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AMSTERDAM ATLANTA BEIJING Via E-Mail: secretariat@cesr-eu.org BONN BRASILIA The Committee of European Securities Regulators BRUSSELS 17 Place de la Bourse BUDAPEST BUENOS AIRES 75082 Paris Cedex 02 France CANBERRA Call for Evidence (Ref. CESR/04-323) 29 June Re: 2004 — Formal Request for Technical Advice on Possible Implementing Measures on the Directive on Markets in Financial Instruments Directive DALLAS (Directive 2004/39/EC) Ladies and Gentlemen: HELSINKI HONG KONG Bloomberg L.P. ("Bloomberg") and Bloomberg Tradebook ISTANBUL Europe Limited ("Bloomberg Tradebook Europe") appreciate the opportunity JERUSALEM to respond to CESR's Call for Evidence as CESR prepares its advice in response to the European Commission's second set of mandates on legislative KUALA LUMPUR LIMA measures to implement the Markets in Financial Instruments Directive (the "MiFID Directive").1 LOS ANGELES MANILA MELBOURNE Our comments address certain of those issues with respect to MEXICO CITY MILAN which DG Internal Market has requested that CESR provide technical advice MONTERREY MOSCOW on possible implementing measures. We hope our comments will prove useful to CESR in its work. NEW YORK OSAKA OTTAWA 1. **MANDATE** PARIS PORTLAND 3.2 Definition of "Investment advice" (Art. 4(4)) — RIO DE JANEIRO provide technical advice on possible implementing measures on the definition ROME SACRAMENTO of "investment advice" and in particular on the criteria for differentiating a personal recommendation from: SAO PAULO SEATTLE SHANGHAI a) General recommendations,

Ref: CESR/04-323 (29 June 2004).

WASHINGTON DC
WELLINGTON
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ZURICH

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- b) Marketing communications,
- c) Information given to the clients or from,
- d) Simple offer,
- e) The activities carried out by tied agents.

RESPONSE

- a) We believe investment advice should refer to advice or recommendations directed at specific investors (as opposed to generic publications) with respect to the purchase, sale or exchange of securities or other instruments or with respect to specific investment strategies or asset allocations.
- b) and c) As such, investment advice should be clearly distinguished from (i) research, including third-party research, (ii)market information such as real-time data feeds and (iii) analytical tools for the professional investor, such as those provided by Bloomberg or Reuters.
- d) With respect to institutional customers, we respectfully recommend that a distinction be drawn between a solicitation and a recommendation. For example, a solicitation to engage in a block transaction does not necessarily express or imply a statement regarding the suitability of the block trade for the particular customer and, in light of the sophistication of the investor, should not be construed as investment advice.

If a customer informs a dealer that he or she is looking for a security meeting criteria the customer has specified, such as a fixed-income security with a certain rating, duration and yield, and the dealer returns to the customer with suggestions of one or several securities that match the criteria the customer has specified, we believe such suggestions should not be deemed investment advice.

2. MANDATE

3.3.2.1 Suitability test (Article 19, Section 4) — provide technical advice on possible implementing measures on following issues:

- a) Define the criteria for assessing the minimum level of information that should be obtained from the client regarding his knowledge and experience in the investment field, his financial situation and his investment objectives.
- b) Determine the criteria for assessing, on the basis of the information received, the suitability of the investment service or financial instrument for the client or potential client.

RESPONSE

In the United States, as a general proposition (outside the context of options and certain other derivatives), suitability tests apply only where a recommendation is being made to a customer to purchase, sell or exchange a security. An investment firm does not have suitability obligations in relation to its customers if the firm does not make investment recommendations and is solely an order taker (as is the case, for example, with an execution-only service provided by a discount broker). We respectfully suggest that standard would be appropriate under the ISD as well.

Where recommendations are being made and the investment firm should be subject to a suitability obligation, the requirement to assess suitability with respect to an institutional customer should relate solely to information the customer has provided to the investment firm. Many institutional customers may be unwilling to disclose their assets, investment strategies, etc. to a broker. In such cases, if the investment firm has reason to believe the customer is a sophisticated market player, able to understand and appreciate investment strategy and the risks of investing, we think the investment firm should not be obliged to turn the customer down but should be allowed to make recommendations that are consistent with what the customer has said he or she is interested in purchasing.

U.S. law takes a similar approach in applying suitability obligations in the context of institutional customers. Rule IM-2310-3 of the National Association of Securities Dealers, Inc. (the "NASD") provides that the two most important considerations in determining the scope of a member's suitability obligations in making recommendations to an institutional customer are the customer's capability to evaluate investment risk independently and the extent to which the customer is exercising independent judgment in evaluating a member's recommendation.

CESR may wish to recommend to the Commission the following criteria (which the NASD recognizes as relevant) for assessing the capability of a institutional customer to evaluate investment risk independently:

- the use of one or more consultants, investment advisers or bank trust departments;
- the general level of experience of the institutional customer in financial markets and specific experience with the type of instruments under consideration;
- the customer's ability to understand the economic features of the security involved;
- the customer's ability to independently evaluate how market developments would affect the security; and
 - the complexity of the security or securities involved.

We suggest that determining whether a customer is making independent investment decisions will require an inquiry into the nature of the relationship between the member and the customer. Relevant considerations CESR may wish to recommend to the Commission may include:

- any written or oral understanding between an investment firm and the customer regarding the nature of the relationship between the investment firm and the customer and the services to be rendered by the customer;
- the presence or absence of a pattern of acceptance of an investment firm's recommendations;
- the use by the customer of ideas, suggestions, market views and information obtained from other members or market professionals, particularly those relating to the same type of securities; and
- the extent to which an investment firm has received from the customer current comprehensive portfolio information in connection with discussing recommended transactions or has not been provided important information regarding its portfolio or investment objectives.

We respectfully suggest that CESR should not recommend the imposition of mechanical rules setting forth minimum information standards, particularly in cases where the reputation of an institutional investor is established and well known. An investment firm should consider, in assessing the suitability of its recommendations, the general reputation of an institutional investor in the industry as a whole and written representations from the institutional investor.

In the case of options and highly complex financial products traded on an execution-only system, we believe an investment firm need not have any special duty to consider suitability issues with respect to trades by an institutional investor that (a) has an established reputation among industry professionals for sophistication and expertise and, possibly, (b) provides a written representation that it is knowledgeable about the securities traded on the system and is fully capable of independently evaluating the merits, nature and risks of any participation, order or trade effected on such a system.

3. <u>MANDATE</u>

3.4 Best execution/Pre-trade transparency for Regulated Markets and MTFs/Post-trade transparency for Regulated Markets, MTFs and Investment Firms.

RESPONSE

We will submit a response regarding best execution issues to CESR's comprehensive consultation on best execution contained within its first consultation on its draft advice to the European Commission on the MiFID Directive.²

4. <u>MANDATE</u>

3.5. Limit orders display (Article 22.2) — the different arrangements through which an investment firm can be deemed to have met its obligation to disclose not immediately executable client limit orders to the market in a manner which is easily accessible to other market participants.

RESPONSE

We think an investment firm should be allowed to meet its obligation to disclose client limit orders that are not immediately executable in a manner that makes such orders easily accessible to other market participants if it discloses such orders:

- (a) to a Regulated Market or Multilateral Trading Facility ("MTF"); or
- (b) on a proprietary Web site that
 - (i) is readily accessible to market participants,
- (ii) provides the ability to effect a transaction via the Web site equivalent to the ease with which a market participant or its agency broker can effect the same transaction on a Regulated Market or MTF, and
- (iii) does not charge any fee that is contrary to, that is not disclosed in the manner required by rules of the Regulated Market of which the investment firm is a member, or that is inconsistent with any standard of equivalent access established by such rules.

With respect to Member States that elect, under Article 22, to oblige investment firms to send client limit orders not immediately executable to Regulated Markets or MTFs, we recommend that investment firms be deemed to have met their Article 22 disclosure obligation if they immediately disclose unexecuted client limit orders to:

- (a) a Regulated Market or MTF of which they are a member; or
- (b) the Regulated Market or MTF that is the primary market for the security for which the limit order has been placed, provided that, in cases where an investment firm is a

² See Ref.: CESR/04-261b

member both of a Regulated Market and an MTF, the investment firm should be allowed to choose the venue to which it will disclose limit orders.

