

# SAXO BANK A/S

MiFID II RTS 28 – Annual Best Execution Disclosure 2018  
Top 5 Brokers and Top 5 Venues  
Quality of Execution Statement



## RECEPTION AND TRANSMISSION OF ORDERS TOP 5 BROKERS - RETAIL CLIENTS

Class of Instrument	Equities – Shares & Depository Receipts - Tick size liquidity bands 5 and 6				
Notification if <1 average trade per business day in the previous year	N				
Top five execution brokers 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
Morgan Stanley & Co. International PLC - 4PQUHN3JPF GFNF3BB653	65.2%	71.3%	35.0%	65.0%	0.0%
Instinet Europe Limited - 213800MXAKR2LA1VBM44	20.9%	20.4%	21.1%	78.9%	0.0%
BNP Paribas - R0MUWSFPU8MPRO8K5P83	11.1%	6.0%	70.9%	29.1%	0.0%
Banco LJ Carregosa SA - 213800UFLAA5SS55IZ10	2.4%	2.0%	78.5%	21.5%	0.0%
Banco Espírito Santo, S.A. - UBGVXZLX4SCS302CM391	0.5%	0.3%	77.5%	22.5%	0.0%
Class of Instrument	Equities – Shares & Depository Receipts - Tick size liquidity bands 3 and 4				
Notification if <1 average trade per business day in the previous year	N				
Top five execution brokers 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
Morgan Stanley & Co. International PLC - 4PQUHN3JPF GFNF3BB653	69.8%	67.7%	40.0%	60.0%	0.0%
Instinet Europe Limited - 213800MXAKR2LA1VBM44	19.5%	23.5%	36.7%	63.3%	0.0%
Banco LJ Carregosa SA - 213800UFLAA5SS55IZ10	5.5%	4.7%	87.2%	12.8%	0.0%
BNP Paribas - R0MUWSFPU8MPRO8K5P83	4.1%	3.5%	70.7%	29.3%	0.0%
Banco Espírito Santo, S.A. - UBGVXZLX4SCS302CM391	1.2%	0.7%	68.2%	31.8%	0.0%
Class of Instrument	Equities – Shares & Depository Receipts - Tick size liquidity bands 1 and 2				
Notification if <1 average trade per business day in the previous year	N				
Top five execution brokers 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
Morgan Stanley & Co. International PLC - 4PQUHN3JPF GFNF3BB653	76.0%	69.9%	41.1%	58.9%	0.0%
Instinet Europe Limited - 213800MXAKR2LA1VBM44	12.5%	19.1%	38.9%	61.1%	0.0%
Banco LJ Carregosa SA - 213800UFLAA5SS55IZ10	4.8%	6.0%	92.5%	7.5%	0.0%
BNP Paribas - R0MUWSFPU8MPRO8K5P83	4.1%	3.9%	74.8%	25.2%	0.0%
Banco Espírito Santo, S.A. - UBGVXZLX4SCS302CM391	2.5%	1.0%	94.1%	5.9%	0.0%

## RECEPTION AND TRANSMISSION OF ORDERS TOP 5 BROKERS - RETAIL CLIENTS

Class of Instrument	Interest rates derivatives - 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 brokers 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
Morgan Stanley & Co LLC - 9R7GPTSO7KV3UQJZQ078	59.8%	65.0%	74.3%	25.7%	0.0%
Morgan Stanley & Co. International PLC - 4PQUHN3JPFGFNF3BB653	25.9%	31.6%	66.7%	33.3%	0.0%
JP Morgan Securities PLC - K6Q0W1PS1L1O4IQL9C32	14.3%	3.4%	20.3%	79.7%	0.0%
Class of Instrument	Currency derivatives - 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 brokers 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
Morgan Stanley & Co LLC - 9R7GPTSO7KV3UQJZQ078	99.8%	99.7%	72.1%	27.9%	0.0%
Morgan Stanley & Co. International PLC - 4PQUHN3JPFGFNF3BB653	0.1%	0.2%	36.7%	63.3%	0.0%
JP Morgan Securities PLC - K6Q0W1PS1L1O4IQL9C32	0.02%	0.03%	7.1%	92.9%	0.0%
JP Morgan Securities LLC - ZBUT11V806EZRVWT807	0.01%	0.02%	50.0%	50.0%	0.0%
Class of Instrument	Equity Derivatives - Options and Futures admitted to trading on a trading venue				
Notification if <1 average trade per business day in the previous year	N				
Top five execution brokers 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
Morgan Stanley & Co LLC - 9R7GPTSO7KV3UQJZQ078	58.0%	32.5%	59.8%	40.2%	0.0%
JP Morgan Securities LLC - ZBUT11V806EZRVWT807	21.5%	10.2%	29.9%	70.1%	0.0%
JP Morgan Securities PLC - K6Q0W1PS1L1O4IQL9C32	12.5%	6.6%	70.5%	29.5%	0.0%
Morgan Stanley & Co. International PLC - 4PQUHN3JPFGFNF3BB653	8.0%	50.6%	92.4%	7.6%	0.0%
Nomura International PLC - DGQCSV2PHVF7I2743539	0.0000003%	0.0001%	100.0%	0.0%	0.0%

