



## Trade Cancellation Policies

1.4

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System response times may vary for a number of reasons including market conditions, trading volumes and system performance.

## 1 Introduction

This document outlines the trade cancellation policies of Cboe Australia (Cboe) and is set out as follows:

- i. Section 2 – Principles underpinning the Cboe Trade Cancellation Policies;
- ii. Section 3 – Time Requirements
- iii. Section 4 – Unintended Wash Transactions;
- iv. Section 5 – Cancellation of MOC Crosses and Block Trade Reports
- v. Section 6 – Order Entry Controls;
- vi. Section 7 – Relevant Market Integrity Rules (Securities Markets) ('MIRs') and Operating Rules.

Participants are reminded that time can be of the essence when the cancellation of transactions is in issue and that any queries on the cancellation of transactions on the Cboe market should be addressed to [au.support@cboe.com](mailto:au.support@cboe.com).

## 2 Principles underpinning the Cboe Trade Cancellation Policies

Cboe is committed to working with participants on an ongoing basis to develop and deliver controls that effectively address unwarranted volatility and minimise the occurrence and impact of erroneous trading on the Cboe market<sup>1</sup>. Cboe seeks to achieve this underlying policy goal by preventing aberrant or erroneous orders from entering the market in the first place. In addition, Cboe has developed policies, outlined in this paper, to provide the market with certainty concerning the manner in which Cboe will deal with trade cancellations.

## 3 Timing

The cancellation of a transaction must take place on a timely basis in order to ensure the continued operation of a fair, orderly and transparent market. With the move to T + 2 settlement, this means that a participant will not be able, on T + 1, to ask Cboe to cancel a transaction: any such request must be made direct to CHES.

A clearly erroneous transaction will be cancelled under rule 5.6 prior to 6pm on the business day on which the relevant transaction is executed or reported (see paragraph 3.3 of Procedure 5.6). The time requirements in respect of error transactions cancelled under rule 5.6(a) are set out in section 2 of Procedure 5.6.

The relevant time limits in the market disputes process in rule 5.4 are outlined in paragraph 2.1 of Procedure 5.4. There is no time requirement specified for the cancellation of transactions under the fair, orderly and transparent power in rule 5.1 or the clearing power in rule 6.5. When considering whether to exercise its powers under these rules, Cboe will be conscious of the underlying policy goal of cancelling transactions on a timely basis so as not to prejudice the fair, orderly and transparent operation of the market.

## 4 Unintended Wash Transactions

An unintended wash transaction is a clearly erroneous transaction and therefore can be cancelled under Operating Rule 5.6(b). Clearly erroneous transactions that may fall under this rule must be brought to the attention of Cboe as soon as possible by completing a CSV file in the form of the worksheet at attachment one and sending it to [au.support@cboe.com](mailto:au.support@cboe.com). The CSV file contains just two columns, ExecBroker (FIX tag <76>) and TransactID (FIX tag <6807>), and must be received prior to 5pm for the transactions concerned to be considered by Cboe for cancellation.

An unintended wash transaction may also amount to an error transaction under Operating Rule 5.6(a). However, it should be noted that paragraph 2.1 of Procedure 5.6 requires participants to notify Cboe within 15 minutes of the transaction in order for it to be cancelled under rule 5.6(a). For this reason we will treat requests to cancel wash transactions as coming under Rule 5.6(b) and therefore participants are not required to notify Cboe of unintended wash transactions within 15 minutes.

The Cboe Trading Interface enables participants to tag specified orders with a NoSelfTrade key, which prevents execution against orders tagged with the same key in the Cboe order book. More detailed information on how to use this functionality can be found in the FIX 4.2 Trading Interface Specification. Participants are encouraged to use this facility (see Section 4 below on Order Entry Controls).

In the event that an unintended wash transaction has not been identified to Cboe prior to 5pm then a participant may bring the matter to the attention of Cboe and request that Cboe consider using its discretionary powers to cancel the transaction (these powers are outlined below). However, participants should not base their systems and controls in this area on the potential use of this discretionary power. It is important for participants to prioritise:

- i. Using the NoSelfTrade key to avoid unintended wash transactions being possible;

- ii. Completing a CSV file in the form of the worksheet at attachment one and submitting it prior to 5pm to enable Cboe to cancel the transaction prior to 6pm.

