

Private Bank



Citi Private Bank Quality of Execution Report

Citibank N.A., London Branch

30 April 2019

1. Scope and Purpose

This report (the "Report") applies to Citi Private Bank, acting through Citibank N.A., London Branch and affiliates to whom it may delegate certain functions ("Citi", "we" or "us"). This Report should be read in conjunction with our Order Execution Policy (the "Order Execution Policy") which sets out the general basis on which we aim to provide "best execution" when executing orders in respect of financial instruments as defined in the European Union's Markets in Financial Instruments Directive (known as "MiFID II") for you, whether on your instruction or on a discretionary basis on your behalf ("Orders") as required by MiFID II and the Conduct of Business Rules of the UK Financial Conduct Authority (the "FCA"), collectively (the "Rules").

This Report summarises our analysis and conclusions drawn from the monitoring of the quality of execution obtained on the execution venues where Orders were executed for each asset class for the calendar year 2018 (the "Reporting Period"). Section 2 covers our non-discretionary business and Section 3 covers our discretionary business.

This Report should also be read in conjunction with our quantitative report showing the Top 5 execution venues where your Orders were executed during the Reporting Period, which is also available on our website: <https://www.privatebank.citibank.com/home/best-execution-europe.html>. Note that, in order to avoid duplication and for greater transparency in the quantitative report, in showing the Top 5 execution venues where your Orders were executed, we have not included affiliated brokers that we used to execute your Orders in circumstances where the execution by them is in name only and has otherwise been directly controlled by us. In such cases, we have looked through the affiliate to the execution venue where your Order was executed.

2. Non-discretionary business

2.1 .General

This section relates to advisory and execution-only Orders that we executed:

- (i) as agent on your behalf with the execution venues listed in Appendix 2 of our Order Execution Policy in respect of: (a) Equities (Shares and Depositary Receipts), (b) Debt Instruments (Bonds and Money Market Instruments), (c) Securitised Derivatives (Rights) (d) Securitised Derivatives (Structured Notes), (e) Exchange Traded Products (Exchange Traded Funds, Exchange Traded Notes), (f) Futures and Options admitted to trading on a trading venue (including interest rate derivatives, credit derivatives, currency derivatives, equity derivatives, commodities derivatives and emission allowance derivatives);
- (ii) as riskless principal with the execution venues listed in Appendix 2 of our Order Execution Policy in respect of the following financial instruments that are not Futures and Options admitted to trading on a trading venue, referred to in this Report as: (a) OTC Interest Rate Derivatives, (b) OTC Credit Derivatives, (c) OTC Equity Derivatives, (d) OTC Commodities Derivatives and (e) OTC Currency Derivatives and (f) OTC Precious Metal Currency Derivatives; and
- (iii) as principal in respect of Structured Instruments (Premium Instruments and Market-Linked Instruments).

2.2 . Relative importance of execution factors

The Rules require us to provide you with an explanation of the relative importance we gave to the execution factors of price, cost, speed, likelihood of execution or any other consideration including qualitative factors when assessing the quality of execution during the Reporting Period.

Per section 2.6, we do not differentiate between retail and professional clients when executing Orders so, in terms of the above execution factors, we placed the highest emphasis on total consideration (meaning the price of the financial instrument and the costs of execution) including all expenses incurred by the client which are directly related to the execution of the Order, including execution venue fees, clearing and settlement fees and any other fees paid to third parties involved in the execution of the Order. On occasion, we may have given precedence to speed, likelihood of execution and settlement, the size and nature of the order, market impact and any other implicit transaction costs over the immediate price and cost consideration but only insofar as they were instrumental in delivering the best possible result in terms of the total consideration to the client.

