



Order Record Keeping

Version 2.0

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Amendments to the document Version 2.0

- DA records are no longer admitted to modify orders.
- Market and dates fields functionalities have been erased from RI records (page 9). Fields “Starting_Date”, “Ending_Date” and “TrdnVn” have not to be filled in anymore on DW and EW records (page 8).
- Registrations and deregistrations changes in RI records (page 8). ORK historical area management: Historical area and Historic ORK. Admitted and rejected records (page 6).
- Number of messages limit at the response files (page 15).
- SHCD files: Short codes sent to the historical area (page 22).

1. Introduction

EU Regulation No 600/2014 of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments, especially Article 25.2 stipulates that: “The operator of a trading venue shall keep at the disposal of the competent authority, for at least five years, the relevant data relating to all orders in financial instruments which are advertised through their systems....”

Commission Delegated Regulation (EU) 2017/580 of 24 June 2016 specifies that the data relating to each order that must be kept are as follows:

Field number	Description
Identification of the relevant parties	
1	Identification of the entity which submitted the order
2	Direct Electronic Access (DEA)
3	Client identification code
4	Investment decision within the firm
5	Execution within the firm
6	Non-executing broker
Trading and liquidity provision capacity	
7	Trading capacity
8	Liquidity provision activity
Date and time	
9	Date and time
Validity period and order restrictions	
10	Validity period
11	Order restrictions
12	Validity period and time
Priority and sequence number	
13	Priority time stamp
14	Priority size
15	Sequence number
Identification of the order	
16	Segment MIC code
17	Order book code
18	Financial instrument's ISIN
19	Date of receipt of original order
20	Order identification code
Events affecting the order	
21	New order, order modification, order cancellation, order rejections, partial or full execution
Type of order	
22	Order type
23	Order type classification
Prices	
24	Limit price

25	Additional limit price
26	Stop price
27	Pegged limit price
28	Transaction price
29	Price currency
30	Currency of leg 2
31	Price notation
Order instructions	
32	Buy-sell indicator
33	Order status
34	Quantity notation
35	Quantity currency
36	Initial quantity
37	Remaining quantity including hidden
38	Displayed quantity
39	Traded quantity
40	Minimum acceptable quantity
41	Minimum executable size
42	Minimum acceptable quantity, first execution only
43	Passive only indicator
44	Passive or aggressive indicator
45	Self-execution prevention
46	Strategy linked order identification
47	Routing strategy
48	Trading venue transaction identification code
Trading phases, indicative auction price and volume	
49	Trading phases
50	Indicative auction price
51	Indicative auction volume

Necessary data to complete Order Record Keeping (ORK), required by MiFID II, will be obtained from two different sources:

1. Data in the order: this information is contained within the order sent by the Market Member via the SAPI or the market terminal. Among other data, the short codes that identify the decisor and executor (within the Market Member) will be included.
2. Information to be provided by the Member: the market members shall submit to the BME system the information related to the investment decision within the firm and execution within the firm (LEI, National ID, AlgoID) which are linked to each short code included in every order.

BME will validate the information sent by the members in the order and in the different records to assure its consistency.

BME will communicate the status of each file as well as the validation status of these fields.

Fields included in the order

The following fields are included by the Member in the order:

Field number	Description
Identification of the relevant parties	
1	Identification of the entity which submitted the order
4	Investment decision within firm
5	Execution within firm
6	Non-executing broker
Liquidity provision capacity	
8	Liquidity provision activity
Identification of the order	
17	Order book code
Events affecting the order	
21	New order, order modification, order cancellation, order rejections, partial or full execution
Type of order	
22	Order type
Prices	
24	Limit price
25	Additional limit price
26	Stop price
Order instructions	
32	Buy-sell indicator
36	Initial quantity
38	Displayed quantity
40	Minimum acceptable quantity
41	Minimum executable size
45	Self-execution prevention
46	Strategy linked order identification

Short codes or use of identification codes

Fields 4 and 5 will be coded. They must be completed for SENAF market, otherwise the order will be rejected by the market, as per the technical specifications of the SAPI.

The aforementioned fields will be filled in using whole numbers between 100 and 4,294,967,295 ($2^{32}-1$) (both included). These numbers are identification codes representing unique keys linked to a database managed by BME.

SENAF's Market Members will fill in and modify the information linked to the orders (registered in the BME system) through two types of records:

1. DW record – Decision
2. EW record – Execution

These records are communicated to BME through the decision and execution codes to incorporate/modify the data associated to each one these codes. The following records shall be used for this purpose:

- DW record - decision
- EW record - execution

ORK historical Database Management

ORK historical data management consists in a database partition, with the aim to be more efficient and rationalize the data received from the market members and so, to improve daily and historical orders consolidation.

The ORK database is divided in two areas:

- **Working area:**
 - Current and previous month (T-1) orders, regardless their status (properly informed or not).
 - Orders from any period that are not properly informed yet.
- **Historic area:**
 - Orders sent to the market before to the first day of the previous month and that have been properly informed.

To achieve the above, each end of the month, the orders and short codes will be transferred to the Historic area of the ORK:

- **Orders:** those orders previous to the first day of the previous month that have been correctly informed will be moved to Historic ORK.
- **Short codes:** those short codes used at least once in an order sent to the Historic ORK, will be moved to the Historic ORK. This will be informed through SHCD files.