5. <u>MANDATE</u>

3.7.1 Systematic Internaliser (Articles 4 and 27) — the criteria for determining when an investment firm deals on own account on an organised, frequent and systematic basis by executing client orders outside a Regulated Market or an MTF.

RESPONSE

We recommend that an investment firm be regarded as a systematic internaliser when it deals for its own account, that is, it constitutes an order destination for executing client orders against its own inventory of securities, against orders of its other clients or by matching orders of its clients with order flow it has received from other investment firms;

- a) on an organised basis, that is, the investment firm's internalising activity rests upon the infrastructure of the investment firm, its established sales, administrative and payment procedures;
- b) on a frequent basis, that is, as a regular part of its business. Frequent should not mean internalising client orders on an occasional, "one-off" basis, nor should it mean internalising order flow every day. A standard for frequency should instead look to the overall configuration of the investment firm's business plan and strategy in responding to client order flow; and
- c) on a systematic basis, that is, on a regular basis as a part of a firm's general approach to dealing with customer order flow, whether over the telephone or through one or more electronic means. Systematic should not be limited to "automatic" as in, for example, an automated system executing retail order flow. That is, the definition of systematic internaliser should not be limited to those entities that operate on an automated basis, but should extend as well to those who make markets and deal on a regular and continuous basis as opposed to a sporadic and not routine basis. This is particularly important with respect to smaller investment banks, which may be more likely to seek strategies for conducting their business to avoid being deemed systematic internalisers or market makers.

6. MANDATE

3.7.2.1 Scope of the Rule (Article 27.1) — what is to be considered a liquid market in an individual share for the purpose of Article 27.

RESPONSE

To determine what is to be considered a liquid market in an individual share for purposes of Article 27 CESR may wish to include in its analysis the following criteria:

a) the number of shares issued and outstanding;

- b) the frequency of trades in a share in a defined period of time;
- c) the value in euros of turnover, that is, the number of shares being traded in a defined period of time multiplied by the price of the share;
 - d) the number of investment firms willing to purchase or sell the share; and
 - e) the willingness of dealers to make a market in the security.

Given these criteria, we expect CESR will need to establish as a liquidity threshold a minimum standard for being able to trade a share quickly at a price that is reasonable in terms of underlying supply and demand. That might prove a cumbersome process, but a readily calculable threshold might be the average reported daily trading volume in an individual share over some period of time, such as the preceding four trading weeks. With this test, a share could be considered to have a liquid market if its average daily trading volume met a threshold sufficiently high to avoid including shares with trading volumes too low to justify requiring pre-trade transparency but also avoiding the exclusion of shares where the trading volume is high enough to make transparency appropriate. Minimum daily trading volume might be, for example, \in 500,000. Any share that fell below that trading volume threshold would be deemed illiquid for purposes of Article 27.

7. <u>MANDATE</u>

- 3.7.2.2 The determination of the Standard Market Size/Classes of Shares (Article 27.1 and 2) provide technical advice on possible implementing measures by:
- a) Specifying the criteria for determining when a price or prices reflect prevailing market conditions.
- b) Defining the classes in which liquid shares should be grouped as well as the criteria for its revision if necessary.
- c) Defining what is to be considered an order large in scale compared to normal market size.
- d) Defining the SMS for each class of shares as well as the criteria for its revision if necessary.
- e) Defining the arrangements through which competent authorities will calculate the arithmetic average value of the orders executed in the market for each share for determining the class to which each share belongs and in particular the period for revision and the time period for determining which orders are to be included in the calculation.
- f) Determining the arrangements through which competent authorities shall make public to all market participants the class of shares to which each share belongs.

RESPONSE

With respect to item (a), in determining a prevailing market price for OTC markets, the prevailing market price generally would be the price at which dealers trade with one another. Where a single dealer dominates the market in a particular security and there is effectively no competition in quoting prices in that security, it may well be that a "prevailing" market price cannot be determined (this conundrum may, in other contexts, make more difficult an assessment of whether the dealer is treating its customers fairly or charging fair mark-ups and mark-downs). For auction markets, a prevailing market price can be determined on the basis of a range of average quotations and last-sale data within a defined trading period.

There are several ways to compute "standard market size". It may be based upon the market impact of a trade; the monthly average trading volume; or the test set forth in Article 27. Adhering to the test in Article 27, we have developed a table that provides both classes of shares and standard market size for each share. With respect to items (b) and (d), that is, defining the classes into which liquid shares should be grouped and the standard market size for each share, the attached table groups the Bloomberg 500 index, creates the standard market size for each share and, in lots of 10,000 shares, indicates how many companies would be in each class.

The attached table is based upon data in the selected shares for July 5, 2004. As the side bar to the table indicates, Standard Market Size is calculated by multiplying the Share Price of an individual security times the Volume of Shares Traded divided by the Number of Trades. For multiple days of trading, the result would then be divided by the number of trading days covered by the data. In calculating Standard Market Size, the formula in Article 27 requires "excluding those [orders] large in scale compared to normal market size". For the reasons we set forth in our response to item (c), below, we concluded that such orders are block-size orders and we excluded them as the formula requires. Our algorithm deducts block size for each share as defined by the market center on which its shares are traded. We would submit that this approach, based upon established market practices and adjusted in proportion to the relative degree of liquidity for each share, provides a better result than attempting to develop and impose a single definition of block size on the selected shares.

Finally, classes of shares are grouped into units of 10,000. In using 10,000 as the unit for a class of shares, we have kept in mind Recital 54 of MiFID, which provides "The standard market size for any class of share should not be significantly disproportionate to any share included in that class." A unit of 10,000 for classes of shares yields a number of classes of shares that is not so small that the range of average market sizes would be inappropriately large.

The Bloomberg European 500 Index is a capitalization-weighted index of the 500 most highly capitalized European companies.

With respect to item (e), the algorithm used in the attached table should facilitate calculations by the competent authorities for determining each class of shares and into which class each share belongs. We would suggest that these calculations need not be done more than twice a year and should be based on not less than 30 consecutive trading days.

With respect to item (f), we note that the class of shares to which a share belongs can be made public by the regulated market on which such share is listed by posting the information on its Web site and/or assigning a separate identifier for each share class that can be set alongside all quotations and last-sale transaction reports with respect to each share.

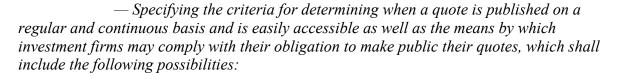
With respect to item (c), we note that Article 44, paragraph 2 of MiFID provides:

Member States shall provide that the competent authorities are to be able to waive the obligation of regulated markets to make public the information referred to in paragraph 1 based on the market model or the type and size of orders. In particular, the competent authorities shall be able to waive the obligation in respect of transactions that *are large in scale compared with normal market size for the share or type of share in question* [emphasis added].

We call your attention to Article 44 because we think it important that normal market size be interpreted consistently for both Article 44 and for Article 27. The most logical reading of normal market size consistent with both Article 27 and Article 44 is that it is larger than standard market size but smaller than block size. We believe it is reasonable to conclude, on the basis of the discussion and debate accompanying the adoption of MiFID, that a "transaction large in scale compared with normal market size" refers to a block trade. Normal market size is, at one end of the scale, less than block size. At the other end of the scale, normal market size cannot be either standard market size or less than standard market size. If normal market size were the same as standard market size, the term would be redundant and surplusage.

8. <u>MANDATE</u>

3.7.2.4 The publication of the quotes (Article 27.3) — provide technical advice on possible implementing measures by:



- a) Through the facilities of any regulated market which has admitted the instrument in question to trading;
 - *b)* Through the offices of a third party;
 - c) Through proprietary arrangements.

RESPONSE

We recommend that a quotation be deemed to be published on a regular basis when its publication is a routine part of the conduct of the investment firm's business. A quotation would be deemed to be published on a continuous basis when it is displayed without interruption from the time it is initially submitted and for each consecutive trading session thereafter until either it is canceled or hit. Taken together, a quotation would be published on a regular and continuous basis when it is available without interruption from the time it is submitted to the time it is canceled or hit.

We think a quotation should be deemed to be easily accessible when it is firm, publicly disclosed, immediately executable and not subject to an access fee Accessibility must also facilitate consolidation. Investment firms also should be required, if they do not report their quotations to a regulated market or an MTF, to provide direct linkage to a data consolidator.

