

# Systematic Internaliser Commercial Policy

10 March 2023

## Policy Purpose

This Policy sets out the circumstances in which Wells Fargo Securities International Limited (“**WFSIL**”), will publish and provide access to quotes when acting as Systematic Internaliser (“**SI**”).

An SI is a firm which *"on an organised, frequent, systematic and substantial basis, deals on own account when executing client orders outside a regulated market, an MTF or an OTF without operating a multilateral system"* (Article 4(1)(20) of the Second Markets in Financial Instruments Directive 2014 (“**MiFID II**”).

WFSIL can decide, on the basis of this Policy, and on the basis of objective and non-discriminatory criteria, the clients that may access the published quotes and execute against the published price.

This Policy will be published and updated from time to time on the Wells Fargo EMEA website at: <https://emea.wf.com>

## Scope

This Policy only applies to WFSIL when they act in the capacity of an SI during trading hours.

- WFSIL only acts as an SI in financial instruments which are: In the non-equity asset classes of Bonds including Sovereign Bonds included in the Annex attached hereto (“**SI Bonds**”);

Where WFSIL acts as an SI it can be identified by its Market Identifier Code (MIC): **WSIL**

## Making Firm Quotes Public

Absent any applicable exemption or waiver from pre-trade transparency, WFSIL, in response to a client request, will make public a firm quote only in respect of SI Bonds, if:

- (a) The relevant financial instrument is:
  - a. Traded on a ‘trading venue’ (as defined in MiFID II); and
  - b. is considered ‘liquid’.
- (b) The size in which we provide the quote is at or below Size Specific to The Instrument “SSTI”,

WFSIL will only make a quote public in SI Bonds after the client who requested the quote has had a reasonable opportunity to respond to it.

The validity of any SI Bond WFSIL quote that was made public will depend on various factors, including market conditions, liquidity and volatility. Under exceptional market conditions, we may withdraw our published quotes. WFSIL have determined that such conditions would exist where the obligation to provide firm prices to clients would be contrary to the prudent management of the risks they are exposed to in their capacity as an SI. Clients will need to confirm the validity of a quote before acting on it.

WFSIL are not obligated to update any quote made public, but reserve the right to do so, including to reflect changes in market conditions or risk management &/or credit exposures. Updating a quote does not extend the period of its validity.

### **Publication Arrangements**

To the extent it is required to do so WFSIL will make use of an external publishing service in order to publish such quotes, during normal trading hours, on the following Bloomberg pages:

WFSIL: GPGX 1106 74

### **Access to Quotes**

WFSIL may deal against published quotes on a first come first served basis. In order to manage and limit the risk arising from dealing at such quotes, WFSIL may deal with only one client and will give priority to the client that initiated the quote request.

Other clients may wish to execute against published quotes if the initiating client does not. However, access to the quotes is subject to the below.

To be given access to any quote, a client must:

- be fully onboarded and categorised by WFSIL in accordance with applicable regulations;
- have accepted and complied with WFSIL terms of business and any related contractual documentation;
- have provided an LEI;
- have provided SSIs if required;
- wish to deal in the same size or smaller in the same direction; and
- ensure the validity of the quote.

WFSIL reserve the right to refuse to provide a client access to SI quotes for the following reasons:

- **Credit Risk:** WFSIL will refer to the credit status of a client in accordance with its internal risk management framework. WFSIL will not provide access to SI quotes, where it considers that there is a "credit risk";
- **Counterparty risk:** WFSIL will refer to its internal risk management policies and external benchmarks to calculate counterparty risk. WFSIL will not provide access to SI quotes, where it considers that there is "counterparty risk";
- **Settlement risk:** A client is required to provide sufficient details or agreements in relation to the settlement procedures. WFSIL will not provide access to SI quotes, where it considers there is a "settlement risk"

If you are interested in trading against a published quote, please use your usual method of communication to contact your WFSIL salesperson or trader to make such request.

## Annex

### **WFSIL**

#### **SI Bonds**

Asset Class: Sovereign Bonds

Issuer: United States Treasury (all)