

MTS BondVision Approach to MiFID II Order Submission Requirements

Buyside focus



MiFID II order submission requirements



From 3rd January 2018, MiFID II will require trading venues to collect information from its participants for the purposes of:

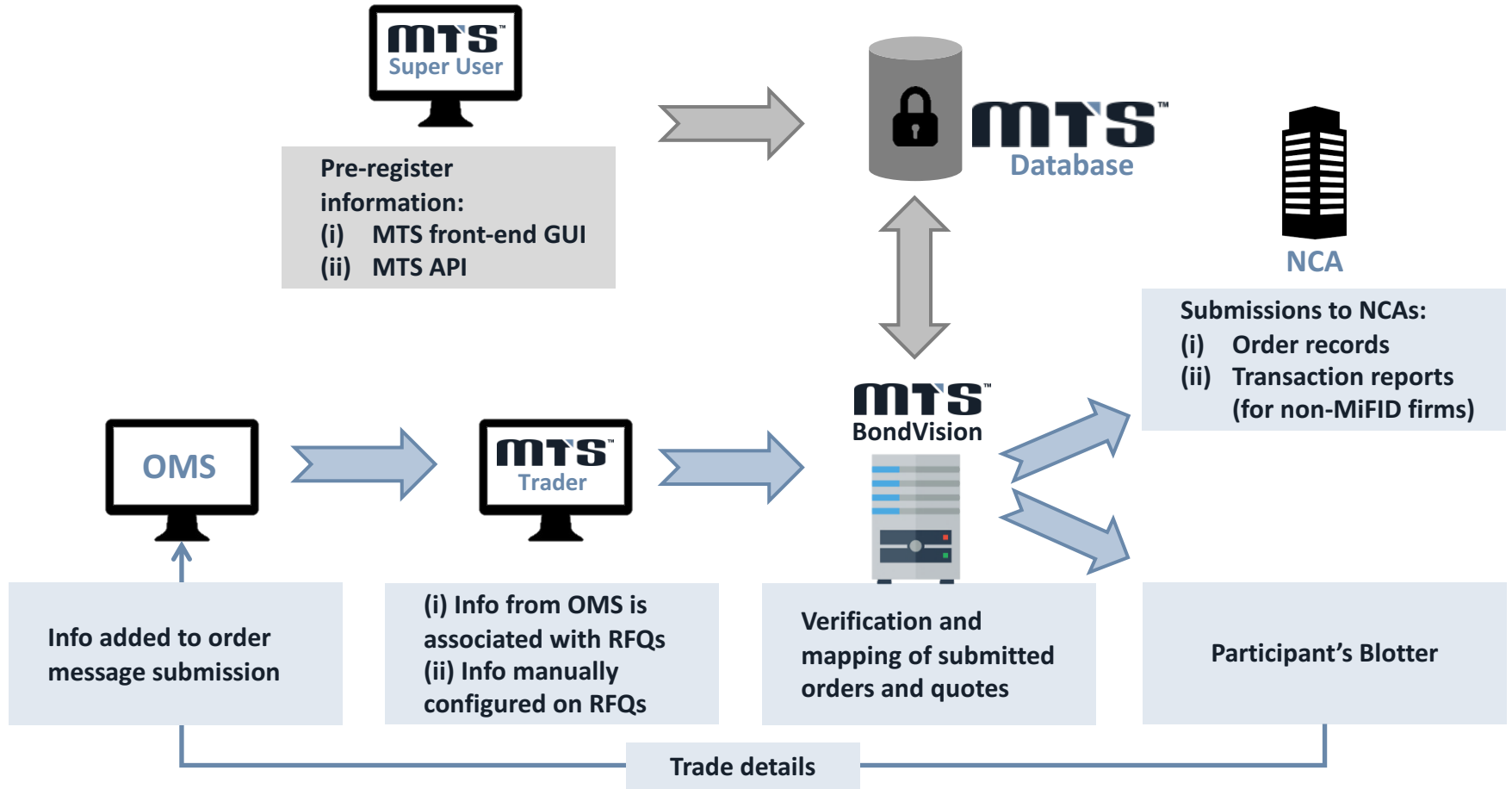
- order record keeping (MiFIR Article 25, RTS 24)
- systems and controls (MiFID II Article 48, RTS 7)
- for non-MiFID firms only: transaction reporting (MiFIR Article 26, RTS 22)

MTS has evaluated the information required and has developed an approach by which to collect this information efficiently and store it securely.

Note that this presentation focuses on the pre-registration and order submission requirements associated with the Execution ID and Investment Decision Maker ID, and related information.



