

Order Execution Policy

BitGo Europe ApS

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Contents

1. Introduction	3
2. Scope	3
3. Roles and responsibilities	3
4. Third parties	3
5. Order execution	4
6. Ongoing monitoring	4
7. Client communication	5
8. Prior consent	5
9. Order execution flow	5
10. Cancellation process	6
11. Order execution compliance	6
12. Misuse of information	6
13. Record keeping	7
Orders	7
Transactions	7
Reception and transmission of orders	7
Orders and transactions via an entity not subject to MiCA	8
Designation to identify natural persons	8
Person determining conditions for execution of a transaction	8
Identification of legal entity clients	9
Identification of crypto assets	9
Identification of the crypto asset service provider	9
14. Oversight	9
15. Review	10
Annex 1 – Details of orders to be kept	11
Annex 2 – details of transactions to be kept	20
Annex 3 – on chain data to be kept	28
Annex 4 - Legend for information to be provided to the competent authority	29



Order Execution Policy BitGo Europe ApS

1. Introduction

BitGo Europe ApS (hereinafter “**BitGo Europe**”) is a crypto asset custodian which is applying for authorisation with the Danish Financial Supervisory Authority to operate as a crypto asset firm under the Markets in Crypto Assets Regulation (“**MiCA**”).

BitGo Europe is a private limited company incorporated in Denmark on 3 September 2024 with registration number 45058239.

Article 78 of MiCA sets out requirements in relation to the execution of orders for crypto assets on behalf of clients. This includes that service providers shall take all necessary steps to obtain the best possible result for clients when executing orders, taking into account price, costs, speed, likelihood of execution and settlement, size, nature, conditions of custody of the crypto assets or any other consideration relevant to the execution of the order.

Article 80 of MiCA sets out requirements in relation to the service of reception and transmission of orders for crypto-assets on behalf of clients. This includes that service providers shall establish and implement arrangements for the prompt and proper transmission of client orders, shall not receive any remuneration or non-monetary benefit in return for routing orders received from clients to a particular execution venue, and shall not (nor allow its employees) misuse information relating to pending client orders.

BitGo Europe is committed to (i) executing client orders, and (ii) receiving and transmitting orders on behalf of clients (together “**client order services**”), in line with these principles. To do so BitGo Europe has established effective arrangements including an assessment of execution venues and ongoing monitoring. Clients are provided with, and consent to, BitGo Europe’s order execution policy and material changes are communicated to clients in advance.

This policy aims to mitigate the risk of disadvantaging clients when providing client order services, incurring reputational damage and breaching the requirements of Article 78 and/or Article 80 of MiCA. This policy is owned by [the CEO] and is reviewed at least annually or sooner if there are material changes to BitGo Europe’s business activities, its customers, execution venues or the wider crypto market.

2. Scope

This policy applies to all transactions executed by BitGo Europe.

3. Roles and responsibilities

Role	Responsibilities
BitGo Europe Managing Director	Review and approve the Order Execution policy and related processes, at least annually; Ensure processes and procedures align to the Order Execution policy Monitor alignment to the order execution process; Ensure compliance with regulatory requirements;
Operations Lead	Oversee day to day operational activity in line with Order Execution policy;

4. Third parties

The products and services of BitGo Europe are provided with the support and involvement of other entities within the BitGo Group. The roles of different group entities relevant to order execution are:



Order Execution Policy BitGo Europe ApS

- BitGo Europe: Execution of client orders with other relevant entities on a riskless principle basis. It shall also receive and transmit client orders to appropriate execution venues which are selected in compliance with this policy.
- BitGo Prime LLC will provide agency services for BitGo Europe to allow BitGo Europe to continue to trade with clients out of Denmark's usual business hours. It will also upon request, quote pricing from its own execution venues, to BitGo Europe.
- BitGo Hong Kong Ltd will provide agency services for BitGo Europe to allow BitGo Europe to continue to trade with clients out of Denmark's usual business hours. It will also upon request, quote pricing from its own execution venues, to BitGo Europe.
- BitGo Europe GmbH (BitGo Germany) will provide day-to-day operations and compliance services to support BitGo Europe's crypto-asset services.
- BitGo Inc will provide software services, IT support and make available third-party software on an arms length basis. BitGo, Inc. also licenses its proprietary software platform which allows BitGo Europe's users to create and use non-custodial ("hot") wallets.

5. Order Handling

Client orders are processed in a prompt, fair and expeditious manner. Orders from the same client are processed sequentially unless:

- (i) the characteristics of the client order or market condition render this impracticable; or
- (ii) interests of the client require otherwise and as instructed with the client.

Execution or transmission of client orders is carried out strictly in accordance with client instructions or best execution criteria (as described in Section 6 of this Policy) without the influence of any other internal or extraneous factors.

BitGo Europe may, upon a client's request, make enquiries into the market for indicative pricing purposes.

It is important to note that any indicative pricing confirmed to a client does not represent a commitment of any kind made by BitGo Europe to buy/sell cryptoassets at the given price and therefore no best execution duties are owed to the client at that point and time. If a client does proceed with instructing BitGo Europe to transmit or execute a transaction for any crypto assets for which it has sought indicative pricing, BitGo Europe will proceed to execute such a transaction on behalf of the client in accordance with the best execution procedures as set out in Section 6 of this Policy. The ultimate pricing achieved for the transaction may be different from the indicative prices conveyed at an earlier time due to market movements and other factors which impact pricing.

6. Order execution / reception and transmission of orders

When executing orders for crypto assets on behalf of clients or receiving and transmitting client orders, BitGo Europe will take all necessary steps to obtain the best possible result for clients taking into account factors of:

- price,



Order Execution Policy BitGo Europe ApS

- costs,
- speed,
- likelihood of execution,
- likelihood of settlement,
- size,
- nature,
- conditions of custody of the crypto-assets,
- any other consideration relevant to the execution of the order.

The only exception to this is where the client provides specific instructions for the execution of the order, or particular parts of the order. This includes but is not limited to specific instructions relating to price limits, timing and method of execution.

This policy provides for the prompt, fair and expeditious execution of client orders and prevents the misuse of information about client orders by any BitGo Europe employees.

7. Venue execution

BitGo Europe has determined that it is in the best interests of its clients to transmit client orders to, and to execute orders on behalf of clients with specific execution venues with access to global execution venues, including market makers that typically offer better prices than public exchanges.

As of the date of this Policy, we have appointed BitGo Hong Kong Limited and BitGo Prime, LLC to provide this service.

In determining the most appropriate execution venues we have considered the following:

1. Appointing BitGo Hong Kong Limited and BitGo Prime, LLC enables us to obtain the best possible results on a consistent basis when transmitting orders or executing orders on behalf of customers.
2. We expect that BitGo Hong Kong Limited and BitGo Prime, LLC will obtain results for our customers that are at least as good as the results we could reasonably expect from using an alternative execution venue or by executing the order ourselves.

BitGo Europe, BitGo Hong Kong Limited and BitGo Prime, LLC shall not receive any remuneration, discount or non-monetary benefit in return for executing on behalf of a client or for routing orders for crypto assets received from clients to a particular crypto-asset execution venue. The choice of execution venue and rationale shall be disclosed to the client in the Disclosure section of the Master Purchase Agreement that the client enters into with BitGo Europe.

BitGo Europe intends to appoint BitGo Singapore Pte. Ltd. on the basis of the Order Execution factors set out above, and that their appointments enable BitGo Europe to settle and execute trades during extended trading hours and therefore to be able to obtain best possible results on a consistent basis on behalf of customers. In the short-term BitGo Europe also intends to appoint BitGo MENA FZE provided that it is in the best interests of clients on the basis of Order Execution factors above.

