



CBOE EUROPE MIFID II GO LIVE GUIDANCE NOTE

VERSION 1.7

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Version History

Version Number	Publication Date	Description
1.0	27 th November 2017	Document Published.
1.1	29 th November 2017	Updated source of annual FX rate used LIS values to ESMA.
1.2	4 th December 2017	Clarified all ETRs must now be printed to market data.
1.3	8 th December 2017	Updated tick size approach for Swiss symbols.
1.4	13 th December 2017	Clarified date Cboe will start suspending symbols for trading as a result of the Double Volume Cap. Clarified effective date for MiFID II tick size tables.
1.5	21 st December 2017	Updated release time for deferred trades for ETNs and ETNs from 17:00 to 17:15.
1.6	5 th January 2018	Dark limit orders no longer need to be on-tick, which would have caused a reject.
1.7	15 th January 2018	Updated tick behavior for visible peg orders.

Contents

1.	Introduction	4
1.1	Intended Audience	4
2.	Summary of MiFID II Go-Live Exchange Release.....	5
2.1	Venue Order Record Keeping Obligations.....	5
2.2	Liquidity Provider Programme (LPP) Activities	6
2.3	Order to Trade Ratio Monitoring.....	6
2.4	Iceberg Order Type Behaviour	7
2.5	Double Volume Cap Monitoring.....	8
2.6	Tick Size.....	8
2.7	Deferrals and Waivers	9
2.8	Venue Best Execution Reports.....	10
2.9	Transaction Reporting for non-EEA Domiciled Firms.....	11
2.10	Firm Order Record Keeping Service.....	11
2.11	Routing to Nordic Venues.....	11
3.	RTS 24 Record Keeping Information	12
3.1	Required FIX/BOE Record Keeping Fields	12
3.2	Relevant Documentation	13
4.	Certification (UAT) & Production Availability	14
5.	Documentation	15
5.1	MiFID II Microsite	15
5.2	Guidance Notes.....	15
5.3	Technical Specifications	15
5.4	Participant Documentation	15

1. Introduction

This guidance note is intended to provide a description of the remaining behavioural changes to the Cboe BXE, CXE and TRF platforms for MiFIR and MiFID II (collectively "MiFID II") compliance, to be activated in Certification and Production as outlined in section 4.

These behavioural changes are in addition to [previous exchange releases](#) which included MiFID II-related content. Cboe's MiFID II implementation milestones can be found [here](#). Participants are advised to check this resource regularly for Cboe's upcoming MiFID II milestones.

1.1 Intended Audience

This guide is intended to be read by all Cboe Participants, ISVs and data vendors that interact with Cboe Equities services. In particular those with responsibility for implementing and supporting interfaces to Cboe (typically software engineers, support staff, business analysts and systems administrators).

2. Summary of MiFID II Go-Live Exchange Release

This section describes the remaining behavioural software changes being activated in certification and production for MiFID II as per the schedule outlined in section 4, which are **in addition** to the software changes already activated for MiFID II as part of [previous exchange releases](#).

Participants should be aware of these functional changes in the event that Participants wish to alter the way they interact with the system. In particular, any behavioural changes that may result in orders being rejected **are highlighted in yellow**.

No further real-time protocol changes (FIX, BOE, DROP, ODROP, Multicast PITCH, TCP PITCH or Last Sale Feed) or file format changes are specified as part of the go-live release. The previous exchange releases contained all the required protocol changes.

2.1 Venue Order Record Keeping Obligations

Mandatory supply of Order Record Keeping fields

Cboe is required to maintain records of all orders submitted into their systems. Cboe's approach involves requiring 'short code IDs' on orders and then Participants supplying the mapping from those short codes to their longer form National IDs, Algorithm IDs or LEIs through a mapping file out of band. In order to meet this requirement, all Participants submitting orders onto the Cboe BXE and CXE platforms are required to populate the relevant Order Record Keeping (ORK) fields per order, as well as register their short code/long code mappings.

The [Q2 2017 Exchange Release](#) specified the FIX and BOE protocol changes for supplying the required ORK fields. In addition, the web API for registering long codes was provided as part of this release. See Section 3 of this document for technical details on the FIX and BOE fields to be populated and how to register long codes. The [Record Keeping Approach](#) document contains further detailed guidance on this topic.

