

# **MiFID II Transaction Reporting**

**External File Specification for Exchange Members** 

January 2018

Version 1,8



#### Revisions

Version	Date	Description of changes	
1,1	10 Jul 2017	Initial Publication	
1,2	4 August 2017	Updated derivation of RTS Field #3, and added a note to the appendix for RTS Field #40	
1,3	5 October 2017	Updated SECTION 3.2.2 file name convention for transaction and stats file	
1,4	26 October 2017	Added: footer for Report Status, note regarding the approach for reporting the price on trades that is the result of a strategy and clarified all prices is reported in major currency.	
1,5	15 November 2017	Added two new fields for Non-MiFID Investment Firms to submit specific types of transaction updates after they have been initially reported to the appropriate NCA.	
1,6	13 December 2017	Update to SECTION 4.12 to show the Quantity currency (Field 31) will be null because all quantity is in UNITS and the Price currency (Field 34) will be null for the STIR's product since their price is in Basis Points.	
1,7	19 December 2017	Update to Section 3.1.1 File availability times.	
1,8	5 February 2018	Update to Section 3.3.1 added contact information for members who need access to historical files.	

This document (including any enclosures and attachments) has been prepared for the exclusive benefit of the Members and Customers of ICE, and solely for information purposes and the purposes of providing assistance in relation to MiFID II and the transaction reporting requirements contained therein.

Recipients should consult with their legal and any other advisors they deem appropriate in determining how to address the MiFID II legislation and the reporting requirements in their particular circumstances. For the avoidance of doubt, neither ICE nor the





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## **MiFID II Transaction Reporting**

## **External File Specification for Exchange Members**

#### 1 Introduction

## 1.1 About MiFID II

The MiFID II<sup>1</sup>/MiFIR<sup>2</sup> legislative package that will apply from 3 January 2018 imposes a number of new regulatory requirements on EU trading venues as well as their Members regardless of location. These include but are not limited to provision of additional data to trading venues to support obligations in respect of maintaining order records as well as transaction reporting.

The transaction reporting requirements are set out in MiFIR Article 26 and its Regulatory Technical Standard No. 22<sup>3</sup>. Pursuant to these provisions, Investment Firms<sup>4</sup> shall report details of transactions they execute in financial instruments,<sup>5</sup> either on an EU venue or OTC, to the competent regulatory authority. The details of transactions executed on an EU trading venue by Non-Investment Firms<sup>6</sup> should be reported by that venue.

In addition, EU trading venues are required to keep records of all orders submitted to their markets by their members as per the Regulatory Technical Standard No. 24.7

For the purposes of transaction reporting as well as order record-keeping, ICE will not only gather additional information from but also provide additional data to its Members in particular to support Members fulfil their own transaction reporting obligations (i.e. where the member is an Investment Firm).

This document sets out the technical details of a file that will be provided to all ICE Members and their DEA clients on a daily basis.

<sup>&</sup>lt;sup>1</sup> Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments and amending Directive 2002/92/EC and Directive 2011/61/EU.

<sup>&</sup>lt;sup>2</sup> Regulation (EU) No 600/2014 of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments and amending Regulation (EU) No 648/2012.

<sup>&</sup>lt;sup>3</sup> Commission Delegated Regulation (EU) 2017/590 of 28 July 2016 supplementing Regulation (EU) No 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards for the reporting of transactions to competent authorities.

<sup>&</sup>lt;sup>4</sup> As defined by MiFID II Article 4(1)(1). Investment Firms are entities authorized as such by one of the EU National Competent Authorities.

<sup>&</sup>lt;sup>5</sup> As defined by MiFID II Article 4(1)(15).

<sup>&</sup>lt;sup>6</sup> Non-Investment Firms are firms which are not Investment Firms.

<sup>&</sup>lt;sup>7</sup> Commission Delegated Regulation (EU) 2017/580 of 24 June 2016 supplementing Regulation (EU) No 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards for the maintenance of relevant data relating to orders in financial instruments.



## 1.2 Document Purpose

This document provides technical specifications for the various files that ICE makes available to Exchange Members -- both MiFID Investment Firms, and Non-MiFID Investment Firms -- for their transaction activity in MiFID II reportable markets. The intention of the document is to provide analysts and technical staff of those entities with sufficient information to design solutions for consuming and processing the files, as they deem necessary.

