

CurveGlobal Markets

Guide to Pre-Trade Validation

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CONTENTS

1	Revision history	3
2	Overview	4
2.1	Definitions	4
2.1.1	Risk Manager	4
2.1.2	Managed Entity	4
2.1.3	Risk Counters	4
2.1.4	Risk Limit Thresholds	4
2.1.5	Pre-Trade Validations	5
2.1.6	Risk Limit Usage	5
2.1.7	Order	5
2.1.8	Quote	5
2.1.9	Instrument Series	5
2.1.10	Instrument Group	5
3	Setting Pre-Trade Validations	6
3.1	Obtaining access and testing of PTVS	6
3.2	How to test the PTVS	6
3.3	Defining Managed Entities	6
3.4	How to set Pre-Trade Validations in SOLA	6
4	Pre-Trade Validations	7
4.1	Maximum Order Quantity Limit for orders and quotes	7
4.2	Maximum Order Quantity limit for negotiated transactions	7
4.3	Maximum Notional Value limit for orders and quotes	7
4.4	Maximum Notional Value limit for Negotiated Transactions	7
4.5	Price Collar limit for orders and quotes	7
4.6	Position limits (<i>on executed trades</i>)	8
4.7	Exposure Limits (on open orders plus executed trades)	8
4.8	Granularity of Pre-Trade Validations	8
4.9	Access to Kill Switch functionality	8
4.10	Access to Market Maker Quoting Protection (MMQP)	9
5	Risk counters	10
5.1	Instrument Risk Counters	10
5.2	Instrument Group Risk Counters	11
6	Execution of Pre-Trade Validations	13
7	Order Status, error code and risk usage notifications	14
7.1	Order status codes	14
7.2	Risk Usage Notifications	15
8	Contacts	16
8.1	CurveGlobal	16
8.2	LCH	16

1 REVISION HISTORY

Date	Version	Notes
September 2016	1.0	Document creation
November 2016	2.0	Updated version: extension to LSEDM Equity Derivatives
December 2017	3.0	Amendments related to SOLA 11 technical deployment
June 2019	4.0	Rebranded as CurveGlobal Markets
December 2019	5.0	Removed references to equity derivatives and updated layout

2 OVERVIEW

The Pre-Trade Validation Service (PTVS) offered by CurveGlobal Markets complements the risk control systems in place by CurveGlobal Markets participants to control order flow activity.

In particular, PTVS provides an additional tool for:

- General Clearing Members (GCMs) to manage the cleared risk exposure generated by the trading activity of their NCPs;
- LSE Members offering Direct Market Access (DMA) to control the risk related to the trading activity of their DMA clients;
- LSE Members to monitor the risk associated to their own trading activity.

The PTVS is available for all products listed on CurveGlobal Markets, via both SOLA native APIs (SAIL) and a dedicated GUI.

The PTVS can be configured by a GCM or an LSE Member (the "Risk Manager") to constrain its own trading activity or the trading activity of its controlled client (the "Managed Entity"), in case of any breach of pre-defined thresholds as configured by the Risk Manager. Such constraints range from the cancellation of a single incoming order to the cancellation of all resting orders and quotes, plus a complete freeze of the technical connection to the matching engine, thereby preventing the client from inserting any new order or quote.

This document provides an overview of the functionalities provided by the PTVS, including details of the Pre-Trade Validation rules available for the users of the service.

2.1 DEFINITIONS

2.1.1 Risk Manager

A Risk Manager is an LSE Member that wishes to control the level of risk determined by the order flow of its own activity or that of one of its NCPs/DMA clients (as the case may be) trading products listed on CurveGlobal Markets.

The PTVS allows the Risk Manager to set Risk Limit Thresholds for a Managed Entity, at the level of a specific Instrument Series or for an Instrument Group.

2.1.2 Managed Entity

A Managed Entity identifies either an entire Member Firm (defined by its Member ID), a single TraderID or a group of Trader IDs of the same Firm, that are subject to a common set of Pre-Trade Validations as defined by a Risk Manager¹.

