

**Top 5 Brokers & Qualitative RTS 28 Report**

# Best Execution 2019

## Top 5 Brokers 2019

<b>Class of Instrument</b>	<b>Equities-Shares Depository Receipts (liquidity band 1&amp;2 - 0 - 79 trades per day)</b>				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	N				
<b>Top 5 Brokers ranked in terms of volume (descending order)</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
<b>UBS AG</b>	99,44%	98,56%	100,00%	0,00%	100,00%
<b>ABN AMRO Bank N.V</b>	0,54%	1,36%	100,00%	0,00%	100,00%
<b>KBC Bank</b>	0,02%	0,08%	100,00%	0,00%	100,00%

<b>Class of Instrument</b>	<b>Equities-Shares Depository Receipts (liquidity band 3&amp;4 - 80 - 1999 trades per day)</b>				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	N				
<b>Top 5 Brokers ranked in terms of volume (descending order)</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
<b>UBS AG</b>	98,93%	98,92%	100,00%	0,00%	100,00%
<b>ABN AMRO Bank N.V</b>	1,07%	1,08%	100,00%	0,00%	100,00%

<b>Class of Instrument</b>	<b>Equities-Shares Depository Receipts (liquidity band 5&amp;6 - from 2000 trades per day)</b>				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	<b>N</b>				
<b>Top 5 Brokers ranked in terms of volume (descending order)</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
<b>UBS AG</b>	98,81%	98,32%	100,00%	0,00%	100,00%
<b>ABN AMRO Bank N.V</b>	1,12%	1,60%	100,00%	0,00%	100,00%
<b>BNP PARIBAS</b>	0,04%	0,04%	100,00%	0,00%	100,00%
<b>GOLDMAN SACHS INTERNATIONAL</b>	0,03%	0,02%	100,00%	0,00%	100,00%
<b>EUROCLEAR BANK</b>	0,03%	0,02%	100,00%	0,00%	100,00%

<b>Class of Instrument</b>	<b>Debt Instruments-Bonds</b>				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	<b>N</b>				
<b>Top 5 Brokers ranked in terms of volume (descending order)</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
<b>UBS AG</b>	71,87%	57,95%	100,00%	0,00%	100,00%
<b>ABN AMRO Bank N.V</b>	12,95%	36,55%	100,00%	0,00%	100,00%
<b>KBC Bank</b>	6,59%	2,34%	100,00%	0,00%	100,00%
<b>BNP PARIBAS</b>	2,77%	0,19%	100,00%	0,00%	100,00%
<b>BANQUE DEGROOF PETERCAM LUXEMBOURG S.A.</b>	1,80%	1,20%	100,00%	0,00%	100,00%

<b>Class of Instrument</b>	<b>Structured Finance Instruments</b>				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	<b>N</b>				
<b>Top 5 Brokers ranked in terms of volume (descending order)</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
<b>UBS AG</b>	34,61%	43,82%	100,00%	0,00%	100,00%
<b>BARCLAYS BANK PLC</b>	26,89%	8,31%	100,00%	0,00%	100,00%
<b>ABN AMRO Bank N.V</b>	15,37%	42,02%			
<b>BNP PARIBAS</b>	11,41%	2,25%	100,00%	0,00%	100,00%
<b>GOLDMAN SACHS INTERNATIONAL</b>	9,21%	2,25%	100,00%	0,00%	100,00%

<b>Class of Instrument</b>	<b>Real Estate Investment Trusts</b>				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	<b>N</b>				
<b>Top 5 Brokers ranked in terms of volume (descending order)</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
<b>UBS AG</b>	80,59%	70,00%	100,00%	0,00%	100,00%
<b>EUROCLEAR BANK</b>	19,41%	30,00%	100,00%	0,00%	100,00%

<b>Class of Instrument</b>	<b>Equity Derivatives-Options and Futures</b>				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	<b>N</b>				
<b>Top 5 Brokers ranked in terms of volume (descending order)</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
<b>UBS AG</b>	100,00%	100,00%	100,00%	0,00%	100,00%

<b>Class of Instrument</b>	<b>Securitized Derivatives-Other Securitized Derivatives</b>				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	N				
<b>Top 5 Brokers ranked in terms of volume (descending order)</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
<b>UBS AG</b>	63,58%	66,67%	100,00%	0,00%	100,00%
<b>ABN AMRO Bank N.V</b>	36,42%	33,33%	100,00%	0,00%	100,00%

<b>Class of Instrument</b>	<b>Securitized Derivatives-Warrants and Certificate Derivatives</b>				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	N				
<b>Top 5 Brokers ranked in terms of volume (descending order)</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
<b>UBS AG</b>	100,00%	100,00%	100,00%	0,00%	100,00%