Investment firms, we believe, should be permitted to comply with their obligation to make public their quotations by making bids and offers immediately available in real time through the facilities of a regulated market, through a third party or through proprietary arrangements, such as a Web site. Where an investment firm elects to meet its quotation publication obligations through a proprietary Web site, the Web site operator should be required to allow direct linkages to data consolidators to ensure that all data provided on the Web site are simultaneously available to the consolidators for consolidation and wider distribution among investors. Otherwise, investors seeking to tap all available sources of liquidity will have substantial problems since they may have to access multiple web sites and may be unable, as a practical matter, to do so in a timely manner, particularly in a fast-moving market.

In developing its advice concerning implementing measures for ensuring consolidation of and access to market data, we believe CESR should consider the consequences of an increase in off-exchange trading under the MiFID Directive. Currently, the majority of investors in Europe rely upon the regulated markets for their benchmarks, for example, VWAP. It may be, however, that the best bid and/or the best offer will not be on regulated markets as concentration rules are removed and off-exchange trading grows and as investment banks are no longer obliged to print their trades on the regulated markets. As a result, measures like VWAP will no longer be authoritative benchmarks. Unless the MiFID Directive implementing measures ensure adequate consolidation of and access to market data, the result will be opaque and inefficient markets. Quotation consolidation likely will enhance competition and narrow spreads, the very results that will benefit the investing public. CESR, we believe, should bear that in mind in recommending measures to implement the ISD.

9. <u>MANDATE</u>

3.7.2.5 Withdrawal, updating and protection against multiple hits (Article 27.3 and 5) — provide technical advice on possible implementing measures on:

- Which market circumstances that could be considered as exceptional that could allow a systematic internaliser to withdraw its quotes.
 - The conditions under which quotes can be updated.
- The criteria for determining what constitutes considerably exceeding the norm in order to limit the total number of transactions from different clients.

RESPONSE

The problem of withdrawing quotations is important, particularly since Article 27 permits an investment firm to give a customer price improvement over its published price without first adjusting its published price, but not size improvement unless it first revises its published size. For example, under Article 27.3, if an investment firm offers 10,000 shares of X at a price of €25 per share and a customer wishes to buy 20,000 shares, the investment firm cannot give its customer the ability to do that trade unless it first displays a new quotation for 20,000 shares. That then exposes the firm, unless it withdraws the 20,000-share quotation immediately thereafter, to multiple executions at that new size. It may be willing to do a single, "one off" trade for 20,000 shares at a given price but not multiple trades.

We believe it important for CESR to be aware of how the proposed rule can be gamed, particularly since the rule's restrictions apply only to orders of standard market size or smaller. If, for example, the "standard market size" for the security in question were 22,000 shares, an investment firm could sell 22,000 shares to its customer at that size without adjusting its published 10,000-share quotation and then cover the excess 2,000 shares by repurchasing them from the customer in a simultaneous or near-simultaneous trade. That would not likely serve the cause of transparency.

It is in the best interests of both the markets and investors that a rule not be in place that thwarts an essential service and that is readily circumvented. We therefore recommend that in implementing the rule — if we assume it is too late to provide expressly for size improvement in the implementing regulations — CESR should advise the Commission to provide that where a dealer puts in a quotation solely to facilitate size improvement to a customer, the dealer should be able to withdraw the new quotation immediately after displaying it. That would protect dealers from unwanted executions and make it possible for customers to get size improvement.

We also would suggest that CESR consider additional excused withdrawals. In the United States, excused withdrawals are permitted to Nasdaq market makers under NASD Rule 4619. Such withdrawals may be granted for up to five business days based upon circumstances beyond a market maker's control. Excused withdrawal status also might be granted for up to 60 days based upon demonstrated legal or regulatory requirements. Other excused withdrawals might be provided for religious holidays or may be granted to a market maker that fails to maintain a clearing arrangement with a registered clearing agency or with a member of such an agency. In each case, a market maker that wishes to withdraw its

quotations in a security would contact the competent authority to obtain excused withdrawal status consistent with the implementing measures directive before withdrawing its quotations.

10. MANDATE

3.7.2.6 Transactions exempted from the quote firmness (Article 27.3) — specify the general criteria for determining those transactions where execution in several securities is part of one transaction or orders that are subject to conditions other than current market price.

RESPONSE

Basket trades are transactions where execution in several securities should be considered part of one transaction. A basket trade may be defined as a transaction that includes a group of securities, usually fifteen or more, that are sold in a single transaction typically to conduct arbitrage with respect to an option, future or other interest whose value is based upon the basket.

11. <u>MANDATE</u>

3.7.2.7 Retail size orders (Article 27.3) — provide technical advice specifying the criteria for determining what is a size customarily undertaken by a retail investor.

RESPONSE

CESR can base its determination of the size of retail orders upon the maximum size of orders accepted by retail-firm automated systems.

* * *

In closing, we wish to reiterate our support for the Lamfalussy process and the CESR's procedures for facilitating participation by interested parties in the Level 2 process. We hope our responses to CESR's Call for Evidence prove useful in its deliberations.

Respectfully submitted,

Stephen Baker by RDB

Attachment: Table of Standard Market Sizes and Share Classes

TABLE OF STANDARD MARKET SIZES AND SHARE CLASSES

(The Bloomberg European 500 Index, Represented Below, Is A Capitalization-Weighted Index Of The 500 Most Highly Capitalized European Companies.)

Company name	Share price	Volume of shares trading	Number of trades	Standard market size	Standard market size in Euros	Class in 10,000's
ANTENA 3 TELEVIS	43.5124	17488	585 ¹	1300.76	1,300.76	1

Classes of shares	number of stocks in the respective classes	The calculation of the standard market size is price of stock, multiplied by shares traded and then divided by the number of trades. This is calculated on
1-10	73	a single trading day, July 5, 2004.
10-20	146	
20-30	86	
30-40	48	
40-50	27	
50-60	26	
60-70	8	
70-80	11	
80-90	3	
90-100	6	
100-110	6	
110-120	11	

Company name	Share price	Volume of shares trading	Number of trades	Standard market size	Standard market size in Euros	Class in 10,000's
ABN AMRO HLDG	17.7103	3008317	2065	25800.58	25,800.58	20
ANGLO AMER PLC	1110.921	2379311	790	3345856	50,284.88	50
ABB LTD	6.7729	5698872	1202	32111.39	20,954.29	20
ABERTIS	13.7119	367430	332	15175.19	15,175.19	15
ASSOC BRIT FOODS	620.6365	1529571	402	2361462	35,490.41	30
ASSOC BR PORTS	402.0561	840934	338	1000304	15,033.56	15
ACCOR SA	34.1638	393521	806	16680.12	16,680.12	10
CREDIT AGRICOLE	19.7869	1477115	1331	21959.07	21,959.07	20
ACS ACTIVIDADES	13.8333	330567	262	17453.56	17,453.56	15
ACERINOX SA	46.2224	199469	342	26958.88	26,958.88	20
ADECCO SA-REG	62.9577	166477	420	24954.78	16,284.24	15
ADIDAS-SALOMON	98.559	90834	503	17798.23	17,798.23	15
AEM SPA	1.4856	566886	312	2699.249	2,699.25	1
AIR FRANCE	13.8473	218034	467	6465.058	6,465.06	1
AGFA GEVAERT NV	20.4802	135398	272	10194.77	10,194.77	10
AUTOGRILL SPA	11.8534	537950	549	11614.82	11,614.82	15
AEGON NV	9.9045	2930908	1537	18886.91	18,886.91	15
AGUAS BARCEL-A	14.1392	104510	78	18944.72	18,944.72	15
AHOLD NV	6.4099	2369265	1244	12208	12,208.00	10

(Continued footnote)

