

**ANNUAL REPORT ON THE QUALITY OF EXECUTION FOR FISCAL YEAR 2023**

**ISSUED BY:**

**“ROTHSCHILD CO WEALTH MANAGEMENT SPAIN, A.V., S.A.”**

**In Madrid, on 2<sup>nd</sup> April 2024**

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## 1. Preliminary consideration

This report is issued by “**ROTHSCHILD CO WEALTH MANAGEMENT SPAIN, A.V., S.A.**” (the “**AV**” or the “**Company**”) in compliance with the provisions of Directive 2014/65/EU (MiFID II) together with the Commission Delegated Regulation (EU) 2017/576 of 8 June 2016 and the Regulatory Technical Standard 28 of the European Securities and Markets Authority (ESMA), which establishes the obligation, on the part of firms providing investment services, to publish annually information regarding how and where their clients' orders have been executed in order to allow the public and investors in general to assess the quality of their execution practices.

“Best execution” is the obligation of entities operating in the financial markets to ensure the best possible result for the client when brokering and executing trades. The principle of best execution does not mean that Rothschild & Co must always obtain the best price for the client, but rather reasonably good execution in view of the alternatives.

## 2. Information on the five main intermediaries to which securities orders have been transmitted for execution.

In accordance with its program of activities and the contents of its “*Best Execution and Order Management Policy*”, the AV does not directly access the financial markets for the execution of orders as it is not a member of any market, but transmits all orders to the trading desk of "ROTHSCHILD & CO BANK AG" for execution. The selection of trading venues is ultimately made by the broker within the framework of its best execution policy.

In line with the above, the trading volume and number of orders transmitted during 2023 are detailed below:

### INSTRUMENT CATEGORY Equity

INDICATE WHETHER, ON AVERAGE, LESS THAN 1 ORDER PER DAY WAS EXECUTED IN THE PREVIOUS YEAR	No				
TOP FIVE EXECUTION CENTERS BY TRADING VOLUME (IN DESCENDING ORDER)	SHARE OF VOLUME TRADED IN THE TOTAL OF THIS CATEGORY (%)	PROPORTION OF ORDERS EXECUTED IN THE TOTAL OF THIS CATEGORY (%)	PERCENTAGE OF PASSIVE ORDERS (%)	PERCENTAGE OF AGGRESSIVE ORDERS (%)	PERCENTAGE OF ORDERS DIRECTED (%)
ROTHSCHILD & CO BANK AG LEI549300ZQJQ5GQRDOBE68	100%	100%			

**INSTRUMENT CATEGORY** Fixed income

INDICATE WHETHER, ON AVERAGE, LESS THAN 1 ORDER PER DAY WAS EXECUTED IN THE PREVIOUS YEAR	No				
TOP FIVE EXECUTION CENTERS BY TRADING VOLUME (IN DESCENDING ORDER)	SHARE OF VOLUME TRADED IN THE TOTAL OF THIS CATEGORY (%)	PROPORTION OF ORDERS EXECUTED IN THE TOTAL OF THIS CATEGORY (%)	PERCENTAGE OF PASSIVE ORDERS (%)	PERCENTAGE OF AGGRESSIVE ORDERS (%)	PERCENTAGE OF ORDERS DIRECTED (%)
ROTHSCHILD & CO BANK AG LEI549300ZQJQ5GQRDOBE68	100%	100%			

**INSTRUMENT CATEGORY** Derivatives

INDICATE WHETHER, ON AVERAGE, LESS THAN 1 ORDER PER DAY WAS EXECUTED IN THE PREVIOUS YEAR	No				
TOP FIVE EXECUTION CENTERS BY TRADING VOLUME (IN DESCENDING ORDER)	SHARE OF VOLUME TRADED IN THE TOTAL OF THIS CATEGORY (%)	PROPORTION OF ORDERS EXECUTED IN THE TOTAL OF THIS CATEGORY (%)	PERCENTAGE OF PASSIVE ORDERS (%)	PERCENTAGE OF AGGRESSIVE ORDERS (%)	PERCENTAGE OF ORDERS DIRECTED (%)
ROTHSCHILD & CO BANK AG LEI549300ZQJQ5GQRDOBE68	100%	100%			

### 3. Report on the quality of execution obtained from financial intermediaries through which orders have been transmitted.

