



# Order Record Keeping

Version 2.0

10 January 2020

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## Amendments to the document Version 2.0

- Records DA are no longer admitted to modify orders (page 7).
- Market and dates fields functionality has been erased from RI records (page 9). Fields "Starting\_Date", "Ending\_Date" and "TrdnVn" have not to be filled anymore (page 9).
- Changes in RI records registrations and deregistrations (page 9).
- ORK historical area management: Historical area and Historic ORK. Records admitted and rejected (page 6).
- SHCD files: Short codes sent to the historical area (page 26).
- Limit of number of messages at the response files (page 20).

# 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
<b>Events affecting the order</b>	
21	New order, order modification, order cancellation, order rejections, partial or full execution
<b>Type of order</b>	
22	Order type
23	Order type classification
<b>Prices</b>	
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
<b>Order instructions</b>	
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
<b>Trading phases, indicative auction price and volume</b>	
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.
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
<b>Validity period and order restrictions</b>	
10	Validity period
11	Order restriction
<b>Identification of the order</b>	
17	Order book code
<b>Events affecting the order</b>	
21	New order, order modification, order cancellation, order rejections, partial or full execution
<b>Order type</b>	
22	Order type
<b>Prices</b>	
24	Limit price
25	Additional limit price
26	Stop price
<b>Order instructions</b>	
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

**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.

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:**

- 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. RC record, by order number

These records are grouped by 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

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

RC record, by order number

### ORK historical Database Management

ORK historical data management consists in a database partition, with the aim to be more efficient and rationalize the data received from the market members and so, to improve daily and historical orders consolidation.

The ORK database is divided in two areas:

- **Working area:**
  - Current and previous month orders, independently they are completed or not.
  - Live orders from any period, completed or not.
  - Orders from any period not fully informed yet.
- **Historic area:**
  - Orders previous to the first day of the previous month, correctly informed and not alive.

To achieve the above, each end of month an orders and short codes movement to Historic ORK will take place:

- **Orders:** Those orders previous to the first day of the previous month, not alive and correctly informed will be moved to Historic ORK.
- **Short codes:** Those short codes used at least once in an order sent to the Historic ORK, will be moved to the Historic ORK. It will be informed through SHCD files.

The examples below show the order's movement that would be done at 31 July 2019:

1. Order before the first date of the previous month that is not complete

ORDER NUMBER	ORDER DATE	ALIVE	CORRECT	HISTORIC
100000001	25/06/2019	NO	NO	<b>NO</b>

The order 100000001 both for being later than the first day of the previous month and for not being fully informed, **it will not be sent to the historical area, and so it will remain at the working area.**

2. Order after the first date of the previous month that is not complete

ORDER NUMBER	ORDER DATE	ALIVE	CORRECT	HISTORIC
100000002	10/05/2019	NO	NO	<b>NO</b>

The order 100000002 although is earlier than the current month, it is not complete, **it will not be sent to the historical area, and so it will remain at the working area.**



3. Order at the current month that has been correctly informed

ORDER NUMBER	ORDER DATE	ALIVE	CORRECT	HISTORIC
100000003	25/07/2019	NO	YES	<b>NO</b>

The order 100000003 although is complete, as it is later than the first day of the previous month, **it will not be sent to the historical area, and so it will remain at the working area.**

4. Order before the first date of the previous month that is correctly informed and is not alive.

ORDER NUMBER	ORDER DATE	ALIVE	CORRECT	HISTORIC
100000004	17/03/2019	NO	YES	<b>YES</b>

The order 100000004 is correctly informed and as it is not earlier than the previous and the current month and it is not alive, **it will be sent to the historical area.**

5. Order before the first date of the previous month that is correctly informed and is **alive in the market.**

ORDER NUMBER	ORDER DATE	ALIVE	CORRECT	HISTORIC
100000005	17/03/2019	<b>YES</b>	YES	<b>NO</b>

The order 100000005 although is earlier than the first date of the previous month and it is fully correctly informed, it is still alive so **it will not be sent to the historical area, and so it will remain at the working area.**

6. Order before the first date of the previous month that is not complete and is **alive in the market.**

ORDER NUMBER	ORDER DATE	ALIVE	CORRECT	HISTORIC
100000006	21/05/2019	<b>YES</b>	NO	<b>NO</b>

The order 100000006 although is earlier than the first date of the previous month, both for not being fully correctly informed and for being still alive, **it will not be sent to the historical area, and so it will remain at the working area.**

## 2. Types of record

### Changes in records CT, DW and EW respect to the previous version

In case that market members use short codes records (CT, DW or EW) to report order data, there must be considered the new RI records functionality, which is a simplification compared to the previous version:

- **“Starting\_date” and “Ending\_date” fields’ functionality have been erased** from RI records in order to get higher simplicity in data sending and management.

