

RTS 28 Article 3.3 Interest rate derivatives and currency derivatives

- (a) All interest rate and currency derivative transactions with clients are executed against the own book of NIBC Bank NV and are not routed to an execution venue. The reason is that these transactions are of a bespoke nature and not listed tailored to the need of each individual client, therefore unable to be executed on a venue.
- (b) All interest rate and currency derivative transactions with clients are executed against the own book of NIBC Bank NV and not routed to execution venues. A Conflicts of interest identified are NIBC Bank NV acts as counterparty to the transaction and specific circumstances the derivative product executed is tied to a credit product granted by the bank.
- (c) N.a.
- (d) N.a.
- (e) N.a.
- (f) No other criteria were given precedence over immediate price and cost when executing retail clients orders
- (g) NIBC Bank NV has used specific tools to determine the theoretical basis price of bespoke derivative products. These tools include both internal and external systems. The internal pricing models have been validated by NIBC's Risk Management department. To determine the price quoted to the client a discretionary margin is added to the theoretical basis price. This margin is a compensation for potential losses as a result of a default, funding costs of collateral of market hedges, handlings costs and a commercial margin.
- (h) NIBC Bank NV has not used the output of a consolidated tape provider.