



July 13, 2015

To: SwapEx Participants

From: SwapEx, LLC

**Re: Advisory Notice 01-15 - SwapEx Trading Procedures and Protocols (SwapEx CFTC Submission #07-15)**

SwapEx Rule 524 (Operation of the Trading System) provides a summary of the execution methods available on the Trading System, including the Order Book and Request for Quote functionalities. It also provides that “[a]dditional information with respect to the operation of the Trading System, the execution methods and credit and risk functionality is provided in the applicable user guide and other specific information that the Company may make available to Participants, Authorized Traders and Authorized Users.” This Advisory Notice provides additional information to the Advisory Notice #01-15 which described SwapEx’s trading procedures and protocols and supplemented the information contained in SwapEx Rule 524. This notice amends and restates Advisory Notice #01-15 to supplement it with further information regarding the methods of execution rules on SwapEx.

Capitalized terms used without definition herein shall have the meanings assigned to them in the SwapEx Rules.

## **Central Limit Order Book (CLOB)**

### **Overview**

SwapEx offers central limit order book functionality that is anonymous at the time of execution and matches orders based on a first-in-first-out basis using price/time priority following normal market conventions. For the most popular instruments, the CLOB supports continuous streaming liquidity (the “Standing CLOB”). For other instruments, SwapEx supports CLOB trading through user-initiated Indications of Interest (“Iol”), enabling central limit order book functionality, as further detailed below, for more customized swap instruments.

Cleared Contracts executed over the CLOB will be delivered to supported Derivatives Clearing Organizations and names of the Participants (and, if applicable, Customers) who are party to the trade will not be revealed to the counterparty to the trade. In order for a Participant or Authorized Trader to participate in trading of Cleared Contracts, the applicable Participant must either be able to self-clear or the Participant or Authorized Trader must have authorization to submit swaps executed on the Trading System for clearing to at least one Clearing Firm.

At present, SwapEx lists both foreign exchange non-deliverable forward (“NDF”) instruments eligible for clearing at a Derivatives Clearing Organization as well as NDFs traded on a non-cleared basis. With respect to uncleared NDFs, a Participant or Authorized Trader will only be able to trade such NDFs on the CLOB with counterparties with whom it has established a credit relationship in the Trading System. With respect to cleared NDFs, a Participant or Authorized Trader will be able to trade such NDFs, through the intermediation of a Clearing Firm, on an anonymous basis with other Participants and/or Authorized Traders who also have a Clearing Firm accepting trades for clearing from them, or who self-clear, on the same Derivatives Clearing Organization. For all NDF trades executed on the CLOB on a non-cleared basis, SwapEx will disclose to each Participant that is counterparty to the trade, the name of the other counterparty to the trade after execution whereas order book trading on a cleared-basis will remain anonymous post-trade for both counterparties.

For an order to be successfully submitted to the Order Book on SwapEx, the Authorized User needs to be properly authenticated and provide the information tagged as relevant for Order Book Trading listed in Appendices 1 and 2. Certain of this information is stored as static data within the SwapEx system, while the remainder of this information must be entered by the Authorized User on an order by order basis.

All instruments listed in SwapEx's product specifications<sup>1</sup> are available for Order Book Trading.

### **Standing CLOB**

Market participants can access the Standing CLOB by using the front-end graphical user interface (GUI) made available by SwapEx or making use of an application program interface (API) enabling the Participant or Authorized Trader to customize its own interface for access to the Standing CLOB. All Orders on the Standing CLOB are delivered (pushed) in near real-time to all Authorized Users who are logged-in to the CLOB. Trades executed on the Standing CLOB are communicated via a ticker on the CLOB, which publishes all transactions executed on the CLOB (without identifying the parties thereto) in near real-time. Participants and Authorized traders can trade on the Standing CLOB book by either taking liquidity (hitting/lifting bids and offers) or adding liquidity (placing orders into the book).

### **Indication of Interest**

Market participants can access the lol functionality on the CLOB by using the front-end graphical user interface (GUI) only. Market participants can raise an lol, which will be communicated to all Authorized Users who are logged-in to the CLOB via the GUI and simultaneously will establish a spontaneous CLOB instance accessible to Authorized Users who are logged-in to the CLOB via the GUI that will continue in existence until the end of the trading day. When submitting an lol, an Authorized User can define the currency pair as well as the value date and fixing date. All lol Orders are delivered (pushed) in near real-time to all Authorized Users who are logged-in to the CLOB via the GUI. Executed trades resulting from an lol are communicated to all Authorized Users logged-in to the CLOB via the GUI on a ticker, which publishes all transactions executed as a result of lols on the CLOB (without identifying the parties thereto) in near real-time. Once a spontaneous lol has been created, all Authorized Users who are logged-in to the CLOB via the GUI may add liquidity in response to the request or, conversely, take liquidity on the order book generated by the lol.