#### 1.3 Document Conventions

- This document is written for the perspective of a given Exchange Member. Statements that discuss data being reported, files being provided, etc., are all relative to a single Exchange Member.
- This document assumes the reader is familiar with the following:
  - o MiFID II RTS 22
  - o ICE Identifier Admin Application
  - o MiFID II Transaction Updates

**DISCLAIMER:** To avoid future rework, the document is written in present tense.

## **1.4 FAQs**

This document goes naturally hand-in-hand with the MiFID FAQ ICE has published, located at: TBD. Updated FAQs may be published from time to time.

Some key topics to consider in the FAQ relative to this document are:

- MiFID Reportable Products
- ISINs Pertaining to ICE Products
- ICE Identifier Admin Application

ICE may also publish circulars pertaining to MiFID, which are found at the following links:

https://www.theice.com/futures-europe/circulars

https://www.theice.com/endex/circulars



# 1.5 Terms

Term	Definition
Exchanges / ICE Exchanges	Within the context of this document, unless otherwise indicated, the terms
	Exchange, Exchanges, and ICE Exchanges universally apply to the ICE MICs that have MiFID II reportable products. These are: IFEU, IFLL, IFLO, IFLX, and NDEX.
ICE Identifier Admin (IIA)	The ICE Identifier Admin application is a web-based application accessible
, ,	via WebICE, or as a standalone application. The application is a critical
	component of the solution framework ICE has developed to support the
	MiFID II regulation. It allows users to create reference points (Profiles and
	Short Codes) to the new order-level data elements required by MiFID II,
	and crucially provides for encrypting and safeguarding sensitive data values
10511	(e.g. Person Identifiers such as National ID, Passport Number, etc.).
ICEU	ICE Clear Europe. The Clearing House/Central Counterparty on all MiFID II
MA'EID I and and Eine	reportable transactions.
MiFID Investment Firm	A firm to which MiFID applies including, for some purposes only, a credit
	institution and collective portfolio management investment firm. (in full) a firm which is:
	(1) an investment firm with its head office in the EEA (or, if it has a
	registered office, that office);
	(2) a CRD credit institution (only when providing an investment service or
	activity in relation to the rules implementing the Articles referred to in
	Article 1(2) of MiFID);
	(3) a collective portfolio management investment firm (only when
	providing the services referred to in article 6(4) AIFMD or Article 6(3) of the
	UCITS Directive in relation to the rules implementing the articles of MiFID
	referred to in article 6(6) of AIFMD or Article 20 6(4) of the UCITS Directive and for a full-scope UK AIFM the rules implementing article 12(2)(b) of
	AIFMD);
	unless, and to the extent that, MiFID does not apply to it as a result of
	Article 2 (Exemptions) or Article 3 (Optional exemptions) of MiFID.
Non-MiFID Investment Firm	An Exchange Member that is not a MiFID Investment Firm
Strategy Trade	A trade involving two or more financial instruments, in some combination
	of buying and/or selling of each instrument, at a single price. Example
	strategy trades:
	Buy a Jun17/Jul17 calendar spread is:
	<ul><li>Buy Jun17</li><li>Sell Jul 17</li></ul>
	<ul><li>Sell Jul 17</li><li>Sell a Q4-17 quarter is</li></ul>
	o Sell Oct17
	o Sell Nov17
	o Sell Dec17
Strategy Parent Trade	In a strategy trade scenario, this is a single trade registered by the system
	to represent the strategy being traded, which is separate than the trades of
	each of the strategy's outright/leg markets. In the examples above, the
	system would have recorded strategy parent trades for both the





Term	Definition	
Jun17/Jul17 market, as well as the Q4-17 market.		