Participants submitting orders onto the Cboe Europe BXE and CXE platforms are required to populate the relevant ORK fields per order, as well as register their short code/long code mappings in Production by **Friday, 1st December, 2017**.

Whilst Cboe Europe will verify whether identifiers are supplied on orders, Cboe Europe will not reject orders in real-time in the event of missing short code or the use of unregistered short codes. The validation will be conducted out of band and Participants will have until end of day of the current trading session to register any missing long codes. Cboe will be monitoring Participant compliance with populating the relevant information as described in Rule 11.9 in the updated (under consultation) [Rule Book](#) and will issue warning letters for breaches. Cboe intend to impose financial penalties for Order Record Keeping requirements failure at some point during 2018, the level of fixed penalty fines will be notified in due course.

The Cboe Disciplinary Policy will be updated in the light of MiFID II, including Order Record Keeping obligation failures, and it is to be published at the end of November under the Regulatory section of the Cboe [Document Library](#).

2.2 Liquidity Provider Programme (LPP) Activities

Identification of LPP activities

Participants are required to indicate orders submitted to Cboe as part of a market making strategy or as part of any other liquidity provision activity carried out on the basis of terms pre-determined either by the issuer of the instrument which is the subject of the order or by the trading venue.

The [Q2 2017 Exchange Release](#) specified that Participants need to send OrderAttributeTypes(8015) = 2 (Liquidity Provision activity order) when orders are part of a liquidity provision activity on BXE and CXE. From **Tuesday, 2nd January 2018**, only orders flagged in this manner will be used when monitoring conformance to the requirements of any LPP operated by Cboe.

LPP 3

RTS 8 imposes an obligation on all firms pursuing an algorithmic market making strategy in a symbol on a trading venue to sign up to a monitored market making agreement in said symbol on that venue. Cboe currently operates two liquidity provision programmes, albeit they do not contain the MiFID II requirement of "comparable size".

Hence, Cboe introduced the third Liquidity Provider Program with the [Q4 2016 exchange release](#), although not yet incorporated in the Participant Manual and thus not monitored, nor enforced. The parameters of the Program have been consulted on throughout 2017. Subject to change, based on Participant feedback, the final set of parameters of the third Liquidity Provider Program will be published with the confirmation of the updates to the Participant Manual at the end of November 2017. The updated Participant Manual will be available under the Regulatory section of the Cboe [Document Library](#). The third Liquidity Provider Program parameters can be found [here](#).

From **Tuesday, 2nd January 2018**, LPP 3 obligations will start being measured, monitored and enforced. If a Participant is enrolled in the LPP 3 programme from this date onwards, any orders that are flagged as being part of liquidity provision activity will be contributing towards their LPP 3 obligations.

2.3 Order to Trade Ratio Monitoring

RTS 9 imposes an obligation on Cboe to establish a maximum unexecuted order-to-transaction ratio ("Order to Trade Ratio" or "OTR") as one of its controls to prevent disorderly trading conditions. Cboe has not previously had an Order to Trade Ratio policy in place.

The Order to Trade Ratio policy is incorporated in the [Rule Book & Participant Manual](#) currently under consultation. Please note that although the approach to implementing the OTR policy will not be amended, the thresholds are subject to change based on Participant feedback. The final values for the thresholds will be published with the confirmation of the updates to the Participant Manual at the end of November 2017 and will be available under the Regulatory section of the Cboe [Document Library](#). From **Tuesday, 2nd January 2018**, all trading in the Integrated and Reference Price Order Books will be subject to the OTR policy.

As part of the MiFID II obligations, Participants will be required to adhere to two OTR limits called 'max_otr_count' and 'max_otr_volume' in the Cboe [symbol reference files](#) measured per trading session and in each individual symbol. These values started being populated as part of the [2016 Q4 Exchange Release](#). Participants should be reading these values on a daily basis to ensure they are aware of the latest OTR limits. Participants registered and successfully meeting their obligations under a Liquidity Provider Program in a given symbol are subject to alternative Market Maker OTR limit for all trading activity in said symbol.

Monitoring of Participants' compliance with the OTR policy is performed by Cboe on a symbol level with a scope of daily trading sessions over periods defined by calendar months. Breaches of the OTR policy by a Participant will result in a notification from Cboe.

