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MORGAN STANLEY

Commercial Policy for access to quotes in non-equity instruments

This disclosure is part of our ongoing effort to provide transparency to our clients on our business practices. In accordance with applicable legal and regulatory requirements, Morgan Stanley & Co. International Plc and Morgan Stanley Europe S.E. (together, “**Morgan Stanley**”) have prepared this document to provide clients with appropriate information on the access to quotes published when Morgan Stanley is acting as a Systematic Internaliser (“**SI**”) in bonds, structured finance products, emissions allowances and derivatives (“**Non-Equity Instruments**”). Morgan Stanley has opted in to be an SI in Non-Equity Instruments that are traded on an EU trading venue.

Where Morgan Stanley is a SI in a Non-Equity Instrument deemed liquid by ESMA that is considered to be traded on a trading venue and agrees to provide a firm quote which is under the Size Specific to the Instrument (“**SSTI**”) for that Non-Equity Instrument, Morgan Stanley will publish its quote via an Approved Publication Agreement (“**APA**”). Morgan Stanley has appointed Tradeweb as its APA, and our quotes will be visible at their website: <https://www.apapremium.tradeweb.com>. Should you wish to execute against a published quote, please contact your usual Morgan Stanley representative.

Access to SI Quotes

Morgan Stanley is allowed to limit access to published firm quotes on an objective, non-discriminatory basis.

Objective, non-discriminatory differentiation may be applied based on factors such as:

- counterparty risk (including, but not limited to, the terms of a client’s credit support annex);
- credit quality;
- counterparty or trading type (including, but not limited to, counterparties that are trading via algorithms, acting as intermediaries/inter-dealer broker or liquidity providers in the instrument being quoted).

Limits on executions

Morgan Stanley is allowed to establish transparent limits on the number of executions it permits against a published quote. Morgan Stanley will execute against a published quote with any client that has access to the quote. If the client who executes on the published quote is not the client who requested the quote, then Morgan Stanley will make the quote available for execution by the client that requested the quote until the quote expires, unless the subsequent execution with the requesting client would result in Morgan Stanley moving from a long to a short position.

Morgan Stanley may make some firm quotes only executable by the requesting client/entity (e.g. unwinds, novations, buy-backs). In these situations, Morgan Stanley will publish these quotes in a form determined by the APA that indicates they are non-executable.

Firm quotes will be published and executable for a period of time appropriate to the relevant instrument. Morgan Stanley may update a published firm quote at any time. Morgan Stanley may withdraw a published firm quote during exceptional market conditions.