BitGo Europe intends to back to back all of its OTC trades to group companies that have been set up for trading and due the volume of trades that such companies enter into, are expected to achieve better pricing than would be available to BitGo Europe independently.

As part of any execution venue selection process, BitGo Europe shall consider the above Order Execution factors as part of the selection criteria for any decision to appoint alternative or further execution venues.



Order Execution Policy BitGo Europe ApS

BitGo Europe assesses, on at least an annual basis, the effectiveness of order execution arrangements and the order execution policy and corrects any identified deficiencies. Initially, this assessment is based on expected performance of our liquidity providers based on available information. Thereafter, this assessment is supplemented by performance monitoring data.

The outcome of this assessment is compared with alternative execution venues to ensure customers are obtaining the best possible result for each relevant crypto asset.

8. Ongoing monitoring

BitGo Europe will assess the appropriateness of its execution venue(s) on an ongoing basis. This will include ongoing consideration of all factors detailed in the previous sections based on regular management information.

Any concerns identified as part of day to day trading activities carried out by BitGo Europe, e.g. higher charges than expected, lower levels of liquidity than expected, slower execution and settlement than expected, etc. will be immediately escalated to the BitGo Europe CEO who will consider and implement appropriate actions to resolve these issues.

BitGo Europe shall also review this Policy and related execution arrangements at least annually, and whenever a change occurs that may materially affect our ability to obtain the best possible result for clients, including any significant event that could materially impact parameters of best execution such as cost, speed, likelihood of execution, and any other material relevant consideration. In the event BitGo Europe identifies deficiencies in its order execution arrangements it will take immediate steps to resolve these by updating the Order Execution Policy and execution arrangements where such changes deliver a better result for clients.

Where such actions include significant changes to the Order Execution policy BitGo Europe will notify clients of this in line with the approach described in this policy.

9. Client communication

BitGo Europe will ensure clients are provided with relevant details of its Order Execution Policy when they are first onboarded. In addition, these details will always be available on BitGo Europe's website.

In the event of significant change to the Order Execution Policy clients will be provided with notification of the new policy in advance of the changes taking effect.

10. Prior consent

Before orders are executed on behalf of a client BitGo Europe will ensure they have provided explicit consent to the Order Execution Policy. All clients are required to review and consent to appropriate details of the Order Execution Policy as part of the onboarding process – if consent is not provided clients are not onboarded and they are not able to trade.

Where significant changes are made to the Order Execution Policy which requires client notification they will be required to consent to the updated policy. Until consent has been granted they will not be able to carry out any trades after the implementation date of the applicable changes.



11. Order execution flow

As per its usual business model, the majority of time, BitGo Europe will execute trades as riskless principal. When a client approaches BitGo Europe for an OTC voice trade, When a price is requested, the trader will look for a 'hedge' price from BitGo Hong Kong and BitGo Prime for the full amount. For example, if a client wants to buy 10 BTC, BitGo Europe will be asking for a price to buy 10 BTC from BitGo Hong Kong. Once this hedge price is provided by BitGo Hong Kong, the trade will add on discretionary trading margin and show the new price to the client. Once the client agrees the price with BitGo Europe, BitGo Europe will lock in the hedge with BitGo Hong Kong for the same traded amount. PnL captured is the difference in price between the client facing trade and the hedge trade.

Two resulting trades will be booked;

- 1) Client <> BitGo Europe (example price, client buys 10 BTC at USD92,900)
- 2) BitGo Europe <> BitGo Hong Kong (example price, BitGo buys 10 BTC at USD 92,800)

In both instances, BitGo Europe is trading on a principal basis. PnL captured by BitGo is $(92,900 - 92,800) \times 10$ BTC = USD 1,000

To ensure it adheres to the riskless trading policy, BitGo will run a **delta neutral book**, i.e. everything is hedged 1:1 with BitGo Hong Kong.

In the case where a client looks to trade a certain quote currency notional (e.g. looks to buy USD100,000 worth of BTC), the notional amount will be hedged and the PnL captured will be in the base currency asset (in this case BTC). Example;

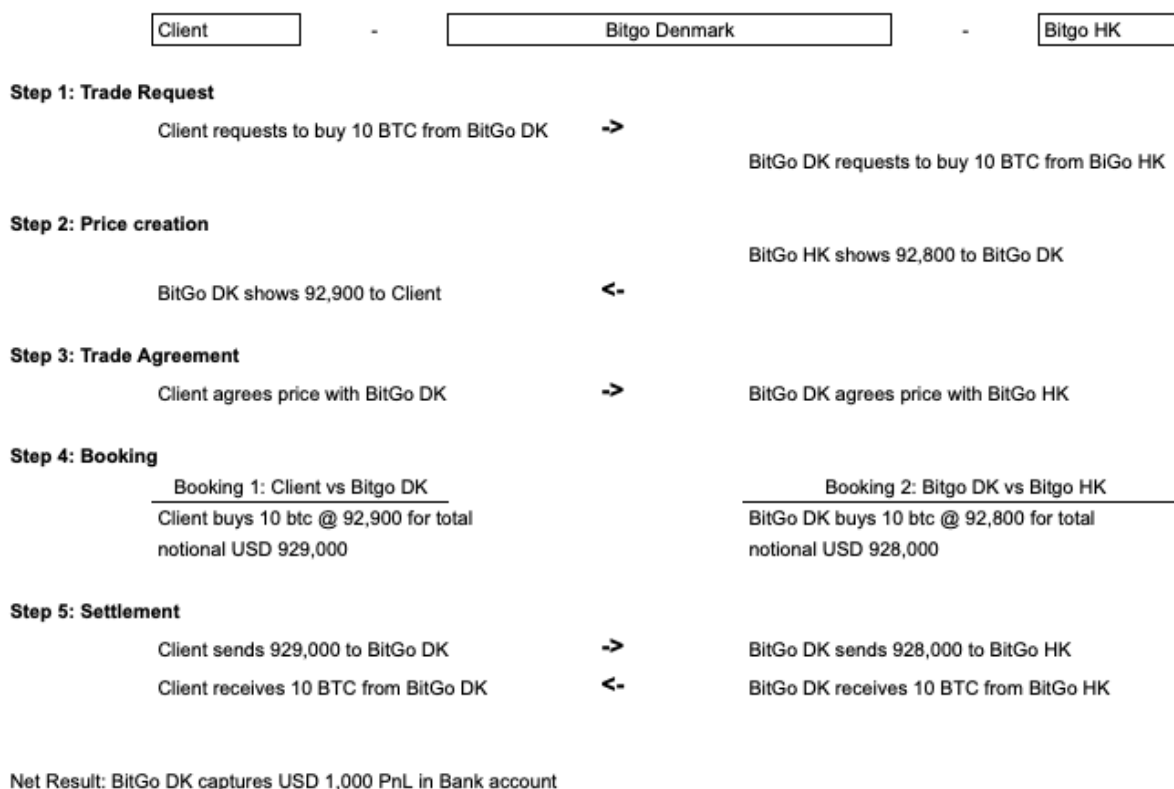
- Client buys USD100,000 worth of BTC at USD 95,000 per BTC. Total received is 1.05263158 BTC.
- BitGo hedges (buys) USD 100,000 worth of BTC at USD94,000 per BTC from BitGo HK. Total received is 1.06382979 BTC.

PnL from this trade is 0.01119821 BTC.

This type of PnL, where it comes in the form of a volatile digital asset, will be sold at the end of each trading day into USD and captured accordingly in the trading book.



