



# Formal Verification of Financial Algorithms, Progress and Prospects

Grant Olney Passmore  
ACL2-2017, Austin

Joint work with Denis Ignatovich and our incredible team at AI

**Video**  
**(see it on <http://imandra.ai>)**

# Problem

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**Glitches:** trading system errors in design or implementation, often causing significant losses (e.g., Knight Capital's **loss of \$400M**)

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- **Regulations:** Transparency, safety and fairness (Reg ATS-N), best execution (Reg NMS)
- **Practice:** Be able to write a spec and analyse basic regulatory properties of a trading venue's matching logic

# Goals for this talk

- **Intuitions:**

- “Venue matching logics” = “ISA of the market”
- Pressing need for:
  - venues to be bullet-proof w.r.t. safety and fairness regulations
  - matching logics to be formally described to regulators and market participants
  - matching logics to be formally analysed w.r.t. precise encodings of regulatory directives
  - financial mathematics (stochastic calculus) that takes precise discrete behaviour of matching logics into account

# The Stack of Financial Algorithms

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Venues

# The Stack of Financial Algorithms

Smart Order Routers

Venues

# The Stack of Financial Algorithms

Trading Algos

Smart Order Routers

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# The Stack of Financial Algorithms

Algo Containers

Trading Algos

Smart Order Routers

Venues

# The Stack of Financial Algorithms

Inventory Management

Algo Containers

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Collateral Trading

Inventory Management

Algo Containers

Trading Algos

Smart Order Routers

Venues

# The Stack of Financial Algorithms

⋮

Collateral Trading

Inventory Management

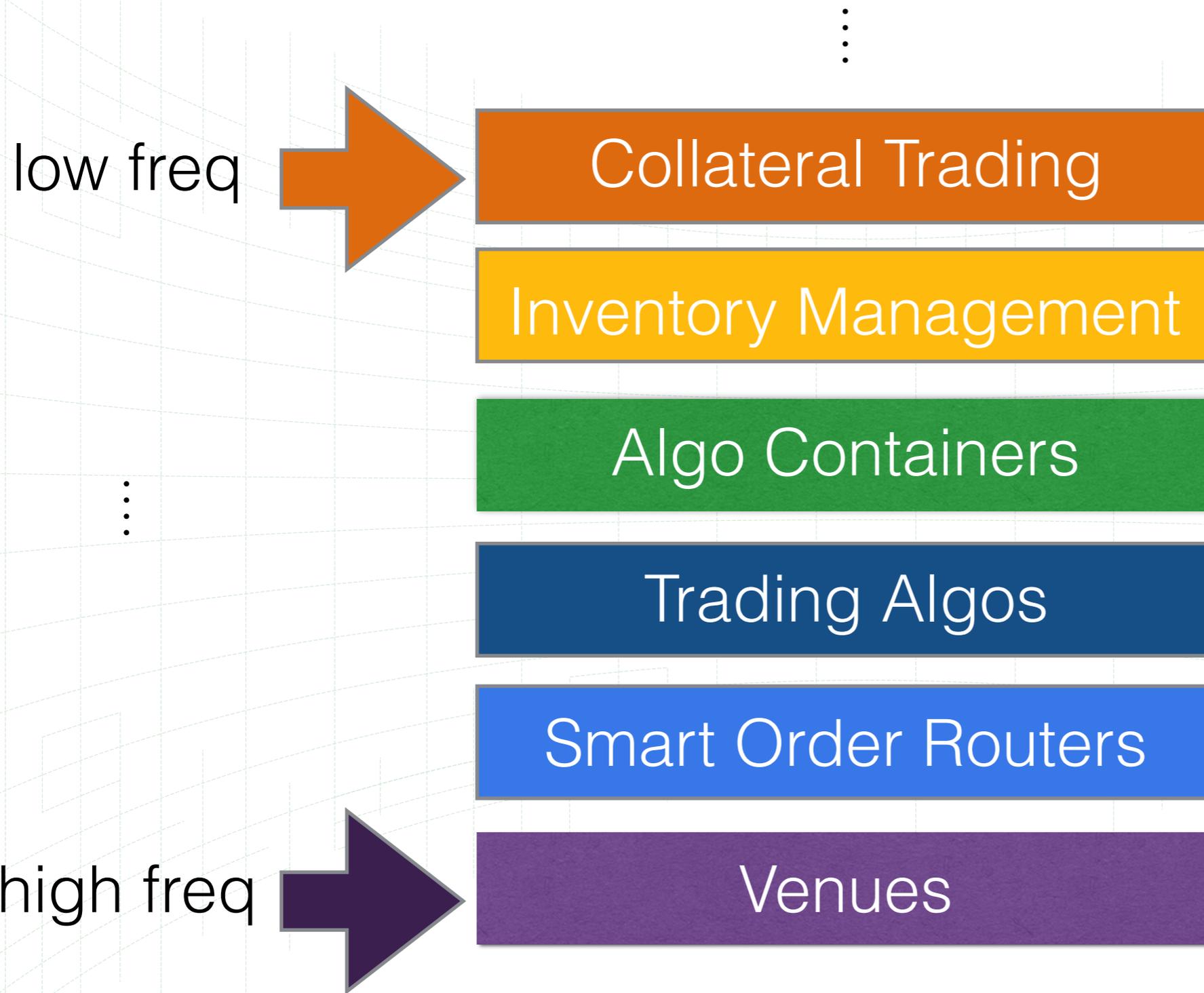
Algo Containers

Trading Algos

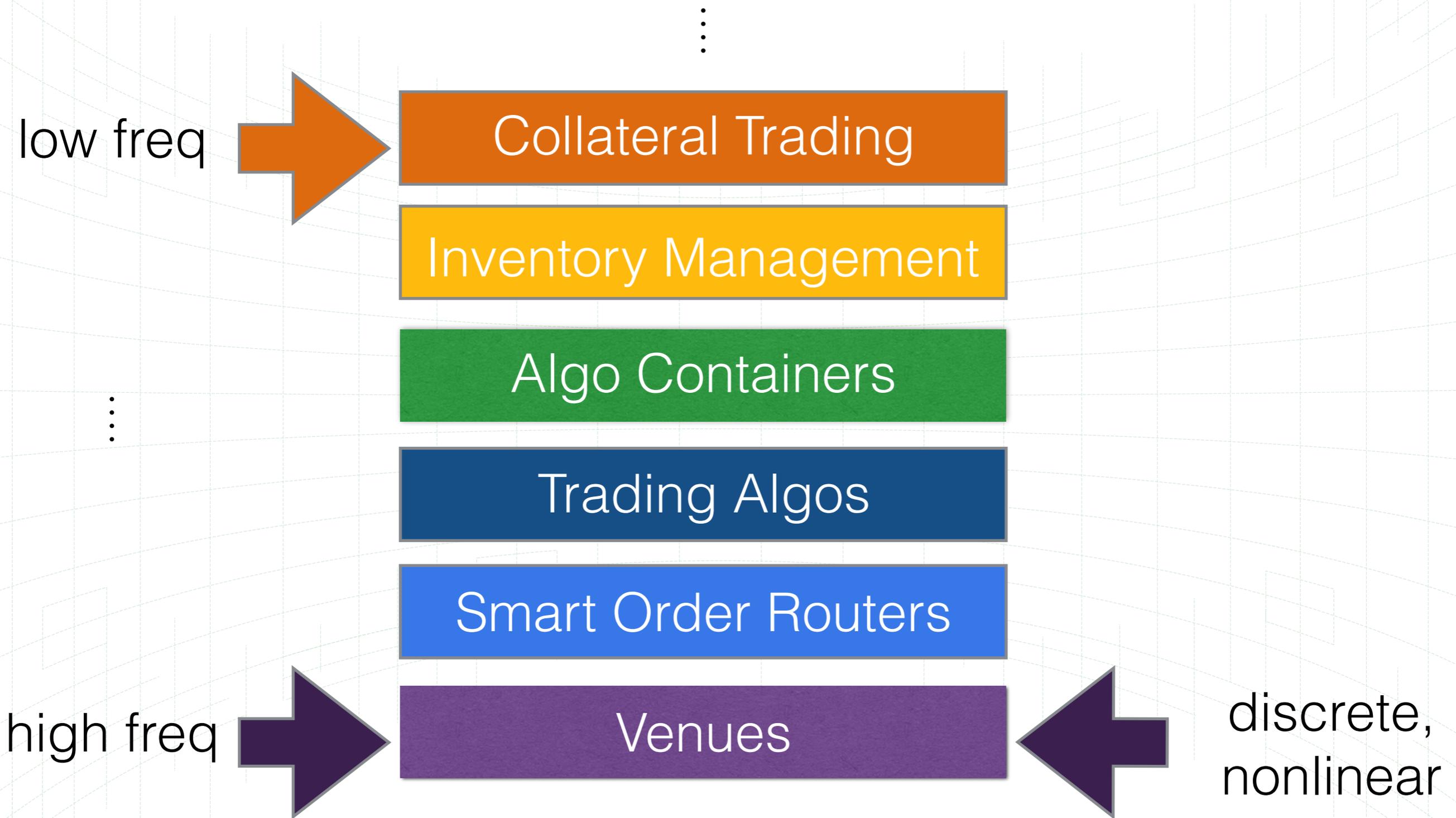
Smart Order Routers

Venues

# The Stack of Financial Algorithms



# The Stack of Financial Algorithms





# What is a venue?



**London**  
Stock Exchange



# What is a venue?



**London**  
Stock Exchange



**Turquoise**



Swiss Exchange

# What is a venue?



**London**  
Stock Exchange



**Turquoise**



Swiss Exchange



**Morgan**  
Stanley



**UBS**

**Goldman**  
Sachs

# What is a venue?



London  
Stock Exchange



NYSE



Nasdaq

# LIT LIQUIDITY



Making Markets Better



Swiss Exchange

# DARK LIQUIDITY

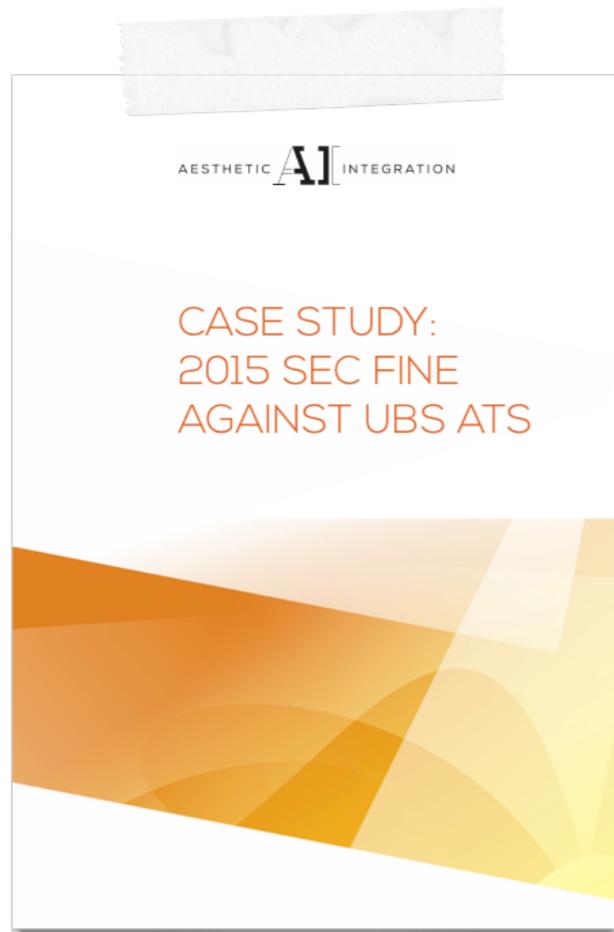
# Running Example: UBS ATS



620 companies  
52 countries



# Running Example: UBS ATS



620 companies  
52 countries

Jan, 2015: UBS fined **\$14M** by the SEC for issues of unfairness in their dark pool design



We analysed it, found more issues



# Running Example: UBS ATS



Form ATS Page 1 Execution Page	UNITED STATES SECURITIES AND EXCHANGE COMMISSION WASHINGTON, D.C. 20549 <b>INITIAL OPERATION REPORT, AMENDMENT TO INITIAL OPERATION REPORT AND CESSATION OF OPERATIONS REPORT FOR ALTERNATIVE TRADING SYSTEMS</b>	Date filed (MM/DD/YY): <b>6/1/15</b>	OFFICIAL USE ONLY
<p>WARNING: Failure to keep this form current and to file accurate supplementary information on a timely basis, or the failure to keep accurate books and records or otherwise to comply with the provisions of law applying to the conduct of alternative trading systems would violate the federal securities laws and may result in disciplinary, administrative or criminal action.</p> <p>INTENTIONAL MISSTATEMENTS OR OMISSIONS OF FACTS MAY CONSTITUTE CRIMINAL VIOLATIONS</p> <p><input type="checkbox"/> INITIAL OPERATION REPORT    <input checked="" type="checkbox"/> AMENDMENT TO INITIAL OPERATION REPORT    <input type="checkbox"/> CESSATION OF OPERATIONS REPORT</p>			
