

## Service Overview

Cavendish Markets provides energy-focused, broking services. Cavendish Markets provides broking services in physical gas and power products in the European and UK wholesale markets, which fall under the REMIT regulation. Cavendish Markets is an ACER registered Organised Market Place (“OMP”). These activities are supervised within the Netherlands by the Authority for Consumers and Markets (Autoriteit Consument en Markt) (“ACM”).

Cavendish Markets arranges deals via voice-broking, in a range of products, none of which are classified as financial instruments. Cavendish Markets services are only suitable for, and available to, entities that can be classified and wish to be treated as a professional client. Specifically, Cavendish Markets services are not suitable for retail clients or individual investors.

### *Broking Services*

#### *Bilateral Introductory Service*

Cavendish Markets arranges deals in physical gas and power products in the European and UK wholesale markets, for commercial purposes. These deals involve flexible, OTC contracts and do not include any contracts supported by a Recognised Investment Exchange (“RIE”). For the more commonly traded OTC contracts, Cavendish Markets supports multilateral, voice markets. For the more bespoke products, deals are arranged on a bilateral basis.

Once a deal is arranged, Cavendish Markets introduces the parties via name-passing, for bilateral execution, subject to contract and credit, often on EFET terms. These deals can have significant counterparty-specific credit risk, are physical in nature, and are considered to be for commercial purposes.

These products are not considered, nor treated, as financial instruments. Instead, they fall under the REMIT regulation. Cavendish Markets is an ACER registered OMP. Cavendish Markets reports transactions to ACER via the Equias eRR Recognised Reporting Mechanism (“RRM”). To benefit from our services, the client must be signed-up with Equias.

#### *Implicit Allocation*

Cavendish Markets is an Implicit Allocation partner for the BBL and IUK interconnector gas pipelines. As such, Cavendish Markets has the right to facilitate the allocation of gas transmission capacity for these pipelines, in accordance with the Implicit Allocation Mechanism (“IAM”), as specified in the Capacity Allocation Mechanism (“CAM”) network code. Sales via the IAM involve the allocation of capacity directly from the Transmission System Operator (“TSO”) to the client. In order to participate in the IAM, the client must be a registered shipper of the TSO.

#### *Financial Regulatory Status*

Cavendish Markets is not financially regulated and does not operate an Organised Trading Facility (“OTF”) or any other form of MiFID Trading Venue.

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### *Client Onboarding*

Our terms of our services are laid out in our Energy Broking Agreement. Any potential new clients will be provided a draft of this agreement, to be agreed and executed, prior to the start of any business relationship. If the planned business activities require it, we will also provide a draft of our REMIT Reporting Agreement.

Cavendish Markets has a responsibility to know with whom it is conducting business and to ensure their services are not used for money laundering or terrorist financing. As such, all new clients are required to go through an onboarding process. We therefore ask all new clients to provide a range of information so that we can conduct our client due diligence. This is requested via a KYC Questionnaire. We cannot conduct any business with a client before this process is complete. We also are obliged to revisit and review this information periodically, so will re-request this information from time to time.

### *Methods of Communication*

In the course of providing broking services, Cavendish Markets will receive and transmit client orders. Orders are received and transmitted via a number of recorded media. Specifically, the Eikon and ICE Chat instant messaging services, the Cloud 9 VoIP service, normal telephonic services, email and CM's own PLEXHUB bulletin-board. Other communication may also occur via postal and courier services. Cavendish Markets services are provided in English only.

### *Standardised Documents*

Once an OTC deal has been arranged, the counterparties will receive a standardised deal confirmation file, by email, in a PDF, XML and JSON format, containing all the required information. Furthermore, clients can request to receive a similar paper confirmation following the completion of an exchange traded deal, on a case-by-case basis. Additionally, clients will receive daily summaries of all their arranged deals. These standardised "trade recap" files are provided on a T+0 basis, at the end of the trading day. These are again sent by email, in PDF, XML and JSON formats. To receive the trade recaps, the client must provide Cavendish Markets an appropriate recipient email address.

### *Acting with Integrity*

Cavendish Markets aims to deliver the highest levels of professional service. Cavendish Markets has a responsibility to treat its clients honestly, fairly and professionally, in accordance with the best interests of its clients. All clients are treated equally.

In the course of providing broking services, Cavendish Markets both receives and transmits orders from and to clients. These orders are all treated homogenously. Furthermore, Cavendish Markets strives to ensure that all the deals it arranges are suitable and reflect the intentions of the client. Cavendish Markets will always act in accordance with the best interests of their clients when transmitting client orders to other entities for execution. A copy of our Best Execution and Order Handling Policy is available to clients, on request.

Care is taken to ensure any conflicts of interest are identified, managed and mitigated. Should any material conflicts of interest, either actual or potential, remain, Cavendish Markets has a duty to declare these clearly, to



you, before providing you any further services. A copy of our Conflicts of Interest Policy is available to clients, on request.

### Privacy

We take your privacy seriously. Before signing-up to our services, whilst using our website, your privacy is protected in accordance with our Website Privacy Policy (<https://www.cavendishmarkets.com/privacy-policy>).

Should you have a need for our services and pass our due diligence criteria, and are onboarded as a client, your privacy will be protected by our Privacy Policy, a copy of which is available to clients, on request. Cavendish Markets takes all reasonable measures to ensure the security of your personal data. The Privacy Policy includes details of what personal data will be processed, why we need to process these data and the duration we will store these data, after the initial processing use has ended.

### Contacting Us & Complaints Handling

#### Cavendish Markets

Website:	<a href="https://www.cavendishmarkets.com/">https://www.cavendishmarkets.com/</a>
Postal Address:	Cavendish Markets B.V. Herengracht 420, 1017 BZ, Amsterdam Netherlands.
Phone:	+31 (0)20 299 3254
Email:	<a href="mailto:support@cavendishmarkets.energy">support@cavendishmarkets.energy</a>

Please email all types of enquiries (including complaints) to: [support@cavendishmarkets.energy](mailto:support@cavendishmarkets.energy). Your message will be promptly dealt with. While we strive to ensure there are none, any complaints will be taken extremely seriously. All complaints will be handled by the Management Board. Alternatively, our UK telephone number and alternative postal addresses are also given at the top and bottom of the page, respectively.

#### Authority for Consumers and Markets

Website:	<a href="https://www.acm.nl/">https://www.acm.nl/</a>
Postal Address:	Authority for Consumers and Markets (ACM) PO Box 16326 2500 BH, The Hague Netherlands.
Phone:	+31 (0)70 722 2000
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