Order Execution Policy BitGo Europe ApS



12. Cancellation process

BitGo Europe has a clear and transparent process for cancelling executed orders in exceptional circumstances. Where a claim is made, or it is otherwise identified, that an executed order is erroneous or executed under conditions which warrant cancellation this will be promptly reviewed by BitGo Europe's CEO to determine if cancellation is justified.

Details of any cancelled orders will be clearly and promptly disclosed to market participants. This will include disclosure of the cancellation, the details of the original order, the reason for the cancellation and any corrective actions taken. This disclosure will be in machine readable format.

13. Order execution compliance

At a client's request BitGo Europe will be able to demonstrate that their orders have been executed in accordance with the Order Execution Policy. BitGo Europe will also be able to provide such evidence of compliance to the Danish FSA at its request.

14. Misuse of information

BitGo Europe is committed to ensuring that its employees and staff shall not misuse information relating to pending client orders. As such, BitGo Europe has robust controls in place to prevent the misuse of information relating to pending orders. These controls include:

- Access controls and information barriers: to prevent unauthorised individuals having access to information about pending orders – the only individuals able to access this information are those where such access is required to carry out their day to day responsibilities;



Order Execution Policy BitGo Europe ApS

- Monitoring: surveillance of all orders received, transmitted and executed by BitGo Europe for market abuse monitoring;
- Personal account dealing process: ensures all BitGo Europe staff are aware of their responsibilities and monitors for potential abuse;
- Reporting and escalation: various routes are available internally and externally for staff to report wrongdoing.

Further details in relation to the above controls can be found in the Market Abuse Policy, Conflict of Interest Policy and Whistleblowing Policy.

15. Record keeping

For record keeping purposes “undertaking a transaction” means executing a transaction or transmitting an order. “Executing a transaction” means providing any of the following services or performing any of the following activities that result in a transaction:

- Reception and transmission of orders in relation to one or more crypto asset(s);
- Execution of orders on behalf of clients;
- Exchange of crypto assets for funds or for other crypto assets;
- Transfer of crypto assets to or from accounts;

All records will be maintained in a durable medium which allows prompt retrieval without undue delay. Further information on what information is recorded and the length of time the data is retained, can be found in the Data Retention Policy.

Records are held in a way which meets the following conditions:

- Each key stage of processing a service, activity, order or transaction is able to be reconstituted;
- Any corrections or amendments to records can be easily identified;
- Records cannot be otherwise manipulated or altered;
- Appropriate analysis of the records can be carried out using information and communication technology;
- Arrangements comply with the record keeping requirements regardless of the technology used;
- All other relevant legal requirements relating to records are met (e.g. GDPR).

Orders

For every order received from a client BitGo Europe will record and maintain in an easily accessible format, at the disposal of the Danish FSA, the details listed in Annex 1 and Annex 3.

Where information is requested by a competent authority BitGo Europe will provide that information as set out in the last column of the table in the annexes.

Transactions

Immediately after undertaking a transaction BitGo Europe will record and keep at the disposal of the Danish FSA the details set out in Annex 2 and Annex 3.

Where information is requested by a competent authority BitGo Europe will provide that information as set out in the last column of the table in the annexes.



Order Execution Policy BitGo Europe ApS

Reception and transmission of orders

Where receiving and transmitting an order to another crypto asset service provider (which does not constitute execution of a transaction) BitGo Europe will record the details in fields 1, 2, 10, 12, 14, 15, 16, 17, 19, 20, 21, 25 and 37 of Annex 1. Where the order transmitted was received from another crypto asset service provider the code provided for the purpose of the record shall be the code which identifies the prior transmitting crypto asset service provider.

Where the order is transmitted more than once the order details will be recorded in relation to the client of the first transmitting crypto asset service provided.

Where order information is aggregated for more than one client the required information will be recorded for each client.

Orders and transactions via an entity not subject to MiCA

Where BitGo Europe executes an order through a trading platform or service provider which is not subject to MiCA BitGo Europe will record the details of the order as if it was undertaken by BitGo Europe.

Where BitGo Europe transmit an order to a firm that is not subject to MiCA it will record the details as set out in Annex 1 and Annex 3, to the extent they are pertinent to the order and to the extent they are retrievable.

Designation to identify natural persons

A natural person will be identified in BitGo Europe's records using a designation resulting from the concatenation of the ISO 3166-1 alpha 2 (2 letter country code) of their nationality, followed by the national client identifier specified in Annex II of Delegated Regulation (EU) 2017/590. This will use the highest priority national client identifier that a person has regardless of whether that identifier is already known to BitGo Europe.

Where a natural person is a national of more than one EEA country the country code of the first nationality when sorted alphabetically by its ISO 3166-1 alpha-2 code and the identified of that nationality assigned in accordance with the highest priority identifier shall be used. Where a natural person has a non-EEA nationality the highest priority identifier in accordance with the field referring to "all other countries" in annex II of Delegated Regulation (EU) 2017/590 will be used.

Where a natural person has EEA and non-EEA nationality the country code of the EEA nationality and the highest priority identifier of that nationality assigned will be used.

Where the highest priority identifier is based on CONCAT the natural person will be identified using the concatenation of the following elements, in the following order:

- The date of birth of the person in the format YYYYMMDD;
- The first five characters of the first name;
- The first five characters of the surname;

This will exclude prefixes. First and surnames shorter than 5 characters will be appended by # to ensure all references contain five characters. All characters shall be in upper case with no apostrophes, accents, hyphens, punctuation marks or spaces.

Person determining conditions for execution of a transaction

Where a person (or computer algorithm) within BitGo Europe executes a transaction and determines which taking platform located outside of the EEA to access, which other crypto asset service provider to transmit orders to or any conditions related to the execution of a transaction, that person (or computer algorithm) shall be identified in Field 40 of Annex 2.



Order Execution Policy BitGo Europe ApS

Where a person within BitGo Europe takes decisions determining the execution of a transaction BitGo Europe will assign a designation for identifying that person in transaction records in line with the approach to designation to identify natural persons.

In the event a computer algorithm is used within BitGo Europe to take decisions determining the execution of a transaction it will be identified in Field 42 of Annex 2. In the event a person and computer algorithm are both involved in the execution of a transaction, or more than one person or algorithm are involved, BitGo Europe will record which person or computer algorithm is primarily responsible.

Identification of legal entity clients

Within relevant records legal entity clients will be identified using the legal entity identifier (“LEI”) provided by that client. BitGo Europe will not carry out services, activities, orders or transactions which trigger a record keeping obligation for a client who is eligible for a LEI before obtaining the LEI from the client.

BitGo Europe will record LEIs compliance with ISO 17442 and included in the Global LEI database.

Where a client does not have a LEI compliant with ISO 17442 BitGo Europe will obtain one for the client or use an identifier defined at Union level which meets the following characteristics:

- Unique;
- Neutral;
- Reliable;
- Open source;
- Scalable;
- Accessible;
- Available at a reasonable cost basis;
- Subject to an appropriate supervisory framework.

Identification of crypto assets

Records of the crypto asset that are the object of the recorded transaction by using a digital token identifier that is compliant with the ISO 24165 standard, or equivalent identifier defined at Union level which is:

- Unique;
- Neutral;
- Reliable;
- Open source;
- Scalable;
- Accessible;
- Available at a reasonable cost basis;
- Subject to an appropriate supervisory framework.

Identification of the crypto asset service provider

When BitGo Europe undertakes orders or transactions it shall ensure it is identified in the records with an LEI compliant with ISO 17442 and included in the Global LEI database.