Cboe intends to impose financial penalties if a Participant breaches the ratio four times or more per symbol during a calendar month without any mitigating circumstances. These penalties will be introduced at some point during 2018. The level of fixed penalty fines will be notified in due course. The Cboe Disciplinary Policy will be updated in preparation of MiFID II, including OTR breaches and it is to be published at the end of November, under the Regulatory section of the Cboe [Document Library](#).

2.4 Iceberg Order Type Behaviour

Minimum Initial Order Size

Effective from **Tuesday, 2nd January 2018**, Cboe will introduce a minimum initial order size for icebergs of €10,000. **Any orders entered below this size will be rejected.** If an Iceberg Order is amended by the Participant, the 'new' Iceberg Order will be assessed against the same threshold and **the system will reject any orders that fail** a test of "a size that is greater than, or equal to € 10,000". System amends such as pegs are not affected by this validation.

Iceberg Behaviour

Currently Cboe Iceberg Order behaviour does not meet the requirement in RTS 1 which states that 'the [aggressive] order cannot interact with any other trading interest [passive] prior to its disclosure to the order book'. Effective from **Tuesday, 2nd January 2018**, the Iceberg behaviour will change as follows:

- All Iceberg order executions will be disseminated on market data as lit executions.
- LIS hidden orders will have priority over Iceberg reserves.
- In the event of multiple iceberg orders being present on the order book, incoming orders will cycle between the reserves as the tips continuously reload and alternate in priority as they are continuously re-inserted. This will ensure an Iceberg Order does not maintain priority against another on the same price-level. When executions print, the executions will print in accordance with the tip size (will be 'clipped' per reload) and any residual executed in the last 'clip', if any.
- Iceberg reserve executions will be billed at the iceberg reserve rate.
- Participants utilizing the "Restatement on Reload" Port Attribute (on FIX) and BOEv2 customers using the Order Restated v2 message shall receive a restatement for each iceberg refresh that may occur just prior to an iceberg hidden execution.

Peak to Total Volume Ratio

Lastly, effective from **Tuesday, 2nd January 2018**, Cboe will be introducing a ratio of 100 (or as notified from time to time) between the peak size and total volume of an iceberg order. **Any orders that do not adhere to this ratio will be rejected.** As an example an order of 20,000 with a peak of 200 would be accepted, but 20,001 with a peak of 200 or 20,000 with a peak of 199 would both be rejected.

2.5 Double Volume Cap Monitoring

RTS 3 imposes a cap on the usage of the Reference Price and Negotiated Transaction pre-trade transparency waivers. The caps reference total EU on venue volume and are calculated on a per symbol basis at 4% on any particular venue and 8% market-wide in any 12-month rolling period.

The [Q2 2017](#) and [Q4 2017 Exchange Releases](#) both introduced columns related to the capping of a symbol.

Effective **Friday, 1st December 2017**, there will be three columns available to Participants in the [symbol reference files](#) to determine if and why a symbol is capped, along with an estimate for when the symbol will uncap.

- capped: Indicates whether a double volume cap is in place. This may be regulatory driven or voluntarily entered into. Valid values are:
 - 0 = No cap in place.
 - 1 = Capped voluntarily by Cboe without instruction from the FCA.
 - 2 = Capped as per instructions from the FCA.
 - 3 = Not yet subject to double volume caps or double volume caps do not apply
- venue_cap_percentage: The approximate double volume cap usage on the Cboe venue expressed as a percentage of trading across all European venues as of the previous trading day. The calculation includes the Reference Price and Negotiated Transaction pre-trade transparency waivers for the previous eleven months and the current month to date combined. Note the usage is calculated at the venue level and therefore the value will be the same across BXE and CXE. Until 2nd January 2018, the value in this column should only be used as an indicator for testing.
- venue_uncap_date: The estimated date the cap indicated by the capped column will be removed. If no cap is in place this column will be blank.

MiFID II requires trading venues to take reasonable steps not to breach these limits. As a result, Cboe intends to apply a 'self-capping' approach for the venue specific threshold.

Based on our current understanding, effective **Friday, 12nd January 2018**, if a waiver cap is reached, a suspension in the relevant symbol will be triggered. Participants should be using the above columns from this date to determine whether a cap is in place. **Should a symbol not be available, any orders or trade reports entered using such waivers will be rejected.** The reject message will include a reason code indicating it was related to the Double Volume Caps.

