

# ANZ LONDON SYSTEMATIC INTERNALISER POLICY DISCLOSURE

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AUSTRALIA AND NEW ZEALAND BANKING GROUP LIMITED LONDON BRANCH  
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## 1. INTRODUCTION

Pursuant to Chapter 6 of the FCA Handbook, which implements the Systematic Internaliser requirements of the Markets in Financial Instruments Regulation – Regulation 600/2014, Australia and New Zealand Banking Group Limited, London Branch (ANZ London) declares that it will act as a Systematic Internaliser (SI) in the UK in certain instruments, when dealing with its clients outside of a Regulated Market, Multilateral Trading Facility or Organised Trading Facility and where the particular instrument is Traded on a Trading Venue (TOTV).

The purpose of this policy is to set out the basis on which ANZ London will operate in its capacity as a Systematic Internaliser (“SI”).

## 2. SCOPE

ANZ London will act as a SI for all TOTV instruments, in which it provides quotes upon request, in the following:

- Foreign Exchange Derivatives;
- Interest Rate Derivatives (excluding USD, GBP, EUR, JPY currencies);
- All Bond Types (excluding sovereign bonds from USD, GBP, EUR, JPY sovereign issuers).

Instruments that are TOTV will be listed in the FCA Financial Instrument Reference Data System (FCA FIRDS) administered by the Financial Conduct Authority (FCA).

ANZL is the operating MIC allocated to ANZ (Australia and New Zealand Banking Group) Systematic Internaliser in the UK.

## 3. SUMMARY OF ANZ LONDON’S OBLIGATIONS AS AN SI

As an SI pursuant to MIFIR, ANZ London has certain obligations which include:

1. being the designated reporting party for MIFIR trade reporting and ensuring such reporting is achieved; and
2. in certain instances, where an instrument is deemed “liquid” by FCA; making certain quotes it might make to its clients public on a pre-trade basis (known as “pre-trade transparency”). ANZ London may make that same firm quote available for other clients to trade, pursuant to certain restrictions detailed herein.

### 3.1 Post Trade Reporting

When trading as an SI with a client, ANZ London will fulfil the post trade transparency reporting requirement under MIFIR for any trade which is eligible for trade reporting.

### 3.2 Pre-Trade Transparency

- 3.2.1 ANZ London streams indicative prices in a number of instruments via multiple multi-vendor platforms. ANZ London also has channels open to clients who wish to face a dealer for their transaction execution needs. Generally, these price streams are indicative quotes only, and not firm and executable. Clients may refer to the Terms of Business for Professional Clients and Eligible Counterparties (ANZ London’s “Terms”) and other product terms and relevant disclosures for more information on how ANZ London may interact with its clients in request-for-quote markets. Our Disclosures can be found here: <https://www.anz.com/corporate/rates-fees-terms/disclosures/>
- 3.2.2 When ANZ London is acting as a SI in an instrument, and that instrument meets the thresholds set for pre-trade transparency in terms of liquidity and trade size; ANZ London will make such quotes public. These quotes will be made public through Bloomberg’s Approved Publication Arrangement (“APA”).
- 3.2.3 Notwithstanding ANZ London’s status as SI in a particular instrument, ANZ London only provides quotes (firm or otherwise) upon request. Quotes made public through Bloomberg’s APA are representative of a point in time, and will only be updated in the APA if a new quote in that same instrument is provided to a client. Hence public quotes may become out of date as market conditions change. ANZ London may update its quotes at any time, at its sole discretion. ANZ London may withdraw any quote under exceptional market circumstances, based on its discretion.

### 3.3 Client Tiering:

For each instrument in which ANZ acts as an SI, the relevant business line reserves the right to establish tiers of clients based on commercial considerations such as the following factors:

- The client’s trading behaviour and strategy;
- ANZ London Branch management strategy or priority;
- Credit use, capital costs and counterparty risk;
- The scope and value of the client to ANZ London Branch;
- Client volume of trades executed with ANZ London Branch.

The weight given to the above factors may vary based on the instrument.

Each line of business maintains its own client tiering and may change the tier of a client at any time based on a change to the commercial consideration discussed above.

ANZ reserves the right to maintain multiple client tiers in the instruments in which it acts as an SI.

### **3.4 ANZ London Commercial Policy For Access To Quotes**

With respect to the instruments in which ANZ London acts as a SI, and which ANZ London agrees to provide quotes, only for certain Bond instruments are deemed liquid by FCA. ANZ London will make required updates to this disclosure document where there is a change to the liquidity status of Bonds and other asset classes.

### **3.5 Latency and Timeframes**

Notwithstanding ANZ London's right to amend a quote at any time, quotes are only firm and valid for a specific time frame which may differ from instrument to instrument, and which may differ for each individual instrument from time to time according to market conditions.

### **3.6 Permissible Transaction Volume for Firm Quotes**

ANZ London traders will maintain their own concept of liquidity and depth of market at any given price. As an active participant in ANZ London's chosen markets, ANZ London will commit to dealing up to certain volumes, expressed as multiples of standard market parcel ("SMP") for the particular instrument. The total volumes available at a given price for a particular instrument are subject to change at short notice, according to market conditions and available liquidity.

### **3.7 Number of Transactions ANZ London May Agree to Enter At The Firm Quoted Price**

As well as limits as to the time and volume with which ANZ London will agree to deal at a firm quote as an SI, ANZ London may also limit the number of additional transactions it enters into at the firm price following the initial firm quote. The default limit is 1 additional transaction.

## **NOTES**

This notice and ANZ London's role as an SI is subject to change any time, at short notice, and at ANZ London's sole discretion. For more specific information regarding the role of ANZ London as an SI and how it might impact the instruments in which clients deal with ANZ London, clients may discuss this with their ANZ Relationship Manager or Sales representative.

Notwithstanding this notice and ANZ London's role as an SI, ANZ London's Terms continue to apply to its relationship with clients, including any other disclosures or Additional Terms (as defined in ANZ London's Terms).

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## **REGULATORY INFORMATION**

ANZ is authorised and regulated by the Australian Prudential Regulation Authority and the Australian Securities and Investments Commission. In the United Kingdom, ANZ carries on business through its London branch at 25 North Colonnade, Canary Wharf, London E14 5HZ. In the United Kingdom, ANZ London is authorised and subject to limited regulation by the Prudential Regulation Authority (20 Moorgate, London EC2R 6DA) and subject to regulation by the FCA (12 Endeavour Square, London E20 1JN). Details about the extent of ANZ London's regulation by the Prudential Regulation Authority are available from ANZ London on request.

