



## Information on the identity of execution venues and on the quality of execution (RTS 28)

## UBP SA, London Branch, Asset Management

2018

Note: there was no information available in our systems from our data provider enabling us to classify transactions as passive, aggressive or directed orders.

## Top execution venues

## (a) Equities – Shares &amp; Depositary Receipts

## Average volume

## More than 1 average trade per business day in the previous year

(a1) Tick size liquidity bands 5 and 6 (from 2000 trades per day)

Top execution venues	Proportion of total volume traded	Proportion of total executed orders
UBS Limited Programme (BFM8T61CT2L1QCEMIK50)	24.70%	43.64%
ITG Europe, London (549300UNSOE0CCKL0C57)	18.62%	9.99%
Mirabaud & Cie, banquiers privés, Geneva (549300UNSOE0CCKL0C57)	15.10%	7.28%
Exane Equity Algos (213800SH9MTNZQJKP526)	7.50%	4.32%
Tourmaline (213800MWJ1TXNQIF5J22)	5.34%	4.03%

(a2) Tick size liquidity bands 3 and 4 (from 80 to 1999 trades per day)

Top execution venues	Proportion of total volume traded	Proportion of total executed orders
Bank Vontobel AG, Zurich (549300L7V4MGECYRM576)	35.88%	8.20%
Mirabaud & Cie, banquiers privés, Geneva (549300UNSOE0CCKL0C57)	26.25%	27.05%
ITG Europe, London (549300UNSOE0CCKL0C57)	14.50%	29.51%
UBS Limited Programme (BFM8T61CT2L1QCEMIK50)	9.87%	15.57%
Tourmaline (213800MWJ1TXNQIF5J22)	4.71%	7.38%

(a3) Tick size liquidity band 1 and 2 (from 0 to 79 trades per day)

Top execution venues	Proportion of total volume traded	Proportion of total executed orders
ITG Europe, London (549300UNSOE0CCKL0C57)	29.22%	12.58%
Exane Equity Algos (213800SH9MTNZQJKP526)	17.49%	4.64%
UBS Limited Programme (BFM8T61CT2L1QCEMIK50)	7.73%	30.46%
Mirabaud & Cie, banquiers privés, Geneva (549300UNSOE0CCKL0C57)	7.58%	1.32%
Redburn (Europe) Limited (213800PKEJQZQXQCOJ04)	6.43%	4.64%

## (b) Debt instruments

## (i) Bonds

## Average volume

## More than 1 average trade per business day in the previous year

Top execution venues	Proportion of total volume traded	Proportion of total executed orders
Jefferies International Limited (S5THZMDUJCTQZBTRV198)	12.32%	13.64%
Citigroup Global Markets Ltd (XKZZ2JZF41MRHTR1V493)	10.27%	7.79%
HSBC Bank plc, London (MP6ISZYBEU3UXPYFY54)	7.50%	6.49%
Standard Chartered Bank. (RILFO74KP1CM8P6PCT96)	7.21%	7.79%
Goldman Sachs (N9FYJ29MC81J74MJE92)	6.15%	4.22%

## (ii) Money markets instruments

No trade

## (c) Interest rates derivatives

## (i) Futures and options admitted to trading on a trading venue

No trade

## Average volume

## Less than 1 average trade per business day in the previous year

Top execution venues	Proportion of total volume traded	Proportion of total executed orders
Morgan Stanley & Co. International PLC (4PQUHN3JPFGNF3BB653)	100.00%	100.00%

## (ii) Swaps, forwards, and other interest rates derivatives

No trade

## (d) Credit derivatives

## (i) Futures and options admitted to trading on a trading venue

No trade

## (ii) Other credit derivatives

No trade

## (e) Currency derivatives

## (i) Futures and options admitted to trading on a trading venue

No trade

## (ii) Swaps, forwards, and other currency derivatives

## Average volume

## Less than 1 average trade per business day in the previous year

Top execution venues	Proportion of total volume traded	Proportion of total executed orders
UBP Luxembourg (5493003RJ3TPV33W0108)	80.48%	86.67%
J.P. Morgan Securities PLC (K6Q0W1PS1L1O4IQL9C32)	19.52%	13.33%

## (f) Structured finance instruments

No trade

## (g) Equity derivatives

## (i) Options and Futures admitted to trading on a trading venue

No trade

## (ii) Swaps and other equity derivatives

No trade

## (h) Securitised derivatives

## (i) Warrants and Certificate Derivatives

No trade

## (ii) Other securitized derivatives

No trade

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(i) Commodities derivatives and emission allowances Derivatives

(i) Options and Futures admitted to trading on a trading venue

No trade

(ii) Other commodities derivatives and emission allowances derivatives

No trade

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(j) Contracts for difference

No trade

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(k) Exchange traded products (Exchange traded funds, exchange traded notes and exchange traded commodities)

No trade

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(l) Emission allowances

No trade

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(m) Other instruments

No trade

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## Summary of the analysis and conclusions drawn from detailed monitoring of the quality of execution obtained on the execution venues where client orders were executed in the previous year

### (a) Equities – Shares & Depositary Receipts

**(a) Relative importance the firm gave to the execution factors of price, costs, speed, likelihood of execution or any other consideration including qualitative factors when assessing the quality of execution**

In order to assess the quality of execution for European equities, the Compliance functions focus on the price by comparing the price of execution against participation weighted average price on the market.

