

Chapter 11

Dealing and managing

11.5A Record keeping: client orders and transactions

11.5A.1 **R**

- (1) Subject to (2), in this chapter provisions marked "UK" apply to a *firm's* business other than *MiFID* business as if they were *rules*.
- (2) Provisions in this chapter which are marked "UK" do not apply to *corporate finance* business carried on by a *firm* which is not a *MiFID* investment firm.

11.5A.2 **UK**

Recording initial orders received from clients

74 An investment firm shall, in relation to every initial order received from a client and in relation to every initial decision to deal taken, immediately record and keep at the disposal of the competent authority at least the details set out in Section 1 of Annex IV [reproduced below at ■ COBS 11.5A.4UK] to this Regulation to the extent they are applicable to the order or decision to deal in question.

Where the details set out in Section 1 of Annex IV to this Regulation are also prescribed under Articles 25 and 26 of Regulation No (EU) 600/2014, these details should be maintained in a consistent way and according to the same standards prescribed under Articles 25 and 26 of Regulation No (EU) 600/2014.

11.5A.3 **UK**

Record keeping in relation to transactions and order processing

75 Investment firms shall, immediately after receiving a client order or making a decision to deal to the extent they are applicable to the order or decision to deal in question, record and keep at the disposal of the competent authority at least the details set out in Section 2 of Annex IV [reproduced below at ■ COBS 11.5A.5UK].

Where the details set out in Section 2 of Annex IV are also prescribed under Articles 25 and 26 of Regulation No (EU) 600/2014, they shall be maintained in a consistent way and according to the same standards prescribed under Articles 25 and 26 of Regulation (EU) No 600/2014.

11.5A.4 **UK**

Minimum details to be recorded in relation to client orders and decisions to deal

Annex IV Section 1 of the *MiFID Org Regulation* makes provision for record keeping of *client* orders and decisions to deal.

1.Name and designation of the client

- 2.Name and designation of any relevant person acting on behalf of the client
- 3.A designation to identify the trader (Trader ID) responsible within the investment firm for the investment decision
- 4.A designation to identify the algorithm (Algo ID) responsible within the investment firm for the investment decision;
- 5.B/S indicator;
- 6.Instrument identification
- 7.Unit price and price notation
- 8.Price
- 9.Price multiplier
- 10.Currency 1
- 11.Currency 2
- 12.Initial quantity and quantity notation
- 13.Validity period
- 14.Type of the order
- 15.Any other details, conditions and particular instructions from the client
16. The date and exact time of the receipt of the order or the date and exact time of when the decision to deal was made. The exact time must be measured according to the methodology prescribed in Commission Delegated Regulation (EU) 2017/574 of 7 June 2016 supplementing Directive 2014/65/EU of the European Parliament and of the Council with regard to regulatory technical standards for the level of accuracy of business clocks or in technical standards made by the Financial Conduct Authority under paragraph 33 of Schedule 1.

Minimum details to be recorded in relation to transactions and order processing

11.5A.5 UK

- 1.Name and designation of the client
- 2.Name and designation of any relevant person acting on behalf of the client
- 3.A designation to identify the trader (Trader ID) responsible within the investment firm for the investment decision
- 4.A designation to identify the Algo (Ago ID) responsible within the investment firm for the investment decision
- 5.Transaction reference number
- 6.A designation to identify the order (Order ID)

- 7.The identification code of the order assigned by the trading venue upon receipt of the order
- 8.A unique identification for each group of aggregated clients' orders (which will be subsequently placed as one block order on a given trading venue). This identification should indicated "aggregated_X" with X representing the number of clients whose orders have been aggregated
- 9.The segment MIC code of the trading venue to which the order has been submitted
- 10.The name and other designation of the person to whom the order was transmitted
- 11.Designation to identify the Seller & the Buyer
- 12.The trading capacity
- 13.A designation to identify the Trader (Trader ID) responsible for the execution
- 14.A designation to identify the Algo (Algo ID) responsible for the execution
- 15.B/S indicator;
- 16.Instrument identification
- 17.Ultimate underlying
- 18.Put/Call identifier
- 19.Strike price
- 20.Upfront payment
- 21.Delivery type
- 22.Option style
- 23.Maturity date
- 24.Unit price and price notation
- 25.Price
- 26.Price multiplier
- 27.Currency 1
- 28.Currency 2
- 29.Remaining quantity
- 30.Modified quantity
- 31.Executed quantity
32. The date and exact time of submission of the order or decision to deal. The exact time must be measured according to the methodology prescribed in Commission Delegated Regulation (EU) 2017/574 of 7 June 2016 supplementing Directive 2014/65/EU of the European Parliament and of the Council with regard to regulatory technical standards for the level of accuracy of business clocks or in technical standards made by the Financial Conduct Authority under paragraph 26 of Schedule 3.
- 33.The date and exact time of any message that is transmitted to and received from the trading venue in relation to any events affecting an order. The exact time must be measured according to the methodology prescribed under the RTS on clock synchronisation.

34. The date and exact time any message that is transmitted to and received from another investment firm in relation to events affecting an order. The exact time must be measured according to the methodology prescribed in Commission Delegated Regulation (EU) 2017/574 of 7 June 2016 supplementing Directive 2014/65/EU of the European Parliament and of the Council with regard to regulatory technical standards for the level of accuracy of business clocks or in technical standards made by the Financial Conduct Authority under paragraph 26 of Schedule 3.

35. Any message that is transmitted to and received from the trading venue in relation to orders placed by the investment firm

36. Any other details and conditions that was submitted to and received from another investment firm in relation with the order

37. Each placed order's sequences in order to reflect the chronology of every event affecting it, including but not limited to modifications, cancellations and execution

38. Short selling flag

39. SSR exemption flag

40. Waiver flag