Any orders submitted to the dark order book in the prohibited symbol will be rejected. Dark Lit Sweep orders will only target the integrated order book. Furthermore, Exchange Trade Reports (ETRs) in liquid symbols that **use the Negotiated Transaction Waiver will be rejected.** If Participants specify a routing instruction that **specifically targets dark liquidity, orders will be rejected.** If the routing instruction targets a mix of dark and lit liquidity, dark venues will be skipped.

2.6 Tick Size

Cboe currently provides [symbol reference files](#) that describe the symbols tradeable on Cboe, including ISIN, currency and the tick type. Cboe also provides [tick size reference files](#) which describe the allowed minimum price increments in different price bands for each symbol.

Tick sizes for equities will be harmonised across the EU as a result of MiFID II through the introduction of a tick size table that all instruments will adhere to. This table contains six liquidity bands which define the minimum tick size allowable for each instrument. The liquidity bands are based on the average daily number of transactions (ADNT) executed on the most relevant market (i.e. the market with the most liquidity).

Cboe will continue to follow the home markets on **Tuesday, 2nd January 2018** to determine the tick size tables to use, some home markets may choose to switch over to using the MiFID II tick tables in which case Cboe will align with this change. Please note that some markets may not switch over to using the MiFID II tick tables until the following day.

From **Wednesday, 3rd January 2018** tick size tables based on liquidity bands as defined by MiFID II will appear in the BXE and CXE tick size file. All symbols defined in the BXE and CXE [symbol reference files](#) will utilise the appropriate MiFID II [tick tables](#), other than for ETCs and ETNs, where the tick tables used by the home market will still be followed. The file formats as outlined in the hyperlinks will not be changing. The Trade Reporting (APA) and SI Quoting environments will continue to operate without specific tick size validation.

From **Friday, 19th January 2018**, Visible Peg Order Limit prices will be rounded away from the mid-point to a price increment on the less aggressive Cboe tick if the reference price is not on a Cboe tick. Both Primary and Market pegs can be visible on Cboe. On the same effective date, Visible Peg orders will be re-enabled for Swiss instruments. All of these changes take effect for all instruments on the Cboe BXE and CXE order books.

Tick Size for Swiss Instruments

For non-EU equities (Swiss instruments), the applicable liquidity band will be determined by the ADNT on the most liquid venue for that instrument within the EU. Any trading activity conducted outside the EU will not be considered for these purposes. Whilst Swiss venues will align their tick size regime with MiFID II by using the same tick size table, the ADNT used will be based on the most relevant market within Switzerland.

Effective **Tuesday, 2nd January 2018**, the tick sizes used for instruments that trade on EU and Swiss venues may differ, causing one or both sides of the quotes Cboe receives from the Swiss market to not be on the same tick increment as Cboe.

Participants should be aware of the following characteristics and order type restrictions for Swiss symbols:

- Execution prices may not be on a mid Cboe tick for Periodic auction, Cboe LIS, hidden and dark book trades.
- Mid-Point Alt Peg Orders (hidden) **will be rejected**.

2.7 Deferrals and Waivers

Large in Scale Values and Deferral Periods

Effective **Tuesday, 2nd January 2018** the minimum size of orders qualifying as large in scale compared with normal market size and the standard market sizes used by Cboe will be as per Tables 1, 2 and 3 of Commission Delegated Regulation (EU) 2017/587. Also when a delay is requested, and if a transaction meets the size requirement, Cboe will apply the delay as set out in Tables 4, 5 and 6 of Commission Delegated Regulation (EU) 2017/587 by using the symbol's ADV and the trade value, both in Euros, to calculate the maximum permitted delay.

Note the FX rates used for LIS value calculations are the annual rates obtained from [ESMA](#).

Late Trade Threshold

Currently post trade information shall be published as close to real-time as possible, with Participants having

up to three minutes to report the trades to Cboe before they are considered as “late”. Effective **Tuesday, 2nd January 2018** this late trade threshold will change to **one** minute.

Publication of ETR Trades

Currently ETRs sent to Cboe can be requested to not be published. As a result of MiFID II, this is no longer permitted, resulting in ETRs being categorised as Non-Price Forming Trades. Effective **Tuesday, 2nd January 2018**, ETRs must be flagged with:

- TradePublishIndicator(1390) = 1 to instruct the system to publish the trade immediately. Any requests to publish a trade using TradePublishIndicator(1390) = 0 **will not be honoured** and will instead be published immediately.
- TradePriceCondition(1839) = 15 to indicate on market data the ETR is non-price forming subject to conditions other than current market price (PRIC and NPFT). It is the Participants responsibility for ensuring the trade is correctly flagged.