### **Request for Quote (RFQ) Functionality**

SwapEx also supports two Request for Quote ('RFQ') execution styles: Standard RFQ and Reverse RFQ. Listed NDF instruments can be traded through Standard RFQ or Reverse RFQ. All trading through the Standard RFQ functionality and Reverse RFQ functionality is done on a fully-disclosed, attributed basis (i.e., the parties to the trade must have an established relationship with one another as identified to SwapEx in order to trade with one another and a market participant that is party to a trade will be identified to the other market participant who is counterparty to the trade prior to execution).

For a request to be successfully submitted on SwapEx, the Authorized User needs to be properly authenticated and provide the information tagged as relevant for Standard RFQ or Reverse RFQ Trading listed in Appendices 1 and 2. Certain of this information is stored as static data within the SwapEx system, while the remainder of this information must be entered by the Authorized User on an order by order basis. A liquidity provider who provides a quote in response to a request for quote in the Standard RFQ functionality or who streams quotes through the Reverse RFQ functionality is provided the

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<sup>1</sup> Available at: <http://www.swapex.com/swapex/rules-policies-and-notice/contract-types/>

opportunity, after a counterparty has accepted a price quote, to confirm that it remains willing to execute a transaction at that quoted rate. Therefore, such quoted rate may be considered “indicative”. The liquidity provider generally has no more than eight-seconds for Standard RFQ or two-seconds for Reverse RFQ (each, a “review period”) in which to confirm or reject the acceptance of the transaction at the quoted rate. During the review period, (1) the RFQ status will be set to “pending” and the liquidity-taking Authorized User can no longer make any edits to it and (2) the liquidity provider is not permitted to stream the same price quote to any other Authorized User on the Trading Platform. If the quote provided is confirmed by the liquidity provider prior to expiration of the applicable review period, the status of the RFQ will be updated to reflect completion at the transaction at the quoted rate. If the liquidity provider rejects or otherwise does not confirm acceptance of the transaction within the applicable review period noted above, (1) the Trading System will not execute a transaction between the liquidity provider and the recipient of the quote and (2) the RFQ will resume and the party seeking the quote can select another quoted rate to accept.

### Standard RFQ

Through the Standard RFQ functionality, SwapEx allows a market participant to submit a request for quote to certain other market participants with whom the requestor has an established trading relationship on SwapEx. RFQs submitted through the Standard RFQ are filled on an all or none basis.

To initiate a standard RFQ, an Authorized User must connect to the Trading System and select either the “Requests” tab (if the Authorized User is accessing the Trading System through a Graphical User Interface) or submit a “Request” (if the Authorized User is accessing the Trading System through an Application Program Interface).

All instruments listed in SwapEx’s product specifications<sup>2</sup> are available for Standard RFQ Trading.

### Reverse RFQ

Through the Reverse RFQ functionality, (1) a market participant (sender) may stream quotes to certain other market participants (the recipients) who have an established trading relationship with the sender on SwapEx, (2) the recipient of such quote may accept a quote from the sender, and (3) such acceptance will be communicated to the sender, who then will be entitled to accept or reject the trade. RFQs submitted through the Reverse RFQ functionality may be partially filled.

To initiate a Reverse RFQ, the sender must identify those subscribers to whom it will send quotes. To respond to a Reverse RFQ, an Authorized User must either access and respond to the outstanding quotes under the “Markets” tab (if the Authorized User is accessing the Trading System through a Graphical User Interface) or submit an “Order” (if the Authorized User is accessing the Trading System through an Application Program Interface).

The following instruments are available for Reverse RFQ Trading<sup>3</sup>:

Currency Pair	Non-Cleared Tenors	Cleared Tenors
USD/ARS	1M, 2M, 3M	N/A
USD/BRL	1M, 2M, 3M	N/A
USD/CLP	1M, 2M, 3M	N/A
USD/CNY	1M, 2M, 3M, 12M	N/A
USD/COP	1M, 2M, 3M	N/A

<sup>2</sup> Available at: <http://www.swapex.com/swapex/rules-policies-and-notice/contract-types/>

<sup>3</sup> SwapEx may make changes to list of instruments for Reverse RFQ trading on an on-going basis.

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USD/IDR	1M, 2M, 3M	N/A
USD/KRW	1M, 2M, 3M	N/A
USD/MYR	1M, 2M, 3M	N/A
USD/PEN	1M, 2M, 3M	N/A
USD/PHP	1M, 2M, 3M	N/A
USD/RUB	1M, 2M, 3M	N/A
USD/THB	1M, 2M, 3M	N/A
USD/TWD	1M, 2M, 3M	N/A

Appendix 1 – Static Information for trading on SwapEx, by functionality type

Field Name	Required for Trading		
	Standard RFQ	Reverse RFQ	Order Book
Legal Entity Identifier of Participant	X	X	X
CFTC Registration Status of Participant	X	X	X
U.S. Person Status of Participant	X	X	X
Financial Entity Status of Participant	X	X	X
CTI Code	X	X	X
Whether Trades will be allocated	X	X	X

Appendix 2 – Order Specific Information required to be entered into the system for trading on SwapEx, by functionality type

Field Name	Required for Trading		
	Standard RFQ	Reverse RFQ	Order Book
Currency pair	Authorized User must select from the list of SwapEx listed products		
Tenor	An Authorized User can submit a request with either a standard value date (1 month, etc.), or a customized value date	An Authorized User can select an instrument with a standard tenor from a list of pre-defined instrument available in the Trading System	An Authorized User can: (a) Select an instrument with a standard tenor from a list of pre-defined instruments available in the Trading System or an instrument with a customized value date created that day by another Authorized User; (b) Create an instrument with a customized value date ('Indication of Interest') which will be listed in the Order Book from the time entered until 5 pm ET on the day entered, allowing any Authorized Users to submit an Order for that particular instrument.