The examples below show the order's movement that would have been done on the 31st of July of 2019:

1. Order submitted after the first day of the previous month that is not properly informed

ORDER NUMBER	ORDER DATE	ALIVE	CORRECT	HISTORIC
100000001	25/06/2019	NO	NO	NO

The order 100000001 **will not be sent to the historical area** for both for being posterior to the first day of the previous month and for not being fully informed, **thus, it will remain in the working area.**

2. Order submitted before the first day of the previous month that is not properly informed

ORDER NUMBER	ORDER DATE	ALIVE	CORRECT	HISTORIC
100000002	10/05/2019	NO	NO	NO

Although the order 100000002 has been submitted before the first day of the previous month is not properly informed, therefore, **it will not be sent to the historical area, and so it will remain at the working area.**

3. Order submitted in the current month that has been correctly informed

ORDER NUMBER	ORDER DATE	ALIVE	CORRECT	HISTORIC
100000003	25/07/2019	NO	YES	NO

Although the order 100000003 is properly informed it will **not be sent to the historical area**, for it has been submitted after the first day of the previous month, **and so it will remain at the working area.**

4. Order submitted before the first date of the previous month that is correctly informed.

ORDER NUMBER	ORDER DATE	ALIVE	CORRECT	HISTORIC
100000004	17/03/2019	NO	YES	YES

As the order 100000004 is correctly informed and has been submitted before the first day of the previous month, **it will be sent to the historical area.**

2. Types of record

Changes in records DW and EW respect to the previous version

If the market members use short codes records (DW or EW) to report order data, there must be taken into account the new RI records functionality, which is a simplification compared to the previous version:

- **“Starting_date” and “Ending_date” fields’ functionalities have been discontinued** from RI records in order to increase simplicity in data sending and management. Anyhow, please **note that the file’s structure will remain the same** thus, those fields (“Starting_date” and “Ending_date”) shall remain uninformed (empty).

The discontinuation of Date functionality implies that data sent through DW or EW Records **will have perpetual validity**.

- **“TrdnVn” field** (market MIC code) **functionality has been discontinued**. Short codes data sent through DW or EW records will apply to all markets within BME (having the same effect as when the field was filled with “*” in the previous version). The structure of the records remains unchanged, so this field must be blank (any other value will not be used).
- The information may be deregistered as it is currently done for the records at the working area: by sending the corresponding DW or EW deregistration record. The deregistration implies erasing the information associated to the short code, leaving it empty.

For a deregistration request to be accepted, it has to be done over short codes (DW or EW) that have not been used in orders located in the Historic ORK. Requests for deregistration of RI records used in the Historic ORK will be rejected.

- Short codes moved to Historic ORK will be reported through SHCD files.
- **Elimination of unnecessary records:** every end of the month RI records (registered in the last two months) that have not been used in any order, will be deleted.

DW record- Investment decision within the firm

These records contain information of the order decision maker's identity when the decision has been taken within the firm. They will have the following structure:

No.	Field	Information	Description
1	TypeReg	RI	Type of identification code record.
2	Action	A-Registration/ Modification B-Deregistration	Indicates the function of the RI record submitted.
3	ExctgPty	Legal entity identifier	LEI of the entity that enters the order.
4			
5			
6			
7	Identifier		Short code of decision maker within the firm.
8	SubRegister	DW	Indicates that it is a DW record.
9	Dcsn_typePrsn	P-Person A-Algorithm	Type of decision maker
10	Dcsn_Algo	Algorithm code	If Dcsn_typePrsn='A'. Code of algorithm taking the transaction decision within the member.
11	Dcsn_Othr_SchNm	NIDN, CCPT, CONCAT	If Dcsn_typePrsn='P'. National ID code type. NIDN = National ID CCPT = Passport CONCAT = CONCAT code
12	Dcsn_Othr_Id	National_ID	If Dcsn_typePrsn='P'. National ID of the decision maker within the member.

The first time a RI-DW record is submitted, the DW codes will be registered since the beginning of ORK until the 31-12-9999 for all BME markets. This is the validity date set automatically by the system.

When a RI-DW record contains a DW short code that has been already registered but has different information, the information of the new RI-DW will replace (from that day onwards) the existing information.

If the information submitted in a RI-DW record has already been registered in the system for that DW short code (same short code with the same information), the new RI-DW will be rejected.

To modify the decision maker information of the orders associated to a DW short code, it will be necessary to send a RI-DW record with the field Action=B and, immediately after, a registration with the new information associated to the short code. This means a full deregistration of this short code, deleting decision maker information that has been associated to orders. Then, the new registration RI-DW will be associated to all orders from the 03/01/2018 until 31-12-9999 as the information will be treated like if it were first information submission for this short code (for the prior one has been deleted).

The deregistration of a RI-DW record whose short code has been moved to the historical database will be rejected.

EW record - Execution within the firm

These records contain information regarding the identity of the order executor within the market member.

It will have following structure:

No.	Field	Information	Description
1	TypeReg	RI	Type of identification code record.
2	Action	A- Registration/ Modification B- Deregistration	Indicates the function of the RI record submitted.
3	ExctgPty	Legal entity identifier	LEI of the entity that enters the order.
4			
5			
6			
7	Identifier		Short code of executor within the firm or reference of the client informed in the order.
8	SubRegister	EW	Indicates that it is an EW record.
9	Exct_typePrsn	P-Person A-Algorithm	Type of transaction executing entity within the member.
10	Exct_Algo	Algorithm code	If Dcsn_typePrsn='A'. Code of algorithm sending order to the market within the executing member.
11	Exct_Othr_Sc hNm	NIDN, CCPT, CONCAT	If Dcsn_typePrsn='P'. National ID code type NIDN = National ID CCPT = Passport number CONCAT = CONCAT code.
12	Exct_Othr_Id	National_ID	If Dcsn_typePrsn='P'. National ID of the person sending the order to the market within the executing member.

Submitting a RI-EW record for the first time implies registering the information associated to that short code for all the markets within BME from the beginning of the ORK (03-01-2018) until the 31-12-9999.

When a RI-EW record contains a EW short code that has already been registered but has different information, the information of the new RI-EW will replace (from that day onwards) the existing information.

If the information submitted in a RI-EW record has already been registered in the system for that short code, that is, same short code with the same information, the new RI-EW record will be rejected.

