

FIA Survey of Exchange-Provided Electronic Trading Risk Mitigation Controls



Contact Information

1. Exchange Name *

As you would like it to appear on the FIA website

2. Name of person completing the survey *

For internal FIA use only



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For internal FIA use only

4. Name/Department for FIA members to find additional information

This will be published on the FIA website

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This will be published on the FIA website

6. Website URL for FIA members to find additional information

This will be published on the FIA website

Introductory Question



7. Does the Exchange allow direct market access?

Check all that apply

☐

Direct access for Clearing Members

☐

Direct access for Traders sponsored by Clearing Members/Sponsoring Firms

☐

Direct access for any Trader who wants it

☒

Direct access via a Clearing Member's/Sponsoring Firm's infrastructure.

Exchange-Provided Risk Management Tools



The following questions pertain to Exchange-Provided Risk Management Tools Configurable by Clearing Members/Sponsoring Firms and Traders

8. Does the Exchange make **maximum order size limits** available to Clearing Members/Sponsoring Firms and Traders, and if so, how can they be set?

Check all that apply

- ☐ Not applicable
- ☒ Available to set manually
- ☐ Available to set via API
- ☐ Is this a mandatory control?

9. If mandatory, provide rule citation

10. Does the Exchange make **maximum intraday net position limits** available to Clearing Members/Sponsoring Firms and Traders, and if so, how can they be set?

Check all that apply

- ☐ Not applicable
- ☒ Available to set manually
- ☒ Available to set via API
- ☐ Is this a mandatory control?

11. If mandatory, provide rule citation

12. Does the Exchange make **maximum intraday gross position limits** available to Clearing Members/Sponsoring Firms and Traders, and if so, how can they be set?

Check all that apply

- ☒ Not applicable
- ☐ Available to set manually
- ☐ Available to set via API
- ☐ Is this a mandatory control?

13. If mandatory, provide rule citation

14. Does the Exchange make **maximum intraday notional value limits** available to Clearing Members/Sponsoring Firms and Traders, and if so, how can they be set?

Check all that apply

- ☒ Not applicable
- ☐ Available to set manually
- ☐ Available to set via API
- ☐ Is this a mandatory control?

15. If mandatory, provide rule citation

16. Does the Exchange make **maximum intraday margin utilization/buying power limits** available to Clearing Members/Sponsoring Firms and Traders, and if so, how can they be set?

Check all that apply

- ☐ Not applicable
- ☒ Available to set manually
- ☐ Available to set via API
- ☐ Is this a mandatory control?

17. If mandatory, provide rule citation

18. Does the Exchange make **maximum intraday loss** available to Clearing Members/Sponsoring Firms and Traders, and if so, how can it be set?

Check all that apply

- ☒ Not applicable
- ☐ Available to set manually
- ☐ Available to set via API
- ☐ Is this a mandatory control?

19. If mandatory, provide rule citation

20. Does the Exchange make **maximum number of open orders** available to Clearing Members/Sponsoring Firms and Traders, and if so, how can it be set?

Check all that apply

- ☒ Not applicable
- ☐ Available to set manually
- ☐ Available to set via API
- ☐ Is this a mandatory control?

21. If mandatory, provide rule citation

22. Does the Exchange make **restricted list management** available to Clearing Members/Sponsoring Firms and Traders, and if so, how can it be set?

Check all that apply

- ☐ Not applicable
- ☒ Available to set manually
- ☒ Available to set via API
- ☐ Is this a mandatory control?

23. If mandatory, provide rule citation

24. Does the Exchange make **order/quote volume limits** available to Clearing Members/Sponsoring Firms and Traders, and if so, how can they be set?

Check all that apply

- ☐ Not applicable
- ☒ Available to set manually
- ☐ Available to set via API
- ☐ Is this a mandatory control?

25. If mandatory, provide rule citation

26. Does the Exchange make **user defined price collars** available to Clearing Members/Sponsoring Firms and Traders, and if so, how can they be set?

Check all that apply

- ☒ Not applicable
- ☐ Available to set manually
- ☐ Available to set via API
- ☐ Is this a mandatory control?

27. If mandatory, provide rule citation

28. Does the Exchange make **number of outstanding orders/quotes** available to Clearing Members/Sponsoring Firms and Traders, and if so, how can they be set?

Check all that apply

- ☒ Not applicable
- ☐ Available to set manually
- ☐ Available to set via API
- ☐ Is this a mandatory control?

