

RTS 28 - BEST EXECUTION REPORT 2019

TSAF OTC



TSAF OTC

9 Place Vendôme

75001 - Paris

INTRODUCTION

Pursuant to Article 24 of Directive 2014/65/ EU of May 15, 2014 ("MIFID 2") and art. 64 to 66 of the Delegated Regulation 2017/565, when providing reception and transmission of orders and/or execution in relation with financial instruments (as defined in Appendix I. Section C of the MiFID 2), TSAF OTC shall take all sufficient steps to achieve the best possible result for its clients.

Supplementing MIFID 2, the Commission delegated regulation (EU) 2017/576 of 8 June 2016 imposes the publication of the top five execution venues in term of trading volumes for professional clients and for all the class of financial instruments defined on its Annex I. As investment firms, TSAF OTC publishes this report on an annual basis.

Execution policy is available on the Tradition Paris's website: <http://www.tsaf-paris.com/mif.php>

(A) EQUITIES — SHARES & DEPOSITARY RECEIPTS : N/A

(B) DEBT INSTRUMENTS

- INFORMATION ON THE TOP FIVE EXECUTION VENUES

(i) Bonds

Class of Instrument	Debt (i) Bonds				
Notification if < 1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
TSAF OTC as other liquidity provider	98%	98%	-	-	-
Bloomberg Trading Facility Limited - BMTF	2%	2%	-	-	-

TSAF OTC will not provide split for passive, aggressive and directed order due to the lack of data available.

(ii) Money markets instruments

Class of Instrument	Debt (ii) Money market instrument				
Notification if < 1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
TSAF OTC as other liquidity provider	100%	100%	-	-	-

TSAF OTC will not provide split for passive, aggressive and directed order due to the unavailability of the data.

- QUALITY OF EXECUTION OBTAINED

(a) An 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;

1. Size
2. Likelihood of execution
3. Price
4. Speed of processing
5. Costs
6. Nature
7. Any other key consideration in the execution of a particular order

There may be scenarios where the priority of execution will change, for example:

- due to a lack of liquidity
- depending on whether the instrument is liquid or not
- if the order is executed on a trading platform or OTC

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

There are no close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders.

(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.

(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;

There are no change in the list of execution venues listed in the firm's execution policy for transactions executed in 2019.

(e) An explanation of how order execution differs according to client categorization, 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. TSAF OTC treats only with Eligible Counterparties and Professional clients.

(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;

TSAF OTC does not provide any investment services to 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 to be inserted before publication.

Data relating to the quality of execution is used for performing monitoring and controls over the execution activity.

(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.

TSAF OTC did not use output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU.

(C) INTEREST RATES DERIVATIVES: N/A

(D) CREDIT DERIVATIVES: N/A

(E) CURRENCY DERIVATIVES: N/A

(F) STRUCTURED FINANCE INSTRUMENTS: N/A

(G) EQUITY DERIVATIVES: N/A

(H) SECURITIZED DERIVATIVES

- **INFORMATION ON THE TOP FIVE EXECUTION VENUES**

(i) Warrants Certificate Derivatives: N/A

(ii) Other securitized derivatives

Class of Instrument	Securitized derivatives (ii) other securitized derivatives				
Notification if < 1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
TSAF OTC as other liquidity provider	100%	100%	-	-	-

TSAF OTC will not provide split for passive, aggressive and directed order due to the unavailability of the data.

- **QUALITY OF EXECUTION OBTAINED**

(a) An 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;

- 1) Price
- 2) Total cost

The transaction is carried out with the Producer offering the best price in response to the customer's request for the characteristics of the product given by the customer, excluding specific instructions (per maximum exposure reached on a Producer)

A description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders;

There are no close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders.

(b) 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.

(c) 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;

There are no change in the list of execution venues listed in the firm's execution policy for transactions executed in 2019.

(d) An explanation of how order execution differs according to client categorization, 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. TSAF OTC treats only with Eligible Counterparties and Professional clients.

(e) 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;

TSAF OTC does not provide any investment services to retail clients.

(f) 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 to be inserted before publication.

Data relating to the quality of execution is used for performing monitoring and controls over the execution activity.

(g) 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.

TSAF OTC did not use output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU.

(I) COMMODITIES DERIVATIVES AND EMISSION ALLOWANCES DERIVATIVES: N/A

(J) CONTRACTS FOR DIFFERENCE: N/A

(K) EXCHANGE TRADED PRODUCTS: N/A

(L) EMISSION ALLOWANCES: N/A

(M) OTHER INSTRUMENTS: N/A