To modify the decision maker information of all the orders associated with a DW short code, it will be necessary to send a RI-DW record with the field Action=B and, subsequently, a registration with the new information associated to the short code. This means a full deregistration of this short code, deleting decision maker information that has been associated to orders. Then, the new registration RI-DW will be associated to all orders from the 03-01-2018 until 31-12-9999 as the information will be treated like if it were first information submission for this short code (for the prior one has been deleted).

The deregistration of a RI-EW record whose short code has been moved to the historical database will be rejected.

3. Validations

BME will perform the following checks to validate the consistency of the data submitted by the Market Members. The following identifiers are predefined and fixed by the system:

Field 2, Direct Electronic Access

- 0 – Always false.

Field 3, Client identification code

- 0 – The order has no client (on own account).

Field 7, Trading capacity

- Always Deal (on own account).

If fields 4, 5 and 8 are not submitted by the Market Member complying with the specifications below, the order will be rejected:

Field 4, Investment decision within the firm

- This field will be filled using whole numbers between 100 and 4,294,967,295 ($2^{32}-1$) (both included).

Field 5, Execution within the firm

- This field will be filled using whole numbers between 100 and 4,294,967,295 ($2^{32}-1$) (both included).

Field 8, Liquidity Provision Activity

- It will be either true (1 when using SAPI) or false (0 when using SAPI).

4. Timetable

Data feed from the Member to BME

The files with the necessary records to complete the orders information can be submitted to BME's SFTP server at any time.

Files submitted after the starting of the consolidation process will be considered as sent on the next day. Therefore, its information will be processed in next day's consolidation.

Data feed from BME to the Member

1. Inbound file Validation INB:

For every file (INB) submitted, the system will generate an OUT file. It will contain the validations and file status will be informed in a FI record as described in the Table 1 (page 21). This file will act as the reply the system gives once the INB file has been processed.

2. First ORVB file. Daily consolidation:

On a daily basis, starting at 23:30h, the consolidation process will start. A first ORVB file will be sent (through the SFTP server) containing the consolidation of the orders introduced in that same day (T day) and the orders introduced the previous one (T-1). The file will communicate the orders that have not been properly informed. I.e: an order that contained a short code that is not properly registered in BME's system.

3. Second ORVB file. Historical consolidation:

This file will only be generated if the firm has sent information related to orders that are out of the Daily consolidation timeframe. This is, orders sent to the market on D-2, D-3, etc.

The file will be generated once the process of the first ORVB file (with the daily consolidation) is completed. It will only be created if a Market Member submits a record that apply to orders sent to the market on T-2 or before (D-3, D-4, etc.).

The file will show the status of the orders affected by the records submitted, in case they have not been correctly informed.

5. Notifications

Technical aspects of inbound files

Files are coded in UTF8 format with a variable string length depending on the record type; fields are delimited using the character “;”.

Text fields (Char) will be delimited by double quotation marks. Within any field, double quotation mark is not allowed.

The following data types are specified hereon to determine the maximum values allowed:

Decimal	Numeric fields where the “.” character is used to separate decimals. For negative figures, the ‘-’ sign is included to the left of the first significant digit. The specified number of significant digits cannot be exceeded.
Date	Fields to specify dates and with the format YYYY-MM-DD.
Datetime	Used to specify dates and time, using the ISO 8601 format YYYY-MM-DDThh:mm:ss.ffffffZ.
Char	Text fields that must be completed with the specified number of characters. Spaces must be inserted to the right if there are fewer characters.
Varchar	Text fields that can be completed with required characters without exceeding the specified maximum.

Naming of the files sent by member

The name of the file containing the long code records that a member wants to submit will be as per below:

INB_LEI1_LEI2_TIPO_AAAAMMDD_SEQ.EXT_MD5

- INB (3) → INBOUND. Indicates an inbound file.
- LEI1 (20) → LEI of the member sending the file.
- LEI2 (20) → LEI of the member on behalf of which the file is being sent. Can be the same as LEI1 if there is no submitting entity.
- TYPE (4) → File type: **ORK**
- YYYYMMDD (8) → File communication date.
- SEQ (3) → Three-digit sequential number. Example: 001
- EXT (3) → Extension of the text files. MD5 33 → the file’s MD5 hash of 32 characters may be included after the extension to be able to validate that the file is the same at the source and destination.

This file will contain the various types of records defined in this document. Each, DAT file will be compressed on a .ZIP file which will have the exact same naming.

As a rule, any submission by a member will be accepted. Uploads are additive (except when there is a syntax error in the content of the file, in that case the entire file will be rejected). Batch file uploads are allowed.

Inbound files to the ORK will be processed in the order they are received, Members are responsible for uploading them in the correct order.

Each submission will have a system's reply, a file will be generated in a few minutes for each file uploaded to the ORK system. This reply will specify whether the file was satisfactorily processed or not.

The process of uploading INB files will perform the following validations before processing the information

- **Files with duplicated nomenclature:** when the name of two files is identical, then the system will not process the file submitted the latest. It will remain in the filesin folder of the SFTP, and it will be renamed adding the prefix "REP_" and that file will not be processed.
- **Files with the same content:** when the content of two files is identical, then the system will not process the file submitted the latest. It will remain in the filesin folder of the SFTP, and it will be renamed adding the prefix "MD5_" and that file will not be processed.

Naming and format of the files sent by the ORK to members

These files will act as a system's reply to any uploaded (and process by the system) file. The naming of the files sent from the ORK to the market members will be as per below:

OUT_LEI1_LEI2_TIPO_AAAAMMDD_SEQ.EXT_MD5

- OUT (3) → OUTBOUND. Indicates an outbound file.
- LEI1 (20) → LEI of the member sending the file.
- LEI2 (20) → LEI of the member on behalf of which the file is being sent. Can be the same as LEI1 if the members are one and the same.
- TYPE (4) → File type: **ORK, ORVB and SHCD**.
- YYYYMMDD (8) → File generation date.
- SEQ (3) → Three-digit sequential number. Example: 001
- EXT (3) → Extension of the file: **CSV**
- MD5 (33) → the file's MD5 hash of 32 characters may be included after the extension to be able to validate that the file is the same at the source and destination.