2.3 . Our assessment of the quality of execution during the Reporting Period

2.3.1 Equities – Shares and Depositary Receipts

i) Our assessment of the quality of execution	<p>Our non-discretionary business executes all Equity Orders through a single execution venue. In respect of the Reporting Period, our assessment of the quality of execution of this venue was performed through monthly post-trade monitoring of all Equities Orders against the relevant benchmarks provided by an independent third party vendor.</p> <p>We utilised independent third party technology and data analytics to complete this assessment to determine whether we are providing best execution on a consistent basis in terms of total consideration, which is comprised of price and cost. The status and outcome of our assessment of the quality of execution is reported to an internal governance committee. These combined steps enable us to ensure that we have taken all reasonable steps to obtain best execution on a consistent basis in respect of Equities Orders.</p>
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<p>ii) Any change in execution venues during the Reporting Period?</p> <p>The Rules require us to provide you with an explanation of the factors that led to a change in the list of execution venues listed in our Order Execution Policy, if such a change occurs.</p>	<p>There were no changes in the list of execution venues during the Reporting Period.</p>
<p>iii) Payments/Inducements</p> <p>The Rules require us to provide you with a description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received.</p>	<p>For Equities, as referenced in our Fee Schedule, brokerage charges are payable to the execution venue, which may vary depending on the market.</p> <p>For Equities, we have negotiated fee agreements with our execution venue regarding the brokerage charge payable for each market.</p> <p>See section 2.5 for general disclosure re Payments/Inducements.</p>

2.3.2 Debt Instruments – Bonds and Money Market Instruments

<p>i) Our assessment of the quality of execution</p>	<p>Our non-discretionary business has an open architecture approach in respect of Debt Instruments and our assessment of the quality of execution for the Reporting Period was performed through pre-trade checks as well as post-trade monitoring. In this regard, we ordinarily sought to obtain multiple quotes from our execution venues for each trade and execute at the best available price. Due to the large variance in liquidity across the different Debt Instruments traded, in some cases it was necessary, in an illiquid market where only one quote was received from the multiple executing venues who were asked to quote, to place the highest priority on the likelihood of execution.</p> <p>For our post trade monitoring, we utilised third party technology and data analytics. The outcome of our pre-and post-trade assessment of the quality of execution was reported to an internal governance committee to ensure that we had taken all reasonable steps to obtain the best possible result on a consistent basis in respect of Debt Instrument Orders.</p>
<p>ii) Any change in execution venues during the Reporting Period?</p> <p>The Rules require us to provide you with an explanation of the factors that led to a change in the list of execution venues listed in our Order Execution Policy, if such a change occurs.</p>	<p>Wells Fargo was added as an execution venue for Debt Instruments during the Reporting Period to broaden the pool of liquidity in Debt Instruments as part of the overall objective to achieve best execution on a consistent basis.</p>
<p>iii) Payments/Inducements</p> <p>The Rules require us to provide you with a description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received.</p>	<p>We do not negotiate discounts with the execution venues for Debt Instruments. Please note, however, that, as set out in section 2.2, the prices we received from the relevant execution venues were a factor in seeking to achieve the best possible results on a consistent basis and such prices will have included an embedded mark-up or mark-down by the execution venues.</p> <p>See section 2.5 for general disclosure re Payments/Inducements.</p>

2.3.3 Exchange Traded Products (Exchange-Traded Funds (“ETFs”) and Exchange-Traded Notes (“ETNs”))

<p>i) Our assessment of the quality of execution</p>	<p>Our non-discretionary business executes all ETFs and ETNs through a single execution venue. In respect of the Reporting Period, our assessment of the quality of execution of this venue was performed through monthly post-trade monitoring of all Orders for ETFs and ETNs on a sample basis against a relevant independent benchmark.</p> <p>We utilised independent third party technology and data analytics to complete this assessment. The outcome of our assessment of the quality of execution is reported to an appropriate internal governance committee to ensure we had taken all reasonable steps to obtain best execution on a consistent basis in respect of ETFs and ETN Orders.</p>
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<p>ii) Any change in execution venues during the Reporting Period?</p> <p>The Rules require us to provide you with an explanation of the factors that led to a change in the list of execution venues listed in our Order Execution Policy, if such a change occurs.</p>	<p>There were no changes in the list of execution venues during the Reporting Period.</p>
<p>iii) Payments/Inducements</p> <p>The Rules require us to provide you with a description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received.</p>	<p>For ETFs and ETNs, as referenced in our Fee Schedule, brokerage charges are payable to the execution venue, which may vary depending on the market.</p> <p>For ETFs and ETNs, we have negotiated fee agreements with our execution venue, regarding the brokerage charge payable for each market.</p> <p>See section 2.5 for general disclosure re Payments/Inducements.</p>