Dates functionality elimination implies that data sent through records CT, DW or EW will have perpetual validity.

- **“TrdnVn” field (market MIC code) functionality has been erased.** Short codes data sent through records CT, DW or EW will apply to all BME markets (having the same effect as when the field was filled with “\*” in the previous version). The structure of the records remains unchanged, so this field must be blank (any other value will not be used).

Consequently, the information sent through CT, DW or EW records implies **registering the information for all BME markets.**

- The information may be removed as is currently done for the records at the working area, by sending the corresponding CT, DW or EW registration off. The cancellation implies eliminating the information associated to the short code, leaving it empty without information.

Only deregistration requests can be done on short codes (CT, DW or EW) not used in orders located in the Historic ORK. Requests for deregistration of RI records used in the Historic ORK will be rejected.

- Short codes moved to Historic ORK will be reported through SHCD files.
- **Elimination of unnecessary records:** Every end of the month will be deleted those RI records that, sent in the last two months, which have never been used in any order.

### CT record- Client

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

They will have the following structure:

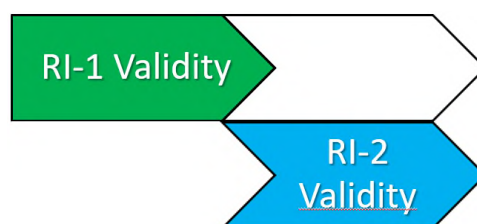
No.	Field	Information	Description
1	TypeReg	RI	Type of identification code record.
2	Action	A-Registration/ Adding ownership B-Deregistration	Indicates the function of the RI record submitted.
3	ExctgPty	Legal entity identifier (LEI)	Executing entity LEI.
4			
5			
6			
7	Identifier		Short code of client 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 identifier	If PType=LEI. Client LEI
11	Prsn_SchmeNm	NIDN, CCPT, CONCAT	If PType=Prsn. ID type for natural person NIDN = National ID CCPT = Passport CONCAT = CONCAT code
12	Prsn_Id	National_ID	If PType=Prsn. Client identification code.

First time a RI-CT record is submitted means a registration since the beginning of ORK until 31-12-9999 for all BME markets

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. 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.

If a RI-CT short code has been sent previously in a different file, the new RI-CT will replace previous RI-CT information since the date new RI-CT is submitted until 31-12-2019



If information submitted in a RI-CT record has already been registered in the system for that short code, that is, same short code with the same information has been submitted previously, new RI-CT will be rejected

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, and, subsequently, a registration with the new information associated to the short code. This means a full deregistration of this short code, deleting client information that has been associated to orders. Then, the new registration RI-CT will be associated to all orders since the beginning of the ORK until 31-12-9999, as it will be treated like if it were first information submission for this 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 the 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.

**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.

They will have the following structure:

No.	Field	Information	Description
1	TypeReg	RI	Type of identification code record.
2	Action	A-Registration/ Modification B-Deregistration	Indicates the function of the RI record submitted.
3	ExctgPty	Legal entity identifier	LEI of the entity that enters the order.
4			
5			
6			
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 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_Sc hNm	NIDN, CCPT, CONCAT	If Dcsn_typePrsn='P'. National ID code type. NIDN = National ID CCPT = Passport CONCAT = CONCAT code
12	Dcsn_Othr_Id	National_ID	If Dcsn_typePrsn='P'. National ID of transaction decision maker within the member.

First time a RI-DW record is submitted means a registration since the beginning of ORK until 31-12-9999 for all BME markets

If information submitted in a RI-DW record has already been registered in the system for that short code, that is, same short code with the same information has been submitted previously, new RI-DW will be rejected

To modify the decision maker information of all the orders associated with a short code, it will be necessary to send a RI-DW record with the field Action=B and, subsequently, a registration with the new information associated to the short code. This means a full deregistration of this short code, deleting decision maker information that has been associated to orders. Then, the new registration RI-DW will be associated to all orders since the beginning of the ORK until 31-12-9999 as it will be treated like if it were first information submission for this short code.

Deregistration of a RI-DW record whose short code has been moved to the historical database will be rejected.