Illiquid and LIS Waiver Usage

Effective **Tuesday, 2nd January 2018**, the waiver determination process used when two Large in Scale (LIS) orders hit each other in the dark pool will result in the LIS waiver being applied, rather than the Reference Price Waiver. Also, routed transactions to liquidity partners or trade reports conducted in illiquid symbols will have the Illiquid Negotiated Transaction pre-trade transparency waiver applied on executions in TrdRegPublicationReasons(8013)

Deferred Publication of Unknown Symbols in APA

Effective **Tuesday, 2nd January 2018**, Participants can choose to “self-defer” TCRs in an ISIN/Currency the system does not recognise (i.e. defined as an “unknown symbol”), by not reporting the trade to the APA until it is ready to be published. After the appropriate delay, the TCR can be submitted with TradePublishIndicator(1390) = 1 (Publish Immediately) with TrdRegPublicationReasons tag populated with the applicable deferral reason. (6=LRGS, Deferral for Large in Scale; 7 = ILQD, RTS2 Illiquid instrument; 8=SIZE, RTS2 Size specific or a combination of ILQD with LRGS or SIZE).

Any such TCR on an unknown symbol supplied with a deferral reason will never be flagged as late, regardless of the arrangement time. Unknown symbol TCRs submitted without a deferral reason will still be flagged late if they are not reported within 1 minute of the arrangement time.

Note that deferral requests in unknown symbols using TradePublishIndicator(1390) = 2 (Deferred Publication) will continue to be rejected. A port attribute can be configured upon request which will result in these deferrals no longer being rejected and will instead be published immediately. Please contact Trade Desk if you wish to use this port attribute.

Additions to the APA symbol universe can be requested via symboladditionseu@bats.com.

Support for ETCs and ETNs

Effective **Tuesday, 2nd January 2018**, the Reference Price Waiver and Negotiated Trade Waiver will no longer be supported for instruments listed with an asset class of ETC or ETN in the Cboe [symbol reference files](#). **Any ETRs or Dark Book order submitted to BXE or CXE for ETCs or ETNs will subsequently be rejected.**

The Cboe APA will support standard length deferrals for ETCs and ETNs. The trade release time will be set to T+2 (17:15) rather than T+2 (19:00).

2.8 Venue Best Execution Reports

Cboe will publish a first set of Best Execution Reports that are in a machine readable electronic format on a dedicated section of the public website by 30th June 2018. Further information regarding the publication of

these reports will be made available nearer the time.

2.9 Transaction Reporting for non-EEA Domiciled Firms

Cboe are providing a Transaction Reporting service for Participants that are not MiFID firms, including those that are domiciled outside the EEA as outlined in the [Regulatory Transaction Reporting Service Description](#).

Note that the use of this service is a **mandatory** requirement for all Participants that are not subject to MiFID transaction reporting requirements, which includes all non-EEA domiciled firms. **Participants who have not registered and successfully certified for the Regulatory Transaction Reporting Service (RTRG) during December 2017 will have their order entry ports disabled from Wednesday, 3rd January 2018.**

Effective **Wednesday, 3rd January 2018** non-EEA Domiciled Firms must start transaction reporting in Production.

2.10 Firm Order Record Keeping Service

Firm Order Record Keeping files provide order activity data on orders submitted on Cboe BXE and CXE environments and are provided to all firms to aid them in meeting record keeping obligations under MiFID II RTS 6. For further details on the Firm Order Record Keeping service offering please refer to the [specification](#).

2.11 Routing to Nordic Venues

Effective **Tuesday, 2nd January 2018** routing to Nordic Venues will be disabled.

