

OP Corporate Bank plc's Systematic Internaliser Commercial Policy in Bonds

1. Regulatory Background

This is the Commercial Policy (the "Commercial policy") for OP Corporate Bank plc ("OP") acting as a Systematic Internaliser ("SI") as under the Regulation (EU) No 600/2014 of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments and amending Regulation (EU) No 648/2012. A SI is an investment firm which, on an organized, frequent, systematic and substantial basis, deals on own account by executing client orders outside a regulated market, Multilateral Trading Facility or an Organised Trading Facility without operating a multilateral system.

The purpose of this Commercial Policy is to set out the rules how OP governs the access to quotes and set out the scope of products in which OP acts as a SI as required by the regulation. The rules must operate in an objective, non-discriminatory way including considerations such as investor credit status, counterparty risk and final settlement of the transaction.

This commercial policy should be read together with our best execution policy, which can be found at: <https://uusi.op.fi/henkiloasiakkaat/saastot-ja-sijoitukset/toimeksiantojen-huolellinen-toteuttaminen>.

This commercial policy will be reviewed at least annually, and when there is a change in OP's SI status, or otherwise when OP needs to make changes to this commercial policy.

2. Publication of quotes

As per the Regulation (EU) No 600/2014 article 18, Investment firms shall make public firm quotes in respect of bonds, structured finance products, emission allowances and derivatives traded on a trading venue for which they are systematic internalisers and for which there is a liquid market.

As OP is acting as a SI, it has an obligation to enter into transactions based on a given quote in such instruments but may limit the number of such transactions. In addition, OP has the right to update quotes at any time and under exceptional market conditions OP has the right to withdraw its quotes. Any quotes provided will always be subject to market movements and/or market conditions.

In liquid instruments a SI shall make quotes available publicly when asked by a client for a quote and the SI agrees to provide a quote. In illiquid instruments SI should disclose quotes to clients upon request.

OP Corporate Bank will use an Approved Publication Arrangement ("APA") to publish its quotes.

3. Product scope

OP Corporate Bank is SI in all bonds that are traded on a trading venue. For liquid bonds traded in sizes below the notional threshold size specific to the instrument ("SSTI") published by the European Securities and Markets Authority ("ESMA"), OP will make its firm quotes available through the APA.

4. Client access

OP has the right to decide, based on its commercial policy and in an objective non-discriminatory way, the clients to whom it give access to its quotes. OP may refuse to enter into or discontinue business relationships with clients on the basis of commercial considerations such as the client credit status, counterparty risk and the final settlement of the transaction.

OP will use TRAX APA as the platform for publishing quotes. Access to this website is currently free for OP's clients. If a client wants to trade on a displayed quote the client must contact OP.

5. Trading hours

OP will fulfil its obligation as a SI during the normal trading hours for bonds.

6. SI information

OP Corporate Bank LEI: 549300NQ588N7RWKBP98; OP Corporate Bank MIC: OPCO