A Managed Entity could be subject to Pre-Trade Validations by more than one Risk Manager. In this case, the more stringent limits will apply.

2.1.3 Risk Counters

Risk Counters are metrics that are calculated internally by the trading system and updated, as necessary, on order entry, modification and cancellation, and on trade execution. Risk Counters are compared with the respective Risk Limit Thresholds in order to control the level of risk accumulated by a Managed Entity.

Risk Counters are always reset to zero before the start of a new trading day.

A full description of the Risk Counters offered by the PTVS is provided in Section 5.

2.1.4 Risk Limit Thresholds

Risk Limit Thresholds are the values, as defined by a Risk Manager, representing the maximum value that a Risk Counter can assume before triggering a pre-defined action that will limit the trading activity of a Managed Entity. A full description of the actions triggered by the breach of each Risk Limit Threshold is provided in Section 6.

¹ In case a Group of Trader IDs of the same Firm is configured in order to be subject to the same set of Pre-Trade Validations, it is referred to as a "Trader Team". Moreover, it is also possible to configure a TraderID as responsible for a Trader Team (aka "Team lead") and to which all the other TraderIDs will be referenced.

Specific thresholds related to the Market Maker quoting protection (MMQP) functionality are referred to as “MMP Limits”. For a full description of the MMQP and its related risk controls, please refer to the “CurveGlobal Markets - Bulk Quoting Protection Description” document available on the Global Markets website (<http://www.lseg.com/derivatives/document-library>).

2.1.5 Pre-Trade Validations

Pre-Trade Validations are the controls, executed on the SOLA trading system, which compare a Risk Counter to its related Risk Limit Threshold, trigger a pre-defined action on the trading activity of the Managed Entity in case of breach of the relevant Risk Limit Thresholds.

The following Pre-Trade Validations are available in the PTVS:

- Max Order Quantity limit for orders and quotes;
- Max Order Quantity limit for Negotiated Transactions (cross/bundled/third party orders);
- Max Notional Value limit for orders and quotes;
- Max Notional Value limit for Negotiated Transactions (cross/bundled/third party orders);
- Price Collar limit for order and quotes;
- Position limit on executed trades (net long/short position) during the day, expressed in quantity terms;
- Exposure limit on open orders (excluding quotes) plus executed trades (net long/short position) during the day, expressed in quantity terms;
- Kill Switch functionality, allowing the Risk Manager to control the trading activity of its Managed Entity by removing all its resting orders/quotes and preventing order/quote entry and modification;
- Access to the MMQP functionality, allowing the Risk Manager to specifically control the Managed Entity’s quoting activity based on bulk quotes.

2.1.6 Risk Limit Usage

In order to provide real-time information on the level of risk accumulated by a Managed Entity, the PTVS disseminates messages related to the “usage” (expressed as a percentage of the related Risk Limit Thresholds as defined by its Risk Manager) of its Position and Exposure limits.

Details regarding the available alerts and rules for the dissemination of Risk Limit Usage messages through the SOLA protocols are described in Section 6.

2.1.7 Order

An Order means an offer to buy or sell a number of Contracts submitted to an Order Book. The minimum information content of an order includes i) the instrument, ii) the quantity, iii) the price, iv) the dealing capacity (for own or customer account), v) the type of transaction (buy or sell) and vi) the market mechanism and validity types (aka “method of execution”).

2.1.8 Quote

A quote means a bid or bids and/or offer or offers entered using the Bulk Quoting functionality.

2.1.9 Instrument Series

An Instrument Series means a single tradable derivatives instrument, uniquely identified by an ISIN code and by an Instrument ID in SOLA.

2.1.10 Instrument Group

An Instrument Group means an ensemble of Instrument Series on the same underlying with the same delivery type (i.e. cash or physical delivery) and instrument type (i.e. futures or options).

3 SETTING PRE-TRADE VALIDATIONS

3.1 OBTAINING ACCESS AND TESTING OF PTVS

LSE Member Firms interested in the PTVS should contact their Technical Account Manager to be enabled for Pre-Trade Validations.

