VORVEL
TRADING FREEDOM

VORVEL SIM S.p.A.

COST DETERMINATION METHODOLOGY FOR THE PRODUCTION AND DISSEMINATION OF MARKET DATA

pursuant to Article 22 of Delegated Regulation (EU) 2025/1156

1. Purpose and legal basis

This document describes the criteria and methodology applied by Vorvel SIM S.p.A. to determine the costs of producing and disseminating Market Data, in accordance with Articles 2, 3 and 22 RD 1156.

This analysis is prepared in accordance with the taxonomic definitions and requirements of Article 2 of Delegated Regulation (EU) 2025/1156, and of Section 3 of the related Annex II.

2. Cost categories considered

For the purposes of determining fees, Vorvel SIM considers exclusively the costs connected with the production and dissemination of Market Data, classified according to the five categories set out in Article 2, paragraph 1, RD 1156:

Cost category	Description
Infrastructure costs	Trading and data dissemination technology platforms, software licences, hosting, dedicated hardware
Connectivity costs	Communication networks, distribution links to clients and Info Providers

Personnel costs	Personnel dedicated to the production, dissemination, technical monitoring and client support relating to Market Data
Financial costs	Depreciation, impairments and cost of capital relating to dedicated or shared investments
Other costs	Administrative and support costs directly connected with the service

3. Distinction between direct costs and shared costs

Consistently with Article 2, paragraph 1, RD 1156, Vorvel SIM distinguishes:

- Direct costs: costs entirely and unambiguously attributable to the production and dissemination of Market Data, which do not require any allocation criterion;

- Shared costs: structural and operating costs generated by shared resources, absorbed simultaneously by both the core trading services (order matching engine) and the Market Data production and dissemination services, and therefore to be allocated among the different functions on the basis of objective criteria;

- Allocation Criteria (Drivers): objective, technical and non-discriminatory parameters used to isolate the share of shared costs to be attributed to the Market Data function.

4. Scope of costs: exclusions

Before identifying the relevant shared costs, Vorvel SIM excluded from the scope the cost components that, by their nature, have no connection with the production and dissemination of Market Data, including:

- the trading surveillance system;
- the integration modules with external settlement and post-trading systems;
- the regulatory reporting modules (for example, transaction reporting pursuant to Article 26 MiFIR);
- connectivity dedicated to individual participants for purposes other than the dissemination of Market Data;
- the components relating to instrument reference data not falling within the scope of Market Data pursuant to the Market Data Policy.

In particular, the process of identifying the Eligible Shared Costs involved the application of the following adjustments:

- Total exclusion of unrelated costs (0% relevance): full removal of specialised modules and services not related to the generation of market data (for example, third-party connectivity, CC&G settlement modules, transaction regulatory reporting services pursuant to MiFID II, or instrument reference data control applications).
- Application of adjustments to the costs of the Surveillance module (18% reduction) and to other costs incurred (70% reduction).

5. Criterion for allocating shared costs

For the cost components shared between trading services and Market Data services, Vorvel SIM has developed a technical and objective allocation driver, based on the mapping of the processing (transactional) steps of the trading system.

Each processing step was classified according to its impact on the technical components of the system dedicated respectively to trading and to the production/dissemination of Market Data. Steps of a purely informational nature (order book recalculation and publication of Market Data) were isolated and weighted against the total of all the system's processing steps, thereby obtaining an objective and verifiable percentage of the incidence of Market Data on the shared costs of the trading infrastructure.

The same principle — actual and verifiable incidence, rather than allocation based on the revenue generated by the different services — was also applied to the allocation of shared personnel costs and financial costs, on the basis of an estimate of the actual effort dedicated to the production and dissemination of Market Data.

In no case were shared costs allocated on the basis of the revenue generated by the different services and activities.

6. Resulting allocation percentages

On the basis of the methodology described above, the following percentages of shared costs are attributed to the production and dissemination of Market Data:

Type of shared cost	Percentage attributed to Market Data
Infrastructure (Software Licences, Infrastructure, Development and Support)	28.57%
Personnel (Administrative support and client assistance provided by Vorvel SIM)	50% of 1 FTE
Financial costs (depreciation)	28.57%*

* Same rate used for shared infrastructure

The percentages indicated above are reviewed at least annually, pursuant to Article 2, paragraph 7, RD 1156, and updated in the event of significant changes in the technical architecture, in supply contracts or in the organisation of dedicated personnel.

7. Margin

Pursuant to Article 22, paragraph 3, RD 1156, Vorvel SIM states the following regarding the inclusion of a margin in Market Data fees:

for financial year 2025, Market Data fees do not incorporate any positive operating margin, as revenue is lower than the costs of production and dissemination determined in accordance with this methodology.

The situation is reviewed annually, on the occasion of the review of this methodology, pursuant to Article 2, paragraph 7, RD 1156.

Should a positive margin be included in the future, Vorvel SIM will update this section specifying how its reasonableness is ensured, pursuant to the criteria set out in Article 3, paragraph 2, RD 1156 (expression as a percentage of total costs; non-disproportionality with respect to such costs; comparability with Vorvel SIM's overall operating margin as an MTF operator).

8. Annual review

This methodology, together with the technical drivers and the allocation percentages referred to in Section 6, is subject to formal review at least annually, carried out by the Board of Directors of Vorvel SIM, in order to ensure its constant alignment with the technological evolution of the trading venue and with the contractual structure of suppliers.