Version: 2.0 Date: April 2025

# Bloomberg Data Reporting Services B.V. | APA Europe MiFIR Article 27g APA Disclosures

# A. Access Requirements

Bloomberg Data Reporting Services B.V. ("BDRS BV") accepts all clients for APA services that meet its access and acceptance criteria, as summarized below.

# 1 Access and Acceptance Criteria

- **1.1 Client Types:** All clients must be legal entities. No individuals will be accepted. Clients are not required to subscribe for or use services offered by other members of the Bloomberg Group in order to use the APA services.
- 1.2 Legal Entity Identifier (LEI): All clients must have a valid 20-digit alpha-numeric Legal Entity Identifier ("LEI") issued by an accredited issuer for each reporting entity. It is the responsibility of the prospective client to obtain an LEI for each reporting entity with access to the APA services. All fees and charges associated with obtaining an LEI are also the responsibility of the client.
- **1.3 Technical Conformance Requirements:** All clients are required to meet the technical conformance requirements specified by BDRS BV for APA services. The decision as to whether a prospective client has met technical conformance requirements lies solely with BDRS BV's technical team.

Technical conformance requirements may change from time to time. BDRS BV will provide clients with as much notice as possible of any changes to these requirements. It is the obligation of clients to ensure that they test to meet revised requirements in the event of a change. Clients may be denied future access to APA services in the event that BDRS BV's technical team believes that the client does not adequately conform to them.

**Sanctions:** BDRS BV will not accept clients subject to any relevant sanctions lists, or any client who is more than 50% owned or controlled by a sanctioned person.

## 2 Misuse of APA Services

In the event that BDRS BV determines that a client is misusing the APA services or is otherwise in breach of BDRS BV's terms applicable to the services, BDRS BV has the right to suspend or terminate such client's access to the services.

Bloomberg

# B. Pricing Policy

Prices and fees are provided for each separate service provided by BDRS BV, with details of any discounts or rebates that apply and the conditions that must be satisfied to qualify for those reductions. BDRS BV seeks to avoid conflicts of interest between BDRS BV and its clients when setting the prices and fees charged by BDRS BV for each of its services.

Prices and fees associated with BDRS BV's services are charged on a non-discriminatory basis. BDRS BV does not offer preferential pricing arrangements. Discounts and rebates are applied equally to all clients falling within the same category.

# 1 APA Pricing and Fees

# 1.1 Current Pricing and Fees

BDRS BV's current pricing and fees are set out below.

Minimum Fee: USD 11,000 per annum.

**Rate Card:** The annualized APA rate card below is pro-rated and applied monthly to the actual number of reports published during the immediately preceding calendar month.

	Annualized Min Volume (Reports Published)	Annualized Max Volume (Reports Published)	Marginal Unit Cost (USD)
Tier 1		50,000	0.060
Tier 2	50,001	500,000	0.030
Tier 3	500,001	5,000,000	0.007
Tier 4	5,000,001	10,000,000	0.006
Tier 5	10,000,001	20,000,000	0.005
Tier 6	20,000,001	50,000,000	0.004
Tier 7	50,000,001	100,000,000	0.003

There is no additional charge for reports submitted to BDRS BV to correct an error in a previously submitted report that has not yet been published.

# **Discounts:**

Certain customers are on legacy pricing arrangements for low-volume users with specific third-party outsourcers, under which these customers do not pay the minimum fee but only the rate card fee. Eligibility for this discount is limited to customers using these specific third-party outsourcers. No other discounts are currently available.

Where Bloomberg Data Reporting Services Limited also provides UK APA services under the same contract as BDRS BV provides EEA APA services, the minimum fee and rate card are applied across both UK and EEA APA services.

### 1.2 Changes to Pricing and Fees

Changes to pricing and fees are subject to an approval process involving BDRS BV Compliance and BDRS BV's Management Board, with notification to ESMA.

### Disclaime

Bloomberg Data Reporting Services B.V. is a limited liability company incorporated in the Netherlands, registered in the commercial register of the Chamber of Commerce under number 71620761, whose registered office is at Gebouw Byzantium, Stadhouderskade 14G, 1054 ES Amsterdam, authorised and regulated by the European Securities and Markets Authority (ESMA).

The data included in these materials are for illustrative purposes only. The BLOOMBERG TERMINAL service and Bloomberg data products (the "Services") are owned and distributed by Bloomberg Finance L.P. ("BFLP") except (i) in Argentina, Australia and certain jurisdictions in the Pacific islands, Bermuda, China, India, Japan, Korea and New Zealand, where Bloomberg L.P. and its subsidiaries ("BLP") distribute these products, and (ii) in Singapore and the jurisdictions serviced by Bloomberg's Singapore office, where a subsidiary of BFLP distributes these products. BLP or one of its subsidiaries provides BFLP and its subsidiaries with global marketing and operational support and service. Certain features, functions, products and services are available only to sophisticated investors and only where permitted. BFLP, BLP and their affiliates do not guarantee the accuracy of prices or other information in the Services. Nothing in the Services shall constitute or be construed as an offering of financial instruments by BFLP, BLP or their affiliates, or as investment advice or recommendations by BFLP, BLP or their affiliates of an investment strategy or whether or not to "buy", "sell" or "hold" an investment. Information available via the Services should not be considered as information sufficient upon which to base an investment decision. The following are trademarks and service marks of BFLP, a Delaware limited partnership, or its subsidiaries: BLOOMBERG, BLOOMBERG ANYWHERE, BLOOMBERG MARKETS, BLOOMBERG NEWS, BLOOMBERG PROFESSIONAL, BLOOMBERG TERMINAL and BLOOMBERG.COM. Absence of any trademark or service mark from this list does not waive Bloomberg's intellectual property rights in that name, mark or logo. All rights reserved. © 2025 Bloomberg.