

Virtu Financial Ireland Limited

Commercial Policy (Crypto)



VIRTU
FINANCIAL



Table of Contents

1	Introduction	3
1.1	Purpose & Scope	3
1.2	Regulatory Requirements & Guidance	3
1.3	Instruments and Services in Scope	3
2	Policy	4
2.1	Availability of quotes	4
2.2	Client Profile	4
2.3	Updates and validity of quotes	4
2.4	Trading hours	4
2.5	Limitation on the value and the number of transactions	4
2.6	Requesting review of a potential erroneous trade	4
2.7	Pricing Methodology	4
2.8	Fees & Charges	5
2.9	Availability	5



1 Introduction

1.1 Purpose & Scope

Under Article 77(1) of Regulation (EU) 2023/1114 ("MiCAR"), crypto-asset service providers exchanging crypto-assets for funds or other crypto-assets shall establish a non-discriminatory commercial policy that indicates, in particular, the type of clients they agree to transact with and the conditions that shall be met by such clients.

This Commercial Policy is designed to satisfy that requirement and sets out the standards for governing access to executable quotes where Virtu Financial Ireland Limited ("VFIL" or "the Firm") is acting as a principal liquidity provider in relation to certain crypto assets.

It is also used to disclose the Firm's policies on pricing, costs and fees applicable to its crypto-asset services in accordance with Article 66(4) of MiCAR.

1.2 Regulatory Requirements & Guidance

VFIL is an Irish domiciled entity, regulated by the Central Bank of Ireland ("CBI") as a MiFID investment firm and hold permissions to trade on own account. The Firm has completed the notification process under Article 60 of MiCAR and is authorised to provide the crypto-asset services of exchanging crypto-assets for funds and other crypto-assets.

VFIL, for the purposes of the services it provides in crypto assets, is subject to MiCAR and its related guidance documents.

1.3 Instruments and Services in Scope

This Commercial Policy applies to the trading of crypto assets by VFIL while providing the service of exchanging of crypto-assets for funds and other crypto-assets ("in-scope services").



2 Policy

2.1 Availability of quotes

With respect to the in-scope services, VFIL shall fulfil its quoting intentions by streaming executable quotes through its electronic trading system directly to onboarded clients.

VFIL clients can access the firm quotes by contacting the VFIL trading desk electronically via chat or email so that access can be organized to the quote streams. The quotes provided may only be available to trade for a limited time that is reasonable to allow clients to execute against them.

VFIL will not accept any orders or related communications via telephone.

2.2 Client Profile

VFIL will only provide in-scope services to institutional regulated clients. VFIL will not onboard or offer liquidity directly to retail clients.

VFIL shall allow access to its quotes for clients who satisfy the following criteria:

1. have completed the on-boarding process and approved as a counterparty in line with VFIL's Client KYC Process;
2. have agreed to VFIL's Terms of Business.

VFIL may decide to refuse to enter into or discontinue business relationships with clients on the basis of commercial considerations, including but not limited to the client's credit status, the counterparty risk and the final settlement of the transaction, or any legal/regulatory restrictions.

2.3 Updates and validity of quotes

VFIL has the right to change/update its firm quotes at any time. VFIL shall undertake to enter into transactions for its firm quotes as long as the given quote has not been withdrawn or updated. Under exceptional market conditions, for example in market circumstances where the Firm's ability to maintain prudent risk management practices is prevented by technological issues, risk management issues relating to regulatory capital, margining or inability to hedge a position – e.g. due to market suspension, VFIL may withdraw its executables quotes.

2.4 Trading hours

VFIL intends to provide quotes on a 24/5 basis (i.e. Monday-Friday, 24 hours a day).

2.5 Limitation on the value and the number of transactions

In order to limit the risk of exposure to the same counterparty, VFIL may deny access to its firm quotes or refuse to enter into transactions with a counterparty where the total notional value of unsettled trades with that counterparty exceeds the threshold of its approved credit and counterparty risk limit. Furthermore, VFIL also reserves the right to limit the total number of transactions from different clients at the same time where the volume of orders sought by counterparties considerably exceeds the norm.

2.6 Requesting review of a potential erroneous trade

In order to request the review of a potential erroneous trade carried out on the VFIL, the relevant counterparty to the trade must notify VFIL of the request to review the trade by email at compliance-eu-reports@virtu.com and coreops@virtu.com as soon as possible and no later than 10:00am CET of the business day following the day of the execution of the potential error trade. The email requesting the review must include the following details to identify the trade:

- counterparty LEI,
- instrument,
- trade size,
- trade price,
- time of execution.

VFIL shall confirm to the requesting counterparty that the trade is under review together with the reference number of the issue. VFIL may follow-up the request for further details if necessary. VFIL shall inform the counterparty of the decision to resolve the issue within 48 hours of the initial request for review.

2.7 Pricing Methodology

VFIL determines crypto-asset prices using contemporaneous market data from multiple European and global liquidity sources (e.g. crypto exchanges) to establish a consolidated view of available liquidity and compute the prices at which it can buy and sell crypto-assets. This computation may include adjustments for relevant costs, hedging costs and a reasonable commercial margin.

Prices are determined objectively, taking into account available liquidity and the Firm's ability to hedge its exposure effectively.



2.8 Fees & Charges

VFIL does not charge clients any separate fees, commissions or other charges for its crypto-asset services.

2.9 Availability

This Commercial Policy is made available to clients on the <https://www.virtu.com/regulatory-disclosures/> website. Any update or modification of this Commercial Policy is applicable when it is published on this web site.