Field Name	Required for Trading		
	Standard RFQ	Reverse RFQ	Order Book
Fixing Date	An Authorized User can submit a request with either a standard fixing date, or a customized fixing date.	An Authorized User can select an instrument with a standard tenor from a list of pre-defined instrument available in the Trading System	An Authorized User can:  (a) Select an instrument with a standard fixing date from a list of pre-defined instruments available in the Trading System or an instrument with a customized fixing date created that day by another Authorized User;  (b) Create an instrument with a customized fixing date ('Indication of Interest') which will be listed in the Order Book from the time entered until 5 pm ET on the day entered, allowing any Authorized Users to submit an Order for that particular instrument.
Size	An Authorized User must enter into the Trading System, for each Order, either the base or terms quantity.		
Bid or Offer	An Authorized User can enter a request asking for a response from RFQ Maker(s) expressed as a Bid, an Offer, or both a bid and offer.  Additionally, an Authorized User can ask RFQ Makers(s) for both a bid and an offer, but limit their own actions to select one or the other	The Authorized User must select the side of the Order.	

Field Name	Required for Trading		
	Standard RFQ	Reverse RFQ	Order Book
Rate	N/A	The Authorized User must input a price for the Order; except that, for a market order, the ability to input a price in the Trading System is suppressed as the Order will be automatically matched with the best available price on the Order Book / Reverse RFQ.	The Authorized User must input a price for the Order; except that, for a market order, the ability to input a price in the Trading System is suppressed as the Order will be automatically matched with the best available price on the Order Book / Reverse RFQ.
Order type	N/A	<p>Market: a Market Order is an order to buy or sell an instrument at the market bid or offer rate.</p> <p>Limit (default option): a Limit Order is an order to buy or sell an instrument at a rate (the limit rate) that you specify (or better).</p>	
Expiry type	N/A	<p>Good until Cancel Order (default option): Once the order is placed, it will remain in the market until executed or cancelled;</p> <p>IOC (Immediate or Cancelled): Once the order is placed, if it is not immediately executed it will be cancelled;</p> <p>Timed: Once the order is placed, it expires in a defined number of seconds;</p> <p>Custom:</p> <p>LDN-Once the order is placed, it will expire at close of London market on a date that the Authorized User selects.</p> <p>NY-Once the order is placed, it will expire at close of New York market on a date that the Authorized User selects.</p> <p>SGP-Once the order is placed, it will expire at close of Singapore market on a date that the Authorized User selects.</p> <p>TOK-Once the order is placed, it will expire at close of Tokyo market on a date that the Authorized User selects.</p> <p>CD (Custom Date): to configure a custom date, the Authorized User must determine the date and time of the order's expiration.</p>	

Field Name	Required for Trading		
	Standard RFQ	Reverse RFQ	Order Book
Fill type	N/A	Partial fills allowed (default option) or not; Minimum Fill amount (blank by default)	
Allocations <sup>4</sup>	When specified, the Derivatives Clearing Organization and Clearing Firm information is required at the allocation level.	N/A	N/A
Legal Entity of Trade Counterparty <sup>5</sup>	X	X	X
Derivatives Clearing Organization <sup>6</sup>	X	N/A	X
Clearing Firm <sup>7</sup>	X	N/A	X

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<sup>4</sup> Optional field whose purpose is solely for transactions intended to be cleared

<sup>5</sup> If an Authorized User is permissioned to trade for multiple legal entities, such Authorized User must select the legal entity for which it is trading at the time the Authorized User submits the order. The Trading System maintains, as static data, the list of legal entities for which a particular Authorized User is permissioned to trade.

<sup>6</sup> Only required for transactions intended to be cleared. If an Authorized User is authorized to submit trades on behalf of a Participant, Authorized Trader or Customer for clearing to multiple Derivatives Clearing Organizations and / or Clearing Firms, the Authorized User must select the applicable Derivatives Clearing Organization and/or Clearing Firm at the time the order is submitted. The Trading System maintains, as static data, the list of Derivatives Clearing Organizations to which a particular Authorized User is authorized to submit trades for clearing. Although SwapEx currently only offers instruments available for clearing at LCH Clearnet Limited or uncleared, it intends to support the trading of instruments cleared at other Derivatives Clearing Organizations in the future.

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