29. If mandatory, provide rule citation

30. Does the Exchange make **outstanding order/quote volume limits** available to Clearing Members/Sponsoring Firms and Traders, and if so, how can they be set?

Check all that apply

- ☐ Not applicable
- ☒ Available to set manually
- ☒ Available to set via API
- ☐ Is this a mandatory control?

31. If mandatory, provide rule citation

32. Does the Exchange make **number of messages per time interval** available to Clearing Members/Sponsoring Firms and Traders, and if so, how can it be set?

Check all that apply

- ☒ Not applicable
- ☐ Available to set manually
- ☐ Available to set via API
- ☐ Is this a mandatory control?

33. If mandatory, provide rule citation

34. Does the Exchange make **message volume per time interval** available to Clearing Members/Sponsoring Firms and Traders, and if so, how can it be set?

Check all that apply

- ☒ Not applicable
- ☐ Available to set manually
- ☐ Available to set via API
- ☐ Is this a mandatory control?

35. If mandatory, provide rule citation

36. Are there any other pre-trade risk control tools that the Exchange makes available to Clearing Members/Sponsoring Firms and Traders, and if so, how can they be set?



-Self-Match Prevention allows a business unit to prevent that certain own orders of the same instrument match against each other. The functionality helps Exchange/Trading Participants avoiding wash trades.

-Market Maker Protection is a set of additional validations against quotes, preventing quotes to turn stale.

-Maximum Order Value validates incoming orders, quotes, or TES trades against a pre-defined notional value. It prevents orders, quotes or TES trades with too large of a notional value to disrupt markets.

- Emergency Mass Deletion allows Exchange/Trading Participants to select orders en masse and delete them. This functionality allows Trading Participants to exit the market in an emergency.

- A Kill-Switch that for an entire Exchange/Trading Participant or a single user deletes immediately all open orders and quotes as well as prevents to enter new orders and quotes. It provides Exchange/Trading Participants to exit the market in an emergency.

37. Does the Exchange allow Clearing Members/Sponsoring Firms and Traders to set separate hard and soft limits?

☒ Yes

☐ No

38. If yes, is the setting of separate hard and soft limits mandatory?

☐ Yes

☒ No

39. If mandatory, provide rule citation.

40. Does the Exchange make **maximum order size limits** available to Clearing Members/Sponsoring Firms and Traders, and if so, at what product level can they be set?

Check all that apply

- ☐ Not applicable
- ☐ Available to set by asset class
- ☒ Available to set by product group
- ☒ Available to set by product
- ☒ Available to set by spread
- ☐ Available to set by expiry
- ☐

Other

41. Does the Exchange make **maximum intraday net position limits** available to Clearing Members/Sponsoring Firms and Traders, and if so, at what product level can they be set?

Check all that apply

- ☐ Not applicable
- ☐ Available to set by asset class
- ☐ Available to set by product group
- ☒ Available to set by product
- ☒ Available to set by spread
- ☐ Available to set by expiry
- ☐

Other

42. Does the Exchange make **maximum intraday gross position limits** available to Clearing Members/Sponsoring Firms and Traders, and if so, at what product level can they be set?

Check all that apply

☒

Not applicable

☐

Available to set by asset class

☐

Available to set by product group

☐

Available to set by product

☐

Available to set by spread

☐

Available to set by expiry

☐

Other

43. Does the Exchange make **maximum intraday notional value limits** available to Clearing Members/Sponsoring Firms and Traders, and if so, at what product level can they be set?

Check all that apply

☒

Not applicable

☐

Available to set by asset class

☐

Available to set by product group

☐

Available to set by product

☐

Available to set by spread

☐

Available to set by expiry

☐

Other

44. Does the Exchange make **maximum intraday margin utilization/buying power limits** available to Clearing Members/Sponsoring Firms and Traders, and if so, at what product level can they be set?

Check all that apply

- ☐ Not applicable
- ☐ Available to set by asset class
- ☐ Available to set by product group
- ☐ Available to set by product
- ☐ Available to set by spread
- ☐ Available to set by expiry
- ☒ Global, across all asset classes

Other

45. Does the Exchange make **maximum intraday loss** available to Clearing Members/Sponsoring Firms and Traders, and if so, at what product level can it be set?