<p>1. Exact name, principal business address, mailing address, if different, and telephone number of alternative trading system:</p> <p>A. Full name of alternative trading system (if sole proprietor, last, first and middle name): UBS ATS</p> <p>B. Name(s) of U.S. person(s) who own, control, or exercise a controlling influence over the alternative trading system: UBS Securities</p> <p>C. CRD Number</p> <p>E. If this filing is an amendment, specify why and the date of the previous filing. Previous filing</p> <p>F. Alternative trading system address: 1285 Avenue</p> <p>G. Mailing address</p> <p>H. Business telephone and facsimile number: _____ (Telephone) (Facsimile)</p> <p>I. Contact employee: _____ (Name and Title) (Telephone Number) (Facsimile)</p>			
<p><b>EXECUTION:</b> The alternative trading system consents that service of any civil action brought by, or notice of any proceeding before, the SEC or a self-regulatory organization in connection with the alternative trading system's activities may be given by registered or certified mail or confirmed telegram, to the alternative trading system's contact employee at the main address, or mailing address if different given in Items 1F and 1G. The undersigned, being first duly sworn, deposes and says that he/she has executed this form on behalf of and with the authority of, said alternative trading system. The undersigned and alternative trading system represent that the information and statements contained herein, including exhibits, schedules, or other documents attached hereto, and other information filed herewith, all of which are made a part hereof, are current, true, and complete.</p> <p>Date: <u>06/01/2015</u> UBS ATS (Name of applicant)</p> <p>By: _____ (Printed Name and Title)</p> <p>Subscribed and sworn before me this <u>1</u> day of <u>June</u>, <u>2015</u> by _____ (Month) (Year)</p> <p>My Commission expires <u>21 Dec 2017</u> County of _____ State of _____</p> <p><i>This page must always be completed in full with original, manual signature and notarization. Affix notary stamp or seal where applicable.</i></p>			
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Let's examine an actual regulatory disclosure (esp. Sec 4.1)



DESIRÉE ANN PALOCIN  
NOTARY PUBLIC-STATE OF NEW YORK  
No. 019A6215204  
Qualified in New York County  
My Commission Expires December 21, 2017

# What is Imandra?

- Programming language
- Mathematical logic
- Reasoning engine

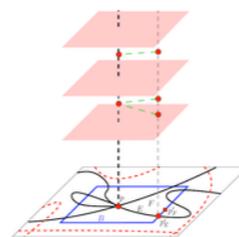


 IMANDRA

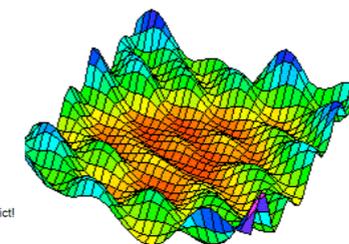
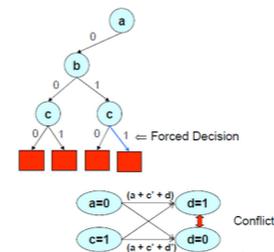
# What is Imandra?

 **OCaml** + Automated Reasoning

- Programming language
- Mathematical logic
- Reasoning engine
  - First-class counterexamples
  - Nonlinear + SE decomposition
  - Proof automation for various financial regulations
  - Test suite generation
  - Documentation generation



$(a' + b + c)$   
 $(a + c + d)$   
 $(a + c + d)$   
 $(a + c + d)$   
 $(b' + c + d)$   
 $(a' + b + c)$   
 $(a' + b + c)$



 **IMANDRA**

# What does a venue do?

- maintain an **order book**
- process incoming **orders**
- **match** orders ('trade'!)
- send **'fills'**
- route orders **away** ('best-ex')
- **report** on market activity

...all according to a (*precisely?*) defined 'spec'  
...while obeying many complex regulations

# What is an order book?



# What is an order book?



```
type order_book = { buys : order list;  
                    sells : order list }
```

# What is an order book?

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```

at each discrete time-step,  
the book is sorted.