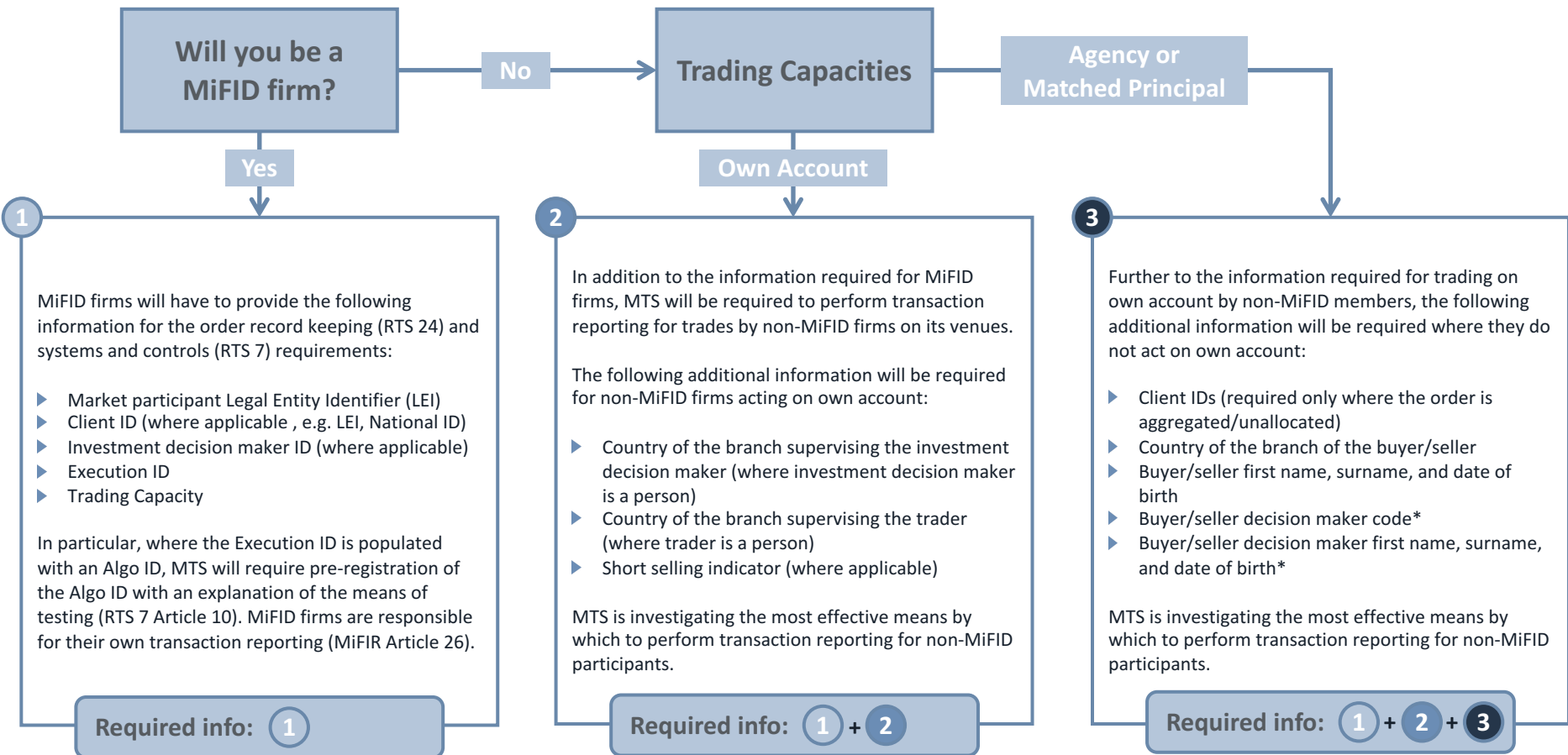
MTS Approach



Summary of information required



Regulatory status and trading capacity trigger additional information requirements, as summarised below



*These fields are only required when the decision maker is acting under the power of representation. According to the ESMA guidelines on Transaction reporting, order record keeping and clock synchronisation under MiFID II, "The power of representation refers to a third party or third parties that are external to the client and have been granted authority to take investment decisions on behalf of the client". Please refer to these guidelines for further details.



Summary of information supported **MTS**TM

Pre-Registration Required	Field	OMS Users: In (Release) / Out (Execution)	Venue Blotter
Yes	Legal Entity Identifier (LEI) of market participant	-	Y
Yes	Client ID (where applicable)	IN	Y
Yes	Investment decision ID (where applicable)	IN	Y
Yes	Execution ID	IN	Y
-	Trading Capacity	IN	Y
Yes	Country of the branch supervising the investment decision maker	-	-
Yes	Country of the branch supervising the trader	-	-
-	Client IDs (where aggregation/pending provided above)*	-	-
-	Country of the branch of the buyer/seller*	-	-
-	Buyer/seller first name, surname, and date of birth*	-	-
-	Buyer/seller decision maker code*	-	-
-	Buyer/seller decision maker first name, surname, and date of birth*	-	-
-	Venue MIC	OUT	Y
-	Waiver Flag	OUT	Y

*MTS is investigating the most effective means by which to collect these fields in order to perform transaction reporting for non-MiFID participants.