Check all that apply

- ☒ Not applicable
- ☐ Available to set by asset class
- ☐ Available to set by product group
- ☐ Available to set by product
- ☐ Available to set by spread
- ☐ Available to set by expiry

☐

Other

46. Does the Exchange make **maximum number of open orders** available to Clearing Members/Sponsoring Firms and Traders, and if so, at what product level can it be set?

Check all that apply

☒

Not applicable

☐

Available to by asset class

☐

Available to set by product class

☐

Available to set by product

☐

Available to set by spread

☐

Available to set by expiry

☐

Other

47. Does the Exchange make **restricted list management** available to Clearing Members/Sponsoring Firms and Traders, and if so, at what product level can it be set?

Check all that apply

☐

Not applicable

☒

Available to set by asset class

☒

Available to set by product group

☒

Available to set by product

☒

Available to set by spread

☐

Available to set by expiry

☐

Other

48. Does the Exchange make **order/quote volume limits** available to Clearing Members/Sponsoring Firms and Traders, and if so, at what product level can they be set?

Check all that apply

☐

Not applicable

☐

Available to set by asset class

☒

Available to set by product group

☒

Available to set by product

☒

Available to set by spread

☐

Available to set by expiry

☐

Other

49. Does the Exchange make **user defined price collars** available to Clearing Members/Sponsoring Firms and Traders, and if so, at what product level can they be set?

Check all that apply

☒

Not applicable

☐

Available to set by asset class

☐

Available to set by product group

☐

Available to set by product

☐

Available to set by spread

☐

Available to set by expiry

☐

Other

50. Does the Exchange make **number of outstanding orders/quotes** available to Clearing Members/Sponsoring Firms and Traders, and if so, at what product level can they be set?

Check all that apply

☒

Not applicable

☐

Available to set by asset class

☐

Available to set by product group

☐

Available to set by product

☐

Available to set by spread

☐

Available to set by expiry

☐

Other

51. Does the Exchange make **outstanding order/quote volume limits** available to Clearing Members/Sponsoring Firms and Traders, and if so, at what product level can they be set?

Check all that apply

☐

Not applicable

☐

Available to set by asset class

☐

Available to set by product group

☒

Available to set by product

☒

Available to set by spread

☐

Available to set by expiry

☐

Other

52. Does the Exchange make **message volume per time interval** available to Clearing Members/Sponsoring Firms and Traders, and if so, at what product level can it be set?

Check all that apply

☒

Not applicable

☐

Available to set by asset class

☐

Available to set by product group

☐

Available to set by product

☐

Available to set by spread

☐

Available to set by expiry

☐

Other

53. Does the Exchange make **number of messages per time interval** available to Clearing Members/Sponsoring Firms and Traders, and if so, at what product level can it be set?

Check all that apply

☒

Not applicable

☐

Available to set by asset class

☐

Available to set by product group

☐

Available to set by product

☐

Available to set by spread

☐

Available to set by expiry

☐

Other

54. Are there any other pre-trade risk control tools that the Exchange makes available to Clearing Members/Sponsoring Firms and Traders, and if so, at what product level can they be set?

Self-Match Prevention applies across all products

Market Maker Protection can be configured per product

Maximum Order Value applies across all products

Emergency Mass Deletion allows Trading Participants to configure for a single product

Kill-Switch applies across all products

55. At what user level does the Exchange allow pre-trade risk control tools to be set?

Check all that apply



Clearing Firm/Sponsoring Firm Default



Trader Firm



Trader Account Number



Trader/User Login



Trader Defined Desk/Strategy Group



Other

56. Does the Exchange have 'clone user' functionality which allows for the copying/mirroring of controls from one Trader, group, firm etc. to another?



Yes



No

57. If yes, does the functionality allow for choosing what components to clone rather than cloning everything?

☒ Yes

☐ No

58. Does the Exchange allow Clearing Member/Sponsoring Firm administrators to raise or lower limits during the trading day?

☒ Yes

☐ No

59. Does the Exchange allow Trader administrators to raise or lower limits during the trading day?

☒ Yes

☐ No

60. Does the Exchange offer post-trade surveillance tools?

☐ Yes

☒ No

61. If yes, which of the following are available?

Check all that apply

☐ Repeated execution alerts/controls

☐ Volume per time interval controls

☐

Other

62. Does the Exchange offer configurable price tolerance levels?

☐ Yes

☒ No

63. If yes, how is the logic designed?

Check all that apply

☐ Price deviation

☐ Market depth protection

☐ Price drift control

☐ Market order disabled

☐

Other

64. Does the Exchange provide self-match prevention tools configurable by both the Clearing Member/Sponsoring Firm and the Trader?