In accordance with its program of activities and the content of its "Best Execution and Order Management Policy", trading is carried out through the trading desk of "ROTHSCHILD & CO BANK AG" (hereinafter the "Intermediary").

The following is an account of the monitoring carried out by the AV on the quality of execution obtained through the Intermediary during the financial year 2023 (hereinafter, the "Reference Period").

Although physically located in Zurich, the Intermediary's trading desk uses the same central IT system as the AV in Spain (Avaloq), which is a key element of the operating model to promote the fastest and most operationally robust trading implementation. Orders are automatically transmitted to the trading desk through the TA's central IT system and then transmitted to the global network of brokers for execution. Depending on the relevant factors described below, the entire order execution can be completed within seconds. In the event that the AV had to execute trades with an external counterparty, it would most likely have to use the provider's electronic banking tools or even emails with an Excel spreadsheet which would not ensure the same level of automation, speed, control and overall efficiency for the client.

Attached in **Annex 1** is the report of ROTHSCHILD & CO BANK AG *Execution Entities by Volume and Quality of Execution Disclosures*.

### **3.1 Relative importance given to price, cost, speed, plurality of execution or any other factor, including qualitative factors, in assessing the quality of performance**

The document incorporated in **Annex 1** *Execution Entities by Volume and Quality of Execution Disclosures* sets out the top five entities through which the Intermediary executed client orders in the previous year in relation to transactions in financial instruments and information on the quality of execution obtained, as required by MiFID II.

This document is updated annually and should be read in conjunction with the MIFID II - General Information on the Intermediary's Best Execution which is attached as **Annex 2**.

When assessing the execution quality of its intermediaries, and in accordance with its Best Execution Policy, for the Equity, Fixed Income and Derivatives activities, the Intermediary takes into account several factors such as

- the price,
- costs (own and external)
- speed of execution
- probability of execution and settlement (liquidity),
- size of the order,
- nature of the order,
- type and characteristics of the financial instrument,
- characteristics of the possible execution venues,
- and any other consideration relevant to the execution of the order.

Although the total consideration (price and costs) is usually the most important factor, the value to the client of a particular transaction may be affected by other factors such as those listed above. The Intermediary may conclude that factors other than price and costs are more important in achieving the best possible result.

The relative importance of each factor may vary depending on the special objections the customer may have in connection with the execution of the order, the characteristics of the order and the characteristics of the place (if more than one) to which the order may be directed.

The Intermediary may pass an order to a third party to execute the transaction. If passed on to a third party this may be a non-affiliated party, a broker or an agent.

When the Intermediary accepts the customer's instructions with respect to the execution of an order, the Intermediary shall not execute the order.

With respect to the execution of an order, it shall follow those instructions to the extent it is possible to do so. This applies to all transactions whether the AV or another member of the Rothschild & Co group has advised.

The Intermediary would not necessarily follow its best execution rules when the AV/Intermediary follows an instruction given by the client with specific orders. This may apply, for example, when the client instructs to execute an order at a certain price certain place, or in a certain period of time.

**3.2 Description of possible close links, conflicts of interest and common shareholdings with respect to any execution venue used to execute orders.**

The Intermediary belongs to the same group as the AV. It should be noted that the AV has conflict of interest management procedures that guarantee that all operations carried out with the Intermediary and with other entities of its group are carried out under market conditions and in the exclusive interest of its clients.

**3.3 Description of any specific agreements with intermediaries regarding payments made or received, discounts, rebates or non-monetary benefits received.**

The AV does not have a closed agreement with the Intermediary related to retrocessions, discounts, reductions or non-cash benefits.

