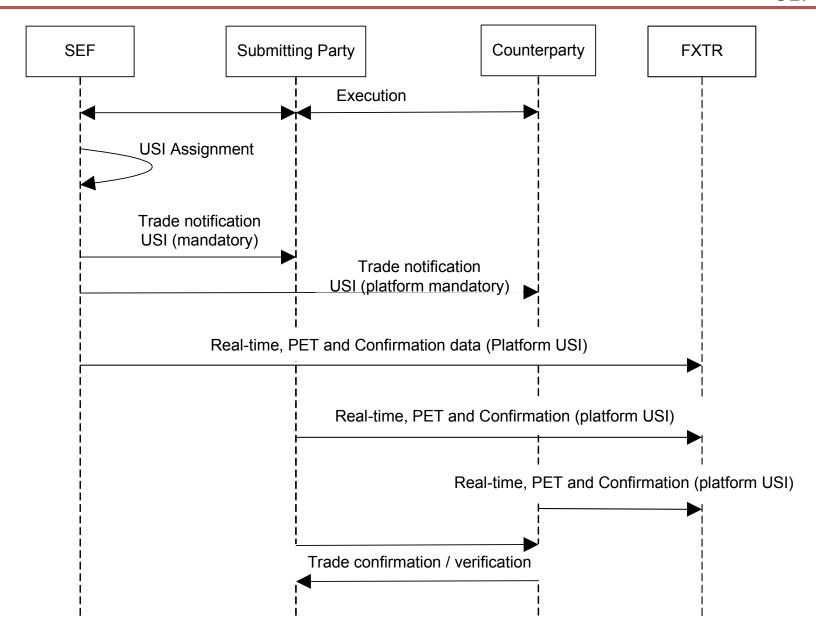
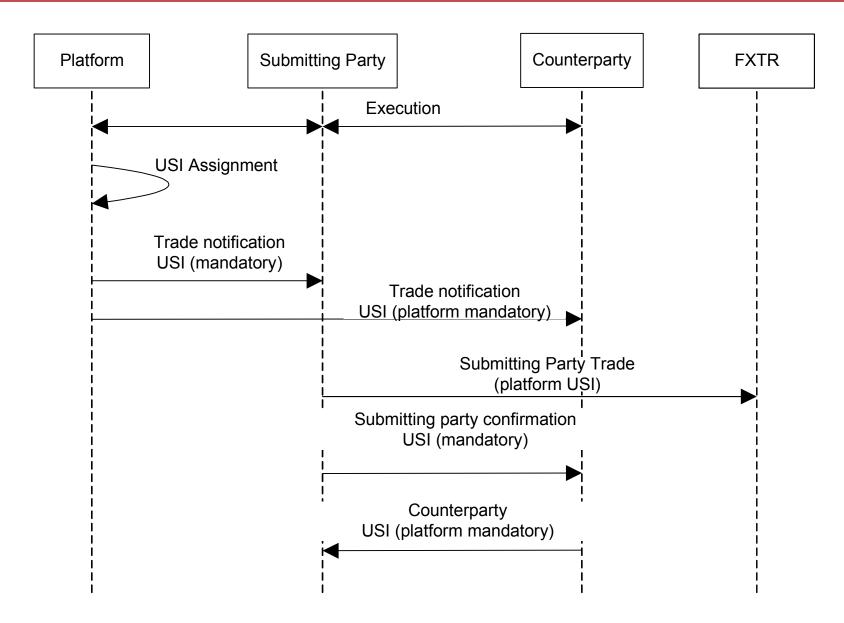
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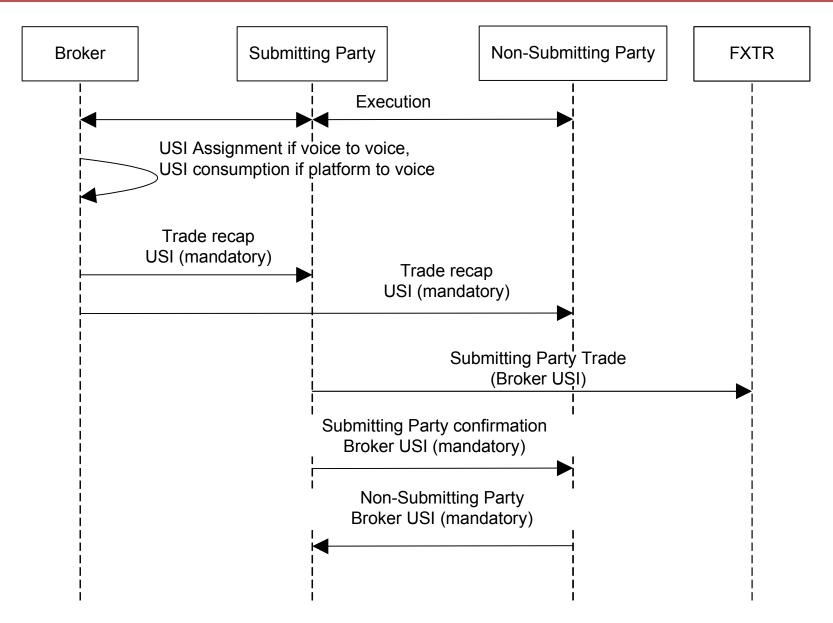
Global FX Division Market Architecture Group (MAG)