This file contains two types of records informing about:

1. Result of the validation of syntax and content of RI or RC records.
2. Result of the validations performed in the data consolidation process and the information to be provided by the Member.

Size limitation for ORK and ORV outbound files

Response files will show up to 10.000 messages. If due to the volume of errors this limit is surpassed, the last record will show the below message, meaning this limit has been overcome and there are messages not showed:

“There are errors that are not displayed. Number of messages has exceeded the limit”

FI records

This type of record contains information regarding the GLOBAL status of the file.

Its structure is as follows:

No.	Field	Information	Description
1	TypeReg	FI	Record type
2	Source		ORK: BME ORK system
3	CreDT		Date sent
4	ExctgPty	LEI	Market LEI
5	FileName		Name of INB file sent by the member
6	Sts		Status (Table 1)
7	TtINbOfRcrds		Total registers
8	stACTP		Number of accepted transactions
9	stPDNG		Number of pending transactions
10	TRSJCT		Number of rejected transactions
11	TRSCVD		Number of received transactions

Table 1:

StatusCode	Name	Definition
ACPT	Accepted	Report has been accepted
CRPT	Corrupted file	The file is corrupt
INCF	Incorrect filename	File name is incorrect
PART	Partially accepted	Report has been partially accepted. Some records have been accepted and others not
RJCT	Rejected	The entire report has been rejected
MISS	Missing Records	Report has been accepted, but there are missing records

VA records

This type of record contains information sent by BME to members regarding the status of the file: providing details of the errors detected.

The FI and VA records must be processed in order, as all the consecutive VA records are related with the immediately superior FI record.

Its structure is as follows:

No.	Field	Information	Description
1	TypeReg	VA	Record type
2			Empty
3	Origin		Answer information source
4	LineNum		Number of the line of the original file where the error is
5	Sts		Status (Table 1)
6	RuleId		Validation rule Id
7	FileNm		Name of the field in error
8	IdRTS		Related field with RTS 22 format
9	ErrCd		Error code
10	ErrMssg		Error message in text format
11	OrgnValue		Original value

Table of error codes:

CODE	DESCRIPTION
1055	DA record. Ending Date must be prior to D-1
2001	Orders with this short code has not its associated information for this date
2002	This order has code 5 in Client field, but its information has not been submitted in a RC record
2003	This order has code 5 in Decision field, but its information has not been submitted in a RC record
2004	This order has code 5 in Executor field, but its information has not been submitted in a RC record
2011	Order has no client, there has to be decision within the firm and capacity cannot be AOTC
2012	The order has a Client, capacity cannot be DEAL
2013	DEA order. There must be a Client, there is no Decision within the firm and capacity will have to be AOTC
2014	If Client executes the order, the holder cannot be the market member, there is not decision within firm and capacity has to be AOTC
2015	Client short code cannot be a number below 100
2016	Decision maker short code cannot be a number below 100
2017	Executor short code cannot be a number below 100
2101	The RC register does not match with any order available in the current Data Base
2102	RC record has additional data fields that cannot amend an order that is still in the market and must be amended through the GUI
2103	DA record cannot be associated to any order
2104	DA record has additional data fields that cannot amend an order that is still in the market and must be amended through the GUI
2105	RI record cannot be associated to any order
2107	RC record has found an order and has been consolidated correctly
2108	DA record has found orders and has been consolidated correctly
2109	RI record has found orders and has been consolidated correctly
ACPT	All orders information has been consolidated correctly
CON-048	The value should be a string of 20 characters where first 18 characters are capital letters or numbers and 2 last characters are numbers
CON-074	The format of the buyer identification code is incorrect

CON-077	If person national identifier is used, only one of the following values can be populated: 'NIDN', 'CCPT', 'CONCAT'
CON-078	If LEI is used, the value should be a string of 20 characters where first 18 characters are capital letters or numbers and 2 last characters are numbers. / If national identifier is used, the value should be a string of no more than 35 characters. / If MIC is used, the value should be a string of 4 characters (letters or numbers). / For internal, the 'INTC' code should be reported.
CON-164	The format of the seller code is incorrect
CON-168	If LEI is used, the value should be a string of 20 characters where first 18 characters are capital letters or numbers and 2 last characters are numbers. / If national identifier is used, the value should be a string of no more than 35 characters. / If MIC is used, the value should be a string of 4 characters (letters or numbers). / For internal, the 'INTC' code should be reported
CON-297	Only one of the following values can be populated: 'DEAL', 'MTCH', 'AOTC'
CON-368	The reported value should be a string of 4 characters (letters or numbers). /
CON-573	If person national identifier is used, the first 2 characters of the national identification code should be an ISO 3166 country code that was valid at the trading date
CON-574	The format of the executing person code is incorrect
CON-577	If person national identifier is used, only one of the following values can be populated: 'NIDN', 'CCPT', 'CONCAT'
CON-578	In case an algorithm identifier is used, the following characters are only allowed: capital Latin letters (A-Z), numbers (0-9)
CON-590	The national identification code does not include valid country code
CON-591	The format of the executing person code is incorrect
CON-597	If person national identifier is used, only one of the following values can be populated: 'NIDN', 'CCPT', 'CONCAT'
CON-598	In case an algorithm identifier is used, the following characters are only allowed: capital Latin letters (A-Z), numbers (0-9)
CON-807	Only 'B' or 'S' values allowed (Buy/Sell)
CON-857	Only one of the following values can be populated: 'LEI', 'MIC', 'P', 'INTC'
CON-867	Only one of the following values can be populated: 'LEI', 'P'
CON-897	Data should be one of the following: P=Person; A=Algorithm
CON-907	The format should be one of the following: P=Person; A=Algorithm
CON-917	Only 'A' or 'B' values allowed (A-Registration/B-Deregistration)
CON-927	Only one of the following values can be populated: 'LEI', 'P', 'PNAL', 'AGGR', 'N'
CON-937	Only one of the following values can be populated: 'ORD', 'QUO', 'BLO', 'RFQ', 'PLV', 'FON'
CON-950	Date time must be the same or before the system date time
CON-951	Trading date cannot be earlier than the agreed date of the first trading date to be reported under MiFIR or earlier than 5 years before the current date
CON-967	Only 'True' or 'False' values allowed
CON-977	Only 'True' or 'False' values allowed
CON-987	Only 'CT', 'DW' or 'EW' values allowed
CTR-046	Submitting / Executing LEI not allowed by BME. Please check registration
CTR-070	LEI XXX is not valid
CTR-071	If person national identifier is used, the first 2 characters of the national identification code should be an ISO 3166 country code that was valid at the trading date
CTR-160	If LEI is used, this field shall be populated with a LEI accurately formatted and in the LEI database included in the GLEIF database maintained by the Central Operating Unit. / 1. The status of the LEI shall be "Issued", "Lapsed", "Pending transfer" or "Pending archival". / 2. The InitialRegistrationDate of the LEI shall be equal or before the trading date. / 3. The EntityStatus shall be Active or if the EntityStatus is Inactive, the LastUpdateDate shall be equal or after the trading date.
CTR-161	If national identifier is used, the first 2 characters of the national identification code should be