**3.4 Explanation of the factors that led to a change in the list of intermediaries included in the company's execution policy, if such a change has taken place.**

N/A.

**3.5 Explanation of how order execution differs depending on client categorization when the firm treats client categories differently and this may affect order execution modalities.**

The AV/Intermediary has not established a differentiated treatment for the execution of orders according to the client's categorization.

**3.6 Explanation of whether other criteria have been given preference over price and immediate cost criteria when executing retail client orders and an explanation of how these other criteria have been decisive in achieving the best possible result in terms of total amount for the client.**

As stipulated in point 3.1: the Intermediary takes into account several factors such as:

- the price,
- the costs (own and external)
- speed of execution
- probability of execution and settlement (liquidity),
- size of the order,
- nature of the order,
- type and characteristics of the financial instrument,
- characteristics of the possible execution places of execution,
- and any other consideration relevant for the Bank to the execution of the order.

**3.7 Explanation of how the investment firm has used any data or tools relating to execution quality, including any data published pursuant to Delegated Regulation (EU) 2017/575; and where applicable, an explanation of how the investment firm has used information sourced from a consolidated information provider established in accordance with Article 65 of Directive 2014/65/EU.**

Please refer to Annex 1 and Annex 2

#### **4. General conclusions**

During the Reference Period, the AV has taken all measures within its power to ensure that the Intermediary has complied with the best execution principles set forth in the regulations and set forth in its Best Execution and Order Management Policy.



## Top 5 Execution Entities by Volume and Quality of Execution Disclosures





## Introduction

This document sets out the top five execution entities where Rothschild & Co Bank AG ("the Bank") executed client orders in the preceding year in relation to dealings in financial instruments and information on the quality of execution obtained, as required by the Markets in Financial Instruments Directive ("MiFID II"). This document is updated on an annual basis and is to be read in conjunction with the information brochure 'MiFID II – General Information Regarding Best Execution' of the Bank.

The Bank has its registered office in Switzerland, and it is authorised and supervised by the Swiss Financial Market Supervisory Authority, FINMA. Since Switzerland is not a member of the European Union and the European Economic Area, MiFID II does not apply directly to the Bank. Nevertheless, the Bank will apply the standards that are stipulated by MiFID II.

### Execution and the Importance of Execution Factors

When assessing the quality of execution, and in accordance with its Best Execution Policy, the Bank considers several factors (unless otherwise instructed) such as

- price,
- costs (own and external),
- speed of execution,
- likelihood of execution and settlement (liquidity),
- size of the order,
- nature of the order,
- type and characteristics of the financial instrument,
- characteristics of the possible execution venues,
- and any other consideration relevant to the Bank to the execution of the order.

Whilst total consideration (price and costs) would usually be the most important factor, the overall value of the client of a particular transaction may be affected by other factors as listed above. The Bank may conclude that factors other than price and costs are more important in achieving the best possible result.

The relative importance of each factor may differ depending on any special objections the client may have in relation to the execution of the order, the characteristics of the order, and the characteristics of the venue (if there is more than one) to which the order may be directed.

The Bank may pass an order to a third party to execute the transaction. If passing to a third party, this may be a non-affiliated party, broker, or dealer.

Where the Bank accepted client instructions with respect of the execution of an order, the Bank will follow those instructions to the extent it is possible to do so. This applies

to all transactions whether the Bank or another Rothschild & Co group member had given advice. The Bank would not necessarily follow its best execution standards where the Bank would follow an instruction given by the client with specific orders. This may apply, for example, where the client instructed to execute an order at a certain price, certain venue, or over a certain time period.

### Close Links, Conflicts of Interest and Common Ownership

A conflict may arise when the Bank routes orders to an exchange based on volume discounts or fees rather than best execution. This conflict is mitigated by the required adherence to the processes and controls detailed in the internal Conflicts of Interest Policy, the Best Execution Policy and the Code of Conduct.

