# THE FRONT-TO-BACK SFTR SOLUTION

EQUILEND & TRAX®

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# THE COLLABORATION



EquiLend and TRAX, the post-trade services engine of MarketAxess, are collaborating on a full front-to-back Securities Financing Transactions Regulation (SFTR) solution to support the industry in meeting their reporting obligations.

EquiLend's expertise in the securities finance industry combined with TRAX's regulatory reporting and repo trade confirmation heritage result in a comprehensive service covering all SFTR eligible asset classes.

As leading providers of trading, confirmation and reporting solutions, EquiLend and TRAX are ideally placed to offer solutions around Unique Transaction Identifier (UTI) generation, timestamps and lifecycle events to help firms meet their reporting obligation.

The EquiLend and TRAX SFTR Solution allows firms subject to SFTR to obtain a pre-repository match to help ensure accurate reporting and efficient exception management processing.

The fully interoperable solution enables the onward routing of trades to the Insight engine, which (i) enriches the reports submitted by a client with reference data and (ii) sends the enriched transaction reports to certain trade repositories. The engine captures and centralises reporting flows, enabling firms to manage exceptions through a single interface and to rely on TRAX's rules engine to filter and enrich trades. Clients will also be able to benefit from delegated reporting.

### WHAT DOES SFTR ENTAIL?

The European Commission adopted the RTS and ITS on December 13, 2018. The report details a total of 155 reportable fields covering securities lending, repo, buy/sell-back and margin lending.



- Financial and non-financial counterparties
- European entities and their branches
- European branches of non-European entities



- Repurchase transactions
- Buy/sell-back
- Securities lending (security & commodity)
- Prime brokerage margin lending
- Collateral reuse



- Concluded on or after the relevant firms' golive date
- Concluded prior to go-live if:
  - the remaining maturity of those SFTs on that date exceeds 180 days; or
  - those SFTs have an open maturity and remain outstanding 180 days after that date;



- T+1 for transactions (conclusion, modification & termination)
- T+1 for collateral if known
- S+1 for collateral if not known at point of trade
- Record-keeping of five years following termination



- Up to 155 fields (varies per product and report type)
- ISO 20022 format
- Unique Transaction Identifier (UTI)
- Legal Entity Identifier (LEI)
- Principal-level entity data



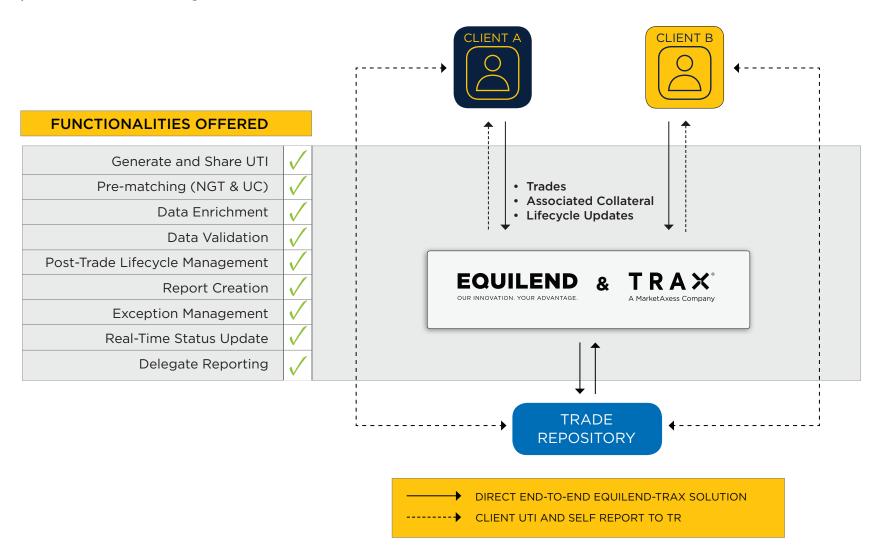
- 155 fields, 59 submittable and 96 reconcilable
- Reconcilable fields apply as follows
  - Phase 1 57
  - Phase 4 5 extra
  - Phase 1 + 24 mths 4 extra
  - Phase 4 + 24 mths 30 extra
- Inter- & intra-TR reconciliation
- Closed positions continue to be reconciled for up to one month

