



ASIC

Australian Securities &
Investments Commission

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Contents

Australian Securities and Investment Commission: Infringement Notice

Recipient: Westpac Banking Corporation

The recipient has complied with the infringement notice. Compliance is not an admission of guilt or liability; and the recipient is not taken to have contravened subsection Rule 2.2.1 of the *ASIC Derivative Transaction Rules (Reporting) 2013*.

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**PART 7.5A OF THE CORPORATIONS REGULATIONS 2001
INFRINGEMENT NOTICE**

To: Westpac Banking Corporation
Westpac Place
Level 20, 275 Kent Street
SYDNEY NSW 2000

Take Notice: The Australian Securities and Investments Commission (*ASIC*) gives this infringement notice to Westpac Banking Corporation ACN 007 457 141 (*Westpac*) under regulation of 7.5A.104 of the *Corporations Regulations 2001 (Regulations)*. To comply with this notice Westpac must:

Pay a penalty to ASIC on behalf of the Commonwealth, in the sum of **\$127,250**.

This infringement notice is given on 5 May 2017.

The unique code for this notice as required by paragraph 7.5A.106(b) of the Regulations is **R20170000269264**.

The terms defined in Rule 1.2.3 of the *ASIC Derivative Transaction Rules (Reporting) 2013 (ASIC Rules)* have the same meaning when used in this notice. Certain additional defined terms used in this notice are also set out in Appendix A to this notice.

Alleged contraventions

At all relevant times, subrule 2.2.1(1) of the ASIC Rules required Westpac to report information about each of its Reportable Transactions that was the entry into an OTC Derivative to a Licensed Repository or a Prescribed Repository, generally by no later than the end of the next Business Day after entry into the OTC Derivative.

ASIC has reasonable grounds to believe that Westpac has contravened subrule 2.2.1(1) of the ASIC Rules on 398 separate occasions by failing to report information about each of the Reportable Transactions identified in Schedule 1 (each a *Selected Transaction*) to a Licensed Repository or a Prescribed Repository within the specified timeframe.

Background

On 10 April 2015, and in subsequent correspondence dated 6 and 15 May 2015, Westpac self-reported to ASIC that during the period from 2 October 2013 to 30 April 2015 (*Relevant Period*) it failed to report information about 112,556 Reportable Transactions (*Unreported Transactions*), as required by Rule 2.2.1.

During the Relevant Period there were 398 Business Days (each a *Reporting Day*) on which Westpac was required to report information about one or more Unreported Transactions. The 398 Selected Transactions are a subset of the Unreported Transactions, selected by ASIC, being one selected Unreported Transaction that was required to be reported on each of the 398 Reporting Days during the Relevant Period.

Westpac designed its derivative transaction reporting systems with the understanding that the institutional bank system known as “Calypso” captured all relevant transactions required to be reported under the ASIC Rules.

That understanding was erroneous as certain transactions (*FMS Transactions*) that were Reportable Transactions and were entered into Westpac’s deal capture system flowed through to an accounting and settlement system known as “FMS” and did not flow through to Calypso to be extracted for reporting purposes.

Westpac’s Global Derivatives Reform Team (*GDR Team*) became aware of this flaw in July 2014, though the team did not know at that time the number of FMS Transactions that had not been reported due to the reporting system flaw.

At the time the GDR Team determined that it would not have been reasonable to divert significant project resources from management of ongoing development and implementation of new reporting processes and fields to further investigate what it expected to be a potentially small number of Reportable Transactions.

In the months leading up to 1 October 2014 the GDR Team undertook a significant program of work to address reporting consent requirements for transaction reporting under the ASIC Rules. Westpac prioritised its resources on external counterparties and system building to manage these requirements. Further analysis and verification of the FMS Transactions remained an outstanding task to be completed at a later date.

By March 2015, an investigation by Westpac into the transaction information for FMS Transactions showed that there was potentially a material population of underlying foreign exchange derivative transactions transacted by the business and retail channels that were not feeding into Westpac's core trade reporting processes.

This issue was escalated to the GDR Programme Director, senior business representatives and the WIB compliance team on 11 March 2015, and self-reported to ASIC on 10 April 2015.

On 2 October 2015 Westpac advised ASIC that it had implemented interim solutions that resolved outstanding issues in its reporting systems and enabled it from that time to report information about FMS Transactions in compliance with the ASIC Rules.

Westpac reported the Unreported Transactions to DTCC between 1 January 2016 and 22 January 2016.

Subsequently, on 28 September 2016, Westpac advised ASIC that in the period from 22 May 2015 to 26 August 2016 reports for certain foreign exchange derivatives transactions settled through the FMS system (including the back loaded information for the Unreported Transactions) were submitted to DTCC by Westpac with the counterparty buyer/seller information inadvertently reversed.

Details of alleged contraventions

Westpac is an entity that is incorporated in this jurisdiction and so is an Australian Entity within the meaning given by Rule 1.2.3 and a Reporting Entity within the meaning given by Rule 1.2.5.

