

Legal basis	Contents			
<p>Article 89(2)(a) of Delegated Regulation (EU) No2017/565 and Article 11(2)(a) of Delegated Regulation (EU) No 2017/567</p>	<b>Price List: year 2024</b>			
	<p>The Data Distribution Agreement of BME Market Data, including the applicable fees which constitutes Annex 4 to such Agreement, is available at:  <a href="http://www.bmemarketdata.es/ing/Documents/Contractual">http://www.bmemarketdata.es/ing/Documents/Contractual</a></p>			
<p>Article 89(2)(b) of Delegated Regulation (EU) No 2017/565 and Article 11(2)(b) of Delegated Regulation (EU) No 2017/567</p>	N/A			
<p>Article 89(2)(c)(i-iii) of Delegated Regulation (EU) No 2017/565 and Article 11(2)(c)(i-iii) of Delegated Regulation (EU) No 2017/567</p>	<b>Market Data Content Information</b> <i>Period covered: 01/01/23 - 31/12/23</i>			
	<b>Asset Class</b>	<b>1) Number of instruments covered</b>	<b>2) Total turnover of instruments covered</b>	<b>3) Pre- trade/post-trade market data ratio</b>
	<p><b>Equity instruments (shares, ETFs, DRs, certificates, other equity-like financial instruments)</b></p>	4,455	301,630 (M€)	90.65
	<p><b>Bonds</b></p>	2,038	184,037 (M€)	36,470.99
	<p><b>ETCs ETNs</b></p>			
	<p><b>SFPs</b></p>	694	0	0
<p><b>Securitised derivatives</b></p>				

	<b>Interest Rate Derivatives</b>			
	<b>Credit Derivatives</b>			
	<b>Equity derivatives</b>	67,990	455,899 (M€)	346.43
	<b>FX derivatives</b>	34	53.52 (M€)	731,547
	<b>Emission allowances derivatives</b>			
	<b>C10 derivatives</b>			
	<b>Commodity derivatives</b>	403	491.02 (M€)	0.24
	<b>CFDs</b>			
	<b>Emission allowances</b>			
<i>Article 89(2)(c)(iv) of Delegated Regulation (EU) No 2017/565 and Article 11(2)(c)(iv) of Delegated Regulation (EU) No 2017/567</i>	<b>Information on any data provided in addition to market data</b>		<ul style="list-style-type: none"> <li>• <i>Information with greater market depth (10/20 aggregated quotes and FOB)</i></li> <li>• <i>End-of-day information</i></li> <li>• <i>Historical data</i></li> <li>• <i>Tick data</i></li> <li>• <i>Analytics</i></li> <li>• <i>Reference data (master data and corporate actions)</i></li> <li>• <i>Market statistics</i></li> </ul>	
<i>Article 89(2)(c)(v) of Delegated Regulation (EU) No 2017/565 and Article 11(2)(c)(v) of Delegated Regulation (EU) No 2017/567</i>	<b>Date of the last licence fee adaption for market data provided</b>		01/04/2023	

<p><i>Article 89(2)(d) of Delegated Regulation (EU) No 2017/565 and Article 11(2)(d) of Delegated Regulation (EU) No 2017/567</i></p>	<p><b>Total Market Data Revenues (EUR)</b></p>	<p><i>31.33 M€ (data for 2023)</i></p>
	<p><b>Market Data Revenues as a proportion of total Revenues (%)</b></p>	<p><i>10.82% (data for 2023, audited annual accounts)</i></p>
<p><i>Article 89(2)(e) of Delegated Regulation (EU) No 2017/565 and Article 11(2)(e) of Delegated Regulation (EU) No 2017/567</i></p>	<p><b>Information on cost accounting methodology: year 2024</b></p>	
	<p>Information on how the price was set, including the cost accounting methodologies used and information about the specific principles according to which direct and variable joint costs are allocated and fixed joint costs are apportioned</p>	<p>The details of the cost accounting methodology are included below</p>

## COST ACCOUNTING METHODOLOGY

Bolsas y Mercados Españoles Market Data, S.A. is a 100% subsidiary of BME Group, specialized in delivering real-time data flows corresponding to the Regulated Markets and Multilateral Trading Facilities operated by the BME Group, as well as end of day and historical market data, indices information and indices licenses and other ancillary and related services.

BME Market Data books only include expenses related to its specific activity *stricto sensu*. That is, for the particular case of real time market data, the incremental costs of elaboration and distribution of the data feeds.

Therefore, in order to comply with Article 11 (e) of Commission Delegated Regulation (EU) 2017/567 and the **Final Guidelines on the MiFID II / MiFIR obligations on market data** published on August 18, 2021, BME has developed a cost accounting methodology to allocate the costs that stem from the production and dissemination of Market Data.

This methodology classifies costs in the following categories:

1. Costs that are directly and exclusively attributable to the dissemination of market data activity that are allocated in full to Market Data, hereinafter refer to as “Market Data costs” and include:
  - a. Human Resources, excluding 80% of the connectivity services staff (BME London Hub, BME Proximity and BME Co-Location).
  - b. Other operating expenses: office and other premisses rent, hardware and software, communications, business travel, marketing and promotion, professional services, information services, energy and supplies, security, cleaning and maintenance, variation of provisions for commercial operations.
  - c. Amortization of fixed assets (i.e. software, hardware and others).