	an ISO 3166 country code that was valid at the trading date
CTR-362	Not authorised MIC
CTR-701	Deregistration Action. No Registration record was found or it was rejected
CTR-761	Field should be a text string of no more than 10 characters
CTR-763	Short code. RI short code cannot be a number below 100
CTR-764	Field should not be greater than 4.294.967.295
CTR-765	Wrong client short code, please submit a RC record to provide client information
CTR-766	The RI register has been used in orders previous to the current Data Base
CTR-869	This client has already been submitted
CTR-900	Short code not allowed, it must be above 100
CTR-900	Short code not allowed, it must be above 100
CTR-911	Deregistration Action. No Registration record was found or it was rejected
CTR-955	Date must be a trading date
CTR-956	Initial date can not be after Final Date
DAR-001	The DA register has been used in orders previous to the current Data Base
DWR-765	Wrong decisión maker short code, please submit a RC record to provide decision maker information
DWR-766	The RI register has been used in orders previous to the current Data Base
DWR-909	This decisor has already been submitted
EWR-765	Wrong executor short code, please submit a RC record to provide executor information
EWR-766	The RI register has been used in orders previous to the current Data Base
EWR-899	This ejecutor has already been submitted
NOORDE RS	No order has been submitted to the market
STA-001	File containing the report has an incorrect filename.
STA-002	File containing the report is corrupted.
STA-004	Error Parser CSV. Check that limiters and the file is codified as UTF8
STA-005	Error in the de-encryption. Check you have used the BME public key.
STA-006	File containing the report has an incorrect filename. LEI of the member sending the file
STA-007	File containing the report has an incorrect filename. LEI of the member on behalf of which the file is being sent
STA-008	File containing the report has an incorrect filename. File type
STA-009	File containing the report has an incorrect filename. File communication date
STA-010	File containing the report has an incorrect filename. Sequence
STA-011	File containing the report has an incorrect filename. File extension DAT / XML
STA-012	File containing the report has an incorrect filename. File extension gpg
STA-013	File containing the report has an incorrect filename. MD5
STA-014	File containing the report has an incorrect filename. INBOUND
STA-015	File containing the report has an incorrect filename. Content zip file
STA-016	File containing the report has an incorrect filename. File extension zip
STA-045	ExctgPty LEI code cannot be different from filename ExctgPty LEI code
STA-971	Wrong register type
STA-990	Record type does not exist
STA-991	Number of fields in your register do not match with the requested.
STR-925	RC record with no information added

STX-040	ExctgPty. Field is mandatory
STX-042	Field should be a text string of no more than 20 characters
STX-070	Client identification. Field is mandatory
STX-072	If LEI is used, the value should be a string of 20 characters where first 18 characters are capital letters or numbers and 2 last characters are numbers. / If national identifier is used, the value should be a string of no more than 35 characters. / If MIC is used, the value should be a string of 4 characters (letters or numbers). / For internal, the 'INTC' code should be reported.
STX-073	Field should be a text string of no more than 6 character
STX-160	Client identification. Field is mandatory
STX-162	If LEI is used, the value should be a string of 20 characters where first 18 characters are capital letters or numbers and 2 last characters are numbers. / If national identifier is used, the value should be a string of no more than 35 characters. / If MIC is used, the value should be a string of 4 characters (letters or numbers). / For internal, the 'INTC' code should be reported.
STX-163	Field should be a text string of no more than 6 character
STX-292	Field should be a text string of no more than 4 characters
STX-360	MIC code. Field is mandatory
STX-362	Field should be a text string of no more than 4 characters
STX-572	If national identifier is used, the value should be a string of no more than 35 characters. / If algorithm identifier is used, the value should be a string of no more than 50 characters.
STX-573	If person national identifier is used, it should be restricted to a passport number (use of code CCPT in the SchmeNm/Cd tag), other national identifier as defined in RTS Annex 2 (use of code NIDN in the SchmeNm/Cd tag) or CONCAT (use of proprietary with value CONCAT in the SchmeNm/Prtry tag).
STX-592	If person national identifier is used, the value should be a string of no more than 35 characters. / If algorithm identifier is used, the value should be a string of no more than 50 characters.
STX-593	If national identifier is used, it should be restricted to a passport number (use of code CCPT in the SchmeNm/Cd tag), other national identifier as defined in RTS Annex 2 (use of code NIDN in the SchmeNm/Cd tag) or CONCAT (use of proprietary with value CONCAT in the SchmeNm/Prtry tag). /
STX-760	Shortcode. Field is mandatory.
STX-762	The reported value should be a string of 20 characters
STX-800	BuySell. Field is mandatory.
STX-802	Field should be a text string of no more than 1 characters
STX-850	Action. Field is mandatory.
STX-852	Field should be a text string of no more than 4 characters
STX-862	Field should be a text string of no more than 4 characters
STX-892	Field should be a text string of no more than 1 characters
STX-900	Decision maker type. Field is mandatory.
STX-902	Field should be a text string of no more than 1 characters
STX-922	Field should be a text string of no more than 1 characters
STX-930	Order type. Field is mandatory.
STX-932	Field should be a text string of no more than 3 character
STX-940	OrderID. Field is mandatory.
STX-942	Field should be a text string of no more than 12 character
STX-950	Date. Field is mandatory.

