



Systematic Internaliser Commercial Policy

1. INTRODUCTION

Interactive Brokers Ireland Limited (IB) acts as a Systematic Internaliser (hereafter referred to as the "IB SI")¹ in respect of certain liquid² and illiquid equity-like instruments (i.e., shares, ETFs, depository receipts, certificates and other similar financial instruments) traded on a Trading Venue³. The Markets in Financial Instruments Regulation (Regulation 600/2014) (MiFIR) sets out the pre-trade transparency obligations applicable to SIs, including a liquid instrument obligation to make public firm quotes on a continuous basis during Normal Trading Hours^{4,5}. MiFIR permits SIs to decide which clients may access the SI's quotes; provided the determination is made in an objective and non-discriminatory manner. This Commercial Policy sets out the way in which clients may access IB SI quotes.

2. PUBLICATION OF SI QUOTES

IBIE makes public firm quotes in respect of the instruments in which it is an SI, these quotes are published on a regular and continuous basis during Normal Trading Hours. IB SI quotes are available on IBIE's website (<https://www.interactivebrokers.ie/en/trading/si-quotes.php>) in human and machine readable formats.

The minimum IB SI quote size for liquid instruments is at least 10% of each instrument's Standard Market Size and prices quoted by the IB SI reflect the prevailing market conditions for the financial instrument. Where the IB SI elects to publish quotes for non-liquid instruments, minimum quote sizes will not apply but prices will still reflect the prevailing market conditions for the financial instrument.

IBIE reserves the right to withdraw its SI quotes in exceptional market circumstances such as when:

- » The trading venue where the financial instrument was first admitted to trading or the most relevant market in terms of liquidity halts trading for that financial instrument;
- » The trading venue where the financial instrument was first admitted to trading or the most relevant market in terms of liquidity allows market making obligations to be suspended;
- » A competent authority prohibits short sales in the financial instrument.

3. ACCESS TO PUBLISHED QUOTES

Clients that satisfy IBIE's account opening criteria shall be permitted to access IB SI quotes, subject to IBIE's standard pre-trade risk controls. IB SI quotes can be accessed by clients through the IBKR Trader Workstation application.

Clients may direct orders to the IB SI or access the IB SI via the IBKR Smart Order Router (SOR). Directed orders and SOR orders executed by the IB SI may be subject to different commissions, refer to IBIE's website for up-to-date commission information (<https://www.interactivebrokers.ie/en/pricing/commissions-home.php>).

IBIE may, in certain circumstances, execute client orders at prices better than the IB SI quote. Any price improvement shall comply with the Markets in Financial Instruments Directive (Directive 2014/65) (MiFID II) tick size regime and all clients' orders are executed in a non-discriminatory manner, in compliance with IBIE's Order Execution Policy.

Trades executed with the IB SI will be subject to IBIE's published commission schedule.

4. In order to limit its risk exposure, IBIE may limit the number of transactions that it undertakes to enter with the same client at the published quote. In addition, IBIE may limit the total number of transactions from different clients at the same time where the number and/or volume of orders sought by clients considerably exceeds the norm and the execution of which would expose IBIE to undue risk. Any such limitations will not result in the discriminatory treatment of clients and will be enacted in accordance with IBIE's risk management policies.

IBIE may be unable to execute transactions in some financial instruments where applicable legal or regulatory restrictions prevent it from doing so.

Notes:

1. An investment firm which, on an organised, frequent, systematic and substantial basis, deals on own account when executing client orders outside a Regulated Market, Multilateral Trading Facility (MTF), or Organised Trading Facility (OTF).
2. As determined by ESMA.
3. Regulated Market, MTF or OTF.
4. Normal Trading Hours are in line with the continuous trading sessions of the most relevant market in terms of liquidity for each financial instrument. Normal Trading Hours do not include periods outside of continuous trading such as halts, suspensions and auctions.
5. As determined by ESMA.