**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/ Modification B- Deregistration	Indicates the function of the RI record submitted.
3	ExctgPty	Legal entity identifier	LEI of the entity that enters the order.
4			
5			
6			
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 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_Sc hNm	NIDN, CCPT, CONCAT	If Dcsn_typePrsn='P'. National ID code type NIDN = National ID CCPT = Passport number 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.

First time a RI-EW record is submitted means a registration since the beginning of ORK until 31-12-9999 for all BME markets

If information submitted in a RI-EW record has already been registered in the system for that short code, that is, same short code with the same information has been submitted previously, new RI-EW will be rejected

To modify the executor information of all the orders associated with a short code, it will be necessary to send a RI-EW record with the field Action=B and, subsequently, a registration with the new information associated to the short code. This means a full deregistration of this short code, deleting executor information that has been associated to orders. Then, the new registration RI-EW will be associated to all orders since the beginning of the ORK until 31-12-9999 as it will be treated like if it were first information submission for this short code.

Deregistration of a RI-EW record whose short code has been moved to the historical database will be rejected.

**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.

	Field	Information	Description	
<b>Trade Data</b>	1	TypeReg	RC	Type of record associated to the correction of a specific order
	2	Action	A- Registration /Modification B- Deregistration	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	Type of order, determines validation of field OrderID
			QUO – Quote Order	
			BLO – Agreed price trade	
	6	OrderID	RFQ – Request for quote	Type of order, determines validation of field OrderID
PLV – Settlement value positions				
7	Date	YYYY-MM-DD	Date on which the order is entered	
8	BuySell	B-Buy S-Sell	Buy or sell indicator	
<b>Trade Holder</b>	9	PType	LEI, P, PNAL, AGGR, N	Type of identification for the buyer or the seller: - LEI - P: Physical person - PNAL: The client of the order is unknown - AGGR: It is an aggregate order - 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 A-Algorithm 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
Execution within firm	17	Exct_typePrsn	P-Person A-Algorithm N-There is no execution within the firm	Type of execution within the firm identification
	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
Additional Data	21	DEA	1,0 (True/False)	Direct Electronic Access indicator
	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 within same file, 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. Clients' information submitted in RC records within different files, last information will replace information sent in the previous file.

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 decision maker or executor is submitted in several RC records, the last decision maker/ executor will replace the previous one.

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 RC record deregistration 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).

Registration a deregistration RC records can only be submitted for orders that are in the working area. RC records submitted to orders that are in the historical database will be rejected.



### 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, files sent after the starting of consolidation process will be considered as sent next day, so its information will be treated in next day consolidation.

### 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 in 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:

<b>Decimal</b>	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.
<b>Date</b>	Fields to specify dates and with the format YYYY-MM-DD.
<b>Datetime</b>	Used to specify dates and time, using the ISO 8601 format YYYY-MM-DDThh:mm:ss.ffffffZ.
<b>Char</b>	Text fields that must be completed with the specified number of characters. Spaces must be inserted to the right if there are fewer characters.
<b>Varchar</b>	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 files. 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 generated in a few minutes 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\_MD5**

- 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, ORVB and SHCD.**
- YYYYMMDD (8) → File generation date.
- SEQ (3) → Three-digit sequence. Example: 001
- EXT (3) → Extension of the file: **CSV**
- 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.

#### Size limitation for ORK and ORV outbound files

Response files will show up to 10.000 messages. If amount of response errors overcome this limit, last record of outbound files will show the following message, meaning this limit has been overcome and there are messages not showed:

*"There are errors that are not displayed. Number of messages has exceeded the limit"*

**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	<b>TypeReg</b>	FI	Record type
2	<b>Source</b>		ORK: BME ORK system
3	<b>CreDT</b>		Date sent
4	<b>ExctgPty</b>	LEI	Market LEI
5	<b>FileName</b>		Name of INB file sent by the member
6	<b>Sts</b>		Status (Table 1)
7	<b>TtINbOfRcrds</b>		Total registers
8	<b>stACTP</b>		Number of accepted transactions
9	<b>stPDNG</b>		Number of pending transactions
10	<b>TRSJCT</b>		Number of rejected transactions
11	<b>TRSCVD</b>		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'

