a text string of no more than 1 characters  |
| STX-900 | Decision maker type. Field is mandatory.  |
| STX-902 | Field should be a text string of no more than 1 characters  |
| STX-922 | Field should be a text string of no more than 1 characters  |
| STX-930 | Order type. Field is mandatory.   |
| STX-932 | Field should be a text string of no more than 3 character   |
| STX-940 | OrderID. Field is mandatory.  |
| STX-942 | Field should be a text string of no more than 12 character  |
| STX-950 | Date. Field is mandatory.   |
| STX-952 | Field must be populated with a valid date in the following format: YYYY-MM-DD   |
| STX-962 | Field should be a text string of no more than 1 character   |
| STX-972 | Field should be a text string of no more than 1 character   |
| STX-980 | Shortcode type. Field is mandatory.   |
| STX-982 | Field should be a text string of no more than 2 characters  |

## VB Records

This type of records, which are generated after 23:30, contain information from BME to the Member relative to state in which the orders remain once the process of consolidation of information received in the order and in the files submitted by the member has been completed.

Its structure is as follows:

| NO | FIELD      | INFORMATION                  | DESCRIPTION  |
|----|------------|------------------------------|--|
| 1  | TypeReg    | VB                           | Record type.   |
| 2  | Date       | YYYY-MM-DD                   | Date of the order whose information is uncompleted. (only for RC)  |
| 3  | Tipo_Err   | RI,RC                        | Indicates if it is uncompleted because of: <ul style="list-style-type: none"> <li>— RI: an identifier has been used for which no additional data has been provided.</li> <li>— RC: code 5 predefined has been used and no additional information of the order has been provided.</li> <li>— VA: order has coherence error</li> </ul> |
| 4  | Tipo_RI    | CT, DW, EW                   | If type_Err='RI', it will inform of the type of identifier that is necessary to submit and has not been submitted.   |
| 5  | Tipo_Ord   | ORD, QUO, BLO, RFQ, PLV, FON | If type_Err='RC' it will inform about the type of order for which the necessary information has not been submitted.  |
| 6  | BuySell    | B-Buy<br>S-Sell              | If type_Err='RC' it will inform about the side of the order for which the necessary information has not been submitted. (Only if it is RC).  |
| 7  | Id         |                              | Number of order if it is RC and short code of the record if it is RI.  |
| 8  | ErrCd      |                              | Error Code.  |
| 9  | ErrDscrptn |                              | Description of the Error.  |

## 6 Corrections

As per Commission Delegated Regulation (EU) 2017/580, members must report details of orders related with financial instruments before end of day of D+1.

In terms of ORK, the updating of any field of an order implies a new record in its log and the consolidation of the new data contributed for successive entries. Both the original records and the notifications of changes will remain on the records.

Since ORK feeds on orders entered into the exchange, as long as an order persists in the exchange all modification must be done within the exchange. This modification will naturally flow to the ORK.

Corrections described on this section may be used once the order **is not on the market anymore**. Provided an order persists in the exchange, corrections made on the ORK will not have any effect on the order.

Also, when an order has gone to the historical area, (see “ORK historical management” within the section "2. Types of records") cannot be modified

### Fields That Can Be Modified in a Correction

Details of the ORK fields that can be modified are as follows:

| ORK FIELD NUMBER | DESCRIPTION                         |
|------------------|-------------------------------------|
| 2                | Direct Electronic Access (DEA)      |
| 3                | Client identification code          |
| 4                | Investment decision within the firm |
| 5                | Execution within the firm           |
| 7                | Trading capacity                    |
| 8                | Liquidity provision activity        |

“Direct Electronic Access (DEA)”, “Trading capacity” and “Liquidity provision activity” fields are not amendable in SENA markets.

### Method 1. Batch Amendment

This method can be used to change as a batch all data associated with a short code, decision-maker or executor within the entity, for all orders involved.

To do this, the member must resend the RI-DW or RI-EW record with the appropriate duly modified data.

This new RI-DW or RI-EW record with the same identifier and new decision maker and / or associated executor description, will replace the previous one that is modified.