2.3.4 Futures and Options admitted to trading on a trading venue (including interest rate derivatives, credit derivatives, currency derivatives, equity derivatives, commodities derivatives and emission allowances derivatives) ("Listed Derivatives")

<p>i) Our assessment of the quality of execution</p>	<p>Our non-discretionary business executes all listed derivatives through a single execution venue. In respect of the Reporting Period, our internal trading systems always displayed the best bid/offer prices available on the relevant trading venue for each transaction, meaning we could only execute Listed Derivative transactions at the best available price.</p>
<p>ii) Any change in execution venues during the Reporting Period?</p> <p>The Rules require us to provide you with an explanation of the factors that led to a change in the list of execution venues listed in our Order Execution Policy, if such a change occurs.</p>	<p>There were no changes in the list of execution venues during the Reporting Period.</p>
<p>iii) Payments/Inducements</p> <p>The Rules require us to provide you with a description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received.</p>	<p>For Listed Options, as referenced in our Fee Schedule, we have negotiated fee agreements with our execution venue regarding the brokerage charge payable for each market.</p> <p>See section 2.5 for general disclosure re Payments/Inducements.</p>

2.3.5 Securitised Derivatives (Structured Notes)

<p>i) Our assessment of the quality of execution</p>	<p>Our non-discretionary business has an open architecture approach in respect of Structured Notes and our assessment of the quality of execution was performed through pre-trade checks as well as monthly post-trade monitoring on a sample basis. In this regard, during the Reporting Period, we ordinarily obtained a minimum of two separate quotes from our execution venues (unless specifically directed by the client to execute the Order with a particular execution venue) to ensure we had taken all reasonable steps to obtain the best possible result on a consistent basis in respect of Structured Note Orders.</p> <p>We reported the outcome of our assessment of the quality of execution to an internal governance committee to ensure we had taken all reasonable steps to obtain the best possible result on a consistent basis in respect of Structured Note Orders.</p>
<p>ii) Any change in execution venues during the Reporting Period?</p> <p>The Rules require us to provide you with an explanation of the factors that led to a change in the list of execution venues listed in our Order Execution Policy, if such a change occurs.</p>	<p>There were no changes in the list of execution venues during the Reporting Period.</p>
<p>iii) Payments/Inducements</p> <p>The Rules require us to provide you with a description of any specific arrangements with any execution venues regarding</p>	<p>See section 2.5 for general disclosure re Payments/Inducements.</p>

payments made or received, discounts, rebates or non-monetary benefits received.	
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2.3.6 Securitised Derivatives (Rights)

i) Our assessment of the quality of execution	<p>Our non-discretionary business executes all securitised derivatives through a single execution venue. In respect of the Reporting Period, our assessment of the quality of execution, of this venue was performed through monthly pre-trade checks and post-trade monitoring of all Rights Orders against a relevant independent benchmark.</p> <p>We utilised independent third party technology and data analytics to complete this assessment. The outcome of our assessment of the quality of execution is reported to an internal governance committee to ensure we had taken all reasonable steps to obtain best execution on a consistent basis in respect of Rights Orders.</p>
ii) Any change in execution venues during the Reporting Period? The Rules require us to provide you with an explanation of the factors that led to a change in the list of execution venues listed in our Order Execution Policy, if such a change occurs.	There were no changes in the list of execution venues during the Reporting Period.
iii) Payments/Inducements The Rules require us to provide you with a description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received.	<p>For Rights Orders, as referenced in our Fee Schedule, brokerage charges are payable to the execution venue, which may vary depending on the market.</p> <p>For Rights, we have negotiated fee agreements with our execution venue regarding the brokerage charge payable for each market.</p> <p>See section 2.5 for general disclosure re Payments/Inducements.</p>

