

Ex Ante Costs and Charges Disclosure: Global Markets Financial Instruments

VTB Capital PLC (“VTBC”) is providing this information concerning ex-ante costs and charges which we are required to disclose to our clients under Article 24(4)(c) of Directive 2014/65/EU (MiFID II).

Cash Equity Products – Commission Based Trading

When VTBC provides a client with a price to buy or sell a financial instrument on a commission basis, the commission that VTBC shall charge shall be set out in the rate card that is agreed between VTBC and the client. From time to time the commission on a particular transaction might differ to the agreed rate card. On such occasions, the commission will be agreed between VTBC and the client on a case by case basis.

The rate card will be reviewed from time to time as agreed between VTBC and the client.

While rate cards are negotiated on an individual client basis, on average our clients are charged a commission rate between 8.0 and 9.0 bps.

Emerging Market Bonds – Dealing as Principal on a Non-Commission basis

When VTBC provide a client with an ‘All In’ price to buy or sell a financial instrument, in VTBC’s capacity as principal on a non-commission basis, it is a VTBC risk price. As such, VTBC do not charge any additional costs or charge to the client.

Structured Products & Derivatives – Instances where there are cost and/or charges to disclose

When VTBC provides a client with a price which is not an ‘all in’ price, the costs and charges associated with that transaction shall be the difference between **the final client price** and **the instrument price** on that day (mid-price).

The total price paid by the client for a financial instrument may include but is not limited to the factors set out below:

Instrument Price (mid-price) + Sales Margin (cost and charges) = Final Client Price	
<i>Instrument Price Factors</i>	<i>Sales Margin factors (include but not limited to)</i>
Observable Market prices	Product and service preferences
Executed Transaction	Size and value of client’s trading activities
Volatility data	The frequency in which the client trades
Other Market data	The products that the client trades
Internal Models	The type of product the client trades
Observable trade flows	Credit and funding

The extent to which these factors reflect the VTBC’s Cost and Charges will vary depending on the nature of the financial instrument and the transaction.

Upon request, the Bank can disclose the sales margin (costs and charges) associated with an individual transaction by contacting their VTBC representative.

Ex Post Cost and Charges Disclosures

A client can request an ex post Cost and Charges disclosure in the applicable products, at any time, by contacting their VTBC sales representative.