

## Market Data Transparency & Reasonable Commercial Basis Obligations

In line with Article 11, on transparency obligation, of Commission Delegated Regulation (EU) 2017/567 of 18 May, 2016, the following information is made available to the public:

### a) Current price lists

The Data Distribution Agreement of BME Market Data, including the applicable fees which constitutes Annex 4 to such Agreement, is available at:

<http://www.bmemarketdata.es/ing/Documents/Contractual>

### b) Advance disclosure with a minimum 90 days' notice of future price changes

Future price changes will be available at the link above, clearly stating the date in which the new fees apply.

### c) Information of the content of the market data

Content of the market data	Market	Data	Comments
Number of instruments covered	Equities	5,578	Instruments admitted to trading on BME as of 31/12/2018
	Derivatives	41,343	Instruments admitted to trading on BME as of 31/12/2018
	Fixed Income	3,346	Instruments admitted to trading on BME as of 31/12/2018
Total Turnover of instruments covered	Equities	587,963 (M€)	Total turnover (1/1/2018 – 31/12/2018)
	Derivatives	37.48 (M)	Total contracts (1/1/2018 – 31/12/2018)
	Fixed Income	200,758 (M€)	Total turnover (1/1/2018 – 31/12/2018)
Pre-trade and post-trade market data ratio*	Equities	3,869	(1/1/2018 – 31/12/2018)
	Derivatives	741	(1/1/2018 – 31/12/2018)
	Fixed Income	11,999	(1/1/2018 – 31/12/2018)

\*Average number of orders per trade for the stated period

Information on any data provided in addition to market data	<ul style="list-style-type: none"> <li>• End-of-day information</li> <li>• Historical data</li> <li>• Tick data</li> <li>• Analytics</li> <li>• Reference data (master data and corporate actions)</li> <li>• Market statistics</li> </ul>
The date of the last license fee adaptation for market data provided	1/1/2019

**d) Revenue obtained from making market data available**

Revenue obtained from making market data available:

34.96 million euros (data for 2018, per audited annual accounts)

Proportion of that revenue compared to the total revenue:

11.37% of the BME Group consolidated revenue for 2018 (per audited annual accounts)

**e) Information on how the price was set including the cost accounting methodologies used**

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 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:

- Costs that are directly and exclusively attributable to the Market Data activity that are allocated in full to Market Data.
- Costs totally unconnected to the Market Data activity that are not allocated to Market Data.
- Indirect Costs, mainly related to overhead, which are not directly registered in a specific individual company because the management is done on a Group basis. Under this category we also consider external costs (such as fees paid to NCAs) also attributable to the Group as a whole.
- Joint Costs related to the production of the information itself (i.e. prices of the stocks). These Joint Costs are incurred on the basis that Market Data and trading execution are services jointly produced and, therefore, it is not possible to disclose these costs separately.

This cost accounting methodology 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, the BME cost accounting methodology and its relation with BME revenues must also be considered in light of 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.