### Best Execution Monitoring

The Bank's Investment Control function regularly monitors the execution of its clients' orders so that the Bank can assure itself on an ongoing basis that it achieves the best possible result for its clients' orders. The results of the monitoring are reviewed on a regular basis so that the Bank can promptly instruct action in the event the Bank is not obtaining, or may not obtain, the best possible result for its clients.

### Changes to List of Approved Brokers

The Bank has selected its Approved Brokers consistent with high standards of compliance, rules of conduct, and quality performance. All Approved Brokers go through an onboarding process and the Bank reviews its list of Approved Brokers at least semi-annually to help ensure on an ongoing basis the Bank will be able to achieve the best possible result for its clients.

# Top 5 Execution Entities Trading Volumes by Asset Class

Class of Instrument	Equity - Tick size liquidity bands 1 and 2				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
UBS Switzerland AG	48.75%	13.22%	5.93%	6.82%	6.25%
Bank Berenberg	14.35%	7.06%	2.12%	4.90%	2.16%
Goldman Sachs International	13.29%	13.17%	0.74%	12.42%	5.26%
Jefferies International Ltd.	5.15%	14.01%	0.01%	14.00%	0.61%
Square Global Ltd	3.60%	20.49%	0.00%	20.49%	0.83%

Class of Instrument	Equity - Tick size liquidity bands 3 and 4				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Bank Vontobel AG	47.19%	16.47%	0.08%	16.06%	0.11%
UBS Switzerland AG	20.31%	6.31%	0.81%	5.31%	0.95%
Bank Berenberg	5.73%	9.05%	0.22%	8.80%	0.18%
Redburn Europe Ltd.	4.94%	11.08%	0.00%	11.07%	0.30%
Goldman Sachs International	4.89%	9.22%	0.16%	9.02%	1.13%

Class of Instrument	Equity - Tick size liquidity bands 5 and 6				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Goldman Sachs International	25.56%	8.57%	0.08%	8.47%	0.85%
Bank Vontobel AG	15.25%	11.25%	0.01%	10.96%	0.14%
Bank Berenberg	12.64%	10.85%	0.01%	10.80%	0.93%
UBS Switzerland AG	11.54%	8.07%	0.92%	6.90%	0.90%
Jefferies International Ltd.	9.60%	15.14%	0.00%	15.13%	1.11%

Class of Instrument	Debt Instrument - Bonds				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Jane Street Financial Limited	7.56%	11.54%	2.84%	8.33%	0.66%
Morgan Stanley & Co. Intl.	7.14%	9.18%	2.04%	6.50%	0.92%
Toronto-Dominion Bank	7.04%	3.66%	0.54%	2.83%	0.22%
Goldman Sachs International	6.96%	6.16%	1.64%	4.12%	0.35%
Citigroup Global Markets	6.85%	6.29%	1.29%	4.69%	0.65%

Class of Instrument	Debt Instrument - Money markets Instruments				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Nomura Bank International Plc.	8.79%	11.33%	1.72%	8.87%	3.20%
Morgan Stanley & Co. Intl.	6.56%	16.50%	0.25%	15.02%	2.71%
Citigroup Global Markets	6.16%	9.85%	0.00%	9.61%	1.97%
Merrill Lynch International	5.98%	11.08%	1.23%	9.85%	2.22%
Goldman Sachs International	3.46%	4.43%	0.25%	4.19%	1.23%

Class of Instrument	Exchange traded products				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Square Global Ltd	66.20%	1.92%	0.01%	1.66%	0.08%
Jane Street Financial Limited	10.34%	10.53%	0.05%	10.45%	0.85%
Flow Traders BV	5.05%	3.11%	0.01%	3.06%	0.36%
UBS Switzerland AG	3.62%	27.49%	3.29%	23.67%	4.34%
Optiver VOF	3.37%	1.76%	0.00%	1.70%	0.11%