STX-952	Field must be populated with a valid date in the following format: YYYY-MM-DD
STX-962	Field should be a text string of no more than 1 character
STX-972	Field should be a text string of no more than 1 character
STX-980	Shortcode type. Field is mandatory.
STX-982	Field should be a text string of no more than 2 characters
STR-926	There are errors that are not displayed. Number of messages has exceeded the limit of 10.000

VB records

This type of records, which are generated after 23:30, contain information from BME to the Member relative to state in which the orders remain once the process of consolidation of information has been completed.

Its structure is as follows:

No	Field	Information	Description
1	TypeReg	VB	Record type.
2	Date	YYYY-MM-DD	Date of the order whose information is uncompleted. (only for RC)
3	Tipo_Err	RI,RC	Indicates if it is uncompleted because of: <ul style="list-style-type: none"> • RI: an identifier has been used for which no additional data has been provided. • RC: code 5 has been used in an order and no additional information has been provided in a RC record.VA: order has coherence error
4	Tipo_RI	CT, DW, EW	If type_Err='RI', it will inform of the type of identifier that is necessary to submit and has not been submitted.
5	Tipo_Ord	ORD, QUO, BLO, RFQ, PLV, FON	If type_Err='RC' it will inform about the type of order for which the necessary information has not been submitted.
6	BuySell	B-Buy S-Sell	If type_Err='RC' it will inform about the side of the order for which the necessary information has not been submitted. (Only if it is RC).
7	Id		Number of order if it is RC and short code of the record if it is RI.
8	ErrCd		Error Code.
9	ErrDscrptn		Description of the Error.

SHCD files

SHCD files will be generated at the beginning of each month and placed in filesout folder of the SFTP server.

This file will communicate short codes that have been moved to historical area.

Nº	Field	Data	Description
1	ExctgPty	LEI code	LEI code of the entity that sends the order
2	SubRegistro	CT/ DW/ EW	Indicates the type of short code that is shown: CT=Client DW=Decisor EW=Executor
3	Identifier		Short code that has been sent to the historical area
4	Date	YYYYMMdd	Date in which the movement to the historical area is made
5	Type	H/ D	Change in the short-code status: H: the short code has been moved to the historical area D: the short code has been erased due because it has not been used in the last two months.

6. Corrections

As per Commission Delegated Regulation (EU) 2017/580, members must report details of orders related with financial instruments before end of day of D+1.

In terms of ORK, updating of any field of an order implies a new record in its log and the consolidation of the new data contributed for successive entries. Both the original records and the notifications of changes will remain on the records.

Since ORK feeds on orders submitted into the exchange, as long as an order persists in the exchange all modifications must be done within the exchange. This modification will naturally flow to the ORK.

Corrections described on this section may be used once the order **is not on the market anymore**. Provided an order persists in the exchange, corrections made on the ORK will not have any effect on the order.

Also, when an order has gone to the Historic ORK, (see “ORK historical management” within the section 1) cannot be modified.

Fields that can be modified in a correction

Details of the ORK’s fields that can be modified are as follows:

ORK field number	Description
4	Investment decision within the firm
5	Execution within the firm
8	Liquidity provision activity

Course of action

There is no RC records on SENAF market, thus modifications are not available through this option.

To amend fields 4 and 5 on orders that are located on the Working area, the market member must send a RI record with the deregistration of the short code and then a new RI to register the code with the correct information.

In the event of seeking a modification on field 8, the market member should send an email to supervisionsenaf@grupobme.es and the Surveillance Department will manage the modification internally.

No modification will be allowed on orders that are in the Historical area.

7. Examples

Example 1. Corresponds to example 43 in the ESMA's Guidelines. Document with reference ESMA/2016/1452

A trader supervised by the head office of an American Firm, Firm F with LEI 549300ATRSCPTXGNEI40 with branches in Paris (FR), London (GB) and Frankfurt (DE) decides to buy a certain financial instrument. The transaction is executed by the operator in the market with MIC XMRV. The membership of Firm F is held by the branch in Frankfurt. The Firm is trading on own account.

The operator of Firm F inputs code 0 in the "client identification number" field of the order bulletin as the entity is trading on its own account. As a predefined code is used, there is no need to send an associated RI-CT record at zero.