In addition, a massive correction may be done of the fields (2) DEA, (7) Trading capacity and (8) Liquidity provision activity (in the SENAF market case only field 8 could be modified). For this purpose, DA record will be used, linking the short code of the client (CT), decision maker within the firm (DW), or executor within the firm (EW) with the new data provided. This connection will produce that all the orders using the chosen identifier, change their values for the 2, 7 and 8 aforementioned fields to the values indicated on the DA record. If any of the orders that is going to be modified with a DA record is alive in the exchange, DA record will be rejected and no change will be applied. If an order is alive, these three field can only be modified at the exchange.

As the aim of DA record is to amend existing trades, it must not contain a later date than D-2 (with D being the submitting day).

Structure of the DA record:

| NO. | FIELD        | DATA             | DESCRIPTION  |
|-----|--------------|------------------|--|
| 1   | TypeReg      | DA               | Record type.   |
| 2   | ExctgPty     | LEI              | LEI of the entity that enters the order.   |
| 3   | TrdnVn       | MIC              | MIC of market generating the record. The character "*" (asterisk) could be used to inform that the record is valid for all MICs. |
| 4   | Initial Date | YYYY-MM-DD       | Initial date of the order to be amended in format YYYY-MM-DD   |
| 5   | Final Date   | YYYY-MM-DD       | Final date of the order to be amended in format YYYY-MM-DD   |
| 6   | Type Id Ref  | CT,DW,EW         | It indicates the reference identifier type that will be used.  |
| 7   | Id Ref       |                  | Reference identifier number that will be used.   |
| 8   | DEA          | 1,0 (True/False) | DEA identifier.  |
| 9   | TradCap      | DEAL, MTCH, AOTC | Capacity identifier.   |
| 10  | LiqProvAct   | 1,0 (True/False) | Liquidity provider activity identifier.  |

## Method 2. Individual Amendment

To amend any data that can be modified, market member must send a registration RC record to amend decision maker and executor information. To amend ownership data a deregistration RC record and then a registration RC record must be submit. Further information about RC record functioning can be found in chapter 2.

## 7 Examples

### Example 1. Corresponds to Example 43 in the ESMA Guidelines. Document with Reference ESMA/2016/1452

A trader supervised by the head office of an American Firm, Firm F with LEI 549300ATRSCPTXGNEI40 with branches in Paris (FR), London (GB) and Frankfurt (DE) decides to buy a certain financial instrument. The transaction is executed by the operator in the market with MIC XMRV. The membership of Firm F is held by the branch in Frankfurt. The Firm is trading on own account.

The operator of Firm F enters code 0 in the "client identification number" field of the order bulletin as the entity is trading on its own account. As a predefined code is used, there is no need to send an associated RI-CT record at zero.

It is assumed that the DW and ES short code identifiers are 120 and 125, respectively, for which an associated long code must be sent with the following format:

| NO. | FIELD           | RI-DW RECORD         |
|-----|-----------------|----------------------|
| 1   | TypeReg         | RI                   |
| 2   | Action          | A                    |
| 3   | ExctgPty        | 549300ATRSCPTXGNEI40 |
| 4   | MIC             | XMRV                 |
| 5   | Starting_Date   | 2018-04-01           |
| 6   | Ending_Date     | 2018-04-01           |
| 7   | Identifier      | 120                  |
| 8   | SubRegister     | DW                   |
| 9   | Dcsn_typePrsn   | P                    |
| 10  | Dcsn_Algo       |                      |
| 11  | Dcsn_Othr_SchNm | CONCAT               |
| 12  | Dcsn_Othr_Id    | US19770912JON#DEWIT  |

| NO. | FIELD    | RI-EW RECORD         |
|-----|----------|----------------------|
| 1   | TypeReg  | RI                   |
| 2   | Action   | A                    |
| 3   | ExctgPty | 549300ATRSCPTXGNEI40 |
| 4   | MIC      | XMRV                 |

|    |                 |                      |
|----|-----------------|----------------------|
| 5  | Starting_Date   | 2018-04-01           |
| 6  | Ending_Date     | 2018-04-01           |
| 7  | Identifier      | 125                  |
| 8  | SubRegister     | EW                   |
| 9  | Exct_typePrsn   | P                    |
| 10 | Exct_Algo       |                      |
| 11 | Exct_Othr_SchNm | CONCAT               |
| 12 | Exct_Othr_Id    | HU19800413ADAM#JONES |

\*Data in grey have been assumed for the examples, they are not given in the heading.