3. RTS 24 Record Keeping Information

3.1 Required FIX/BOE Record Keeping Fields

Record Keeping Information	Content of the order details to be maintained by Cboe Europe at the disposal of the competent authority	FIX tags to supply	BOE fields to supply
Client identification code	<p>Code used to identify the client of the member or participant of the trading venue. In case of DEA, the code of the DEA user should be provided.</p> <p>Where the client is a legal entity, the LEI code of the client shall be used.</p> <p>Where the client is not a legal entity, the {NATIONAL_ID} shall be used. In the case of aggregated orders, the flag AGGR shall be used.</p> <p>In case of pending allocations, the flag PNAL shall be used. This field shall be left blank only if the member or participant of the trading venue has no client.</p>	<p>Where the order is for a single client who is a legal entity: PartyID (448) = Short Code ID / 0 (NONE) / 1 (AGGR) / 2 (PNAL) PartyRole(452) = 3 (Client ID) PartyIDSource(447) = P (Short code identifier) PartyRoleQualifier(2376) = 0 (where PartyID is 0, 1 or 2) or 23 (Firm or Legal Entity)</p> <p>Where the order is for a single client who is not a legal entity: PartyID (448) = Short Code ID / 0 (NONE) / 1 (AGGR) / 2 (PNAL) PartyRole(452) = 3 (Client ID) PartyIDSource(447) = P (Short code identifier) PartyRoleQualifier(2376) = 0 (where PartyID is 0, 1 or 2) or 24 (Natural Person)</p>	<p>Where the order is for a single client who is a legal entity: ClientID = Short Code ID / 0 (NONE) / 1 (AGGR) / 2 (PNAL) ClientQualifiedRole = 0 (where ClientID is 0, 1 or 2) or 23 (Firm or LEI)</p> <p>Where the order is for a single client who is not a legal entity: ClientID = Short Code ID / 0 (NONE) / 1 (AGGR) / 2 (PNAL) ClientQualifiedRole = 0 (where ClientID is 0, 1 or 2) or 24 (Natural Person)</p>
Investment decision within firm	<p>Code used to identify the person or the algorithm within the member or participant of the trading venue who is responsible for the investment decision.</p> <p>Where a natural person(s) within the member or participant of the trading venue is responsible for the investment decision the person who is responsible or has primary responsibility for the investment decision shall be identified with the {NATIONAL_ID}</p> <p>Where an algorithm is responsible for the investment decision the field shall be populated in accordance with Article 8 of Commission Delegated Regulation (EU) 2017/590 on transaction reporting (RTS 22).</p> <p>This field shall be left blank when the investment decision was not made by a person or algorithm within the member or participant of the trading venue.</p>	<p>Where decision maker is a trader: PartyID (448) = Short Code ID PartyRole(452) = 122 (Investment decision maker) PartyIDSource(447) = P (Short code identifier) PartyRoleQualifier(2376) = 24 (Natural Person)</p> <p>Where decision maker is an algorithm: PartyID (448) = Short Code ID PartyRole(452) = 122 (Investment decision maker) PartyIDSource(447) = P (Short code identifier) PartyRoleQualifier(2376) = 22 (Algorithm)</p>	<p>Where decision maker is a trader: InvestorID = Short Code ID InvestorQualifiedRole = 24 (Natural Person)</p> <p>Where decision maker is an algorithm: InvestorID = Short Code ID InvestorQualifiedRole = 22 (Algorithm)</p>