☒ Yes

☐ No

65. If yes, which of the following features are available?

Check all that apply

- ☐ New order cancels entire resting order
- ☒ New order cancels only same quantity of resting order
- ☐ New order is canceled, resting order remains
- ☐ Both new order and resting order are canceled
- ☐ Orders will execute against each other but not print
- ☒ Configurable only by Trader
- ☐ Configurable only by Clearing Member/Sponsoring Firm
- ☐

Other

66. If yes, at what levels can the controls be set

Check all that apply

- ☐ Member Firm Level
- ☐ Group Level
- ☐ Trader ID Level
- ☐ Member ID Level
- ☐ Customer Account Level
- ☐ Strategy Level
- ☐ Session ID Level

67. What other services does the Exchange offer Clearing Members/Sponsoring Firms to assist with risk management?



Check all that apply



Drop copy feeds



Kill Switches



Independent order management tool



Cancel on disconnect



Order cancel (on behalf)



Mass cancel (on behalf)



Non-exchange infrastructure order/trade feed (web etc.)



Ability to cancel delayed orders (as used in matching engine-based speed bumps)



Other

68. What other services does the Exchange offer Traders to assist with risk management?

Check all that apply



Drop copy feeds



Kill Switches



Independent order management tool



Cancel on disconnect



Order cancel (on behalf)



Mass cancel (on behalf)



Non-exchange infrastructure order/trade feed (web etc.)



Ability to cancel delayed orders (as used in matching engine-based speed bumps)



Other

69. If the Exchange makes a "drop copy" feed available, what information is contained in the feed?

Check all that apply

- ☐ Order Acknowledgments
- ☒ Filled Orders
- ☒ New Orders
- ☒ Order Amendments
- ☒ Order Cancellations
- ☐ Reject Messages
- ☒ Time stamps for all events
- ☒ Order Numbers for all events
- ☐

Other

70. If the Exchange offers a Kill Switch to Clearing Members/Sponsoring Firms, how is it implemented?

Check all that apply

- ☒ Manually triggered and reset using an exchange-provided administration tool
- ☐ Triggered and reset using an exchange provided API
- ☐ Automated kill switch triggered by Exchange defined parameters.
- ☐ Automated kill switch triggered by Exchange defined parameters.
- ☒ Automated kill switch triggered by Clearing Member defined parameters

Other

71. If triggered and not reset intraday, does the exchange automatically reset the Kill Switch?

no

72. If triggered and not reset intraday, does the exchange require the Kill Switch to be manually reset?

yes

73. If the Exchange offers a Kill Switch to Traders, how is it implemented?

Check all that apply



Manually triggered and reset using an exchange-provided administration tool



Triggered and reset using an exchange provided API



Automated kill switch triggered by Exchange defined parameters.



Automated kill switch triggered by Trader defined parameters

Other

74. If triggered and not reset intraday, does the exchange automatically reset the Kill Switch?

no

75. If triggered and not reset intraday, does the exchange require the Kill Switch to be manually reset?

yes

76. If the Exchange provides independent order management capability, how is it provided?

Check all that apply

☒ Manually using an exchange-provided administration tool?

☒ Automated by API

☐

Other

77. If the Exchange provides independent order management capability, does it enable the following **by phone**?

Check all that apply

☒ Ability to review all orders

☒ Ability to review fill information for the day, including partial fills

☒ Ability to review cancel and replace history

☒ Ability to review timestamps

☒ Ability to cancel individual orders

☒ Ability to cancel groups of orders

☒ Ability to cancel all working orders with a single command

☐

Other

78. If the Exchange provides independent order management capability, does it enable the following **by portal**?

Check all that apply

- ☒ Ability to review all orders
- ☒ Ability to review fill information for the day, including partial fills
- ☒ Ability to review cancel and replace history
- ☒ Ability to review timestamps
- ☒ Ability to cancel individual orders
- ☒ Ability to cancel groups of orders
- ☒ Ability to cancel all working orders with a single command

☐

Other

79. **If the Exchange offers cancel on disconnect at the session level, please specify whether it is:**

☐

Mandatory

☒

Discretionary

80. If Mandatory, provide rule citation

General Exchange Pre-Trade Risk Controls

The following questions pertain to Exchange Pre-Trade Risk Controls Generally.