## Example 2. Corresponds to Example 82 in the ESMA Guidelines Document with Reference ESMA/2016/1452

Investment Firm X (DEA client) with LEI 12345678901234500000 uses the membership code of Investment Firm Y (DEA provider) with LEI 549300P0EH641RMF7T94 in order to submit an order on Trading Venue M with MIC XMRV. The order of Investment Firm X consists in buying financial instruments on Trading Venue M. Investment Firm X is acting on behalf of Client 1 called Jean Cocteau, whose details are transmitted to Investment Firm Y pursuant to Article 4 of RTS 22. Algorithm 123456789 is responsible for the execution.

The operator of the Investment Firm enters the CT and EW short code identifiers only as the decision-maker was not within the Firm (DW). In this case, it is assumed that the identifiers are 122 and 159, respectively, for which an associated long code must be sent with the following format:

| NO. | FIELD         | RI-CT RECORD         |
|-----|---------------|----------------------|
| 1   | TypeReg       | RI                   |
| 2   | Action        | A                    |
| 3   | ExctgPty      | 549300P0EH641RMF7T94 |
| 4   | MIC           | XMRV                 |
| 5   | Starting_Date | 2018-08-01           |
| 6   | Ending_Date   | 2018-08-01           |
| 7   | Identifier    | 122                  |
| 8   | SubRegister   | CT                   |

|    |              |                      |
|----|--------------|----------------------|
| 9  | PType        | P                    |
| 10 | LEI          |                      |
| 11 | Prsn_SchmeNm | CONCAT               |
| 12 | Prsn_Id      | FR19620604JEAN#COCTE |

| NO. | FIELD           | RI-EW RECORD         |
|-----|-----------------|----------------------|
| 1   | TypeReg         | RI                   |
| 2   | Action          | A                    |
| 3   | ExctgPty        | 549300P0EH641RMF7T94 |
| 4   | MIC             | XMRV                 |
| 5   | Starting_Date   | 2018-08-01           |
| 6   | Ending_Date     | 2018-08-01           |
| 7   | Identifier      | 159                  |
| 8   | SubRegister     | EW                   |
| 9   | Exct_typePrsn   | A                    |
| 10  | Exct_Algo       | 123456789            |
| 11  | Exct_Othr_SchNm |                      |
| 12  | Exct_Othr_Id    |                      |

\*Data in grey have been assumed for the examples, they are not given in the heading.

### Example 3. Corresponds to Example 65 in the ESMA Guidelines Document with Reference ESMA/2016/1452

Trader 1 makes a decision to buy a financial instrument for Client A under a discretionary mandate from Client A and Trader 2 places an order with Investment Firm Y to buy the instrument. Investment Firm Y, acting on a matched principal capacity, executes the order on Trading Venue M on 1 June 2018 at 14:51:09.123 at a price of EUR 32.50 using an algorithm with identifier ALGO12345.

The operator of Firm Y enters the CT, DW and ES short code identifiers in the order bulletin, which are assumed to be the identifiers 188, 114 and 127, respectively, for which an associated long code must be sent with the following format:

| NO. | FIELD         | RI-CT RECORD         |
|-----|---------------|----------------------|
| 1   | TypeReg       | RI                   |
| 2   | Action        | A                    |
| 3   | ExctgPty      | 5493007EY8MYC8PNZP26 |
| 4   | MIC           | XMRV                 |
| 5   | Starting_Date | 2018-04-01           |
| 6   | Ending_Date   | 2018-04-01           |
| 7   | Identifier    | 188                  |
| 8   | SubRegister   | CT                   |
| 9   | PType         | LEI                  |
| 10  | LEI           | 123456123456123      |
| 11  | Prsn_SchmeNm  |                      |
| 12  | Prsn_Id       |                      |

