

## CLIENT VOICE RECORDING & REQUEST PROCEDURES

This document provides information to Clients of Instinet Germany GmbH ("IGG" or "Instinet"), authorised by the Federal Financial Supervisory Authority (German: Bundesanstalt für Finanzdienstleistungs-aufsicht; the BaFin) and regulated by the BaFin and Deutsche Bundesbank, regarding the recording of Relevant Voice Communications ("RVC") and how to request retrieval and play back of such communications.

Instinet is required to provide a Client access to RVC under MiFID II Article 16 (7) and MiFID II Delegated Regulation (EU) 2017/565 Article 76 (10) in accordance with German Stock Trading Act (Wertpapierhandelsgesetz WpHG) Section 83 (3). RVC herein means telephone-based communications involving Clients that are intended to result in a transaction including the reception, transmission and execution of client orders, even if those conversations or communications do not result in the conclusion of such transactions or in the provision of client order services.

These requirements and procedures relate to any entity who is a Client of IGG. If an order has been sent to Instinet for execution via an affiliated Instinet entity, you should contact the relevant Instinet affiliate who will liaise with Instinet on your behalf in order to retrieve the RVC, which will be provided to you upon request and kept for a period of five years and, where requested by the competent authority, for a period of up to seven years.

### Procedure

If a Client wishes to request access to a RVC, the Client's Compliance or Legal team must make the request to Instinet's Compliance Department via the following contacts:

*Email:* europe.compliance@instinet.com

*Letter:* Compliance Department, Instinet Germany GmbH, Rathenauplatz 1, 60313 Frankfurt am Main, Germany

Any request made to the Compliance Department must include the following information:

- The date and time of the call; and,
- The rationale and/or reason for the request.

The Compliance Department will locate the relevant communication, work with the Technology Department to create a copy of the recording, and provide an electronic copy of the RVC to the Client. The Compliance Department will also keep a record of each Client request for access to an RVC.

If there is anything in this document that you require further information or clarification on, please contact the Compliance Department using the above-mentioned contact details.

European Compliance, December 2020