## RECEPTION AND TRANSMISSION OF ORDERS TOP 5 BROKERS - RETAIL CLIENTS

Class of Instrument	Securitised Derivatives - Warrants and Certificate Derivatives				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution brokers 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
Instinet Europe Limited - 213800MXAKR2LA1VBM44	79.7%	60.2%	29.0%	71.0%	0.0%
Citadel Securities LLC - 12UUJYTN7D35W8KCSG25	11.7%	16.5%	5.9%	94.1%	0.0%
Morgan Stanley & Co. International PLC - 4PQUHN3JPFQFNF3BB653	5.4%	14.6%	0.0%	100.0%	0.0%
Banco LJ Carregosa SA - 213800UFLAA5SS55IZ10	2.7%	3.9%	100.0%	0.0%	0.0%
Instinet LLC - 549300MGMN3RKMU8FT57	0.01%	1.94%	0.0%	100.0%	0.0%
Class of Instrument	Commodities derivatives and emission allowances Derivatives - Options and Futures admitted to trading on a trading venue				
Notification if <1 average trade per business day in the previous year	N				
Top five execution brokers 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
Morgan Stanley & Co LLC - 9R7GPTSO7KV3UQJZQ078	77.4%	79.6%	61.1%	38.9%	0.0%
JP Morgan Securities PLC - K6Q0W1PS1L1O4IQL9C32	21.9%	18.9%	32.4%	67.6%	0.0%
Morgan Stanley & Co. International PLC - 4PQUHN3JPFQFNF3BB653	0.6%	1.4%	71.8%	28.2%	0.0%
JP Morgan Securities LLC - ZBUT11V806EZRVWT807	0.0%	0.0%	100.0%	0.0%	0.0%
Class of Instrument	Contracts for difference				
Notification if <1 average trade per business day in the previous year	N				
Top five execution brokers 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
Instinet LLC - 549300MGMN3RKMU8FT57	62.1%	44.1%	51.5%	48.5%	0.0%
JP Morgan Securities PLC - K6Q0W1PS1L1O4IQL9C32	24.8%	29.3%	21.8%	78.2%	0.0%
Morgan Stanley & Co. International PLC - 4PQUHN3JPFQFNF3BB653	7.8%	14.8%	35.8%	64.2%	0.0%
Instinet Europe Limited - 213800MXAKR2LA1VBM44	3.6%	5.3%	40.3%	59.7%	0.0%
UBS Securities - BFM8T61CT2L1QCEMIK50	1.05%	4.15%	48.0%	52.0%	0.0%