## 1.6 Additional References

MiFID RTS 22:

http://ec.europa.eu/finance/securities/docs/isd/mifid/rts/160728-rts-22\_en.pdf

Annex to MiFID RTS 22:

http://ec.europa.eu/finance/securities/docs/isd/mifid/rts/160728-rts-22-annex\_en.pdf

ICE Identifier Admin User Guide:

https://community.theice.com/docs/DOC-21622

MiFID II Transaction Updates:

https://community.theice.com/docs/DOC-22242

ICE Instrument List:

IFEU: <a href="https://www.theice.com/marketdata/reports/232">https://www.theice.com/marketdata/reports/232</a>

NDEX: <a href="https://www.theice.com/marketdata/reports/232">https://www.theice.com/marketdata/reports/232</a>



# 2 ICE Interpretation of MiFID II Reportable Transaction Data

## 2.1 Data That Will Be Provided/Reported

ICE provides for MiFID II Transaction Reporting of all Trade data in MiFID II reportable markets, with the following exceptions/clarifications:

- Strategy Parent Trades are not reported
- Brokered Trades are reported
- Pre-Clearing lifecycle events such as Cancelled Trades are reported.
- Post-Trade lifecycle events associated with Clearing are not reported.

## 2.2 Dual-Sided Reporting

The MiFID II Transaction Reporting requirements prescribe a dual-sided reporting format. This means that a given Transaction becomes two records when reported for MiFID II. For example, given a single Transaction with Exchange Member LEI1 as the Buyer, and Exchange Member LEI2 as the Seller, the following will be reported for MiFID II:

Buyer	Seller
LEI1	LEI for ICEU
LEI for ICEU	LEI2

ICEU will be shown as the opposing counterparty on all MiFID II Transactions from ICE.



# 3 MiFID II Exchange Member Transaction Data

## 3.1 File Availability

ICE follows a batch processing methodology for producing MiFID II Transaction data. The table below provides a basic day-by-day view of the data that is reported for each day of the week.

Trading Day	IFEU Futures MiFID II Data Provided/Reported	NDEX Futures MiFID II Data Provided/Reported
Monday	Tuesday	Tuesday
Tuesday	Wednesday	Wednesday
Wednesday	Thursday	Thursday
Thursday	Friday	Friday
Friday	Saturday	Saturday
Saturday	N/A	N/A
Sunday	N/A	N/A

#### 3.1.1 File Availability Times

The files is available between 6:00am - 09:00am GMT/BST.

#### 3.1.2 Holidays / Exchange Non-Working Days

ICE does not produce MiFID II Transaction files on Exchange Holidays, or other Exchange Non-Working days.

## 3.2 Exchange Member Files

ICE produces transaction data files for each Exchange Member on each processing day for which they have reportable activity in a MiFID II reportable market. These files are organized by:

Exchange Member Mnemonic

Exchange MIC (IFEU, IFLL, IFLO, IFLX, NDEX)

Content (Transactions)

All files are produced in CSV format.

ICE also produces "stats" files on each processing day, for each Exchange Member, for the Exchange MIC(s) for which they have MiFID II reportable activity.

For MiFID Investment Firms, the stats file provides a total number of records provided.

For Non-MiFID Investment Firms, the stats file provides a feedback mechanism to understand the status of the current days processing, as well as a summary of any outstanding reporting issues.

#### 3.2.1 File Characteristics

• The CSV files provide valid MiFID II-format data values.



- Exchange Members only receive data for their side of Transactions.
- Files are only created if they contain data.
- All CSV files are provided in compressed ".zip" format.
- There is no officially prescribed sort order to records contained in the files.

#### 3.2.2 File Names

File names have the following format:

Transaction File: T<MIC>\_MIFIDTRADES\_<mnemonic>\_<lei>\_<TradeDate>\_<Increment\_No>.csv.zip

Stats File: T<MIC>\_MIFIDSTATS\_<mnemonic>\_<lei>\_<TradeDate>\_<Increment\_No>.txt

The following matrix shows the full set of data files that could be generated for Exchange Member ABC for the January 15, 2018 processing date based on the format above.

MIC	CSV
IFEU	TIFEU_MIFIDTRADES_ABC_XYZ12345678901234567_20180115_01.csv.zip TIFEU_MIFIDSTATS_ABC_XYZ12345678901234567_20180115_01.txt
IFLL	TIFLL_MIFIDTRADES_ABC_XYZ12345678901234567_20180115_01.csv.zip TIFLL_MIFIDSTATS_ABC_XYZ12345678901234567_20180115_01.txt
IFLO	TIFLO_MIFIDTRADES_ABC_XYZ12345678901234567_20180115_01.csv.zip
	TIFLO_MIFIDSTATS_ABC_XYZ12345678901234567_20180115_01.txt
IFLX	TIFLX_MIFIDTRADES_ABC_XYZ12345678901234567_20180115_01.csv.zip
11 11 11	TIFLX_MIFIDSTATS_ABC_XYZ12345678901234567_20180115_01.txt
NDEX	TNDEX_MIFIDTRADES_ABC_XYZ12345678901234567_20180115_01.csv.zip
	TNDEX_MIFIDSTATS_ABC_XYZ12345678901234567_20180115_01.txt