The Risk Manager will be required to fill in a Pre-Trade Risk Customer Request Form for each Managed Entity whose order flow he wants to control, indicating the Trader ID / Group of Trader IDs to be assigned pre-trade validation controls. The Technical Account Management team will provide the customer with the relevant connectivity details.

Relevant content details are available in Section 8.

3.2 HOW TO TEST THE PTVS

Members that are developing software via the SAIL gateway to manage the PTVS must certify their software in accordance with the LSEG Connectivity Policy before using the software in production. Additionally, Members are required to perform at least two certification tests per software within a 12 month period.

At least one test must be a full certification test whilst the second test can be an email confirming the software has not changed.

Software Certification Guides can be found in the [CurveGlobal Markets Document Library](#).

Members using an accredited ISV to manage pre-trade validations will not be required to perform any certification test before using it in production. However, Members are strongly encouraged to test in the Customer Development Service (CDS) to ensure their systems and processes are functioning as expected.

Members should contact their Technical Account Manager or the Technical Account Management team to discuss software certification and testing.

3.3 DEFINING MANAGED ENTITIES

Based on information provided by the Risk Manager in the Pre-Trade Risk Customer Request Form, the Technical Account Management team will set up the Managed Entity.

Configuration relevant to a Managed Entity will be effective from the first Trading Day after the changes are confirmed by the Technical Account Management team.

It is responsibility of the Risk Manager to set up and manage the Pre-Trade Validations for each Managed Entity, and to inform the Managed Entity of the controls that have been applied to its trading activity.

Independently of the activation of the PTV functionality, according to CurveGlobal Markets' Rules, Members are required to establish, maintain and enforce adequate systems and controls to prevent erroneous orders in terms of price, quantity and frequency.

3.4 HOW TO SET PRE-TRADE VALIDATIONS IN SOLA

Once the required Managed Entities are configured, SOLA native APIs (SAIL) offer a set of dedicated messages to a Risk Manager in order to:

- define which Pre-Trade Validations must be executed for each Managed Entity;
- set up and update the related Risk Limit Thresholds. Configured thresholds can be updated in real-time, with immediate effectiveness.

The following messages are available to define limits in the SOLA native APIs (SAIL) and to get updates on Risk Limits usage:

- MK: message used to configure Risk Limit Thresholds;
- MQ: message used to configure MMP Limits;
- RT: message used to enable the Kill Switch functionality.

For full details on available SAIL messages implementing the Pre-Trade Validation Service, please refer to the SAIL Specification document available on [CurveGlobal Markets Document Library](#).

4 PRE-TRADE VALIDATIONS

This section describes the Pre-Trade Validations which are executed by the PTVS on incoming orders and/or quotes of a Managed Entity, according to the configurations and Risk Limit Thresholds defined by the Risk Manager for each Managed Entity.

Please note that, for the purpose of calculating Position and Exposure limits for Interest Rate Derivatives listed on CurveGlobal Markets, the following are out of scope:

- cross/bundled/third party orders and trades;
- iceberg orders and trades (since not available in these products).

On the contrary, please note as well that spread based limits are available for Interest Rate Derivatives only.

4.1 MAXIMUM ORDER QUANTITY LIMIT FOR ORDERS AND QUOTES

The system allows a Risk Manager to specify a maximum quantity for orders and quotes inserted by the Managed Entity in the SOLA trading system².

In case the incoming order/quote has a quantity greater than the specified threshold, it will be automatically rejected³.

Relevant Risk Limit Thresholds: MaxOrderQuantity.

4.2 MAXIMUM ORDER QUANTITY LIMIT FOR NEGOTIATED TRANSACTIONS

The system allows a Risk Manager to specify a maximum order quantity for cross/bundled/third party orders inserted by the Managed Entity in the trading system². In case the incoming order falling in one of these categories has a quantity greater than the specified threshold, it will be automatically rejected.

Relevant Risk Limit Thresholds: Max Order Quantity on Cross/Bundled/Third Party Orders.

4.3 MAXIMUM NOTIONAL VALUE LIMIT FOR ORDERS AND QUOTES⁴

The system allows the Risk Manager to specify a maximum notional value for orders and quotes inserted by each Managed Entity in the SOLA trading system³.