81. If the Exchange provides pre-trade control tools, where do each of the tools reside?



	Gateway	Matching Engine	Other
Maximum order size limits	☒	☐	☐
Maximum intraday net position limits	☐	☒	☐
Maximum intraday gross position limits	☐	☐	☐
Maximum intraday notional value limits	☐	☐	☐
Maximum intraday margin utilization/buying power limits	☐	☐	☒
Maximum intraday loss	☐	☐	☐
Maximum number of open orders	☐	☐	☐
Restricted list management	☒	☐	☐
Order/Quote volume limits	☒	☐	☐
User defined price collars	☐	☐	☐
Number of outstanding orders/quotes	☐	☐	☐
Outstanding order/quote volume limits	☐	☐	☐
Number of messages per time interval	☐	☐	☐
Message volume per time interval	☐	☐	☐

82. If the Exchange provides any other pre-trade control tools, what are these, and where do each of the tools reside?



Self-Match Prevention - matching engine

Market Maker Protection - matching engine

Maximum Order Value - matching engine

Emergency Mass Deletion - matching engine

Kill-Switch - matching engine

83. If the Exchange provides pre-trade control tools, what happens when each limit is hit?



	Reject Order	Pause Order	Shut Down Session
Maximum order size limits	☒	☐	☐
Maximum intraday net position limits	☒	☐	☐
Maximum intraday gross position limits	☐	☐	☐
Maximum intraday notional value limits	☐	☐	☐
Maximum intraday margin utilization/buying power limits	☒	☐	☐
Maximum intraday loss	☐	☐	☐
Maximum number of open orders	☐	☐	☐
Restricted list management	☒	☐	☐
Order/quote volume limits	☐	☐	☐
User defined price collars	☐	☐	☐
Number of outstanding orders/quotes	☐	☐	☐
Outstanding order/quote volume limits	☐	☐	☐
Number of messages per time interval	☐	☐	☐
Message volume per time interval	☐	☐	☐

84. Are there any other details that you would like to provide on the above question?



Maximum intraday margin utilization/buying power limits (aka Eurex Advanced Risk Protection) supports soft and hard breaches, with various responses, rejecting orders being one of them.

85. If the Exchange provides margin utilization/buying power control limits, how is the margin calculated?

Four pre-defined types of limits are available, each representing different aggregates of risk values, calculated on Eurex Clearing's real-time risk calculation engine. All limit types are to be set on member level, i.e. per Member ID used:

a) Exposure: Total Margin Requirement

b) Profit & Loss: Premium Margin + Current Liquidating Margin + Variation Margin + Option Premium

c) Cash: Variation Margin + Option Premium

d) Risk: Additional Margin + Initial Margin

86. Does the Exchange have a risk controls portal available for Clearing Member/Sponsoring Firm and Trader viewing?

☒ Yes

☐ No

87. Does the Exchange set default risk controls if nothing is set by the Clearing Member/Sponsoring Firm or Trader?

☒ Yes

☐ No

88. If the Exchange provides pre-trade control tools, what is the sequence of events when a pre-trade control check is performed?

☐ The order is already in the matching engine queue and then the control check is performed ("out-of-line check")

☐ The control check is performed before the order reaches the matching engine and gets queued ("in-line check")

89. If the Exchange provides pre-trade control tools, are the pre-trade controls in the critical path even if they are optional (i.e., is the code still called)?

☒ Yes

☐ No

90. If the Exchange provides pre-trade control tools, do any of the controls add latency?

☐ Yes

☒ No

91. If yes, what is the latency added?



92. If the Exchange provides pre-trade control tools, how are users notified if the controls are not operating as intended?

Available Pre-trade control tools are part of the trading (T7) or the clearing (C7) system. Updates on availability of pre-trade control tools is part of the general updates on T7 / C7 service availability. In case of service degradation, members are informed via newsboard.

93. If the Exchange provides pre-trade control tools, how quickly do changes to the controls go into effect?

Changes take effect intraday, meaning immediately.

94. If the Exchange provides pre-trade control tools, is there a notification that the controls have been changed?

☐ Yes

☒ No

95. If yes, please provide specifics

96. If the Exchange provides pre-trade control tools, are previous control settings stored?

☒ Yes

☐ No

97. If yes, provide specifics on what information is stored and for how long

Settings of transaction size limits, pre-trade risk limits, and other risk related functionalities are audit trailed. Audit trails are made available to customers at the end of the day. Reports are stored for 10 business days.