#### 3.2.3 CSV File Format and Mapping

The CSV Transaction files have the following characteristics:

- The files are unix-style files with a single line-feed terminating each line.
- The files have one header row that contains the field names in the file.
- Each line of a given file is a single record.
- Each record includes representation for every MiFID II RTS 22 field, even if a field is blank/null.
- All field values are separated by a single comma character.
- String values are optionally enclosed with a starting and ending double-quote character.
- Blank values are represented only by their separator. Example of three fields where the middle field is blank: "Field 1 Value",,"Field 3 Value".
- Derived field values, e.g. instrument reference data associated with ISINs, or data values configured in IIA, all have place-holders in the file, even though these fields are expected to be blank. The placeholders provide the opportunity for the fields to be utilized in the future, without requiring a file format update.
- Fields that contain repeating values utilize a single pipe ("|") character to separate the values.



The table below provides a cross-reference between the CSV field names, and their corresponding RTS 22 field numbers/names.

#### Note:

- Fields highlighted in peach are related to Short Codes defined in the IIA application. The mapping provides the Short Code value ahead of its applicable fields, and it is shown in bold. These fields are expected to show the encrypted values for Personal Identifiable Information (PII) data (i.e., National ID, DOB, Passport#) and clear text for non PII data. If provided, the IIA Profile Id applicable for the record is also included at the end of the mapping.
- Fields highlighted in gray are instrument fields that can be derived from the Instrument Id (ISIN) provided in RTS Field 41. These fields are expected to be blank on all records. They are provided in the file as confirmation of the manner in which ICE is providing data.
- Fields highlighted in green are fields Non-MiFIDInvestment Firms can used to submit specific types of transaction updates after they have been initially reported to the appropriate NCA. Refer to the Transaction Update documentation for more information about the use of these fields in that process.

CSV	RTS 22	RTS 22 Field Name /
Field Name	Field #	Other Description
T1_Report_Status	1	Report Status
T2_Trans_Ref_Num	2	Transaction Reference Number
T3_TV_Trans_Id_Code	3	Trading Venue Transaction Identification
		Code
T4_Exec_Entity_Id_Code	4	Executing Entity Identification Code
T5_Investment_Firm_Covered_Flag	5	Investment Firm Covered By Directive
		2014/65/EU
T6_Submitting_Entity_Id_Code	6	Submitting Entity Identification Code
T7_IIA_Buyer_Short_Code	N/A	IIA Short Code for RTS fields 7 through 15.
T8_Buyer_Id_Code	7	Buyer Identification Code
T9_Buyer_Branch_Country	8	Country of the Branch for the Buyer
T10_Buyer_First_Name	9	Buyer - First Name(s)
T11_Buyer_Surname	10	Buyer - Surname(s)
T12_Buyer_DOB	11	Buyer - Date of Birth
T13_Buyer_Decision_Maker_Code	12	Buyer Decision Maker Code
T14_Buy_Decision_First_Name	13	Buy Decision Maker - First Name(s)
T15_Buy_Decision_Surname	14	Buy Decision Maker - Surname(s)
T16_Buy_Decision_DOB	15	Buy Decision Maker - Date of Birth
T17_IIA_Seller_Short_Code	N/A	IIA Short Code for RTS fields 16 through
		24.
T18_Seller_Id_Code	16	Seller Identification Code
T19_Seller_Branch_Country	17	Country of the Branch for the Seller
T20_Seller_First_Name	18	Seller - First Name(s)
T21_Seller_Surname	19	Seller - Surname(s)
T22_Seller_DOB	20	Seller - Date of Birth