For emerging market equities, the VWAP is used to assess best execution due to the inherent volatility on that market.

**(b) Close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders**

UBP SA has a participation of 1.19% in SIX group AG, the Swiss stock exchange. UBP SA has no conflicts of interests or common ownerships with respect to any execution venues used to execute equity orders.

**(c) Specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received**

There are no specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received for the trading of equity instruments

**(d) Factors that led to a change in the list of execution venues listed in the firm's execution policy, if such a change occurred**

UBP has a detailed internal process for validating and modifying its authorised third party broker list. The UBP Bank and Broker Committee is responsible at Group level for validating and maintaining the authorised broker list. UBP will obtain assurance by means of execution arrangements from the authorised third party brokers that they have procedures in place equal to the ones adopted and implemented by UBP. UBP also ensures the ongoing monitoring and oversight of these third party brokers.

UBP considers the following as the most important factors when selecting a third party broker:

1. Size, creditworthiness and reputation of the broker (company rating);
2. A well established reputation in relation to a particular market or industry sector;
3. Clearance and settlement capabilities (such as the ability to settle DVP);
4. Access to markets and distribution networks; and
5. Availability and effectiveness of algorithmic trading strategies (Note: this is only relevant when considering an electronic trading relationship)
6. This list shall be completed with qualitative factors such as clearing schemes, circuit breakers, scheduled actions, or any other relevant consideration, and the relative importance of each factor.

**(e) How order execution differs according to client categorisation, where the firm treats categories of clients differently and where it may affect the order execution arrangements**

UBP SA London Branch, Asset management only executes transactions on behalf of eligible counterparties or professional clients and those client categories are treated similarly as far as best execution is concerned.

**(f) Other criteria that 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**

UBP SA, London Branch does not execute orders on behalf of retail clients.

**(g) An explanation of how the investment firm has used any data or tools relating to the quality of execution, including any data published under Commission Delegated Regulation EU 2017/575**

For the year 2018, the Bank used Transaction Cost Analysis reports of brokers to corroborate the qualitative assessment of best selection by its internal clients. In addition the Bank has computed the average difference between the price of execution and the Bloomberg benchmark, weighted by the trade value, as a quantitative indicator of best selection.

**(h) Where applicable, an explanation of how the investment firm has used output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU**

For the year 2018, the Bank used no data from consolidated tape providers established under Article 65 of Directive 2014/65/EU.

### (b) Debt instruments

#### (i) Bonds

**(a) Relative importance the firm gave to the execution factors of price, costs, speed, likelihood of execution or any other consideration including qualitative factors when assessing the quality of execution**

For fixed income trading, the explicit cost of execution is included in the price executed via a spread that is not public. Trading costs and fees are determined by the liquidity of the security influencing the size of the spread.

In order to assess the quality of execution, Compliance checks in the Bloomberg audit trail if the asset manager considered three different prices before deciding which broker would execute the transaction. If less than 3 prices were available, Compliance checks if the price of execution is in line with CBBT considering the size of the order versus the volume available on the market.

**(b) Close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders**

UBP SA has no close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute debt instruments orders.

**(c) Specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received**

There are no specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received for the trading of debt instruments

**(d) Factors that led to a change in the list of execution venues listed in the firm's execution policy, if such a change occurred**

UBP has a detailed internal process for validating and modifying its authorised third party broker list. The UBP Bank and Broker Committee is responsible at Group level for validating and maintaining the authorised broker list. UBP will obtain assurance by means of execution arrangements from the authorised third party brokers that they have procedures in place equal to the ones adopted and implemented by UBP. UBP also ensures the ongoing monitoring and oversight of these third party brokers.

UBP considers the following as the most important factors when selecting a third party broker:

1. Size, creditworthiness and reputation of the broker (company rating);
2. A well established reputation in relation to a particular market or industry sector;
3. Clearance and settlement capabilities (such as the ability to settle DVP);
4. Access to markets and distribution networks; and
5. Availability and effectiveness of algorithmic trading strategies (Note: this is only relevant when considering an electronic trading relationship)
6. This list shall be completed with qualitative factors such as clearing schemes, circuit breakers, scheduled actions, or any other relevant consideration, and the relative importance of each factor.

