



RBC Capital Markets

**RBC Paris Branch
Non-Equity Systematic Internaliser
Commercial Policy**

July 2021

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1.0 Summary Statement

This document forms the RBC Paris Branch (“RBCPB” or “the Firm”) Non-Equity Systematic Internaliser Commercial Policy (“the Policy”). This Policy applies in cases where RBCPB acts as a Systematic Internaliser in respect of those financial instruments that fall into any of the asset classes set out in Section 2.1.

A “Systematic Internaliser” (“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” (see Article 4(1)(20) of the Second Markets in Financial Instruments Directive 2014 (“MiFID II”).

2.0 Scope

2.1 Categories of Financial Instrument

This Policy applies to all trading in non-equity financial instruments where RBCPB is designated as a Systematic Internaliser (“Non-Equity Transactions”). For the purposes of this Policy, Non-Equity Transactions comprise trading in financial instruments belonging to the following sub-asset classes as defined in EU Delegated Regulation 2017/583:

- FX Derivatives sub-asset classes excluding FX futures;
- Interest Rate Derivatives sub-asset classes excluding Bond Futures/Forwards, Bond options and Swaptions.

When trading in one of the excluded sub-asset classes above, RBCPB will not act as a Systematic Internaliser.

2.2 Purpose of this Policy

This Policy is designed to clarify the following matters when RBCPB will make SI quotes available.

3.0 Requirements

These following obligations apply when RBCPB is a Systematic Internaliser in relation to Non-Equity Transactions.

3.1 Provision of Quotes

As an SI RBCPB may be required to publish SI quotes. RBCPB will not make public firm SI quotes in non-equity financial instruments that are traded on a 'trading venue' (as defined in MiFID II) and which are considered 'liquid'.

Where a client requests an SI quote in a liquid instrument which RBCPB would be required to make public, RBCPB will decline to make a firm quote as an SI.

As an alternative, RBCPB and the client will determine if the related quotes and any subsequent execution can be undertaken on a trading venue.

In accordance with MiFIR Article 18, RBCPB is not obliged to make public firm SI quotes in non-equity instruments in sizes above the size specific to the financial instrument (“SSTI”) or if a waiver applies to the relevant activity. Where the non-equity instrument is considered ‘illiquid’, RBCPB will only disclose its SI quote to the individual client who requested the quote, subject to RBCPB agreeing to do so.

3.2 Execution Terms

Where a client has requested, and RBCPB has agreed to provide, an SI quote, the client will have the ability to execute against said quote, subject to RBCPB's terms of business with the client and this Policy. If the client does not execute against the SI quote provided, RBCPB will not be required to provide the client with another SI quote unless agreed by RBCPB.

3.3 Waivers

To the extent applicable, RBCPB may rely on certain pre-trade transparency waivers in accordance with MiFIR (each, a 'Waiver') and in such circumstances, will not be required to make an SI quote public.