



Market Data Policy of Bulgarian Stock Exchange (BSE) in the capacity of a market operator

The present Market Data Policy has been adopted and applied for the purpose of compliance of the activity of BSE as a market operator with the provisions of Ordinance № 73 of 28 July 2022 of the Financial Supervision Commission (the Ordinance).

The Market Data Policy of BSE has been published on the website of BSE in an easily accessible format. The following documents accessible via the same location on the BSE's website should be considered as a part of the present policy:

- [Market Data Transparency Obligation Disclosure](#)
- [Annex II – Template for publishing RCB information](#)

The Market Data Policy of BSE presents all relevant market data information, including the cost accounting methodology for setting the price of market data; the categories of customers and how the use of data is taken into consideration to set up the categories of customers; the applicable fees and terms and conditions for each use as well as the different types of agreements that may be concluded by each category of customers.

Cost accounting methodology for setting the price of market data

BSE has established an internal cost allocation model that allocates revenue and cost to specific products within the defined business units of the exchange. The production and dissemination of market data is to large extent performed using the same systems and infrastructure as for facilitating the trade execution services. BSE uses the XETRA trading system, operated by Deutsche Boerse, and Deutsche Boerse are the exclusive market data provider for BSE to foreign data-vendors. Hence a large part of the costs of the two business units are joint costs. BSE market data fees are reflecting the underlying costs accordingly, leaving a reasonable margin in line with the margin of the overall business of BSE.

Prices charged for the real-time market data provided by BSE and Deutsche Boerse are derived based on fair and reasonable terms to recover costs incurred for the whole process of creating and distributing market data plus a reasonable margin:

Key direct costs:

- Staff costs
- Depreciation and amortization
- Market data technology platform operating costs
- Remuneration to the Deutsche Boerse in their capacity of an exclusive market data provider for BSE to foreign vendors (net revenue share)

Key indirect costs:

- Property costs



- IT infrastructure costs

Categories of market data customers and respective applicable pricelists and agreements

Bulgarian Stock Exchange has a long-lasting agreement with Deutsche Boerse by virtue of which Deutsche Boerse act as the exclusive market data provider of BSE to data-vendors, respectively the customer categories and applicable pricelists and agreements are consistent with the confirmed international standards and practices applied by Deutsche Boerse in respect to the customers of their own market data. The BSE market data distributed by Deutsche Boerse meets all the requirements of the Ordinance for provision of the market data on a non-discriminatory and per-user basis as well as for keeping the data unbundled.

The customer category to which a potential client belongs is defined based on the following subsequently applied criteria:

I. Fee Model of the Market Data Dissemination Agreement

1. Differentiation based on Usage Types

Licenses are granted for the following usage types:

- Display Information Usage
- Non-Display Information Usage
- Onward Dissemination
- CFD Information Usage

2. Differentiation based on Customer Categories

Secondly, license fees depend on the applicable Customer Category licensee has chosen under the relevant usage license.

3. Unit of Count vs. Flat Fee

Thirdly, the specific fee to be paid depends either on the concrete usage (measurement via units of count) or shall be paid as a lumpsum amount. Discounts may be granted as stipulated in the relevant license agreement (Market Data Dissemination Agreement or Non-Display Agreement)

Price Lists to the Market Data Dissemination Agreement

Version 12_2 – effective as of 01 January 2023

https://www.mds.deutsche-boerse.com/resource/blob/3347708/67fafc73c58441b867d1ce08ce720f3c/data/MDDA_Price_List_12_2.pdf

II. Non-Display Agreement

Licenseses who are not interested in other usage types than the Non-Display Information Usage only need the Non-Display Agreement. With respect to the applicable fee model, the same logic applies as illustrated above with the deviation that only the usage type Non-Display Information Usage is of relevance.



Price Lists to the Non-Display Agreement Version 7_2 – effective as of 01 January 2023

https://www.mds.deutsche-boerse.com/resource/blob/3246812/7e9c1cff53e2a1dff1173280c0812469/data/NonDisplay_Price_List_7_2.pdf

III. Further information

In addition to the market data distributed by Deutsche Boerse BSE has developed additional information products to be provided solely to the BSE members, to the issuers whose instruments have been admitted to trading on any of the markets operated by BSE and to local media.

Information on those additional information products provided by BSE is available at:

<https://www.bse-sofia.bg/bg/data-dissemination-and-certificates>

and

<http://rss.bse-sofia.bg/>

IV. Provision of delayed data

Bulgarian Stock Exchange provides free access to any customer, including professional customers, market data 15 minutes after publication (hereinafter „delayed data“). The delayed data consists of „pre-trade market data“ and „post-trade market data“ freely accessible (no registration by the user is required) via the website of BSE:

<http://rss.bse-sofia.bg/download/bestOrders15minDelay/?O=D>

<http://rss.bse-sofia.bg/download/trades15minDelay/?O=D>

Delayed data of BSE meets the following requirements:

- It covers all markets organised by BSE;
- Post-trade delayed data contains all the relevant fields for the purpose of post-trade transparency, including flags, as specified in Annex I of the Commission Delegated Regulation (EU) No 2017/587 of 14 July 2016 supplementing Regulation (EU) No 600/2014 of the European Parliament and of the Council on markets in financial instruments with regard to regulatory technical standards on transparency requirements for trading venues and investment firms in respect of shares, depositary receipts, exchange-traded funds, certificates and other similar financial instruments and on transaction execution obligations in respect of certain shares on a trading venue or by a systematic internaliser (OJ L 87, 31.03.2017) as well as in Annexes I and II of the Commission Delegated Regulation (EU) No 2017/583 of 14 July 2016 supplementing Regulation (EU) No 600/2014 of the European Parliament and of the Council on markets in financial instruments with regard to regulatory technical standards on transparency requirements for trading venues



and investment firms in respect of bonds, structured finance products, emission allowances and derivatives;

- Pre-trade delayed data includes at least the first current best bid and offer prices available and the depth of trading interest at those prices;
- It is provided via a website in a machine-readable format;
- Pre-trade delayed data is available until the next more recent quote is available, or in case of lack of such update, until midnight of the business day following the date of publication;
- Post-trade delayed data is available to clients until midnight of the business day following the date of publication.

BSE will be entitled to charge clients for the use of delayed data when the client provides that data in unchanged form to third parties for a fee (including a general fee for accessing its services) or when the client using the delayed data creates and provides to third parties a value-added service under Art. 22, par. (2) of the Ordinance.

The present Policy has been adopted under a resolution of the Board of Directors of BSE under Record of Proceedings № 70 of 10 November 2022 and has come into force as from 11 November 2022.

The present Policy has been reviewed and updated on 11 January 2023