



# ASX BBSW Trade and Trade Reporting Guidelines

**Version 2.2**

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## 1. Introduction

### 1.1. Purpose

ASX Benchmarks is the benchmark Administrator for the Bank Bill Swap Rate (BBSW). The BBSW rates are calculated based on Eligible Trades during the Rate Set Window, with a volume weighted average price (VWAP) and Weighted Least Squares Regression (WLSR) calculation methodology adopted as the primary methodology for that calculation. In the event that BBSW cannot be formed under the VWAP or weighted LSR Methodology (as applicable) for a tenor(s), the NBBO Methodology will be used to determine the rate for an unformed tenor. In the event that a rate cannot be formed under the NBBO Methodology for one or more tenors, the stages in the Fall-Back Methodology will be triggered.

For the primary WLSR/VWAP layer, the calculation relies on Market Participants trading at outright yields within the Rate Set Window to establish the volume necessary for the Primary Calculation Methodology. All parties should therefore endeavour, to the best of their ability, to transact during the Rate Set Window.

This document represents ASX Benchmark's guidelines as Administrator outlining the obligations of Market Participants in connection with its generation and administration of the BBSW for the purpose of the ASIC Financial Benchmark (Administration) Rules.

The primary purpose of this document is to:

- ensure that a trusted, reliable and robust benchmark can be formulated based on Eligible Trades that reflect genuine business purposes, and to ensure that bids and offers for, and any transactions in Bank Paper, are not entered or undertaken for a purpose of seeking to influence the level at which BBSW is set or maintained;
- provide guidance for Eligible Trades, including having regard to regulatory issues that may be relevant to determining best practices and expected trading behaviour. These regulatory issues may already be addressed in Market Participants' compliance frameworks such as their AFSL compliance; and
- set out how Eligible Trades are to be reported to the Administrator to facilitate the timely calculation and publication of the BBSW benchmark.

This document also sets out guidance for trading and reporting trades in Bank Paper to the Administrator, whether Eligible Trades or other trades in Bank Paper, for the purpose of ensuring the integrity of the BBSW benchmark.

### 1.2. Application

- These Guidelines are intended to apply to all Market Participants involved in the issuing and trading of Bank Paper and the reporting of Trade Reports to the Administrator.
- Market Participants includes Prime Banks, investors, banks and other participants who participate in the interbank and wholesale market for Bank Paper and transactions related to primary issuance of Bank Paper.
- These Guidelines also apply to Approved Trading Venues and Intermediaries involved in the trading, or reporting of trading, of Bank Paper.

- These Guidelines are not intended to apply to:
  - Transactions in Bank Paper for less than \$10 million;
  - Internal Trades of Market Participants;
  - Prime Banks' internal drawdown of their lending facility of bills of exchange accepted or endorsed by them or any subsequent internal return of such bills of exchange for extinguishment.

### 1.3. Reference Documentation

This document should be read in conjunction with:

- ASX BBSW Conventions
- ASX Prime Bank Conventions
- Part 7.5B of the Corporations Act
- ASIC Financial Benchmark (Administration) Rules
- ASIC Financial Benchmark (Compelled) Rules.

This document should also be read in conjunction with obligations of Market Participants at law, including under the Corporations Act, in connection with the issuing, trading and reporting of trading of Bank Paper.

### 1.4. Version History

This document has been revised according to the table below:

Version	Author	Comment	Date
V1.0	ASX Limited	First Draft	3 April 2017
V1.1	ASX Limited	Updated following Committee feedback	1 May 2017
V1.2	ASX Limited	Updated following Committee feedback	29 May 2017
V1.3	ASX Limited	Updated following Committee feedback	21 June 2017
V1.4	ASX Limited	Updated following Committee feedback	10 July 2017
V1.5	ASX Limited	Updated following public consultation	5 September 2017
V1.6	ASX Limited	Updated following Committee feedback	10 October 2017

V1.7	ASX Limited	Updated following periodic review and Committee feedback	21 <sup>st</sup> May 2018
V1.8	ASX Limited	Guidelines amended to cover reporting of all transactions in Bank Paper throughout the day in order to facilitate the monitoring of Market Participant activity in accordance with the Administrators licence obligations under ASIC Financial Benchmark Rules section 2.5.1 (3).	29 <sup>th</sup> October 2018
V1.8		Annual review of BBSW documentation. Wording taken from BBSW Conventions covering access and updates to Trade Reporting Officers to ensure consistency across documentation. Wording added to section 6.4 and 7.2	25 <sup>th</sup> February 2019
V1.8		Guidelines updated to include identification and reporting of suspicious transactions (section 2.5) and fall back provisions (section 8.4) in accordance with ASIC Financial Benchmark (Administration) Rules 2018.	1 <sup>st</sup> July 2019
V1.8		Annual review of BBSW documentation. Addition of section 2.6 to meet Australian Benchmark Administrator Licence obligations.	10 <sup>th</sup> February 2020
V1.9		Addition of Weighted LSR as defined by inclusion of Enhanced	4 <sup>th</sup> December 2020