## RECEPTION AND TRANSMISSION OF ORDERS TOP 5 BROKERS - RETAIL CLIENTS

Class of Instrument	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	N				
Top five execution brokers 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
Morgan Stanley & Co. International PLC - 4PQUHN3JPFQFNF3BB653	44.8%	41.2%	18.6%	81.4%	0.0%
Citadel Securities LLC - 12UUJYTN7D3SW8KCSG25	39.7%	41.8%	42.4%	57.6%	0.0%
Instinet Europe Limited - 213800MXAKR2LA1VBM44	6.8%	5.6%	33.2%	66.8%	0.0%
Instinet LLC - 549300MGMN3RKMU8FT57	5.7%	7.7%	79.1%	20.9%	0.0%
FirstRand Bank Limited - ZAYQDKTCATIXF9OQY690	2.02%	3.11%	26.3%	73.7%	0.0%
Class of Instrument	Other instruments				
Notification if <1 average trade per business day in the previous year	N				
Top five execution brokers 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
Citadel Securities LLC - 12UUJYTN7D3SW8KCSG25	68.3%	51.9%	38.6%	61.4%	0.0%
Instinet LLC - 549300MGMN3RKMU8FT57	11.5%	19.4%	61.0%	39.0%	0.0%
Instinet Europe Limited - 213800MXAKR2LA1VBM44	9.9%	13.9%	55.4%	44.6%	0.0%
Morgan Stanley & Co. International PLC - 4PQUHN3JPFQFNF3BB653	5.7%	5.9%	38.1%	61.9%	0.0%
FirstRand Bank Limited - ZAYQDKTCATIXF9OQY690	3.90%	8.14%	24.3%	75.7%	0.0%

## RECEPTION AND TRANSMISSION OF ORDERS TOP 5 BROKERS - PROFESSIONAL CLIENTS

Class of Instrument		Equities – Shares & Depository Receipts - Tick size liquidity bands 5 and 6				
Notification if <1 average trade per business day in the previous year		N				
Top five execution brokers 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	
Morgan Stanley & Co. International PLC - 4PQUHN3JPFQFNF3BB653	78.2%	81.7%	26.5%	73.5%	0.0%	
Instinet Europe Limited - 213800MXAKR2LA1VBM44	21.8%	18.2%	24.8%	75.2%	0.0%	
Banco LJ Carregosa SA - 213800UFLAA5SS55IZ10	0.05%	0.1%	100.0%	0.0%	0.0%	
Banco Espírito Santo, S.A. - UBGVXZLX4SCS302CM391	0.03%	0.03%	0.0%	100.0%	0.0%	
Class of Instrument		Equities – Shares & Depository Receipts - Tick size liquidity bands 3 and 4				
Notification if <1 average trade per business day in the previous year		N				
Top five execution brokers 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	
Morgan Stanley & Co. International PLC - 4PQUHN3JPFQFNF3BB653	73.6%	73.3%	41.0%	59.0%	0.0%	
Instinet Europe Limited - 213800MXAKR2LA1VBM44	26.1%	26.5%	39.4%	60.6%	0.0%	
Banco LJ Carregosa SA - 213800UFLAA5SS55IZ10	0.3%	0.2%	84.0%	16.0%	0.0%	
Class of Instrument		Equities – Shares & Depository Receipts - Tick size liquidity bands 1 and 2				
Notification if <1 average trade per business day in the previous year		N				
Top five execution brokers 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	
Morgan Stanley & Co. International PLC - 4PQUHN3JPFQFNF3BB653	60.4%	66.4%	39.7%	60.3%	0.0%	
Instinet Europe Limited - 213800MXAKR2LA1VBM44	39.3%	33.1%	34.6%	65.4%	0.0%	
Banco LJ Carregosa SA - 213800UFLAA5SS55IZ10	0.3%	0.5%	68.5%	31.5%	0.0%	