Focus on Algo & National IDs

New FIX protocol fields



Expected additional fields to be added to the FIX specifications to support the submission of Algo and National IDs*:

BV

BV - Additional Fields in SDP & FIX to support Algo & National ID submission

Member	Short code 1 – Investment Decision	Short code 2 – Order Execution	Short code 3 – Client
End User	Investment decision maker ID short code	Order Execution ID short code	Client ID short code

RFCQ requests and Executable Orders sent to the market with **UNREGISTERED** short codes will be **REJECTED**.

*Subject to confirmation when the protocol specifications are published.

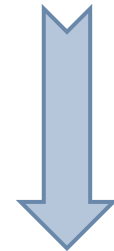
Info registration tool (1/4)



Super User profile

- ▶ Dedicated user profile to ensure only permissioned persons are able to input information
- ▶ Registered information stored securely by MTS
- ▶ MTS working closely with OMS providers and ISVs to ensure efficient transmission and receipt of information on orders, RFQs, and trades

Quote and order messages (and edits) sent to the market with UNREGISTERED short codes will be REJECTED



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Info registration tool (2/4)



Additional information will be required depending on the ID Type Definition and regulatory status of the member firm

Information submission tool in Market GUI:

- ▶ Register Algo, Client, and National IDs and define roles (e.g. Execution ID)
- ▶ Map short codes to full ID Codes (“long codes”) to reduce latency and avoid transmission of sensitive information in order/quote messages
- ▶ Optional ID Name display for ease of selection and readability



CMF BV



ID Type Definition	ID Type	ID Code	ID Code (Short)	ID Name display
Algo ID <input type="radio"/>	Execution ID <input checked="" type="checkbox"/>	GB19760223JOHN#SMITH	a1b2	John Smith
National ID <input checked="" type="checkbox"/>	Investor ID <input checked="" type="checkbox"/>	<input type="text"/> Use as ID Code (Short)?		
LEI <input type="radio"/>	Client ID <input type="radio"/>			

Note: **Investor ID** refers to **Investment decision within firm** (See: RTS 22 Annex I Table 2 Field 57, RTS 24 Annex Table 2 Field 4)

Info registration tool (3/4)



Additional information will be required depending on the ID Type Definition and regulatory status of the member firm

ID Type Definition	ID Type	ID Code	ID Code (Short)	Algo cert.	Algo ID Tested
Algo ID <input checked="" type="checkbox"/>	Execution ID <input checked="" type="checkbox"/>	algo11	exa1	... <input checked="" type="checkbox"/>	MTS test environment
National ID <input type="checkbox"/>	Investor ID <input type="checkbox"/>	<input type="text"/> Use as ID Code (Short)?			
LEI <input type="checkbox"/>	Client ID <input type="checkbox"/>				



Self-certification of having tested algorithms and explanation of the means of testing must be provided

ID Type Definition	ID Type	ID Code	ID Code (Short)	Algo cert.	Algo ID Tested
Algo ID <input checked="" type="checkbox"/>	Execution ID <input checked="" type="checkbox"/>	algo12	algo12	... <input checked="" type="checkbox"/>	Proprietary test env.
National ID <input type="checkbox"/>	Investor ID <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> Use as ID Code (Short)?			
LEI <input type="checkbox"/>	Client ID <input type="checkbox"/>				

Info registration tool (4/4)



Additional information required from Non-MiFID firms:

For each National ID registered by Non-MiFID firms, a two letter country code (ISO 3166-1 alpha-2 format) must be provided associated with:

- ▶ Country of the branch responsible for the person making the investment decision
- ▶ Country of the branch supervising the person responsible for the execution

CMF BV

ID Type Definition	ID Type	ID Code	Country	Order Execution	Country Investment Dec.
Algo ID	<input type="radio"/>	Execution ID <input checked="" type="checkbox"/>	GB19760223JOHN#SMITH	...	FR
National ID	<input checked="" type="checkbox"/>	Investor ID <input checked="" type="checkbox"/>	<input type="text"/>	Use as ID Code (Short)?	FR
LEI	<input type="radio"/>	Client ID <input type="radio"/>			

Focus on ID formats

Algo ID, National ID, and Legal Entity Identifiers (LEI)



MiFID II (RTS 22, RTS 24) are highly prescriptive in terms of formatting:

ALGO ID up to 50 alphanumerical characters

➔ e.g. algo123

NATIONAL ID up to 35 alphanumerical characters, depending on nationality

➔ e.g. GB19760223JOHN#SMITH, see example on the right

LEI 20 alphanumerical characters, issued by national numbering agencies

➔ e.g. 213800OANOWGT2KW8O63

Personal details

Name	Country	Date of Birth
John Smith	United Kingdom	23/02/1976



RTS 22 Annex II Identifiers

Country	Country Code	Identifier
United Kingdom	GB	CONCAT



ID Code

ID Type	ID Code
National ID	GB19760223JOHN#SMITH



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