	Calculation Methodology	
V2.0	Annual review of BBSW documentation. Hyperlinks of documentation updated to link to new ASX website.	11 <sup>th</sup> January 2021
V2.1	Annual review of BBSW documentation. Introduction updated to include secondary and tertiary BBSW calculation methodology. Updated to differentiate between the beginning of the RSW and Prime Bank Market Making obligations.	2 <sup>nd</sup> March 2022
v2.2	Annual review of BBSW documentation (no substantive changes).	14 October 2024

### 1.5. Definitions

- Administrator – means the entity responsible for the calculation and publication of BBSW in accordance with Part 7.5B of the Corporations Act and the ASIC Financial Benchmark (Administration) Rules.
- Approved Trading Venues (ATVs) – means those entities that facilitate trading and trade reporting of Bank Paper transactions.
- Bank Paper – means bills of exchange accepted or endorsed by Prime Banks or negotiable certificates of deposit issued by Prime Banks, or their dematerialised versions (EBAs and ECDs), with a parcel size of \$10 million or more, regardless of maturity date or tenor.
- BBSW – means Bank Bill Swap Rate.
- Bilateral Trades – means a transaction agreed by two Market Participants directly and is a non-Intermediated Trade.
- Buying Counterparty – means the buyer of Bank Paper.
- Contributors has the meaning in the ASIC Financial Benchmark (Administration) Rules.
- Conventions – means the ASX BBSW Conventions and ASX Prime Bank Conventions which detail the calculation methodology and governance for BBSW.
- EBAs – has the meaning given in the Austraclear Regulations.

- ECDs – has the meaning given in the Austraclear Regulations.
- Eligible Trades means all trades in Bank Paper that occur in the Rate Set Window for \$10 million or more and within the rolling maturity pool specified in the Conventions, other than where these Guidelines provide that they are not intended to apply to such trades or that those trades do not need to be reported.
- Intermediaries – means interdealer brokers and electronic platforms that facilitate trading of Bank Paper.
- Intermediated Trades – means a transaction agreed via an Intermediary.
- Internal Trades – means a transaction which occurs within the same Market Participant.
- Market Participants – means traders, issuers and investors in Bank Paper.
- Permitted Cancellation Circumstances has the meaning given in section 5.2.
- Primary Issuance – means the origination of a specific Bank Paper.
- Primary Calculation Methodology- Means the primary layer of the calculation waterfall for VWAP and WLSR calculations
- Prime Bank – means a designated sub-set of banks operating in Australia as defined in the ASX Prime Bank Conventions.
- Rate Set Window – means the period 8:30:00am to 10:00:00am AEST/AEDT during which Eligible Trades determine the BBSW rates.
- Secondary Market Trades – means any transaction in Bank Paper which is not the Primary Issuance of that Bank Paper.
- Selling Counterparty – means the seller of Bank Paper.
- Specified Contributor- means the Prime Banks and the Approved Trading Venues.
- Switches – means where a Market Participants rolls their Bank Paper exposure by trading out of one tenor and trading into another tenor at a net price.
- Trade Report – means the report of a Bank Paper transaction by a Trade Reporting Entity to a Trade Reporting Agent or by a Trade Reporting Agent to the Administrator, whether for an Eligible Trade or other trade in Bank Paper, other than where these Guidelines provide that they are not intended to apply to such trades such trades do not need to be reported.
- Trade Reporting Agent – means the Approved Trading Venues who offer a service for reporting Bank Paper transactions to the Administrator.
- Trade Reporting Entities – means the Prime Banks or other Market Participants (as applicable) who are responsible for reporting Bank Paper transactions to a Trade Reporting Agent.

- Trade Reporting Error – means an error in the details included in a Trade Report such that the Trade Report did not accurately reflect the terms of the Bank Paper transaction the subject of that Trade Report.
- Trade Reporting Failure – means a failure by a:
  - Trade Reporting Entity to provide a Trade Report to a Trade Reporting Agent within the timeframe specified in these Guidelines; or
  - Trade Reporting Agent to provide a Trade Report to the Administrator within the timeframe specified in these Guidelines.
- Trade Reporting Permitted Cancellation – means in respect of a Bank Paper transaction for which a Trade Report has been made, the cancellation of that transaction in a Permitted Cancellation Circumstance.
- Trade Reporting Officers – means those persons authorised to report Bank Paper transactions to a Trade Reporting Agent or to the Administrator on behalf of Trade Reporting Entities or Trade Reporting Agents (as applicable).
- Trade Reporting Procedures – means the procedures of the Trade Reporting Entity or Trade Reporting Agent for the reporting of Bank Paper transactions to a Trade Reporting Agent or to the Administrator (as applicable).
- Trade Reporting Window – means the period 8:30:00am to 10:15:00am AEST/AEDT during which trades effected in the Rate Set Window must be reported to the Administrator.

## 2. Governance

### 2.1. Segregation of Duties in respect of Bank Paper – Prime Banks

- Segregation within Prime Banks should ensure that information on the Prime Bank's net exposure to BBSW is not divulged to issuers or traders of Bank Paper either within the Prime Bank's business or externally.
- The goal of this for the purpose of these Guidelines is so that bids and offers for, and any transactions in, Bank Paper are not entered or undertaken by the Prime Bank for a purpose of seeking to influence the level at which BBSW is set or maintained (notwithstanding that a bid, offer, or transaction is likely to, or may, have that consequence).
- It is recognised that there may be circumstances where persons who are responsible for ensuring bank funding and who may have access to information as to the net exposure to BBSW may need to direct the issuance of Bank Paper. In these circumstances there should be internal policies to manage any conflict of interest.