FX trade flows (ECN, SEF and Clearing Broker)

Majority of flow will remain on ECN and Single-Dealer Platforms
Question if ECN will adopt SEF-like functionality
If so, then should follow SEF workflow, if not, then should follow SDP flow
☐ Will SEF allow for dealers to act as 3 rd -party?
☐ Would dealers want the responsibility for SEF compliance?
Objective to make platform trades the same flow – SEF and ECN
Major question on SEFs will be whether we continue to confirm or verify trades or if
making SEF legal confirm means the existing confirmations process goes away

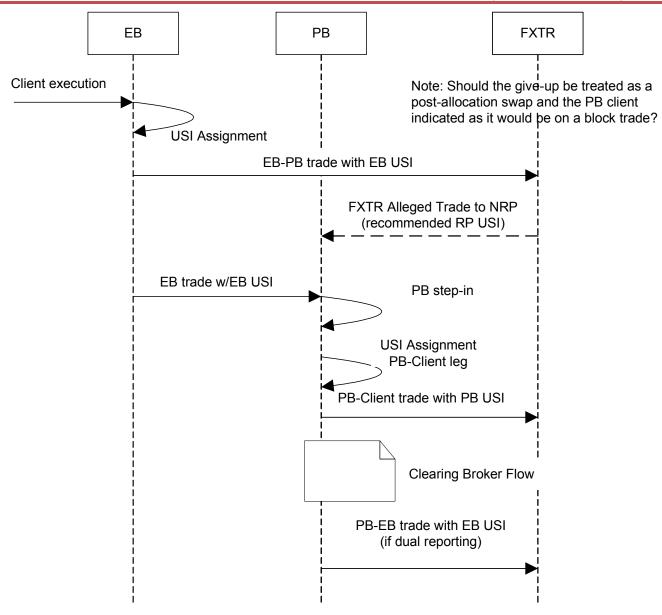




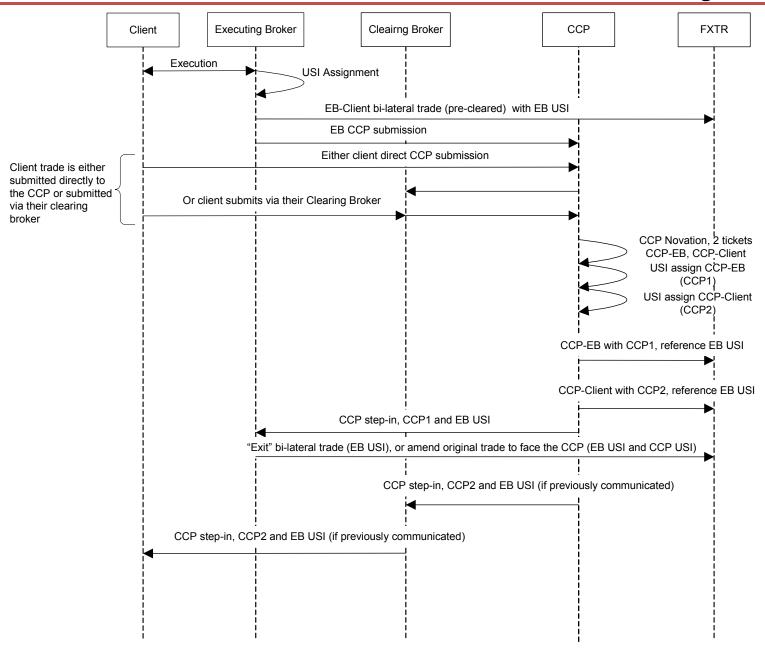


Prime Broker flow, the PB steps-in to the trade to credit intermediate
Clearing flow assumes agency FCM
Variability in agency flow comes from when CB is notified of trade and if the EB USI is
included – workflow allows for either.
Workflow does not include direct novation notification to client via CCP, but this may