In case the incoming order / quote has a notional value greater than the specified threshold, it will be automatically rejected⁴.

Relevant Risk Limit Thresholds: MaxOrderNotionalValue

4.4 MAXIMUM NOTIONAL VALUE LIMIT FOR NEGOTIATED TRANSACTIONS

The system allows the Risk Manager to specify a maximum notional value for order to execute Negotiated Transactions (cross / bundled / third party orders) inserted by each Managed Entity in the SOLA trading system.

In case the incoming order falling in one of these categories has a notional value greater than the specified threshold, it will be automatically rejected.

Relevant Risk Limit Thresholds: MaxNotionalValue for order to execute Negotiated Transactions (cross / bundled / third party orders).

4.5 PRICE COLLAR LIMIT FOR ORDERS AND QUOTES

The system allows the Risk Manager to specify a set of price interval parameters at Instrument series level, in addition to Exchange-based dynamic price deviation controls, allowing to automatically reject orders and quotes inserted by each Managed Entity which are not meeting those parameters.

In particular, for each Instrument series, the Risk Manager will be able to define a reference price and a maximum upward / downward divergence by this (expressed in percentage points).

Relevant Risk Limit Thresholds: HighLimitPrice and LowLimitPrice

² No Risk Counter is associated to Maximum Order Quantity Limits, since it applies to a single incoming order.

³ Each quote in a bulk quote is individually validated. This means that, if a quote has a quantity greater than the related specified threshold.

4.6 POSITION LIMITS (ON EXECUTED TRADES)

The system allows a Risk Manager to specify a set of limits to control the maximum position accumulated during the trading day by the Managed Entity on executed trades.

On execution of a trade, in case the long / short position accumulated by the Managed Entity goes outside the specified thresholds, the system will remove all the booked orders (at the given granularity) on the relevant side of the order book and prevent any new order and quote from entering the system that could generate a further increase of the controlled long / short position. Thus, in case the MaxTradedLong threshold is breached, all resting buy orders are cancelled and no new buy orders can be inserted in the system.

Please note that, as described above, Position Limits are triggered only after the specified Risk Thresholds have been passed.

For Interest Rate Derivatives, specific Position Limits are available for strategies, expressed in term of “equivalent spreads” (see “TradedSpreads” counter in the “Group Risk Counters” table under Section 5.2).

Relevant Risk Counters: TradedNet, TradedNetLong, TradedNetShort, TradedSpreads.

Relevant Risk Limit Thresholds: MaxTradedLong, MaxTradedShort, MaxTradedSpreads.

4.7 EXPOSURE LIMITS (ON OPEN ORDERS PLUS EXECUTED TRADES)

The system allows a Risk Manager to specify a set of limits to control the maximum exposure accumulated by the Managed Entity during the trading day, based on current open (unexecuted) orders⁵ inserted in the SOLA trading system by the Managed Entity plus all executed trades.

When a new order enters the market, in case the long / short exposure for the Managed Entity goes outside the specified thresholds, the incoming order is rejected.

Unexecuted quotes are not included in the calculation of Risk Counters for Exposure Limits. In order to control the quoting activity of a Managed Entity, please refer to the “Access to Market Maker quoting protection” under Section 4.10.

Implied orders from strategies are not included in Risk Counters at Instrument Series granularity, while implied trades are taken into account (for full definitions and calculation rules for the Risk Counters, see Section 5). Exposure Limits are strict limits in the sense that they are triggered to prevent the threshold value being surpassed.

For Interest Rate Derivatives, specific Exposure Limits are available for strategies, expressed in terms of “equivalent spreads” (see “ExposedSpreads” counter in the “Group Risk Counters” table under Section **Error! Reference source not found.**).

Relevant Risk Counters: BookedLong, BookedShort, BookedStrategySpreads, ExposedLong, ExposedShort, ExposedSpreads.

Relevant Risk Limit Thresholds: MaxExposedLong, MaxExposedShort, MaxExposedSpreads.

