



MIAX Options Exchange Regulatory Circular 2025-64
MIAX Emerald Options Exchange Regulatory Circular 2025-63

DATE: August 29, 2025

TO: MIAX Options and MIAX Emerald Options Exchange Members

FROM: MIAX Regulatory Department

RE: Member Guidance Regarding Order Unbundling

Notwithstanding any prior understanding regarding the splitting of parent orders into child orders across multiple exchanges, MIAX Regulatory would like to clarify that the unbundling of orders, for the purpose of achieving small order preference as described in MIAX Options Rule 514(g)(2) and Emerald Options Rule 514(g)(2) in favor of any PLMM or as described in MIAX Options Rule 514(h) and Emerald Options Rule 514(h) for an LMM, may be considered conduct inconsistent with just and equitable principles of trade and a violation of MIAX Options Rule 301.

Similarly, in accordance with Rule 515A, MIAX Price Improvement Mechanism ("PRIME") and PRIME Solicitation Mechanism, Interpretations and Policies: .01 it shall be considered conduct inconsistent with just and equitable principles of trade, in accordance with Rule 301, for any Member to enter orders, quotes, Agency Orders, or other responses for the purpose of disrupting or manipulating the Auction. Such conduct includes, but is not limited to, submitting unrelated orders that cause an Auction to conclude before the end of the RFR period and where the Member submitting the Agency Order into the PRIME breaks up the Agency Order into separate orders for two (2) or fewer contracts for the purpose of gaining a higher allocation percentage than the Member would have otherwise received in accordance with the allocation procedures.

Again, MIAX would like to emphasize, that order unbundling across multiple exchanges to achieve higher allocations as described above, utilizing one or more of the Exchange enhanced allocation and or minimum allocation guarantees, as well as order unbundling on the Exchange, may be considered violative behavior.

Examples:

Originating Parent Order of <u>30 Contracts</u> to BUY									
Date	Time	Option	Qty	Price	Exchange	Exchange Best Offer	Exchange BO Size	National Best Offer	Traded Against
8/28/2025	13:44:55:015	ABC Sep19 35 C	5	7.35	Exchange 1	7.35	45	7.35	ABC Trading
8/28/2025	13:44:55:015	ABC Sep19 35 C	5	7.35	Exchange 2	7.35	68	7.35	ABC Trading
8/28/2025	13:44:55:015	ABC Sep19 35 C	5	7.35	Exchange 3	7.35	35	7.35	ABC Trading
8/28/2025	13:44:55:015	ABC Sep19 35 C	5	7.35	Exchange 4	7.35	92	7.35	ABC Trading
8/28/2025	13:44:55:015	ABC Sep19 35 C	5	7.35	Exchange 5	7.35	25	7.35	ABC Trading
8/28/2025	13:44:55:015	ABC Sep19 35 C	5	7.35	Exchange 6	7.35	57	7.35	ABC Trading



Originating Parent Order of <u>10 Contracts</u> to BUY									
Date	Time	Option	Qty	Price	Exchange	Exchange Best Offer	Exchange BO Size	National Best Offer	Traded Against
8/28/2025	11:58:34:792	ABC Sep19 50 C	1	0.25	Exchange 1	0.25	510	0.25	ABC Trading
8/28/2025	11:58:34:792	ABC Sep19 50 C	1	0.25	Exchange 2	0.25	15	0.25	ABC Trading
8/28/2025	11:58:34:792	ABC Sep19 50 C	1	0.25	Exchange 3	0.25	175	0.25	ABC Trading
8/28/2025	11:58:34:792	ABC Sep19 50 C	1	0.25	Exchange 4	0.25	765	0.25	ABC Trading
8/28/2025	11:58:34:792	ABC Sep19 50 C	1	0.25	Exchange 5	0.25	490	0.25	ABC Trading
8/28/2025	11:58:34:792	ABC Sep19 50 C	1	0.25	Exchange 6	0.25	1175	0.25	ABC Trading
8/28/2025	11:58:34:792	ABC Sep19 50 C	1	0.25	Exchange 7	0.25	110	0.25	ABC Trading
8/28/2025	11:58:34:792	ABC Sep19 50 C	1	0.25	Exchange 8	0.25	805	0.25	ABC Trading
8/28/2025	11:58:34:792	ABC Sep19 50 C	1	0.25	Exchange 9	0.25	75	0.25	ABC Trading
8/28/2025	11:58:34:792	ABC Sep19 50 C	1	0.25	Exchange 2	0.25	15	0.25	ABC Trading

Originating Parent Order of <u>20 Contracts</u> to SELL									
Date	Time	Option	Qty	Price	Exchange	Exchange Best Bid	Exchange BB Size	National Best Bid	Traded Against
8/28/2025	10:35:22:759	ABC Sep19 40 C	1	2.25	Exchange 1	2.25	53	2.25	ABC Trading
8/28/2025	10:35:22:759	ABC Sep19 40 C	5	2.25	Exchange 2	2.25	45	2.25	ABC Trading
8/28/2025	10:35:22:759	ABC Sep19 40 C	1	2.25	Exchange 3	2.25	85	2.25	ABC Trading
8/28/2025	10:35:22:759	ABC Sep19 40 C	1	2.25	Exchange 4	2.25	110	2.25	ABC Trading
8/28/2025	10:35:22:759	ABC Sep19 40 C	5	2.25	Exchange 5	2.25	275	2.25	ABC Trading
8/28/2025	10:35:22:759	ABC Sep19 40 C	1	2.25	Exchange 6	2.25	350	2.25	ABC Trading
8/28/2025	10:35:22:759	ABC Sep19 40 C	5	2.25	Exchange 7	2.25	525	2.25	ABC Trading
8/28/2025	10:35:22:759	ABC Sep19 40 C	1	2.25	Exchange 8	2.25	62	2.25	ABC Trading

MIAX Regulatory is not implying that a larger order can never be split into multiple child orders and acknowledges that there may be circumstances for order flow providers to split a parent order into multiple child orders across various market centers to provide the highest level of execution quality.

Please direct questions to the Regulatory Department at Regulatory@miaxglobal.com or (609) 897-7309.