<p>Execution decision within firm</p>	<p>Code used to identify the person or algorithm within the member or participant of the trading venue who is responsible for the execution of the transaction resulting from the order.</p> <p>Where a natural person is responsible for the execution of the transaction, the person shall be identified by {NATIONAL_ID}</p> <p>Where an algorithm is responsible for the execution of the transaction, this field shall be populated in accordance with Article 9 of Commission Delegated Regulation (EU) 2017/590 on transaction reporting (RTS 22).</p> <p>Where more than one person or a combination of persons and algorithms are involved in the execution of the transaction, the member or participant or client of the trading venue shall determine the trader or algorithm primarily responsible as specified in Article 9(4) of Commission Delegated Regulation (EU) 2017/590 on transaction reporting (RTS 22) and populate this field with the identity of that trader or algorithm.</p>	<p>Where decision maker is a trader: PartyID (448) = Short Code ID / 3 (NORE) PartyRole(452) = 12 (Executing trader) PartyIDSource(447) = P (Short code identifier) PartyRoleQualifier(2376) = 0 (where PartyID is 3) or 24 (Natural Person)</p> <p>Where decision maker is an algorithm: PartyID (448) = Short Code ID/ 3 (NORE) PartyRole(452) = 12 (Executing trader) PartyIDSource(447) = P (Short code identifier) PartyRoleQualifier(2376) = 0 (where PartyID is 3) or 22 (Algorithm)</p>	<p>Where decision maker is a trader: ExecutorID = Short Code ID/ 3 (NORE) ExecutorQualifiedRole = 0 (where ExecutorID is 3) or 24 (Natural Person)</p> <p>Where decision maker is an algorithm: ExecutorID = Short Code ID/ 3 (NORE) ExecutorQualifiedRole = 0 (where ExecutorID is 3) or Algorithm (22)</p>
<p>Direct Electronic Access (DEA)</p>	<p>'true' where the order was submitted to the trading venue using DEA as defined in Article 4(1) (41) of Directive (EU) 2014/65.</p> <p>'false' where the order was not submitted to the trading venue using DEA as defined in Article 4(1) (41) of Directive (EU) 2014/65.</p>	<p>OrderOrigination (1724) = 0 (Default). Indicates DEA activity (as deemed by MiFID II) <u>is not</u> involved in the order.</p> <p>OrderOrigination (1724) = 5 (DEA). Indicates DEA activity (as deemed by MiFID II) is involved in the order.</p>	<p>OrderOrigination = 0 (Default). Indicates DEA activity (as deemed by MiFID II) <u>is not</u> involved in the order.</p> <p>OrderOrigination = 5 (DEA). Indicates DEA activity (as deemed by MiFID II) is involved in the order.</p>
<p>Liquidity provision activity</p>	<p>Indication as to whether an order is submitted to a trading venue as part of a market making strategy pursuant to Articles 17 and 48 of Directive 2014/65/EU or other activity in accordance with Article 3 of this Regulation.</p>	<p>OrderAttributeTypes (8015) =</p> <p>2 = Liquidity Provision activity order. This indicates the order is related to any sort of liquidity provision activity, as deemed by MiFID II. This flag is mandatory for orders which are part of a liquidity provision activity. Absence of this value indicates otherwise.</p>	<p>LiquidityProvision =</p> <p>N = Not Liquidity Provision (default) Y = Liquidity Provision</p>
<p>Algorithmic order</p>	<p>Indication the order submitted from the dealer/investment firm resulted from an algorithm.</p>	<p>OrderAttributeTypes (8015) =</p> <p>4 = Algorithmic order. This indicates that the order was placed as a result of an investment firm engaging in algorithmic trading. Absence of this value indicates otherwise.</p>	<p>AlgorithmicIndicator =</p> <p>N = No algorithm was involved (default) Y = Algorithm was involved</p>

3.2 Relevant Documentation

- [RTS 24: Record Keeping Guidance](#)
- [RTS 24: Record Keeping Approach](#)
- [MiFID II Identifier Management Application](#)
- [BXE/CXE FIX specification](#)
- [BXE/CXE BOE specification](#)

4. Certification (UAT) & Production Availability

All features described above will be effective in all Certification (UAT) and Production environments as per the following table:

Functionality	UAT Activation Date	Production Activation Date
<ul style="list-style-type: none"> Mandatory supply of Order Record Keeping fields. 	Already activated	1 st December 2017
<ul style="list-style-type: none"> New "venue_uncap_date" column in the symbol reference file and new value definitions for "capped" column. 	Already activated	1 st December 2017
<ul style="list-style-type: none"> LPP activities must be flagged using OrderAttributeTypes(8015) = 2 (Liquidity Provision activity order) LPP 3 obligations will start being measured, monitored and enforced. All trading in the Integrated and Reference Price Order Books will be subject to the OTR policy. Introduction of new Iceberg behavior, which includes a minimum Initial Order Size and Peak to Total Volume Ratio. Use of MiFID II Large in Scale Values and Deferral Periods. ** Late Trade Threshold changes from three to one minutes. Publication of Matched ETR Trades. Illiquid and LIS Waiver Usage. ** Support for Deferred Publication of Unknown Symbols in APA. Support for ETCs and ETNs. Routing to Nordic Venues Disabled. 	4 th December 2017	2 nd January 2018
<ul style="list-style-type: none"> Double volume cap suspension to commence. 	4 th December 2017	12 th January 2018
<ul style="list-style-type: none"> Tick size tables used by Cboe based on those used by the home markets; some markets may not switch over to using the MiFID II tick tables until 3rd January 2018. 	-	2 nd January 2018
<ul style="list-style-type: none"> Tick size tables based on liquidity bands as defined by MiFID II. ETNs and ETN symbols will still follow home market for tick size tables. Swiss symbol characteristics and order type restrictions as described in section 2.6 come into force. 	18 th December 2017	3 rd January 2018
<ul style="list-style-type: none"> Transaction Reporting for non-EEA Domiciled Firms 	Already activated	3 rd January 2018