# What is an order book?

```
type order_book = { buys : order list;  
                    sells : order list }
```

how is it sorted?

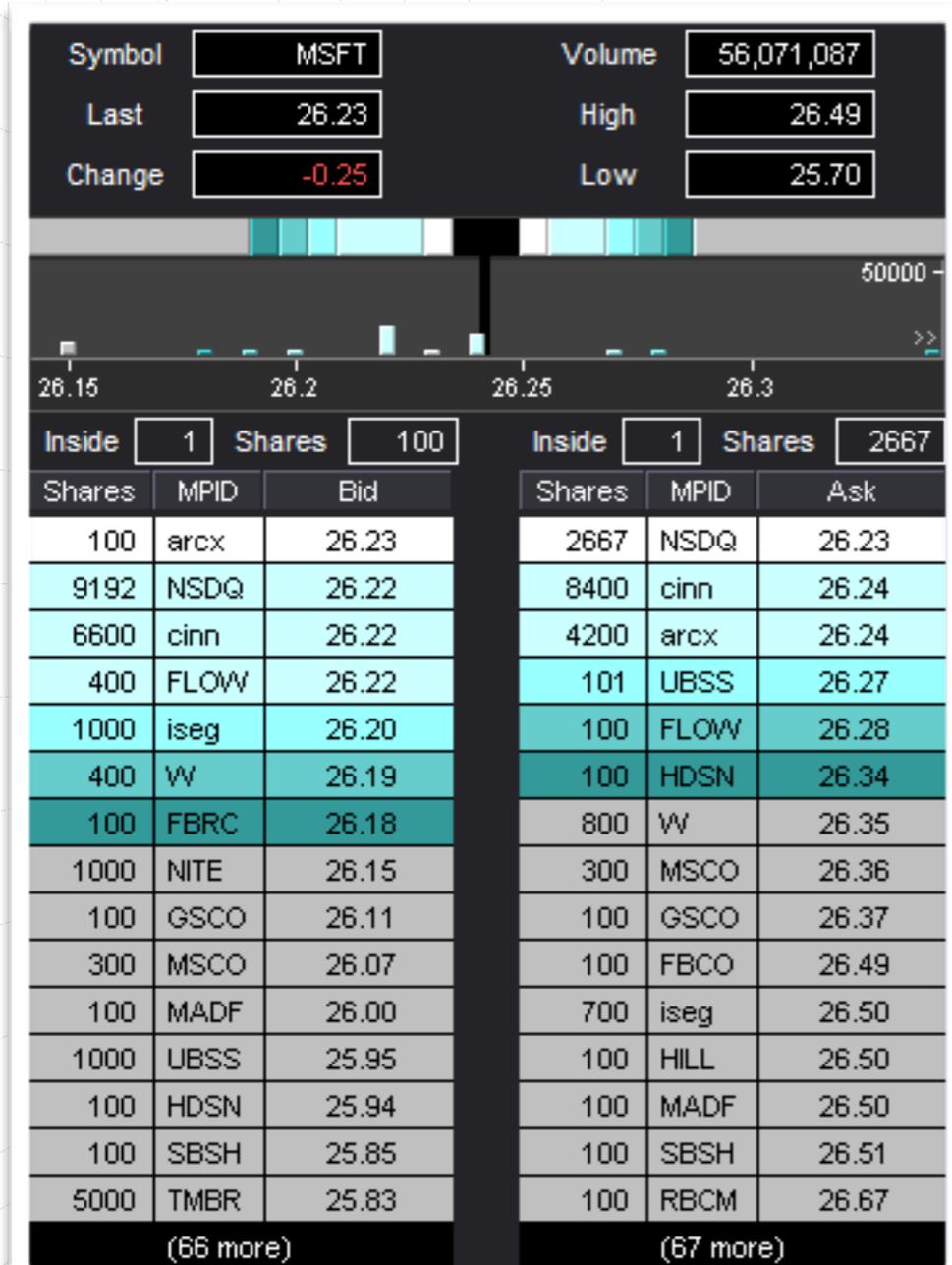
Inside 1 Shares 100			Inside 1 Shares 2667		
Shares	MPID	Bid	Shares	MPID	Ask
100	arcx	26.23	2667	NSDQ	26.23
9192	NSDQ	26.22	8400	cinn	26.24
6600	cinn	26.22	4200	arcx	26.24
400	FLOW	26.22	101	UBSS	26.27
1000	iseg	26.20	100	FLOW	26.28
400	WV	26.19	100	HDSN	26.34
100	FBRC	26.18	800	WV	26.35
1000	NITE	26.15	300	MSCO	26.36
100	GSCO	26.11	100	GSCO	26.37
300	MSCO	26.07	100	FBCO	26.49
100	MADF	26.00	700	iseg	26.50
1000	UBSS	25.95	100	HILL	26.50
100	HDSN	25.94	100	MADF	26.50
100	SBSH	25.85	100	SBSH	26.51
5000	TMBR	25.83	100	RBCM	26.67

# What is an order book?

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type order_book = { buys : order list;  
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how is it sorted?

VERY COMPLEX  
ANSWER!



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how is it sorted?

INTUITION:  
Price/Time Priority



# What is an order book?



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INTUITION:  
Price/Time Priority

REALITY:  
Let's see!

# What is an order?

an instruction to

- **buy or sell** a given security
- in a **specified manner**,
- subject to **market constraints**, and
- order **parameters**.

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“buy 100 shares of MSFT, with price at most \$50”

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- in a **specified manner**,
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- order **parameters**.

“buy 100 shares of MSFT, with price at most \$50”

“buy 100 shares of MSFT”

# What is an order?

```
o1 = { id = 437;
      peg = NEAR;
      client_id = 5;
      order_type = FIRM_UP_LIMIT;
      qty = 2438;
      min_qty = 60;
      leaves_qty = 0;
      price = 2533;
      time = 8857;
      src = 7;
      order_attr = RESIDENT;
      capacity = Principal;
      category = C_ONE;
      cross_restrict = { cr_self_cross = false;
                        cr_ubs_principal = false;
                        cr_round_lot_only = true;
                        cr_no_locked_nbbo = false;
                        cr_pegged_mid_point_mode = 3;
                        cr_enable_conditionals = true;
                        cr_min_qty = false;
                        cr_cat_elig = { c_one_elig = false;
                                       c_two_elig = false;
                                       c_three_elig = false;
                                       c_four_elig = false; }; };
      locate_found = false;
      expiry_time = 8; };
```

# What is an order type?

MARKET ORDER

# What is an order type?

MARKET ORDER

LIMIT ORDER

# What is an order type?

MARKET ORDER

LIMIT ORDER

ICEBERG ORDER

# What is an order type?

MARKET ORDER

LIMIT ORDER

ICEBERG ORDER

STOP LOSS ORDER

⋮

# What is an order type?

## Simplicity Is the Goal of Nasdaq's New Order Type, CEO Says

by Annie Massa  
[antoniabmassa](#)

August 15, 2016 – 11:26 PM CEST



- ▶ CEO Greifeld expects to release new order by end of year
- ▶ Makes an appeal to investors, as IEX prepares for exchange



Nasdaq Inc. is responding to a competitor preparing to enter the exchange arena.

**Start your day with what's moving markets.**

Get our markets daily newsletter.

Nasdaq plans to offer a new order type aimed at long-term investors, the company announced Monday.

