

# RTS 28 – BEST EXECUTION REPORT 2019

## TRADITION SECURITIES & FUTURES



Tradition Securities & Futures

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), Tradition Securities & Futures 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, Tradition Securities & Futures publishes this report on an annual basis.

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

-----

## CONTENTS

<b>(A) EQUITIES — SHARES &amp; DEPOSITARY RECEIPTS</b> .....	3
<b>§ 1 : TOP FIVE EXECUTING BROKERS (RECEPTION AND TRANSMISSION OF ORDERS)</b> .....	3
<b>§ 2 : TOP FIVE EXECUTING VENUES (EXECUTION OF ORDERS)</b> .....	5
<b>(B) DEBT INSTRUMENTS</b> .....	7
<b>§ 1: TOP FIVE EXECUTING BROKERS (RECEPTION AND TRANSMISSION OF ORDERS)</b> .....	7
<b>§ 2: TOP FIVE EXECUTING VENUES (EXECUTION OF ORDERS)</b> .....	8
<b>(C) INTEREST RATES DERIVATIVES</b> .....	10
<b>(D) CREDIT DERIVATIVES: N/A</b> .....	11
<b>(E) CURRENCY DERIVATIVES</b> .....	11
<b>(F) STRUCTURED FINANCE INSTRUMENT: N/A</b> .....	13
<b>(G) EQUITY DERIVATIVES</b> .....	13
<b>(H) SECURITIZED DERIVATIVES</b> .....	14
<b>(I) COMMODITIES DERIVATIVES AND EMISSION ALLOWANCES DERIVATIVES: N/A</b> .....	17
<b>(J) CONTRACTS FOR DIFFERENCE: N/A</b> .....	17
<b>(K) EXCHANGE TRADED PRODUCTS (EXCHANGE TRADED FUNDS, EXCHANGE TRADED NOTES AND EXCHANGE TRADED COMMODITIES)</b> .....	17
<b>§ 1 : TOP FIVE EXECUTING BROKERS (RECEPTION AND TRANSMISSION OF ORDERS)</b> .....	17
<b>§ 2: TOP FIVE EXECUTING VENUES (EXECUTION OF ORDERS)</b> .....	18
<b>(L) EMISSION ALLOWANCES: N/A</b> .....	20
<b>(M) OTHER INSTRUMENTS: N/A</b> .....	20



## (A) EQUITIES — SHARES & DEPOSITARY RECEIPTS

### § 1 : TOP FIVE EXECUTING BROKERS (RECEPTION AND TRANSMISSION OF ORDERS)

- INFORMATION ON THE TOP FIVE EXECUTING BROKERS

#### (i) Tick size liquidity bands 5 & 6 (from 2 000 trades per day)

Class of Instrument	Equities — Shares & Depositary Receipts - (i) Tick size liquidity bands 5 & 6 (from 2 000 trades per day)				
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
Barclays Bank PLC G5GSEF7VJPSI7OUK5573	73.5%	82.6%	-	-	-
Goldman Sachs International W22LROWP2IHZNBB6K528	19.3%	12.0%	-	-	-
TFS Derivatives Limited 549300WXUYR1CMLDQF25	4.6%	0.1%	-	-	-
* 01/01/2019 to 12/11/2019 KCG Europe Limited - 549300346EFUPFCXJT79 * 12/12/2019 to 31/12/2019 Virtu ITG Europe Limited - 213800EEC95PRUCEUP63	1.8%	5.0%	-	-	-
Skandinaviska Enskilda Banken AB F3JS33DEI6XQ4ZBPTN86	0.7%	0.4%	-	-	-

Tradition Securities & Futures will not provide split for passive, aggressive and directed order due to the lack of data available.

#### (ii) Tick size liquidity bands 3 & 4 (from 80 to 1 999 trades per day)

Class of Instrument	Equities — Shares & Depositary Receipts - (ii) Tick size liquidity bands 3 & 4 (from 80 to 1 999 trades per day)				
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
Barclays Bank PLC G5GSEF7VJPSI7OUK5573	55.5%	69.2%	-	-	-
* 01/01/2019 to 12/11/2019 KCG Europe Limited - 549300346EFUPFCXJT79 * 12/12/2019 to 31/12/2019 Virtu ITG Europe Limited - 213800EEC95PRUCEUP63	34.7%	25.5%	-	-	-
TFS Derivatives Limited 549300WXUYR1CMLDQF25	9.0%	3.5%	-	-	-
Goldman Sachs International W22LROWP2IHZNBB6K528	0.9%	1.9%	-	-	-

Tradition Securities & Futures will not provide split for passive, aggressive and directed order due to the lack of data available.