Company name	Share price	Volume of shares trading	Number of trades	Standard market size	Standard market size in Euros	Class in 10,000's
AIR LIQUIDE	135.9281	162159	1254	17577.32	17,577.32	15
AKZO NOBEL	29.7256	542434	924	17450.41	17,450.41	15
ALLEANZA	9.1414	5383388	3027	16257.58	16,257.58	15
ALLIANCE & LEICE	829.2624	933574	639	1211546	18,208.32	15
ALLIED IRISH BK	12.3818	590916	69	106037.7	106,037.74	100
ALLIED DOMECQ	461.3172	5006359	1076	2146394	32,258.15	30
ALMANIJ NV	49.106	33433	102	16095.7	16,095.70	15
ALPHA BANK A.E.	20.3395	136930	549	5073.02	5,073.02	1
ALTANA AG	49.3708	137478	385	17629.61	17,629.61	15
ALTADIS SA	25.7243	674418	878	19759.6	19,759.60	15
ALLIANZ AG-REG	88.4345	868796	1985	38706.07	38,706.07	30
DASSAULT AVIATIO	423.3108	74	14	2237.5	2,237.50	1
AMADEUS GLOBAL-A	5.529	2649422	922	15887.91	15,887.91	15
ACCIONA S.A.	52.0777	77851	207	19586	19,586.00	15
ANGLO IRISH BANK	12.5504	655158	48	171302	171,301.98	170
ABBEY NATL	488.0757	3469205	939	1803232	27,100.77	20
ANTOFAGASTA PLC	955.5547	115346	148	744725.8	11,192.48	10
AUTOROUTES DU SU	32.6991	115189	524	7188.123	7,188.12	1
ASML HOLDING NV	13.4553	2414044	1341	24221.99	24,221.99	20
ASSA ABLOY AB-B	95.7341	386636	243	152322	16,572.64	15
ATLAS COPCO-A	275.9903	271176	261	286750.7	31,198.48	30
ACTELION LTD	142.5504	15999	99	23037.01	15,032.80	15
ATOS ORIGIN	50.8916	66434	343	9856.946	9,856.95	1

Company name	Share price	Volume of shares trading	Number of trades	Standard market size	Standard market size in Euros	Class in 10,000's
ALLIANCE UNICHEM	663.518	974858	335	1930853	29,018.79	20
AUTOSTRADE SPA	16.5237	1420990	866	27113.18	27,113.18	20
AVIVA PLC	569.6185	5617688	1567	2042080	30,690.42	30
AVENTIS SA	62.3396	670964	657	63664.58	63,664.58	60
AMVESCAP PLC	366.9088	1546618	444	1278081	19,208.27	15
ASTRAZENECA PLC	2465.14	2419954	1537	3881279	58,331.74	50
BAE SYSTEMS PLC	216.0769	11981480	1068	2424083	36,431.55	30
BAA PLC	555.5104	1471462	509	1605918	24,135.35	20
BANK AUSTRIA CRE	48.6916	93056	89	50910.62	50,910.62	50
BAER HLDG	348.436	15803	219	25143.08	16,407.12	15
BALOISE HLDG-R	54.7122	221836	527	23030.62	15,028.63	15
BARCLAYS PLC	465.4219	10799390	1983	2534681	38,093.72	30
BASF AG	43.939	805048	1003	35267.2	35,267.20	30
BRIT AMER TOBACC	855.1096	3312133	1346	2104188	31,623.84	30
BAYER AG	23.3539	1179453	938	29365.49	29,365.49	20
BRIT AIRWAYS PLC	271.8608	9218668	865	2897335	43,544.04	40
BIC	36.7962	151169	80	69530.56	69,530.56	60
BRADFORD & BING	270.0787	1436723	429	904494.8	13,593.65	10
BBVA	11.0042	8717183	2030	47254	47,254.00	40
BANCO COM PORT-R	1.8593	3243145	386	15621.71	15,621.71	15
BARRATT DEV	584.236	631397	209	1764999	26,526.17	20
BEIERSDORF AG	97.6448	87728	348	24615.47	24,615.47	20
BELGACOM SA	25.0056	516814	243	53182.07	53,182.07	50

Company name	Share price	Volume of shares trading	Number of trades	Standard market size	Standard market size in Euros	Class in 10,000's
BANCO ESPIRITO-R	13.5816	18947	34	7568.546	7,568.55	1
BANCA FIDEURAM	4.5368	2561805	1023	11361.09	11,361.09	10
BG GROUP PLC	336.6906	11145090	1329	2823512	42,434.56	40
BRAMBLES IND PLC	212.9806	1479831	250	1260701	18,947.08	15
BANCA INTESA SPA	3.157	33512100	1509	70111.13	70,111.13	70
BANK IRELAND	10.5674	1240732	94	139482	139,482.04	130
BERKELEY GRP PLC	1241.715	969820	170	7083765	106,461.90	100
BANKINTER	31.0369	180313	292	19165.6	19,165.60	15
BANCA LOMBARDA	9.9786	68058	170	3994.844	3,994.84	1
BRIT LAND CO PLC	697.3924	2050487	981	1457690	21,907.63	20
BHP BILLITON PLC	481.3051	10014350	850	5670539	85,222.52	80
MONTE PASCHI SIE	2.5828	2720761	471	14919.71	14,919.71	10
BAYER MOTOREN WK	35.7631	1172017	1048	39995.19	39,995.19	30
DANONE	70.9291	529815	1277	29427.8	29,427.80	20
BNL - ORD	1.9163	21549940	2309	17884.86	17,884.86	15
BNP PARIBAS	49.466	1559781	2870	26883.67	26,883.67	20
BUNZL PLC	454.723	886201	564	714496.4	10,738.17	10
BOC GROUP PLC	922.0372	1520405	1028	1363687	20,494.85	20
BOOTS GROUP PLC	669.8061	4135452	909	3047251	45,797.13	40
BP PLC	482.2858	16101620	1947	3988486	59,942.96	50
BPB PLC	406.7427	1843054	402	1864798	28,026.05	20
BANCA POP EMILIA	31.4015	27422	2	430546	430,545.97	430
BANCO BPI SA-REG	2.9932	652987	93	21016.35	21,016.35	20

Company name	Share price	Volume of shares trading	Number of trades	Standard market size	Standard market size in Euros	Class in 10,000's
BANCA POP MILANO	5.2157	1384507	690	10465.47	10,465.47	10
BANCA POP SONDRI	8.9959	21702	2	97614.51	97,614.51	90
BPU BANCHE	13.7004	455770	497	12563.85	12,563.85	10
BANCO POPOLARE D	13.902	303930	550	7682.245	7,682.25	1
BURBERRY GROUP	408.5659	273637	131	853425.6	12,826.13	10
BHW HOLDING AG	10.9408	13388	32	4577.357	4,577.36	1
BSKYB PLC	614.8592	3688694	696	3258660	48,974.40	40
BT GROUP PLC	197.6069	17890270	1502	2353689	35,373.59	30
BANESTO SA	9.6466	259511	285	8783.855	8,783.86	1
BULGARI SPA	8.1679	778164	554	11472.86	11,472.86	10
CARREFOUR SA	38.9588	1338531	2487	20968.06	20,968.06	20
CA ILE FRANCE	112.6622	609	15	4574.085	4,574.09	1
CAP GEMINI SA	31.7028	436004	902	15324.33	15,324.33	15
CAPITALIA SPA	2.5619	8560877	1220	17977.14	17,977.14	15
CARLSBERG-B	314.591	289338	388	234595.7	31,541.39	30
COMMERZBANK	14.2584	888810	664	19085.86	19,085.86	15
CADBURY SCHWEPPE	468.0307	5641922	982	2688995	40,412.90	40
CELLTECH GROUP	548.0952	891615	43	11364881	170,802.80	170
CARNIVAL PLC	2704.59	661494	760	2354040	35,378.86	30
CHRISTIAN DIOR	52.7177	78480	263	15731.12	15,731.12	15
AREVA-CI	231.7024	4311	117	8537.342	8,537.34	1
CEPSA	27.4333	16707	50	9166.563	9,166.56	1
ALCATEL SA	12.1655	3751165	3053	14947.53	14,947.53	10

