Dear CPMI and IOSCO Secretariats,

Thank you for publishing ‘Guidance on cyber resilience for financial market infrastructures’ for Financial Markets Infrastructures (FMI), such as Abide Financial Repository Limited, to consider and extend their existing cyber security provisions. The document structure and topics cover the areas of focus each FMI cyber resilience strategy needs to contemplate in order to succeed.

Abide Financial Repository Limited (AFRL), a Trade Repository (TR) applicant pending EMIR registration, positions the TR as an FMI as defined in the PFMI target group. AFRL will collaborate with the other EMIR-registered TRs, ESMA, EU competent authorities, our EU reporting clients and our third party vendors to further develop our testing and situational awareness, with the goal of sharing with and learning from AFRL's ecosystem. AFRL has completed an internal review of our policies, procedures and processes to ensure we include all the cyber resilience principles discussed in the guidance.

As CPMI-IOSCO continues to develop principles-based guidance for both cloud-based (such as ourselves) and non-cloud FMI, please let us know if we can be a resource to the endeavour. Along these lines, if there are opportunities for AFRL to actively participate in industry working groups or working sessions please let us know.

Kind Regards,

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