| NO. | FIELD           | RI-DW RECORD         |
|-----|-----------------|----------------------|
| 1   | TypeReg         | RI                   |
| 2   | Action          | A                    |
| 3   | ExctgPty        | 5493007EY8MYC8PNZP26 |
| 4   | MIC             | XMRV                 |
| 5   | Starting_Date   | 2018-04-01           |
| 6   | Ending_Date     | 2018-04-01           |
| 7   | Identifier      | 114                  |
| 8   | SubRegister     | DW                   |
| 9   | Dcsn_typePrsn   | P                    |
| 10  | Dcsn_Algo       |                      |
| 11  | Dcsn_Othr_SchNm | CONCAT               |
| 12  | Dcsn_Othr_Id    | ES12345678TRADER#UNO |

| NO. | FIELD   | V-EW RECORD |
|-----|---------|-------------|
| 1   | TypeReg | RI          |
| 2   | Action  | A           |

|    |                 |                      |
|----|-----------------|----------------------|
| 3  | ExctgPty        | 5493007EY8MYC8PNZP26 |
| 4  | MIC             | XMRV                 |
| 5  | Starting_Date   | 2018-07-01           |
| 6  | Ending_Date     | 2018-07-01           |
| 7  | Identifier      | 127                  |
| 8  | SubRegister     | EW                   |
| 9  | Exct_typePrsn   | A                    |
| 10 | Exct_Algo       | ALGO12345            |
| 11 | Exct_Othr_SchNm |                      |
| 12 | Exct_Othr_Id    |                      |

\*Data in grey have been assumed for the examples, they are not given in the heading.

#### Example 4. Aggregated Order on Equity Informing of Holder Reference

Firm E1 receives a request to sell 9000 securities of Client A with holder reference number 1234567890123456789 and 1000 securities of Client B with holder reference number ABCDEFGHIJKLMNOPQRST to close out its open positions in TELEFONICA stocks.

Firm E1 performs a transaction on its own account in market XMAD to sell 10,000 TELEFONICA stocks. The Firm uses various algorithms for making the transaction decision and sending it to the market.

The operator of Firm E1 enters the CT, DW and EW short code identifiers in the order bulletin. For the first, as it is an aggregated order, the field must be completed with the value 1 (value preassigned to aggregated orders AGGR). For the others, it is assumed that the identifiers are 222 and 333, respectively, for which an associated long code must be sent with the following format:

| NO. | FIELD         | RI-DW RECORD         |
|-----|---------------|----------------------|
| 1   | TypeReg       | RI                   |
| 2   | Action        | A                    |
| 3   | ExctgPty      | 549300470IY7S220K805 |
| 4   | MIC           | XMAD                 |
| 5   | Starting_Date | 2017-05-18           |
| 6   | Ending_Date   | 2017-05-18           |
| 7   | Identifier    | 222                  |

|    |                 |          |
|----|-----------------|----------|
| 8  | SubRegister     | DW       |
| 9  | Dcsn_typePrsn   | A        |
| 10 | Dcsn_Algo       | 1234ALGO |
| 11 | Dcsn_Othr_SchNm |          |
| 12 | Dcsn_Othr_Id    |          |

| NO. | FIELD           | RI-EW RECORD         |
|-----|-----------------|----------------------|
| 1   | TypeReg         | RI                   |
| 2   | Action          | A                    |
| 3   | ExctgPty        | 549300470IY7S220K805 |
| 4   | MIC             | XMAD                 |
| 5   | Starting_Date   | 2017-05-18           |
| 6   | Ending_Date     | 2017-05-18           |
| 7   | Identifier      | 333                  |
| 8   | SubRegister     | EW                   |
| 9   | Exct_typePrsn   | A                    |
| 10  | Exct_Algo       | 456ALGO              |
| 11  | Exct_Othr_SchNm |                      |
| 12  | Exct_Othr_Id    |                      |

\*Data in grey have been assumed for the examples, they are not given in the heading.

### Example 5. Trade Individually Informed Through RC Record

The investment services entity X sends a buy order to the market XMAD of 1000 lots for Client A. Client A has conferred power of representation to the advisory entity E. The investment services entity X has send the order to the market M through algorithm "1234 ALGO".

The order is introduced in the system using short code 5 in the fields "Client Identification", "Decision within the firm" and "Execution within the firm". The order is received on the market with OrderID 1237.