Company name	Share price	Volume of shares trading	Number of trades	Standard market size	Standard market size in Euros	Class in 10,000's
CIBA SPECIALTY-R	89.4351	77992	347	20101.51	13,117.24	10
CIMPOR-CIMENTOS	3.9802	361406	161	8934.585	8,934.58	1
CLARIANT AG-REG	18.2258	398615	272	26709.84	17,429.51	15
CELESIO AG	49.0741	46453	206	11066.21	11,066.21	10
CIMENTS FRANCAIS	63.6193	6738	54	7938.275	7,938.27	1
CENTRICA PLC	238.2548	18589890	1614	2744195	41,242.50	40
CAIRN ENERGY	1450.134	2466887	768	4657964	70,004.55	70
CNP ASSURANCES	46.5399	260719	216	56175.17	56,175.17	50
CASINO GUICHARD	72.6165	218563	686	23135.98	23,135.98	20
COBHAM PLC	1383.718	93249	95	1358214	20,412.60	20
COLOPLAST-B	581.5396	9088	50	105700.6	14,211.45	10
COLRUYT NV	100.6861	22032	200	11091.58	11,091.58	10
CONTINENTAL AG	38.4025	381413	695	21075.13	21,075.13	20
CORIO NV	34.794	156116	154	35272.08	35,272.08	30
COSMOTE MOBILE	13.1894	324680	389	11008.57	11,008.57	10
COMPASS GROUP	334.7473	5536998	876	2115862	31,799.29	30
CAPITA GROUP PLC	319.5669	2955454	538	1755512	26,383.58	20
CARPHONE WAREHOU	144.5445	513495	197	376765.9	5,662.41	1
CARREFOUR	14.9361	11475	18	9521.764	9,521.76	1
BANCA CARIGE	3.0445	74769	54	4215.449	4,215.45	1
CRH PLC	17.6787	558354	65	151861.1	151,861.12	150
AXA	17.7856	3331871	2171	27295.87	27,295.87	20

Company name	Share price	Volume of shares trading	Number of trades	Standard market size	Standard market size in Euros	Class in 10,000's
CORUS GROUP PLC	39.3233	17612650	269	2574675	38,694.79	30
CS GROUP	43.2788	1988488	1674	51409.42	33,547.22	30
CABLE & WIRELESS	123.0813	12103740	676	2203763	33,120.36	30
DANSKE BANK A/S	144.4906	1045187	211	715733.2	96,230.32	90
DEUTSCHE BOERSE	41.9294	272070	469	24323.52	24,323.52	20
DEUTSCHE BANK-R	62.9988	1612668	1787	56852.91	56,852.91	50
DANISCO AS	316.5451	180522	271	210861.1	28,350.27	20
DAIMLERCHRYSLER	36.9829	3229732	2337	51110.34	51,110.34	50
JC DECAUX S.A.	17.6288	73464	281	4608.833	4,608.83	1
DELHAIZE GROUP	41.1636	110396	308	14754.21	14,754.21	10
DEPFA BANK PLC	11.9834	649903	336	23178.71	23,178.71	20
DEXIA	13.4267	470817	460	13742.43	13,742.43	10
VINCI S.A.	83.652	274995	1158	19865.18	19,865.18	15
DIAGEO PLC	725.6949	7451197	1492	3624193	54,467.99	50
DEGUSSA AG	27.2112	13118	52	6864.548	6,864.55	1
DAILY MAIL TST A	714.661	425605	285	1067240	16,039.54	15
DNB NOR ASA	47.7761	4002412	432	442638	52,187.03	50
DEUTSCHE POST-RG	17.6046	1552738	1132	24147.82	24,147.82	20
DSM NV	39.9998	139538	399	13988.7	13,988.70	10
DASSAULT SYSTEME	37.6285	436843	483	34032.6	34,032.60	30
DEUTSCHE TELEKOM	14.3508	6309503	2371	38189.13	38,189.13	30
DIXONS GROUP	162.8097	7800887	481	2640458	39,683.44	30
EADS NV	22.0738	1014976	1601	13993.99	13,993.99	10

Company name	Share price	Volume of shares trading	Number of trades	Standard market size	Standard market size in Euros	Class in 10,000's
E.BISCOM	43.3899	239433	1763	5892.782	5,892.78	1
ERSTE BANK DER O	33.3804	121820	137	29681.75	29,681.75	20
ELECTROCOMPONENT	350.2989	1469558	549	937676.8	14,092.34	10
EDISON SPA	1.424	1461312	306	6800.354	6,800.35	1
EDP SA	2.2736	7775053	503	35143.86	35,143.86	30
COCA-COLA SA	19.3314	133835	158	16374.8	16,374.80	15
ESSILOR INTL	53.6702	161017	653	13234.02	13,234.02	10
EGG PLC	157.9362	113797	26	691256.4	10,388.89	10
ENDESA SA	15.3895	4890008	1831	41100.37	41,100.37	40
ELECTRABEL SA	265.5073	24801	364	18090.24	18,090.24	15
ELAN CORP PLC	20.699	257184	43	123801.2	123,801.20	120
HELLENIC PETRO	6.8452	43660	146	2046.996	2,047.00	1
ELECTROLUX AB-B	141.8748	896052	380	334545.3	36,398.52	30
EMAP PLC	728.2147	2152988	605	2591467	38,947.16	30
MAN GROUP PLC	1436.437	2142853	897	3431520	51,572.31	50
EMI GROUP PLC	239.6682	3327384	727	1096930	16,485.76	15
BOUYGUES	27.2858	575314	1063	14767.55	14,767.55	10
ENEL SPA	6.5843	8833262	3443	16892.49	16,892.49	15
ENAGAS	9.0076	642166	481	12025.73	12,025.73	10
ENI SPA	16.5039	9410896	3884	39988.8	39,988.80	30
E.ON AG	59.3727	1128596	1452	46148.62	46,148.62	40
ERICSSON LM-B	21.815	36844660	2584	311055.1	33,842.79	30
GRUPPO EDITORIAL	4.8682	270275	230	5720.664	5,720.66	1

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NATL BANK GREECE	17.4097	105920	597	3088.837	3,088.84	1
ENTERPRISE INNS	576.6248	2142014	459	2690933	40,442.04	40
EFG EUROBANK ERG	17.4022	90850	206	7674.708	7,674.71	1
VIVENDI UNIVERSA	22.6231	2964434	2318	28932.13	28,932.13	20
EXEL PLC	757.0432	3009576	537	4242792	63,764.91	60
FIAT SPA	6.6569	4841976	2059	15654.47	15,654.47	15
FCC FOM CONST	30.0721	136862	253	16267.7	16,267.70	15
FERROVIAL	34.3332	379460	288	45236.38	45,236.38	40
CREDIT FONC FRAN	37.0431	1325	16	3067.632	3,067.63	1
EIFFAGE	66.3114	86795	281	20482.2	20,482.20	20
FINMECCANICA	0.6345	16450180	1469	7105.268	7,105.27	1
FORTIS	17.9006	405974	389	18681.69	18,681.69	15
TOTAL SA	158.1151	895195	2494	56753.75	56,753.75	50
FRIENDS PRO PLC	139.8895	8030368	487	2306703	34,667.43	30
VALEO	32.8105	302704	860	11548.69	11,548.69	1
FRAPORT AG	23.7393	48874	118	9832.496	9,832.50	1
FRESENIUS AG	68.1644	3961	22	12272.69	12,272.69	10
FONDIARIA-SAI	18.1275	120033	392	5550.761	5,550.76	1
FORENINGSSPARBAN	143.1082	426871	221	276419.6	30,074.46	30
FRANCE TELECOM	21.1217	3726644	3047	25832.97	25,832.97	20
FORTUM OYJ	10.5021	743705	334	23384.62	23,384.62	20
GENERALI ASSIC	21.7982	4166254	2997	30302.58	30,302.58	30
GAMESA CORP TECN	12.0177	835744	461	21786.81	21,786.81	20

Company name	Share price	Volume of shares trading	Number of trades	Standard market size	Standard market size in Euros	Class in 10,000's
GAMBRO AB-A SHS	75.9118	309228	193	121627.2	13,233.04	10
GAS NATURAL SDG	19.3649	383042	390	19019.41	19,019.41	15
GROUPE BRUX LAMB	52.4813	23884	119	10533.31	10,533.31	10
GEBERIT AG-REG	841.0748	4600	185	20913.21	13,646.92	10
GETINGE AB-B SHS	86.028	1188249	959	106593	11,597.32	10
GECINA SA	64.4217	182689	112	105081.6	105,081.57	100
GIVAUDAN-REG	740.2803	47725	840	42059.38	27,445.85	20
GKN PLC	240.44	5007482	670	1797013	27,007.31	20
GALERIES LAFAY	158.9142	3700	94	6255.133	6,255.13	1
SOC GENERALE	69.1846	808013	2149	26013.06	26,013.06	20
GALLAHER GROUP	657.8583	3057125	1094	1838350	27,628.56	20
GLAXOSMITHKLINE	1111.134	9069324	1759	5728956	86,100.49	80
GUS PLC	834.2502	3186141	1000	2658039	39,947.66	30
HAYS PLC	124.2144	14937980	760	2441463	36,692.75	30
HBOS PLC	674.3612	11691850	1926	4093733	61,524.72	60
HEIDELBERG DRUCK	26.9471	65846	171	10376.37	10,376.37	10
HEINEKEN HLDG -A	24.06	75145	159	11371	11,371.00	10
HEIDEL CEMENT	38.4114	95643	174	21113.69	21,113.69	20
HENKEL KGAA	63.4494	14294	33	27483.2	27,483.20	20
HILTON GROUP PLC	269.1621	6001090	632	2555801	38,411.13	30
HHG PLC	47.532	984483	40	1169861	17,581.84	15
HENNES & MAURI-B	196.6611	3245342	659	968486.4	105,371.32	100
HAMMERSON PLC	697.9126	787366	214	2567816	38,591.71	30