Order Execution Policy BitGo Europe ApS

BitGo Europe will ensure that the reference data related to its LEI is renewed in accordance with the terms of any of the accredited Local Operating Units of the Global LEI System.

16. Oversight

Effective oversight is key to identifying, investigating and addressed improper trading activities, promoting compliance with regulations and safeguarding market integrity.

The AML team will review the following:

- PEP screening on an annual basis;
- Person/Business Watchlists on a daily basis;
- Business Adverse Media on an annual basis;
- The number of investigations that were closed with no action, by alert type;
- A summary of each investigation that was escalated for action to be taken, including a description of the action taken;
- A summary of the status of any open investigations.

Any instances of potential market abuse will be immediately escalated to the Compliance Lead.

17. Review

This policy is owned by the CEO and is reviewed, and approved, at least annually. The CEO will monitor, assess and review the effectiveness of this policy and remedy any deficiencies identified.

In the event of a material breach of this policy the CEO must be notified immediately who will assess the details and determine appropriate steps to remedy the issue.



3) Annex 1 – Details of orders to be kept

Field number	Field name	Field description	Details to be provided to competent authority
Section A – identification of the relevant parties			
1	Client identification code	Code used to identify the client of the crypto-assets service provider which submitted the order. Where the client is a legal entity, the LEI code of the client or the alternative identifier referred to in Article 14.3 shall be used. Where the client is not a legal entity, the {NATIONAL_ID} shall be used. In case of pending allocations, the flag PNAL shall be used. This field shall be 'NOAP' where the crypto-asset service provider has a direct interest to buy or sell.	{LEI} {NATIONAL_ID} {ALPHANUM-20} {PNAL} 'NOAP'
2	Investment decision within the CASP	Code used to identify the person or the algorithm within the crypto assets service provider who is taking the investment decision. Where a natural person within the crypto-asset service provider takes the investment decision the person who is responsible or has primary responsibility for the investment decision shall be identified with the {NATIONAL_ID} Where an algorithm automatically determining individual parameters of orders such as whether to initiate the order or its timing, price or quantity took the investment decision the field shall be populated with a code assigned according to Article 8. This field shall be left blank when the investment decision was not made by a person or algorithm within the crypto asset service provider.	{NATIONAL_ID} — Natural persons {ALPHANUM-50} — Algorithms
3	Execution within firm	Code used to identify the person or algorithm within the crypto-asset service provider determining the conditions for the execution of the transaction resulting from the order. Where a natural person determines the execution of the transaction, the person shall be identified by {NATIONAL_ID} Where an algorithm automatically determining individual parameters of orders such as whether to initiate the order or its timing, price or quantity is responsible for the execution of the transaction, this field shall be populated with a code assigned by the crypto asset service provider, in accordance with Article 10. Where more than one person or a combination of persons and algorithms are involved in the execution of the transaction, the crypto asset service provider shall determine the trader or algorithm primarily responsible and populate this field with the identity of that trader or algorithm	{NATIONAL_ID} — Natural persons {ALPHANUM-50} — Algorithms
Section B — Trading capacity and liquidity provision			



Order Execution Policy

BitGo Europe ApS

4	Trading capacity	Indicates whether the crypto-asset service provider undertaking the transaction is carrying out matched principal trading, as defined under Article 3(1), point 40 of Regulation (EU) 2023/1114 or exchange crypto-assets for funds as defined under Article 3(1), point 19 of Regulation (EU) 2023/1114. Where the order submission does not result from the crypto-asset service provider carrying out matched principal trading or exchanging crypto-assets for funds or other crypto-assets, the field shall indicate that the transaction was carried out under any other capacity.	‘DEAL’ — Exchange crypto-assets for funds or other crypto-assets ‘MTCH’ — Matched principal ‘AOTC’ — Any other capacity
Section C — Date and time			
5	Date and Time	The date and time for each event listed in Section [G] and [J].	{DATE_TIME_FORMAT}
Section D — Validity period and order restrictions			
6	Validity period	Good-For-Day: the order expires at the end of the trading day on which it was entered in the order book Good-Till-Cancelled: the order will remain active in the order book and be executable until it is actually cancelled. Good-Till-Time: the order expires at the latest at a pre-determined time within the current trading session. Good-Till-Date: the order expires at the end of a specified date. Good-Till-Specified Date and Time: the order expires at a specified date and time. Good After Time: the order is only active after a pre-determined time within the current trading session. Good After Date: the order is only active from the beginning of a pre-determined date Good After Specified Date and Time: the order is only active from a pre-determined time on a pre-determined date. Immediate-Or-Cancel: an order which is executed upon its entering into the order book (for the quantity that can be executed) and which does not remain in the order book for the remaining quantity (if any) that has not been executed. Fill-Or-Kill: an order which is executed upon its entering into the order book provided that it can be fully filled: in the event the order can only be partially executed, then it is automatically rejected and cannot therefore be executed. Other: any additional indications that are unique for specific business models, trading platforms or systems.	‘DAVY’ — Good-For-Day ‘GTCV’ — Good-TillCancelled ‘GTTV’ — Good-TillTime ‘GTDV’ — Good-TillDate ‘GTSV’ — Good-TillSpecified Date and Time ‘GATV’ — Good After Time ‘GADV’ — Good After Date ‘GASV’ — Good After Specified Date and Time ‘IOCV’ — Immediate-OrCancel ‘FOKV’ — Fill-Or-Kill or {ALPHANUM-4} character’ not already in use for the trading venue’s own classification.
7	Order restriction	Good For Closing Price Crossing Session: where an order qualifies for the closing price crossing session. Valid For Auction: the order is only active and can only be executed at auction phases (which can be pre-defined by the CASP client who submitted the order, e.g. opening and/closing auctions and/or intraday auction).	‘SESR’ — Good For Closing Price Crossing Session VFAR’ — Valid For Auction



Order Execution Policy

BitGo Europe ApS

		Valid For Continuous Trading only: the order is only active during continuous trading. Other: any additional indications that are unique for specific business models, trading platforms or systems.	‘VFCR’ — Valid For Continuous Trading only {ALPHANUM-4} character’ not already in use for the trading venue’s own classification. This field shall be populated with multiple flags separated by a comma where more than one flag is applicable
8	Validity period and time	This field refers to the time stamp reflecting the time on which the order becomes active or it is ultimately removed from the order book: Good for day: the date of entry with the timestamp immediately prior to midnight Good till time: the date of entry and the time to that specified in the order Good till date: will be the specified date of expiry with the timestamp immediately prior to midnight Good till specified date and time: the specified date and time of expiry Good after time: the date of entry and the specified time at which the order becomes active Good after date: the specified date with the timestamp immediately after midnight Good after specified date and time: the specified date and time at which the order becomes active Good till Cancel: the ultimate date and time the order is automatically removed by market operations Other: timestamp for any additional validity type.	{DATE_TIME_FORMAT}
Section E — Identification of the order			
9	Segment MIC code	Identification of the trading platform for crypto-asset where the order was submitted. If the trading platform for crypto-asset uses segment MICs then the segment MIC shall be used. If the trading platform for crypto-asset does not use segment MICs then the operating MIC shall be used. This field shall only be populated for orders to be executed on a trading platform for cryptoasset	{MIC}
10	Crypto-asset identification code	Unique and unambiguous identifier of the crypto-asset	{DTI} {ALPHANUM-20}