Class of Instrument	Equity Derivatives - Options and Futures admitted to trading on a trading venue				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Credit Suisse	100.00%	100.00%	16.61%	61.21%	43.00%

Class of Instrument	Interest Rate Derivatives - Futures and options admitted to trading on a trading venue				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Credit Suisse	100.00%	100.00%	0.00%	100.00%	100.00%

Class of Instrument	Securitized Derivatives				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Leonteq Securities AG	28.33%	18.23%	0.00%	0.00%	0.00%
Bank Vontobel AG	16.90%	12.95%	0.00%	0.00%	0.00%
JPMorgan Chase Bank	6.62%	0.90%	0.00%	0.00%	0.00%
Credit Agricole SA	6.11%	0.26%	0.00%	0.00%	0.00%
Citigroup Global Markets	6.06%	2.96%	0.06%	0.00%	0.00%

Class of Instrument	Other instruments				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Allfunds Bank International S.A.	31.38%	41.54%	0.00%	0.00%	0.00%
Goldman Sachs International	18.11%	2.52%	0.00%	2.52%	0.44%
Citigroup Global Markets	17.96%	0.10%	0.00%	0.10%	0.00%
BNP Paribas SA	6.45%	0.05%	0.00%	0.00%	0.00%
Jane Street Financial Limited	4.22%	0.53%	0.00%	0.53%	0.00%



#### Cotton Samples

Seeking efficiency in his textile business, Nathan Rothschild used a cotton sample book to record clients' choices so he could place more bulk orders, achieving better prices for his clients.

Courtesy of The Rothschild Archive

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Publication date: April 2022



# Anexo 2.- MiFID II – General information on the best execution of client orders

Rothschild & Co Bank AG, Zollikerstrasse 181, 8034 Zurich (the “Bank”) has implemented approaches, procedures and execution principles aiming at achieving the best possible execution in the interest of its Clients when receiving, transmitting and/or executing orders with respect to financial instruments for the Clients (“Principles of Best Execution” or “PBE”). The PBE do, however, not entail a guarantee that best possible execution will be achieved in each individual case. As indicated in the Bank’s brochure *MiFID II – General information on the Bank and its service*, even though MiFID II does not necessarily apply to the Bank, MiFID II will still be considered as a best practice benchmark.

The Bank reserves the right to amend the PBE at any time. The Clients of the Bank will be notified of any such amendments in writing or by other suitable means. By issuing its first order, a respective Client agrees to the PBE.

The purpose of this brochure is to inform on the PBE and to provide a summary thereof. Unless specifically provided otherwise, the brochure merely has an informative character.

## 1. General remarks

### 1.1 Scope

The PBE apply to the execution, acceptance and forwarding of orders by the Bank on behalf of Clients for the purpose of buying and selling financial instruments. It also applies to orders in financial instruments that the Bank executes for its Clients. They also apply if the Bank, in fulfilling its obligations under an asset management agreement with the client, buys or sells financial instruments for account of the Client.

### 1.2 Fixed-price transactions

If the transaction is a fixed-price transaction, i.e. if a purchase agreement or sale agreement is concluded between the Client and the Bank for the delivery or acceptance of securities or other financial instruments at a fixed agreed or determinable price, then execution as defined above does not apply. In this case the Client and the Bank are obliged in accordance with their contractual arrangement to deliver the securities or other financial instruments covered by the agreement and to pay the purchase price. The Bank ensures that client orders in the context of fixed-price transactions are executed on market terms.

### 1.3 Primary market transactions

These PBE do not apply to primary market transactions.

## 1.4 Precedence of client instructions

If a client issues specific instructions to the Bank for settlement of an order, then the Bank will execute the order in accordance with those instructions. If the client’s instructions are not precise on certain points, the Bank will act in this respect in accordance with the PBE. The client’s attention is drawn to the fact that if the client issues instructions, the Bank will execute the order in accordance with the client’s instructions and to this extent the principles of best possible execution do not apply. In this case, the client’s instructions may exempt the Bank from applying its best execution principles according to the PBE.