2.3.7 OTC Interest Rate Derivatives and OTC Credit Derivatives

i) Our assessment of the quality of execution	<p>Our non-discretionary business executes all OTC Interest Rate Derivatives and OTC Credit Derivatives through a single execution venue. For all such OTC Interest Rate Derivatives and OTC Credit Derivatives, our approach to the assessment of the quality of execution of this venue was ordinarily performed through pre-trade checks as well as post-trade monitoring on a sample basis.</p> <p>The purpose of these pre-trade checks and post trade monitoring was to ensure that such OTC Interest Rate Derivatives and OTC Credit Derivatives were executed within an acceptable range tolerance compared to the prevailing market rate. This is to ensure we had taken all reasonable steps to obtain the best possible result on a consistent basis in respect of Orders in such OTC Interest Rate Derivatives and OTC Credit Derivatives during the Reporting Period.</p> <p>We reported the outcome of our assessment of the quality of execution to an internal governance committee to ensure we had taken all reasonable steps to obtain the best possible result on a consistent basis in respect of OTC Interest Rate Derivatives and OTC Credit Derivatives.</p>
ii) Any change in execution venues during the Reporting Period? The Rules require us to provide you with an explanation of the factors that led to a change in the list of execution venues listed in our Order Execution Policy, if such a change occurs.	There were no changes in the list of execution venues during the Reporting Period.
iii) Payments/Inducements The Rules require us to provide you with a description of any	We do not negotiate discounts with the execution venue for OTC Interest Rate Derivatives and OTC Credit Derivatives. Please note, however, that, as set out in section 2.2, the prices we

specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received.	received from the relevant execution venue were a factor in seeking to achieve the best possible results on a consistent basis and such prices will have included an embedded mark-up or mark-down by the execution venue. See section 2.5 for general disclosure re Payments/Inducements.
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2.3.8 OTC Equity Derivatives and OTC Commodities Derivatives

i) Our assessment of the quality of execution	<p>Our non-discretionary business executes all OTC Equity Derivatives and OTC Commodity Derivatives through a single execution venue. For OTC Equity Derivatives and OTC Commodity Derivatives, our approach to the assessment of the quality of execution was performed through pre-trade reasonability checks to check the price against the prevailing prices for the equivalent listed product, where available using independent third party data sources and pricing tools.</p> <p>The purpose of these pre-trade checks was to ensure that such OTC Equity Derivatives and OTC Commodity Derivatives were executed within an acceptable range tolerance compared to the prevailing market rate. This is to provide a reasonable level of assurance that we achieved best execution on a consistent basis for Orders in such OTC Equity Derivatives and OTC Commodity Derivatives during the Reporting Period.</p> <p>We reported the outcome of our assessment of the quality of execution to an internal governance committee to ensure we had taken all reasonable steps to obtain the best possible result on a consistent basis in respect of OTC Equity Derivatives and OTC Commodity Derivatives.</p>
ii) Any change in execution venues during the Reporting Period? The Rules require us to provide you with an explanation of the factors that led to a change in the list of execution venues listed in our Order Execution Policy, if such a change occurs.	There were no changes in the list of execution venues during the Reporting Period.
iii) Payments/Inducements The Rules require us to provide you with a description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received.	<p>We do not negotiate discounts with the execution venue for OTC Equity Derivatives and OTC Commodities Derivatives. Please note, however, that, as set out in section 2.2, the prices we received from the relevant execution venue were a factor in seeking to achieve the best possible results on a consistent basis and such prices will have included an embedded mark-up or mark-down by the execution venue.</p> <p>See section 2.5 for general disclosure re Payments/Inducements.</p>

2.3.9 OTC Currency Derivatives and OTC Precious Metal Currency Derivatives

i) Our assessment of the quality of execution	<p>Our non-discretionary business has an open architecture approach in respect of such OTC Currency Derivatives and OTC Precious Metal Currency Derivatives and our assessment of the quality of execution was performed through post-trade monitoring.</p> <p>For all such OTC Currency Derivatives and OTC Precious Metal Currency Derivatives, we also assessed the quality of execution through post-trade rate reasonability checks. The purpose of this review was to ensure that such OTC Currency Derivatives and OTC Precious Metal Currency Derivatives were executed within an acceptable range tolerance compared to the prevailing market rate. This is to ensure we had taken all reasonable steps to obtain the best possible result on a consistent basis for Orders in such OTC Currency Derivatives and OTC Precious Metal Currency Derivatives.</p>
ii) Any change in execution venues during the Reporting Period? The Rules require us to provide you with an explanation of the factors that led to a change in the list of execution	There were no changes in the list of execution venues during the Reporting Period.