Order Execution Policy

BitGo Europe ApS

11	Crypto-asset classification	Taxonomy used to classify the crypto-asset. or A complete and accurate CFI code shall be provided when available.	ART EMT OT {CFI_CODE}
12	Order identification code	An alphanumerical code assigned by the operator of the trading platform for crypto-assets to the individual order.	{ALPHANUM-50}
Section F — Events affecting the order			
13	New order, order cancellation	New order: submission of a new order to the CASP operating the trading platform for crypto-assets. Cancelled at the initiative of the client of the CASP: where the client decides upon its own initiative to cancel the order it has previously entered.	‘NEWO’ — New order ‘CAME’ — Cancelled at the initiative of the client of the CASP
Section G — Type of order			
14	Order type	Identifies the type of order submitted to the trading platform for crypto-asset as per the trading platform for crypto-asset specifications.	{ALPHANUM-50}
15	Order type classification	Classification of the order according to two generic order types. LIMIT order: in the cases where the order is tradable and STOP order: in the cases where the order becomes tradable only upon the realisation of a pre-determined price event.	The letters ‘LMTO’ for limit or the letters ‘STOP’ for stop.
Section H — Prices			
16	Limit price	The maximum price at which a buy order can trade or the minimum price at which a sell order can trade. The spread price for a strategy order. It can be negative or positive. This field shall be ‘NOAP’ in case of orders that do not have a limit price or in case of unpriced orders. Where price is reported in monetary terms, it shall be provided in the major currency unit. If the crypto-asset is traded based on a currency pair the price shall express the quantity of the quote currency for one unit of the base currency. If the price is expressed in sub-components of that crypto-asset, it shall be nonetheless recorded in decimal notation of the price expressed in units of that crypto-asset.	{DECIMAL-18/13} in case the price is expressed as monetary value. {DECIMAL-11/10} in case the price is expressed as a percentage or yield. {DECIMAL-18/17} in case the price is expressed as basis points ‘NOAP’
17	Additional limit Price	Any other limit price which may apply to the order. This field shall be left ‘NOAP’ if not relevant. Where price is reported in monetary terms, it shall be provided in the major currency unit. If the crypto-asset is traded based on a currency pair the price shall express the quantity of the quote currency for one unit of the base currency. If the price is expressed in sub-components of that crypto-asset, it shall be nonetheless recorded in decimal notation of the price expressed in units of that crypto-asset.	{DECIMAL-18/13} where the price is expressed as a monetary value. {DECIMAL-11/10} where the price is expressed as a percentage or yield. {DECIMAL-18/17} in



Order Execution Policy

BitGo Europe ApS

			case the price is expressed as basis points 'NOAP'
18	Stop price	The price that must be reached for the order to become `active. For stop orders triggered by events independent of the price of the crypto-asset, this field shall be populated with a stop price equal to zero. This field shall be 'NOAP' if not relevant. Where price is reported in monetary terms, it shall be provided in the major currency unit. If the crypto-asset is traded based on a currency pair the price shall express the quantity of the quote currency for one unit of the base currency. If the price is expressed in sub-components of that crypto-asset, it shall be nonetheless recorded in decimal notation of the price expressed in units of that crypto-asset.	{DECIMAL-18/13} where the price is expressed as a monetary value. {DECIMAL-11/10 where the price is expressed as a percentage or yield. {DECIMAL-18/17} in case the price is expressed as basis points 'NOAP'
19	Pegged limit price	The maximum price at which a pegged order to buy can trade or the minimum price at which a pegged order to sell can trade. This field shall be 'NOAP' if not relevant. Where price is reported in monetary terms, it shall be provided in the major currency unit. If the crypto-asset is traded based on a currency pair the price shall express the quantity of the quote currency for one unit of the base currency. If the price is expressed in sub-components of that crypto-asset, it shall be nonetheless recorded in decimal notation of the price expressed in units of that crypto-asset.	{DECIMAL-18/13} where the price is expressed as a monetary value. {DECIMAL-11/10 where the price is expressed as a percentage or yield. {DECIMAL-18/17} in case the price is expressed as basis points 'NOAP'
20	Transaction price	Traded price of the transaction excluding, where applicable, commission, other fees and accrued interest. Where price recorded in monetary terms, it shall be provided in the major currency unit. Where price is not applicable the field shall be populated with the value 'NOAP'. If the crypto-asset is traded based on a currency pair the price shall express the quantity of the quote currency for one unit of the base currency.	{DECIMAL-18/13} where the price is expressed as a monetary value. 'NOAP'
21	Price currency	Currency in which the trading price for the crypto-asset related to the order is expressed (applicable where the price is expressed as monetary value). Where the crypto-asset is traded in electronic money/e-money token, the Digital Token Identifier or the alternative identifier referred to in Article 15 shall be used.	{CURRENCYCODE_3} {DTI} {ALPHANUM-20} {CURRENCYCODE_3} should be used for fiat



Order Execution Policy

BitGo Europe ApS

		Where price of the crypto-asset is expressed in monetary terms and it is expressed in a currency pair, the currency pair in which the price for the crypto-asset related to the order is expressed shall be reported. The first currency code shall be that of the base currency and the second currency code shall be that of the quote currency. The quote currency determines the price of one unit of the base currency. The ISO currency code and the DTI short name as registered according to the ISO 24165-2 data elements for registration of the DTI or alternative identifier shall be used to represent the fiat currency and the crypto asset respectively in the currency pair.	currencies in a currency pair {DTI_SHORT_NAME} should be used for crypto assets in a currency pair 'NOAP'
22	Price notation	Indicates whether the price is expressed in monetary value, in percentage, in yield or in basis points.	'MONE' — Monetary value 'PERC' — Percentage 'YIEL' — Yield 'BAPO' — Basis points
Section I — Order instructions			
23	Buy-sell indicator	To show if the order is to buy or sell.	'BUYI' — buy 'SELL' — sell
24	Order status	To identify orders that are active/inactive/suspended: Active — non-quote orders that are tradable. Inactive — non-quote orders that are not tradable.	'ACTI' - active or 'INAC' - inactive
25	Quantity notation	Indicates whether the quantity reported is expressed in number of units, as a nominal value or as a monetary value, or crypto-assets units.	'UNIT' — Number of units 'NOML' — Nominal value 'MONE' — Monetary value 'CRYP' — Crypto-asset
26	Quantity currency	Currency in which the quantity is expressed. The currency shall refer to the crypto-asset units, even when the transaction is denominated in sub-components of that crypto-asset. Field only needs to be populated where the quantity is expressed as a nominal or monetary value or crypto-assets units.	{CURRENCYCODE_3} {DTI} {ALPHANUM-20}
27	Initial quantity	The number of units of the crypto-asset in the order. In case the order pertains a fraction of a crypto-asset, indicate the quantity in decimal notation of the unit. The nominal or monetary value of the crypto-asset.	{DECIMAL-18/17} in case the quantity is expressed as number of units {DECIMAL-18/5} in case the quantity is expressed as monetary or nominal value



Order Execution Policy

BitGo Europe ApS

28	Remaining quantity	The total quantity that remains in the order book after a partial execution or in the case of any other event affecting the order. On a partial fill order event, this shall be the total remaining volume after that partial execution. On an order entry this shall equal the initial quantity.	{DECIMAL-18/17} in case the quantity is expressed as a number of units {DECIMAL-18/5} where the quantity is expressed as monetary or nominal value
29	Traded quantity	Where there is a partial or full execution, this field shall be populated with the executed quantity	{DECIMAL-18/17} in case the quantity is expressed as a number of units {DECIMAL-18/5} where the quantity is expressed as monetary or nominal value
30	Minimum Acceptable Quantity (MAQ)	The minimum acceptable quantity for an order to be filled which can consist of multiple partial executions and is normally only for non-persistent order types. This field shall be 'NOAP' if not relevant.	{DECIMAL-18/17} in case the quantity is expressed as a number of units {DECIMAL-18/5} where the quantity is expressed as monetary or nominal value 'NOAP'
31	Minimum executable size (MES)	The minimum execution size of any individual potential execution. This field shall be left blank if not relevant.	{DECIMAL-18/17} in case the quantity is expressed as a number of units {DECIMAL-18/5} where the quantity is expressed as monetary or nominal value
32	MES first execution only	Specifies whether the MES is relevant only for the first execution. This field can be left blank where field 29 is left blank.	'true' 'false'
33	Passive only indicator	Indicates if the order is submitted to the trading platform for crypto-asset with a characteristic/flag, such that the order shall not immediately execute against any contra visible orders.	'true' 'false'