98. If the Exchange provides pre-trade control tools is an audit trail of controls entered and controls changed available?

☒ Yes

☐ No

Exchange Market Integrity Controls



The following questions pertain to Exchange Market Integrity Controls

99. **What controls does the Exchange set to prevent market disruption? Please indicate whether the controls are "available" or "mandatory."**

	Available	Mandatory
Dynamic price banding	☐	☒
Market pauses or halts	☐	☒
Message policies	☐	☒
Message throttles	☐	☒
Kill switches	☒	☐
Cancel on disconnect	☒	☐
Error policies	☒	☐

100. If any of the above are mandatory, please provide the rule citation in each case below.

All the above mentioned mechanisms are mandatory per regulatory requirements. Price banding, volatility interruptions, message policies and throttles are set by exchange, kill switches, cancel on disconnect and error policies are available at the exchange.

Price banding is required per Art. 48(4) and (6) MiFID II, Art.20 CDR 2017/584.

Market pauses or volatility interruptions are required per Art. 48(5) MiFID II, Art.19 CDR2017/584.

Message policies (OTR, Excessive System Usage Fee) under Art. 48(9) MiFID II and CDR2017/566.

Message throttles are defined by Art. 48(4)-(6) MiFID II, Art.18 (3)(g) CDR 2017/584.Kill switches - Art. 48 (4)-(6) MiFID II, Art 18 (2) (c) CDR 2017/584.

Cancel on disconnect - Art. 48 (4)-(6) MiFID II, Art 18 (2) (b)+(d) CDR 2017/584.

Error policies – Art. 48(4)-(6) MiFID II, Art 18 (3) (f) CDR 2017/584.

101. If the Exchange has dynamic price banding, does it enable the following?

Check all that apply

☒ Limits differentiated based on the specific characteristics of a product

☒ Limits differentiated based on the specific conditions of the market

☒ Limits that can be adapted intraday

☐

Other

102. If the Exchange has market pauses or halts, what specific events trigger such halts?

Check all that apply

☐ Orders outside a given price deviation for a given financial instrument

☒ Change in volatility over a specified time interval for a given financial instrument

☐

Other

103. If the Exchange applies a market pause or halt for a specific financial instrument, does it coordinate halts with:

Check all that apply

☐ Related financial instruments on the same exchange

☐ Related financial instruments on other exchanges

104. If the Exchange has market pauses or halts, how is price discovery re-established after the event?

☐ Resume continuous trading

☐ An intraday auction period

☐

Other

105. If the Exchange has market pauses or halts, how is the event communicated to market participants?

Check all that apply

☒ Email

☒ Website

☒ SMS, Bloomberg, Twitter

Other

106. If the Exchange has market pauses or halts, are the parameters that trigger such events available publicly?

☐ Website

☐ On request

☒ No, we consider market pauses as volatility interruptions, parameters are not publicly available.

Other

107. If the Exchange offers cancel on disconnect functionality, is it enabled by default?

☒ Yes

☐ No

108. If the Exchange has an error policy, what is the approach to "single trade" error trades?

Check all that apply

- ☒ Let trade stand if within defined range
- ☒ Let trade stand if within a specified time limit
- ☒ Adjust price if outside a certain range
- ☒ Cancel/bust trade if outside a certain range



Other

109. If the Exchange has an error policy, what is the approach to "mass trade" error trades?

Check all that apply

- ☒ Let trade stand if within defined range
- ☒ Let trade stand if within a specified time limit
- ☒ Adjust price if outside a certain range
- ☒ Cancel/bust trade if outside a certain range



Other

110. If the Exchange's error trade policy adjusts prices outside of a certain range, what is the approach for determining that range?



Mistrade Rules are defined as per Trading Conditions at the exchange and are provided on the webpage

111. Are all products subject to the same approach or do some products inherit the same range as other similar products? For example, does a calendar spread product inherit the range from the corresponding outright product? Or is the range for that calendar spread product assessed on its own merit?

Price ranges differ across products

112. How often are these ranges reviewed to ensure they offer appropriate protection?

113. How often has the error trade policy been invoked in the past 12 months, and what were the circumstances for each?

around 200 p.a.