	venues listed in our Order Execution Policy, if such a change occurs.	
iii)	Payments/Inducements The Rules require us to provide you with a description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received.	We do not negotiate discounts with the execution venues for OTC Currency Derivatives and OTC Precious Metal Currency Derivatives. Please note, however, that, as set out in section 2.2, the prices we received from the relevant execution venues were a factor in seeking to achieve the best possible results on a consistent basis and such prices will have included an embedded mark-up or mark-down by the execution venues. See section 2.5 for general disclosure re Payments/Inducements.

2.3.10 Structured Instruments (Premium Instruments and Market-Linked Instruments)

i)	Our assessment of the quality of execution	We did not execute Premium Instruments and Market-Linked Instrument Orders during the Reporting period.
ii)	Any change in execution venues during the Reporting Period? The Rules require us to provide you with an explanation of the factors that led to a change in the list of execution venues listed in our Order Execution Policy, if such a change occurs.	There were no changes in the list of execution venues during the Reporting Period.
iii)	Payments/Inducements The Rules require us to provide you with a description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received.	See section 2.5 for general disclosure re Payments/Inducements.

2.4 . Close links, conflicts and common ownership

The Rules require us to provide you with a description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute Orders during the Reporting Period.

Per our Order Execution Policy, we may, for certain asset classes, have executed your Order with affiliated Citi brokers and issuers, including but not limited to Citigroup Global Markets Limited, Citigroup Global Markets Inc., Citigroup Global Markets Holding Inc. and Citigroup Inc.

Under the Rules, we are required to maintain and operate effective organisational and administrative arrangements with a view to taking all appropriate steps to identify, monitor, prevent or manage such conflicts of interest. We have put in place a policy to meet this obligation and refer you to our terms of business where you will find a summary of that policy and the key information that is needed by clients to understand the measures we are taking to safeguard the interests of our clients.

2.5 . Payments/Inducements

The Rules require us to provide you with a description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received during the Reporting Period:

2.5.1 Payments made to execution venues

An estimate of any fees payable to execution venues is, where possible and relevant, reflected in the Fee Schedule to our terms of business. See section 2.3 above for further details.

2.5.2 Discounts received from execution venues: see section 2.3 above for further details in respect of particular classes of financial instruments.

2.5.3 Rebates/Payments received from execution venues

We did not receive rebates or other payments from the execution venues during the Reporting Period.

2.5.4 Non-monetary benefits received from execution venues

Please note, per our terms of business that we may also have received certain minor non-monetary benefits from execution venues during the Reporting Period, including but not limited to the following:

- i. Invitations to participate in conferences, seminars and other training events on the benefits and features of a specific financial instrument;
- ii. Hospitality of a reasonable de minimis value, such as food and drink during a business meeting or a conference, seminar or other training events;
- iii. Pre-deal research for prospective investors relating to an issue of shares, debentures, warrants or certificates representing certain securities by an issuer, produced by an underwriter or placement agent; and

- iv. Generic or personalised information or documentation relating to a financial instrument or an investment service, including focus lists and market commentary.

We were charged for the provision of or access to this research in accordance with commercially agreed terms with the relevant execution venue or broker.

Further information on the above arrangements is available on request.

2.6 . Did we treat retail and professional clients differently?

Under the Rules, we have to provide you with an explanation of how order execution differed according to client categorisation, where we treated categories of clients differently and where it may affect the order execution arrangements. Whilst we have both retail and professional clients, we did not weight the execution factors differently based on client categorisation during the Reporting Period.

2.7 . Were price and cost always given precedence for retail clients during the Reporting Period?

The Rules require us to provide you with an explanation of whether other criteria were given precedence over immediate price and cost when executing retail client Orders and how these other criteria were instrumental in delivering the best possible result in terms of the total consideration to the client during the Reporting Period.

