CCIL POLICY
FOR REPORTING OF TRADES
BY
ELECTRONIC TRADING PLATFORMS (ETPs) /
THIRD PARTY SYSTEM (TPS)
Definitions

a. “CCIL-TR” shall have the meaning as provided under the CCIL Trade Repository Services Rules for OTC Derivatives
b. “CCP Services” shall mean the clearing and settlement services as may be provided by CCIL under the Payment Systems operated by it.
c. “Third Party System (TPS)” shall mean any permitted system or operator under applicable law.
d. “Electronic Trading Platform (ETP)” means any electronic system, other than a recognised stock exchange, on which transactions in eligible instruments as defined under “The Electronic Trading Platform (Reserve Bank) Directions, are contracted.
e. “ETP Operator” means the person authorised by the Reserve Bank to operate an ETP.
f. “Eligible Instruments” shall mean securities, money market instruments, foreign exchange instruments, derivatives, or other instruments of like nature, as may be specified by the Reserve Bank from time to time under section 45 W of Chapter III-D of the Reserve Bank of India Act, 1934.

Capitalized terms used herein shall have the same meanings as assigned to them under the Payment and Settlement Systems Act, 2007, The Reserve Bank of India Act, 1934, CCIL Bye-Laws, Rules and Regulations and CCIL-TR Rules as the context provides, and as amended from time to time.

Scope of Policy

This policy applies to any services availed by a CCIL Member from any third party i.e. an ETP/TPS for the purpose of reporting their Trades to the Payment Systems operated by CCIL for clearing and settlement of Trades.

It also applies to cover the protocols and requirements that CCIL-TR may provide to an ETP/TPS to enable the reporting framework.

Policy Objectives

The objective of the policy is to outline the framework for providing the following services:

A. CCP Services Reporting by ETP/TPS: Reporting by an ETP/TPS under a Straight Through Process (STP) for clearing and settlement of trades under the Payment Systems operated by CCIL.

B. Multi- Purpose Reporting: Reporting to CCIL through an STP from an ETP/TPS. Such reporting may be to meet the purpose of:
Reporting of Interbank Transactions by ETP/TPS

i. Statutory Reporting to CCIL-TR through ETP/TPS and/or

ii. Reporting for the purpose clearing and settlement under the Payment Systems operated by CCIL.

iii. or a combination of the services referred under ‘i’ and ‘ii’

Note: The reporting specified in ‘A’ above shall be referred as “CCP Service Reporting” and the reporting in ‘B’ above shall be referred as “Multi- Purpose Reporting”.
A. **Direct Reporting by ETP/TPS to avail CCP Services**

1. Members of CCIL availing CCP services and desirous of permitting their respective ETP/TPS to submit their Proprietary Trades/Constituent Trades may submit an application to CCIL for enabling the ETP/TPS to report the trades through an STP mechanism.

2. It shall be the responsibility of the Members to conduct due diligence on the ETPs/TPS.

3. Such reporting by an ETP/TPS shall be enabled through: File Routing System (FRS) utility or Application Programme Interface (API) or such other mode as agreed mutually between the ETP and CCIL (specified under Annexure A).

4. Any trade reported by an ETP/TPS shall be processed in accordance with the Bye-Laws Rules and Regulations (BRR) of CCIL. In other words, the reporting of trades by the Member via a STP from an ETP/TPS does not preclude the requirement of adherence to CCIL’s BRR.

5. Members availing the services referred in this part shall be solely responsible for the genuineness, accuracy and timelines for such reporting.

6. Any failure on part of the ETP/TPS shall be the sole responsibility of the Members of CCIL.

7. Members shall provide a prior intimation and consent while availing the service of an ETP/TPS for direct reporting through an ETP/TPS.

8. Members shall solely be responsible for the margins, settlement and shortage of such trades received for itself and / or for its Constituents.

9. Pre-settlement disputes arising prior to being accepted by CCIL shall be the responsibility of the ETP/TPS.

10. The format for the reporting of trades and any other specification shall be as specified by CCIL from time to time. Such specification may be specific in case of CCP Service Reporting and Multi-Purpose Reporting.

