

## Bloomberg Trading Facility Limited (“BTF”) Multilateral Trading Facility Market Data Fees Disclosure

### 1 Real Time Data

This section sets out BTF’s price list for licences to access and use market data within the first 15 minutes of its publication by BTF (“**Real Time Data**”)<sup>1</sup>. This is a summary of key terms. Full terms and conditions are set forth in (a) the BTF Data Subscription Agreement, which all subscribers must sign before receiving access to Real Time Data under paragraph 1.1 below, and/or exercising the derived rights under paragraph 1.2 below, and (b) the BTF Data Distribution Agreement, which all distributors must sign before receiving the distribution licence under paragraph 1.3 below.<sup>2</sup>

#### 1.1 View Only<sup>3</sup> – Individual End User Rights

Pre-Trade Data	Pre-Trade Data (Disaggregated)	Post-Trade Data	Post-Trade Data (Disaggregated)
\$40 per month	\$25 per month for a single disaggregation \$5 per month for each additional disaggregation	\$40 per month	\$25 per month for a single disaggregation \$5 per month for each additional disaggregation

The view-only rights licence is priced on a per individual end user basis and is the same regardless of whether the individual end user accesses the data through BTF directly or via a distributor (see below).

Data on BTF’s trading venue may be disaggregated by (a) asset class; (b) sovereign debt country of issue; and (c) currency in which the financial instrument is traded.

#### 1.2 Derived rights<sup>4</sup> – Entity Rights

End User Pre-Trade Data	End User Pre-Trade Data (Disaggregated)	End User Post-Trade Data	End User Post-Trade Data (Disaggregated)
\$6,250 per month	\$4,000 per month for a single disaggregation \$750 per month for each additional disaggregation	\$6,250 per month	\$4,000 per month for a single disaggregation \$750 per month for each additional disaggregation

<sup>1</sup> Please note that all currency amounts in this disclosure are in United States Dollars. All fees are billed quarterly in arrears.

<sup>2</sup> The BTF Data Subscription Agreement and the BTF Data Distribution Agreement are available upon request.

<sup>3</sup> The rights include rights to conduct basic analytics but no derived rights. Further details of the conditions of the licence are available upon request.

<sup>4</sup> The derived rights licence only covers internal proprietary use of the data for (a) creating algorithms; (b) price formation; or (c) in risk engines. For the avoidance of doubt, these internal use rights do not include index creation, financial instrument creation or any other derived rights. Any other derived rights for Real Time Data must be preapproved by BTF. Further details of the conditions of the licence are available upon request.

The derived rights licence is priced on a per legal entity basis (rather than on an individual end user basis).

Data on BTF's trading venue may be disaggregated by (a) asset class; (b) sovereign debt country of issue; and (c) currency in which the financial instrument is traded.

### 1.3 Distributor Rights<sup>5</sup>

Distributor Data	
Number of End Users <sup>6</sup>	Annual Fee
0 – 100	\$125,000
101 – 250	\$250,000
251 – 700	\$350,000
701 – 2,000	\$700,000
2,001 – 5,000	\$1,250,000
5,001 – 15,000	\$1,875,000
15,001 +	\$2,000,000

The distribution licence is priced by reference to the number of individual end users with access to the Real Time Data and/or the Delayed Data via the distributor, as noted above.

## 2 Delayed Data

Rights relating to market data 15 minutes after its publication ("**Delayed Data**") are made available at no charge provided that the recipient uses the Delayed Data only for internal proprietary purposes (and not for any client-facing activities).

Any non-internal or non-proprietary use of the Delayed Data is subject to pre-approval by BTF and may be chargeable.

## 3 Information on the Content of Market Data

For the period 1 January 2024 – 31 December 2024, the number of instruments covered in BTF's market data was as follows:

Pre-Trade 10,351

Post-Trade 86,941

For the same period, total turnover of instruments covered was EUR 26.8 trillion.

The pre-trade and post-trade market data ratio is 1:8

BTF does not provide any information in addition to market data. The updated licence fees set out above are effective 1 June 2025. The last licence fee adaption prior to this update was 3 January 2018 and fees had not changed since that date.

## 4 Revenue Obtained from Market Data

Revenue obtained by BTF for making market data available represents approximately 3.6% of the firm's revenues and as such is not considered material to the firm's overall business.

<sup>5</sup> The scope of distributor rights is set out in the relevant licence agreement. Further details of the conditions of the licence are available upon request.

<sup>6</sup> End users include natural persons with access to the Real Time Data and/or the Delayed Data via the distributor.

## **5 Information on how Market Data Prices have been determined**

The prices of market data set out above have been based on the cost of producing and disseminating such data with a reasonable margin added to such costs. The prices charged to different categories of customers have been determined by reference to BTF's assessment of the value the market data represents to those customers, taking into account:

- the scope and scale of the market data; and
- the use made by the customer of the market data.

The cost accounting methodology used to calculate the cost of producing and disseminating the market data has been direct identification of costs, plus an allocation of those costs based on expected volume of data generated by BTF.

This is because some of these costs are effectively joint costs that are split between BTF and an affiliate, Bloomberg Data Reporting Services Limited (a UK-based operator of an approved publication arrangement). In addition, the indirect costs of hardware and people are shared with other elements of Bloomberg's business (and their time cost allocation takes into account other joint costs such as the premises occupied by such hardware and people).

Some of the costs of providing market data will depend on client demand. Once future needs are determined costs may be varied accordingly.