In accordance with our Order Execution Policy, during the Reporting Period, the best possible result was determined for retail clients in terms of total consideration (price and all costs) alone meaning that we placed the highest emphasis on total consideration (meaning the price of the financial instrument and the costs of execution) including all expenses incurred by the client which are directly related to the execution of the Order, including execution venue fees, clearing and settlement fees and any other fees paid to third parties involved in the execution of the Order. On occasion we may have given precedence to speed, likelihood of execution and settlement, the size and nature of the order, market impact and any other implicit transaction costs over the immediate price and cost consideration but only insofar as they were instrumental in delivering the best possible result in terms of the total consideration to the client.

2.8 . How have we used any data or tools relating to the quality of execution, including any data published under Delegated Regulation (EU) 2017/575 (“RTS 27”)?

The Rules require us to provide you with an explanation of how we have used any data or tools relating to the quality of execution, including any data published by execution venues under RTS 27. In summary, this data includes: (a) periodic information regarding the quality of execution of transactions on that execution venue (b) intra-day daily price streaming, (c) publication of costs, (d) publication of likelihood of execution. We have not reviewed data provided by execution venues under RTS 27 during the Reporting Period but have made this available on our website: <https://www.privatebank.citibank.com/home/best-execution-europe.html> under [Links to execution quality data of Citi Private Bank's Brokers for Advisory and Execution Only Orders as per Art 27\(3\) of MiFID II and RTS 27.](#)

2.9 . Use of output from Consolidated Tape Providers

The Rules require us to provide you, where applicable, with an explanation of how we have used the output of a “consolidated tape provider” (“CTP”) established under Article 65 of MiFID II. A CTP is a person authorized to provide the service of collecting trade reports for financial instruments from regulated markets, MTFs, OTFs and Approved Publication Arrangements and consolidating them into a continuous consolidated tape providing price and volume data per financial instrument.

We did not use the output of a CTP during the Reporting Period.

3. Discretionary business

3.1 . General

This section relates to discretionary Orders that we executed as agent on your behalf with the execution venues listed in Appendix 2 of our Order Execution Policy in respect of: (a) Equities (Shares and Depositary Receipts); (b) Debt Instruments (Bonds and Money Market Instruments); (c) OTC Currency Derivatives (Swaps and Forwards); and (d) Exchange Traded Products (Exchange Traded Funds).

3.2 . Relative importance of execution factors

The Rules require us to provide you with an explanation of the relative importance we gave to the execution factors of price, cost, speed, likelihood of execution or any other consideration including qualitative factors when assessing the quality of execution during the Reporting Period.

We do not differentiate between retail and professional clients when executing Orders so, in terms of the above execution factors, we placed the highest emphasis on total consideration (meaning the price of the financial instrument and the costs of execution) including all expenses incurred by the client which are directly related to the execution of the Order, including execution venue fees, clearing and settlement fees and any other fees paid to third parties involved in the execution of the Order. The only exception to this was with respect to illiquid Bonds, where there may not have been a choice of execution venues, and where likelihood of execution then became a more important consideration.

3.3 . Our assessment of the quality of execution during the Reporting Period

3.3.1 Equities – Shares and Depositary Receipts

<p>i) Our assessment of the quality of execution</p>	<p>Our discretionary business has an open architecture approach in respect of Equities. Trading activity is aimed at achieving the best result in terms of total consideration, which comprises price and cost. As execution costs across all the venues used for Equities was the same per market region, our assessment of the quality of execution was based on an analysis of the prices achieved in relation to prevailing prices during the execution period for each trade.</p> <p>Our monitoring of the quality of execution was assessed on a post-trade basis via sample testing, together with Transaction Cost Analysis provided by a third party provider. We reported the outcome of that assessment to an internal brokerage committee on a quarterly basis, where the analysis was reviewed to enable us to determine that we had taken all reasonable steps to obtain the best possible result on a consistent basis.</p> <p>The counterparty risk of each venue as well as the quality of clearing and settlement was also assessed on a regular basis and at least quarterly.</p>
<p>ii) Any change in execution venues during the Reporting Period?</p> <p>The Rules require us to provide you with an explanation of the factors that led to a change in the list of execution venues listed in our Order Execution Policy, if such a change occurs.</p>	<p>During the Reporting Period we added one venue (JP Morgan Chase Securities) for increased liquidity in Equities.</p>