Company name	Share price	Volume of shares trading	Number of trades	Standard market size	Standard market size in Euros	Class in 10,000's
HANNOVER RUE-REG	27.4959	277114	357	21343.13	21,343.13	20
HANSON PLC	377.4849	3261733	602	2045274	30,738.42	30
THALES SA	29.8944	355267	1176	9031.032	9,031.03	1
HOLMEN AB-B SHS	217.0646	95352	156	132676.6	14,435.21	10
HOLCIM LTD-REG	66.9984	184856	459	26982.69	17,607.56	15
HYPO REAL ESTATE	24.3072	89113	171	12667.18	12,667.18	10
HSBC HLDGS PLC	810.7452	16200160	1760	7462615	112,155.64	110
HELLENIC TELECOM	10.6063	243120	466	5533.484	5,533.48	1
HYPOVEREINSBANK	13.9704	1450178	768	26379.64	26,379.64	20
ICAP PLC	263.8607	6960071	238	7716341	115,968.89	115
IBERDROLA SA	16.9908	1576595	964	27787.98	27,787.98	20
IBERIA LINEA AER	2.3667	3775794	548	16306.88	16,306.88	15
IMPERIAL CH INDS	224.738	2930148	696	946143.1	14,219.58	10
IFIL SPA	2.8775	366428	219	4814.596	4,814.60	1
INFINEON TECH	10.6417	3861689	1428	28777.97	28,777.97	20
INTERCONTINENTAL	570.3589	3615297	624	3304514	49,663.54	40
3I GROUP PLC	602.4943	1319862	508	1565373	23,525.99	20
IMI PLC	366.1709	749117	191	1436151	21,583.91	20
IMPERIAL TOBACCO	1197.575	1621525	641	3029482	45,530.08	40
INCHCAPE PLC	1711.33	61788	113	935749.2	14,063.37	10
INDUSTRIVARDEN-A	135.7572	27527	45	83044.19	9,035.21	1
ING GROEP NV-CVA	19.0783	3213400	2628	23328.09	23,328.09	20
INTERBREW SA	26.1285	326014	805	10581.69	10,581.69	1

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INVESTOR AB-B	76.9355	997567	173	443631.9	48,267.15	40
IRISH LIFE & PER	12.3496	1230444	105	144719	144,718.96	140
INTL POWER PLC	134.1266	11147500	1018	1468739	22,073.68	20
ITALCEMENTI	10.7448	526749	371	15255.56	15,255.56	10
ITV PLC	113.7806	33459780	743	5123922	77,007.42	70
INDITEX	19.2285	619579	540	22062.18	22,062.18	20
JOHNSON MATTHEY	926.3173	1225356	608	1866889	28,057.47	20
JOHNSTON PRESS	551.4342	141413	86	906743.8	13,627.45	10
KARSTADTQUELLE	17.3928	481671	480	17453.35	17,453.35	15
KBC BANCASSURANC	46.8309	121055	234	24226.99	24,226.99	20
KELDA GROUP PLC	501.6491	2211173	631	1757897	26,419.43	20
KESA ELECTRICALS	288.8146	938991	240	1129976	16,982.41	15
KINGFISHER PLC	286.4094	5690085	791	2060296	30,964.18	30
NATEXIS BANQUES	91.851	2719	81	3083.245	3,083.25	1
KUEHNE & NAGEL-R	177.1646	4505	30	26604.22	17,360.58	15
KONE OYJ-B	49.3754	35169	167	10398.1	10,398.10	10
KPN (KONIN) NV	6.2546	4482211	1187	23617.89	23,617.89	20
KERRY GROUP-A	17.3081	274908	20	237906.8	237,906.76	230
LAND SECURITIES	1150.029	1208602	857	1621852	24,374.82	10
LAFARGE SA	71.4803	462488	1244	26574.58	26,574.58	10
LEGAL & GEN GRP	98.1576	52501870	1308	3939952	59,213.54	50
DEUTSCHE LUFT-RG	10.987	1361231	657	22763.84	22,763.84	10
KLEPIERRE	55.1216	19956	104	10576.99	10,576.99	10

Company name	Share price	Volume of shares trading	Number of trades	Standard market size	Standard market size in Euros	Class in 10,000's
LIBERTY INTL PLC	766.8532	484110	364	1019894	15,327.98	10
LINDE AG	44.5295	226639	410	24614.93	24,614.93	20
LINDT & SPRUE-PC	1316.099	1607	63	33570.97	21,906.74	20
LLOYDS TSB GROUP	415.4578	19748670	2340	3506299	52,696.16	50
LONMIN PLC	991.6242	482483	194	2466195	37,064.44	30
LOGICACMG PLC	175.4813	3774217	561	1180578	17,742.91	15
LONZA GROUP AG-R	62.2839	87393	284	19166.12	12,506.85	10
ARCELOR	12.9404	5620564	2925	24865.76	24,865.76	20
H LUNDBECK A/S	133.2081	263902	210	167399.4	22,506.86	20
LUXOTTICA GROUP	14.1252	265874	440	8535.281	8,535.28	1
MITCHELLS & BUTL	277.5574	1107895	216	1423632	21,395.76	20
A P MOLLER - MAE	42103.31	4822	511	397303.6	53,417.47	50
MAN AG	29.6419	376808	472	23663.78	23,663.78	20
MAPFRE	10.1018	160571	191	8492.44	8,492.44	1
MEDIOBANCA	9.8536	1000841	716	13773.59	13,773.59	10
LVMH MOET HENNES	58.6321	454294	1063	25057.58	25,057.58	20
MEDIOLANUM SPA	5.1996	2931444	1193	12776.48	12,776.48	10
METRO AG	37.918	555377	708	29744.05	29,744.05	20
WENDEL INVESTISS	38.7449	36547	153	9254.966	9,254.97	1
MG TECHNOLOGIES	10.357	261876	179	15152.23	15,152.23	10
MARKS & SPENCER	359.6956	11992160	1132	3810536	57,268.55	50
MICHELIN-B	44.2355	262707	741	15682.83	15,682.83	10
LAGARDERE SCA	50.9067	402868	823	24919.42	24,919.42	20

Company name	Share price	Volume of shares trading	Number of trades	Standard market size	Standard market size in Euros	Class in 10,000's
M6-METROPOLE TEL	22.9968	88005	203	9969.623	9,969.62	1
MONDADORI (ARN)	7.7927	216722	333	5071.62	5,071.62	1
MOBISTAR SA	51.8157	54469	191	14776.7	14,776.70	10
MARCONI CORP PLC	683.3085	483050	251	1315029	19,763.56	15
MERCK KGAA	47.8349	88984	253	16824.27	16,824.27	15
MORRISON (WM)SUP	196.0816	46891440	3437	2675167	40,205.08	40
MEDIASET SPA	9.2671	1742937	1227	13163.79	13,163.79	10
MUENCHENER RUE-R	88.0063	409115	1149	31335.68	31,335.68	30
METROVACESA	31.9035	205131	210	31163.79	31,163.79	30
CNP -NATL PORT	120.9084	7522	67	13574.22	13,574.22	10
NORDEA BANK AB	54.2484	3934110	400	533547.9	58,050.02	50
NESTLE SA-R	332.8167	519431	1145	150982.8	98,523.83	90
NATIONAL GRID TR	425.8148	7020733	1210	2470688	37,131.96	30
NORSK HYDRO ASA	450.854	875576	574	687729.9	81,083.35	80
IMERYS SA	46.6603	62039	342	8464.206	8,464.21	1
NOBEL BIOCARE HO	188.8069	43751	335	24658.18	16,090.70	15
NOKIA OYJ	11.7818	9191673	2796	38731.92	38,731.92	30
NOVARTIS-REG SHS	54.8961	2963023	1630	99790.43	65,118.25	60
NOVO NORDISK-B	328.3593	807690	793	334442	44,965.73	40
NORTHERN ROCK	703.3772	1996460	585	2400452	36,076.39	30
NORSKE SKOG	122.4135	194072	217	109479.4	12,907.62	10
BANCA ANTONVENET	16.6232	255535	522	8137.566	8,137.57	1
NUMICO NV	26.0542	391088	493	20668.33	20,668.33	20