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



Class of Instrument	Equities — Shares & Depository Receipts - (iii) Tick size liquidity band 1 and 2 (from 0 to 79 trades per day)				
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
TFS Derivatives Limited 549300WXUYR1CMLDQF25	53.6%	5.7%	-	-	-
Cowen Execution Services Limited 213800SS94VGJTFLIG64	22.6%	0.3%	-	-	-
* 01/01/2019 to 12/11/2019 KCG Europe Limited - 549300346EFUPFCXJT79 * 12/12/2019 to 31/12/2019 Virtu ITG Europe Limited - 213800EEC95PRUCEUP63	12.9%	39.3%	-	-	-
Barclays Bank PLC G5GSEF7VJPS17OUK5573	7.6%	46.1%	-	-	-
Goldman Sachs International W22LROWP2IHZNBB6K528	3.3%	8.5%	-	-	-

Tradition Securities & Futures will not provide split for passive, aggressive and directed order due to the lack of data available.

- **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;**

As part of its best execution obligation, Tradition Securities & Futures may choose to direct a Client's order to another Investment Service Provider ("External Broker") for execution. Tradition Securities & Futures has established a list of External Brokers for order execution and these External Brokers have been selected based on the following criteria:

1. Compliance history of the External Broker
2. State of the art technology implemented by the External Broker
3. Market access provided by the External Broker
4. Cost and charges of the External Broker
5. Coherence with Tradition Paris Execution Policy of the External Broker

**(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. Tradition Securities & Futures 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;**

Tradition Securities & Futures 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.**

Tradition Securities & Futures did not use output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU.

## § 2 : TOP FIVE EXECUTING VENUES (EXECUTION OF ORDERS)

### • INFORMATION ON THE TOP FIVE EXECUTING VENUES

#### (i) Tick size liquidity bands 5 & 6 (from 2 000 trades per day)

Class of Instrument	(a) Equities — Shares & Depositary Receipts - (i) Tick size liquidity bands 5 & 6 (from 2 000 trades per day)				
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
<b>Euronext - Euronext Paris - XPAR</b>	<b>100%</b>	<b>100%</b>	-	-	-

*Tradition Securities & Futures will not provide split for passive, aggressive and directed order due to the lack of data available.*

#### (ii) Tick size liquidity bands 3 & 4 (from 80 to 1 999 trades per day)

Class of Instrument	(a) Equities — Shares & Depositary Receipts - (ii) Tick size liquidity bands 3 & 4 (from 80 to 1 999 trades per day)				
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
<b>Euronext - Euronext Paris - XPAR</b>	<b>70%</b>	<b>93%</b>	-	-	-
<b>Bloomberg Trading Facility Limited - BMTF</b>	<b>30%</b>	<b>7%</b>	-	-	-

*Tradition Securities & Futures will not provide split for passive, aggressive and directed order due to the lack of data available.*

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

Class of Instrument	<b>(a) Equities – Shares &amp; Depository Receipts - (iii) Tick size liquidity band 1 and 2 (from 0 to 79 trades per day)</b>				
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
<b>Euronext - Euronext Paris - XPAR</b>	<b>99%</b>	<b>99%</b>	-	-	-
<b>Bloomberg Trading Facility Limited - BMTF</b>	<b>1%</b>	<b>1%</b>	-	-	-

*Tradition Securities & Futures will not provide split for passive, aggressive and directed order due to the lack of data available.*

- **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. Likelihood of execution
3. Speed of processing
4. Costs
5. Size
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 on a particular venue or across venue where likelihood of execution and speed of processing will become more important;
- when the order is received during the day and/or the size of order may affect the significance of speed and likelihood of execution.

**(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. Tradition Securities & Futures 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;**

Tradition Securities & Futures 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.**

Tradition Securities & Futures did not use output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU.

## **(B) DEBT INSTRUMENTS**

### **§ 1: TOP FIVE EXECUTING BROKERS (RECEPTION AND TRANSMISSION OF ORDERS)**

- INFORMATION ON THE TOP FIVE EXECUTING BROKERS**

**(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
<b>BANCA IMI S.P.A. - QV4Q8OGJ7OA6PA8SCM14</b>	<b>100%</b>	<b>100%</b>	-	-	-

*Tradition Securities & Futures will not provide split for passive, aggressive and directed order due to the lack of data available.*

**(ii) Money markets instruments : N/A**

- QUALITY OF EXECUTION OBTAINED**

As part of its best execution obligation, Tradition Securities & Futures may choose to direct a Client's order to another Investment Service Provider ("External Broker") for execution. Tradition Securities & Futures has established a list of External Brokers for order execution and these External Brokers have been selected based on the following criteria:

1. Compliance history of the External Broker
2. State of the art technology implemented by the External Broker
3. Market access provided by the External Broker
4. Cost and charges of the External Broker
5. Coherence with Tradition Paris Execution Policy of the External Broker

**(a) 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. Tradition Securities & Futures 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;**

Tradition Securities & Futures 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.**

Tradition Securities & Futures did not use output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU.