Westpac was provisionally registered as a swap dealer with the US Commodity Futures Trading Commission on 31 December 2012 and continued to be provisionally registered throughout the Relevant Period. As such, Westpac was a Reporting Entity that was first required to start complying with subrule 2.2.1(1) as part of Phase 1.

Westpac entered into the 398 Selected Transactions during the Relevant Period, which was during a Reporting Period (within the meaning given by paragraph S1.1.1(1)(c)).

Each Selected Transaction was a Reportable Transaction, in that:

- (a) each Selected Transaction was the entry into of an arrangement that is a foreign exchange derivative by Westpac as counterparty; and
- (b) each foreign exchange derivative is an OTC Derivative, as each is a derivative in a Prescribed Class and was not able to be traded on a Part 7.2A Market or a Regulated Foreign Market during the Relevant Period.

Throughout the Relevant Period there was a Prescribed Repository that was prescribed in relation to foreign exchange derivatives.

From 15 September 2014 there was a Licensed Repository authorised to provide services in respect of foreign exchange derivatives, namely DTCC.

Westpac was required to report information about each of its Reportable Transactions in foreign exchange derivatives:

- (a) from 1 October 2013 to 14 September 2014 (inclusive) – a Prescribed Repository; and
- (b) from 15 September 2014 to 30 September 2014 (inclusive) – DTCC; and
- (c) from 1 October 2014 onwards – DTCC.

For each Selected Transaction, Westpac was required to report the Derivative Transaction Information to a Prescribed Repository or DTCC (as applicable) by no later than the end of the next Business Day after entering into the Selected Transaction.

Westpac failed to do so for each of the Selected Transactions, and instead reported the information between 1 January 2016 and 22 January 2016.

Maximum pecuniary penalty in relation to a contravention of Rule 2.2.1

The maximum pecuniary penalty that a Court could order Westpac to pay for a single contravention of Rule 2.2.1 that occurred during the Relevant Period is \$170,000: see ss 901E, 1317E, 1317G(1DA) and 1317G(1DB) of the Corporations Act and Rule 2.2.1 of the ASIC Rules.

The maximum pecuniary penalty that may be payable by Westpac under an infringement notice given under regulation 7.5A.104 of the Regulations by reason of a single alleged contravention of Rule 2.2.1 that occurred during the Relevant Period is \$34,000: see subsection 901F(2) of the Corporations Act and regulation 7.5A.107 of the Regulations and Rule 2.2.1 of the ASIC Rules.

Penalties under the Infringement Notice

The penalty payable under this infringement notice for each individual alleged contravention of Rule 2.2.1 is as follows:

- \$12,750 for the alleged contravention relating to the Selected Transaction occurring on 1 October 2013;
- \$100 for each of the 210 alleged contraventions relating to the 210 corresponding Selected Transactions occurring between 2 October 2013 and 31 July 2014; and
- \$500 for each of the 187 alleged contraventions relating to the 187 corresponding Selected Transactions occurring between 1 August 2014 and 29 April 2015.

The total penalty payable under this notice is the sum of the individual penalties imposed for each individual alleged contravention of Rule 2.2.1, being \$127,250: see subregulation 7.5A.107(2) of the Regulations. Therefore, the total penalty that Westpac must pay to the Commonwealth is \$127,250.

The penalty is payable to ASIC on behalf of the Commonwealth. Payment may be made by bank cheque to the order of the "Australian Securities and Investments Commission".

In determining this matter and the appropriate pecuniary penalty to be applied, ASIC noted in particular the following:

- The extent and duration of Westpac's alleged contravening conduct is significant and is best understood in the context of its nature and circumstances.
- While large in number, the Unreported Transactions represented a lower proportion by value—approximately 0.08%—and so the impact on transparency and on ASIC's oversight and monitoring of systemic risk and prevention of market abuse was low in this case.
- There were two distinct periods in which contravening conduct occurred:
 - The first period, from the commencement of its obligation to report derivative transactions under rule 2.2.1 on 2 October 2013 to July 2014 when Westpac's GDR Team became aware of FMS Transactions in foreign exchange derivatives executed for customers of Westpac's retail and business banking channels and that these derivatives transactions were not being reported to a Prescribed Repository; and
 - The second period, from the end of the first period to 30 April 2015.