It is assumed that the DW and ES short code identifiers are 120 and 125, respectively, for which an associated long code must be sent with the following format:

No.	Field	RI-DW RECORD
1	TypeReg	RI
2	Action	A
3	ExctgPty	549300ATRSCPTXGNEI40
4	Blank	
5	Blank	
6	Blank	
7	Identifier	120
8	SubRegister	DW
9	Dcsn_typePrsn	<i>P</i>
10	Dcsn_Algo	
11	Dcsn_Othr_SchNm	<i>CONCAT</i>
12	Dcsn_Othr_Id	<i>US19770912JON#DEWIT</i>

No.	Field	RI-EW RECORD
1	TypeReg	RI
2	Action	A
3	ExctgPty	549300ATRSCPTXGNEI40
4	Blank	
5	Blank	
6	Blank	
7	Identifier	125
8	SubRegister	EW
9	Exct_typePrsn	<i>P</i>
10	Exct_Algo	
11	Exct_Othr_SchNm	<i>CONCAT</i>
12	Exct_Othr_Id	<i>HU19800413ADAM#JONES</i>

**Data in grey have been assumed for the examples, they are not given in the heading.*

Example 2. Corresponds to example 82 in the ESMA's Guidelines. Document with reference ESMA/2016/1452

Investment Firm X (DEA client) with LEI 12345678901234500000 uses the membership code of Investment Firm Y (DEA provider) with LEI 549300P0EH641RMF7T94 in order to submit an order on Trading Venue M with MIC XMRV. The order of Investment Firm X consists in buying financial instruments on Trading Venue M. Investment Firm X is acting on behalf of Client 1 called Jean Cocteau, whose details are transmitted to Investment Firm Y pursuant to Article 4 of RTS 22. Algorithm 123456789 is responsible for the execution.

The operator of the Investment Firm enters the CT and EW short code identifiers only as the decision-maker was not within the Firm (DW). In this case, it is assumed that the identifiers are 122 and 159, respectively, for which an associated long code must be sent with the following format:

No.	Field	RI-CT RECORD
1	TypeReg	RI
2	Action	A
3	ExctgPty	549300P0EH641RMF7T94
4	Blank	
5	Blank	
6	Blank	
7	Identifier	122
8	SubRegister	CT
9	PType	P
10	LEI	
11	Prsn_SchmeNm	CONCAT
12	Prsn_Id	FR19620604JEAN#COCTE

No.	Field	RI-EW RECORD
1	TypeReg	RI
2	Action	A
3	ExctgPty	549300P0EH641RMF7T94
4	Blank	
5	Blank	
6	Blank	
7	Identifier	159
8	SubRegister	EW
9	Exct_typePrsn	A
10	Exct_Algo	123456789
11	Exct_Othr_SchNm	
12	Exct_Othr_Id	

**Data in grey have been assumed for the examples, they are not given in the heading.*

Example 3. Corresponds to example 65 in the ESMA's Guidelines. Document with reference ESMA/2016/1452

Trader 1 decides to buy a financial instrument for Client A under a discretionary mandate from Client A and Trader 2 places an order with Investment Firm Y to buy the instrument. Investment Firm Y, acting on a matched principal capacity, executes the order on Trading Venue M on 1 June 2018 at 14:51:09.123 at a price of EUR 32.50 using an algorithm with identifier ALGO12345.

The operator of Firm Y enters the CT, DW and ES short code identifiers in the order bulletin, which are assumed to be the identifiers 188, 114 and 127, respectively, for which an associated long code must be sent with the following format:

No.	Field	RI-CT RECORD
1	TypeReg	RI
2	Action	A
3	ExctgPty	5493007EY8MYC8PNZP26
4	Blank	
5	Blank	
6	Blank	
7	Identifier	188
8	SubRegister	CT
9	PType	LEI
10	LEI	123456123456123
11	Prsn_SchmeNm	
12	Prsn_Id	

No.	Field	RI-DW RECORD
1	TypeReg	RI
2	Action	A
3	ExctgPty	5493007EY8MYC8PNZP26
4	Blank	
5	Blank	
6	Blank	
7	Identifier	114
8	SubRegister	DW
9	Dcsn_typePrsn	P
10	Dcsn_Algo	
11	Dcsn_Othr_SchNm	CONCAT
12	Dcsn_Othr_Id	ES12345678TRADER#UNO

No.	Field	V-EW RECORD
1	TypeReg	RI
2	Action	A
3	ExctgPty	5493007EY8MYC8PNZP26
4	Blank	
5	Blank	

6	Blank	
7	Identifier	127
8	SubRegister	EW
9	Exct_typePrsn	A
10	Exct_Algo	ALGO12345
11	Exct_Othr_SchNm	
12	Exct_Othr_Id	

**Data in grey have been assumed for the examples, they are not given in the heading.*

Example 4. Aggregated order on equity informing of holder reference.

Firm E1 receives a request to sell 9000 securities of Client A with holder reference number 1234567890123456789 and 1000 securities of Client B with holder reference number ABCDEFGHIJKLMNOPQRST to close out its open positions in TELEFONICA stocks.

Firm E1 performs a transaction on its own account in market X MAD to sell 10,000 TELEFONICA stocks. The Firm uses various algorithms for making the transaction decision and sending it to the market.

The operator of Firm E1 enters the CT, DW and EW short code identifiers in the order bulletin. For the first, as it is an aggregated order, the field must be completed with the value 1 (value preassigned to aggregated orders AGGR). For the others, it is assumed that the identifiers are 222 and 333, respectively, for which an associated long code must be sent with the following format:

No.	Field	RI-DW RECORD
1	TypeReg	RI
2	Action	A
3	ExctgPty	549300470IY7S220K805
4	Blank	
5	Blank	
6	Blank	
7	Identifier	222
8	SubRegister	DW
9	Dcsn_typePrsn	A
10	Dcsn_Algo	1234ALGO
11	Dcsn_Othr_SchNm	
12	Dcsn_Othr_Id	

No.	Field	RI-EW RECORD
1	TypeReg	RI
2	Action	A
3	ExctgPty	549300470IY7S220K805
4	Blank	
5	Blank	

6	Blank	
7	Identifier	333
8	SubRegister	EW
9	Exct_typePrsn	A
10	Exct_Algo	456ALGO
11	Exct_Othr_SchNm	
12	Exct_Othr_Id	

**Data in grey have been assumed for the examples, they are not given in the heading.*

Example 5. Trade individually informed through RC record

The investment services entity X sends a buy order to the market XMAD of 1000 lots for Client A. Client A has conferred power of representation to the advisory entity E. The investment services entity X has sent the order to the market M through algorithm "1234 ALGO".

