



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 nonaffiliated 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	33.61%	16.19%	6.86%	8.95%	6.36%
Jefferies International Ltd.	19.82%	14.83%	1.58%	13.24%	4.53%
Rothschild & Co Redburn	18.24%	11.62%	10.68%	0.91%	11.05%
Goldman Sachs International	8.68%	9.53%	1.12%	8.39%	2.43%
Bank Berenberg	5.42%	4.78%	0.02%	4.70%	2.01%

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	21.45%	31.50%	0.00%	31.39%	0.37%
Jefferies International Ltd.	17.89%	17.23%	0.00%	17.20%	0.90%
UBS Switzerland AG	17.77%	6.76%	2.20%	4.22%	2.03%
Bank Berenberg	13.72%	9.49%	0.14%	9.25%	2.29%
Goldman Sachs International	7.44%	5.38%	0.88%	4.49%	1.54%

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
Bank Vontobel AG	46.28%	36.08%	0.00%	36.00%	0.03%
Square Global Ltd	12.31%	2.77%	0.00%	2.76%	0.00%
Jefferies International Ltd.	7.89%	12.79%	0.19%	12.57%	1.57%
Goldman Sachs International	7.61%	5.89%	0.35%	5.53%	0.89%
UBS Switzerland AG	6.66%	5.60%	1.06%	4.17%	1.39%

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	
Deutsche Bank AG	8.01%	5.34%	1.34%	3.81%	0.44%	
Citigroup Global Markets	7.73%	6.58%	1.09%	5.16%	0.91%	
Morgan Stanley & Co. Intl.	6.99%	8.81%	1.68%	6.79%	1.44%	
JP Morgan Chase	6.76%	6.23%	1.33%	4.47%	0.88%	
Jane Street Financial Limited	6.33%	11.68%	2.40%	9.04%	1.60%	

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	
Citigroup Global Markets	6.68%	10.88%	0.32%	10.08%	6.40%	
Royal Bank of Canada Europe Ltd.	6.09%	11.52%	0.00%	11.52%	5.28%	
Goldman Sachs International	5.98%	13.28%	0.00%	12.96%	8.48%	
Morgan Stanley & Co. Intl.	5.50%	9.44%	0.48%	8.80%	5.44%	
Royal Bank Of Scotland Plc	4.33%	4.00%	0.00%	3.84%	2.08%	

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	63.61%	2.37%	0.00%	2.09%	0.20%	
Jane Street Financial Limited	12.01%	16.60%	0.02%	16.35%	2.53%	
Flow Traders BV	7.64%	8.86%	0.02%	8.69%	1.33%	
Optiver VOF	1.96%	2.51%	0.01%	2.18%	0.38%	
UBS Switzerland AG	1.68%	15.74%	3.22%	10.32%	5.28%	

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
UBS Switzerland AG	100.00%	100.00%	32.28%	55.95%	51.86%

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
UBS Switzerland AG	100.00%	100.00%	4.17%	95.83%	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	19.56%	19.45%	0.00%	0.00%	0.00%
BNP Paribas SA	15.79%	8.95%	0.00%	0.00%	0.00%
Citibank NA	11.60%	1.95%	0.00%	0.00%	0.00%
Bank Vontobel AG	8.23%	21.48%	0.00%	12.90%	0.00%
Morgan Stanley & Co. Intl.	6.46%	1.22%	0.00%	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.	31.19%	30.38%	0.00%	0.00%	0.00%
Square Global Ltd	19.85%	0.09%	0.00%	0.00%	0.00%
Jane Street Financial Limited	18.79%	0.31%	0.04%	0.26%	0.00%
Merrill Lynch International	11.26%	0.04%	0.00%	0.04%	0.00%
Citigroup Global Markets	7.13%	0.04%	0.04%	0.00%	0.00%

rothschildandco.com

Rothschild & Co Bank AG

Zollikerstrasse 181

8034 Zurich

+41 44 384 71 11

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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