# **CHALLENGES & CONSIDERATIONS FOR MARKET PARTICIPANTS**

UNDERLYING PRINCIPALS AND THEIR RESPECTIVE LEIS	For the majority, counterparties are currently recognised by internal codes, and LEIs are not stored in front-end systems. Lenders are challenged with disclosure of their underlying principals (beneficial owners) and the associated timing of that disclosure. The Agency Lending Disclosure (ALD) process as it stands will not facilitate timely reporting. A subsequent challenge for the borrowers is housing the data received from lenders.
UTI GENERATION AND MANAGEMENT THROUGHOUT ALL LIFECYCLE EVENTS	Experiences under EMIR highlight the importance of a robust mechanism for generation and sharing of UTIs to support trade matching and reconciliation from initiation through to termination.
AGREED EXECUTION TIMESTAMP FOR ALL TRANSACTIONS	All new transactions will be required to have an execution timestamp. These can be generated at point of trade via NGT (EquiLend's multilateral trading facility). Any off-platform trades require additional attention to ensure agreement within the alloted one-hour tolerance window.
COLLATERAL ALLOCATION	Trades with known collateral are reportable on a T+1 basis. Where collateral is not known at point of trade, it is reportable on S+1. Agency structures with pooled clients collateralised with pooled collateral will need to be appropriately allocated and fully disclosed for onward reporting.
MANAGEMENT OF ALL LIFECYCLE EVENTS	Unlike MiFID, all lifecycle events that impact any of the reportable fields need to be reported through to termination.
VOLUME AND COMPLEXITY OF DATA	Market research, prepared by The Field Effect in its white paper "SFTR: Navigating the Challenge," has indicated firms may have difficulty sourcing up to 40% of the required reportable data. Governing agreements and versions is one of the many challenges. For some, these legal agreements are centrally stored, but for many this is not the case.
FRAGMENTED SYSTEMS AND COMPLEXITY OF DATA	For many, fragmented systems hold various elements of the required data set for reporting. Clients may be faced with the need to upgrade their current infrastructures to support reporting obligations.
ELIGIBILITY CRITERIA (SFTR OR MIFID ELIGIBLE)	Clients will need the ability to identify and capture all in-scope reportable transactions, recognising if they are reportable under SFTR (or MiFID).
PHASED IMPLEMENTATION	Reporting requirements are phased in according to the type of firm. Investment firms and credit institutions go live on day one. Non-financial counterparts (NFCs) go live nine months later. Although NFCs are not required to report for the first nine months, they will still be required to provide beneficiary information and LEIs to their counterparts. UTIs will still need to be generated but are still reportable by just the in-scope party.

# **CLIENT REQUIREMENTS**

Clients need to report to a chosen trade repository by T+1 both sides of a trade, any associated collateral, plus modifications throughout the lifecycle using our common UTI. They must also manage any exceptions in the reporting flow. Additionally, clients must deal with any reconciliation discrepancies flagged by the trade repository. The EquiLend and Trax SFTR Solution enables firms to meet regulatory requirements by using regulated trading, post-trade and reporting platforms to do the following:



# EQUILEND & TRAX SFTR SOLUTION SUBSCRIPTION: WHAT ARE THE OPTIONS?

## **OPTION 1**

- UTI Generation
- Instrument and Counterparty Enrichment
- Trax and Trade Repository SFTR Validations
- Reporting Firm Control and Oversight Dashboard
- Trade Repository Connectivity
- SFTR Field Matching Equity and Fixed Income & Collateral Allocations
- Lifecycle Management

# **OPTION 2**

- Inclusive of all Option 1 Services
- SFTR & MiFID Eligibility
- Delegated Report Generation
- Delegated Reporting Dashboards (25 Included)
- UTI Portal

### **EQUILEND & TRAX SFTR SOLUTION - KEY BENEFITS**

#### SINGLE REGULATORY REPORTING HUB

- TRAX offers a single hub across SFTR, MiFID II and EMIR
- TRAX will capture reporting from multiple points: EquiLend's platform, TRAX Repo or Direct Insight connectivity
- Comprehensive control and oversight dashboards available to reporting firms and their underlying clients
- · Centralised eligibility, validation and reporting
- Enrichment of counterparty and security reference data

#### LIFECYCLE EVENT MATCHING

- · Bilateral SBL and repo matching across sell-side and buy-side through TRAX Repo and EquiLend's Unified Comparison
- Fully automated, real-time lifecycle event processing via TRAX Repo and EquiLend's Post-Trade Suite (PTS). Facilitates capture of mandated intra-day activities
- Ability to process and match
  - MTM
  - Returns
  - Rerates
  - · Reallocations/substitutions