Order Execution Policy

BitGo Europe ApS

34	Passive or aggressive indicator	On partial fill and fill order events, indicates whether the order was already resting on the order book and providing liquidity (passive) or the order initiated the trade and thus took liquidity (aggressive). This field shall be left blank if not relevant	'PASV' — passive or 'AGRE' — aggressive.
35	Self-Execution Prevention	Indicates if the order has been entered with self-execution prevention criteria, so that it would not execute with an order on the opposite side of the book entered by the same member or participant.	'true' 'false'
36	Trading platform for crypto-asset transaction identification code	For orders executed on trading platform for crypto-assets, alphanumerical code assigned by the trading platform for crypto-assets to the transaction pursuant to [Delegated Regulation (EU) xx/xxx RTS on order book records] The code shall be unique, consistent, and persistent per ISO10383 segment MIC and per trading day. The components of the transaction identification code shall not disclose the identity of the counterparties to the transaction for which the code is maintained. For transactions executed by means of transmission within the meaning of Article 1(3) point (a) to an entity providing crypto-asset services outside of the Union, this information shall be recorded where retrievable.	{ALPHANUM-52}
Section J — Indicative auction price and volume			
37	Indicative auction price	The price at which each auction is due to uncross in respect to the crypto-asset for which one or more orders have been placed.	{DECIMAL-18/5} in case the price is expressed as monetary or nominal value. Where price is reported in monetary terms, it shall be provided in the major currency unit. DECIMAL-11/10} in case the price is expressed as a percentage or yield
38	Indicative auction volume	The volume (number of units of crypto-asset) that can be executed at the indicative auction price in field 50 if the auction ended at that precise moment of time.	{DECIMAL-18/17} in case the quantity is expressed as number of units {DECIMAL-18/5} in case the quantity is expressed as monetary



Order Execution Policy

BitGo Europe ApS

			or nominal value
Section K – Order transmission			
39	Transmitting cryptoasset service provider	In case of transmission of order under Article 11, the LEI code of the transmitting cryptoasset service provider.	{LEI}
40	Transmission of an order indicator	‘true’ shall be populated by the transmitting firm within the transmitting firm’s report where the conditions for transmission specified in Article 11 were not satisfied ‘false’ – in all other circumstances	‘true’ ‘false’
Section L –Country of residence of the client			
41	Identification of the country of residence	Shall be populated where a client is a resident of a country other than the one of its nationality as described in Article 9.4.	{NATIONAL_ID} ‘NOAP’



4) Annex 2 – details of transactions to be kept

Field number	Field name	Field description	Details to be provided to competent authority
1	Transaction status	Indication as to whether the transaction is new or a cancellation.	'NEWT' - New 'CANC' - Cancellation
2	Transaction Record Number	Identification number that is unique to the executing firm for each record	{ALPHANUM-52}
3	Trading platform for crypto-asset transaction identification code	This is a number generated by the trading platform for crypto-asset and disseminated to both the buying and the selling parties in accordance with Article 16 of [RTS under Article 76 of Regulation (EU) 2023/1114]. Where relevant, the transaction hash or other identification alphanumeric string which is automatically generated on the DLT that enables to uniquely identify a specific transaction.	{ALPHANUM-52}
4	Executing entity identification code	Code used to identify the entity executing the transaction.	{LEI} {ALPHANUM-20}
5	CASP covered by MiCA	Indicates whether the entity identified in Field 4 is a crypto-asset service provider subject to Regulation (EU) 2023/1114.	'true' - yes 'false' - no
6	Buyer identification code	Code used to identify the acquirer of the crypto-asset. Where the buyer is a legal entity, the LEI code of the acquirer or the alternative identifier referred to in Article 14.3 shall be used. Where the buyer is a natural person, the identifier specified in Article 9 of this Regulation. Where the order was transmitted for execution within the meaning of Article 1(3) (a) to a firm performing crypto-asset services outside of the Union, the MIC code of the platform or the LEI or equivalent identifier referred to in Article 14 of the firm shall be used. If the crypto-asset service provider executes the transaction on a trading platform located in a third country, the LEI of the buyer, the alternative identifier referred to in Article 14.3 or the National ID shall be recorded. 'INTC' shall be used to designate an aggregate client account within the crypto-asset service provider in order to report a transfer into or out of that account with an associated allocation to the individual client(s) out of or into that account respectively.	{LE'} {ALPHANUM-20} {MIC} {NATIONAL_ID} 'INTC'
7	Country of the branch of the crypto-asset service provider for the buyer	Where the buyer is a client, this field should identify the country of the branch that received the order from the client or made an investment decision for a client in accordance with a discretionary mandate given to it by the client as required by Article 16. Where this activity was not conducted by a branch this should be populated with the country code of the home Member State of the crypto-asset service provider or the country code of the Member State where the crypto-asset service provider has established its registered office.	{COUNTRYCODE_2}



Order Execution Policy

BitGo Europe ApS

8	Buyer - first name(s)	Full first name(s) of the buyer. In case of more than one first name, all names shall be included in this field separated by a comma.	{ALPHANUM-140}
9	Buyer - surname(s)	Full surname(s) of the buyer. In case of more than one surname, all surnames shall be included in this field separated by a comma.	{ALPHANUM-140}
10	Buyer - date of birth	Date of birth of the buyer.	{DATEFORMAT}
11	Buyer decision maker code	Code used to identify the person who makes the decision to acquire the cryptoasset. Where the decision is made by a crypto-asset service provider, this field shall be populated with the identity of the crypto-asset service provider rather than the individual making the investment decision. Where the decision maker is a legal entity, the LEI code or the alternative identifier referred to in Article 14.3 of the decision maker shall be used. Where the decision maker is not a legal entity, the identifier specified in Article 9 shall be used.	{LEI} {ALPHANUM-20} {NATIONAL_ID}
12	Buy decision maker - First Name(s)	Full first name(s) of the decision maker for the buyer. In case of more than one first name, all names shall be included in this field separated by a comma.	{ALPHANUM-140}
13	Buy decision maker – Surname(s)	Full surname(s) of the decision maker for the buyer. In case of more than one surname, all surnames shall be included in this field separated by a comma.	{ALPHANUM-140}
14	Buy decision maker - Date of birth	Date of birth of the decision maker for the buyer.	{DATEFORMAT}
15	Seller identification code	Code used to identify the disposer of the crypto-asset. Where the seller is a legal entity, the LEI code of the disposer shall be used. Where the seller is not a legal entity, the identifier specified in Article 9 shall be used. Where the order was transmitted for execution within the meaning of Article 1(3) a) to a firm performing crypto-asset services outside of the Union, the MIC code of the platform or the LEI of the firm shall be used. If the crypto-asset service provider executes the transaction on a trading platform located in a third country, the LEI, the alternative identifier referred to in Article 14.3 or the National ID of the seller shall be provided. 'INTC' shall be used to designate an aggregate client account within the CASP in order to record a transfer into or out of that account with an associated allocation to the individual client(s) out of or into that account respectively.	{LEI} {ALPHANUM-20} {MIC} {NATIONAL_ID} 'INTC'