The order is introduced in the system using short code 5 in the fields "Client Identification", "Decision within the firm" and "Execution within the firm". The order is received on the market with OrderID 1237.

Subsequently, entity X submits the following RC record:

No	Field	RC RECORD
1	TypeReg	RC
2	Action	A
3	ExctPty	5493007EY8MYC8PNZP26
4	TrdnVn	XMAD
5	TipoOrden	ORD
6	OrderID	12377412
7	Fecha	2018-02-01
8	BuySell	B
9	PType	P
10	LEI	
11	Prsn_SchmeNm	NIDN
12	Prsn_Id	ES456789V
13	Dcsn_typePrsn	N
14	Dcsn_Algo	
14	Dcsn_Othr_SchNm	
16	Dcsn_Othr_Id	
17	Exct_typePrsn	A
18	Exct_Algo	ALGO12345
19	Exct_Othr_SchNm	
20	Exct_Othr_Id	
21	DEA	
22	TradCap	

23

LiqProvAct

ANNEX 1: Fields Format

RI record format. Identifier record

Nº	RTS 22	Field	Type	Long	Information
1		TypeReg	Char	2	RI
2		Action	Char	1	A-Registration/Modification B-Deregistration
3	4	ExctgPty	Char	20	Executing entity LEI
4		Blank	Char		
5		Blank	Date		
6		Blank	Date		
7		Id	Char	20	ClientID when the subregister is CTDcsnwFirm when the subregister is DW type (all) ExctwFirm when the subregister is EW type (all)
8		SubRegister	Char	2	Indicates type of record preceded by this header: CT, DW or EW

SubRegister CT of Clients Format

Nº	RTS 22	Field	Type	Long	Information
1		SubRegister	Char	2	CT
2		PType	Char	4	LEI, MIC, P, INTC. Buyer or seller ID type. INTC will be informed when the transaction is aggregated.
3	7,16	LEI	Char	20	If PType=LEI. Legal entity LEI code. If the identifier is an ordering party (as is the case with fund managers), the fund manager's LEI will be used.
4	7,16	Prsn_SchmeNm	Char	6	If PType=P. ID type for natural person. NIDN,CCPT,CONCAT
5	7,16	Prsn_Id	Char	35	If PType=P. Client identifier, DNI (national ID) for Spain.

SubRegister DW of decisor makers "within Firm" Format

Nº	RTS 22	Field	Type	Long	Information
1		SubRegister	Char	2	DW
2	57	Dcsn_typePrsn	Char	1	P-Person A-Algorithm
3	57	Dcsn_Algo	Char	50	If Dcsn_typePrsn='A'. Code of algorithm taking the transaction decision within the firm.
4	57	Dcsn_Othr_SchNm	Char	6	If Dcsn_typePrsn='P'. NATIONAL_ID code type. NIDN, CCPT, CONCAT
5	57	Dcsn_Othr_Id	Char	35	If Dcsn_typePrsn='P'. National_ID of the person sending the order to the Market within the executing member.

SubRegister EW of executors “within Firm” Format

Nº	RTS 22	Field	Type	Long	Information
1		SubRegister	Char	2	EW
2	59	Exct_typePrsn	Char	1	P-Person A-Algorithm C-Client
3	57	Exct_Algo	Char	50	If Exct_typePrsn='A'. Code of algorithm executing the transaction within the firm.
4	59	Exct_Othr_Sch Nm	Char	6	If Dcsn_typePrsn='P'. NATIONAL_ID code type.
6	59	Exct_Othr_Id	Char	35	If Dcsn_typePrsn='P'. National_ID of the person sending the order to the Market within the executing member.

RC record format

	Field	Type	Long	Description
Trade Data	1 TypeReg	Char	2	RC
	2 Action	Char	1	A- Registration/Modification B- Deregistration
	3 ExctPty	Char	20	Legal Entity Identifier
	4 TrdnVn	Char	4	MIC
	5 OrderType	Char	3	ORD – Simple Order QUO – Quote Order BLO – Agreed price trade RFQ – Request for quote PLV – Settlement value positions FON – Funds trading
	6 OrderID	Char	52	
	7 Date	Char	10	YYYY-MM-DD
	8 BuySell	Char	1	B-Buy S-Sell
Trade Holder	9 PType	Char	4	LEI, P, PNAL, AGGR, N
	10 LEI	Char	20	Legal entity identifier
	11 Prsn_SchmeNm	Char	6	NIDN, CONCAT
	12 Prsn_Id	Char	35	National_ID
Decision within firm	13 Dcsn_typePrsn	Char	1	P-Person A-Algorithm N-There is no decision within the firm
	14 Dcsn_Algo	Char	50	Algorithm code
	15 Dcsn_Othr_SchNm	Char	6	NIDN, CONCAT
	16 Dcsn_Othr_Id	Char	35	National_ID
Execution within firm	17 Exct_typePrsn	Char	1	P-Person A-Algorithm N-There is no execution within the firm
	18 Exct_Algo	Char	50	Algorithm code
	19 Exct_Othr_SchNm	Char	6	NIDN, CONCAT
	20 Exct_Othr_Id	Char	35	National_ID
Additional Data	21 DEA	Char	1	1,0 (True/False)
	22 TradCap	Char	4	DEAL, MTCH, AOTC
	23 LiqProvAct	Char	1	1,0 (True/False)