

5.13A Where a book update is stated as being in accordance with “ICMA 5.13A” (anticipated to be in a Europe context), this means:

*December
2020*

- (a) any arm’s length trading desk orders (in line with typical trading desk sizes) were (if material in aggregate) included in the book update under a segregated heading of bookrunner demand;
- (b) any bookrunner backstop positions, trading desk orders specifically requested by issuers and/or syndicate and orders from DCM/syndicate desks (regardless of approvals received) were (if material in aggregate) not included in any form in the book update (even under any segregated heading of bookrunner demand);
- (c) any orders from a bookrunner’s different desk constituents were split out into component parts to enable appropriate classification;
- (d) any orders known, or reasonably suspected (in line with internal escalation requirements), to be inflated were not included in the book update;
- (e) orders (whether ‘account X’ orders or otherwise) were entered into the orderbook as a single, separate line item for each third party investor order;
- (f) all third party investor orders were entered into the orderbook either (as appropriate) under their own name or as ‘account X’.

5.13B Where a book update is stated as being in accordance with “ICMA 5.13B” (anticipated to be in an Asia context), this means:

*December
2020*

- (a) any orders from bookrunner internal treasury / balance sheet management and arm’s length trading desk orders (in line with typical trading desk sizes) were (if material in aggregate) included in the book update under a segregated heading of bookrunner demand;
- (b) any bookrunner backstop positions, trading desk orders specifically requested by issuers and/or syndicate and orders from DCM/syndicate desks (regardless of approvals received) were (if material in aggregate) not included in any form in the book update (even under any segregated heading of bookrunner demand);
- (c) any orders from a bookrunner’s different desk constituents were split out into component parts to enable appropriate classification;
- (d) any orders known, or reasonably suspected (in line with internal escalation requirements), to be inflated were not included in the book update;
- (e) orders (whether ‘account X’ orders or otherwise) were entered into the orderbook as a single, separate line item for each third party investor order;
- (f) all third party investor orders were entered into the orderbook either (as appropriate) under their own name or as ‘account X’.