Order Execution Policy

BitGo Europe ApS

16	Country of the branch for the seller	Where the seller is a client, this field should identify the country of the branch that received the order from the client or made an investment decision for a client in accordance with a discretionary mandate given to it by the client as required by Article 16. Where this activity was not conducted by a branch this should be populated with the country code of the home Member State of the crypto-asset service provider or the country code of the country where the crypto-asset service provider has established its head office or registered office (in the case of third country firms).	{COUNTRYCODE_2}
17	Seller - first name(s)	Full first name(s) of the seller. In case of more than one first name, all names shall be included in this field separated by a comma.	{ALPHANUM-140}
18	Seller - surname(s)	Full surname(s) of the seller. In case of more than one surname, all surnames shall be included in this field separated by a comma.	{ALPHANUM-140}
19	Seller - date of birth	Date of birth of the seller	{DATEFORMAT}
20	Seller decision maker code	Code used to identify the person who makes the decision to sell the crypto-asset. Where the decision is made by a crypto-asset service provider, this field shall be populated with the identity of the CASP rather than the individual making the investment decision. Where the decision maker is a legal entity, the LEI code or the alternative identifier referred to in Article 14.3 of the decision maker shall be used. Where the decision maker is a non-legal entity, the identifier specified in Article 9 shall be used.	{LEI} {ALPHANUM-20} {NATIONAL_ID}
21	Sell decision maker - First Name(s)	Full first name(s) of the decision maker for the seller. In case of more than one first name, all names shall be included in this field separated by a comma	{ALPHANUM-140}
22	Sell decision maker – Surname(s)	Full surname(s) of the decision maker for the seller. In case of more than one surname, all surnames shall be included in this field separated by a comma	{ALPHANUM-140}
23	Sell decision maker - Date of birth	Date of birth of the decision maker for the seller	{DATEFORMAT}
24	Transmission of order indicator	‘true’ shall be populated by the transmitting firm within the transmitting firm’s report where the conditions for transmission specified in Article 11 were not satisfied ‘false’ – in all other circumstances	‘true’ ‘false’
25	Transmitting firm identification code for the buyer	Code used to identify the firm transmitting the order This shall be populated by the receiving firm within the receiving firm’s report with the identification code provided by the transmitting firm.	{LEI} {ALPHANUM-20}
26	Transmitting firm	Code used to identify the firm transmitting the order.	{LEI} {ALPHANUM-20}



Order Execution Policy

BitGo Europe ApS

	identification code for the seller	This shall be populated by the receiving firm within the receiving firm's report with the identification code provided by the transmitting firm	
27	Trading date time	Date and time when the transaction was executed. For transactions not executed on a trading venue, the date and time shall be when the parties agree the content of the following fields: quantity, price, currencies in fields 31, 34 and 44, instrument identification code, instrument classification and underlying instrument code, where applicable. For transactions not executed on a trading venue the time recorded shall be at least to the nearest second. Where the transaction results from an order transmitted by the executing firm on behalf of a client to a third party where the conditions for transmission set out in Article 11 were not satisfied, this shall be the date and time of the transaction rather than the time of the order transmission.	{DATE_TIME_FORMAT}
28	Trading capacity	Indicates whether the CASP undertaking the transaction is carrying out matched principal trading, as defined under Article 3(1), point 40 of Regulation (EU) 2023/1114 or exchange of crypto-assets for funds as defined under Article 3(1), point 19 of Regulation (EU) 2023/1114. Where the transaction does not result from the executing firm carrying out matched principal trading or through exchange of crypto-assets for funds, the field shall indicate that the transaction was carried out under any other capacity.	'DEAL' - Exchange of cryptoassets for funds or other crypto-assets 'MTCH' - Matched principal 'AOTC' - Any other capacity
29	Quantity	The number of units of the crypto-assets or the monetary value of the crypto asset. If the price is expressed in sub-components of that crypto-asset, it shall be nonetheless recorded in decimal notation of the price expressed in units of that crypto-asset. The information reported in this field shall be consistent with the values provided in fields 31 and 32.	{DECIMAL-18/17} in case the quantity is expressed as number of units {DECIMAL18/5} in case the quantity is expressed as monetary or nominal value
30	Quantity currency	Currency in which the quantity is expressed. Only applicable if quantity is expressed as nominal or monetary value. The quantity shall refer to the crypto-asset units, even when the transaction is denominated in sub-components of that crypto-asset. Where the crypto-asset is traded in electronic money/e-money token, the Digital Token Identifier code or the alternative identifier referred to in Article 15 shall be used.	{CURRENCYCODE_3} {DTI} {ALPHANUM-20}
31	Price	Traded price of the transaction excluding, where applicable, commission, any other fee and accrued interest. If the crypto-asset is traded based on a currency pair the price shall express the quantity of the quote currency for one unit of the base currency.	{DECIMAL-18/13} in case the price is expressed as monetary value {DECIMAL-11/10} in case the price is expressed as



Order Execution Policy

BitGo Europe ApS

		If the price is expressed in sub-components of that crypto-asset, it shall be nonetheless recorded in decimal notation of the price expressed in units of that crypto-asset. Where price is recorded in monetary terms, it shall be provided in the major currency unit. Where price is not applicable, the value shall be 'NOAP'. The information recorded in this field shall be consistent with the values provided in field 30.	percentage or yield {DECIMAL-18/17} in case the price is expressed as basis points 'NOAP' in case the price is not applicable
32	Price Currency	Currency in which the price is expressed (applicable if the price is expressed as monetary value). Where price of the crypto-asset is expressed in monetary terms and it is expressed in a currency pair, the currency pair in which the price for the crypto-asset related to the order is expressed shall be reported. The first currency code shall be that of the base currency and the second currency code shall be that of the quote currency. The quote currency determines the price of one unit of the base currency. The ISO currency code and the DTI short name as registered according to the ISO 24165-2 data elements for registration of the DTI or the alternative identifier referred to in Article 15 shall be used to represent the fiat currency and the crypto asset respectively in the currency pair.	{CURRENCYCODE_3} {DTI} {ALPHANUM-20} {CURRENCYCODE_3} should be used for fiat currencies in a currency pair {DTI_SHORT_NAME} should be used for crypto assets in a currency pair "NOAP"
33	Trading platform for crypto-asset	Identification of the trading platform for crypto-asset where the transaction was executed. Use the ISO 10383 segment MIC for transactions executed on a trading platform for crypto-asset. Where the segment MIC does not exist, use the operating MIC. Use MIC code 'XOFF' for crypto-assets admitted to trading, or traded on a trading platform for crypto-asset or for which a request for admission was made, where the transaction on that crypto-asset is not executed on a trading platform for cryptoasset. Use MIC code 'XXXX' for crypto-assets that are not admitted to trading or traded on a trading platform for crypto-asset or for which no request for admission has been made.	{MIC}
34	Country of the branch membership	Code used to identify the country of a branch of the crypto-asset service provider whose trading platform for crypto-asset membership was used to execute the transaction. Where a branch's trading platform for crypto-asset membership was not used, this field shall be populated with the country code of the home Member State of the crypto-asset service provider or the country code of the country where the firm has established its head office or registered office (in the case of third country firms). This field shall only be populated for the market side of a transaction executed on a trading platform for crypto-asset.	{COUNTRYCODE_2}
35	Up-front payment	Monetary value of any up-front payment received or paid by the seller. Where the seller receives the up-front payment, the value populated is positive. Where the seller pays the up-front payment, the value populated is negative.	{DECIMAL-18/5}
36	Up-front payment currency	Currency of the up-front payment.	{CURRENCYCODE_3} {DTI}



