

POSIT (UK) MTF

User Guidance

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Contents

1) Introduction	3
2) POSIT (UK) MTF Universe	3
3) POSIT (UK) MTF Trading Calendar, Hours and Trading Sessions	3
4) Market Segments	3
5) Equities Dark Segment – Functional Summary	3
5.1 Matching Logic	3
5.2 Supported Order Types and Order Protection Constraints	4
6) Equities Periodic Auction Segment – Functional Summary	4
6.1 Matching logic	4
6.2 Supported Order Types and Order Protection Constraints	5
6.3 Trading Collars	6
6.4 Order Cancels and Downward Amendments	6
6.5 Market Data Publication	6
7) Access/Connectivity	7
8) Tick Size Rules	7
9) “Throttle Limit”	7
10) Order Types	7

1) Introduction

This document (the "**User Guidance**") is to be used in conjunction with the POSIT (UK) MTF Rulebook (the **Rulebook**) and POSIT (UK) MTF Participant Manual (the **Participant Manual**). POSIT UK MTF FIX and Connectivity Guidance is also available on www.virtu.com.

Information contained in this User Guidance is subject to change at any time. The latest version of the User Guidance is available on the Website.

Unless otherwise defined herein, terms defined in the Appendix I of Rulebook shall have the same meaning in this User Guidance.

2) POSIT (UK) MTF Universe

POSIT (UK) MTF only accepts orders for the Financial Instruments listed in the **POSIT UK MTF Universe**.

A list of Financial Instruments currently in the POSIT (UK) MTF universe of tradable Financial Instruments is available at the Website.

3) POSIT (UK) MTF Trading Calendar, Hours and Trading Sessions

POSIT (UK) MTF allows trading on business days (Monday to Friday) for Financial Instruments where the primary listing market is open for trading. Where a primary listing market is closed on a business day then POSIT (UK) MTF will be closed for all securities in that market.

The trading hours of each of the segments of POSIT (UK) MTF are as follows:

Equities Dark segment

POSITNow matches: Between the hours of 06:00 and 16:30 British Standard Time inclusive

Periodic Auction segment

Intraday session: Between the hours of 06:00 and 16:30 British Standard Time inclusive

After hours session: Between the hours of 16:35 and 17:00 British Standard Time inclusive

POSIT Close matches: Between the hours of 16:35 and 17:00 British Standard Time inclusive

4) Market Segments

Participants may interact in any one of the following POSIT (UK) MTF market segments:

- Equities Dark Segment
- Equities Periodic Auction Segment (**POSIT Auction**)

Participants can only interact within the respective system for which they have been accepted to enter orders. Orders sent to a system will not be available for interacting in other systems in POSIT (UK) MTF.

5) Equities Dark Segment – Functional Summary

5.1 Matching Logic

POSITNow System:

Orders may enter the system availing of the pre-trade transparency RPW Waiver subject to these orders being entered with a Midpoint Peg, and as such, may only match at the midpoint of the PBBO.

Orders availing of the pre-trade transparency LIS Waiver may be entered to the system at any price. These orders may only match within the prevailing PBBO. LIS orders may also enter the system with pegged price instructions which may only match at the specified peg or better.

Both RPW and LIS orders are matched one-to-one with the following priority:

Order Type	Matching Priority
RPW	Size / Time
LIS	Price / Size / Time

In instances where LIS orders match and trade but do not complete, the remainder of the order will continue avail of the LIS waiver (even if the remaining quantity is below LIS) until cancelled or the end of the trading day.

There must be a tradable bid and offer on the primary listing market for any trading to take place. Where a Financial Instrument is halted or suspended on the primary listing market, then no trading will take place. Trading will resume once POSIT (UK) MTF detects that the halt or suspension has been removed and the Financial Instrument has tradable bid/offer quotes on its primary listing market.

5.2 Supported Order Types and Order Protection Constraints

The following order types are supported: **Market** or **Limit**.

Participants may additionally choose to include each of the following trading constraints: **Minimum Quantity** and **Self Match**.

The following order time in force instructions are supported: **DAY** or **Immediate or Cancel (IOC)**. An expiry time may also be specified.

See Section 10 'Order Types' for more details.

6) Equities Periodic Auction Segment – Functional Summary

6.1 Matching logic

A lit periodic auction segment running auctions at frequent intervals with randomised timing and subject to certain conditions being met, such auctions being triggered on receipt and acceptance of a buy or sell order into the system segment.

POSIT Auction contains two separate trading sessions: (1) Intraday and (2) After hours. Orders must state which trading session the respective order is to be submitted to.

