

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

Union Bancaire Privée, UBP SA, London Branch, Asset Management division

2019

Top execution venues**(a) Equities – Shares & Depository Receipts** **More than 1 average trade per business day in the previous year**

(iii) No Tick size liquidity bands Available - Traded via brokers

Top execution brokers	Proportion of total volume traded	Proportion of total executed orders	LEI
Tourmaline	17.11%	8.52%	213800MWJ1TXNQIF5J22
UBS Limited Programme	16.33%	29.54%	BFM8T61CT2L1QCCEMIK50
Redburn (Europe) Limited	13.65%	8.38%	213800PKEJQZQXQCOJ04
Exane Equity Algos	11.66%	6.94%	213800SH9MTNZQJKP526
ITG Europe, London	11.31%	10.83%	213800EEC95PRUCEUP63

(b) Debt instruments**(i) Bonds** **Average volume** **More than 1 average trade per business day in the previous year**

Traded via brokers

Top execution brokers	Proportion of total volume traded	Proportion of total executed orders	LEI
Citigroup Global Markets Ltd	18.01%	10.83%	XKZZ2JZF41MRHTR1V493
Jefferies International Limited	11.98%	16.56%	S5THZMDUJCTQZBTRV198
Barclays Capital	9.71%	11.15%	G5GSEF7VJP5I7OUK5573
HSBC Bank plc, London	9.26%	7.01%	MP6ISZYZBEU3UXPYFY54
J.P. Morgan Securities PLC	7.53%	1.91%	K6Q0W1PS1L104IQL9C32

Traded on venue directly

No trade

Traded on MTFs

Top execution venues	Proportion of total volume traded	Proportion of total executed orders	LEI
MarketAxess London	100.00%	100.00%	549300TTHIODYMGND828

(ii) Money markets instruments - Traded via brokers

No trade

(c) Interest rates derivatives

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

No trade

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

No trade

(d) Credit derivatives

(i) Futures and options admitted to trading on a trading venue - Traded via brokers

Average volume **Less than 1 average trade per business day in the previous year**

Top execution brokers	Proportion of total volume traded	Proportion of total executed orders	LEI
Morgan Stanley & Co. International PLC	100.00%	100.00%	4PQUHN3JPF6FNF3BB653

(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 brokers	Proportion of total volume traded	Proportion of total executed orders	LEI
Union Bancaire Privée (Europe) S.A.	100.00%	100.00%	5493003RJ3TPV33W0108

(f) Structured finance instruments

No trade

(g) Equity derivatives

No trade

(h) Securitized derivatives

No trade

(ii) Other securitized derivatives

No trade

(i) Commodities derivatives and emission allowances Derivatives

(i) Options and Futures admitted to trading on a trading venue - Traded via brokers

No trade

(ii) Other commodities derivatives and emission allowances derivatives

No trade

(j) Contracts for difference

No trade

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

Traded via brokers

No trade

Traded on venue directly

No trade

(l) Emission allowances

No trade

(m) Other instruments

No trade

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 1.22% 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 focuses on the price of execution for all of its clients, including retail clients.

(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

In specific situations other criteria can take precedence over price, such as the characteristics of the order (e.g., limit orders), volume, or the probability of settlement.

(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 (RTS27)

For the year 2019, 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 2019, the Bank used no data from consolidated tape providers established under Article 65 of Directive 2014/65/EU.

(b) Debt instruments

(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 whether three different prices were considered 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 conflicts of interests or common ownerships with respect to any execution venues used to execute fixed income 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 focuses on the price of execution for all of its clients, including retail clients.

(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

In specific situations other criteria can take precedence over price, such as volume or the probability of settlement (in case of illiquid instruments).

(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 2019, 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 2019, the Bank used no data from consolidated tape providers established under Article 65 of Directive 2014/65/EU.

(c) Interest rates derivatives

- | | |
|--|----------|
| (i) Futures and options admitted to trading on a trading venue | No trade |
| (ii) Swaps, forwards, and other interest rates derivatives | No trade |

(d) Credit derivatives**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**

UBP decided to allocate all its transactions on exchange traded credit derivatives to UBS as of December 2018, based on the quality of its operational set-up. The first criteria to assess best execution remains price as UBS gives UBP an access to all the quotes available on the market and the bank selects the best price available.

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

UBP SA has no closed links, conflict of interests or common ownerships with respect to any execution venues used to execute credit derivatives.

(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 credit derivatives.

(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 decided to allocate all its transactions on exchange traded credit derivatives to UBS acting both as executing and clearing broker as of December 2018, based on the quality of its operational set-up.

(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 focuses on the price of execution for all of his clients, including retail clients.

(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

Price availability and operational risk were the two factors used to select executing brokers enabling the Bank to deal in listed credit derivatives.

(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 2019, 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 2019, the Bank used no data from consolidated tape providers established under Article 65 of Directive 2014/65/EU.

(e) Currency derivatives

(i) Futures and options admitted to trading on a trading venue No trade

(ii) Swaps, forwards, and other currency derivatives

(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 swaps and forwards, UBP sought primarily to minimize operational risk in order execution. Specific controls will be put in place in 2020 to ensure that those OTC transactions are executed at a fair market price.

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

UBP SA is facing its clients for all swap and forward transactions (no execution venue involved)

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

Not relevant as there are no execution venues involved for those transactions

(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

There were no changes in the list of brokers used to execute currency derivative transactions in 2019.

(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

Order execution does not differ according to client categorization.

(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 sought primarily to minimize operational risk in order execution for swaps and forwards. Specific controls will be put in place in 2020 to ensure that those OTC transactions are executed at a fair market price.

(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 2019, 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 2019, the Bank used no data from consolidated tape providers established under Article 65 of Directive 2014/65/EU.

(f) Structured finance instruments

No trade

(g) Equity derivatives

No trade

(h) Securitised derivatives

No trade

(i) Commodities derivatives and emission allowances Derivatives

No trade

(j) Contracts for difference

No trade

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

No trade

(l) Emission allowances

No trade

(m) Other instruments

No trade