Company name	Share price	Volume of shares trading	Number of trades	Standard market size	Standard market size in Euros	Class in 10,000's
EURONEXT	22.8522	170260	267	14572.34	14,572.34	10
NEXT PLC	1411.799	481795	459	1481912	22,271.66	20
NOVOZYMES-B SHS	283.3116	84312	180	132703.2	17,841.94	10
OEST ELEKTRIZ-A	145.9762	427	9	6925.76	6,925.76	1
OLD MUTUAL PLC	102.4963	4794287	511	961637.3	14,452.45	10
OMV AG	162.1218	20200	43	76159.54	76,159.54	70
MMO2 PLC	93.0791	22672610	757	2787776	41,897.48	40
OPAP SA	15.936	390540	403	15443.29	15,443.29	15
L'OREAL	64.7871	452234	1514	19352	19,352.00	15
ORKLA ASA	174.2203	761687	159	834599.6	98,399.29	90
OUTOKUMPU OYJ	12.8551	180315	136	17043.88	17,043.88	15
PARGESA-B	3304.004	1150	26	146138.6	95,362.77	90
PIRELLI & C.	0.8663	6228560	697	7741.466	7,741.47	1
PEEL HLDGS PLC	1222	60	1	73320	1,101.93	1
PROVIDENT FIN	598.4725	858115	413	1243482	18,688.30	15
SEAT PAGINE	0.3437	33875970	1446	8051.985	8,051.99	1
PHILIPS ELECTRON	21.612	3424911	2602	28447.03	28,447.03	20
BANCA POP LODI	7.9972	320714	620	4136.797	4,136.80	1
PENINS & ORIENT	228.8736	1371365	284	1105173	16,609.65	15
BANCO POPULAR	45.9257	380648	709	24656.59	24,656.59	20
PINAULT-PRINTEMP	83.6852	356485	915	32603.85	32,603.85	30
PRISA	14.4251	343168	347	14265.8	14,265.80	10
PRUDENTIAL PLC	464.9131	6269957	918	3175365	47,722.56	40

Company name	Share price	Volume of shares trading	Number of trades	Standard market size	Standard market size in Euros	Class in 10,000's
PERSIMMON	628.3278	536297	531	634595.7	9,537.34	1
PEARSON PLC	654.2612	890656	433	1345778	20,225.69	20
PORTUGAL TEL-REG	8.5963	1540768	711	18628.56	18,628.56	15
PT MULTIMEDIA	17.2882	102998	181	9837.845	9,837.85	1
PUBLICIS GROUPE	23.7302	485718	889	12965.34	12,965.34	10
PUNCH TAVERNS	505.0201	1089479	178	3091061	46,455.55	40
PUMA AG	206.2084	96782	643	31037.73	31,037.73	30
RAS SPA	14.6397	1250845	1214	15084.02	15,084.02	10
RECKITT BENCKISE	1539.396	1520370	810	2889446	43,425.49	40
ROYAL BK SCOTLAN	1578.368	6103088	1862	5173426	77,751.42	70
RODAMCO EUROPE	49.4644	20896	98	10547.02	10,547.02	1
RCS MEDIAGROUP	3.4752	2294991	712	11201.62	11,201.62	10
ROYAL DUTCH PETR	42.0663	3120892	3273	40111.33	40,111.33	40
COLAS SA	94.9802	773	9	8157.744	8,157.74	1
RED ELECTRICA	13.6575	196342	223	12024.85	12,024.85	10
REED ELSEVIER PL	518.5575	3256948	905	1866204	28,047.18	20
REED ELSEVIER	11.2385	1783161	1048	19122.19	19,122.19	15
REPSOL YPF SA	17.9503	3347246	1432	41958.15	41,958.15	40
REXAM PLC	441.405	770701	284	1197857	18,002.59	15
EURAZEO	53.1805	12112	231	2788.408	2,788.41	1
PERNOD-RICARD	105.7589	161481	709	24087.52	24,087.52	20
RIO TINTO PLC	1321.845	2599650	732	4694446	70,552.83	70
RMC GROUP PLC	609.2278	1655726	606	1664545	25,016.45	20

Company name	Share price	Volume of shares trading	Number of trades	Standard market size	Standard market size in Euros	Class in 10,000's
HERMES INTL	163.2365	8493	184	7534.606	7,534.61	1
RANK GROUP PLC	298.1392	4520961	375	3594335	54,019.26	50
RENAULT SA	61.7003	502987	1079	28762.23	28,762.23	20
ROCHE HLDG-GENUS	127.3379	1166166	1216	122119.3	79,688.98	70
ROLLS-ROYCE GROU	244.3099	3989761	831	1172970	17,628.57	15
ROYAL & SUN ALLI	81.0458	10325200	450	1859587	27,947.73	20
RANDSTAD HOLDING	22.1448	45978	88	11570.15	11,570.15	10
RETI BANCARIE HO	39.598	16623	123	5351.525	5,351.52	1
RENTOKIL INITIAL	142.5129	7307168	670	1554277	23,359.23	20
REUTERS GRP PLC	353.2862	8464000	740	4040830	60,729.64	60
SWISS RE-R	79.6992	785454	1577	39695.66	25,903.40	20
RWE AG	39.2331	1505894	1864	31695.76	31,695.76	30
REXEL SA	35.0323	53506	359	5221.276	5,221.28	1
RYANAIR HLDGS	4.7832	2570188	59	208368.2	208,368.19	200
SABMILLER PLC	699.364	3493708	782	3124519	46,958.39	40
BANCO DE SABADEL	17.4806	368651	321	20075.52	20,075.52	20
SAGEM SA	89.1384	21372	359	5306.59	5,306.59	1
SAMPO OYJ-A SHS	7.9511	909894	286	25296.01	25,296.01	20
SANOFI-SYNTHELAB	52.1128	961282	1113	45009.07	45,009.07	40
SANTANDER	8.5784	10256800	2540	34640.52	34,640.52	30
SANDVIK AB	257.1043	677471	363	479836.7	52,206.23	50
SAP AG	135.4299	365669	1214	40792.85	40,792.85	40
SAINSBURY PLC	273.4289	33296090	2513	3622807	54,447.16	50

Company name	Share price	Volume of shares trading	Number of trades	Standard market size	Standard market size in Euros	Class in 10,000's
SVENSKA CELL-B	284.9836	183209	284	183843.5	20,002.18	20
SCHERING AG	48.749	723171	975	36157.81	36,157.81	30
SCHINDLER HLDG-R	387.0596	1342	13	39956.46	26,073.59	20
SWISSCOM AG-REG	409.3922	60405	506	48872.21	31,891.56	30
SCOTTISH & NEWCA	421.417	2391381	652	1545657	23,229.68	20
SCANIA AB-B	251.5198	868981	301	726132.6	79,003.23	70
SKANDIA FORSAKRI	31.7664	3644200	544	212799.8	23,152.62	20
SCHRODERS PLC	605.5079	723565	332	1319652	19,833.04	15
SEB AB-A	108.6964	1183088	346	371668.8	40,437.57	40
SECURITAS AB-B	92.3634	751728	285	243621.6	26,506.03	20
SERONO SA B	783.456	15961	295	42388.95	27,660.91	20
SOGECABLE	32.5198	185183	198	30414.72	30,414.72	30
SAGE GROUP	181.8586	7294764	283	4687688	70,451.26	70
ST GOBAIN	40.2019	748799	1180	25511.14	25,511.14	20
SGS SA	674.0577	14633	309	31920.67	20,829.83	20
SVENSKA HAN-A	149.6671	483731	258	280614.8	30,530.89	30
SHELL TRANSP-REG	401.945	12684030	1745	2921652	43,909.51	40
SHIRE PHARM PLC	484.7619	1447490	377	1861241	27,972.60	20
SIEMENS AG-REG	57.7602	2275505	2406	54627.44	54,627.44	50
SIGNET GROUP	114.6751	3918085	292	1538722	23,125.45	20
SKANSKA AB-B	65.6476	5119668	248	1355217	147,447.65	140
SKF AB-B	273.4951	216126	241	245267.2	26,685.07	20
SWISS LIFE HOLDI	169.1992	59270	466	21520.25	14,043.04	10