- The conduct in the first period involved the design and use of a reporting system to report derivatives transactions which did not capture information about the FMS Transactions for reporting to DTCC. Westpac undertook a significant programme of work in seeking to ensure compliance with the ASIC Rules. Nevertheless, due to a lack of due care and diligence in design and inadvertence thereafter (rather than any recklessness, knowledge or mal-intent), Westpac's design of its reporting system was flawed and its supervision and monitoring arrangements did not detect the issue during the first period.
- There is substantial overlap in the circumstances of the alleged contraventions in the first and second periods. Even so, the conduct in the second period is factually distinct from the conduct in the first period. Westpac's conduct in the second period is of a different nature due to Westpac's GDR Team's:
 - awareness that its reporting systems did not capture and report FMS Transactions as required by the ASIC Rules;
 - awareness and that it would continue to fail to report FMS Transactions (although it did not know how many) until further investigation was conducted and the reporting system flaw was resolved;
 - decision to defer further investigation of the reporting system flaw and of the number and volume of the FMS Transactions until an unspecified later time when more resources may be available; and
 - failure to investigate and escalate the issue to senior management or Westpac Institutional Bank Compliance until March 2015.
- In ASIC's view, these circumstances give the conduct and alleged contraventions in the second period a higher degree of fault than Westpac's carelessness in the first period; meaningfully differentiating the conduct in the second period.
- ASIC found the alleged contravening conduct involved in the first alleged contravention sat towards the lower end of the middle range of possible contraventions of rule 2.2.1. While Westpac undertook significant work with intent to build a compliant reporting system, its execution in designing, validating and using a reporting system which did not capture a subset of derivatives transactions executed by its retail and business banking businesses was careless. In setting this penalty amount, it was also significant that no significant loss or harm was caused by Westpac's conduct.
- The penalty amounts specified for each of the remaining 210 alleged contraventions in the first period recognise the substantial interrelationship between the alleged contravening conduct in the first period and so do not seek to duplicate the penalty specified for the conduct of the first alleged contravention. A nominal penalty amount of \$100 responds separately to the continuing failure of Westpac's monitoring and supervision arrangements to identify the flaw, highlighted in each of these contraventions in the first period, but acknowledges this conduct was inadvertent.

- ASIC's use of its discretion to allege contraventions in respect of the Selected Transactions, being one Unreported Transaction relating to each of the 398 Reporting Days, takes into account the extent and duration of the alleged contraventions in both the first and second periods identified in this matter.
- The penalties specified for the alleged contraventions in the second period recognise the substantial interrelationship between the alleged contravening conduct in the first and second periods and so do not seek to duplicate penalties specified for the conduct in the first period. The penalties for the alleged contraventions in the second period reflect the distinct nature of the conduct and a stronger need to deter Westpac and others from deferring proper investigation, escalation and reporting to ASIC (if required) of suspected contraventions to a more convenient and significantly later time. Had greater loss and harm been suffered as a result of this conduct, higher penalties would have been necessary to achieve the objects of deterrence.

Compliance with the Infringement Notice

Westpac may choose not to comply with this infringement notice, but if Westpac does not comply, civil proceedings may be brought against Westpac in relation to the alleged contraventions.

To comply with this infringement notice, Westpac must pay the total penalty of \$127,250 within the compliance period. The compliance period:

- (a) starts on the day on which the infringement notice is given to Westpac; and
- (b) ends 27 days after the day on which the infringement notice is given to Westpac;

unless an application is made for an extension.

Westpac may apply to ASIC for an extension of time to comply with this notice under regulation 7.5A.109 of the Regulations. If Westpac does so, and the application is granted, the compliance period ends at the end of the further period allowed.

If Westpac applies for a further period of time in which to comply with this notice, and the application is refused, the compliance period ends on the later of:

- (a) 28 days after the day on which the infringement notice was given to Westpac; and
- (b) 7 days after the notice of refusal is given to Westpac.

Westpac may apply to ASIC for withdrawal of this notice under regulation 7.5A.111 of the Regulations. If Westpac does so, and the application is refused, the compliance period ends 28 days after the notice of refusal is given to Westpac.

Effect of issue and compliance with Infringement Notice

Under subregulation 7.5A.110(2) of the Regulations, the effects of compliance with this infringement notice are:

- (a) any liability of Westpac to the Commonwealth for the alleged contraventions of Rule 2.2.1 of the ASIC Rules is discharged;

- (b) no civil or criminal proceedings will be brought or continued by the Commonwealth against Westpac for the conduct specified in the infringement notice as being the conduct that made up the alleged contraventions of Rule 2.2.1 of the ASIC Rules;
- (c) no administrative action may be taken by ASIC under section 914A, 915B, 915C or 920A of the Corporations Act against Westpac for the conduct specified in the infringement notice as being the conduct that made up the alleged contraventions of Rule 2.2.1 of the ASIC Rules;
- (d) Westpac is not taken to have admitted guilt or liability in relation to the alleged contraventions; and
- (e) Westpac is not taken to have contravened Rule 2.2.1 of the ASIC Rules.

However, these effects do not apply if Westpac has knowingly provided false or misleading information to ASIC or withheld evidence or information from ASIC in relation to the alleged contraventions of Rule 2.2.1 of the ASIC Rules.

Publication

ASIC may publish details of this infringement notice under regulation 7.5A.115 of the Regulations.

