



# Adhering to Block Rules Post-Trade Monitoring



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## Document History

Version	Date	Change Description
1.0	22/01/2026	First version
2.0	20/02/2026	Inclusion of Table of Content, Document History, Select Order ID footnotes, updated Overview with links to other relevant documents.
2.1	17/04/2026	Updated header version number, Section 1.5 - updated column headers in example csv file, updated supporting evidence to be provided by supporting e-mail.
2.2	30/04/2026	Addition of "Other" MVT Exception reason in Section 1.5.



# 1 Planned post-trade monitoring of block rule adherence

## 1.1 Overview

In anticipation of the implementation of Minimum Volume Thresholds (“MVT”) in Q1 2026, the LME would like to inform Members that it will conduct post-trade monitoring to assess Members’ compliance with the Matching Rules and associated obligations, including adherence to the Minimum Volume Threshold requirements.

As part of this process, the LME may periodically – and/or on an ad-hoc basis - request Members to review a sample of inter-office trades that fall within the scope of the block rules. For each trade in the sample, Members will be required to provide a complete and accurate explanation of the applicable exception or exemption, supported by appropriate evidence.

This document should be read in conjunction with the *MVT Member Trade Data File Interface Specification*, *Blocks Guidance*, and *Examples to Support the Blocks Guidance*, available [here](#) on LME.com.

## 1.2 Monthly Audit Process

The LME will issue a monthly audit request via e-mail and disseminate a secure transfer (e.g., SFTP)<sup>1</sup>, containing a standardized CSV template listing a sample of trades in LME Liquid Instruments from the prior month, and will notify the relevant Compliance Officer of each Member who has received an audit request that the reports are available, including confirmation of the deadline for submitting their response. The LME will make the CSV template and other relevant supporting details available in forthcoming LME Group General Updates e-mails.

## 1.3 Template Contents

Each trade entry will include key details such as Business Date, Trade Date, Matching Reference Number, Venue, Contract, Volume, Prompt, Price, Leg Count, and Trade Time. A draft version of a csv file is provided in the appendix but may be subject to change. Technical details regarding CSV form, format and content and information required to receive, identify, and process the outbound MVT Trade Data file is documented in the *MVT Member Trade Data File Interface Specification* (see link in section 1.1).

## 1.4 Exclusions

Where possible, Client transactions that can be clearly linked to LMEselect trades compliant with the MVT Rules will be excluded from the sample<sup>2</sup>. The LME will perform validation based on the data available from members. Where members choose to link trades using the various reference fields provided, this may reduce the number of requests or the likelihood of additional ad-hoc requests

## 1.5 Member Action Required

Members must complete the template with details of the Client trade(s) where relevant, including:

- Matching Reference Number(s)
- Select Order ID(s)<sup>3</sup>
- MVT Exception/Exemption Reason (e.g., Electronic Trade Allocation, Delta Hedge, Strip, Sub-Account Split, Cash & Adjust, Market on Close, LMEselect Closed, Other)

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<sup>1</sup> This can include secure e-mail where other secure transfer mechanisms such as sftp are unavailable.

<sup>2</sup> It is recommended to use the Select Order ID, referred to in OTP as Order ID (Fix Tag 37) and in LMEsmart as Select Order Number (Fix Tag 5939)

<sup>3</sup> Referred to in OTP as Order ID (Fix Tag 37) and in LMEsmart as Select Order Number (Fix Tag 5939)



- Any supporting evidence should be provided via email to **[interofficetrading@lme.com](mailto:interofficetrading@lme.com)** using the “Line Number” from column A of the MVT Member Trade Data file as a reference.



The following provides further detail regarding the information Members will receive in the CSV file:

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
1	Report Id	Business Date	Trade Date	Matching Reference Number	Venue	Contract	Volume	Prompt	Price	Leg Count	Leg Number	Trade Time	Initiating Matching Reference Number	Initiating Select Order ID	MVT Exception Reason	Supporting Evidence
2	123456	31/03/2026	31/03/2026	2026033100012345	InterOffice	AHD	3	30/06/2026	2540.5	0		31/03/2026 11:40:00				

The following table provides additional detail on the expected information to be provided for each of the Exception/Exemption reasons

MVT Exception/Exemption Reason	LMeselect Order ID <sup>4</sup> (s)	Matching Reference Number(s)	Supporting Evidence Provided?
Electronic Trade Allocation	Select Order ID's for the LMeselect execution. For adjustments, the ID's for all executions (outright and carry) are required.	N/A	Y or N - Where Yes then additional information will be expected via a supporting e-mail using the trade reference in column A of the CSV.
Delta Hedge	N/A	Matching reference Number of the corresponding options trade.	
Strip	N/A	All Matching reference numbers corresponding to all legs of the strip.	
Sub-Account Split (where Client trade is below MVT)	Select Order ID(s) of all relevant LMeselect execution	All Matching reference numbers corresponding to the original Client trade	
Sub-Account Split (where Client trade is above MVT and split below MVT)	N/A	All Matching reference numbers corresponding to the original Client trade	

<sup>4</sup> Referred to in OTP as Order ID (Fix Tag 37) and in LMEsmart as Select Order Number (Fix Tag 5939)



MVT Exception/Exemption Reason	LMeselect Order ID <sup>5</sup> (s)	Matching Reference Number(s)	Supporting Evidence Provided?
Cash & Adjust	Optional - Select Order ID(s) of any relevant LMeselect execution	N/A	Y - Provide evidence of Client comms regarding the Client order or other applicable evidence
Market on Close (TAS available)	Select Order ID(s) of all relevant LMeselect executions including adjustment where relevant.	N/A	Y or N - Where Yes then additional information will be expected via a supporting e-mail using the trade reference in column A of the CSV.
Market on Close (TAS not available)	N/A.	N/A.	Y - Provide evidence of Client comms regarding the Client order or other applicable evidence
LMeselect Closed	N/A	N/A	Y - Details of Client comms regarding the Client order (including time of Client order)
Other	Optional - Select Order ID(s) of any relevant LMeselect execution(s)	Optional - Matching reference number(s) of any relevant execution(s)	Y or N - Where Yes then additional information will be expected via a supporting e-mail using the trade reference in column A of the CSV.

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<sup>5</sup> Referred to in OTP as Order ID (Fix Tag 37) and in LMESmart as Select Order Number (Fix Tag 5939)



## 1.6 Additional Information

Any supplementary data needed to demonstrate compliance should be submitted via a supporting encrypted e-mail using the trade reference in column A of the CSV as a reference.

To ensure proportionality and fairness, the LME will calibrate sample sizes and response timeframes in line with audit requirements.

Further information will be provided in due course regarding:

- The secure mechanism for transferring trade data; and
- The implementation details for monitoring adherence to the block rules.

Regular updates will continue to be communicated via the LME Group General Updates e-mails.

Members are reminded that further details on Blocks and the *Modernising the Market* measures are available at: [Modernising the market | London Metal Exchange](#)