#### MINIMISE THE OPERATIONAL COST OF DELEGATED REPORTING

- Delegated reporting clients have full view of their reporting through the TRAX Insight GUI
- Delegated reports generated automatically by TRAX

#### INTEROPERABILITY

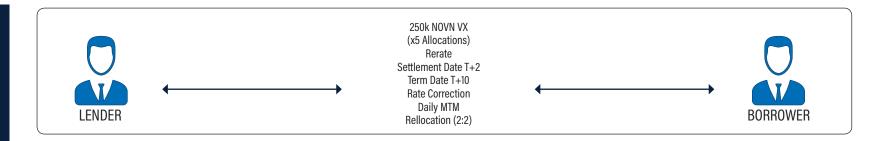
- All NGT trades will feed directly into EquiLend PTS for enrichment and comparison
- Ability to absorb and reconcile additional data from any third-party provider
- Real-time connectivity between EquiLend and TRAX covering all product types

#### POINT-OF-TRADE MATCHING

- Principal allocation trade details for SBL and repos matched and shared at point of trade from NGT
- Shared fields include UTI, LEI and execution timestamp (as opposed to confirmation), generated across the market-leading securities finance trading platform

# SAMPLE SECURITIES LENDING REPORTING SCENARIO

Simple transaction agreed



Generates significant reporting burden (in this example, 101 reports) REQUIRED TR REPORTS
LIFECYCLE EVENTS

		NEW	CORRECTION	COLLATERAL UPDATE	Valuation UPDATE	MODIFICATION	TERMINATION
TRADE EXECUTION	x5 UTI generations	5					
RATE CORRECTION	x5 UTI rate amends		5				
COLLATERALIZATION T+3 TO T+11	x5 UTI associated collateral reports across 9 business days			47			
DAILY MTM (T+3 TO T+9)	5x UTI MTM across 7 business days				35		
REALLOCATION (2:2)	x2 UTI closure and x2 reopens	2					2
RERATE	x5 UTI trade rerates					5	
					101		

EquiLend and Trax provide an automated process to generate a low-touch, STP reporting solution

# **EQUILEND**

### ND

# **EQUILEND & TRAX**

# TRAX

### NGT Trades and Bilateral Trades

- Trade executed over NGT and bilaterally
- Matched data-UTI, LEI, timestamp

# EquiLend Unified Comparison & TRAX Repo

- EquiLend inferred fields
- Life cycle processing and matching
- Repo trades confirmed in near real-time
- Ability to match both trade economics and SSIs

Trax Insight

- EligibilityEnrichment
- ISO 20022 format
- Delivery to TR

### Trade Repository

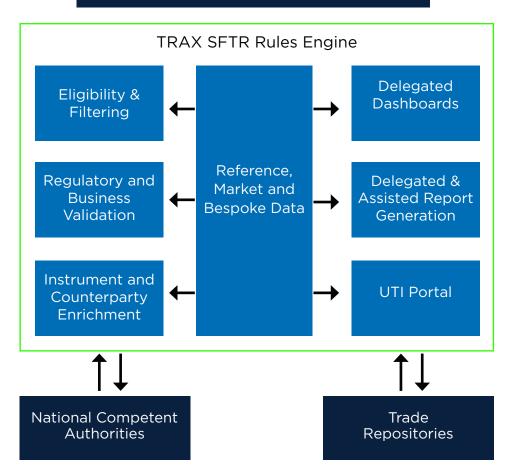
- Response generation
- Reconciliation reporting

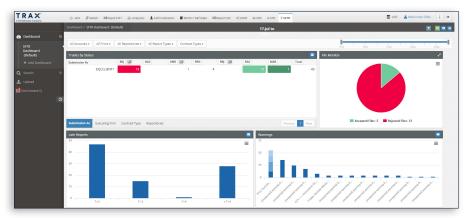
## **FULL TRANSACTION REPORTING TRANSPARENCY**

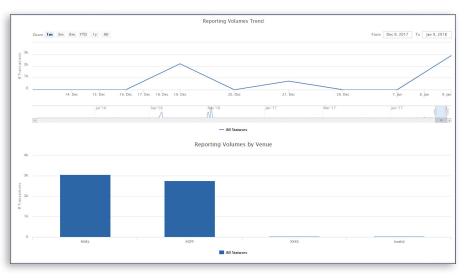
The EquiLend & Trax SFTR Solution offers one of the most advanced and comprehensive suites of matching, transparency and regulatory reporting solutions. Developed in conjunction with our community of clients, Trax's industry-leading and flexible technology adapts to each firm's needs to ensure trades are matched, enriched with relevant data, validated for reporting eligibility and reported in near real-time.