convey CCP2 USI

Give-up and Principal Model Flows

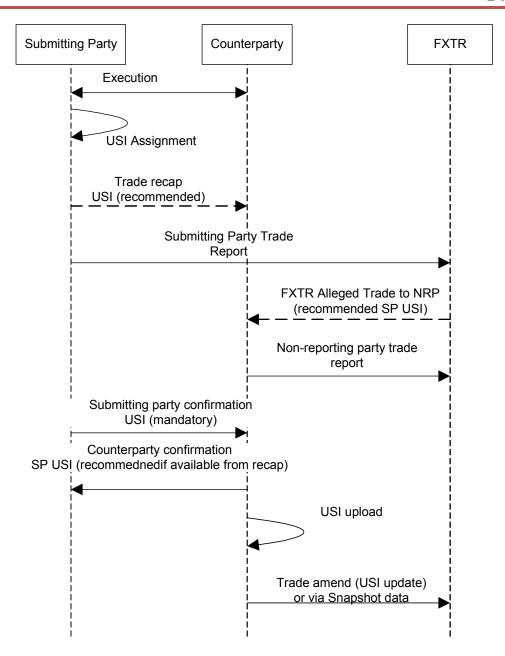


Clearing Broker Flow

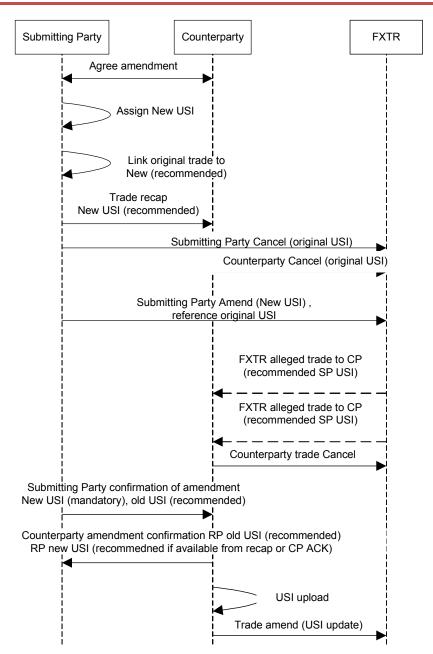


Language of model changed "submitting party" and "counterparty"
☐ Allows for discussion on USI using Dodd-Frank Rules and an International ID using
separate set of rules inbilateral flow
☐ If the case, parties would act in both role of submitting party and as counterparty
Amend – now support two use cases
Original case (cancel / new) documented as an exceptions case
☐ Single message "modify" does not cause a USI change and thus is not documented
For the case where the submitting party performs a cancel & new and their
counterparty has not, the counterparty will need to scrape the USI from the
confirm of the new and apply to their amendment record

Bi-lateral Execution



Trade Amendment (Exception Case)



Currently under review