The exchange operator expects to have the new order available for use by the end of year, said Nasdaq Chief

# What is an order type?

## Simplicity Is the Goal Nasdaq's New Order CEO Says

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## 'Hide Not Slide' Orders Were Slippery and Hidden

12 JAN 12, 2015 7:35 PM EST

By [Matt Levine](#)

Today, the Securities and Exchange Commission [fined the Direct Edge stock exchanges](#) \$14 million for violations involving their "Hide Not Slide" order types.<sup>1</sup> Here's a [2012 Wall Street Journal article](#) that comes with basically a graphic novel devoted to how a "Hide Not Slide" order works, and I refer you to there if you want to know how it works. The thing is that you probably don't want to know how it works. But here's the basic idea, without the cartoon of a jumping man in a suit:<sup>2</sup>

# What is an order type?

The image is a screenshot of a MarketWatch news article. At the top, the MarketWatch logo is displayed in white and green, with social media icons for Facebook, Twitter, LinkedIn, and Google+ to its right. A dark navigation bar contains a home icon and menu items: NEWS VIEWER, MARKETS, INVESTING, TRADING DECK, PERSONAL FINANCE, RETIREMENT, and ECONOMY. Below this, a breadcrumb trail reads 'Home > Economy & Politics'. The main headline is 'SEC fines exchange over 'queue-jumping' orders' in large, bold, dark blue font. Below the headline, it says 'Published: Jan 13, 2015 9:11 a.m. ET'. A row of social sharing icons (Facebook, Twitter, Google+, Email, and a comment icon with the number 2) is positioned below the publication date. A circular profile picture of a man with glasses is on the left side of the article text. The main text of the article begins with 'WASHINGTON (MarketWatch) – BATS Global Markets Inc. agreed to a \$14 million settlement with federal regulators over charges that two exchanges it acquired last year did not accurately describe order types to customers, officials said Monday.' Below the article text, there is a promotional banner for a newsletter. On the left side of the banner, it says 'Start your day with what's moving markets.' and 'Get our markets daily newsletter.' On the right side of the banner, it says 'Nasdaq plans to offer a new order type aimed at long-term investors, the company announced Monday. The exchange operator expects to have the new order available for use by the end of year, said Nasdaq Chief'. The entire screenshot is framed by a white border with a grid pattern.

MarketWatch

NEWS

NEWS VIEWER MARKETS INVESTING TRADING DECK PERSONAL FINANCE RETIREMENT ECONOMY

Home > Economy & Politics

## SEC fines exchange over 'queue-jumping' orders

Published: Jan 13, 2015 9:11 a.m. ET

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Get our markets daily newsletter.

# Is your venue fair?

## Difficult questions:

- Is your venue *fair*?
- Can you *prove* it?
- If it's not fair, how can you *fix* it?
- Can your collection of order-types ever *violate* regulatory directives?
- Does your high-performance *implementation* conform to your high-level design specification?
- Does your *documentation* of your order-types truly match your implementation?
- How can you *automate* both *testing* and *compliance*?
- What is the *strongest possible evidence* you can give to regulators?

THE WALL STREET JOURNAL. ≡



MARKETS

## BATS Faces Record SEC Fine Over Direct Edge's Actions

Regulator Near Settlement of Up to \$13 Million Over How the Exchange Handled Investors' Orders

By **SCOTT PATTERSON**

Dec. 4, 2014 6:35 p.m. ET

7 COMMENTS

WASHINGTON—A three-year investigation by market regulators into allegedly unfair treatment of investors by stock exchanges could result in the largest fine ever levied against a stock exchange, according to people familiar with the matter.

Securities and Exchange Commission investigators are nearing a settlement of about \$12 million to \$13 million with BATS Global Markets Inc. over how its Direct Edge Holdings LLC exchanges handled customer orders, these people said. The current record fine for an exchange came in May 2013, when [Nasdaq OMX Group Inc.](#) agreed to pay \$10 million to settle securities-law violations tied to its handling of the chaotic [Facebook Inc.](#) public offering a year earlier.



## Formal analysis of trading venues

- Analysis of safety and fairness properties of trading venues (dark pools, exchanges, etc.)
- In use at top global investment banks
- Principled way to manage growing order-type proliferation
- Exciting developments in regulatory space (more soon...!)

```
I (Quote, Limit) ->
  if bb.order_time > bs.order_time then
    (* incoming quote *)
    begin
      let nextSellLimit = next_sell s in
      if bb.order_qty < bs.order_qty then Known bs.order_price
      else if bb.order_qty = bs.order_qty then
        match nextSellLimit with
        | None      -> Known bb.order_price
        | Some ord  -> Known ord.order_price
      else Unknown
    end
  else
    (* existing quote's price is used *)
    Known bb.order_price

I (Quote, Market) ->
  if bb.order_time > bs.order_time then
    (* incoming quote *)
    begin
      let nextSellLimit = next_sell s in
      if bb.order_qty < bs.order_qty then Known bs.order_price
      else if bb.order_qty = bs.order_qty then
        match nextSellLimit with
        | None      -> Known bb.order_price
        | Some ord  -> Known ord.order_price
      else Unknown
    end
  else
    (* existing quote's price is used *)
    Known bb.order_price
```

# Running Example: UBS ATS



Demo:

Transitivity of  
order ranking

Form ATS  
Page 1  
Execution  
Page

UNITED STATES SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549  
INITIAL OPERATION REPORT, AMENDMENT TO INITIAL OPERATION REPORT AND  
CESSATION OF OPERATIONS REPORT FOR ALTERNATIVE TRADING SYSTEMS

Date filed  
(MM/DD/YY):  
6/1/15

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USE  
ONLY

WARNING: Failure to keep this form current and to file accurate supplementary information on a timely basis, or the failure to keep accurate books and records or otherwise to comply with the provisions of law applying to the conduct of alternative trading systems would violate the federal securities laws and may result in disciplinary, administrative or criminal action.  
INTENTIONAL MISSTATEMENTS OR OMISSIONS OF FACTS MAY CONSTITUTE CRIMINAL VIOLATIONS

INITIAL OPERATION REPORT  AMENDMENT TO INITIAL OPERATION REPORT  CESSATION OF OPERATIONS REPORT

1. Exact name, principal business address, mailing address, if different, and telephone number of alternative trading system:

A. Full name of alternative trading system (if sole proprietor, last, first and middle name):  
UBS ATS

B. Name(s) under which business is conducted, if different from Item 1A:  
UBS Securities LLC

C. CRD Number: 7854 D. SEC File No.: 8-22651

E. If this filing makes a name change on behalf of the alternative trading system, enter the previous name and specify whether the name change is of the \_\_\_\_\_ alternative trading system name (1A), or \_\_\_\_\_ business name (1B).  
Previous name: \_\_\_\_\_

F. Alternative trading system's main street address (Do not use a P.O. Box):  
1285 Avenue of the Americas, New York, NY 10019

G. Mailing address (if different):  
\_\_\_\_\_

H. Business telephone and facsimile number:  
\_\_\_\_\_  
(Telephone) (Facsimile)

I. Contact employee:  
\_\_\_\_\_  
(Name and Title) (Telephone Number) (Facsimile)

EXECUTION: The alternative trading system consents that service of any civil action brought by, or notice of any proceeding before, the SEC or a self-regulatory organization in connection with the alternative trading system's activities may be given by registered or certified mail or confirmed telegram, to the alternative trading system's contact employee at the main address, or mailing address if different given in Items 1F and 1G. The undersigned, being first duly sworn, deposes and says that he/she has executed this form on behalf and with the authority of said alternative trading system. The undersigned and alternative trading system represent that the information and statements contained herein, including exhibits, schedules, or other documents attached hereto, and other information filed herewith, all of which are made a part hereof, are current, true, and complete.

Date: 06/01/2015 UBS ATS (Name of applicant)

By: \_\_\_\_\_ (Printed Name and Title)

Subscribed and sworn before me this 1 day of June 2015 by \_\_\_\_\_ (Month) (Year)

My Commission expires 21 Dec 2017 County of \_\_\_\_\_ State of \_\_\_\_\_

This page must always be completed in full with original, manual signature and notarization.  
Affix notary stamp or seal where applicable.