For each session POSIT Auction will run an auction for a Financial Instrument as soon as there is a trading opportunity for that particular Financial Instrument within the POSIT Auction segment. The fixed call period and maximum random call period will be made public on the Website. Unless otherwise stated, the default period will be a fixed call period of 50 milliseconds and a maximum of 50 milliseconds for the random call period.

Orders will participate in any potential auctions until any specified expiration time or time in force instruction on the order; the order is fully filled; cancellation of the order (by the relevant Participant or by the Operator); or the end of the trading session.

Any orders unmatched at the end of trading session will be cancelled.

Orders will be accepted prior to the opening times of each session but no trading will take place until the market open hours.

Price Determination Rule: Where there are matching buy and sell orders within the system, a single match price is determined based on the open orders within the auction period and through a **Price Determination Rule**. The Price Determination Rule will identify:

- (1) Maximum executable volume, the price(s)* that maximizes the number of shares that can be executed, taking into consideration any order protection constraints and the allocation logic;

- (2) If there are multiple price levels identified in (1) that achieve maximum executable volume then take the price that is closest to the Reference Price. For auctions during the regular trading session the Reference Price will be the current the midpoint of the prevailing best bid and best offer of the Financial Instrument's PBBO. For auctions After hours the Reference Price will be the Primary Market Closing Price of the Financial Instrument's primary listing market; and
- (3) If there are two price levels identified in (2) that are equally distant from the Reference Price, then the highest price will be taken.

** The price levels that will be assessed for maximum executable volume will be at a tick size or half a tick of the PBBO*

The Price Determination Rule will result in a single price.

The Price Determination Rule is for indicative price calculation and for calculating the final execution price for the auction.

Allocation: Where there are multiple buy orders or sell orders that could execute at a given price level and not all order sizes can be filled from the match then orders will be matched based in the order of priority: Participant/User, Size and Time.

- (i) **Participant/User priority** – where there are matching buy and sell orders from the same Participant/User at the price identified from the Price Determination Rule, match these orders first, followed by,
- (ii) **Size priority** – orders that are largest in size first followed by,
- (iii) **Time priority** – orders in order of earliest order entry time

Orders will remain in POSIT (UK) MTF for matching until they are matched, cancelled, expired or at the end of the trading session.

Orders may be accepted by the system prior to the opening times of each trading session but no trading will take place until the start of market trading hours.

POSIT Close System:

Orders are matched on a pro rata size basis at the closing price of the Financial Instrument on its primary listing market.

6.2 Supported Order Types and Order Protection Constraints

Order types supported: **Market** or **Limit** must be specified.

A **Peg Bid, Mid** or **Ask** instruction can be specified for the intraday session, where the peg is pegged to the primary market listing of the relevant Financial Instrument. A **Peg Closing price** can be added for the After-hours session, where the peg is pegged to the closing price of the primary market listing for the relevant Financial Instrument.

Participants may additionally choose to include each of the following trading constraints: **Minimum Quantity** and **Self Match, At Price**.

Minimum Quantity can be specified as either MAQ or MES. Participants must instruct the Operator of their preference for Minimum Quantity to be treated as MAQ or MES as a Participant level setting.

The following order time in force instructions are supported: **DAY** or **IOC**. An expiry time may also be specified.

At price – when specified, a limit or pegged order can only execute at this price.

See Section 10 'Order Types' for more details.

6.3 Trading Collars

To protect the market and Participants against adverse price execution, the system will apply a price collar for Price Determination. During the regular trading session the default price collar will be set at the PBBO for the relevant Financial Instrument where trading can only take place at or within the PBBO.

Where there are orders with an “At Price” order constraint outside of the PBBO, the current Primary High/Low of the day for the relevant Financial Instrument will apply as an alternative collar. This alternative collar will only apply to orders that have an “At price” order constraint and will prevent the trading of these orders outside of the Primary High or Low of the day for the relevant Financial Instrument.

During the After hours trading session the collar will be set at a predefined number of ticks from the Primary Market Closing Price. The predefined number of ticks will be based on the average spread size of each Financial Instrument and recalculated periodically. The number of ticks for this After hours collar will be made publicly available via the POSIT (UK) MTF Universe File. The price determination rule will not consider prices that are outside the collar. If the only price from the price determination rule is outside of the collar then no matching (indicative or trade) can occur. If there is no collar that can be determined then no trading will take place.

Definition of PBBO: The PBBO is constructed by the Operator as the best displayed bid order and best displayed sell order from a relevant Financial Instrument’s primary market listing per Financial Instrument. For each Financial Instrument in the POSIT (UK) MTF universe, a PBBO is constructed in real-time using the Operator’s market data technology.