## 2.2. Segregation of Duties in respect of Bank Paper – Non- Prime Bank Market Participants

- Segregation within Market Participants other than Prime Banks should ensure (other than where impractical) that information on the Market Participant's net exposure to BBSW is not divulged to issuers or traders of Bank Paper either within the Markets Participant's business or externally.
- The goal of this for the purpose of these Guidelines is so that bids and offers for, and any transactions in, Bank Paper are not entered or undertaken by the Market Participant for a purpose of seeking to influence the level at which BBSW is set or maintained (notwithstanding that a bid, offer, or transaction is likely to, or may, have that consequence).
- It is recognised that there may be circumstances where persons who are responsible for investment in Bank Paper and who may have access to information as to the net exposure to BBSW may need to direct the trading of Bank Paper. In these circumstances there should be internal policies to manage any conflict of interest.

## 2.3. Conflicts of Interest Handling

- Market Participants' internal policies should address conflicts of interest, including in relation to perceived or actual conflicts arising in their trading, distribution and trade reporting activity in Bank Paper.
- Market Participants should have in place adequate arrangements for the management of conflicts of interest that may arise in relation to activities undertaken by them (including their trading and trade reporting activity in Bank Paper). Where conflicts of interest are managed other than by avoiding the conflict, Market Participants should put in place processes and procedures to maintain a record of any decision making by an employee in line with the Market Participant's internal policies covering the perceived or actual conflict of interest. Senior compliance staff of the Market Participant should regularly review these decisions to ensure that the conflicts of interest policy is being adhered to.
- Market Participants should ensure all employees involved in the issuing and trading of Bank Paper and the reporting of trades that could be used by the Administrator to calculate BBSW, are aware of and fully compliant with the conflicts of interest policy.

## 2.4. Training

- Market Participants should ensure that personnel of Market Participants involved in the issuance, trading and trade reporting of Bank Paper have received training on compliance with the Market Participant's legal obligations, having regard to the applicable legal framework for BBSW and the trading of Bank Paper (including market misconduct prohibitions under the Corporation Act), in connection with such functions.
- Market Participants should ensure that ongoing training is provided to all relevant personnel.

## 2.5. Identification and reporting of suspicious transactions

- A Trade Reporting Entity must have in place a mechanism to report suspicious BBSW financial benchmark data. This may include a complaints policy or a whistleblowing policy.

- Where a Trade Reporting Entity has reasonable grounds to suspect that a person has engaged in activity in relation to BBSW financial benchmark data for the purpose of attempting to inappropriately influence the level at which BBSW rates are set or maintained, the Trade Reporting Entity should notify the Administrator at [benchmarksuspiciousactivity@asx.com.au](mailto:benchmarksuspiciousactivity@asx.com.au) (as specified in the [ASX Benchmarks Complaints Policy](#)) or ASIC at [markets@asic.gov.au](mailto:markets@asic.gov.au) without delay.
- Activity that gives rise to a suspicion described above is referred to in this section as “**suspicious activity**”.
- A Trade Reporting Entity will need to decide on a case by case basis whether activity is suspicious activity. Suspicious activity may include (either alone or in combination with other activities): unusual or unexpected transactions that do not make economic sense or that are significantly different to the prior day without cause of justification; or unusual communications between persons involved in the issuing and/or trading of Bank Paper; or unusual patterns in behaviour.
- Trade Reporting Entities should have procedures in place to ensure that, where activity that may be suspicious activity is reported internally, each report is reviewed in a timely manner, and escalated to the Administrator or ASIC if there are reasonable grounds for suspicion.
- Requirements in relation to the identification and reporting of suspicious BBSW rate submissions under the Final Stage Methodology, are set out in appendix C section 2.3.3 of the [BBSW Conventions and Methodology](#).

## 2.6. Specified Contributor attestation of compliance

- Specified Contributors must provide the Administrator with an annual attestation of compliance identifying whether the Specified Contributor has complied with the BBSW Trading Guidelines for the prior 12 month period and if not, identifying the extent of any non-compliance. The form of the attestation for ATVs will include that the ATV has provided any new user of the ATV services with these Guidelines prior to the commencement of the ATV service.
- The Administrator will contact each Specified Contributor on an annual basis to request the completion of the attestation of compliance.

## 3. Execution and Request For Quote

### 3.1. Bank Paper transactions to reflect genuine business purposes

- Trading in Bank Paper by a Market Participant should be based on its genuine business purposes to buy or sell Bank Paper, as determined by the Market Participant.
- Without limiting the matters it may have regard to and for the avoidance of doubt, in determining its genuine business purposes to buy or sell Bank Paper, a Market Participant may have regard to:
  - balance sheet or prudential requirements for management of liquidity by way of purchases of Bank Paper or similarly satisfying prudential funding requirements with the issuing or sale of Bank Paper
  - credit risk limit management when trading Bank Paper

- hedging of derivatives exposure
- management of the risk of concentration of investors in Bank Paper for liquidity management purposes
- perceived value opportunities, if buying, to acquire at a low price, or if selling, to sell at a high price
- the characteristics of certain investors
- in the case of a Prime Bank, its obligation to show two-way markets throughout the Rate Set Window in accordance with section 3.5 below.