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4

DEBBIE ANN MALOCIN  
NOTARY PUBLIC-STATE OF NEW YORK  
Qualification No. 01794215204  
My Commission Expires December 21, 2017

# Example: SIX Swiss Exchange

Trading Period Overview		Pre-Opening	Opening	Continuous Trading	End of Trading	
		06:00 CET until Opening	not applicable	Opening until End of Trading	Without Closing Auction	With Closing Auction
Duration		06:00 CET until Opening	not applicable	Opening until End of Trading	not applicable	10 Minutes
Random Time		not applicable	2 Minutes	not applicable	None	2 Minutes at Run Auction and Close
Order Entry	STI Orders	Day: Yes Immediate or Cancel: No Fill or Kill: No At the Opening: Yes At the Close: Yes	No	Yes	No	Yes
	OTI Orders	Day: Yes Immediate or Cancel: No Fill or Kill: No At the Opening: Yes At the Close: Yes	No	Yes	No	Yes
	QTI Quotes	Day: Yes Immediate or Cancel: No Fill or Kill: No At the Opening: Yes At the Close: Yes	No	Yes	No	Yes
	STI Orders	Day: Yes Immediate or Cancel: No Fill or Kill: No At the Opening: Yes At the Close: Yes	No	Order deletion of no execution	No	Order expiry after End of Trading
	OTI Orders	Day: Yes Immediate or Cancel: No Fill or Kill: No At the Opening: Yes At the Close: Yes	No	Order deletion of no execution	No	Order expiry after End of Trading
Order Duration & Expiry	STI Orders	Day: Yes Immediate or Cancel: No Fill or Kill: No At the Opening: Yes At the Close: Yes	Order expiry if not executed in Opening	No	No	Yes
	OTI Orders	Day: Yes Immediate or Cancel: No Fill or Kill: No At the Opening: Yes At the Close: Yes	Order expiry if not executed in Opening	Yes	No	Order expiry if not executed in Auction
	QTI Quotes	Day: Yes Immediate or Cancel: No Fill or Kill: No At the Opening: Yes At the Close: Yes	No	Yes	No	Yes
	STI Orders	Day: Yes Immediate or Cancel: No Fill or Kill: No At the Opening: Yes At the Close: Yes	No	Order deletion of no execution	No	Order expiry after End of Trading
	OTI Orders	Day: Yes Immediate or Cancel: No Fill or Kill: No At the Opening: Yes At the Close: Yes	No	Order deletion of no execution	No	Order expiry after End of Trading
Executions	No	Executions according to largest best execution principle	Continuous execution of orders and quotes	No	At Run Auction and Close Executions according to largest best execution principle	
Price Calculation	Theoretical Opening Price	Opening Price	Reference Price	Closing Price	Closing Price	
Exceptional Order Book Situations	None	Delay Opening Non Opening	Stop Trading Non Opening Underlying Condition	None	Non Opening	
Off Order Book Reporting	Yes Limit to trade on order book not applicable	Yes Observe "Limit to trade on order book" where applicable	Yes Observe "Limit to trade on order book" where applicable	Yes Observe "Limit to trade on order book" where applicable	Yes Observe "Limit to trade on order book" where applicable	

		Pre-Opening
Order Entry	Duration	06:00 CET until Opening
	Random Time	not applicable
Order Entry	STI Orders	Day: Yes Immediate or Cancel: No Fill or Kill: No At the Opening: Yes At the Close: Yes Good for Date: Yes
	OTI Orders	Day: Yes Immediate or Cancel: No Fill or Kill: No At the Opening: Yes At the Close: Yes
	QTI Quotes	Day: Yes Immediate or Cancel: No Fill or Kill: No At the Opening: Yes At the Close: Yes
	STI Orders	Day: Yes Immediate or Cancel: No Fill or Kill: No At the Opening: Yes At the Close: Yes Good for Date: Yes
	STI Orders	Day: Yes Immediate or Cancel: No Fill or Kill: No At the Opening: Yes At the Close: Yes Good for Date: Yes

# Pricing Logic: Informal

## 5. Example: Execution of an incoming quote in order book at best quote or at best remaining limit when quote volume < bid/ask volume and book contains limit orders and quotes.

Example 5.1: Incoming quote, buy 550 units, limit CHF 75.00

Type	Bid Size	Bid	Ask	Ask Size	Type
→ Quote	550	75.00	71.00	200	Order
			72.00	200	Order
			73.00	100	Quote
			74.00	100	Order

Type	Bid Size	Price	Ask Size	Type
→ Quote	550	75.00		
		74.00	100	Order
		73.00	100	Quote
		72.00	200	Order
		71.00	200	Order

# Pricing Logic: Formal

```
let match_price (s : exchange_state) =
  let bb = best_buy s in
  let bs = best_sell s in
  match bb, bs with
  | Some bb, Some bs ->
  begin
    match bb.order_type, bs.order_type with
    | (Limit, Limit) ->
      Known (older_price (bb, bs))
    | (Quote, Quote) ->
      Known (older_price (bb, bs))
    | (Market, Market) ->
      if bb.order_qty < bs.order_qty then Unknown
      else
        (* need to look at other orders in the order book *)
        let bestBuy = next_buy s in
        let bBid =
          match bestBuy with
          | Some bestBuy ->
            if bestBuy.order_type = Market then None
            else Some bestBuy.order_price
          | _ -> None in
        let bestSell = next_sell s in
        let bAsk =
          match bestSell with
          | Some bestSell ->
            if bestSell.order_type = Market then None
            else Some bestSell.order_price
          | _ -> None in
        begin
          match bBid, bAsk with
          | (None, None) -> Known s.ref_price
          | (None, Some ask) ->
            if ask < s.ref_price then Known ask
            else Known s.ref_price
          | (Some bid, None) ->
            if bid > s.ref_price then Known bid
            else Known s.ref_price
          | (Some bid, Some ask) ->
            if bid > s.ref_price then Known bid
            else
              if ask < s.ref_price then Known ask
              else Known s.ref_price
        end
      end
    | (Market, Limit) -> Known bs.order_price
    | (Limit, Market) -> Known bb.order_price
  | (Quote, Limit) ->
    if bb.order_time > bs.order_time then
      (* incoming quote *)
      begin
        let nextSellLimit = next_sell s in
        if bb.order_qty < bs.order_qty then Known bs.order_price
        else if bb.order_qty = bs.order_qty then
          match nextSellLimit with
          | None -> Known bb.order_price
          | Some ord -> Known ord.order_price
        else Unknown
      end
    else
      (* existing quote's price is used *)
      Known bb.order_price
  | (Quote, Market) ->
    if bb.order_time > bs.order_time then
      (* incoming quote *)
      begin
        let nextSellLimit = next_sell s in
        if bb.order_qty < bs.order_qty then Known bs.order_price
        else if bb.order_qty = bs.order_qty then
          match nextSellLimit with
          | None -> Known bb.order_price
          | Some ord -> Known ord.order_price
        else Unknown
      end
    else
      (* existing quote's price is used *)
      Known bb.order_price
end
```

```
| (Quote, Limit) ->
  if bb.order_time > bs.order_time then
    (* incoming quote *)
    begin
      let nextSellLimit = next_sell s in
      if bb.order_qty < bs.order_qty then Known bs.order_price
      else if bb.order_qty = bs.order_qty then
        match nextSellLimit with
        | None -> Known bb.order_price
        | Some ord -> Known ord.order_price
      else Unknown
    end
  else
    (* existing quote's price is used *)
    Known bb.order_price
| (Quote, Market) ->
  if bb.order_time > bs.order_time then
    (* incoming quote *)
    begin
      let nextSellLimit = next_sell s in
      if bb.order_qty < bs.order_qty then Known bs.order_price
      else if bb.order_qty = bs.order_qty then
        match nextSellLimit with
        | None -> Known bb.order_price
        | Some ord -> Known ord.order_price
      else Unknown
    end
  else
    (* existing quote's price is used *)
    Known bb.order_price
```

