



Commonwealth Bank
of Australia

Systematic Internaliser Commercial Policy

July 2023



Introduction

Commonwealth Bank of Australia ABN 48 123 123 124 AFSL and Australian credit licence 234945 ('CBA' or 'We') is a public company registered in Australia under the Corporations Act 2001 (Cth). It is authorised and regulated in the United Kingdom by the Prudential Regulation Authority and subject to regulation by the Financial Conduct Authority (FRN 139185).

The purpose of this Commercial Policy is to set out how CBA operates as a Systematic Internaliser (SI) under the MiFIR pre-trade transparency obligations.

SIs are investment firms which, on an organised, frequent, systematic and substantial basis, deal on own account by executing client orders outside a regulated market, MTF or OTF without operating a multilateral system.

Obligations

CBA is an SI in certain non-equity instruments or issuers where CBA has exceeded the thresholds set out in MiFID II. The list of issuers in which CBA is an SI is subject to change and the current list can be obtained from your normal sales contact.

In liquid non-equity instruments where CBA is an SI we are not obliged to provide a quote to clients. If we agree to provide a quote to a client we shall provide the same quote to other clients by making it public, subject to the restrictions set out below.

We are obliged to make public quotes in liquid non-equity instruments that are below a size threshold, the threshold being the Size Specific to The financial Instrument (SSTI). Quotes given to clients above this threshold will not be made public.

For quotes in illiquid instruments in which CBA is an SI, CBA has an obligation to disclose such quotes to clients on request. CBA will rely on the waiver under MAR 6.4A.1 and will not disclose quotes to other clients.

Pricing

The price shown in the quotes is the all in price. This price may include client-specific elements such as credit spreads, counterparty risk or settlement risk which may vary from client to client. Therefore, if a client wishes to trade on a published quote that was given to a different client, the price may be higher or lower compared to the original quote.

How to access quotes

CBA publishes quotes via its Approved Publication Arrangements (APA). CBA uses Trax as its APA and clients may get access via <https://traxapa.com/apa-publication/index.html#/quotes>

SI quotes by CBA can be identified by the Market Identifier code CBAL.

Quotes will be executable by clients by contacting their usual sales coverage team. Access to quotes will only be possible for clients who have been fully onboarded for transacting in the relevant instrument and have in place all relevant documentation, including a MiFID client agreement and any further trading agreements.



Restrictions on access

- Quotes will be available for a reasonable period of time dependent on market conditions and instrument type
- Quotes made public may be updated at any time
- Quotes made public may be withdrawn under exceptional market conditions
- Credit status, Counterparty risk and settlement risk are factors considered which may restrict certain clients from accessing a quote that has been made public
- Quotes will only be tradeable on the same terms quoted to the original client (e.g. size, direction, tenor etc) including those factors not explicitly published by the APA
- Quotes may be withdrawn where they have been made in error
- Other objective, non-discriminatory factors may be taken into account