### **3.2. Trading within the Rate Set Window**

- Trading in the Rate Set Window should reflect Market Participants' genuine business purposes at the time of the Rate Set Window. For this reason, the practices and processes of Market Participants should not delay trading Bank Paper for the purpose of avoiding trading in the Rate Set Window.
- Where a Market Participant intends to transact in Bank Paper and does not engage in transaction negotiations during the Rate Set Window, the Market Participant should adhere to internal policies regarding audit trails and record keeping.

### **3.3. Trade Execution Policy**

- Market Participants should have in place trade execution policies that, when issuing, buying or selling Bank Paper, seek to achieve market pricing reflective of genuine business purposes at the time of transacting.

### **3.4. Price quotation and trading**

- All Bank Paper trading must be conducted at an outright rate irrespective of whether trades are negotiated within or outside of the Rate Set Window. Pricing by each Market Participant may vary reflecting their genuine business purposes as to the volume of Bank Paper sought to be bought or sold.
- When determining an outright rate (including the rate of a bid or offer entered on an ATV) a Market Participant should have regard to its genuine business purposes. This may involve taking into account factors such as:
  - its genuine business purposes to buy or sell Bank Paper as referred to in section 3.1 above
  - underlying liquidity
  - investment demand to buy or sell Bank Paper
  - volume of Bank Paper to be traded
  - size of flow or enquiry
  - consistent pricing relativities to other related financial instruments
  - market environment.

- Bids and offers for, and any transactions in, Bank Paper (including the outright rate and volume for such bids, offers and transactions) by a Market Participant must not be for a purpose of seeking to influence the level at which BBSW is set or maintained (notwithstanding that a bid, offer, or transaction is likely to, or may, have that consequence).
- Prime Banks must quote at an outright rate and advise any investor requesting to trade at BBSW that they must trade at an outright rate.
- Where Switches are negotiated Market Participants must agree the individual tenor outright prices. The individual outright prices should be priced at prevailing market rates.
- A transaction is considered executed at the time both parties agree the terms of the trade.
- For the purposes of Trade Reports referred to in sections 6.6 and 7.3, the 'trade time' is to reflect such execution time, not when a trade or Trade Report is affirmed.

### **3.5. Price discovery and disclosure**

- Prime Banks are required to show two-way markets throughout the Rate Set Window on recognised ATVs from 8:40:00am till 10:00:00am in accordance with the ASX Prime Bank Conventions. The Prime Bank Market Making obligations commences 10 minutes after the commencement of the Rate Set Window (8:30:00am)
- Market making should be in accordance with the ASX Prime Bank conventions.
- Market Participants should, as part of their conflicts of interest handling requirements referred to in section 2.3 above, have in place appropriate handling of confidential client information policies and processes related to their clients' intent to trade.

### **3.6. Internal Trades**

- Internal Trades of Market Participants must not be reported.
- The Administrator may on a regular basis review the volume of Internal Trades undertaken and whether these should be reported for the purpose of BBSW calculation. If so, these Guidelines will be updated to capture the trading and trade reporting of such Internal Trades.

### **3.7. Minimum parcel size**

- For the purpose of BBSW calculation eligibility the minimum parcel size is \$10 million. Market Participants should not break up trades with the intention of avoiding inclusion in the rate set.

### **3.8. Volume adjustments**

- In the event that a Market Participant has executed a trade where they have purchased more Bank Paper than required, any reduction in the volume of Bank Paper purchased can only occur through the Market Participant entering into a separate transaction in which it is the seller of Bank Paper (which in these circumstances, can be a transaction for under \$10 million).

- The separate transaction must be at an outright rate that reflects the Market Participant's genuine business purposes in accordance with sections 3.1 to 3.4 above.
- Where the separate transaction has not been executed during the Rate Set Window, it will not be included for the purpose of BBSW calculation for that day.
- Where sales of Bank Paper are undertaken as a result of more Bank Paper being purchased than required Market Participants should follow internal policies regarding record keeping in respect of the initial trade to buy Bank Paper and separate trade to sell Bank Paper (including the reason for the trades and as to the timing of their execution).
- For the avoidance of doubt, where the initial trade is reportable under these Guidelines, any separate trade to reduce the volume of Bank Paper purchased is a trade which must be separately reported in accordance with these Guidelines.

## 4. Documentation

### 4.1. Record keeping

- Market Participants should ensure that they generate, or have access to, a timely and accurate record of transactions undertaken (and of executable quotes posted by them on ATVs) to ensure effective monitoring and to meet internal audit requirements.
- Market Participants that are unable to achieve segregation of duties should ensure that they maintain a record of decision making by an employee in line with their internal policies.
- A record should be kept of the rationale for any transaction at a price which is materially different from the current market price.
- Market Participants should follow internal policies for record keeping.

### 4.2. Time stamping of transaction

- All transactions must be time stamped and, where appropriate, voice recorded at the time the transaction (yield and volume) is agreed between the counterparties.
- The timestamp should be recorded with the transaction details.
- Time stamping mechanisms can take the form of a recorded line, e-platform ticket, e-mail or market chat pages.