Subsequently, entity X submits the following RC record:

| NO | FIELD           | RC RECORD            |
|----|-----------------|----------------------|
| 1  | TypeReg         | RC                   |
| 2  | Action          | A                    |
| 3  | ExctPty         | 5493007EY8MYC8PNZP26 |
| 4  | TrdnVn          | XMAD                 |
| 5  | TipoOrden       | ORD                  |
| 6  | OrderID         | 12377412             |
| 7  | Fecha           | 2018-02-01           |
| 8  | BuySell         | B                    |
| 9  | PType           | P                    |
| 10 | LEI             |                      |
| 11 | Prsn_SchmeNm    | NIDN                 |
| 12 | Prsn_Id         | ES456789V            |
| 13 | Dcsn_typePrsn   | N                    |
| 14 | Dcsn_Algo       |                      |
| 14 | Dcsn_Othr_SchNm |                      |
| 16 | Dcsn_Othr_Id    |                      |
| 17 | Exct_typePrsn   | A                    |
| 18 | Exct_Algo       | ALGO12345            |
| 19 | Exct_Othr_SchNm |                      |
| 20 | Exct_Othr_Id    |                      |
| 21 | DEA             |                      |
| 22 | TradCap         |                      |
| 23 | LiqProvAct      |                      |

## ANNEX 1: Fields Format

### RI Record Format. Identifier Record

| Nº | RTS 22 FIELD      | TYPE | LONG INFORMATION  |
|----|-------------------|------|---|
| 1  | TypeReg           | Char | 2 RI  |
| 2  | Action            | Char | 1 A-Registration/Modification<br>B-Deregistration   |
| 3  | 4 ExctgPty        | Char | 20 Executing entity LEI   |
| 4  | MIC               | Char | 4 MIC of market generating the record.  |
| 5  | Starting_Da<br>te | Date | 10 Record validity initial date with the format: YYYY-MM-DD   |
| 6  | Ending_Dat<br>e   | Date | 10 Record validity final date with the format: YYYY-MM-DD.  |
| 7  | Id                | Char | 20 ClientIID when the subregister is CTDcsnwFirm when the subregister is DW type (all)<br>ExctwFirm when the subregister is EW type (all) |
| 8  | SubRegiste<br>r   | Char | 2 Indicates type of record preceded by this header:.CT, DW or<br>EW   |

### SubRegister CT of Clients Format

| Nº | RTS 22 FIELD          | TYPE | LONG INFORMATION   |
|----|-----------------------|------|--|
| 1  | SubRegist<br>er       | Char | 2 CT   |
| 2  | PType                 | Char | 4 LEI, MIC, P, INTC. Buyer or seller ID type. INTC will be informed when the transaction is aggregated.  |
| 3  | 7,16 LEI              | Char | 20 If PType=LEI. Legal entity LEI code. If the identifier is an ordering party (as is the case with fund managers), the fund manager's LEI will be used. |
| 4  | 7,16 Prsn_Sch<br>meNm | Char | 6 If PType=P. ID type for natural person. NIDN,CCPT,CONCAT   |
| 5  | 7,16 Prsn_Id          | Char | 35 If PType=P. Client identifier, DNI (national ID) for Spain.   |

## SubRegister DW of Decisor Makers “Within Firm” Format

| Nº        | RTS | FIELD           | TYPE | LONG | INFORMATION  |
|-----------|-----|-----------------|------|------|--|
| <b>22</b> |     |                 |      |      |  |
| 1         |     | SubRegister     | Char | 2    | DW   |
| 2         | 57  | Dcsn_typePrsn   | Char | 1    | P-Person<br>A-Algorithm  |
| 3         | 57  | Dcsn_Algo       | Char | 50   | If Dcsn_typePrsn='A'. Code of algorithm taking the transaction decisión within the firm.                     |
| 4         | 57  | Dcsn_Othr_SchNm | Char | 6    | If Dcsn_typePrsn='P'. NATIONAL_ID code type. NIDN, CCPT, CONCAT  |
| 5         | 57  | Dcsn_Othr_Id    | Char | 35   | If Dcsn_typePrsn='P'. National_ID of the person sending the order to the Market within the executing member. |

