

MTS SpA, EuroMTS Limited and MTS France SAS (“MTS”) Market Data Transparency Obligation Disclosures 2020

1.0 Introduction

The transparency obligation set out in Article 11 of Commission Delegated Regulation (EU) 2017/567 of 18 May 2016, as published in the Official Journal of the European Union on 31 March 2017 (“the Delegated Act”), requires that “*Market operators and investment firms operating a trading venue and systematic internalisers shall disclose the price and other terms and conditions for the provision of the market data in a manner which is easily accessible to the public*” and makes certain specifications with regard to the contents of this disclosure.

This document incorporates the relevant disclosures as set out in the Delegated Act, with the exception of current price lists and the terms and conditions, which, as detailed below, can be separately accessed on the MTS website.

All data generated from markets operated by MTS is pooled and commercialised by EuroMTS Limited. MTS SpA and MTS France S.A.S have dedicated commercial agreements with EuroMTS for this purpose. Other market operators such as MTS Associated Markets SA and BondSpot SA, which are not part of the MTS Group (but whose markets are run on the same technology) also have commercial data distribution agreements in place with EuroMTS Limited. EuroMTS Limited collates data from the above markets and develops them into packages that are then distributed via vendors or directly to end-users, as detailed in the MTS Data Documents and Fee Schedules.

2.0 Disclosures

Current price lists

Current price lists for MTS Market Data are contained within the Fee Schedules, publicly accessible at www.mtsmarkets.com/resources/market-data. Contractual terms and conditions can also be found at the same location.

Advance disclosure of future price changes

Information on notice of future price changes is contained within the MTS Market Data Documents, as outlined above, and provides for a minimum of 90 days’ notice of future price changes.

Information on the content of the market data distributed

Number of instruments covered	Cash market: 2,756 Bond Vision: 22,357	<i>Instruments admitted to trading on MTS Markets in 2019</i>
Total turnover of instruments covered	Cash market: €8.4bn Bond Vision: €3.5bn	<i>2019 average daily volume traded</i>
Pre-trade and post-trade market data ratio	Cash market: Pre trade: 99.997% Post-trade: 0.003%	<i>Based on 2019 data:</i>

	Bond Vision: Pre trade: 68.424% Post-trade: 31.576%	<ul style="list-style-type: none"> • <i>Pre-trade: number of quotes (for Cash Markets)/ number of requests (for Bond Vision)</i> • <i>Post trade: number of trades (for Cash Markets)/ number of tickets executed</i>
Data provided in addition to market data	MTS provides the following data services for Cash markets: <ul style="list-style-type: none"> • Reference data services • Historical data packages 	
Date of last licence fee adaption for market data provided	1 April 2019	<i>Notice of this fee change was provided to the market in Dec 2018, to take effect from 1 April 2019.</i>

Revenue obtained from making market data available

Per audited 2019 accounts:

Revenue obtained from making market data available	€7.7m
Proportion of that revenue compared to total revenue	11%

Information on how the price was set including the cost accounting methodologies

Costs are apportioned in line with the methodology described in this document.

Background

MTS SpA, MTS France SAS and EuroMTS Limited are ultimately owned by the London Stock Exchange Group plc ("LSEG").

Methodology

Costs are grouped in three categories: direct costs, indirect costs and joint costs.

Direct costs are specifically incurred to run the MTS Market Data business. These costs are allocated in total to the MTS Market Data business and they are not shared with other business areas.

Indirect costs represent the internal services that are necessary to support the MTS Market Data business. These are aggregated in cost pools and assigned allocation drivers which in turn allow their costs to be shared by the Group's revenue generating businesses.

Joint costs are those incurred in running the Market Data and Trading businesses concurrently, given that, due to their nature, it is not possible to offer either of these services in isolation.

Direct costs:

The following are the key direct costs for the MTS Market Data business:

- **Staff costs**
- **Cost of sales**
- **Marketing fees**
- **Professional fees**

Indirect costs:

The following are the key indirect costs allocated to the MTS Market Data business:

- **Property costs**
- **IT infrastructure costs**
- **Divisional support function costs**
- **Group support function costs**

Joint costs:

The MTS Trading and Market Data businesses are jointly produced services: a single technology platform (one each for Cash and BondVision) facilitates both trading activity and data production and it is not possible to offer one service without the other. MTS allocates platform costs equally between its trading and market data businesses.