Signature of delegate giving the notice

Signed



Andrew James Templer

as a delegate of the Australian Securities and Investments Commission

Appendix A: Relevant Definitions

Term	Definition
ASIC	means the Australian Securities and Investments Commission
ASIC Rules	means the <i>ASIC Derivative Transaction Rules (Reporting) 2013</i>
Business Day	has the meaning given in Rule 1.2.3 of the ASIC Rules
Corporations Act	means the <i>Corporations Act 2001 (Cth)</i>
Derivative Transaction Information	has the meaning given in Rule 1.2.3 of the ASIC Rules
DTCC	means DTCC Data Repository (Singapore) Pte. Ltd.
FMS	means a Westpac banking system that carries out a number of functions for non-institutional (retail and banking) channels
GDR Team	means the Westpac Global Derivative Reform Project Team
Licensed Repository	has the meaning given in Rule 1.2.3 of the ASIC Rules
Phase 1	has the meaning given in Rule 1.2.3 of the ASIC Rules
Prescribed Class	has the meaning given in Rule 1.2.3 of the ASIC Rules
Prescribed Repository	has the meaning given in Rule 1.2.3 of the ASIC Rules
Regulated Foreign Market	has the meaning given in Rule 1.2.4 of the ASIC Rules
Relevant Jurisdiction	has the meaning given in Rule 1.2.3 of the ASIC Rules
Relevant Period	means from 2 October 2013 to 30 April 2015 (inclusive)
Reportable Transaction	has the meaning given in Rule 1.2.5 of the ASIC Rules
Reporting Day	means a Business Day on which Westpac was required to report information about an Unreported Transaction in accordance with Rule 2.2.3 of the ASIC Rules See Appendix B
Reporting Entity	has the meaning given in Rule 1.2.5 of the ASIC Rules
Selected Transactions	means the derivative transactions identified in Schedule 1

Unreported Transactions	means the 112,556 Reportable Transactions identified by Westpac as not having been reported during the Relevant Period to a Licensed Repository or a Prescribed Repository as required by Rule 2.2.1 of the ASIC Rules
Westpac	means Westpac Banking Corporation (ACN 007 457 141)
WIB	means Westpac Institutional Bank

Appendix B: Reporting Days during the Relevant Period

During the Relevant Period, every day was a Reporting Day, other than the following:

- All Saturdays throughout the Relevant Period – 82 days
- All Sundays throughout the Relevant Period – 82 days
- 25 December 2013 – Christmas Day
- 26 December 2013 – Boxing Day
- 1 January 2014 – New Years Day
- 27 January 2014 – Australia Day
- 18 April 2014 – Good Friday
- 21 April 2014 – Easter Monday
- 25 April 2014 – ANZAC Day
- 25 December 2014 – Christmas Day
- 26 December 2014 – Boxing Day
- 1 January 2015 – New Years Day
- 26 January 2015 – Australia Day
- 3 April 2015 – Good Friday
- 6 April 2015 – Easter Monday

Schedule 1: Description of the 398 Selected Transactions

Trade Date	Trade Unique Transaction Identifier
1/10/2013	1030398220W_CRFMOL_FXCCE_0304159793
2/10/2013	1030398220W_CRFMOL_FXCCE_1726430137
3/10/2013	1030398220W_CRFMOL_FXCCE_1726438844
4/10/2013	1030398220W_CRFMCS_FXCCE_0184054612
7/10/2013	1030398220W_CRFMOL_FXCCE_1726448801
8/10/2013	1030398220W_CRFMOL_FXCCE_2136032120
9/10/2013	1030398220W_CRFMOL_FXCCE_1726777243
10/10/2013	1030398220W_CRFMOL_FXCCE_0842024290
11/10/2013	1030398220W_CRFMCS_FXCCE_1976000266
14/10/2013	1030398220W_CRFMOL_FXCCE_1604096998
15/10/2013	1030398220W_CRFMOL_FXCCE_1726535495
16/10/2013	1030398220W_CRFMOL_FXCCE_0764097308
17/10/2013	1030398220W_CRFMOL_FXCCE_0164091629
18/10/2013	1030398220W_CRFMOL_FXCCE_0732032616
21/10/2013	1030398220W_CRFMMS_FXCCE_1372323383
22/10/2013	1030398220W_CRFMOL_FXCCE_1726545777
23/10/2013	1030398220W_CRFMOL_FXCCE_2113116549
24/10/2013	1030398220W_CRFMOL_FXCCE_0842063947
25/10/2013	1030398220W_CRFMOL_FXCCE_0842041681
28/10/2013	1030398220W_CRFMCS_FXCCE_0164096995
29/10/2013	1030398220W_CRFMOL_FXCCE_1726590811
30/10/2013	1030398220W_CRFMOL_FXCCE_1726885754
31/10/2013	1030398220W_CRFMOL_FXCCE_0207759846
1/11/2013	1030398220W_CRFMOL_FXCCE_1726742117
4/11/2013	1030398220W_CRFMOL_FXCCE_0842073445
5/11/2013	1030398220W_CRFMOL_FXCCE_1726629013
6/11/2013	1030398220W_CRFMOL_FXCCE_1726985602
7/11/2013	1030398220W_CRFMOL_FXCCE_1726654772
8/11/2013	1030398220W_CRFMCS_FXCCE_2094029653
11/11/2013	1030398220W_CRFMOL_FXCCE_0842041713
12/11/2013	1030398220W_CRFMOL_FXCCE_1926007014
13/11/2013	1030398220W_CRFMOL_FXCCE_2102027880
14/11/2013	1030398220W_CRFMOL_FXCCE_0842410884
15/11/2013	1030398220W_CRFMOL_FXCCE_1372445627
18/11/2013	1030398220W_CRFMOL_FXCCE_0842266795
19/11/2013	1030398220W_CRFMOL_FXCCE_1372205352
20/11/2013	1030398220W_CRFMOL_FXCCE_0502001107
21/11/2013	1030398220W_CRFMOL_FXCCE_1726730815
22/11/2013	1030398220W_CRFMOL_FXCCE_1726738714
25/11/2013	1030398220W_CRFMOL_FXCCE_1726749095
26/11/2013	1030398220W_CRFMMS_FXCCE_0242006090
27/11/2013	1030398220W_CRFMOL_FXCCE_0842419050
28/11/2013	1030398220W_CRFMOL_FXCCE_1726999154
29/11/2013	1030398220W_CRFMOL_FXCCE_0842143153
2/12/2013	1030398220W_CRFMOL_FXCCE_1726795730
3/12/2013	1030398220W_CRFMOL_FXCCE_1726839271
4/12/2013	1030398220W_CRFMOL_FXCCE_1726813487
5/12/2013	1030398220W_CRFMOL_FXCCE_0152008351
6/12/2013	1030398220W_CRFMOL_FXCCE_0842418879
9/12/2013	1030398220W_CRFMOL_FXCCE_0842077476
10/12/2013	1030398220W_CRFMOL_FXCCE_1726006137
11/12/2013	1030398220W_CRFMCS_FXCCE_0862000261
12/12/2013	1030398220W_CRFMOL_FXCCE_0207783314
13/12/2013	1030398220W_CRFMOL_FXCCE_0842237311
16/12/2013	1030398220W_CRFMOL_FXCCE_0842135191
17/12/2013	1030398220W_CRFMOL_FXCCE_1726893647
18/12/2013	1030398220W_CRFMOL_FXCCE_0842034308