The PBBO consolidates the best bid and best offers from the primary market listing.

Definition of Primary High/Low: The Primary High/Low is constructed by the Operator as the current day’s Highest and Lowest traded price from the start of trading from relevant Financial Instrument’s primary market listing per Financial Instrument. For each Financial Instrument in the POSIT (UK) MTF universe, a High and Low traded price is calculated in real-time using the Operator’s market data technology.

The Primary High/Low will initially consolidate the Highest and Lowest trading price from the primary listing market. These markets, that are to be included, are the same markets that are used for the PBBO calculation.

6.4 Order Cancels and Downward Amendments

To protect Participants against adverse price execution, the system will not accept order cancel requests or downward amendments during an auction. Downward amendments include a reduction in order size or a more passive limit price change. Upward amendments that include an increase in size or a more aggressive limit price change will be accepted on arrival into the system.

6.5 Market Data Publication

The following information is made available for each auction:

- Indicative price: The price at which the system has identified a trading opportunity, using the price determination rule
- Indicative volumes: The volume that would execute for the Indicative price identified above

Publication mechanism: A real-time market data feed, provided by the Operator, is made available for the pre-trade market data information (**MD feed**).

To access the MD feed please contact the Operator using the contacts supplied in this document. Further details of the MD feed are also available via the POSIT (UK) MTF market data technical specification document on the Website.

7) Access/Connectivity

Participants may enter orders directly into POSIT (UK) MTF through VIUK's FIX based connectivity or through other means agreed with VIUK. Details are available via the Technical specification document.

8) Tick Size Rules

POSIT (UK) MTF follows the tick size rules as prescribed in Article 49 of MiFID II. POSIT (UK) MTF will assign a tick size per Financial Instrument based on RTS 11 rules, assigning a tick size based on the Financial Instrument's Average Daily Number of Transactions (**ADNT**).

Where ADNT is not available for a Financial Instrument, the POSIT (UK) MTF will follow the tick size for the highest liquidity band in RTS 11.

POSIT (UK) MTF may use the tick size of the non-UK primary where that tick size is more granular than the local listing.

The tick size per Financial Instrument will be made available via the POSIT MTF UK Universe File on the Website.

9) "Throttle Limit"

POSIT (UK) MTF imposes a restriction on the number of messages per second from a Participant that is controlled at a Participant session level. Messages that exceed a "throttle limit" will be rejected. These throttle limits only apply to orders and corrections. Any cancellations will be accepted by POSIT (UK) MTF. The throttle limit is set at 2,000 messages per second.

10) Order Types

- a) Limit price orders – orders that can be executed at a price that is equal or better to the specified limit price.
- b) Market orders – orders that can be executed at any price, within the rules of the relevant segment.
- c) Pegged orders – orders that can be executed at a price that is equal or better to the specified peg at the time of execution. Pegs can include:
 - i) Primary Midpoint – pegs to the Midpoint of the current Bid and Offer on the primary listing market of the relevant Financial Instrument;
 - ii) Primary Aggressive – pegs to the current offer price for buy orders and the current bid for sell orders, in each case, of the current price on the primary listing market of the relevant Financial Instrument;
 - iii) Primary Passive – pegs to the current bid price for buy orders and the current offer for sell orders, in each case, of the current price on the primary listing market of the relevant Financial Instrument; and
 - iv) Primary Closing price – pegs to the current day's closing price on the primary listing market of the relevant Financial Instrument.
- d) Immediate-or-Cancel (IOC) orders - orders that are executed immediately, filling all or part of the order, with any remaining unfilled portions cancelled automatically.

Additional constraints that may be applied to orders:

- a) Minimum Acceptable Quantity (MAQ) – the minimum size to be matched;
- b) Minimum Execution Size (MES) – the minimum size to be matched and where at least one contra meets this minimum size;
- c) Self match – when specified, orders may only execute for the same submitting Participant or user; and

- d) At price – when specified, a limit or pegged order can only execute at this price.

The following time in force instructions may also be applied to orders:

- a) DAY – orders will remain in the system until the end of the POSIT trading session;
- b) Good for One Auction - (for the POSIT Auction segment only) orders will remain in the system until the end of the next auction in the relevant instrument; and
- c) Good if Auction – (for the POSIT Auction segment only) orders will remain in the system where there is an auction in progress in the relevant instrument at the time the order enters the system, or where an auction in the relevant instrument can be started upon entry of the order into the system.