## 1.5 Pooling of client orders

The Bank is entitled to pool client orders with its own orders or with orders of any other clients. Orders will only be pooled in case it is very unlikely that pooling will be disadvantageous to the client. Notwithstanding this, it is possible that the effect of pooling may work to the client’s disadvantage in relation to a particular order.

### Market orders

**1.6** When the client gives an instruction to complete the order at market, the order shall be executed at the next available price allowing for time to process and place the order. With a market order, the client instructs the Bank to execute a transaction of a certain size as promptly as possible at the available market price(s). The Bank may use its discretion to change the client’s order to a limit order if it can reasonably be assumed under the given market conditions that this will result in a better price. Nevertheless, it is possible that this might be disadvantageous to the client in connection with a specific order.

## 1.7 Limit orders relating to equities and equity-like instruments

If limit orders relating to equities or equity-like instruments for which trading is permitted on a regulated market are not executed immediately on account of current market conditions, the Bank is obliged to make such orders public to other market participants unless the Client instructs otherwise. This duty is regarded as having been fulfilled when such a limit order is transmitted to a regulated market or multilateral trading facility. In the absence of an explicit request from the Client to the contrary upon having received this brochure, the Bank will treat a Client, when placing an order with the Bank, as having provided the Bank with the consent not to publish any unexecuted limit orders, as the Bank believes this to be in the Client’s best interest.



## 2. Criteria for determining best possible execution

### 2.1 Basic principle

When executing client orders and when accepting and forwarding client orders for the purpose of execution, the Bank will take all appropriate measures to achieve the best possible result for its clients. In doing so, the Bank will determine the relative importance of the execution factors on the basis of its business judgement, its trading experience and the market information available to it.

### 2.2 Execution factors

The execution factors that are considered may include the following:

#### Price/costs

The Bank will choose what it regards as the best possible result on the basis of the factor of overall cost. This includes consideration of its own and external charges and costs associated with settlement. For retail clients in particular, price is accorded the highest level of importance in determining the best possible result. However, for certain Clients, orders, financial instruments or markets, the Bank may come to the conclusion that greater importance needs to be attached to other execution factors in achieving the best possible execution result.

#### Probability of execution and settlement

Greater importance is attached to the probability of execution and settlement than to the expected timing of the transaction because of the assumption that orders can as a rule be placed on the market quickly, so more attention is paid to market liquidity.

#### Execution timing

In general, orders are placed with the execution venue immediately. However, it is possible that orders will not be settled straight away owing to a lack of liquidity.

#### Size and type of order

In connection with the “probability of execution and settlement”, attention needs to be paid in particular to the size of the order. The type of order refers to the various order types. Because the different execution venues (e.g. stock exchanges) can determine order types, it may not be possible to place certain order types with the desired venue.

### 2.3 Execution venues

In the absence of client instructions to the contrary, the Bank will settle an order through one of the following execution venues or through several of them:

- execution directly through a regulated market (stock exchange), a multilateral trading facility (MTF) (or – if the Bank itself is not a direct member of the relevant regulated market or MTF – through a broker that will execute the order via this regulated market or MTF) or an Organised Trading Facility (OTF)
- execution outside a regulated market or MTF

- execution of the order in conjunction with an opposite order from another Client of the Bank
- execution via other brokers or market makers
- settlement through order-crossing networks and electronic trading platforms that do not constitute regulated markets or MTFs
- with a systematic internalizer

Having considered the execution factors, the Bank selects the execution venue that it deems to be the most suitable one to place orders with. Depending on the market and the type of financial instruments being traded, the Bank uses different execution venues. When choosing the best execution venue, the Bank will rely on the correctness of the information received by third party providers (e.g. SIX Financial Information).