Trade Date	Trade Unique Transaction Identifier
19/12/2013	1030398220W_CRFMOL_FXCCE_1726912324
20/12/2013	1030398220W_CRFMCS_FXCCE_0892007434
23/12/2013	1030398220W_CRFMOL_FXCCE_1726966985
24/12/2013	1030398220W_CRFIIS_FXCCE_2006003236
27/12/2013	1030398220W_CRFMOL_FXCCE_0207791447
30/12/2013	1030398220W_CRFMOL_FXCCE_0902012646
31/12/2013	1030398220W_CRFMOL_FXCCE_0842265291
2/01/2014	1030398220W_CRFMOL_FXCCE_0842349129
3/01/2014	1030398220W_CRFMOL_FXCCE_0842555806
6/01/2014	1030398220W_CRFMOL_FXCCE_0842283896
7/01/2014	1030398220W_CRFMOL_FXCCE_0842600353
8/01/2014	1030398220W_CRFMOL_FXCCE_0842413354
9/01/2014	1030398220W_CRFMOL_FXCCE_0842257601
10/01/2014	1030398220W_CRFMOL_FXCCE_0842000428
13/01/2014	1030398220W_CRFMMS_FXCCE_0842596224
14/01/2014	1030398220W_CRFMOL_FXCCE_0842453386
15/01/2014	1030398220W_CRFMOL_FXCCE_0842680512
16/01/2014	1030398220W_CRFMOL_FXCCE_0842256523
17/01/2014	1030398220W_CRFMOL_FXCCE_1926017494
20/01/2014	1030398220W_CRFMOL_FXCCE_0352017235
21/01/2014	1030398220W_CRFMOL_FXCCE_0842961739
22/01/2014	1030398220W_CRFMOL_FXCCE_0842126803
23/01/2014	1030398220W_CRFMMS_FXCCE_0342008100
24/01/2014	1030398220W_CRFMMS_FXCCE_0732018269
28/01/2014	1030398220W_CRFMOL_FXCCE_1966015297
29/01/2014	1030398220W_CRFMOL_FXCCE_0842561503
30/01/2014	1030398220W_CRFMOL_FXCCE_1372340585
31/01/2014	1030398220W_CRFMCS_FXCCE_1372087728
3/02/2014	1030398220W_CRFMOL_FXCCE_0842510642
4/02/2014	1030398220W_CRFMCS_FXCCE_0892001191
5/02/2014	1030398220W_CRFMOL_FXCCE_1372386570
6/02/2014	1030398220W_CRFMOL_FXCCE_0842192071
7/02/2014	1030398220W_CRFMCS_FXCCE_0842574457
10/02/2014	1030398220W_CRFMCS_FXCCE_0412012089
11/02/2014	1030398220W_CRFMOL_FXCCE_0842398127
12/02/2014	1030398220W_CRFMOL_FXCCE_0842182844
13/02/2014	1030398220W_CRFMOL_FXCCE_0772004513
14/02/2014	1030398220W_CRFMCS_FXCCE_0892003070
17/02/2014	1030398220W_CRFMOL_FXCCE_0952001160
18/02/2014	1030398220W_CRFMOL_FXCCE_0842549976
19/02/2014	1030398220W_CRFMOL_FXCCE_0732011158
20/02/2014	1030398220W_CRFMOL_FXCCE_0622018428
21/02/2014	1030398220W_CRFMOL_FXCCE_0842964928
24/02/2014	1030398220W_CRFMOL_FXCCE_0207818422
25/02/2014	1030398220W_CRFMOL_FXCCE_1372086028
26/02/2014	1030398220W_CRFMOL_FXCCE_0842263899
27/02/2014	1030398220W_CRFMOL_FXCCE_0842768748
28/02/2014	1030398220W_CRFMOL_FXCCE_0842455888
3/03/2014	1030398220W_CRFMOL_FXCCE_0842295886
4/03/2014	1030398220W_CRFMOL_FXCCE_1782413482
5/03/2014	1030398220W_CRFMOL_FXCCE_0042013739
6/03/2014	1030398220W_CRFMOL_FXCCE_0842925944
7/03/2014	1030398220W_CRFMDS_FXCCE_0842849700
10/03/2014	1030398220W_CRFMOL_FXCCE_0842820060
11/03/2014	1030398220W_CRFMOL_FXCCE_0842343710
12/03/2014	1030398220W_CRFMOL_FXCCE_0622012259
13/03/2014	1030398220W_CRFMOL_FXCCE_0842361558