3.3.2 Debt Instruments – Bonds and Money Market Instruments

<p>i) Our assessment of the quality of execution</p>	<p>Our discretionary business has an open architecture approach in respect of Debt Instruments. Trading activity is aimed at achieving the best result in terms of total consideration, which comprises price and cost. As trading is conducted net of commission, the discretionary trading desk sought to obtain multiple quotes from its execution venues for each trade and execute at the best available price. Due to the large variance in liquidity across the different Debt Instruments traded, in some cases it was necessary, in an illiquid market where only one quote was received from the multiple executing venues who were asked to quote, to place the highest priority on likelihood of execution.</p> <p>Our monitoring of the quality of execution was assessed on a post-trade basis via sample testing. We reported the outcome of that assessment to an internal brokerage committee on a quarterly basis, where the analysis was reviewed to enable us to determine that we had taken all reasonable steps to obtain the best possible result on a consistent basis.</p> <p>The counterparty risk of each venue as well as the quality of clearing and settlement was also assessed on a regular basis and at least quarterly.</p>
<p>ii) Any change in execution venues during the Reporting Period?</p> <p>The Rules require us to provide you with an explanation of the factors that led to a change in the list of execution venues listed in our Order Execution Policy, if such a change occurs.</p>	<p>During the Reporting Period we added two venues (Zurcher Kantonalbank and Banco Santander) for further pricing in Debt Instruments and removed five venues (DZ Bank Germany, Knight Execution & Clearing Services LLC, US Bancorp, Vinning Sparks, ICAP Plc). These venues were removed as it was determined that the existing venues were able to provide sufficient pricing for the in scope instruments.</p>

3.3.3 OTC Currency Derivatives (Swaps and Forwards)

<p>i) Our assessment of the quality of execution</p>	<p>Our discretionary business has an open architecture approach, whereby quotes for Currency Derivative Orders are obtained from the brokers listed at Appendix 2 of the Order Execution Policy by placing the Order via the FXALL trading venue and</p>
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	<p>accepting the offer with the broker quoting at the best rate. As currency trading is conducted net of commission, the quality of execution was assessed in relation to the best price available amongst the multiple prices provided by the FX executing venues in FXAll at the time.</p> <p>The quality of execution was monitored on an ex-post basis via sample testing of the trades executed through FXAll to check that they were executed at the best available price at the time. We reported the outcome of that assessment to an internal brokerage committee on a quarterly basis, where the analysis was reviewed to enable us to determine that we had taken all reasonable steps to obtain the best possible result on a consistent basis.</p>
<p>ii) Any change in execution venues during the Reporting Period?</p> <p>The Rules require us to provide you with an explanation of the factors that led to a change in the list of execution venues listed in our Order Execution Policy, if such a change occurs.</p>	<p>During the reporting period we removed one venue (Natixis) used for Currency Derivatives during the Reporting Period. It was determined that existing venues were able to provide sufficient pricing for currency derivatives execution.</p>

3.3.4 Exchange Traded Products (Exchange Traded Funds ("ETFs"))

<p>i) Our assessment of the quality of execution</p>	<p>Trading activity in ETFs is aimed at achieving the best result in terms of total consideration, which comprises price and cost. As execution costs across all the venues used for ETFs was the same, our assessment of the quality of execution was based on an analysis of the prices achieved in relation to prevailing prices during the execution period for each trade.</p> <p>Our monitoring of the quality of execution was assessed on a post-trade basis via sample testing, together with Transaction Cost Analysis provided by a third party provider. We reported the outcome of that assessment to an internal brokerage committee on a quarterly basis, where the analysis was reviewed to enable us to determine that we had taken all reasonable steps to obtain the best possible result on a consistent basis.</p> <p>The counterparty risk of each venue as well as the quality of clearing and settlement was also assessed on a regular basis and at least quarterly.</p>
<p>ii) Any change in execution venues during the Reporting Period?</p> <p>The Rules require us to provide you with an explanation of the factors that led to a change in the list of execution venues listed in our Order Execution Policy, if such a change occurs.</p>	<p>During the Reporting Period we added three venues (Deutsche Bank, Cantor Fitzgerald Europe and Susquehanna Financial Group) for increased liquidity in ETFs.</p>

3.4 Close links, conflicts and common ownership

The Rules require us to provide you with a description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute Orders during the Reporting Period.