**§ 2: TOP FIVE EXECUTING VENUES (EXECUTION OF ORDERS)**

• **INFORMATION ON THE TOP FIVE EXECUTING VENUES**

**(i) Bonds**

Class of Instrument	<b>(i) Bonds</b>				
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
<b>Tradition Securities &amp; Futures as other liquidity provider</b>	<b>99.8%</b>	<b>91.0%</b>	-	-	-
<b>Euronext - Euronext Paris - XPAR</b>	<b>0.2%</b>	<b>9.0%</b>	-	-	-

*Tradition Securities & Futures will not provide split for passive, aggressive and directed order due to the lack of data available.*

**(ii) Money market instruments**



Class of Instrument	(ii) Money market instruments				
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
<b>Tradition Securities &amp; Futures as other liquidity provider</b>	100.0%	100.0%	-	-	-

Tradition Securities & Futures will not provide split for passive, aggressive and directed order due to the lack of data available.

- **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,
- whether an instrument is liquid or not ;
- whether the order is executed using an execution venue 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. Tradition Securities & Futures 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;**

Tradition Securities & Futures 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.**

Tradition Securities & Futures did not use output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU.

## **(C) INTEREST RATES DERIVATIVES**

- INFORMATION ON THE TOP FIVE EXECUTING VENUES**

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

Class of Instrument	Interest rates derivatives (i) Futures and options admitted to trading on a trading				
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
<b>EUREX DEUTSCHLAND - XEUR</b>	<b>58.5%</b>	<b>59.2%</b>	-	-	-
<b>CHICAGO BOARD OF TRADE - XCBT</b>	<b>19.5%</b>	<b>15.4%</b>	-	-	-
<b>CHICAGO MERCANTILE EXCHANGE - XCME</b>	<b>11.1%</b>	<b>1.6%</b>	-	-	-
<b>ICE Futures Europe - Financial Products Division - IFEU</b>	<b>10.9%</b>	<b>23.7%</b>	-	-	-

*Tradition Securities & Futures will not provide split for passive, aggressive and directed order due to the lack of data available.*

**(ii) Swaps, forwards, and other interest rates derivatives: N/A**

- 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. Speed of processing
3. Likelihood of execution
4. Size
5. Nature
6. Cost
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:

- where there is unusual levels of volatility, any of the factors may become of greater importance depending upon the circumstance;
- where the characteristics of each individual order such as client preferences, nature will be more significant;
- where there are unusual market conditions, speed and likelihood of execution will become more important;

where the order is received during the day and/or the size of order may affect the significance of speed and likelihood of execution

**(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. Tradition Securities & Futures 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;**

Tradition Securities & Futures 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.**

Tradition Securities & Futures did not use output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU.

**(D) CREDIT DERIVATIVES: N/A**

**(E) CURRENCY DERIVATIVES**

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

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

Class of Instrument	Currency derivatives (i) Futures and options admitted to trading on a trading venue				
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
CHICAGO MERCANTILE EXCHANGE - XCME	100.0%	100.0%	-	-	-

Tradition Securities & Futures will not provide split for passive, aggressive and directed order due to the lack of data available.

(ii) Swaps, forwards, and other currency derivatives: N/A

• 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. Likelihood of execution
3. Size
4. Speed of processing
5. Cost
6. Nature
7. Any other consideration related to the execution of the order

There may be scenarios where the priority of execution will change, for example, where there is unusual levels of volatility, any of the factors may become of greater importance depending upon the circumstance.

(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. Tradition Securities & Futures 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;**

Tradition Securities & Futures 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.**

Tradition Securities & Futures did not use output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU.

## **(F) STRUCTURED FINANCE INSTRUMENT: N/A**

## **(G) EQUITY DERIVATIVES**

- INFORMATION ON THE TOP FIVE EXECUTING VENUES**

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

Class of Instrument	Equity derivatives i) Futures and options admitted to trading on a trading venue				
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
ICE Futures Europe - Financial Products Division - IFEU	45.9%	62.0%	-	-	-
EUREX DEUTSCHLAND - XEUR	19.9%	4.6%	-	-	-
CHICAGO MERCANTILE EXCHANGE - XCME	19.6%	6.3%	-	-	-
EURONEXT PARIS MONEP - XPAR	14.5%	27.0%	-	-	-
ICE Futures Europe - Equity Products Division - IFEU	0.1%	0.1%	-	-	-

*Tradition Securities & Futures will not provide split for passive, aggressive and directed order due to the lack of data available.*

**(ii) Swaps and equity derivatives: N/A**

- 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. Speed of processing
3. Likelihood of execution
4. Size
5. Nature
6. Cost
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:

- where there is unusual levels of volatility, any of the factors may become of greater importance depending upon the circumstance;
  - where the characteristics of each individual order such as client preferences, nature will be more significant;
  - where there are unusual market conditions, speed and likelihood of execution will become more important;
- where the order is received during the day and/or the size of order may affect the significance of speed and likelihood of execution

**(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. Tradition Securities & Futures 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;**

Tradition Securities & Futures 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.**

Tradition Securities & Futures did not use output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU.