DTR01/17, Tuesday, 27 June 2017

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Trade Date	Trade Unique Transaction Identifier
14/03/2014	1030398220W_CRFMMS_FXCCE_0642006616
17/03/2014	1030398220W_CRFMOL_FXCCE_1372388726
18/03/2014	1030398220W_CRFMOL_FXCCE_0842972363
19/03/2014	1030398220W_CRFMOL_FXCCE_0842853809
20/03/2014	1030398220W_CRFMOL_FXCCE_0842034776
21/03/2014	1030398220W_CRFMOL_FXCCE_0842415076
24/03/2014	1030398220W_CRFMOL_FXCCE_0632022903
25/03/2014	1030398220W_CRFMMS_FXCCE_0842540426
26/03/2014	1030398220W_CRFMDS_FXCCE_1372210397
27/03/2014	1030398220W_CRFMOL_FXCCE_0842443356
28/03/2014	1030398220W_CRFMOL_FXCCE_1372306821
31/03/2014	1030398220W_CRFMOL_FXCCE_0632026943
1/04/2014	1030398220W_CRFMOL_FXCCE_0662010819
2/04/2014	1030398220W_CRFMDS_FXCCE_0872004890
3/04/2014	1030398220W_CRFMCS_FXCCE_0152031480
4/04/2014	1030398220W_CRFMOL_FXCCE_1372580662
7/04/2014	1030398220W_CRFMMS_FXCCE_0832011174
8/04/2014	1030398220W_CRFMOL_FXCCE_0842659368
9/04/2014	1030398220W_CRFMOL_FXCCE_0842648690
10/04/2014	1030398220W_CRFMOL_FXCCE_0842788564
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15/04/2014	1030398220W_CRFMOL_FXCCE_0842816454
16/04/2014	1030398220W_CRFMDS_FXCCE_0872006707
17/04/2014	1030398220W_CRFMOL_FXCCE_1372046227
22/04/2014	1030398220W_CRFMOL_FXCCE_0842594764
23/04/2014	1030398220W_CRFMOL_FXCCE_1372204178
24/04/2014	1030398220W_CRFMOL_FXCCE_1372389948
28/04/2014	1030398220W_CRFMMS_FXCCE_0842954866
29/04/2014	1030398220W_CRFMMS_FXCCE_0662013413
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2/05/2014	1030398220W_CRFMMS_FXCCE_0662013560
5/05/2014	1030398220W_CRFMOL_FXCCE_1372304551
6/05/2014	1030398220W_CRFMCS_FXCCE_1372247190
7/05/2014	1030398220W_CRFMOL_FXCCE_0402009708
8/05/2014	1030398220W_CRFMOL_FXCCE_1926033967
9/05/2014	1030398220W_CRFMOL_FXCCE_0842715620
12/05/2014	1030398220W_CRFMOL_FXCCE_0842966590
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22/05/2014	1030398220W_CRFMOL_FXCCE_1372088187
23/05/2014	1030398220W_CRFMOL_FXCCE_0207853644
26/05/2014	1030398220W_CRFMOL_FXCCE_0842810672
27/05/2014	1030398220W_CRFIMS_FXCCE_0842999275
28/05/2014	1030398220W_CRFMOL_FXCCE_0842939295
29/05/2014	1030398220W_CRFMOL_FXCCE_1372219693
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2/06/2014	1030398220W_CRFMOL_FXCCE_2136034375
3/06/2014	1030398220W_CRFMDS_FXCCE_0662017778
4/06/2014	1030398220W_CRFMOL_FXCCE_0842873992
5/06/2014	1030398220W_CRFMOL_FXCCE_1372437347