## 5 The Cancellation of Trade Reports and MOC Crosses

Participants can update their systems to enable the cancellation of MOC crossed trade and trade reports. The functionality for these cancellation controls is outlined in the FIX Trade Specification for the Cboe Trading System (CTS), which is available on the Cboe web site. In the case of cancellations of MOC crossed trades and by the participant submitting a trade report, cancellation requests can only be made by the same login used to connect to the Cboe trading system. A cancellation of a trade report can also be made from the FIX login that has been designated as the recipient of the unsolicited contra side of the trade report. All cancellations of MOC crossed trade reports must be completed on the same day as the transaction.

## 6 Order Entry Controls

Cboe operates and implements order entry controls for all products quoted on its market. The details of the anomalous order entry thresholds are accessible here: <http://au.chi-x.com/Trading/AnomalousOrderThresholds.aspx>

As stated above, Cboe also provides participants with the option of tagging orders on the Cboe market with a “NoSelfTrade” key. The details of this field (Tag 8174) are contained in the FIX 4.2 Trading Interface Specification.

As stated in rule 4.6 of the Operating Rules, Cboe also purges unexecuted orders at the end of each trading day. This means that any unexecuted orders remaining in the order book at the end of the post trading administration phase will be removed from the market and, if appropriate, should be re-entered on the next trading day by the participant. This ensures that there are no “stale” orders remaining in the Cboe order book that reflect outdated market conditions. This helps to minimise the possibility of erroneous trades.

## 7 Relevant MIRs and Operating Rules

### 7.1 Relevant MIRS and Operating Rules – Overview

Provisions relating to the cancellation of transactions are contained in the MIRs and the Operating Rules and Procedures of the Cboe Australia Market<sup>2</sup>. As outlined in the MIRs, Cboe will cancel transactions that take place within the “extreme trade range” and have been identified by or to Cboe<sup>3</sup>. These cancellations will take place, as appropriate, pursuant to Operating Rules 5.6(a) or (b). Cboe expects that due to its order entry controls there will only be very limited circumstances in which a transaction in the extreme trade range will take place on its market.

The Operating Rules of the Cboe market also allow for transactions to be cancelled in the following situations:

- i. To maintain an orderly market – rule 5.1(c);
- ii. Following a market dispute – rule 5.4(d) (i);
- iii. Where a participant submits a request to Cboe to cancel an error trade – rule 5.6(a);
- iv. Where a clearly erroneous trade has taken place – rule 5.6(b);
- v. When a relevant transaction is rejected by the designated or alternative central counterparty – rule 6.5.

It is not possible to exhaustively state the circumstances in which a transaction may be cancelled under each of these rules but some guidance is set out in the Operating Rules and Procedures.

### 7.2 Relevant MIRs and Operating Rules – Communications

The Procedures outline how Cboe will communicate with participants on trade cancellations. Cboe will usually verbally inform participants to the relevant transaction of any intended decision to cancel or amend a clearly erroneous transaction unless that is not required given the circumstances of the transaction (e.g. the participant has followed the established procedure for notifying Cboe of the need to cancel an unintended wash transaction).

Cboe will also inform the parties to a market dispute of any decision to cancel a transaction. As outlined in Rule 5.5 and the applicable Procedures, a participant has the right to apply for a review of a decision made by Cboe in respect of a market dispute. As outlined in paragraph 8.1 of Procedure 1.6, an application under rule 5.5 to review a decision by Cboe under rule 5.4 in respect of a market dispute, will not impact on the decision made by Cboe. Hence a transaction that is cancelled by Cboe pursuant to rule 5.4 will remain cancelled notwithstanding that it is the subject of a review. This will remain the case unless and until a decision is made by the Review Committee in respect of that cancellation.

With the move to T + 2 settlement, and the resulting impact on the ability of Cboe to cancel transactions on T + 1 (see paragraph 3.1.1 above), there has been a decrease in the possible circumstances in which Cboe will consider publishing the details of a cancelled transaction in a Market Operations Notice. This is because cancellations on 'T' are included in published real time market data. However, if a Notice is to be published, it will be the usual practice of Cboe not to publish a cancelled transaction until any possible review processes attached to the cancellation decision are finalised.