The Bank maintains a selected network of global brokers and brokers with local expertise. Information on the trading venues used by the Bank is accessible on the Bank’s website.

The Bank monitors the execution venues and evaluates their quality and timely execution through the brokers on an ongoing basis.

Further, after careful consideration of the options set out above, the Bank may itself act as the execution venue and make use of an internal execution method, if this is advantageous from the point of view of the Bank or not disadvantageous to the Client.

### 2.4 Execution orders outside an execution venue

When executing orders outside a trading venue, the Bank will use all reasonable efforts to obtain competing quotes from several of its approved counterparties in order to deal on the best price. It should be noted that with less liquid instruments there might be only one liquidity provider and therefore only one available price to deal on. In volatile non-transparent markets, it may be necessary to accept the first price offered without the opportunity to obtain or request other prices.

Trades executed outside a trading venue always bear a counterparty risk. This risk may result in a loss for the Client if the counterparty is not able to fulfil its contractual obligations.

By issuing its first order, the Client gives consent for the execution of orders outside a regulated market, MTF or OTF.

## 3. Monitoring and review

The Bank reviews the PBE annually as well as whenever a material change arises that has an impact on the Bank’s ability to continue consistently achieving the best possible result when executing its client orders at the place of execution defined in these PBE. Where the Bank uses third-party brokers to execute transactions, the Bank undertakes periodic reviews of the execution quality of its third-party brokers.



The Bank reviews the selection of execution venues and brokers with reasonable frequency, but at least once a year, and adapts as appropriate. It will also carry out a review and make adjustments as necessary if there are reasons for believing that material criteria that favoured a specific execution venue have ceased to be valid. The Client permits the Bank to make such adjustments unilaterally.

The Bank will inform the Client in a suitable manner about material changes to the PBE.

#### **4. Other matters**

##### **4.1 General execution and order processing procedures**

The Bank has issued internal policies for the collection and allocation of orders, the procedure for partial executions and the handling of limit orders. The focus is on the Client's interest in best possible execution of the order. The Bank will inform its Clients promptly if difficulties arise in the processing of their orders and takes all reasonable precautions to prevent settlement errors or deficiencies.

##### **4.2 Disturbances in the market or trading system**

In the event of disturbances in the market or the Bank's own systems e.g. due to outages or deficient access in technical systems, it may be impossible or inappropriate to execute orders in the best interest of the Client as set out in the PBE. The Bank will thereupon take all reasonable measures in order to otherwise achieve the best possible result for the Client.

##### **4.3 Cancellations**

If the account is credited with an amount subject to payments actually being received, the Bank may subsequently reverse credit on the account, irrespective of the period of time that has passed since the booking was made to the account. The same also applies for custody account assets that are booked into the Client's custody account subject to the securities actually being delivered as well as for account and custody account bookings that were mistakenly or incorrectly made. The Client acknowledges that the Bank may make such correction bookings without consulting the Client in advance.

The Bank is under no obligation to execute orders for which there is no coverage/credit limit or which concern balances and custody assets that have been credited subject to payment/securities actually being received and where such a payment/securities delivery is still outstanding.

##### **4.4 Unforeseen circumstances**

Best execution is a process and not an outcome. When the Bank is executing an order for its Client, the Bank will execute it in accordance with the PBE. However, the Bank cannot guarantee that the best possible result will be obtained in all circumstances and in every event. The relative importance of the different execution factors may lead to a different result in a particular transaction.

##### **4.5 Controller**

A controller is any person who in fact, either directly or indirectly, at his own discretion, makes decisions or gives instructions with respect to transactions entered into under the PBE, either by virtue of a power of attorney or otherwise. The Client is obliged to inform the Bank who might be acting as a controller with regard to transactions concluded under the PBE. In addition, the Client undertakes to inform the Bank immediately, at the latest on the following bank working day, if such information is no longer correct and true. Without such notification, the Bank assumes that the respective transaction initiator is also the sole controller.