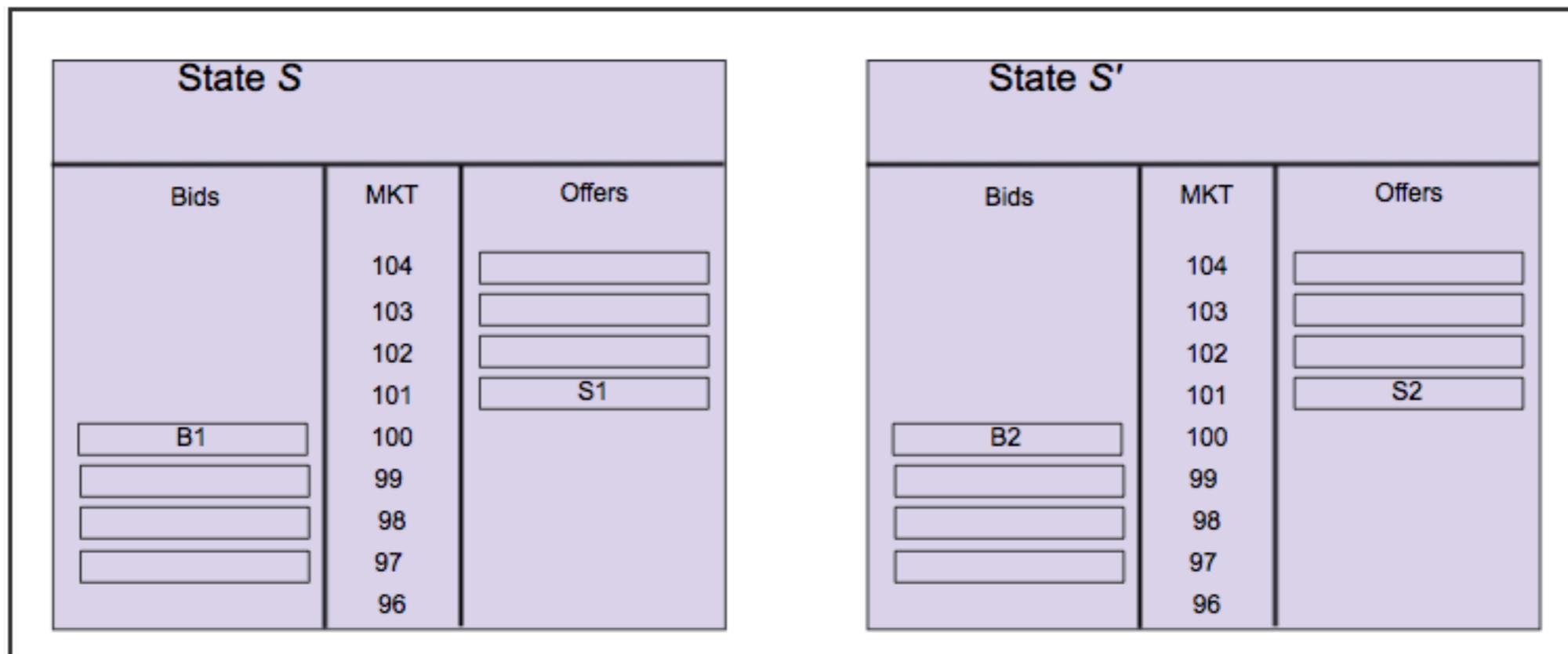
# Pricing Fairness Example

- Consider specification of the SIX Swiss matching logic - we will prove that client ID, although used by the system, does not factor into pricing and matching decisions
- We will use IML to encode both the matching logic and the fairness principle, and then use Imandra to reason about the model
- Our example highlights iterative nature of the specification process: We discover, through a non-trivial counter-example, that our original hypothesis is incorrect. We then update our specification or model accordingly and iterate.

# Pricing Fairness Example

- The following is an overview of the SIX Swiss Matching Engine
- Three market models: CLOB, MMB, and MMB-FoK
- Six business periods, 5 order types with numerous attributes
- 22 product types across equities, bonds, funds, and structured products with specific trading parameters
- Randomised auction times, volatility circuit breakers, order validities, and regulatory reporting requirements
- Complexity stems from the need to meet diverse client needs while operating a heavily regulated business