## SubRegister EW of Executors “Within Firm” Format

| Nº        | RTS | FIELD           | TYPE | LONG | INFORMATION  |
|-----------|-----|-----------------|------|------|--|
| <b>22</b> |     |                 |      |      |  |
| 1         |     | SubRegister     | Char | 2    | EW   |
| 2         | 59  | Exct_typePrsn   | Char | 1    | P-Person<br>A-Algorithm<br>C-Client  |
| 3         | 57  | Exct_Algo       | Char | 50   | If Exct_typePrsn='A'. Code of algorithm executing the transaction within the firm.                           |
| 4         | 59  | Exct_Othr_SchNm | Char | 6    | If Dcsn_typePrsn='P'. NATIONAL_ID code type.   |
| 6         | 59  | Exct_Othr_Id    | Char | 35   | If Dcsn_typePrsn='P'. National_ID of the person sending the order to the Market within the executing member. |

## RC Record Format

|                      | <b>NO.</b> | <b>FIELD</b>    | <b>TYPE</b> | <b>LONG DESCRIPTION</b>   |
|----------------------|------------|-----------------|-------------|---|
| Trade Data           | 1          | TypeReg         | Char        | 2 RC  |
|                      | 2          | Action          | Char        | 1 A- Registration/Modification<br>B- Deregistration   |
|                      | 3          | ExctPty         | Char        | 20 Legal Entity Identifier  |
|                      | 4          | TrdnVn          | Char        | 4 MIC   |
|                      | 5          | OrderType       | Char        | 3 ORD – Simple Order<br>QUO – Quote Order<br>BLO – Agreed price trade<br>RFQ – Request for quote<br>PLV – Settlement value positions<br>FON – Funds trading |
|                      | 6          | OrderID         | Char        | 52  |
|                      | 7          | Date            | Char        | 10 YYYY-MM-DD   |
|                      | 8          | BuySell         | Char        | 1 B-Buy<br>S-Sell   |
|                      | 9          | PType           | Char        | 4 LEI, P, PNAL, AGGR, N   |
|                      | 10         | LEI             | Char        | 20 Legal entity identifier  |
| Trade Holder         | 11         | Prsn_SchmeNm    | Char        | 6 NIDN, CONCAT  |
|                      | 12         | Prsn_Id         | Char        | 35 National_ID  |
|                      | 13         | Dcsn_typePrsn   | Char        | 1 P-Person<br>A-Algorithm<br>N-There is no decision within the firm   |
|                      | 14         | Dcsn_Algo       | Char        | 50 Algorithm code   |
|                      | 15         | Dcsn_Othr_SchNm | Char        | 6 NIDN, CONCAT  |
|                      | 16         | Dcsn_Othr_Id    | Char        | 35 National_ID  |
| Decision within firm |            |                 |             |   |
|                      |            |                 |             |   |

|                              |    |                 |      |  |
|------------------------------|----|-----------------|------|--|
| <b>Execution within firm</b> | 17 | Exct_typePrsn   | Char | 1 P-Person<br>A-Algorithm<br>N-There is no execution within the firm |
|                              | 18 | Exct_Algo       | Char | 50 Algorithm code  |
|                              | 19 | Exct_Othr_SchNm | Char | 6 NIDN, CONCAT   |
|                              | 20 | Exct_Othr_Id    | Char | 35 National_ID   |
| <b>Additional Data</b>       | 21 | DEA             | Char | 1 1,0 (True/False)   |
|                              | 22 | TradCap         | Char | 4 DEAL, MTCH, AOTC   |
|                              | 23 | LiqProvAct      | Char | 1 1,0 (True/False)   |

## DA Record Format- Additional Data Register

| NO. | FIELD       | TYPE | LONG | DESCRIPTION      |
|-----|-------------|------|------|------------------|
| 1   | TypeReg     | Char | 2    | DA               |
| 2   | ExctgPty    | Char | 20   | LEI Id.          |
| 3   | TrdnVn      | Char | 4    | MIC code         |
| 4   | F_Inicial   | Char | 10   | YYYY-MM-DD       |
| 5   | F_Final     | Char | 10   | YYYY-MM-DD       |
| 6   | Type_Id_Ref | Char | 2    | CT / DW / EW     |
| 7   | Id_Ref      | Char | 20   | Shortcode        |
| 8   | DEA         | Char | 2    | 1,0 (True/False) |
| 9   | TradCap     | Char | 4    | DEAL, MTCH, AOTC |
| 10  | LiqProvAct  | Char | 20   | 1,0 (True/False) |

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