### 4.3. Confirmation of Trade Reports

- Where:
  - a trade in Bank Paper is reported to a Trade Reporting Agent or occurs on an ATV that is a Trade Reporting Agent, and
  - the Trade Reporting Agent seeks to confirm details of the Trade Report with the trade counterparties,

the trade counterparties should provide an electronic confirmation of those Trade Report details to the Trade Reporting Agent or otherwise notify the Trade Reporting Agent if those details are incorrect.

- For all Eligible Trades, such electronic confirmation (or notification of incorrect details) should occur as soon as possible, and by no later than the end of the Trade Reporting Window.
- For all other trades, such electronic confirmation (or notification of incorrect details) should occur as soon as reasonably practicable, and by no later than 4:30pm.

## 5. Trade amendments and cancellations

### 5.1. Trade amendments

- For trades in Bank Paper, trade amendments can only occur through the relevant Market Participant entering into a separate transaction (which in these circumstances, can be a transaction for under \$10 million).
- Market Participants should have appropriate documentation for audit purposes of the initial trade and any separate trade, including the reason for the trades and as to the timing of their execution.
- The separate transaction must be at an outright rate that reflects the Market Participant's genuine business purposes in accordance with sections 3.1 to 3.4 above.
- Where the separate trade has not been executed during the Rate Set Window, it will not be included for the purpose of BBSW calculation for that day.
- For the avoidance of doubt, where the initial trade is reportable under these Guidelines, any separate trade to amend that trade, is a trade which must be separately reported in accordance with these Guidelines

### 5.2. Trade cancellations

- For trades in Bank Paper, Trade cancellations can only occur in the following permitted cancellation circumstances:
  - **credit restrictions:** in the case of a trade executed on an ATV, the trade would result in one of the counterparties to that trade exceeding its credit risk limits due to the identity of the issuer of that Bank Paper and the counterparties to the trade agree that the trade should accordingly be cancelled;
  - **execution error:** where the counterparties to the trade agree that one or more of the trade details recorded does not accurately reflect the executed trade and agree that the trade should accordingly be cancelled;
  - **genuine error:** where the counterparties agree that one or both of them entered into the trade in genuine error as to one or more terms of the trade and agree that the trade should accordingly be cancelled; or
  - **failed settlement:** where the trade failed to settle on the relevant settlement date and the counterparties to the trade agree that the trade should accordingly be cancelled,

**(“Permitted Cancellation Circumstances”).**

- If in circumstances other than the Permitted Cancellation Circumstances a Market Participant seeks to achieve the outcome of, in effect, cancelling a trade, the Market Participant must enter into a separate transaction. Such separate transaction is to be treated as a trade amendment under section 5.1 and is (together with the initial trade) subject to the requirements of that section.
- If a trade fails to settle on the relevant settlement date and the counterparties to the trade agree to settle the trade on a subsequent day (rather than cancelling the trade):
  - the failed settlement does not represent a Trade Reporting Permitted Cancellation and must not be notified under section 6.7 below;
  - a new Trade Report must not be made in respect of the subsequent settlement of that trade.
- Where a trade has been cancelled in the Permitted Cancellation Circumstances, Market Participants should have appropriate documentation for audit purposes of the trade and its cancellation, including the reason for the trade and its cancellation and as to the timing of its execution and cancellation.
- For trades in Bank Paper that have been cancelled prior to being reported to a Trade Reporting Agent, there is no requirement to report the original or cancelled trade to the Trade Reporting Agent.

## **6. Trade Reporting – Market Participants**

### **6.1. Trade reporting governance**

- Trade Reporting Entities should ensure that their trade reporting processes are placed within an appropriate governance structure.
- Trade Reporting Entities should ensure adequate internal oversight of their trade reporting activities. The level of oversight may vary depending on the nature, scale and complexity of each firm’s business.
- Trading Reporting Entities should have a documented policy relevant to their reporting procedures which identifies and provides for managing conflicts of interest. Records of conflict of interest situations should be kept and any advice that may be given in this regard.
- Trade Reporting Entities should consider how to ensure dealings in financial instruments by the entity that reference the benchmark do not influence the trade reporting activity.
- Complaints concerning the accuracy or integrity of the Trade Reporting Entity’s Trade Reports should be recorded and reviewed by the Trade Reporting Entity’s compliance or legal personnel. Such complaints and concerns should be thoroughly investigated and recorded appropriately.

### **6.2. Managing conflicts of interest**

- The Trade Reporting Entity should, as part of its conflicts of interest handling requirements referred to in 2.3 above, have a documented policy relevant to the Trade Reporting Procedures which identifies and provides for managing conflicts of interest that a Trade Reporting Officer may face arising from their other responsibilities in the organisation.

### 6.3. Record keeping of conflicts of interest

- The Trade Reporting Entity should keep a record of situations which give rise to a conflict of interest for the Trade Reporting Officer and any advice given to the officer in this regard. Such records should be provided on a regular basis to the Trade Reporting Entity's compliance or legal function.