4.8 GRANULARITY OF PRE-TRADE VALIDATIONS

For each Managed Entity, Pre-Trade Validations (with specific Risk Counters and dedicated Risk Limit Thresholds) can be configured at the level of:

- Instrument Series;
- Instrument Group.

Pre-Trade Validations for strategies are available at Instrument Group level only⁶.

In case there are Maximum Order Quantity / Notional Value limits defined at both Instrument Series and Instrument Group level, the most restrictive limit will prevail.

4.9 ACCESS TO KILL SWITCH FUNCTIONALITY

The Kill Switch (KS) functionality allows the Risk Manager to:

- prevent the Managed Entity entering or modifying any of its order or quote in the SOLA trading system, and

⁵ Quotes inserted by the Managed Entity are not taken into consideration for the Exposure Limit’s calculation.

⁶ All Risk Spread counters are calculated at the level of the Instrument Group to which the legs belong to and not at the Strategy Group level. Multi Group Strategies are not included in Risk Spread counters.

- at the same time, remove all resting orders (including orders to execute Negotiated Transactions) and quotes of the Managed Entity

by sending the Risk Master Switch (RT) message.

Subject to RM user configuration, KS functionality may allow to disable a TraderID or a predefined Group of TraderIDs.

Following KS triggering:

- Market Makers⁷ will keep receiving real-time alarms related to the quoting obligations, if applicable, and
- the affected TraderIDs can be re-activated by Borsa Italiana upon request of the Risk Manager.

Risk Managers are requested to pay the necessary attention when triggering KS functionality, in order to avoid situations likely to hinder orderly trading (for example, activating the aforementioned functionality close to the end of the auction phases).

4.10 ACCESS TO MARKET MAKER QUOTING PROTECTION (MMQP)

Risk Managers have the possibility to define parameters of the “Market Maker quoting protection” (MMQP) available in SOLA for Market Makers (MM) in order to control the behaviour of their applications. Through the MMQP, the trading system can be instructed to delete all resting quotes in case, during a specified time interval, excessive trading activity against the MM is taking place.

For a full description of the MMQP and its related risk controls, please refer to the related documentation available in the [CurveGlobal Markets Document Library](#).

Since the MMQP is available to both Market Makers and their Risk Managers, in case two sets of limits are applied to the same Managed Entity, the most restrictive configurations will apply.

The following parameters can be configured by a Risk Manager:

Field Name	Description
<i>MmpMaxNbTrades</i>	Maximum number of trades that can be executed by the MM in the time interval specified by the parameter “MmpCalculationTimeInterval”.
<i>MmpMinTradeVolume</i>	Minimum size of the trades that must be counted to the purposes of the maximum number of trades control, as described above.
<i>MmpMaximumTradedVolume</i>	Maximum traded volume that can be executed by the MM in the time interval specified by the parameter “MmpCalculationTimeInterval”.
<i>MmpMaximumTradedValue</i>	Maximum traded value that can be executed by the MM in the time interval specified by the parameter “MmpCalculationTimeInterval”.
<i>MmpCalculationTimeInterval</i>	Defines the time interval during which the protection rules defined above must be verified.

Please note that default values for the above parameters are also set at Exchange level. The Risk Manager must set values that are more stringent than the ones set by the Exchange, otherwise the requested modification will be rejected.

For more information about the default values for the above parameters applied at Exchange level, please refer to the “CurveGlobal Markets Trading Services Description” document available on the [CurveGlobal Markets Document Library](#).

Please note as well that the Risk Manager is allowed to leave some values empty (in this case the Exchange level will be applied by default).

⁷ The term “Market Makers” refers to all different roles i.e. Primary Market Makers and Designated Market Makers.