There were no close links to any execution venues used to execute Orders during the Reporting Period and none are under common ownership.

Under the Rules, we are required to maintain and operate effective organisational and administrative arrangements with a view to taking all appropriate steps to identify, monitor, prevent or manage any conflicts of interest. We have put in place a policy to meet this obligation and refer you to your terms of business with us where you will find a summary of that policy and the key information required by clients to understand the measures we are taking to safeguard the interests of our clients.

3.5 . Payments/Inducements

The Rules require us to provide you with a description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received during the Reporting Period:

3.5.1 Payments made

No special payment/pricing arrangements were made with any execution venues during the Reporting Period.

3.5.2 Discounts

We did not receive any discounts from any execution venues used in connection with discretionary Orders during the Reporting Period.

3.5.3 Rebates/Payments received

We did not receive rebates or other payments from any execution venues used in connection with discretionary Orders during the Reporting Period.

3.5.4 Non-monetary benefits

During the Reporting Period employees of the discretionary business attended conferences, seminars and other training events relating to financial instruments utilised in the discretionary portfolios and received hospitality (lunch and/or dinner) during these events.

Further information on the above arrangements is available on request.

3.6 . Do we treat retail and professional clients differently?

Under the Rules, we have to provide you with an explanation of how order execution differs according to client categorisation, where we treat categories of clients differently and where it may affect the order execution arrangements.

Whilst we have both retail and professional clients, we do not weight the execution factors differently based on client categorization. Orders are placed on an aggregated basis and executed as one block Order, irrespective of client categorisation.

3.7 . Were price and cost always given precedence for retail clients during the Reporting Period?

The Rules require us to provide you with an explanation of whether other criteria were given precedence over immediate price and cost when executing retail client Orders and how these other criteria were instrumental in delivering the best possible result in terms of the total consideration to the client during the Reporting Period.

In accordance with our Order Execution Policy, during the Reporting Period, the best possible result was determined for retail clients in terms of total consideration (price and all costs) meaning that we placed the highest emphasis on total consideration (meaning the price of the financial instrument and the costs of execution) including all expenses incurred by the client which are directly related to the execution of the Order, including execution venue fees, clearing and settlement fees and any other fees paid to third parties involved in the execution of the Order. The only exception to this was with respect to illiquid Bonds where it was sometimes necessary to place the highest priority on likelihood of execution, as set out in section 3.3.2(i).

3.8 . How have we used any data or tools relating to the quality of execution, including any data published under Delegated Regulation (EU) 2017/575 ("RTS 27")?

The Rules require us to provide you with an explanation of how we have used any data or tools relating to the quality of execution, including any data published by execution venues under RTS 27. In summary, this data includes: (a) periodic information regarding the quality of execution of transactions on that execution venue (b) intra-day daily price streaming, (c) publication of costs, (d) publication of likelihood of execution.

Our discretionary business did not utilise any data or tools published under RTS 27 by execution venues for the Reporting Period, to assess the quality of execution. The quality of execution was assessed on a post-trade basis and reported to an internal brokerage committee on a quarterly basis together with Transaction Cost Analysis provided by a third party provider. The analysis was reviewed to enable us to determine that we had taken all reasonable steps to obtain the best possible result on a consistent basis.

3.9 . Use of output from Consolidated Tape Providers

The Rules require us to provide you, where applicable, with an explanation of how we have used the output of a CTP established under Article 65 of MiFID II. A CTP is a person authorized to provide the service of collecting trade reports for financial instruments from regulated markets, MTFs, OTFs and Approved Publication Arrangements and consolidating them into a continuous consolidated tape providing price and volume data per financial instrument. We did not use the output of a CTP during the Reporting Period, as these outputs were not available during that time.

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