<b>Class of Instrument</b>	<b>Other Instruments</b>				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	N				
<b>Top 5 Brokers ranked in terms of volume (descending order)</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
<b>UBS AG</b>	100,00%	100,00%	100,00%	0,00%	100,00%

<b>Class of Instrument</b>	<b>Exchange Traded Products-Exchange Traded Fonds</b>				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	<b>N</b>				
<b>Top 5 Brokers ranked in terms of volume (descending order)</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
<b>UBS AG</b>	87,54%	88,30%	100,00%	0,00%	100,00%
<b>BNP PARIBAS</b>	6,92%	0,15%	100,00%	0,00%	100,00%
<b>ABN AMRO Bank N.V</b>	5,53%	11,56%	100,00%	0,00%	100,00%

## Qualitative RTS 28 Report

Based on MIFID II legislation, European investment firms are required to publish information on how they executed client orders. In line with this requirement, ABN AMRO provides the information below to enable the public to evaluate the quality of order execution practices in the preceding year. In order to make meaningful comparisons and analyse the choice of top five execution venues, the information is published per class of financial instruments on the Bank's website.

### Order routing

ABN AMRO Bank NV, Belgian Branch, hereafter the Bank, has put in place an order routing system and a set of controls to ensure and evaluate:

- ▶ the quality of the executed orders
- ▶ the quality of the selected brokers

The order routing system ensures that all registered orders are executed using the same principles and routines. The orders registered in the order routing system are also subject to a set of automated controls and audit trail designed to protect the client and the Bank.

ABN AMRO Private Banking Belgium has outsourced the service of executing orders for equity, ETF, listed derivatives, bonds and structure products. AABE decided to use and leverage on the existing broker relations and expertise within the group.

Funds are processed using a specialised fund provider (Fundsettle), which is also our custodian for this asset class. For equity products, ETF's and listed derivatives we make use of external venues. The fees incurred from these venues are based on a commission per trade. The commission is calculated according to a fixed number of basis points of the notional amount of the trade.

Bonds are traded via the dealing desk of ABN AMRO Frankfurt, the bulk of the bond orders are executed on OTC market using a price sounding principle. If price and liquidity warrants it bonds can also be executed on an external venue. For bonds a flat fee per trade is charged.

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As we always strive to provide best execution for our clients, we choose our execution venues with utmost care. This results in long-standing professional relationships with the venues we use, built on mutual respect and a feeling of responsibility towards each other. As we are very much content with the venues we currently use, no venues have been dismissed and there is no change in the brokers used for the execution of client orders.

### **Relative importance of execution factors**

For each class of financial instruments, price and cost ('total consideration') are considered the important execution factors for client orders. The only reason we would divert from these factors is when the Bank receives a specific instruction by a client to prioritise other execution factors over these execution factors. In order to obtain a constant result for these criteria the Bank prefers using the primary markets to execute orders in listed securities. The principles defined by the Bank for order routing and execution are applied to all client orders, irrespective of client classification under MiFID.

### **Specific arrangements with execution venues**

No payments are made or received and no discounts, rebates or non-monetary benefits are received when executing client orders this principle applies to all asset classes.

### **Tooling and controls**

For data/reporting related to Best Execution the Bank uses data and tools from Reuters, Bloomberg and Cetrel. Currently the Bank does not use the service of a consolidated tape provider.

Controls and monitoring are performed objectively and independently by different departments following the three lines of defence model.

### **The quality of the executed orders**

The Bank has published on its website the Order Execution Policy that describes how the Bank executes client orders for different asset classes. To obtain a constant quality level and result (price, likelihood of execution and settlement) for the execution of his orders in listed securities the Bank prefers to use the primary exchange of the instrument. Non-listed securities such as fixed income are traded via selected brokers from the Frankfurt Dealing Desk on a "delivery versus payment" principle. To ensure that the principles described in the policy are applied, the Bank has installed a control framework to perform sample checks on the executed orders.

### **The quality of the selected brokers**

Being part of the ABN AMRO Group, the Bank has decided to use and leverage on the existing broker relations and expertise within the group. In this context the Bank executes client orders using the preferred brokers of the Group. For listed securities the main broker is UBS AG with whom the Bank has a broker/custodian relation. Non-listed securities are executed using the approved brokers from the ABN AMRO Dealing Desk in Frankfurt on a delivery versus payment principle.

The Bank performs a periodical review of the brokers and counterparties it selects to execute orders for its clients.