## **(H) SECURITIZED DERIVATIVES**

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

**(i) Warrants and Certificate Derivatives**



Class of Instrument	Securitized derivatives (i) Warrants and Certificate 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
Bloomberg Trading Facility Limited - BMTF	100%	100%	-	-	-

Tradition Securities & Futures will not provide split for passive, aggressive and directed order due to the lack of data available.

- **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. Likelihood of execution
3. Size
4. Speed of processing
5. Cost
6. Nature
7. Any other consideration related to the execution of the order

There may be scenarios where the priority of execution will change, for example, where there is unusual levels of volatility, any of the factors may become of greater importance depending upon the circumstance.

**(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. Tradition Securities & Futures 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;**

Tradition Securities & Futures 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.**

Tradition Securities & Futures did not use output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU.

**(ii) Other securitized derivatives**

Class of Instrument	Securitized derivatives (i) Others 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
<b>Tradition Securities &amp; Futures as other liquidity provider</b>	<b>100%</b>	<b>100%</b>	-	-	-

*Tradition Securities & Futures will not provide split for passive, aggressive and directed order due to the lack of data available.*

**• 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 done with the Issuer providing the best price as to the RFQ sent following the characteristics required by the client, taking into account any Specific Instructions (e.g. max exposure on an Issuer)

**(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. Tradition Securities & Futures 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;***

Tradition Securities & Futures 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.***

Tradition Securities & Futures 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 (EXCHANGE TRADED FUNDS, EXCHANGE TRADED NOTES AND EXCHANGE TRADED COMMODITIES)**

**§ 1 : TOP FIVE EXECUTING BROKERS (RECEPTION AND TRANSMISSION OF ORDERS)**

• **INFORMATION ON THE TOP FIVE EXECUTING BROKERS**

Class of Instrument	k. Exchange traded products (Exchange traded funds, exchange traded notes and exchange traded commodities)				
Notification if < 1 average trade per business day in the previous year	Y/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
Barclays Bank PLC -G5GSEF7VJPSI7OUK5573 * 01/01/2019 to 12/11/2019	57.24%	50.57%	-	-	-
KCG Europe Limited - 549300346EFUPFCXJT79 * 12/12/2019 to 31/12/2019	26.58%	39.53%	-	-	-
Virtu ITG Europe Limited - 213800EEC95PRUCEUP63					
TFS Derivatives Limited - 549300WXUYR1CMLDQF25	12.05%	7.02%	-	-	-
Goldman Sachs International - 22LROWP2IHZNBB6K528	4.08%	6.32%	-	-	-
Cowen Execution Services Limited - 213800SS94VGJTFLIG64	0.06%	0.03%	-	-	-

Tradition Securities & Futures will not provide split for passive, aggressive and directed order due to the lack of data available.

***(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;***

As part of its best execution obligation, Tradition Securities & Futures may choose to direct a Client's order to another Investment Service Provider ("External Broker") for execution. Tradition Securities &



Futures has established a list of External Brokers for order execution and these External Brokers have been selected based on the following criteria:

1. Compliance history of the External Broker
2. State of the art technology implemented by the External Broker
3. Market access provided by the External Broker
4. Cost and charges of the External Broker
5. Coherence with Tradition Paris Execution Policy of the External Broker

**(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. Tradition Securities & Futures 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;**

Tradition Securities & Futures 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.**

Tradition Securities & Futures did not use output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU.

## § 2: TOP FIVE EXECUTING VENUES (EXECUTION OF ORDERS)

- INFORMATION ON THE TOP FIVE EXECUTING VENUES

Class of Instrument	k. Exchange traded products (Exchange traded funds, exchange traded notes and exchange traded commodities)				
Notification if < 1 average trade per business day in the previous year	Y/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
Bloomberg Trading Facility Limited - BMTF	99%	99%	-	-	-
Euronext - Euronext Paris - XPAR	<1%	<1%	-	-	-

Tradition Securities & Futures will not provide split for passive, aggressive and directed order due to the lack of data available.

- **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. Likelihood of execution
3. Speed of processing
4. Costs
5. Size
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 on a particular venue or across venue where likelihood of execution and speed of processing will become more important;
- when the order is received during the day and/or the size of order may affect the significance of speed and likelihood of execution.

**(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. Tradition Securities & Futures 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;**



Tradition Securities & Futures 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.***

Tradition Securities & Futures did not use output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU.

**(L) EMISSION ALLOWANCES: N/A**

**(M) OTHER INSTRUMENTS: N/A**