5 RISK COUNTERS

5.1 INSTRUMENT RISK COUNTERS

Field	Description
<i>TradedNet</i>	<p>Counter maintaining the net traded position of the Firm or Trader team. Incremented on creation of long positions, decremented on creation of short positions.</p> $T_{Ni} = T_{Li} - T_{Si}$ <p>where: T_{Ni} = Net traded positions for instrument i T_{Li} = Long traded positions for instrument $i = \sum_{side=long} t_i$ T_{Si} = Short traded positions for instrument $i = \sum_{side=short} t_i$ t_i = Trade for instrument i either as outright or leg of a strategy</p>
<i>BookedLong</i>	<p>Counter maintaining the number of booked orders on the long side. Incremented on entry of Buy order on the Instrument; Buy orders on Strategies with this Instrument as a buy-side leg; and Sell orders on Strategies with this Instrument as a sell-side leg. Decrementing when the order is cancelled or trades.</p> $O_{Li} = \sum oO_{Li} + \sum oS_{L L_{Li}} + \sum oS_{S L_{Si}}$ <p>where: O_{Li} = Booked Long Orders for instrument i oO_{Li} = Booked Outright Long Order for instrument i $oS_{L L_{Li}}$ = Booked Strategy Long Order, Long on leg i $oS_{S L_{Si}}$ = Booked Strategy Short Order, Short on leg i</p>
<i>BookedShort</i>	<p>Same as booked long, for the short side.</p> $O_{Si} = \sum oO_{Si} + \sum oS_{L L_{Si}} + \sum oS_{S L_{Li}}$ <p>where: O_{Si} = Booked Short Orders for instrument i oO_{Si} = Booked Outright Short Order for instrument i $oS_{L L_{Si}}$ = Booked Strategy Long Order, Short on leg i $oS_{S L_{Li}}$ = Booked Strategy Short Order, Long on leg i</p>
<i>ExposedLong</i>	<p>Calculated on demand as the sum of BookedLong + TradedNet.</p> $E_{Li} = \max(0, T_{Ni} + O_{Li})$ <p>where: E_{Li} = Long Exposure for instrument i T_{Ni} = Net traded positions for instrument i O_{Li} = Booked Long Orders for instrument i</p>
<i>ExposedShort</i>	<p>Calculated on demand as the sum of BookedShort – TradedNet.</p> $E_{Si} = \max(0, O_{Si} - T_{Ni})$ <p>where: E_{Si} = Short Exposure for instrument i T_{Ni} = Net traded positions for instrument i O_{Si} = Booked Short Orders for instrument i</p>

5.2 INSTRUMENT GROUP RISK COUNTERS

Field	Description
<i>TradedNetLong</i>	<p>Counter maintaining the sum of long TradedNet on all Instruments in this Group.</p> $T_{Lg} = \sum_{\forall i \in g} \max(0, T_{Ni})$ <p>where: T_{Lg} = Long Traded positions for group g T_{Ni} = Net Traded position for instrument i</p>
<i>TradedNetShort</i>	<p>Counter maintaining the sum of absolute short TradedNet on all Instruments in this Group.</p> $T_{Sg} = \sum_{\forall i \in g} \min(0, T_{Ni}) $ <p>where: T_{Sg} = Short Traded positions for group g T_{Ni} = Net Traded position for instrument i</p>
<i>BookedLong</i>	<p>Counter maintaining the sum of Booked Long orders on all Instruments in the Group (<i>orders on strategies are not considered</i>).</p> $O_{Lg} = \sum_{\forall i \in g} \sum oO_{Li}$ <p>where: O_{Lg} = Booked Long Orders for group g oO_{Li} = Booked Outright Long Order for instrument i</p>
<i>BookedShort</i>	<p>Counter maintaining the sum of Booked Short orders on all Instruments in the Group (<i>orders on strategies are not considered</i>).</p> $O_{Sg} = \sum_{\forall i \in g} oO_{Si}$ <p>where: O_{Sg} = Booked Short Orders for group g oO_{Si} = Booked Outright Short Order for instrument i</p>
<i>BookedStrategySpreads</i>	<p>Counter maintaining the booked volume of strategy orders weighted by a <i>spread factor</i>.</p> $X_g = \sum oS_g * sf$ <p>where: X_g = Booked Strategy Spreads for group g oS_g = Booked Strategy Orders for group g sf = spread factor, depending on the strategy $= \min(\sum L_s , \sum L_L)$ L_s = Negative leg ratio factor L_L = Positive leg ratio factor</p> <p>The spread factor is equal to 1 for Calendar Spreads and to 2 for Butterflies (Buy N contracts at first expiry date, sell 2*N contracts at far expiry date, buy N contracts at yet farther expiry date) and Condors (Buy N contracts at first expiry date, sell N contracts at later expiry date, sell yet N contracts at yet later expiry date, buy N contracts at yet later expiry date).</p>
<i>TradedNet</i>	<p>Counter calculated as the difference between TradedNetLong and TradedNetShort</p> $T_{Ng} = T_{Lg} - T_{Sg}$ <p>where: T_{Ng} = Net traded positions for group g T_{Lg} = Long Traded positions for group g T_{Sg} = Short Traded positions for group g</p>
<i>TradedSpreads</i>	<p>Counter calculated as the smallest value between the TradedNetLong positions and TradedNetShort positions.</p>

