Purpose

This procedure provides information to Clients of Instinet Europe Limited (“Instinet”) regarding the recording of Relevant Voice Communications and how to request retrieval and play back of such communications.

Instinet is required to provide a Client access to Relevant Voice Communications under:

- MiFID II Article 16(7), MiFID II Delegated Regulation Article 76 and
- SYSC 10A.1.14R

Relevant Voice Communications herein means telephone based communications involving the Client that are intended to result in a transaction including the reception, transmission and execution of client orders.

Scope

This policy applies to any entity who is a Client of Instinet Europe Limited (“Instinet” or the “Firm”). 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 relevant Voice Communications.

Procedure

If a Client wishes to request the playback of any Relevant Voice Communication, such Client’s Compliance or Legal team must make the request via email to Instinet’s Compliance Department (uk.compliance@instinet.co.uk) and include the following information:

- date and time of the call,
- reason for the request.

Compliance will extract the relevant communication, send it to the Client and keep a record of each playback request.

If there is anything in this policy that you require further information on, please contact Compliance.

European Compliance
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