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6/06/2014	1030398220W_CRFMOL_FXCCE_1372223768
9/06/2014	1030398220W_CRFMOL_FXCCE_1372282981
10/06/2014	1030398220W_CRFMCS_FXCCE_1782473539
11/06/2014	1030398220W_CRFMOL_FXCCE_1372288999
12/06/2014	1030398220W_CRFMOL_FXCCE_1372350955
13/06/2014	1030398220W_CRFMOL_FXCCE_1372436373
16/06/2014	1030398220W_CRFMOL_FXCCE_2102035123
17/06/2014	1030398220W_CRFMOL_FXCCE_1372327770
18/06/2014	1030398220W_CRFMOL_FXCCE_0502018543
19/06/2014	1030398220W_CRFMOL_FXCCE_0502019034
20/06/2014	1030398220W_CRFMOL_FXCCE_1372089970
23/06/2014	1030398220W_CRFMOL_FXCCE_0842984274
24/06/2014	1030398220W_CRFMOL_FXCCE_0842995938
25/06/2014	1030398220W_CRFMOL_FXCCE_1372488382
26/06/2014	1030398220W_CRFMOL_FXCCE_0312006892
27/06/2014	1030398220W_CRFMCS_FXCCE_0162053553
30/06/2014	1030398220W_CRFMOL_FXCCE_0042023241
1/07/2014	1030398220W_CRFMOL_FXCCE_1372042908
2/07/2014	1030398220W_CRFMOL_FXCCE_1372570413
3/07/2014	1030398220W_CRFMMS_FXCCE_1916027242
4/07/2014	1030398220W_CRFMOL_FXCCE_0762018787
7/07/2014	1030398220W_CRFMOL_FXCCE_0207866326
8/07/2014	1030398220W_CRFMCS_FXCCE_2136028618
9/07/2014	1030398220W_CRFMOL_FXCCE_0122020055
10/07/2014	1030398220W_CRFMOL_FXCCE_1372097267
11/07/2014	1030398220W_CRFMOL_FXCCE_0902014294
14/07/2014	1030398220W_CRFMOL_FXCCE_0042024798
15/07/2014	1030398220W_CRFMCS_FXCCE_0132012526
16/07/2014	1030398220W_CRFMOL_FXCCE_0132012645
17/07/2014	1030398220W_CRFMOL_FXCCE_1966032958
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4/08/2014	1030398220W_CRFMCS_FXCCE_1372385734
5/08/2014	1030398220W_CRFMOL_FXCCE_1372258367
6/08/2014	1030398220W_CRFMOL_FXCCE_0042027237
7/08/2014	1030398220W_CRFMOL_FXCCE_1372022560
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13/08/2014	1030398220W_CRFMOL_FXCCE_1372476811
14/08/2014	1030398220W_CRFMOL_FXCCE_0122022696
15/08/2014	1030398220W_CRFMOL_FXCCE_0622032105
18/08/2014	1030398220W_CRFMOL_FXCCE_1372536490
19/08/2014	1030398220W_CRFMOL_FXCCE_0122023135
20/08/2014	1030398220W_CRFMOL_FXCCE_0042030786
21/08/2014	1030398220W_CRFMOL_FXCCE_0166251570
22/08/2014	1030398220W_CRFMOL_FXCCE_1372531736
25/08/2014	1030398220W_CRFMOL_FXCCE_1782752549