	$Y_g = \min(T_{Lg}, T_{Sg})$ <p>where: Y_g = Traded Spreads for group g T_{Lg} = Net Long traded positions for group g T_{Sg} = Net Short traded positions for group g</p>
<i>ExposedLong</i>	<p>Counter calculated as TradedNet + BookedLong.</p> $E_{Lg} = T_{Ng} + O_{Lg}$ <p>where: E_{Lg} = Long Exposure for group g T_{Ng} = Net traded positions for group g O_{Lg} = Booked Long Orders for group g</p>
<i>ExposedShort</i>	<p>Counter calculated as BookedShort - TradedNet.</p> $E_{Sg} = O_{Sg} - T_{Ng}$ <p>where: E_{Sg} = Short Exposure for group g T_{Ng} = Net traded positions for group g O_{Sg} = Booked Short Orders for group g</p>
<i>ExposedSpreads</i>	<p>Counter calculated as BookedStrategySpreads + TradedSpreads.</p> $Z_g = Y_g + X_g$ <p>where: Z_g = Spread Exposure for group g Y_g = Traded Spreads for group g X_g = Booked Strategy Spreads for group g</p>

6 EXECUTION OF PRE-TRADE VALIDATIONS

Messages submitted to the SOLA trading system will pass through the PTVS before reaching the electronic order book. Pre-Trade Validations are specific to the orders and/or quotes inserted by a Managed Entity and are in addition to the standard Exchange-based controls in place at the Exchange level, which are implemented and enforced for all Member Firms.

On order / quote reception, the following sequence of actions are performed by SOLA:

- 1) check if any Position or Exposure limit for the relevant Managed Entity (on the relevant Group and/or Instrument) has been already reached:
 - in case the limit has been already reached, the incoming order / quote is rejected⁸;
- 2) check if Exchange-based controls are passed:
 - in case Exchange-based controls are not passed, the incoming order / quote is rejected;
- 3) check if the Maximum Quantity and Notional Value limits for the relevant Managed Entity are breached (on the relevant Group and/or Instrument series):
 - in case one of the above limits is breached, the incoming order / quote is rejected;
- 4) If the above validations are passed:
 - apply Circuit Breaker to the incoming quote;
 - apply Self Execution Prevention (SEP) to the incoming order/quote;
 - if none of the two controls above require cancellation of the incoming order, the order is directed to the order book;
- 5) before an incoming order enters the order book, the counters related to an Exposure Limit are recalculated;
 - if, following recalculation of the Risk Counters, an Exposure Limits is breached, the actions described under paragraph 4.7 are triggered, including rejection of the incoming order;
- 6) if the previous check is passed, the incoming order reaches the order book. Should the incoming order aggress the order book, generating one or more trades:
 - the counters related to Position Limits are updated;
 - if, following recalculation of the Risk Counters, a Position Limit is breached, the actions described under paragraph 4.6 are triggered;
- 7) Risk Usage Messages are disseminated to both Risk Manager and the related Managed Entity.

The Risk Counters are also updated (and the related actions are executed as described within Section **Error! Reference source not found.**), in the following cases:

- order modifications and cancellations;
- trade executions;
- updates of the Risk Limit Thresholds by the Risk Manager.