** Note that in Certification, for the purpose of calculating the LIS values and deferral periods in accordance with Annex II of RTS 1 and Annex III of RTS2 (for ETCs and ETNs) we will be using MiFID I applicable ADT values with the MiFID II thresholds. Similarly, we will be using MiFID I designations of a symbol as liquid or illiquid in order to determine usage of the illiquid waiver. From 18th December 2017, MiFID II ADT values and MiFID II liquid/illiquid designations will be used in Certification.

5. Documentation

5.1 MiFID II Microsite

- Cboe Europe MiFID II Microsite: <https://markets.cboe.com/europe/equities/regulation/mifid/>
- Cboe Europe MiFID II Implementation Milestones: <https://markets.cboe.com/europe/equities/regulation/mifid/milestones/>

5.2 Guidance Notes

- Current Guidance Note:
 - MiFID II Behavioural Changes Guidance Note: http://cdn.batstrading.com/resources/participant_resources/BCE-GuidanceNote-MiFID_II_BehaviouralChanges.pdf
- Previous MiFID II Exchange Release Guidance Notes:
 - Q4 2017: http://cdn.batstrading.com/resources/participant_resources/BCE-GuidanceNote-Q42017Release_Final.pdf
 - Q2 2017: http://cdn.batstrading.com/resources/participant_resources/BCE-GuidanceNote-Q22017Release_Final.pdf
 - Q4 2016: http://cdn.batstrading.com/resources/participant_resources/BCE-GuidanceNote-Q42016Release_Final.pdf
 - Q2 2016: http://cdn.batstrading.com/resources/participant_resources/BCE-GuidanceNote-Q22016Release_Final.pdf

5.3 Technical Specifications

- BXE/CXE FIX: http://cdn.batstrading.com/resources/participant_resources/CBOE_Europe_FIX_Specification.pdf
- BXE/CXE BOEv2: http://cdn.batstrading.com/resources/participant_resources/CBOE_Europe_BOE2_Specification.pdf
- TRF FIX: http://cdn.batstrading.com/resources/participant_resources/CBOE_ChiX_Europe_TRF_FIX_Specification.pdf
- TRF BOE v2: http://cdn.batstrading.com/resources/participant_resources/CBOE_Europe_TRF_BOE2_Specification.pdf
- TCP PITCH: http://cdn.batstrading.com/resources/participant_resources/CBOE_Europe_PITCH_Specification.pdf
- MC PITCH: http://cdn.batstrading.com/resources/participant_resources/CBOE_Europe_MC_PITCH_Specification.pdf
- Last Sale: http://cdn.batstrading.com/resources/participant_resources/CBOE_Europe_Last_Sale_Specification.pdf
- Symbol File: http://cdn.batstrading.com/resources/participant_resources/CBOE_Europe_Reference_Data.pdf
- Trade Data File: http://cdn.batstrading.com/resources/participant_resources/CBOE_Europe_Trade_Data_File.pdf
- Trade Detail File: http://cdn.batstrading.com/resources/participant_resources/CBOE_Europe_Trade_Detail_File.pdf
- Firm Order Record Keeping: http://cdn.batstrading.com/resources/participant_resources/Cboe_Europe_MiFID2_RTS6_Firm_Order_Record_Keeping_File_Specification.pdf
- Regulatory Transaction Reporting Service Description: http://cdn.batstrading.com/resources/participant_resources/Bats_Europe_Regulatory_Transaction_Reporting_Gateway.pdf
- Technical Change Calendar: http://cdn.Batstrading.com/resources/participant_resources/CBOE_Change_Calendar.pdf

5.4 Participant Documentation

- Participant Manual: http://cdn.batstrading.com/resources/participant_resources/BATS_Chi-X_Europe_Participant_Manual.pdf
- Rule Book: http://cdn.batstrading.com/resources/participant_resources/BATS_Chi-X_Europe_Rule_Book.pdf

Please contact the Trade Desk or your Account Manager if you have any questions.