# Pricing Fairness Example

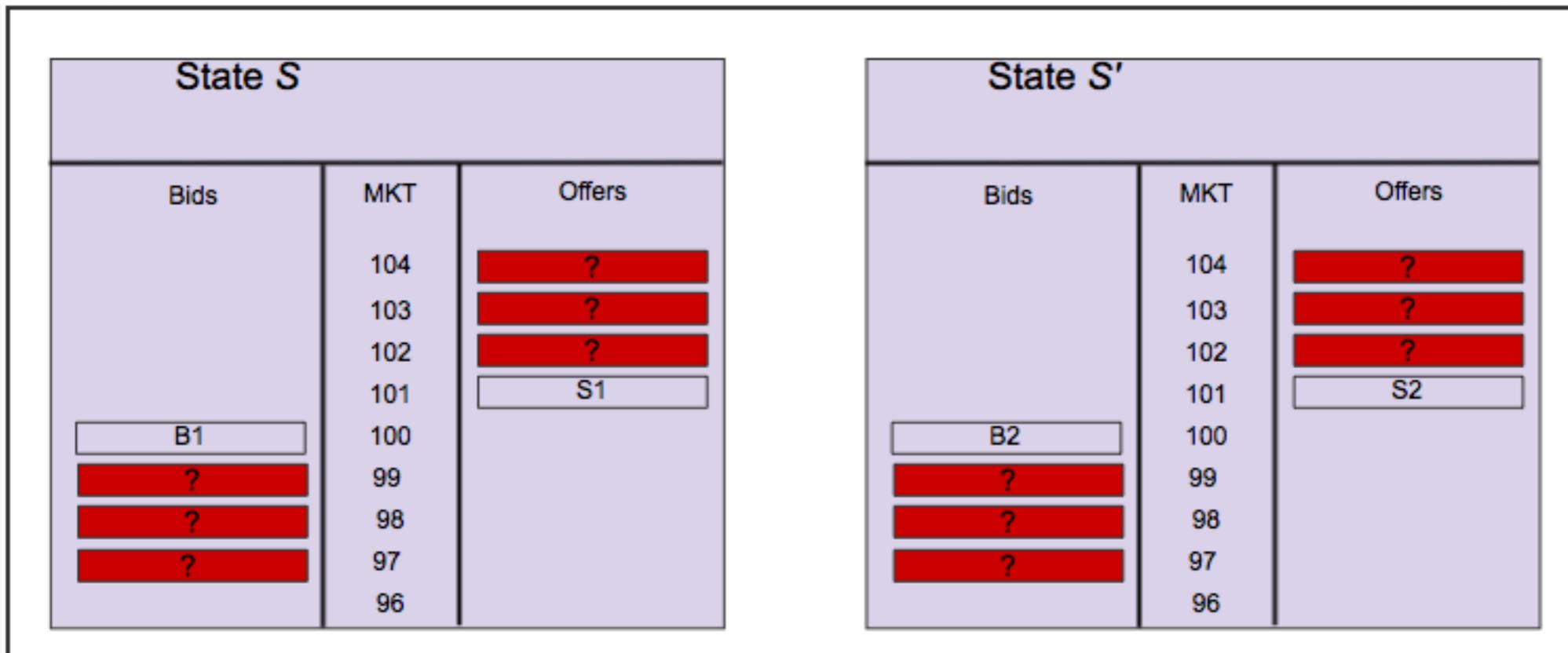


- $B_1 == B_2$  except Client ID
- $S_1 == S_2$  except Client ID



$$\text{MatchPrice}(S) = \text{MatchPrice}(S')$$

# Pricing Fairness Example

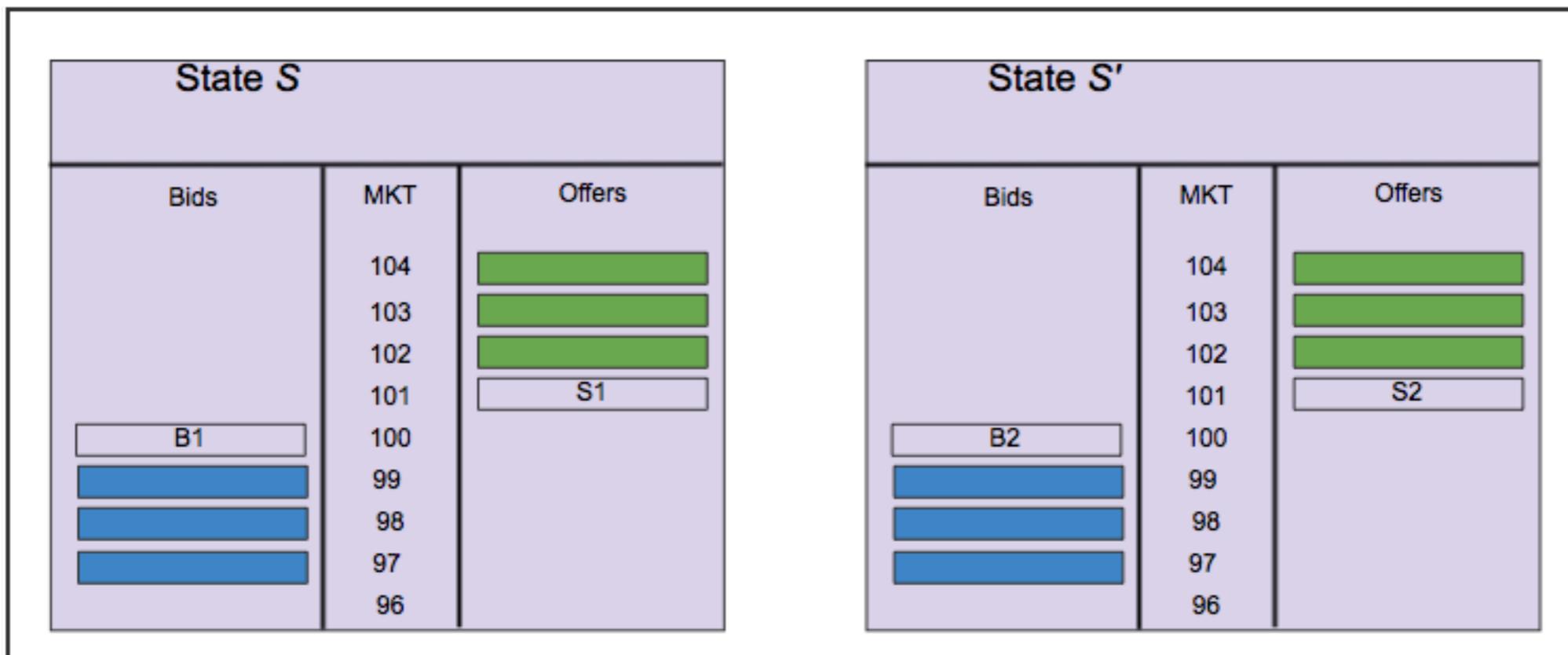


- $B_1 == B_2$  except Client ID
- $S_1 == S_2$  except Client ID

NO →

MatchPrice(S) = MatchPrice(S')

# Pricing Fairness Example



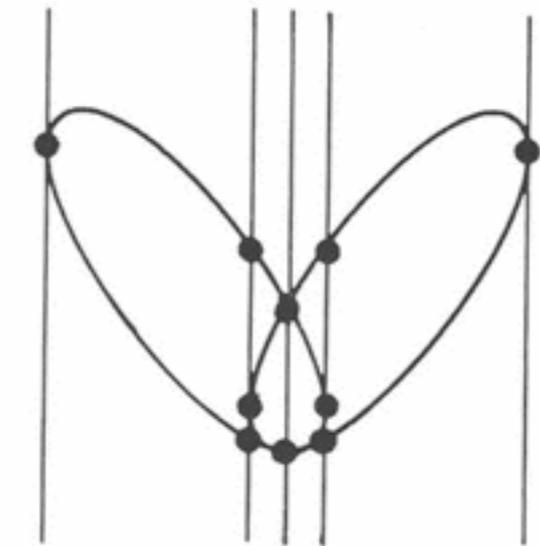
- $B_1 == B_2$  except Client ID
- $S_1 == S_2$  except Client ID

YES  
→

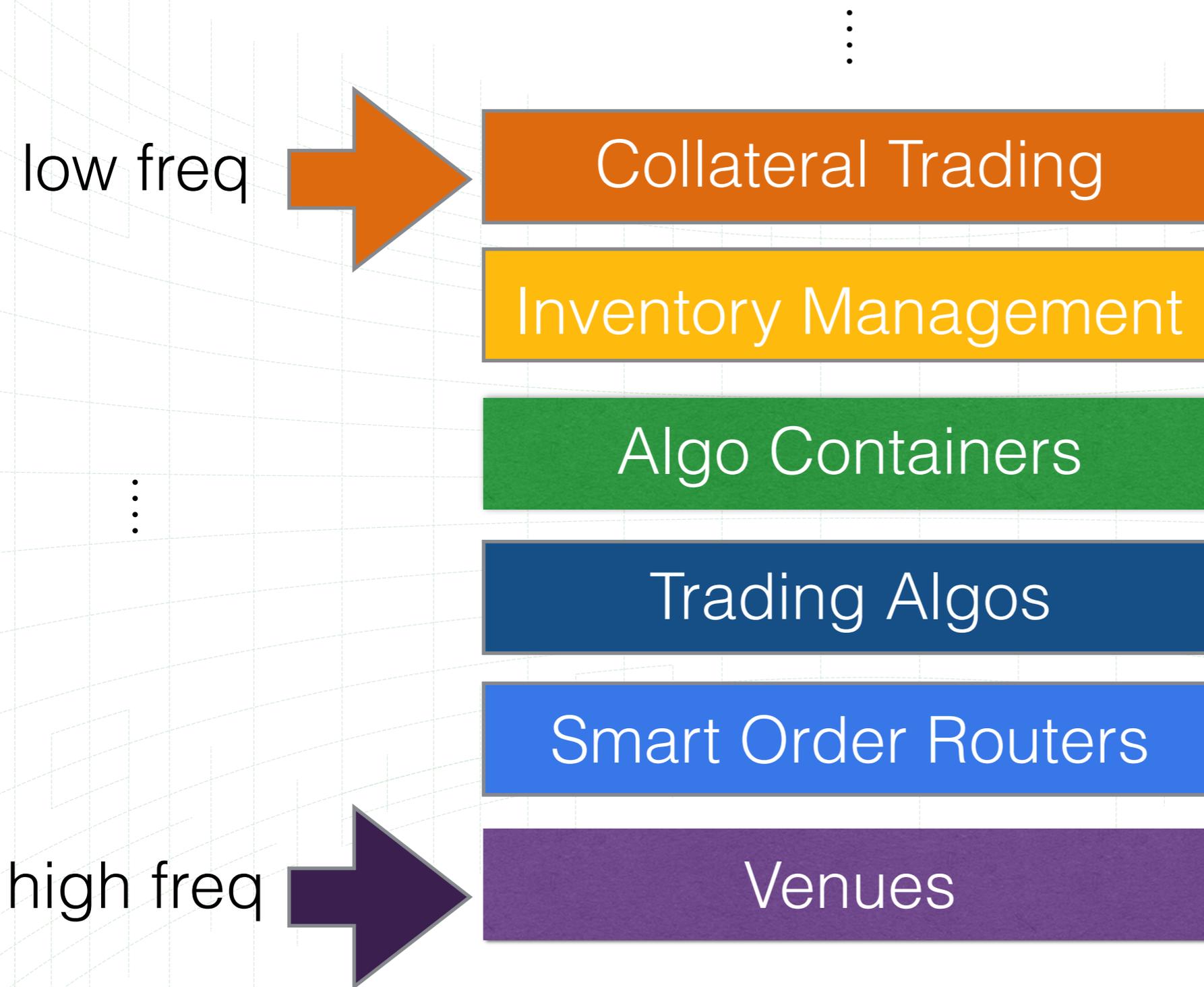
MatchPrice(S) = MatchPrice(S')