11. Any ETP/TPS shall adhere to the technical specifications, information technology infrastructure and such requirements necessary to establish a seamless STP with CCIL. The same is specified under Annexure A of this Policy.

12. The data to be supplied by ETP/TPS for CCP Service Reporting/ Multi-Purpose Reporting to CCIL will be the same as required to be reported by a Members of CCIL generally.
13. CCIL will maintain the source from where the information has been received i.e. from the Member or the ETP.

14. All reports and communication flow in terms of trade status etc. will continue to be directly shared by CCIL with its Members. Members shall be solely responsible for the reporting by ETP/TPS including any errors or any other form of disagreement.

15. The trades from ETP/TPS shall be in a file format provided by CCIL. Such trades shall be received by CCIL subject to its technical and business validations. The trades failing such validations shall be rejected by CCIL. ETP/TPS shall maintain log of the trades reported to CCP including the date and the timestamp of reporting. In the event of any technical rejection/failure of the message, the relevant information will be provided to the ETP over API/FRS.

16. In the event, any modifications carried out to the reporting formats or any validations are built at CCIL, the same shall be replicated by the ETP as well, to ensure smooth flow of data from ETP. Such modifications and validations, if any, shall be communicated to the ETP/TPS well in advance.

17. For Tri-Party Repo under Securities Segment, Forex Settlement Segment and Forex Forward Segment and the Rupee Derivatives (Guaranteed Settlement) Segment Regulations, the requirements as specified under Annexure B shall apply.
B. Specific Requirements for Reporting of Trades to CCIL-TR

Multi- Purpose Reporting by ETP/TPS

1. Entities that are CCIL TR Members desirous of reporting their trades concluded on ETPs / TPS may avail the services and authorize the ETPs/TPS for such services as specified under Part B of the Policy Objective. Such reporting is only treated as an ease of service, and the onus of reporting (including the accuracy and timelines) as per applicable law or direction shall always be that of the Members themselves.

2. A Member availing such service from an ETP/ TPS shall provide prior intimation to CCIL, such that the necessary reporting linkages are enabled between CCIL- TR and the ETP/TPS.

3. An ETP/TPS providing a direct reporting facility to CCIL- TR shall adhere to such pre-conditions, terms including any formats, information technology requirements and/or protocols as may be prescribed by CCIL- TR from time to time.

4. CCIL- TR may provide a reporting infrastructure/facility to report trades through a Straight Through Process (STP) via File Routing System (FRS) utility or Application Program Interface (API) facility or such other mode as agreed mutually between the ETP and CCIL. ETPs/TPS shall report the trades (NEWT) on behalf of a TR Member to CCIL-TR.

5. On such reporting, CCIL-TR will perform the technical validation over FRS/API. In the event of any technical rejection/failure of the message, the relevant information will be provided to the ETP over API/ FRS.

6. ETP shall monitor such deal rejection messages and report the trade message in correct format (prescribed format) to CCIL-TR. A reporting shall be complete/accepted by CCIL only where an acknowledgement/ confirmation message from CCIL- TR either through the API or FRS is received by and ETP/TPS. The trades as reported by an ETP/TPS, on successful acceptance, will be available to CCIL TR- Member over CCIL Online Reporting Engine (CORE) and/or on the CCIL reports section (under CCIL Report Browser tab) for verification.

7. The deal (message) may be in the following formats/ specifications:

4a) Reject status (owing to failure of business validation),

4b) Unmatched status (either owing to mismatch or non-receipt of counter deal from Counterparty),
4c) Matched/Trade For Processing(TFPR) status (in case both the parties to the trade are not our Guarantee Segment Members),

4d) Pending Exposure (in the event either or both the parties of GS member do not have adequate margin with CCIL)

4e) Passed Exposure status (in the event both the members are GS members and CCIL Risk system have Cleared the trade).