CSV RTS 22 RTS 22 Field Name / Field Name Field # **Other Description** T23 Seller Decision Maker Code Seller Decision Maker Code 21 T24\_Sell\_Decision\_First\_Name 22 Sell Decision Maker - First Name(s) T25 Sell Decision Surname 23 Sell Decision Maker - Surname(s) T26 Sell Decision DOB 24 Sell Decision Maker - Date of Birth 25 T27\_Transmission\_Order\_Ind Transmission of Order Indicator T28 Transmit Firm Id Code Buyer 26 Transmitting Firm Identification Code for the Buyer Transmitting Firm Identification Code for T29 Transmit Firm Id Code Seller 27 the Seller T30 Trading Date Time 28 Trading Date Time T31\_Trading\_Capacity 29 **Trading Capacity** T32 Quantity 30 Quantity T33 Quantity Currency 31 **Quantity Currency** Derivative Notional Increase/Decrease T34 Deriv Notional Inc Dec 32 T35 Price 33 Price T36\_Price\_Currency 34 **Price Currency** T37 Net Amount 35 **Net Amount** T38 Venue 36 Venue T39\_Country\_Branch\_Membership 37 Country of the Branch Membership T40\_Up\_Front\_Payment **Up-Front Payment** T41\_Up\_Front\_Payment\_Currency 39 **Up-Front Payment Currency** T42 Complex Trade Component Id 40 Complex Trade Component Id T43 Instrument Id Code 41 Instrument Identification Code T44 Instrument Full Name 42 Instrument Full Name T45 Instrument Classification 43 Instrument Classification 44 T46 Notional Currency 1 **Notional Currency 1 Notional Currency 2** T47\_Notional\_Currency\_2 45 T48 Price Multiplier 46 Price Multiplier T49 Underlying Instr Code 47 **Underlying Instrument Code** T50\_Underlying\_Index\_Name 48 **Underlying Index Name** T51 Term Of Underlying Index 49 Term of the Underlying Index 50 T52 Option Type **Option Type** 51 T53 Strike Price Strike Price T54 Strike Price Currency 52 Strike Price Currency T55 Option Exercise Style 53 Option Exercise Style T56\_Maturity\_Date 54 Maturity Date T57\_Expiry\_Date 55 **Expiry Date** T58\_Delivery\_Type 56 **Delivery Type** N/A T59 IIA Firm Investment Decision Short Code IIA Short Code for RTS fields 57 through T60 Invest Decsn Wthn Firm 57 **Investment Decision Within Firm** 



CSV	RTS 22	RTS 22 Field Name /
Field Name	Field #	Other Description
T61_Ctry_Brnch_Resp_Prsn_Inv_Decsn	58	Country of the Branch Responsible for the
		Person Making the Investment Decision
T62_IIA_Firm_Execution_Short_Code	N/A	IIA Short Code for RTS fields 59 through 60.
T63_Execution_Within_Firm	59	Execution Within Firm
T64_Ctry_Brnch_Sprvsng_Prsn_Resp_Exec	60	Country of the Branch Supervising the
		Person Responsible for the Execution
T65_Waiver_Ind	61	Waiver Indicator
T66_Short_Selling_Ind	62	Short Selling Indicator
T67_OTC_Post_Trade_Ind	63	OTC Post-Trade Indicator
T68_Commodity_Deriv_Ind	64	Commodity Derivative Indicator
T69_Securities_Financing_Trans_Ind	65	Securities Financing Transaction Indicator
T70_IIA_Profile_ID	N/A	IIA Profile Id applicable for this Trade
		record
		Optional, so may not be present
T71_Orig_Trans_Ref_Num	N/A	This field will show the original
		T2_Trans_Ref_Num for transactions that
		are part of an Allocation Update scenario.
		For other transactions, the field shows the
	21.6	same value as T2_Trans_Ref_Num.
T72_Trans_Update_Scenario	N/A	Is always blank. Refer to the Transaction
		Update documentation for more
		information about the use of this field in
		that process.

**DISCLAIMER:** The CSV files produced by the Exchanges will be in accordance with RTS 22 documentation published by ESMA. MiFID Investment Firms that choose to utilize the Exchange-provided data should undertake their own checks to ensure the format, and validity of the data before submission to an NCA and/or ESMA.

## 3.2.4 Stats File Format and Mapping

The stats file is a feedback mechanism for Exchange Members that receive .

The records in the file follow a basic tag/value structure of the format:

<tagname> = <value>

The following table outlines the fields included in this file.