Company name	Share price	Volume of shares trading	Number of trades	Standard market size	Standard market size in Euros	Class in 10,000's
SLOUGH ESTAT PLC	446.1473	1175016	312	1680225	25,252.10	20
SMITHS GRP PLC	722.3572	1442961	644	1618530	24,324.89	20
SMITH & NEPHEW	597.1586	1344738	549	1462699	21,982.91	20
SOLVAY SA-A	67.9659	48352	259	12688.37	12,688.37	10
SANPAOLO IMI SPA	9.7894	4431458	2047	21192.63	21,192.63	20
SAIPEM	7.5434	1501160	802	14119.51	14,119.51	10
SCOTTISH POWER	391.1185	4687567	915	2003709	30,113.75	30
SNAM RETE GAS	3.5355	2060987	411	17729	17,729.00	15
SCOTTISH & SOUTH	677.4021	2911167	725	2720042	40,879.52	40
STANDARD CHARTER	881.2823	1130589	493	2021031	30,374.07	30
STORA ENSO OYJ-R	99.9914	77399	123	62920.6	6,845.76	1
STORA ENSO OYJ-R	10.8877	1042837	404	28104.2	28,104.20	20
STATOIL ASA	87.5566	1834791	271	592797.3	69,890.80	60
STMICROELECTRONI	17.539	1659613	1103	26389.8	26,389.80	20
STRAUMANN HLDG-R	245.406	27667	262	25914.69	16,910.63	15
SCHNEIDER ELECTR	55.1405	271695	705	21250.21	21,250.21	20
SEVERN TRENT	795.5184	3120507	1208	2054984	30,884.36	30
SODEXHO ALLIANCE	21.4245	277341	587	10122.47	10,122.47	10
SWEDISH MATCH AB	76.9458	881050	170	398782.9	43,387.58	40
SANOMAWSOY-B	15.1209	13750	33	6300.375	6,300.38	1
SYNGENTA AG	103.2314	231622	668	35794.41	23,357.64	20
SYNTHES INC	144.9099	22983	235	14172.19	9,248.06	1
SACYR VALLEHERM	11.4768	250916	249	11565.11	11,565.11	10

Company name	Share price	Volume of shares trading	Number of trades	Standard market size	Standard market size in Euros	Class in 10,000's
SUEZ SA	16.8835	2643818	2711	16465.11	16,465.11	15
SUEDZUCKER AG	16.1584	76639	130	9525.874	9,525.87	1
TATE & LYLE	330.4693	3167194	549	1906485	28,652.57	20
TDC A/S	202.003	650180	665	197501.2	26,554.04	20
TECHNIP	111.2934	47683	288	18426.4	18,426.40	15
TELEFONICA SA	12.1573	14220690	2787	62032.72	62,032.72	60
TELENOR ASA	47.8648	4617131	463	477317.6	56,275.75	50
TELE2 AB-B SHS	323.2086	692052	852	262531.9	28,563.47	20
TELEFONICA MOVIL	8.6163	382356	561	5872.538	5,872.54	1
EMPORIKI BK GR	21.0408	70020	230	6405.551	6,405.55	1
TF1-TV FRANCAISE	25.4075	506622	832	15471.15	15,471.15	10
TIETOENATOR OYJ	23.7369	168296	181	22070.86	22,070.86	20
TIM SPA	4.639	14602940	1701	39825.42	39,825.42	30
TELECOM ITALIA S	2.5546	29977140	1834	41755.51	41,755.51	40
TELEKOM AUSTRIA	12.8159	562396	171	42149.77	42,149.77	40
THYSSENKRUPP AG	13.9745	1226980	747	22953.72	22,953.72	20
TELIASONERA AB	32.4354	11025960	1205	296789.6	32,290.70	30
THOMSON (EX-TMM)	15.6239	900661	1124	12519.43	12,519.43	10
TRINITY MIRROR	647.827	351716	63	3616684	54,355.15	50
T-ONLINE INTL AG	9.5724	1161416	922	12058.07	12,058.07	10
TOMKINS PLC	271.193	6186131	688	2438424	36,647.07	30
PIRAEUS BANK	9.2721	63825	217	2727.151	2,727.15	1
TPG NV	18.3231	520535	458	20824.92	20,824.92	20

Company name	Share price	Volume of shares trading	Number of trades	Standard market size	Standard market size in Euros	Class in 10,000's
TPI TELEF	5.4605	1172490	372	17210.7	17,210.70	15
TRAVIS PERKINS	1349.047	1294774	291	6002443	90,210.72	90
TERRA NETWORKS	4.8459	96265	195	2392.259	2,392.26	1
TESCO PLC	260.597	39357040	2143	4785967	71,928.29	70
TUI AG	15.2964	788890	584	20662.97	20,662.97	20
TAYLOR WOODROW	254.4411	1157264	238	1237208	18,594.00	15
UNITED BUSINESS	494.7003	3105299	469	3275463	49,226.94	40
UBS AG-REG	87.747	1360121	1716	69549.26	45,384.37	40
UNICREDITO ITALI	4.0666	21456460	1490	58560.3	58,560.30	50
UCB SA	38.3652	189080	181	40077.86	40,077.86	40
PEUGEOT SA	44.674	454803	1119	18157.17	18,157.17	15
SWATCH GROUP-B	163.5147	153881	720	34946.95	22,804.63	20
UNIBAIL	85.0521	153595	293	44585.59	44,585.59	40
UNILEVER PLC	523.0941	6529059	1035	3299819	49,592.97	40
UNILEVER NV-CVA	54.6144	2326541	2447	51925.89	51,925.89	50
UNION FENOSA	17.4557	628494	328	33447.57	33,447.57	30
UNIPOL SPA	3.1458	174606	130	4225.197	4,225.20	1
UPM-KYMMENE OYJ	15.4586	396722	281	21824.79	21,824.79	20
UNITED UTILITIES	510.4796	4029583	768	2678411	40,253.84	40
BOLLORE	255.1846	1308	7	47683.07	47,683.07	40
VEDIOR NV-CVA	11.755	213819	301	8350.307	8,350.31	1
VEOLIA ENVIRONNE	23.0032	332221	605	12631.65	12,631.65	10
VNU NV	23.7615	430484	762	13423.81	13,423.81	10

Company name	Share price	Volume of shares trading	Number of trades	Standard market size	Standard market size in Euros	Class in 10,000's
VODAFONE GROUP	119.7651	143415400	2561	6706818	100,796.76	100
VOLVO AB-B	250.1217	1801053	1027	438639.2	47,723.94	40
WORMS & CIE	20.5193	7138	30	4882.225	4,882.23	1
VOLKSWAGEN AG	33.5848	859239	1235	23366.29	23,366.29	20
VESTAS WIND SYST	90.3606	232415	215	97679.81	13,133.05	10
WARNER CHILCOTT	657.2957	1344245	172	5137014	77,204.19	70
WILLIAM DEMANT	233.933	86777	93	218279.6	29,347.69	20
WIENERBERGER AG	28.9398	102875	105	28354.11	28,354.11	20
WOLTERS KLUWER-C	14.9999	654040	720	13625.74	13,625.74	10
WILLIAM HILL	547.9141	1410645	462	1672970	25,143.07	20
WIMPEY (G) PLC	371.7063	1514099	535	1051963	15,809.95	15
WOLSELEY PLC	843.5	1680881	545	2601510	39,098.10	30
WPP GROUP PLC	554.0897	2920107	639	2532083	38,054.68	30
WHITBREAD PLC	832.3656	886453	678	1088279	16,355.74	15
XSTRATA PLC	726.123	1575312	328	3487409	52,412.28	50
YARA INTL ASA	54.6795	434943	151	157499.8	18,569.22	15
YELL GROUP PLC	339.8095	3852703	507	2582219	38,808.17	30
ZARDOYA OTIS	15.9144	125198	256	7783.012	7,783.01	1
ZURICH FINL SVCS	195.4453	141887	784	35371.36	23,081.58	20