### 6.4. Authorisation of Trade Reporting Officer

- The Trade Reporting Entity should only authorise Trade Reporting Officers who have the necessary knowledge and have undergone the required training to accurately follow the Trade Reporting Procedures in a timely and consistent manner. Only authorised Trade Reporting Officers are to be granted access to trade report via an ATV.
- Trade Reporting Entities must notify:
  - Trade Reporting Agents to whom it may provide Trade Reports; and
  - the Administrator,of the Trade Reporting Officers for that Trade Reporting Entity.
- The list of Trade Reporting Officers is to be updated with the Administrator and ATV as changes occur.

### 6.5. Responsibility for trade reporting

- Where a trade occurs on an ATV that is a Trade Reporting Agent, the trade does not need to be separately reported to the Trade Reporting Agent.
- Primary Issuance transactions must be reported to the Trade Reporting Agent by the Issuer of Bank Paper.
- Secondary Market Trades that occur on a bilateral basis must be reported to the Trade Reporting Agent by the seller of Bank Paper unless otherwise agreed by the parties.
- Where parties have agreed that Secondary Market Trades that occur on a bilateral basis be reported by a party other than the seller of Bank Paper, a record of that agreement must be maintained.
- Primary Issuance transactions that are Internal Trades of Market Participants must not be reported to the Trade Reporting Agent.
- Secondary Market Trades that are Internal Trades of Market Participants must not be reported to the Trade Reporting Agent.

### 6.6. Trade reporting requirements

- trades in Bank Paper must be reported by one side to that transaction.
- trades in Bank Paper must be reported to the Trade Reporting Agent.

- Eligible Trades should be reported to the Trade Reporting Agent within 20 minutes of the trade being executed and must be reported by no later than the end of the Trade Reporting Window. Eligible Trades that occur less than 20 minutes from the end of the Trade Reporting Window must still be reported by no later than the end of the Trade Reporting Window.
- All other trades must be reported to the Trade Reporting Agent as soon as practicable and by no later than 4:30pm.
- Market Participants should not break up the reporting of trades with the intention of avoiding inclusion in the rate set.
- Note that where a single trade occurs, which is for the benefit of multiple underlying funds, Market Participants should report trades executed on a block basis not allocated basis.
- The following details must be reported:
  - ISIN
  - Trade Date
  - Trade Time (in the format of hour:minute:second) (if second is not known it can be rounded to the nearest minute)
  - Trade identifier
  - Issuer
  - Maturity Date
  - Tenor
  - Settlement Date (optional unless settling on a date other than the transaction date)
  - Volume
  - Yield
  - Selling Counterparty (LEI)
  - Buying Counterparty (LEI)
  - Settlement Amount (optional)
- Where a Selling Counterparty or Buying Counterparty does not have an LEI, an identifier representing the naming convention for that counterparty, as agreed to by the Administrator, is to be specified.
- All Trade Reports to a Trade Reporting Agent must contain all the details referred to above prior to the end of the Trade Reporting Window. ASX will not accept any incomplete Trade Reports and will not use incomplete Trade Report data in the calculation of BBSW.

- Trade Reporting Entities should check trade yield and volume for reasonableness before the trade is reported. Where trade yields or volume do not appear reasonable they should be investigated to confirm the accuracy of the yield and volume before the trade is reported.

## 6.7. Trade Reporting Errors, Trade Reporting Failures and Trade Reporting Permitted Cancellations

- This section 6.7 deals with:
  - **Trade Reporting Errors:** an error in the details included in a Trade Report by a Trade Reporting Entity to a Trade Reporting Agent, such that the Trade Report did not accurately reflect the terms of the Bank Paper transaction the subject of that Trade Report;
  - **Trade Reporting Failures:** a failure by a Trade Reporting Entity to provide a Trade Report to a Trade Reporting Agent within the timeframe specified in the Guidelines; and
  - **Trade Reporting Permitted Cancellations:** a Trade Report by a Trade Reporting Entity to a Trade Reporting Agent in respect of a Bank Paper transaction which is subsequently cancelled in a Permitted Cancellation Circumstance.

### 6.7.1. Timely notification of error, failure to report and cancellation of a trade

- For Eligible Trades, the Trade Reporting Entity must advise the Trade Reporting Agent of any Trade Reporting Error, Trade Reporting Failure or Trade Reporting Permitted Cancellation prior to 10:20:00am on that day.
- After 10:20:00am, the Trade Reporting Entity must notify the Trade Reporting Agent of any Trade Reporting Error, Trade Reporting Failure or Trade Reporting Permitted Cancellation, that could impact the rate set, as soon as practicable.
- It is helpful, but not mandatory, for Trade Reporting Entities to advise the Administrator of any Trade Reporting Error, Trade Reporting Failure or Trade Reporting Permitted Cancellation, that could impact the rate set, post 10:20:00am. This notification can be provided by email ([ASXBpricing@asx.com.au](mailto:ASXBpricing@asx.com.au)).
- For all other trades in Bank Paper, any Trade Reporting Error, Trade Reporting Failure or Trade Reporting Permitted Cancellation, should be notified promptly by the Trade Reporting Entity to the Trade Reporting Agent and by no later than the end of the trade execution date.
- Non – Prime Bank Market Participants that trade bilaterally with a Prime Bank where the Prime Bank is the relevant Trade Reporting Entity should notify the Prime Bank, both by telephone and email, of any Trade Reporting Errors, Trade Reporting Failures or Trade Reporting Permitted Cancellations that they become aware of.