Field Name Description
------------------------





Example stats file content:

**TBD** 

**NOTE:** Exchange Members should have the expectation that ICE may choose to add additional statistics to this file at any time. The file is fundamentally intended for human consumption. That said, ICE does intend to keep the tag names unique (which does not guarantee that a tag name will not change), and those can therefore be used as a means to retrieve data elements from the file systematically without relying on a given value always being on the same line of the file.

## 3.3 Retrieving Files

All files described in this document are available via the Member's MFT Folder. The MFT MIFID Service allows Members to download the transaction reports published by the Exchange. All files described in this document are available via the Member's /mifid/reports/transaction Folder. The transaction directory contains the most recent generated transaction files. Members that need access to the MiFID MFT Service should complete a MIFID MFT request form.

#### 3.3.1 Historical File Availability

The MFT folder has files available for the last 14 calendar days. Members that need access to files older than 14 calendar days please contact support@theice.com.

#### 3.3.2 Automated File Download

The ICE MFT solution supports automated file download.



## 4 Appendix A: MiFID II Field Level Notes

This section does not cover all MiFID II reportable data elements. Instead, it calls attention to specific items to aid Exchange Members in understanding ICE's approach to those items.

## 4.1 Report Status (RTS Field #1)

The status of 'NEWT' in Field 1 is used for a transaction not yet reported and for a correction of an inaccurate transaction report following a cancellation of the original transaction report.

The status of 'CANC' in Field 1 is used to cancel transaction reports that contain errors before making a replacement transaction report.

## 4.2 Trading Venue Transaction Id (RTS Field #3)

The Exchange will provide a concatenated value using the date and time of the trade, along with the Exchange Deal Id and Market Id. The three components of the concatenation are:

- Exchange Deal Date/Time in YYYYMMDDHH24MISSssssss format (UTC-time)
- Exchange Deal Id left-padded with zeroes to 12 characters
- Exchange Market Id left-padded with zeroes to 10 characters

Example value: 201705151948088963240000012345670000463553

Breaking down the example value:

20170515 May 15, 2017

194808896324
7 PM hour, 48 minutes, 08 seconds, 896324 microseconds UTC

• 000001234567 Deal ID 1234567

0000463553
Market ID

#### 4.3 Executing Entity Id (RTS Field #4)

This will always be the LEI of the Exchange Member that is either the Buyer or Seller on the Transaction.

#### 4.4 Submitting Entity (RTS Field #6)

When the Executing Entity is a Non-MiFID Investment Firm, this field will be the LEI of the Operational MIC of the applicable Exchange:

Operational MIC	LEI
IFEU	549300UF4R84F48NCH34
NDEX	549300CZW488L20NT866

When the Executing Entity is a MiFID Investment Firm, this field will be populated with the same value as the Executing Entity (RTS Field #4) field.



## 4.5 Buyer Id (RTS Field #7)

When the Executing Entity (RTS Field #4) is the Seller, then this field shows the LEI for ICEU. Otherwise, refer to section 4.7 below.

## 4.6 Seller Id (RTS Field #16)

When the Executing Entity (RTS Field #4) is the Buyer, then this field shows the LEI for ICEU. Otherwise, refer to section 4.7 below.

## 4.7 IIA Short Code Derivable Fields (Several RTS Fields)

The following are all examples of blocks of data fields that may contain sensitive information, and as such may be shown as blank in the CSV to protect such information. In each of these cases, the applicable IIA Short Code is provided in the CSV:

- Buyer Fields (RTS 22 Fields #7, #9 #15)
- Seller Fields (RTS 22 Fields #16, #18 #24)
- Investment Decision Within Firm (RTS 22 Fields #57 #58)
- Execution Within Firm (RTS 22 Fields #59 #60)

## 4.8 Buyer Branch Country (RTS Field #8)

When the Executing Entity Id (RTS Field #4) is the Buyer, and it is different than the Buyer (RTS Field #7) field, then it is populated with the Country for the Executing Entity Id. Otherwise, the field is blank.

#### 4.9 Seller Branch Country (RTS Field #17)

When the Executing Entity Id (RTS Field #4) is the Seller, and it is different than the Seller (RTS Field #16) field, then it is populated with the Country for the Executing Entity Id. Otherwise, the field is blank.

## 4.10 Transmission of Order Indicator (RTS Field #25)

ICE will always report this value as "false".

## 4.11 Transmitting Firm Id for Buyer/Seller (RTS Fields #26 - #27)

These fields are only applicable to MiFID Investment Firms. ICE will always show these fields as blank.