## Attachment One – Wash Trade Report Worksheet

Buyer ExecBroker (FIX tag 76)	TransactID (FIX tag 6807)

## Attachment Two – MIRs and Operating Rules

Rules/Procedures Rule References	A brief summary of some of the main requirements
MIRs Part 8.1 Order Entry Controls for Anomalous Order Thresholds	<p>Cboe is required to have anomalous order thresholds that take into account:</p> <ol style="list-style-type: none"> <li>The price at which a single order deviates substantially from: <ol style="list-style-type: none"> <li>Prevailing market conditions for the product;</li> <li>Historical trading patterns;</li> </ol> </li> <li>The tick size for the security.</li> </ol> <p>The thresholds must be publicly available.</p> <p>Cboe must have adequate controls to prevent anomalous orders from entering the market.</p>
MIRs Part 8.2 Extreme Trade Range (ETR)	<p>The ETR requirements imposed on Cboe differ according to whether an ETR event relates to ASX listed/quoted financial product or Cboe quoted financial product.</p> <p><b><u>ASX Listed/Quoted Financial Products</u></b></p> <p>Cboe must notify ASX of an ETR event identified by Cboe which relates to an ASX listed or quoted financial product and takes place on the Cboe order book. ASX must then notify Cboe that the relevant product has been put into a trading pause, following which Cboe must also immediately place that product into a trading pause on the Cboe market. The trading pause on the Cboe market will cease immediately after Cboe receives notice from the ASX that the trading pause has been lifted on the ASX market.</p> <p><b><u>Cboe Quoted Financial Products</u></b></p> <p>If an ETR event takes place in relation to Cboe quoted financial product, then Cboe is required to place the market for that financial product into a trading halt for 2 minutes.</p> <p><b><u>All Financial Products</u></b></p> <p>Cboe must also notify ASIC, and make public the product, price and time of <b>any</b> transaction executed on Cboe that is at a price in the Extreme Trade Range for that product.</p>

MIRs Part 8.3 Transparent cancellation policies	Cboe must have adequate policies/procedures for cancelling transactions entered on Cboe.
Operating Rules Rule 5.1	Cboe may take any action it considers necessary to ensure the market is fair, orderly and transparent, including cancelling or amending transactions.
Operating Rules Rule 5.4	Trade disputes – Cboe may take any action it considers appropriate, including the cancellation of a transaction, in relation to a dispute.
Procedure 5.4	Sections 1 and 2 of Procedure 5.4 outline the procedures that will be followed upon receipt of notification of a market dispute.
Operating Rules Rule 5.5	Appeal of trade disputes – a participant may apply to review a decision made by Cboe in respect of a market dispute.
Operating Rules Rule 5.6(a)	A participant can submit a request to cancel an error trade.
Procedure 5.6 Sections 2 and 4	If the participants to a transaction agree then an error transaction may be cancelled under rule 5.6(a). If the participants do not agree then Cboe may cancel or amend the transaction under its fair, orderly and transparent powers.
Operating Rules Rule 5.6(b)	Cboe may cancel or amend a clearly erroneous trade.
Procedure 5.6 Sections 3 and 4	Cboe may modify or cancel clearly erroneous transactions in a timely fashion and in all cases no later than 6pm on the business day on which the transaction was executed. Section 3 also sets out notification procedures and matters that may be taken into account when deciding whether to cancel or amend a transaction.
Operating Rules Rule 6.5	Cboe may cancel a transaction rejected by the designated or alternative central counterparty.

**Note:** MIRs may still reference Cboe until they are updated, however this does not affect the substance of the rules.

<sup>1</sup> The introduction of trade cancellations for MOC crosses and trade reports outlined in section 5 of this paper and introduced in CTS release v6.0, are examples of Cboe working with participants to deliver enhanced controls.

<sup>2</sup> A table listing the rules discussed in this paper is at **attachment two**.

<sup>3</sup> This range is defined by ASIC in rule 8.2.1 of the MIRs to mean all prices which are greater than or equal to a number of specified price steps or percentage points away from the reference price for that equity market product. The price steps/percentage points are specified in a table in rule 8.2.1 and 'reference price' is defined to mean a price determined in accordance with rule 8.2.2.