### 6.7.2. Manner of reporting error, failure to report and cancellation of a trade

- A Trade Reporting Entity must, via one of its Trade Reporting Officers, notify the Trade Reporting Agent of any Trade Reporting Error, Trade Reporting Failure or Trade Reporting Permitted Cancellation together with the following details:
  - in the case of a Trade Reporting Error, of the inaccurate details included in the Trade Report;

- in the case of a Trade Reporting Failure, of the details of the trade as referred to in 6.6 above; or
  - in the case of a Trade Reporting Permitted Cancellation, of the details of the trade included in the Trade Report which was subsequently cancelled.
- Trade Reporting Agents will notify Market Participants of the persons at the Trade Reporting Agents who such notification can be provided to, including the telephone and email contact details for those persons.

#### 6.7.3. Investigation of error, failure to report and cancellation of a trade

- The source of Trade Reporting Errors, Trade Reporting Failures and Trade Reporting Permitted Cancellations should be investigated with records kept of the results of any such investigation. Where appropriate, measures to mitigate the risk of recurrence should be put in place.

#### 6.7.4. Records of error, failure to report and cancellation of a trade

- Detailed records should be kept around any Trade Reporting Errors, Trade Reporting Failures and Trade Reporting Permitted Cancellations.

### 6.8. Trade reporting systems

- Trade Reporting Entities should have sufficient systems to enable timely and accurate trade reporting.
- Trade Reporting Entities should have adequate security for trade reporting systems.
- Trade Reporting Entities should have a contingency plan for making Trade Reports in the event of a failure in trade reporting or related systems.

## 7. Trade Reporting – Trade Reporting Agents

### 7.1. Trade reporting governance

- Complaints concerning the accuracy or integrity of the Trade Reporting Agent's Trade Reports should be recorded and reviewed by the Trade Reporting Agent's compliance or legal personnel. Such complaints and concerns should be thoroughly investigated and recorded appropriately.
- For trades in Bank Paper reported to a Trade Reporting Agent or occurring on an ATV that is a Trade Reporting Agent, it is best practice for the Trade Reporting Agent to have an electronic confirmation from the trade counterparties as to the details of the trade reported to the Trade Reporting Agent or occurring on the ATV, when reporting the trade to the Administrator. If a Trade Reporting Agent has not received such electronic confirmation by the time that it is required to report the trade, the trade still needs to be reported.

### 7.2. Authorisation of Trade Reporting Officer

- The Trade Reporting Agent should only authorise Trade Reporting Officers who have the necessary knowledge and have undergone the required training to accurately follow the Trade Reporting Procedures in a timely and consistent manner.

- Trade Reporting Agents must notify the Administrator of the Trade Reporting Officers for that Trade Reporting Agent. The list of Trade Reporting Officers is to be updated with the Administrator as changes occur.

### 7.3. Trade reporting requirements

- All Eligible Trades that were reported to the Trade Reporting Agent during the Trade Reporting Window or which occurred on an ATV that is a Trade Reporting Agent must be reported to the Administrator by no later than the end of the Trade Reporting Window.
- All other trades which were reported to the Trade Reporting Agent or which occurred on an ATV that is a Trade Reporting Agent must be reported to the Administrator as soon as practicable and by no later than 4:30pm.

The following details must be reported:

- Trade Reporting Agent Identifier
  - ISIN
  - Trade Date
  - Trade Time (in the format of hour:minute:second) (if second is not known it can be rounded to the nearest minute)
  - Trade identifier
  - Issuer
  - Maturity Date
  - Tenor
  - Settlement Date (optional unless settling on a date other than the transaction date)
  - Volume
  - Yield
  - Selling Counterparty (LEI)
  - Buying Counterparty (LEI)
  - Settlement Amount (optional)
  - Bilateral Trade or Intermediated Trade flag
- Where a Selling Counterparty or Buying Counterparty does not have an LEI, an identifier representing the naming convention for that counterparty, as agreed to by the Administrator, is to be specified.
  - All Trade Reports to the Administrator must contain all the details referred to above. ASX will not accept any incomplete Trade Reports and will not use incomplete Trade Report data in the calculation of BBSW.

- All Trade Reports to the Administrator must be in a format or protocol as required by the Administrator.

#### 7.4. Trade Reporting Errors, Trade Reporting Failures and Trade Reporting Permitted Cancellations

- This section 7.4 deals with:
  - **Trade Reporting Errors:** an error in the details included in a Trade Report by a Trade Reporting Agent to the Administrator, such that the Trade Report did not accurately reflect the terms of the Bank Paper transaction the subject of that Trade Report;
  - **Trade Reporting Failures:** a failure by a Trade Reporting Agent to provide a Trade Report to the Administrator within the timeframe specified in these Guidelines; and
  - **Trade Reporting Permitted Cancellations:** a Trade Report by a Trade Reporting Agent to the Administrator in respect of a Bank Paper transaction which is subsequently cancelled in a Permitted Cancellation Circumstance,

including in respect of a Trade Reporting Error, Trade Reporting Failure or Trade Reporting Permitted Cancellation notified by a Trade Reporting Entity to the Trade Reporting Agent under section 6.7.