#### 4.12 Quantity/Quantity currency (RTS Fields #30 - #31)

ICE will report all quantity in UNITS and therefore ICE will always show the quantity currency field as blank.

## 4.13 Derivative Notional Increase/Decrease (RTS Field #32)

This is not applicable for the Transactions provided by ICE. ICE will always show this field as blank.

#### 4.14 Price/Price Currency (RTS Field #33 - #34)

ICE will report all prices in Major currency. The Price field has to be adjusted to major currency when the currency code (RTS Field #34) is adjusted to major currency. ICE will always show the price currency field



as blank for the STIR products because the price on those records are reported as Basis Points instead of monetary.

## 4.15 Net Amount (RTS Field #35)

This field is not applicable for any ICE products. ICE will always show this field as blank.

## 4.16 Up-Front Payment/Currency (RTS Fields #38 - #39)

These fields are not applicable for any ICE products. ICE will always show these fields as blank.

## 4.17 Complex Trade Component Id (RTS Field #40)

ICE will populate this field on strategy trades (e.g. (e.g. spread, composite, etc.). The purpose of this field is to link the legs of the strategy together in order to have a unique identifier that can be used to link the transactions per side that belongs to the same strategy.

Consider the following example of a basic spread trade:

Order_ID	Side	Market	
User1	Buy	Aug/Sep	
User2	Sell	Aug	
User3	Buy	Sep	

In the above example, User1 is the only one truly engaged in a complex trade. ICE will report the following:

			Complex Trade
Order_ID	Side	Market	Component
User1	Buy	Aug	CompTrade123
User2	Sell	Aug	Null
User3	Buy	Sep	Null
User1	Sell	Sep	CompTrade123

## 4.18 Populating the Price (Field#33) field on Complex Trades

On all complex trade (ie. strategy, strip, composite, combo) ICE will report the same price on all legs of the complex trade<sup>8</sup> and when the original order price is not available, ICE will report the trade price on each leg.

<sup>&</sup>lt;sup>8</sup> Based on the ESMA guidelines at <a href="https://www.esma.europa.eu/sites/default/files/library/2016-1452">https://www.esma.europa.eu/sites/default/files/library/2016-1452</a> guidelines mifid ii transaction reporting.pdf in section 5.35.9 example 117.



## Consider the following Markets for examples:

Market Id	Example ISIN	Description		
222452	ISIN_1	Brent Crude Futures - North Sea - Oct17		
222451	ISIN_2	Brent Crude Futures - North Sea - Nov17		
219705	ISIN_3	Brent Crude Futures - North Sea - Dec17		
5066755	N/A	Brent Crude Spr - North Sea - Oct17/Nov17		
5066756	N/A	Brent Crude Spr - North Sea - Nov17/Dec17		

<sup>\*\*</sup> Note in the above, strategies don't have ISINs, as they are not considered financial instruments.

#### Trade Data

Entity	Market Id	Market Description	ISIN(s)	Buy/Sell	Price	Price According to ESMA Guidance (RTS 22 field 33)	Complex Trade Id (RTS 22 field 40)
LEI_1	222452	Oct17	ISIN_1	Buy	50.60	50.60	
LEI_3	222452	Oct17	ISIN_1	Sell	50.60	0.05	ABC
LEI_3	222451	Nov17	ISIN_2	Buy	50.55	0.05	ABC
LEI_4	222451	Nov17	ISIN_2	Sell	50.55	0.10	DEF
LEI_4	219705	Dec17	ISIN_3	Buy	50.45	0.10	DEF
LEI_2	219705	Dec17	ISIN_3	Sell	50.45	50.45	

## 4.19 Instrument Derivable Fields (RTS Fields #42 - #56)

ICE will provide an ISIN value for the Instrument Id field (RTS Field #41). This value can be used to derive the remaining instrument fields in RTS Fields #42 - #56. As such, these fields will be shown as blank in the file.

## 4.20 Short Selling Indicator (RTS Field #62)

This field is not applicable for any ICE products. ICE will always show this field as blank.

# 4.21 OTC Post Trade Indicator (RTS Field #63)

This field is not applicable for any ICE products. ICE will always show this field as blank.

## 4.22 Securities Financing Transaction (RTS Field #65)

ICE will always report this value as "false".