EMIR and MiFID Client Clearing Fees Disclosure Document
Royal Bank of Canada London Branch

Introduction

The European Market Infrastructure Regulation\(^1\) (EMIR) and Markets in Financial Instruments Directive\(^2\) and Regulation\(^3\) (collectively MiFID II) require that the European Central Counterparties (CCPs) and their Clearing Members shall publicly provide:

1. Client Clearing Fees Disclosure (as set out in this Document); and

   Discloses the prices and fees associated with the clearing services provided. Clearing Members must disclose the prices and fees of each service provided separately, including discounts and rebates and the conditions to benefit from these reductions.

2. Client Clearing Disclosure

   Discloses the levels of protection and the costs associated with the different levels of segregation that are provided. Details of the different levels of segregation should include a description of the main legal implications of the respective levels of segregation offered including information on the insolvency law applicable in the relevant jurisdictions and publicly disclose the general terms and conditions under which such services are provided.

RBC London Branch (“RBCLB”) Clearing Prices and Fees - Overview

RBCLB operates a cost-plus charging model, i.e. all costs discussed in this document are solely the charges imposed by RBCLB for the provision of clearing services to you and are in addition to any other applicable charges imposed by external parties such as exchanges, clearing houses, CCPs, or external brokers.

As described in the following table, RBCLB's clearing fees are determined on the basis of a client’s:

- current and future relationship with RBC Capital Markets;
- credit rating and business activity profile;
- operational and service complexity, including levels of account segregation; and
- any additional services provided.

All of these factors are taken into consideration when determining a client's standard fee structure on either a cost per lot or per trade basis, including the ability to benefit from any discounts or rebates.

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RBCLB Clearing Prices and Fees – Core Criteria

The core criteria which impacts the cost to RBCLB of clearing and therefore a client's overall fee structure is set out below. Each factor is considered separately and will have a varying impact on the fees charged.

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<th>Criteria</th>
<th>Lower Fees</th>
<th>Higher Fees Product</th>
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<td>OTC cleared derivatives Exchange Traded Products</td>
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<td><strong>Exchange Traded Products</strong></td>
<td>Mature or STP markets</td>
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<td><strong>Trading Volumes</strong></td>
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<td><strong>Onboarding Complexity</strong></td>
<td>Low complexity, single account standard offering</td>
<td>High complexity, multiple accounts or bespoke legal terms</td>
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<td><strong>Collateral Type</strong></td>
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RBCLB Clearing Fees – Standard Fees for Omnibus Accounts

Standard fees are indicative of our standard client pricing model for omnibus accounts held at all European Exchanges and CCPs under EMIR/MiFID II, taking into account all the cost factors included in the Table above.

All fees are negotiated with each client individually based on the criteria set out above.

- Indicative standard fees for listed products across all Exchanges and CCPs with no discounts or rebates are typically charged a maximum fee of EUR 10 per contract

- Significant discounts/rebates may apply where annual client activity is high and product/service requirements are standard

**Individual Segregation Accounts– Additional Costs and Fees**

As per Article 39(5) and 39(7) of EMIR and Indirect Clearing RTS⁴ of MiFID II, a Clearing Member shall offer its clients, at least, the choice between omnibus client segregation and individual client segregation and inform them of the costs and level of protection associated with each option.

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Additionally, where RBCLB as a Clearing Member provides indirect clearing services, we must offer our clients a choice of a basic omnibus segregated account and a gross omnibus segregated account and inform them of the costs and level of protection associated with each option.

Due to factors such as significantly higher operational complexity (and development investment), the individually segregated account structures will result in higher direct account costs at the CCP and for the Clearing Member.

Therefore, RBCLB will apply an additional maximum monthly maintenance charge of €10,000.

**Additional Services (optional)**

The fees charged by RBCLB may increase where, at RBCLB’s discretion, a client is offered, and takes advantage of, some or all of the additional services described below.

**Collateral Management Fees**

Clients are charged a monthly collateral management fee based on the utilisation of non-cash collateral to cover margin requirements, the eligibility of the collateral at the underlying exchange and collateral concentration risks.

**Cash and Collateral Transformation**

Where a client needs the ability to use cash/assets that are not eligible for onward delivery to an applicable CCP, RBCLB offers a cash/collateral transformation service.

- Collateral charges will be assessed in light of the type of non-eligible collateral, its quality and liquidity.

- A credit and debit interest rate with an additional spread will be applied for positive and negative cash balances in each currency. The interest rates are based on prevailing benchmark rates in each currency.

**Bespoke Technology or Operational solutions**

RBCLB can, for example, provide regulatory reporting solutions (i.e. a delegated EMIR Trade Report Facility).

**Maintenance Fee (MF)**

In addition to the standard fees, RBCLB may apply a monthly Maintenance Fee (MF) where the client activity is not sufficient to sustain the ongoing costs of servicing their accounts.

The MF varies from €3,000 a month to a maximum of €10,000 a month for the provision of both listed derivatives and OTC clearing.