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26/08/2014	1030398220W_CRFMOL_FXCCE_0902022119
27/08/2014	1030398220W_CRFMOL_FXCCE_0152036896
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29/08/2014	1030398220W_CRFMOL_FXCCE_1372422275
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2/09/2014	1030398220W_CRFMOL_FXCCE_1372035976
3/09/2014	1030398220W_CRFMOL_FXCCE_0042029305
4/09/2014	1030398220W_CRFMOL_FXCCE_1782577314
5/09/2014	1030398220W_CRFMOL_FXCCE_1782731104
8/09/2014	1030398220W_CRFMOL_FXCCE_0152048493
9/09/2014	1030398220W_CRFMOL_FXCCE_0042029882
10/09/2014	1030398220W_CRFMOL_FXCCE_0312123040
11/09/2014	1030398220W_CRFMOL_FXCCE_0312126326
12/09/2014	1030398220W_CRFMCS_FXCCE_0772018322
15/09/2014	1030398220W_CRFMOL_FXCCE_1782438832
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17/09/2014	1030398220W_CRFMOL_FXCCE_1372539084
18/09/2014	1030398220W_CRFMOL_FXCCE_1372044214
19/09/2014	1030398220W_CRFMOL_FXCCE_1372565195
22/09/2014	1030398220W_CRFMOL_FXCCE_0222020989
23/09/2014	1030398220W_CRFMOL_FXCCE_0642019923
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25/09/2014	1030398220W_CRFMOL_FXCCE_0622000598
26/09/2014	1030398220W_CRFMOL_FXCCE_0312020509
29/09/2014	1030398220W_CRFMOL_FXCCE_1372050170
30/09/2014	1030398220W_CRFMOL_FXCCE_0132015353
1/10/2014	1030398220W_CRFMOL_FXCCE_0312021156
2/10/2014	1030398220W_CRFMOL_FXCCE_1782491456
3/10/2014	1030398220W_CRFMOL_FXCCE_1372053336
6/10/2014	1030398220W_CRFMOL_FXCCE_1372053499
7/10/2014	1030398220W_CRFMOL_FXCCE_1782627220
8/10/2014	1030398220W_CRFMMS_FXCCE_1122000602
9/10/2014	1030398220W_CRFMOL_FXCCE_0312022373
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17/10/2014	1030398220W_CRFMOL_FXCCE_1372060063
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22/10/2014	1030398220W_CRFMOL_FXCCE_1372062172
23/10/2014	1030398220W_CRFMOL_FXCCE_0312024477
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3/11/2014	1030398220W_CRFMOL_FXCCE_1372068032
4/11/2014	1030398220W_CRFMOL_FXCCE_1372068792
5/11/2014	1030398220W_CRFMOL_FXCCE_1782568007
6/11/2014	1030398220W_CRFMOL_FXCCE_0122035576
7/11/2014	1030398220W_CRFMOL_FXCCE_1372071136
10/11/2014	1030398220W_CRFMOL_FXCCE_1782621256
11/11/2014	1030398220W_CRFMOL_FXCCE_1782516717
12/11/2014	1030398220W_CRFMOL_FXCCE_1782552266

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13/11/2014	1030398220W_CRFMOL_FXCCE_0312027836
14/11/2014	1030398220W_CRFMOL_FXCCE_1372074598
17/11/2014	1030398220W_CRFMOL_FXCCE_1782454022
18/11/2014	1030398220W_CRFMOL_FXCCE_1372076242
19/11/2014	1030398220W_CRFMOL_FXCCE_0432000769
20/11/2014	1030398220W_CRFMMS_FXCCE_1782584702
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24/11/2014	1030398220W_CRFMOL_FXCCE_1782413155
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3/12/2014	1030398220W_CRFMOL_FXCCE_1782447870
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5/12/2014	1030398220W_CRFMOL_FXCCE_1782836200
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9/12/2014	1030398220W_CRFMOL_FXCCE_1782581086
10/12/2014	1030398220W_CRFMAS_FXCCE_0762000852
11/12/2014	1030398220W_CRFMOL_FXCCE_1782666013
12/12/2014	1030398220W_CRFMOL_FXCCE_1782702522
15/12/2014	1030398220W_CRFMCS_FXCCE_1782471926
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23/12/2014	1030398220W_CRFMOL_FXCCE_1782017970
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31/12/2014	1030398220W_CRFMOL_FXCCE_1782019456
2/01/2015	1030398220W_CRFMOL_FXCCE_1782019786
5/01/2015	1030398220W_CRFMOL_FXCCE_1926000618
6/01/2015	1030398220W_CRFMOL_FXCCE_0166022449
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13/01/2015	1030398220W_CRFMOL_FXCCE_1942003676
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22/01/2015	1030398220W_CRFMOL_FXCCE_1902008496
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27/01/2015	1030398220W_CRFMOL_FXCCE_0166270322
28/01/2015	1030398220W_CRFMOL_FXCCE_1782762154
29/01/2015	1030398220W_CRFMOL_FXCCE_1782815633
30/01/2015	1030398220W_CRFMOL_FXCCE_0412027476
2/02/2015	1030398220W_CRFMOL_FXCCE_2002000009
3/02/2015	1030398220W_CRFMOL_FXCCE_2012000132
4/02/2015	1030398220W_CRFMOL_FXCCE_0312299485
5/02/2015	1030398220W_CRFMCS_FXCCE_0152045951

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6/02/2015	1030398220W_CRFMOL_FXCCE_1152009836
9/02/2015	1030398220W_CRFMOL_FXCCE_1926062736
10/02/2015	1030398220W_CRFMOL_FXCCE_1782794415
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12/02/2015	1030398220W_CRFMOL_FXCCE_0042041640
13/02/2015	1030398220W_CRFMOL_FXCCE_1782743830
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6/03/2015	1030398220W_CRFMOL_FXCCE_1782904502
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16/04/2015	1030398220W_CRFMOL_FXCCE_1418031506
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23/04/2015	1030398220W_CRFMOL_FXCCE_0122040490
24/04/2015	1030398220W_CRFMOL_FXCCE_0166183434
28/04/2015	1030398220W_CRFMOL_FXCCE_0892033305
29/04/2015	1030398220W_CRFMOL_FXCCE_0166120905