Order Execution Policy

BitGo Europe ApS

			{ALPHANUM-20}
37	Complex trade component id	Identifier, internal to the crypto-asset service provider, to identify all the transaction records related to the same execution of a combination of crypto-assets. The code must be unique at the level of the firm for the group of transaction records related to the execution.	{ALPHANUM-35}
38	Crypto-asset identification code	Code used to identify the crypto-asset This field applies to crypto-assets for which a request for admission to trading has been made, that are admitted to trading or traded on a trading platform for cryptoasset.	{DTI} {ALPHANUM-20}
39	Crypto-asset full name	Full name of the crypto-asset.	{ALPHANUM-350}
40	Crypto-asset classification	Taxonomy used to classify the crypto-asset. or A complete and accurate CFI code shall be provided when available.	ART EMT OT {CFI_CODE}
41	Investment decision within the cryptoasset service provider	Code used to identify the person or algorithm within the crypto-asset service provider taking the investment decision. The code shall be unique over time for each set of code or trading strategy that constitutes the algorithm and shall be used consistently when referring to the algorithm or version of the algorithm once assigned to it. For natural persons, the identifier specified in Article 9 shall be used If the investment decision was made by an algorithm automatically determining individual parameters of orders such as whether to initiate the order or its timing, price or quantity, the field shall be populated as set out in Article 8. Field only applies for investment decision within the firm. Where the transaction is for a transmitted order that has met the conditions for transmission set out in Article 11, this field shall be populated by the receiving firm within the receiving firm's record using the information received from the transmitting firm.	{NATIONAL_ID} - Natural persons {ALPHANUM-50} - Algorithms
42	Country of the branch responsible for the person making the investment decision	Code used to identify the country of the branch of the crypto-asset service provider for the person taking the investment decision, as set out in Article 16. Where the person taking the investment decision was not supervised by a branch, this field shall be populated with the country code of the home Member State of the crypto-asset service provider or the country code of the Member State where the crypto-asset service provider has established its registered office. Where the transaction is for a transmitted order that has met the conditions for transmission set out in Article 11, this field shall be populated by the receiving firm within the receiving firm's record using the information received from the transmitting firm. This field is not applicable when the investment decision was made by an algorithm automatically determining individual parameters of orders such as whether to initiate the order or its timing, price or quantity.	{COUNTRYCODE_2}



Order Execution Policy

BitGo Europe ApS

43	Execution within firm	Code used to identify the person or algorithm automatically determining individual parameters within the crypto-asset service provider for the execution of orders such as whether to initiate the order or its timing, price or quantity. For natural persons, the identifier specified in Article 9 shall be used. If the execution was made by an algorithm automatically determining individual parameters of orders such as whether to initiate the order or its timing, price or quantity, the field shall be populated as set out in Article 8.	{NATIONAL_ID} - Natural persons {ALPHANUM-50} - Algorithms CLIENT - Client
44	Country of the branch supervising the person determining the conditions for execution	Code used to identify the country of the branch of the crypto-asset service provider for the person determining the execution of the transaction, as set out in Article 16. Where the person responsible was not supervised by a branch, this field shall be populated with the country code of the home Member State of the crypto-asset service provider, or the country code of the country where the crypto-asset service provider has established its registered office. This field is not applicable when the execution was made by an algorithm automatically determining individual parameters of orders such as whether to initiate the order or its timing, price or quantity.	{COUNTRYCODE_2}
45	Short selling indicator	Designation to identify any sale of a crypto-asset which the seller does not own at the time of entering into the agreement to sell including such a sale where at the time of entering into the agreement to sell the seller has borrowed or agreed to borrow the share or debt instrument for delivery at settlement.	'true' 'false'



5) Annex 3 – on chain data to be kept

Field number	Field name	Field description	Details to be provided to competent authority
1	Transaction hash	Identifier enabling the unique identification of a specific transaction occurring on the network.	{ALPHANUM-140}
2	Wallet addresses	Code uniquely identifying the wallet, belonging to the buyer/seller, to which the crypto-asset is transferred.	{ALPHANUM-140}
3	Smart Contract Addresses	Code uniquely identifying the smart contract address.	{ALPHANUM-140}
4	Timestamp	Timestamp of the creation of the block.	{DATE_TIME_FORMAT}
5	Quantity/ Current Total Supply	Ratio between the transferred quantity and the current floating amount of the asset.	
6	Token ID	Digital Token Identifier	{DTI}
7	Network fee	Fees which are requested to cover the costs for the creation of a new block.	
8	Fee limit	This is the maximum amount of “network fees” that an on-chain user is willing to pay for the executions of a specific transaction.	
9	Data size	This field is connected to the above. On-chain transaction can contain “attachments” in a specific data field that affect the “network fees” required to process the transaction.	
10	To	The unique identifiers for buyer and seller are usually generated by the DLT protocol on the basis of the buyer/seller wallet addresses.	{ALPHANUM-140}
11	From	The unique identifier for seller usually generated by the DLT protocol on the basis of the seller wallet addresses.	{ALPHANUM-140}
12	Currency	Currency code	{CURRENCYCODE_3} {DTI}
13	Transaction Record Number	Identification number reported in Field 2 of Section 3 that is unique to the executing firm for each record to ensure that a link can be made between the onchain report and the off-chain one.	{ALPHANUM-140}



6) Annex 4 - Legend for information to be provided to the competent authority

Symbol	Data type	Definition
{ALPHANUM-n}	Up to n alphanumerical characters	Free text field.
{CFI_CODE}	6 characters	ISO 10962 CFI code
{COUNTRYCODE_2}	2 alphanumerical characters	2 letter country code, as defined by ISO 3166-1 alpha-2 country code
{CURRENCYCODE_3}	3 alphanumerical characters	3 letter currency code, as defined by ISO 4217 currency codes
{DATE_TIME_FORMAT}	ISO 8601 date and time format	Date and time in the following format: YYYY-MM-DDThh:mm:ss.dddddddZ. — ‘YYYY’ is the year; — ‘MM’ is the month; — ‘DD’ is the day; — ‘T’ – means that the letter ‘T’ shall be used — ‘hh’ is the hour; — ‘mm’ is the minute; — ‘ss.ddddddd’ is the second and its fraction of a second; — Z is UTC time. Dates and times shall be recorded in UTC.
{DATEFORMAT}	ISO 8601 date format	Dates shall be formatted in the following format: YYYY-MM-DD.
{DECIMAL-n/m}	Decimal number of up to n digits in total of which up to m digits can be fraction digits	Numerical field for both positive and negative values. — decimal separator is ‘.’ (full stop); — negative numbers are prefixed with ‘-’ (minus); Values are rounded and not truncated.
{DTI}	9 alphanumerical characters	Digital token identifier as defined in ISO 24165 standard
{DTI_SHORT_NAME}	n alphanumerical characters	DTI short name as registered according to the ISO 24165-2 data elements for registration of the DTI
{INTEGER-n}	Integer number of up to n digits in total	Numerical field for both positive and negative integer values.
{ISIN}	12 alphanumerical characters	ISIN code, as defined in ISO 6166
{LEI}	20 alphanumerical characters	Legal entity identifier as defined in ISO 17442



Order Execution Policy

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{MIC}	4 alphanumeric characters	Market identifier as defined in ISO 10383
{NATIONAL_ID}	35 alphanumeric characters	The identifier is derived in accordance with Article 9 and Annex II of Commission Delegated Regulation (EU) 2017/590