**(e) How order execution differs according to client categorisation, where the firm treats categories of clients differently and where it may affect the order execution arrangements**

UBP SA London Branch, Asset management only executes transactions on behalf of eligible counterparties or professional clients and those client categories are treated similarly as far as best execution is concerned.

**(f) Other criteria that 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**

UBP SA, London Branch does not execute orders on behalf of retail clients.

**(g) An explanation of how the investment firm has used any data or tools relating to the quality of execution, including any data published under Commission Delegated Regulation EU 2017/575**

For the year 2018, the Bank relied on the qualitative assessment made by its internal clients to assess best selection.

**(h) Where applicable, an explanation of how the investment firm has used output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU**

For the year 2018, the Bank used no data from consolidated tape providers established under Article 65 of Directive 2014/65/EU.

#### (ii) Money markets instruments

No trade

### (c) Interest rates derivatives

#### (i) Futures and options admitted to trading on a trading venue

**(a) Explanation of the relative importance the firm gave to the execution factors of price, costs, speed, likelihood of execution or any other consideration including qualitative factors when assessing the quality of execution**  
In order to assess best execution for interest rate derivatives, Compliance gathered the theoretical prices and the market prices where available using GIP and GPO Bloomberg functions, to compare them with actual trade prices. The maximum deviation allowed versus the theoretical price was set at 50 bps.

**(b) a description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders**  
UBP SA has no close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute interest rate derivatives.

**(c) a description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received**  
There are no specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received for the trading of interest rate derivatives.

**(d) an explanation of the factors that led to a change in the list of execution venues listed in the firm's execution policy, if such a change occurred**  
UBP has a detailed internal process for validating and modifying its authorised third party broker list. The UBP Bank and Broker Committee is responsible at Group level for validating and maintaining the authorised broker list. UBP will obtain assurance by means of execution arrangements from the authorised third party brokers that they have procedures in place equal to the ones adopted and implemented by UBP. UBP also ensures the ongoing monitoring and oversight of these third party brokers.  
UBP considers the following as the most important factors when selecting a third party broker:  
1. Size, creditworthiness and reputation of the broker (company rating);  
2. A well established reputation in relation to a particular market or industry sector;  
3. Clearance and settlement capabilities (such as the ability to settle DVP);  
4. Access to markets and distribution networks; and  
5. Availability and effectiveness of algorithmic trading strategies (Note: this is only relevant when considering an electronic trading relationship)  
6. This list shall be completed with qualitative factors such as clearing schemes, circuit breakers, scheduled actions, or any other relevant consideration, and the relative importance of each factor.

**(e) an explanation of how order execution differs according to client categorisation, where the firm treats categories of clients differently and where it may affect the order execution arrangements**  
The asset management business of UBP SA only executes transactions on behalf of eligible counterparties or professional clients and those client categories are treated similarly as far as best execution is concerned.

**(f) 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**  
The asset management business of UBP SA does not execute orders on behalf of retail clients.

**(g) an explanation of how the investment firm has used any data or tools relating to the quality of execution, including any data published under Commission Delegated Regulation EU 2017/575**  
For the year 2018, the Bank relied on the qualitative assessment made by its internal clients to assess best selection.

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(ii) Swaps, forwards, and other interest rates derivatives

No trade

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**(d) Credit derivatives**

(i) Futures and options admitted to trading on a trading venue

No trade

(ii) Other credit derivatives

No trade

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**(e) Currency derivatives****(a) Explanation of the relative importance the firm gave to the execution factors of price, costs, speed, likelihood of execution or any other consideration including qualitative factors when assessing the quality of execution**

In order to assess best execution for swaps, forwards and other currency derivatives, Compliance gathered the theoretical prices and the market prices where available using GIP and GPO Bloomberg functions, to compare them with actual trade prices. The maximum deviation allowed versus the theoretical price was set at 50 bps.

**(b) a description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders**

UBP SA has no close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute swaps, forwards and other currency derivatives.

**(c) a description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received**

There are no specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received for the trading of swaps, forwards and other currency derivatives.

**(d) an explanation of the factors that led to a change in the list of execution venues listed in the firm's execution policy, if such a change occurred**

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**(f) Structured finance instruments**

No trade

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**(g) Equity derivatives**

(i) Options and Futures admitted to trading on a trading venue

No trade

(ii) Swaps and other equity derivatives

No trade

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**(h) Securitised derivatives**

(i) Warrants and Certificate Derivatives

No trade

(ii) Other securitised derivatives

No trade

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**(i) Commodities derivatives and emission allowances Derivatives**

(i) Options and Futures admitted to trading on a trading venue

No trade

(ii) Other commodities derivatives and emission allowances derivatives

No trade

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**(j) Contracts for difference**

No trade

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**(k) Exchange traded products (Exchange traded funds, exchange traded notes and exchange traded commodities)**

No trade

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**(l) Emission allowances**

No trade

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**(m) Other instruments**

No trade