<b>CON-078</b>	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.
<b>CON-164</b>	The format of the seller code is incorrect
<b>CON-168</b>	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
<b>CON-297</b>	Only one of the following values can be populated: 'DEAL', 'MTCH', 'AOTC'
<b>CON-368</b>	The reported value should be a string of 4 characters (letters or numbers). /
<b>CON-573</b>	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
<b>CON-574</b>	The format of the executing person code is incorrect
<b>CON-577</b>	If person national identifier is used, only one of the following values can be populated: 'NIDN', 'CCPT', 'CONCAT'
<b>CON-578</b>	In case an algorithm identifier is used, the following characters are only allowed: capital Latin letters (A-Z), numbers (0-9)
<b>CON-590</b>	The national identification code does not include valid country code
<b>CON-591</b>	The format of the executing person code is incorrect
<b>CON-597</b>	If person national identifier is used, only one of the following values can be populated: 'NIDN', 'CCPT', 'CONCAT'
<b>CON-598</b>	In case an algorithm identifier is used, the following characters are only allowed: capital Latin letters (A-Z), numbers (0-9)
<b>CON-807</b>	Only 'B' or 'S' values allowed (Buy/Sell)
<b>CON-857</b>	Only one of the following values can be populated: 'LEI', 'MIC', 'P', 'INTC'
<b>CON-867</b>	Only one of the following values can be populated: 'LEI', 'P'
<b>CON-897</b>	Data should be one of the following: P=Person; A=Algorithm
<b>CON-907</b>	The format should be one of the following: P=Person; A=Algorithm
<b>CON-917</b>	Only 'A' or 'B' values allowed (A-Registration/B-Deregistration)
<b>CON-927</b>	Only one of the following values can be populated: 'LEI', 'P', 'PNAL', 'AGGR', 'N'
<b>CON-937</b>	Only one of the following values can be populated: 'ORD', 'QUO', 'BLO', 'RFQ', 'PLV', 'FON'
<b>CON-950</b>	Date time must be the same or before the system date time
<b>CON-951</b>	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
<b>CON-967</b>	Only 'True' or 'False' values allowed
<b>CON-977</b>	Only 'True' or 'False' values allowed
<b>CON-987</b>	Only 'CT', 'DW' or 'EW' values allowed
<b>CTR-046</b>	Submitting / Executing LEI not allowed by BME. Please check registration
<b>CTR-070</b>	LEI XXX is not valid
<b>CTR-071</b>	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
<b>CTR-160</b>	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.
<b>CTR-161</b>	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
<b>CTR-362</b>	Not authorised MIC



<b>CTR-701</b>	Deregistration Action. No Registration record was found or it was rejected
<b>CTR-761</b>	Field should be a text string of no more than 10 characters
<b>CTR-763</b>	Short code. RI short code cannot be a number below 100
<b>CTR-764</b>	Field should not be greater than 4.294.967.295
<b>CTR-765</b>	Wrong client short code, please submit a RC record to provide client information
<b>CTR-766</b>	The RI register has been used in orders previous to the current Data Base
<b>CTR-869</b>	This client has already been submitted
<b>CTR-900</b>	Short code not allowed, it must be above 100
<b>CTR-900</b>	Short code not allowed, it must be above 100
<b>CTR-911</b>	Deregistration Action. No Registration record was found or it was rejected
<b>CTR-955</b>	Date must be a trading date
<b>CTR-956</b>	Initial date cannot be after Final Date
<b>DAR-001</b>	The DA register has been used in orders previous to the current Data Base
<b>DWR-765</b>	Wrong decision maker short code, please submit a RC record to provide decision maker information
<b>DWR-766</b>	The RI register has been used in orders previous to the current Data Base
<b>DWR-909</b>	This decisor has already been submitted
<b>EWR-765</b>	Wrong executor short code, please submit a RC record to provide executor information
<b>EWR-766</b>	The RI register has been used in orders previous to the current Data Base
<b>EWR-899</b>	This ejecutor has already been submitted
<b>NOORDE RS</b>	No order has been submitted to the market
<b>STA-001</b>	File containing the report has an incorrect filename.
<b>STA-002</b>	File containing the report is corrupted.
<b>STA-004</b>	Error Parser CSV. Check that limiters and the file is codified as UTF8
<b>STA-005</b>	Error in the de-encryption. Check you have used the BME public key.
<b>STA-006</b>	File containing the report has an incorrect filename. LEI of the member sending the file
<b>STA-007</b>	File containing the report has an incorrect filename. LEI of the member on behalf of which the file is being sent
<b>STA-008</b>	File containing the report has an incorrect filename. File type
<b>STA-009</b>	File containing the report has an incorrect filename. File communication date
<b>STA-010</b>	File containing the report has an incorrect filename. Sequence
<b>STA-011</b>	File containing the report has an incorrect filename. File extension DAT / XML
<b>STA-012</b>	File containing the report has an incorrect filename. File extension gpg
<b>STA-013</b>	File containing the report has an incorrect filename. MD5
<b>STA-014</b>	File containing the report has an incorrect filename. INBOUND
<b>STA-015</b>	File containing the report has an incorrect filename. Content zip file
<b>STA-016</b>	File containing the report has an incorrect filename. File extension zip
<b>STA-045</b>	ExctgPty LEI code cannot be different from filename ExctgPty LEI code
<b>STA-971</b>	Wrong register type
<b>STA-990</b>	Record type does not exist
<b>STA-991</b>	Number of fields in your register do not match with the requested.
<b>STR-925</b>	RC record with no information added
<b>STX-040</b>	ExctgPty. Field is mandatory
<b>STX-042</b>	Field should be a text string of no more than 20 characters