8. Any reporting to CCIL-TR shall be received at deal level i.e. from the perspective of individual party to the trade. Either one or both members to the trade could opt for the ETP to report the trade on their behalf.

9. Where a Member/party has not opted for the ETP to report trade on its behalf, the Member shall continue to report the trade in the normal course to CCIL-TR.

10. The eligible trades reported by the ETP/TPS on behalf of Members to the CCIL TR shall be accepted by CCIL for clearing and settlement as per CCIL’s Bye Laws, Rules and Regulations and the Members availing this service shall deemed to have consented to such flow of trades for clearing and settlement.

11. It shall be the member’s responsibility to ensure that the data is reported in a timely and accurate manner, including where the ETP/TPS is unable to report the data to CCIL-TR in case of a system failure etc.

12. While, the process flow would continue as usual, the exact mode of exchange of information and technical specification shall be formulated in consultations with the respective ETP/TPS.

13. The information required from the ETP would be the same as required to be reported by a Members.

14. Additionally, CCIL-TR will maintain the source from where the information has been received i.e. from the member or the ETP.

15. In the event, any modifications carried out to the reporting formats or any validations are built at CCIL-TR, the same shall be replicated by the ETP as well, to ensure smooth flow of data from ETP. Such modifications and validations, if any, shall be communicated to the ETP/TPS well in advance.

16. All reports and communication flow in terms of trade status etc. will continue to be directly shared by CCIL -TR with its Members. Since the information is shared with the Members on a near real time basis, if the member is not in agreement with the reporting by the ETP/TPS, the Member shall submit an amendment or cancellation as the case may be. For all matched trades, the amendment or cancellation shall have to be reported by both parties to the trade.

Diagrammatically the same is as explained below:
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Reporting of Interbank Transactions by ETP/TPS

- Trade takes place between 2 members of CCIL on the ETP

- The ETP sends data on behalf of the member(s) to CCIL in the CCL format.

- The deal is subjected to technical validations at CCIL
  - Post clearance of the technical validation checks, the deal is subjected to business level validations

- The deals are then taken up for matching.
  - For trades reporting to TR, trade status is notified to the members through the CORE Platform and/or Report Browser as is currently done to the members directly.

- If the members are not in agreement with the details reported by the ETP, then members will have to report an amendment or cancellation as the case maybe.
**Technical flow diagram for ETP reporting**

ETP would have to consume the public URL provided by CCIL.

As part of the URL, ETP would make a call to login API, which would return a token back on successful authentication. Then ETP would send that token as part of the http header and would make the call to CCIL deal reporting API.

CCIL would perform technical validation and on success of those, the data would flow to Trade repository for functional validation. The result/status of the functional validation would be available to members via the CORE reporting platform and/or CCIL Report Browser.

An audit of the request and response received/sent from/to the ETP systems would be maintained at CCIL.

A detailed API specification shall be provided on request.
Reporting of Interbank Transactions by ETP/TPS
ANNEXURE B

- Trades in government securities: Secondary market outright, repo and tri party repo, USD INR Forex forward and Forex and the Rupee Derivatives MIBOR OIS and MIFOR may be accepted by CCIL for settlement in terms of its BRR.
- Such trades shall be accepted in a pre-approved file format provided by CCIL.
- The trades shall be accepted only on fulfilling the technical and business validations of CCIL and subject to availability of sufficient margin with CCIL for Member and its Constituents respectively.
- CCIL's decision on the above should be final and binding.
- In case of non-availability of sufficient margin with CCIL the concerned Member will be advised by CCIL to bring sufficient margins for itself / its Constituent(s).
- In case of Member’ failure to bring the required Margin within stipulated time CCIL may reject the trades under advice to its Member. CCIL shall not be responsible for such rejected trades to the concerned ETP / TPS and the Members.
- Any trade received for other than CCIL Member and /or its Constituent registered with CCIL shall be rejected by CCIL.
- The Members shall be responsible for margins for such trades and its settlement.
- Any regulatory lapses on account of any delay/non reporting by ETP would be that of the Member.
- All the communications regarding the trades shall be with CCIL Members.