



## **Zagreb Stock Exchange**

### **Market Data Transparency Obligation**

November 2025

Article 11 of Commission Delegated Regulation (EU) 2017/567 of 18 May 2016 supplementing Regulation (EU) No 600/2014 of the European Parliament and of the Council with regard to definitions, transparency, portfolio compression and supervisory measures on product intervention and positions requires trading venues to disclose the price and other terms and conditions for the provision of the market data in a manner which is easily accessible to public.

This document sets out all of the relevant disclosures for the Zagreb Stock Exchange required by transparency obligation.

LEGAL BASIS	CONTENTS			
Article 89(2)(a) of Delegated Regulation (EU) No2017/565 and Article 11(2)(a) of Delegated Regulation (EU) No 2017/567	<b>Price List</b>			
	<p>Zagreb Stock Exchange price list is available on the following link:  <a href="https://zse.hr/en/service-pricelist/254">https://zse.hr/en/service-pricelist/254</a></p> <p>Zagreb Stock Exchange <i>real-time market data</i> is disseminated exclusively via the Vienna Stock Exchange ADH data feed as of 1 April 2017. Details on Zagreb Stock Exchange real-time market data fees can be found in the Market Data Agreement available on the following link:  <a href="https://www.wienerborse.at/uploads/u/cms/files/market-data/en-market-data-agreement-2025.pdf">https://www.wienerborse.at/uploads/u/cms/files/market-data/en-market-data-agreement-2025.pdf</a></p>			
Article 89(2)(b) of Delegated Regulation (EU) No 2017/565 and Article 11(2)(b) of Delegated Regulation (EU) No 2017/567	<p>Information on future price changes shall be published at least 90 days before the revised price list enters into force.</p> <p>On 15 March 2025, the new Zagreb Stock Exchange service price list came into effect.</p>			
Article 89(2)(c)(i-iii) of Delegated Regulation (EU) No 2017/565 and Article 11(2)(c)(i-iii) of Delegated Regulation (EU) No 2017/567	<b>Market Data Content Information</b> Period covered: 01/01/2024 - 31/12/2024			
	<b>Asset Class</b>	<b>1) Number of instruments covered</b>	<b>2) Total turnover of instruments covered (EUR)</b>	<b>3) Pre-trade/post-trade market data ratio</b>
	Equity instruments (shares, ETFs, DRs, certificates, other equity-like financial instruments)	83	386.390.253	3,0160
	Bonds	31	42.162.163	4,8415
	ETCs ETNs	4	4.908.516	0
	SFPs	0	0	0
	Securitised derivatives	0	0	0
	Interest Rate Derivatives	0	0	0
	Credit Derivatives	0	0	0
	Equity derivatives	0	0	0
	FX derivatives	0	0	0
	Emission allowances derivatives	0	0	0
	C10 derivatives	0	0	0
	Commodity derivatives	0	0	0
	CFDs	0	0	0

LEGAL BASIS	CONTENTS			
	Emission allowances	0	0	0
Article 89(2)(c)(iv) of Delegated Regulation (EU) No 2017/565 and Article 11(2)(c)(iv) of Delegated Regulation (EU) No 2017/567	Information on any data provided in addition to market data		Data on Zagreb Stock Exchange indices.	
Article 89(2)(c)(v) of Delegated Regulation (EU) No 2017/565 and Article 11(2)(c)(v) of Delegated Regulation (EU) No 2017/567	Date of the last licence fee adaption for market data provided		7/1/2023	
Article 89(2)(d) of Delegated Regulation (EU) No 2017/565 and Article 11(2)(d) of Delegated Regulation (EU) No 2017/567	Total Market Data Revenues (EUR)		355.923	
	Market Data Revenues as a proportion of total Revenues (%)		15,72%	
Article 89(2)(e) of Delegated Regulation (EU) No 2017/565 and Article 11(2)(e) of Delegated Regulation (EU) No 2017/567	Information on cost accounting methodology: year 2024			
	Information on how the price was set, including the cost accounting methodologies used and information about the specific principles according to which direct and variable joint costs are allocated and fixed joint costs are apportioned		The price of Zagreb Stock Exchange market data is based on the cost of producing and disseminating market data and include a reasonable margin (cost plus methodology).  Two groups of costs are associated with market data dissemination: direct costs and indirect costs. Direct Costs are costs that can be specifically allocated to providing data vending services: <ul style="list-style-type: none"><li>• Personnel costs</li><li>• Third party fees</li><li>• Support costs</li></ul> Indirect costs are costs used by multiple activities, and which cannot therefore be assigned only to market data services. Indirect costs include: <ul style="list-style-type: none"><li>• Rent of premises</li><li>• Post and telephone services</li><li>• Utility expenses</li></ul>	