##### 7.4.1. Timely notification of error, failure to report and cancellation of a trade

- For Eligible Trades, the Trade Reporting Agent must advise the Administrator of any Trade Reporting Error, Trade Reporting Failure or Trade Reporting Permitted Cancellation prior to 10:20:00am on that day.
- After 10:20:00am, the Trade Reporting Agent must notify the Administrator of any Trade Reporting Error, Trade Reporting Failure or Trade Reporting Permitted Cancellation, that could impact the rate set, as soon as practicable.
- For all other trades in Bank Paper any Trade Reporting Error, Trade Reporting Failure or Trade Reporting Permitted Cancellation, should be notified promptly by the Trade Reporting Agent to the Administrator and by no later than the end of the trade execution date.

##### 7.4.2. Manner of reporting error, failure to report and cancellation of a trade

- A Trade Reporting Agent must, via one of its Trade Reporting Officers, notify the Administrator of any Trade Reporting Error, Trade Reporting Failure or Trade Reporting Permitted Cancellation together with the following details:
  - in the case of a Trade Reporting Error, of the inaccurate details included in the Trade Report;
  - in the case of a Trade Reporting Failure, of the details of the trade as referred to in 7.3 above; or
  - in the case of a Trade Reporting Permitted Cancellation, of the details of the trade included in the Trade Report which was subsequently cancelled.
- The notification referred to above must be provided:  
in a format or protocol as required by the Administrator.

#### 7.4.3. Investigation of error, failure to report and cancellation of a trade

- The source of Trade Reporting Errors, Trade Reporting Failures or Trade Reporting Permitted Cancellations should be investigated with records kept of the results of any such investigation. Where appropriate, measures to mitigate the risk of recurrence should be put in place.

#### 7.4.4. Records of error, failure to report and cancellation of a trade

- Detailed records should be kept around any Trade Reporting Errors, Trade Reporting Failures and Trade Reporting Permitted Cancellations.

### 7.5. Trade reporting systems

- Trade Reporting Agents should have sufficient systems to enable timely and accurate trade reporting.
- Trade Reporting Agents should have adequate security for trade reporting systems.
- Trade Reporting Agents must have a contingency plan for making Trade Reports in the event of a failure in trade reporting or related systems.

## 8. BBSW Publication - Administrator

### 8.1. BBSW publication

- The Administrator will, in respect of Eligible Trades reported to the Administrator during the Trade Reporting Window on a day, calculate and publish the BBSW for that day by 10:30:00am on that day.

### 8.2. Update to BBSW publication for notified error, failure to report and cancellation of an Eligible Trade

- **Notification to Administrator before 10:20:00am:** Where a Trade Reporting Error, Trade Reporting Failure or Trade Reporting Permitted Cancellation in respect of an Eligible Trade has been advised to the Administrator by the Trade Reporting Agent in accordance with section 7.4 before 10:20:00am on the day of the trade, the Administrator will reflect the correction to the Trade Report or the notified trade or trade cancellation in the BBSW calculated and published for that day.
- **Notification to Administrator between 10:20:00am and 11:30:00am:** Where a Trade Reporting Error, Trade Reporting Failure or Trade Reporting Permitted Cancellation in respect of an Eligible Trade has been advised to the Administrator by the Trade Reporting Agent in accordance with section 7.4 after 10:20:00am but before 11:30:00am on the day of the trade, the Administrator will, subject to materiality thresholds as announced by the Administrator – being, as at the date of the Guidelines, a difference of 3 basis points between the published rate and the corrected rate, calculate and publish a revised BBSW for that day by 12:00:00pm on that day.
- **Notification to Administrator after 11:30:00am:** Where a Trade Reporting Error, Trade Reporting Failure or Trade Reporting Permitted Cancellation in respect of an Eligible Trade has been advised to the Administrator by the Trade Reporting Agent in accordance with section 7.4 after 11:30:00am on the day of the trade, or on a subsequent day, ASX will **not** calculate and publish a revised BBSW for that day. ASX

will however report such notified errors, failures to report a trade or trade cancellations one month in arrears as part of the log maintained by the Administrator referred to in section 8.3.

### 8.3. Log of errors, failures to report and cancellations of Eligible Trades

- The Administrator will maintain a log of Trade Reporting Errors, Trade Reporting Failures and Trade Reporting Permitted Cancellations in respect of Eligible Trades notified after 10:20:00am. The Administrator will publish the log to the market on a monthly basis. For each notified Trade Reporting Error, Trade Reporting Failure and Trade Reporting Permitted Cancellation, the magnitude of impact on published BBSW for the relevant day will be included but not the direction of that impact (ie whether increases or decreases the BBSW).

### 8.4. Fall back provisions

- ASX encourages participants to have robust fall back provisions written into their contractual documentation to address the cessation of or Material Change (as defined in the BBSW Conventions) to the BBSW benchmark. Stakeholders should be aware that various factors beyond the control of ASX may necessitate changes to the benchmark. Users of BBSW are advised to periodically consider how they may be affected by the above and to review the suitability of the benchmark in meeting their requirements, giving consideration to the matters in Section 6.1 of the BBSW Conventions.

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