<b>STX-070</b>	Client identification. Field is mandatory
<b>STX-072</b>	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.
<b>STX-073</b>	Field should be a text string of no more than 6 character
<b>STX-160</b>	Client identification. Field is mandatory
<b>STX-162</b>	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.
<b>STX-163</b>	Field should be a text string of no more than 6 character
<b>STX-292</b>	Field should be a text string of no more than 4 characters
<b>STX-360</b>	MIC code. Field is mandatory
<b>STX-362</b>	Field should be a text string of no more than 4 characters
<b>STX-572</b>	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.
<b>STX-573</b>	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).
<b>STX-592</b>	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.
<b>STX-593</b>	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). /
<b>STX-760</b>	Shortcode. Field is mandatory.
<b>STX-762</b>	The reported value should be a string of 20 characters
<b>STX-800</b>	BuySell. Field is mandatory.
<b>STX-802</b>	Field should be a text string of no more than 1 characters
<b>STX-850</b>	Action. Field is mandatory.
<b>STX-852</b>	Field should be a text string of no more than 4 characters
<b>STX-862</b>	Field should be a text string of no more than 4 characters
<b>STX-892</b>	Field should be a text string of no more than 1 characters
<b>STX-900</b>	Decision maker type. Field is mandatory.
<b>STX-902</b>	Field should be a text string of no more than 1 characters
<b>STX-922</b>	Field should be a text string of no more than 1 characters
<b>STX-930</b>	Order type. Field is mandatory.
<b>STX-932</b>	Field should be a text string of no more than 3 character
<b>STX-940</b>	OrderID. Field is mandatory.
<b>STX-942</b>	Field should be a text string of no more than 12 character
<b>STX-950</b>	Date. Field is mandatory.
<b>STX-952</b>	Field must be populated with a valid date in the following format: YYYY-MM-DD
<b>STX-962</b>	Field should be a text string of no more than 1 character

<b>STX-972</b>	Field should be a text string of no more than 1 character
<b>STX-980</b>	Shortcode type. Field is mandatory.
<b>STX-982</b>	Field should be a text string of no more than 2 characters
<b>STR-926</b>	There are errors that are not displayed. Number of messages has exceeded the limit of 10.000

### 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	<b>TypeReg</b>	VB	Record type.
2	<b>Date</b>	YYYY-MM-DD	Date of the order whose information is uncompleted. (only for RC)
3	<b>Tipo_Err</b>	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 has been used in an order and no additional information has been provided in a RC record.VA: order has coherence error</li> </ul>
4	<b>Tipo_RI</b>	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	<b>Tipo_Ord</b>	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	<b>BuySell</b>	B-Buy 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	<b>Id</b>		Number of order if it is RC and short code of the record if it is RI.
8	<b>ErrCd</b>		Error Code.
9	<b>ErrDscrptn</b>		Description of the Error.

### SHCD files

SHCD files will be generated at the beginning of each month and placed in filesout folder of the SFTP.

This file will inform short codes that have been moved to historical area.

Nº	Campo	Dato	Descripción
1	<b>ExctgPty</b>	Código LEI	Código LEI de la entidad que introduce la orden
2	<b>SubRegistro</b>	CT/ DW/ EW	Indica el tipo de código corto que se muestra en el siguiente campo: CT=Cliente DW=Decisor EW=Ejecutor
3	<b>Identificador</b>		Código corto que se ha enviado al área histórica
4	<b>Fecha</b>	aaaaMMdd	Fecha en la que se realiza el movimiento al área histórica
5	<b>Tipo</b>	H/ D	Cambio de situación del código corto: <b>H:</b> el código corto se ha movido al área histórica <b>D:</b> el código corto se ha eliminado por no haber sido utilizado en ninguna orden en los últimos dos meses

## 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 Historic ORK, (see "ORK historical management" within the section 1) 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	Order holder
4	Investment decision within the firm
5	Execution within the firm
7	Trading capacity
8	Liquidity provision activity

### Method of action

To amend any data that can be modified, market member must send a new registration RC record.

