

## **Systematic Internaliser Policy**

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## 1. Purpose

Where Standard Chartered Bank AG ('SCB AG') is acting as a systematic internaliser ('SI') in accordance with MiFID II/MiFIR SCB AG it is required, subject to certain conditions, to publish firm quotes. Where SCB AG operates as an SI it can be identified by the Market Identifier Code (MIC): **SCAG**. This Policy applies to such activity in 'Non-Equity Instruments' being bonds, derivatives and structured finance products that are traded on an EU trading venue (TOTV).

If you are a client of SCB AG and wish to trade against a firm quote in a Non-Equity Instrument that SCB AG has published, you may request to do so. However, to determine whether you are in fact able to trade against a particular quote the SCB AG may apply its 'commercial policy', which is made up of the factors set out in Section 3 below.

## 2. Definition of Firm Quotes

Firm quotes are executable prices provided by any means (voice, chat or electronic) by an SI outside of an EU trading venue on a given financial instrument that guarantees a bid or ask price up to the amount quoted, without negotiation. Indicative quotes that are provided for information but that are not actionable are not firm quotes and therefore are not published or otherwise communicated to clients other than the client for which it is intended.

Note that the SCB AG is only required to publish or to give access to quotes where:

- SCB AG is a SI on the Non-Equity Instrument either due to its activities reaching the SI determination thresholds or because it opted-in for the SI regime on a voluntarily basis;
- SCB AG is prompted for a quote by a client outside a trading venue and agrees to provide a firm quote;
- The transaction for which SCB AG provide the firm quote is not exempted for the purposes of MiFIR pre-trade transparency (e.g. certain central banks transactions);
- The size of the quote provided is below or equal to the Size Specific To the financial Instrument (SSTI);
- There is a liquid market for the Non-Equity Instrument;
- The Non-Equity Instrument is TOTV;

## 3. Access Criteria

The 'Access Criteria' below set out the factors that SCB AG may take into account when determining whether a client (the 'Requesting Client') should be given access to a published firm quote already provided to another client (the 'Original Client'). In addition, firm quotes will only be made available to eligible requesting clients in the same instrument as that requested by the Original Client.

These criteria will be applied in an objective and non-discriminatory manner.

If you are a Requesting Client, an SCB AG may decline to trade with you at the published quote where any of the following apply:

1. **General Account Opening Criteria**  
You cease to meet SCB AG's general account opening criteria including having obtained and provided to SCB AG a Legal Entity Identifier (LEI);
2. **Trade Size**  
You ask for a price in respect of a different trade size to the Original Client.
3. **Credit Profile**  
The SCB AG's internal assessment of your creditworthiness differs from that of the Original Client.

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4. Pricing of Cleared vs. bilateral / un-cleared derivative transactions  
A firm quote provided to an Original Client in respect of a transaction in a derivative which is intended to be cleared may not be available to you if you intend to enter into a transaction in the same derivative on a bilateral / un-cleared basis.
5. Derivative Transactions to be cleared on different CCPs  
A firm quote provided to an Original Client in respect of a transaction in a derivative that is intended to be cleared at one CCP may not be available to you if you intend to enter into a transaction in the same derivative that is to be cleared at another CCP.
6. Contractual Agreement Terms  
A firm quote provided to an Original Client in respect of a transaction in a Non-Equity Instrument that is subject to particular contractual terms under the relevant master agreement (e.g. ISDA) and/or collateral agreement (e.g. CSA) may not be available to you if a similar transaction between SCB AG and you would be subject to differing contractual terms, which may or do affect trade economics, credit profile, settlement risk or any other objectively measurable economic or risk parameter.
7. Timing of Quote  
A firm quote in respect of a transaction in a Non-Equity Instrument may be considered stale, and thus no longer executable, if it is traded upon by either the Original Client or the Requesting Client, or market conditions change or with the lapse of time taking into account the liquidity and characteristics of the market for the Non-Equity Instrument in question. The treatment of requests from the Original Client and any Requesting Clients will be in accordance with SCB AG's Order Execution Policy, which can be found on our corporate website and may be updated from time-to-time.

In addition, and notwithstanding that SCB AG may continue to make quotes public, SCB AG may be unable to execute transactions in a Non-Equity Instrument with certain clients where applicable legal or regulatory restrictions prevent it from doing so.

SCB AG may update Firm quotes at any time and under exceptional market conditions retains the right to withdraw quotes based on the prevailing market conditions.

SCB AG may limit the total number of transactions it undertakes to enter at the published conditions in relation to Non-Equity Instruments in a manner that is objective and consistent with its risk management policy. The maximum number of total transactions entered at the published price is set to one. The maximum number of transactions is also subject to the availability of sufficient inventory, e.g. in the case of bonds.

### 4. Mechanism for Publishing and Accessing Quotes

SCB AG quotes will be made public via an Approved Publication Arrangement (APA).

If you are interested in trading against a published quote, please use your usual method of communication to contact your SCB AG salesperson or trader to make a request. To identify the relevant quote, please provide the Quote ID specified against the published quote.

Your salesperson or trader will determine whether that published quote is available to you in accordance with the Access Criteria section above. If not, you may be offered an updated quote, which may in turn be published by SCB AG, if necessary to comply with its obligations.