114. Does the Exchange have a clearly defined dispute resolution forum in case of error trades?

☒ Yes

☐ No

115. If yes, what is the forum and dispute resolution process

Mistrade Rules are defined as per Trading Conditions at the exchange and are provided on the webpage

Exchange Certification and Testing Environments



The following questions pertain to Exchange Certification and Testing Environments

116. Does the Exchange provide a certification environment for certifying vendor and proprietary trading systems?

☐ Yes

☒ No

117. If the Exchange provides a certification environment, which specific functions must be certified?

Check all that apply

☐ Ability of the system to communicate with the exchange

☐ Specific trading functionality offered by the system

☐ Specific risk functionality offered by the system

☐

Other

118. Does the Exchange provide one certification environment for current production and another environment for the next version of production?

☐ Yes

☒ No

119. If yes, what is the availability of the certification environment?



We provide a Simulation environment for next version of production. If the next version is not yet available, the same environment will have the current version of production. Additionally, we offer a Cloud Simulation where customers may choose which production version is employed.

120. How closely does the certification environment mirror the production environment?

☐

Exact duplicate with mirrored synthetic market activity from production

☒

Exact duplicate without mirrored market activity, only activity from other certification activity

☐

Other

121. Does the Exchange offer a test symbol in the production environment to enable the entry of test trades in production without impacting actual markets?

☐

Yes

☒

No

122. If the Exchange offers a certification environment, which of the following tests can be performed in this environment?

Check all that apply

- ☐ Unit testing
- ☒ Functional testing (integration, regression)
- ☐ Non-functional testing (load, stress, performance, scalability)
- ☒ Acceptance testing

123. If the Exchange offers a certification environment, which of the following actions can be performed in this environment?

Check all that apply

- ☒ Send a test order
- ☒ Send a cancel of the test order
- ☒ Test all order types – blocks, crosses, etc.
- ☒ Receive confirmation of a cancellation of the test order
- ☒ Receive confirmation of partial execution of the test order and cancellation
- ☒ Receive confirmation of full execution of the test order and cancellation
- ☒ Receive confirmation of rejection of the test order
- ☒ Receive confirmation of enabled risk controls working in the environment
- ☒ Test pre-trade risk control functionality

124. How are certification and live environments segregated?

i.e., Are applicable orders (test or live) going over the same wires such that a configuration error can have a major impact?



Separate login details with separate environments

General Information



125. Does the Exchange provide information on the following to the public via website/exchange portal?

Check all that apply

- ☒ Risk control tools provided by the Exchange to Traders
- ☒ Risk control tools provided by the Exchange to Clearing Members/Sponsoring Firms
- ☒ Mechanisms used by the Exchange to protect market integrity

126. Does the Exchange verify Exchange set market integrity control settings to ensure that the values would prevent a market disruption?

☒ Yes

☐ No

127. Does the Exchange test and validate all Exchange provided risk control tools to ensure that they are operating properly?

☒ Yes

☐ No

128. Is there any additional information that you would like to provide on the Exchange's risk control tools?



We would like to highlight certain definition aspects that in the EU could be understood differently. We responded to the EU notion.

We only differentiate between Exchange/Trading participants and Clearing members unlike the options provided by FIA, e.g. individual traders are only allowed to trade as being a part of an Exchange/Trading participant.

Additionally, for the purpose of responding to this survey we consider Sponsoring Firms and Traders as Exchange/Trading participants.

Please be aware that according to MiFID II, Direct Electronic Access is comprised of Direct Market Access and Sponsored Access. The latter is not allowed at the moment in our jurisdiction. In Europe a sponsoring Exchange/Trading participant firm is the one providing other firms the access to the exchange while allowing to use their own or third party infrastructure. Direct Market Access implies using the infrastructure of the Exchange/Trading participant.

Furthermore, we would like to indicate that the first part of the responses to this survey were based on the logic whether the control is mandatory for the user, i.e. Exchange/Trading participant, meaning if the Exchange/Trading participant can configure the parameters. In the second part of the survey (starting from Q99) the logic is whether the control is mandatory from the exchange perspective, meaning configured by the exchange.

On specific topics like the Self-Match Prevention mechanism, we did not answer to Q66 as neither option would reflect how exchange functionality is set, i.e. on a Cross ID level.

In addition, when answering to Q99-103, we refer to European volatility interruption when the survey mentions market pauses and halts. In contrast in Europe suspensions and trading halts could be taken into account as well, however these were not considered in this instance.

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