# Principal Region Decomposition

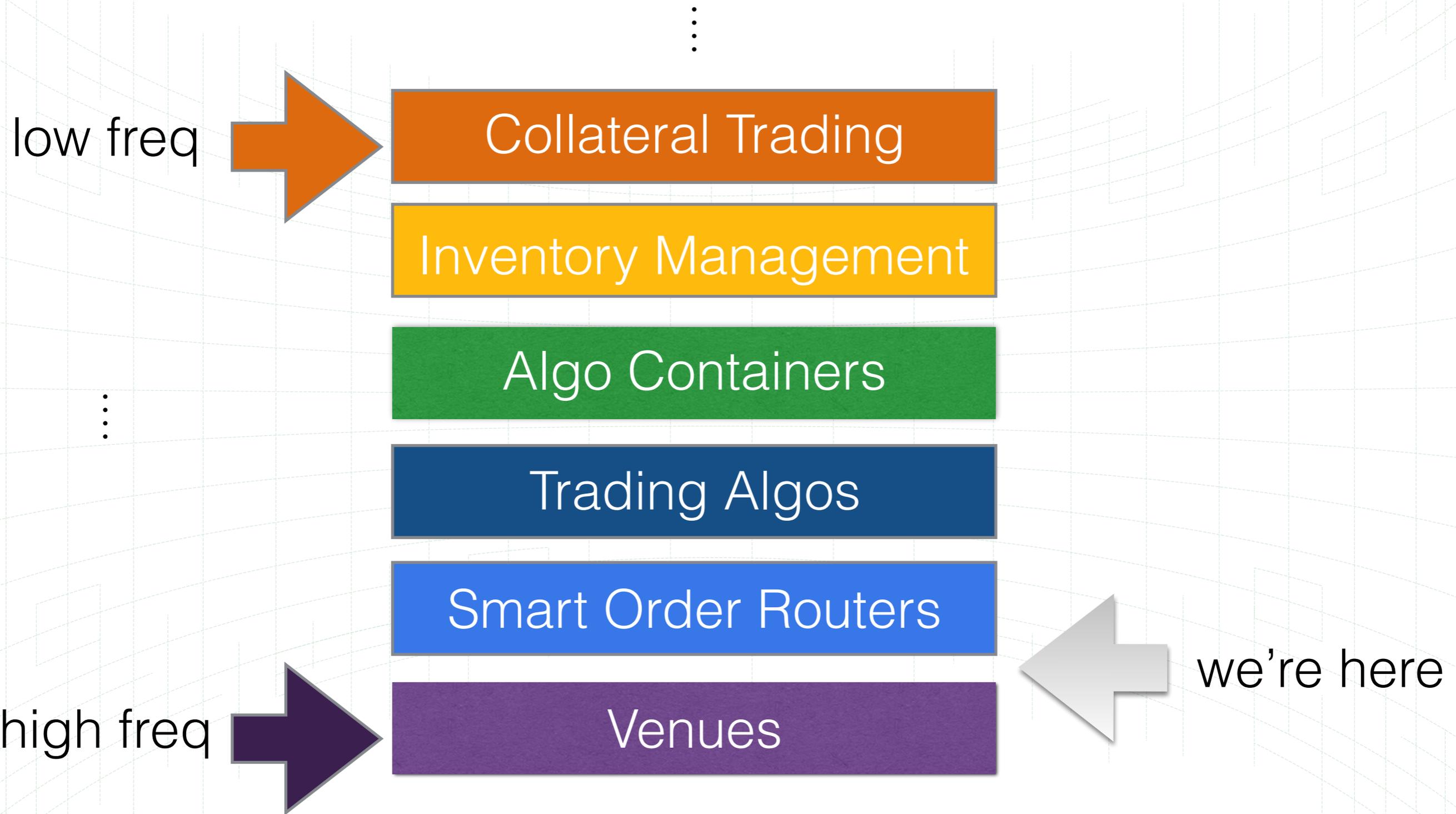
- symbolic execution modulo nonlinear sign-invariance
- intuitively, a generalisation of *cylindrical algebraic decomposition* to programs
- the basis of IMANDRA's test-suite and documentation generation



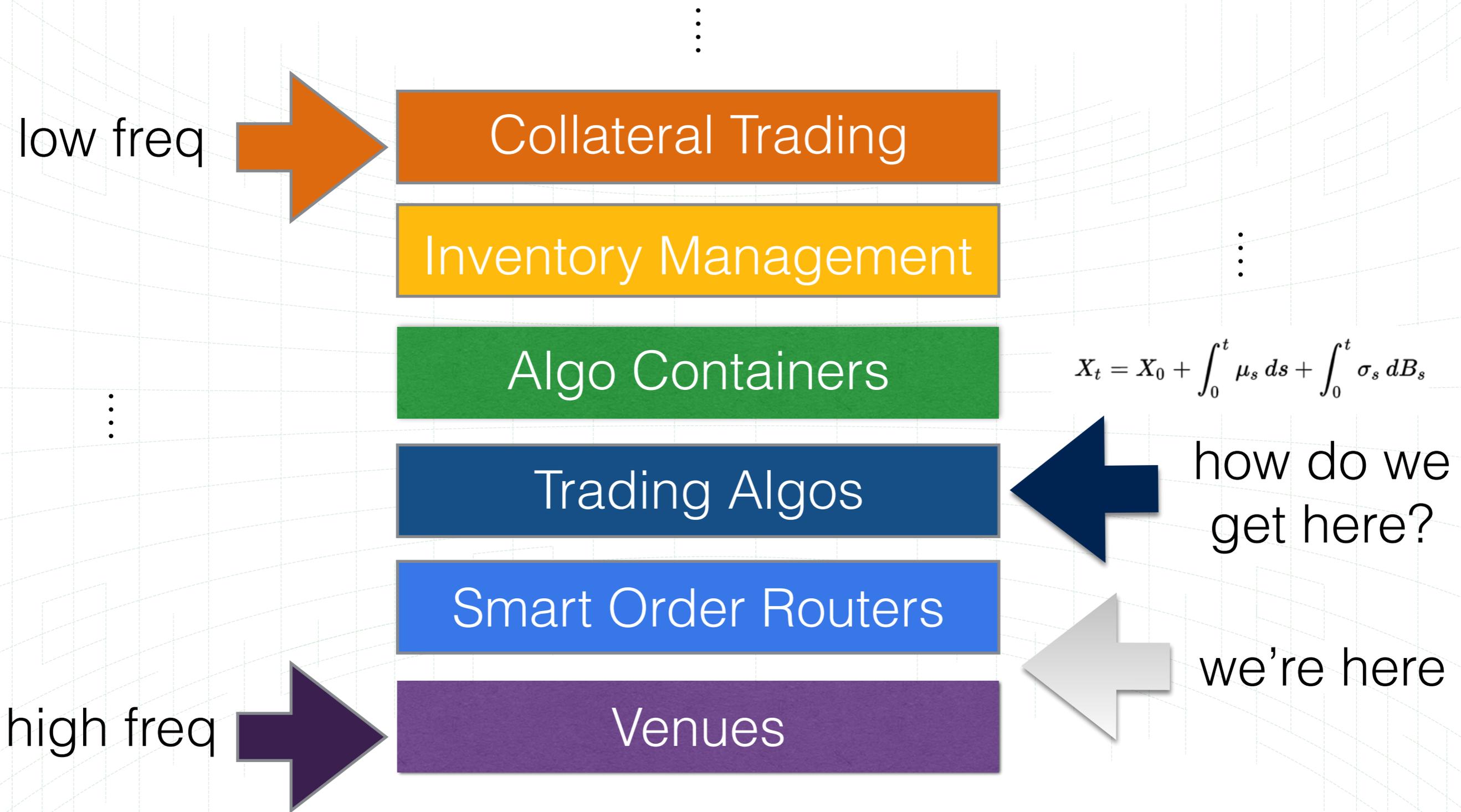
# The Stack of Financial Algorithms



# The Stack of Financial Algorithms



# The Stack of Financial Algorithms



# Formalized Financial Mathematics

$$dX(t) = rX(t) dt + \sigma X(t) dB(t).$$
$$p(\tau; x, y) = \frac{1}{\sigma y \sqrt{2\pi\tau}} \exp \left\{ -\frac{1}{2\tau\sigma^2} \left[ \log \frac{y}{x} - (r - \frac{1}{2}\sigma^2)\tau \right]^2 \right\}.$$

Assuming every order is a MARKET ORDER is ridiculous.  
We need *new* financial mathematics that takes the precise discrete market microstructure into account.

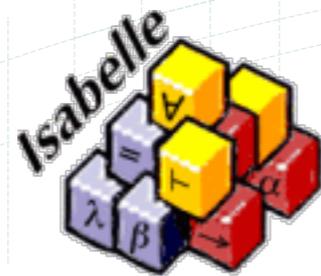
# Formalized Financial Mathematics

$$dX(t) = rX(t) dt + \sigma X(t) dB(t).$$
$$p(\tau; x, y) = \frac{1}{\sigma y \sqrt{2\pi\tau}} \exp \left\{ -\frac{1}{2\tau\sigma^2} \left[ \log \frac{y}{x} - (r - \frac{1}{2}\sigma^2)\tau \right]^2 \right\}.$$

Assuming every order is a MARKET ORDER is ridiculous.

We need *new* financial mathematics that takes the precise discrete market microstructure into account.

⋮



- Stochastic Control
- Stochastic Calculus
- Brownian Motion
- Wiener Processes
- Martingales

# Conclusion

- Pressing need for:
  - venues to be bullet-proof w.r.t. safety and fairness regulations
  - matching logics to be formally described to regulators and market participants
  - matching logics to be formally analysed w.r.t. precise encodings of regulatory directives
  - financial mathematics (stochastic calculus) that takes precise discrete behaviour of matching logics into account
  - this is a **killer app** for formal methods!