An RC record with data of the holder will replace the ownership of another RC if it has been sent in a **different file**. In case the holders are sent in RC records in the **same file**, co-owners will be added to the order.

The data of decision makers and executors sent in an RC will replace the previous ones, whether they are sent in the same file as in a new one.

Sending an RC record with the Action = "B" field will delete all the information sent through RC records for that order.

In the event that, for the same order, short codes have been provided with their corresponding CT, DW and EW records, and data has also been provided by means of

an RC record, the RC record data will always prevail over any information obtainable from the shorts codes.

RC records cannot modify or cancel information on orders that are in the Historic ORK. In the event that an RC record is associated with an order that is in the Historic ORK it will be rejected.

## 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	Blank	
5	Blank	
6	Blank	
7	Identifier	120
8	SubRegister	DW
9	Dcsn_typePrsn	<i>P</i>
10	Dcsn_Algo	
11	Dcsn_Othr_SchNm	<i>CONCAT</i>
12	Dcsn_Othr_Id	<i>US19770912JON#DEWIT</i>

No.	Field	RI-EW RECORD
1	TypeReg	RI
2	Action	A
3	ExctgPty	549300ATRSCPTXGNEI40
4	Blank	
5	Blank	
6	Blank	
7	Identifier	125
8	SubRegister	EW
9	Exct_typePrsn	<i>P</i>
10	Exct_Algo	
11	Exct_Othr_SchNm	<i>CONCAT</i>
12	Exct_Othr_Id	<i>HU19800413ADAM#JONES</i>

*\*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	Blank	
5	Blank	
6	Blank	
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	Blank	
5	Blank	
6	Blank	
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	Blank	
5	Blank	
6	Blank	
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	Blank	
5	Blank	
6	Blank	
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	Blank	
5	Blank	

6	Blank	
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 X MAD 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	Blank	
5	Blank	
6	Blank	
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	Blank	
5	Blank	

6	Blank	
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 X MAD of 1000 lots for Client A. Client A has conferred power of representation to the advisory entity E. The investment services entity X has sent 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 B-Deregistration
3	4	ExctgPty	Char	20	Executing entity LEI
4		Blank	Char		
5		Blank	Date		
6		Blank	Date		
7		Id	Char	20	ClientID when the subregister is CTDCsnwFirm when the subregister is DW type (all) ExctwFirm when the subregister is EW type (all)
8		SubRegister	Char	2	Indicates type of record preceded by this header: CT, DW or EW

### SubRegister CT of Clients Format

Nº	RTS 22	Field	Type	Long	Information
1		SubRegister	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_SchmeNm	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 22	Field	Type	Long	Information
1		SubRegister	Char	2	DW
2	57	Dcsn_typePrsn	Char	1	P-Person A-Algorithm
3	57	Dcsn_Algo	Char	50	If Dcsn_typePrsn='A'. Code of algorithm taking the transaction decision 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 22	Field	Type	Long	Information
1		SubRegister	Char	2	EW
2	59	Exct_typePrsn	Char	1	P-Person A-Algorithm 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_Sch Nm	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

	Field	Type	Long	Description	
<b>Trade Data</b>	1	TypeReg	Char	2	RC
	2	Action	Char	1	A- Registration/Modification B- Deregistration
	3	ExctPty	Char	20	Legal Entity Identifier
	4	TrdnVn	Char	4	MIC
	5	OrderType	Char	3	ORD – Simple Order QUO – Quote Order BLO – Agreed price trade RFQ – Request for quote PLV – Settlement value positions FON – Funds trading
	6	OrderID	Char	52	
	7	Date	Char	10	YYYY-MM-DD
	8	BuySell	Char	1	B-Buy S-Sell
<b>Trade Holder</b>	9	PType	Char	4	LEI, P, PNAL, AGGR, N
	10	LEI	Char	20	Legal entity identifier
	11	Prsn_SchmeNm	Char	6	NIDN, CONCAT
	12	Prsn_Id	Char	35	National_ID
<b>Decision within firm</b>	13	Dcsn_typePrsn	Char	1	P-Person A-Algorithm 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
<b>Execution within firm</b>	17	Exct_typePrsn	Char	1	P-Person A-Algorithm 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)