⁸ Quotes are individually validated. For this reason, the rejection of a quote does not imply the whole bulk quote to be rejected, and validations continue with the following quote contained in the bulk quote message.

7 ORDER STATUS, ERROR CODE AND RISK USAGE NOTIFICATIONS

7.1 ORDER STATUS CODES

Where a Risk Limit Threshold is breached, dedicated codes are disseminated by the SOLA native APIs (SAIL) to identify the reason of order rejection / cancellation. In the SAIL protocol, error codes are also disseminated in order to allow the Risk Manager to identify whether the relevant Pre-Trade Validation rule has been breached at the Firm vs. Trader level, or at Instrument Group vs. Instrument Series level.

Data type	Error code	Error message
<i>SailOrderStatus/ FixOrdStatus</i>	T	Order eliminated due to risk limit exceeded
	R	Order eliminated due to risk master switch
<i>SailErrorCode</i>	3099	Pre-Trade Validation disabled
	3100	Order Quantity Limit exceeded at the trader/instrument level
	3101	TradedLong limit exceeded at the trader/instrument level
	3102	TradedShort limit exceeded at the trader/instrument level
	3103	ExposedLong limit exceeded at the trader/instrument level
	3104	ExposedShort limit exceeded at the trader/instrument level
	3107	Order Value limit exceeded at Trader / Instrument level
	3108	Order Price outside High/Low limits at Trader / Instrument level
	3110	Order Quantity Limit exceeded at the trader/group level
	3111	TradedLong limit exceeded at the trader/group level
	3112	TradedShort limit exceeded at the trader/group level
	3113	ExposedLong limit exceeded at the trader/group level
	3114	ExposedShort limit exceeded at the trader/group level
	3115	TradedSpreads limit exceeded at the trader/group level
	3116	ExposedSpreads limit exceeded at the trader/group level
	3117	Order Value limit exceeded at the Trader / Group level
	3120	Order Quantity Limit exceeded at the Firm/instrument level
	3121	TradedLong limit exceeded at the firm/instrument level
	3122	TradedShort limit exceeded at the firm/instrument level
	3123	ExposedLong limit exceeded at the firm/instrument level
	3124	ExposedShort limit exceeded at the firm/instrument level
	3127	Order value limit exceeded at the Firm / Instrument level
	3128	Order Price outside High/Low limits at the Firm / Instrument level
	3130	Order Quantity Limit exceeded at the firm/group level
	3131	TradedLong limit exceeded at the firm/group level
	3132	TradedShort limit exceeded at the firm/group level
	3133	ExposedLong limit exceeded at the firm/group level
	3134	ExposedShort limit exceeded at the firm/group level
	3135	TradedSpreads limit exceeded at the firm/group level
	3136	ExposedSpreads limit exceeded at the trader/group level
	3137	Order Value limit exceeded at the Firm / Group level
3200	Risk Limit invalid for current group configuration	
3201	Spread Risk Limits cannot be defined for instruments	
3202	Risk Limit cannot be defined for strategy groups	
3203	Price Risk Limits cannot be defined for Groups	

7.2 RISK USAGE NOTIFICATIONS

Risk Usage Notification messages are sent following a recalculation of the Risk Counters, in order to alert Risk Managers and related Managed entity of the current usage of usage of the allowed Risk Limit Threshold by the Managed Entity itself.

PTVS Exchange configuration will result in alerts being disseminated when the Risk Limit Threshold has been “used” at 50%, 60%, 70% and further 10% intervals of its full value, as may be defined by the Risk Manager.

Risk Managers and related Managed Entity are required to subscribe to dedicated messages in the SOLA trading system for receiving these alerts. In particular, the MN message disseminates the percentage of a Risk Limit Threshold, when it exceeds certain pre-defined values at the system level.

8 CONTACTS

8.1 CURVEGLOBAL

For **CurveGlobal** support please contact:

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Functional Queries, Client On-Boarding, Technical Advice

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Client Support Team

Incident Management (Live Service and CDS)

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8.2 LCH

For **LCH** enquiries please contact:

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