Within the EquiLend & Trax SFTR Solution, the TRAX Insight screen features a customizable, Web-based operational tool to actively manage and monitor the status of reporting and matching activity through a single interface. Clients can quickly identify exceptions and data quality issues as well as view industry-leading analytics and peer benchmarking.

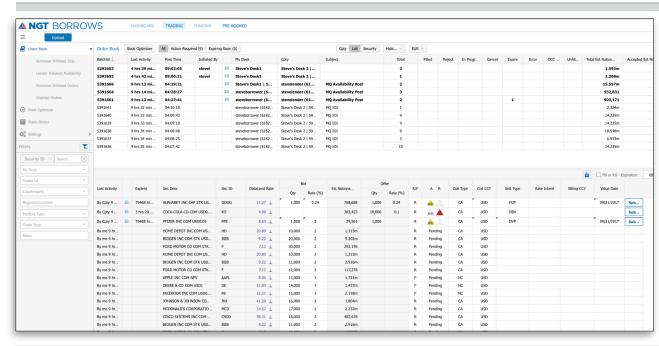
Reporting Firm/EquiLend/Trax Matching Services



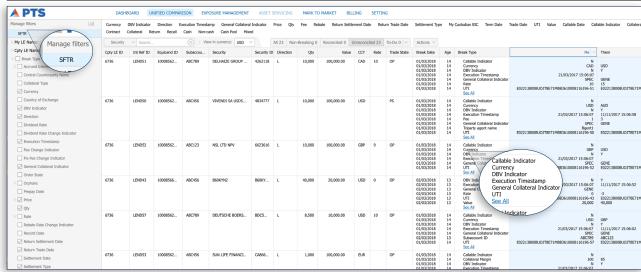




# **EQUILEND TRADING & POST-TRADE SERVICES**



Next Generation Trading (NGT) is a consolidated, multi-asset class trading platform for the securities finance marketplace. NGT increases trade-level transparency, improves workflow automation and generates greater efficiencies for the market.



Unified Comparison is the gateway into all posttrade lifecycle management services within EquiLend. Clients can perform pre-settlement affirmation, match and reconcile open contracts and amalgamate disparate data from third-party providers in Unified Comparison.

By connecting to Unified Comparison, clients reduce downstream lifecycle noise and are well positioned to adhere to regulatory initiatives.

Note: SFTR-required fields (e.g., UTI, execution timestamp) are now available in Unified Comparison.

# **ABOUT US**

# **EQUILEND**

#### OUR INNOVATION. YOUR ADVANTAGE.

EquiLend is a leading provider of trading and post-trade services for the securities finance industry with offices in New York, Boston, Toronto, London, Dublin, Hong Kong and Tokyo. EquiLend is owned by Bank of America Merrill Lynch, BlackRock, Credit Suisse, Goldman Sachs, JP Morgan, National Bank of Canada, Morgan Stanley, Northern Trust, State Street and UBS.

Used by securities borrowers and lenders globally, the EquiLend platform (for equities) and BondLend platform (for fixed income) automate formerly manual trading and post-trade processes in the securities finance industry. DataLend provides performance reporting and aggregated, anonymized, cleansed and standardized securities finance data covering all asset classes, regions and markets globally. EquiLend Clearing Services operates the ECS Middle Office and the ECS Gateway, which offer CCP services and connectivity, www.equilend.com

# TRAX®

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Trax, the post-trade services engine of MarketAxess, is a leading provider of trade matching and regulatory reporting services and is a trusted source of comprehensive and unbiased pricing and liquidity information to the global securities market. Trax processes on average over 1 billion cross-asset class transactions annually on behalf of its community of over 600 entities including approximately 12 million fixed income transactions. Trax operates an Approved Publication Arrangement (APA) and Approved Reporting Mechanism (ARM) for MiFID II trade and transaction reporting in addition to providing support for other regulatory regimes.

Trax is based in London and was originally established in 1985. Acquired by MarketAxess in 2013, Trax is a trading name of Xtrakter Ltd. and is a wholly owned subsidiary of MarketAxess Holdings, Inc. For more information, please visit www.traxmarkets.com.

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