In this category (costs directly and exclusively attributable to the dissemination of market data activity), only those related to the dissemination of market data up to 5 best aggregated bids and offers (hereinafter “MiFID II Data”) are included, as the rest of data services (e.g. index data or data sets displaying more market depth) are outside the scope of Article 11 of Delegated Regulation 2017/567 and the **Final Guidelines on the MiFID II / MiFIR obligations on market data**, published on August 18<sup>th</sup> of 2021.

In order to determine which percentage of the total costs correspond to MiFID II Data (the rest corresponds to “non MiFID II Data”), BMEMD use, as allocation key, the volume based on messages attributable to each category, in line with ESMA’s recommendations published in the Final Report: Guidelines on the MiFID II/MiFIR obligations on market data, published June 1<sup>st</sup> of 2021. Specifically, the ratio between the messages of the information products SIB N2 and SIB N2+ has been used as a proxy.

- **SIB N2 (MiFID II Data):** details of each trade and up to 5 best aggregated bids and offers.

- **SIB N2+ (non MiFID II Data):** details of each trade and up to 20 best aggregated bids and offers.

The percentage of information attributable to MiFID II Data (X%) is obtained comparing the volume of messages disseminated in both products. This percentage X% is used to determine the costs attributable to the dissemination of MiFID II Data, applying that percentage to the total costs of each category.

2. Costs related to the production of information (hereinafter “Joint costs”). These Joint costs include costs incurred by entities of the Markets’ business units (equities, fixed income and derivatives, hereinafter “Markets”) in relation to both the generation of market data and the provision of execution (and related) services, costs which are jointly generated and, therefore, which is not possible to disclose them separately.

Order execution (which requires market data and, at the same time, generates it) is carried out by the Markets, which assume their own operating costs. Therefore, for the determination of Joint Costs, the following cost items associated with Markets have been considered:

- a. Human Resources
  - i. Markets’ HHRR costs, excluding primary market.
  - ii. HHRR costs of IT (operations, corporate and markets), sales office, finance department, marketing and communications, risks, legal and compliance.
  - iii. Indirect costs associated with the resources of the aforementioned business units using a cost/hour ratio of the general costs (lease, energy and supplies, security and cleaning, consumables and others)
- b. Other Operating costs: costs related to hardware and software, communications, professional services (intercompany services associated to management fees and others) and other costs (CNMV fees and Board allowances).
- c. Amortization of fixed assets (i.e. software, hardware and others).

On the contrary, the following items were not considered:

- a) HHRR costs: not included the HHRR of primary markets (equities and fixed income), client office, securities services (business and IT), marketing & communications, internal audit and compensations.
- b) Other Operating costs: not included costs of office leases, non-business communications, business trips, marketing & promotions, information services, energy and supplies, publications, transports, insurance, banking services, subscriptions, consumables, other intercompanies, other expenses, tributes and impairment losses.
- c) Amortization of fixed assets: not included the amortization of the building at Plaza de la Lealtad.

In order to determine which percentage of Markets’ total costs are associated with order execution and market data generation, the volume based on messages is used as allocation

key, in line with ESMA’s recommendations published in the “Final Report: Guidelines on the MiFID II/MiFIR obligations on market data” released on June 1<sup>st</sup>, 2021.

Specifically, the ratio between public (trades, bids&offers, volumes, etc.) and private (order execution) messages has been used. The ratios obtained are the following:

<b>% Messages</b>	<b>FIXED INCOME</b>	<b>EQUITIES</b>	<b>DERIVATIVES</b>	<b>TOTAL</b>
<b>% TOTAL PUB</b>	A	B	C	Y%
<b>% TOTA PRI</b>	1-A	1-B	1-C	1-Y%

Given that Markets generate both MiFID II Data and non MiFID II Data, the ratio X% (MiFID II Data vs all data disseminated by BMEMD) is applied to all the percentages of the table above in order to come up with the Joint costs strictly attributable to the generation of MiFID II information.

#### **Determination of the Reasonable Margin:**

BMEMD fees and policies must be considered taking into account that most BME costs are of fixed nature. Therefore, any decrease in its revenues would not be offset by a decrease in costs.

Additionally, it must also be taken into account the relevant factors that frame BME activities such as the concentration of its trading activities on a certain number of issuers and market members, the wide implications of the very stringent regulation applicable to BME and the implications it faces as IT proper functioning is concerned.

These two elements have a direct impact on the determination of a reasonable margin of revenues. Stablishing a fixed margin would imply an increase in fees should BMEMD’s revenues’ decline because of lesser interest in BMEMD Data or the commercialization of substitutive information products by BMEMD’s competitors.

Hence, BMEMD does not apply a fixed margin to its revenues. Considering that the average margin of financial and technological entities of the S&P ranges from 18,6% to 24,1% in Q3 2021<sup>1</sup>, a margin circa 20% is therefore considered “reasonable”. BMEMD’s margin obtained through the commercialization of MiFID II Data products is way below that threshold.

---

<sup>1</sup> <https://insight.factset.com/sp-500-is-reporting-third-highest-net-profit-margin-since-2008-for-q3>