

**CIRCULAR 067-25**May 29<sup>th</sup>, 2025**SELF-CERTIFICATION****AMENDMENTS TO THE REPORTING OF EXCHANGE OF FUTURES FOR RELATED PRODUCT TRANSACTIONS AND ORDERS**

On February 25, 2025, the President and Chief Executive Officer of Bourse de Montréal Inc. (the “**Bourse**”) approved amendments to the Rules of the Bourse on reporting Exchange of Futures for related Product Transactions and Orders.

These amendments were self-certified in accordance with the self-certification process as established in the *Derivatives Act* (CQLR, Chapter I-14.01).

These amendments attached herewith will become effective on **June 2<sup>nd</sup>, 2025**, after market close. Please note that the revised articles will also be available on the Bourse’s website ([www.m-x.ca](http://www.m-x.ca)).

The amendments covered by this circular were the subject of a request for comments published by the Bourse on February 27, 2025 (see Circular [028-25](#)). Further to the publication of this circular, the Bourse received comments. A summary of the comments received as well as responses from the Bourse to these comments is attached hereto.

For additional information, please contact Maxime Rousseau-Turenne, Legal Counsel, by email at [maxime.rousseauturenne@tmx.com](mailto:maxime.rousseauturenne@tmx.com).

Maxime Rousseau-Turenne  
Legal Counsel  
Bourse de Montréal Inc.

# AMENDMENTS TO THE RULES OF THE BOURSE

## BLACKLINE VERSION

### Article 6.110 Orders

[...]

(b) The types of which entered into the Electronic Trading System are as follows:

[...]

(xi) EFRP order. An EFRP order is an order that can only be matched with an opposite EFRP order that meet the following conditions:

(1) The identification code of the Approved Participant on the initial order matches the identification code of the same Approved Participant on the opposing order;

(2) Both orders are entered with the same price and for the same quantity of the same product;

(3) Both orders must be entered during the same Business Day.

(4) The Transaction resulting from the orders complies with the requirements applicable to EFRP Transactions under Article 6.208.

[...]

### Article 6.208 Exchange of Futures for Related Products

(a) EFRP Transactions in general. Exchanges of Futures for Related Products ("EFRP") Transactions involving Futures Contracts listed and traded on the Bourse are permitted if such Transactions are executed in accordance with the requirements of this Article. An EFRP Transaction is composed of the privately negotiated execution (which includes, for purposes of this Article, a Transaction resulting from the matching of two EFRP orders as described in subparagraph 6.110(b)(xi)) of a Bourse Futures Contract and the opposite, simultaneous execution of an approximately equivalent quantity or value of cash product, by-product, related product, or Over-The-Counter ("OTC") Derivative Instrument underlying the Futures Contract.

[...]

(d) Reporting EFRP Transactions. Approved Participants for both the seller and buyer must report within one hour upon determination of all the relevant terms of the Transaction to the Market Operations Department on the Special Terms Transaction Reporting Form available at <http://sttrf-frots.m-x.ca/>, or by any other means made available by an external user accepted by the Bourse (as published on the website of the Bourse), each EFRP Transaction executed during the trading hours of the applicable Futures Contract. For those EFRP Transactions executed after such trading hours, the Transaction shall be reported to the Bourse no later than 10:00 a.m. (Montréal time) on the Trading Day following execution. The Market Operations Department will validate the details of the report before accepting the Transaction (which is not a confirmation by the Bourse that the EFRP Transaction has been effected in accordance with

this Article).

## CLEAN VERSION

### Article 6.110 Orders

[...]

(b) The types of which entered into the Electronic Trading System are as follows:

[...]

(xi) EFRP order. An EFRP order is an order that can only be matched with an opposite EFRP order that meet the following conditions:

- (1) The identification code of the Approved Participant on the initial order matches the identification code of the same Approved Participant on the opposing order;
- (2) Both orders are entered with the same price and for the same quantity of the same product;
- (3) Both orders must be entered during the same Business Day.
- (4) The Transaction resulting from the orders complies with the requirements applicable to EFRP Transactions under Article 6.208.

[...]

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(d) Reporting EFRP Transactions. Approved Participants for both the seller and buyer must report within one hour upon determination of all the relevant terms of the Transaction to the Market Operations Department on the Special Terms Transaction Reporting Form available at <http://sttrf-frots.m-x.ca/>, or by any other means made available by an external user accepted by the Bourse (as published on the website of the Bourse), each EFRP Transaction executed during the trading hours of the applicable Futures Contract. For those EFRP Transactions executed after such trading hours, the Transaction shall be reported to the Bourse no later than 10:00 a.m. (Montréal time) on the Trading Day following execution. The Market Operations Department will validate the details of the report before accepting the Transaction (which is not a confirmation by the Bourse that the EFRP Transaction has been effected in accordance with

this Article).

**Circular 028-25 : AMENDMENTS TO THE REPORTING OF EXCHANGE OF FUTURES FOR RELATED PRODUCT TRANSACTIONS AND ORDERS**

**Comments received and responses from Bourse de Montréal Inc.**

No.	Comments	MX Responses
Received on March 14, 2025		
1.	<p>We appreciate the opportunity to provide comments to Bourse de Montréal Inc. (the “Bourse”) regarding the proposed amendments to the rules of the Bourse on reporting Exchange of Futures for related Product Transactions and Orders.</p> <p><u>Proposed Amendments</u></p> <p>As stated in the circular, the Bourse proposes to amend its rules to</p> <ol style="list-style-type: none"> <li>1. facilitate the introduction of additional reporting solutions that would allow external users accepted by the Bourse to submit the Futures leg of an Exchange of Futures for Related Products (EFRPs), specifically Exchange for Physicals (EFPs) trades, directly to the Bourse’s Trading System; and</li> <li>2. introduce a new order type for this purpose.</li> </ol> <p>The circular states:</p>	N/A

The Rules currently provide that the Special Terms Transaction Reporting Form (STTRF) is the only means by which Approved Participants can report EFRP transactions to the Bourse's Market Operations Department. The new order type would allow for the execution of the Futures leg of an EFRP, specifically EFPs, by means of two matching orders sent to the Trading System (footnote omitted).

#### Alternative Reporting Solutions

Currently, Approved Participants can only report the terms of an EFP to the Bourse's Market Operations Department, via the STTRF available on its website, while the Futures leg of the EFP must be entered manually by a Bourse Market Supervisor.

The Bourse proposes to make minor modifications in order to accommodate new reporting solution initiatives, namely one that would allow for the electronic submission of EFRPs directly to the Bourse's trading engine.

The organisations we represent do not oppose the proposal as it will not impact their ability to continue sending EFPs via the STTRF nor the ability of Market Supervisors of the Bourse to manually execute the Futures leg of an EFP.

Received on March 26, 2025

2.	General questions received verbally from a Clearing Member regarding clarifications of the proposed change.	General clarifications given based on the published documentation.
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