## RECEPTION AND TRANSMISSION OF ORDERS TOP 5 BROKERS - PROFESSIONAL CLIENTS

Class of Instrument		Interest rates derivatives - 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 brokers 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	
Morgan Stanley & Co. International PLC - 4PQUHN3JPF GFNF3BB653	70.6%	60.8%	87.0%	13.0%	0.0%	
Morgan Stanley & Co LLC - 9R7GPTSO7KV3UQJZQ078	25.7%	37.1%	77.0%	23.0%	0.0%	
JP Morgan Securities PLC - K6Q0W1PS1L1O4IQL9C32	3.7%	2.1%	32.1%	67.9%	0.0%	
Class of Instrument		Currency derivatives - 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 brokers 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	
Morgan Stanley & Co LLC - 9R7GPTSO7KV3UQJZQ078	96.2%	95.4%	80.1%	19.9%	0.0%	
Morgan Stanley & Co. International PLC - 4PQUHN3JPF GFNF3BB653	3.8%	4.6%	43.8%	56.2%	0.0%	
Class of Instrument		Equity Derivatives - Options and Futures admitted to trading on a trading venue				
Notification if <1 average trade per business day in the previous year		N				
Top five execution brokers 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	
JP Morgan Securities LLC - ZBUT11V806EZRV TWT807	35.6%	29.3%	34.2%	65.8%	0.0%	
JP Morgan Securities PLC - K6Q0W1PS1L1O4IQL9C32	32.7%	12.1%	75.8%	24.2%	0.0%	
Morgan Stanley & Co LLC - 9R7GPTSO7KV3UQJZQ078	26.0%	25.4%	57.5%	42.5%	0.0%	
Morgan Stanley & Co. International PLC - 4PQUHN3JPF GFNF3BB653	5.7%	33.2%	81.9%	18.1%	0.0%	
Nomura International PLC - DGQCSV2PHVF712743539	0.001%	0.001%	100.0%	0.0%	0.0%	

## RECEPTION AND TRANSMISSION OF ORDERS TOP 5 BROKERS - PROFESSIONAL CLIENTS

Class of Instrument		Securitised Derivatives - Warrants and Certificate Derivatives				
Notification if <1 average trade per business day in the previous year		Y				
Top five execution brokers 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	
Instinet LLC - 549300MGMN3RKMU8FT57	100.0%	100.0%	0.0%	100.0%	0.0%	
Class of Instrument		Commodities derivatives and emission allowances Derivatives - Options and Futures admitted to trading on a trading venue				
Notification if <1 average trade per business day in the previous year		N				
Top five execution brokers 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	
Morgan Stanley & Co LLC - 9R7GPTSO7KV3UQJZQ078	67.3%	73.0%	67.1%	32.9%	0.0%	
JP Morgan Securities PLC - K6Q0W1PS1L1O4IQL9C32	32.0%	25.2%	47.6%	52.4%	0.0%	
Morgan Stanley & Co. International PLC - 4PQUHN3JPFQFNF3BB653	0.7%	1.7%	79.4%	20.6%	0.0%	
Class of Instrument		Contracts for difference				
Notification if <1 average trade per business day in the previous year		N				
Top five execution brokers 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	
Instinet LLC - 549300MGMN3RKMU8FT57	52.7%	39.0%	60.9%	39.1%	0.0%	
JP Morgan Securities PLC - K6Q0W1PS1L1O4IQL9C32	28.2%	37.0%	31.1%	68.9%	0.0%	
Morgan Stanley & Co. International PLC - 4PQUHN3JPFQFNF3BB653	11.8%	13.2%	43.3%	56.7%	0.0%	
Instinet Europe Limited - 213800MXAKR2LA1VBM44	7.3%	10.7%	23.1%	76.9%	0.0%	
UBS Securities - BFM8T61CT2L1QCEMIK50	0.02%	0.10%	45.0%	55.0%	0.0%	



## RECEPTION AND TRANSMISSION OF ORDERS TOP 5 BROKERS - PROFESSIONAL CLIENTS

Class of Instrument	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	N				
Top five execution brokers 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
Citadel Securities LLC - 12UUJYTN7D3SW8KCSG25	57.7%	73.3%	23.3%	76.7%	0.0%
Morgan Stanley & Co. International PLC - 4PQUHN3JPFGFNF3BB653	34.0%	21.1%	41.1%	58.9%	0.0%
Instinet LLC - 549300MGMN3RKMU8FT57	4.3%	2.8%	14.3%	85.7%	0.0%
Instinet Europe Limited - 213800MXAKR2LA1VBM44	3.9%	2.6%	38.6%	61.4%	0.0%
FirstRand Bank Limited - ZAYQDKTCATIXF9OQY690	0.13%	0.24%	73.1%	26.9%	0.0%
Class of Instrument	Other instruments				
Notification if <1 average trade per business day in the previous year	N				
Top five execution brokers 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
Citadel Securities LLC - 12UUJYTN7D3SW8KCSG25	57.6%	49.2%	24.6%	75.4%	0.0%
Instinet LLC - 549300MGMN3RKMU8FT57	30.9%	41.8%	85.8%	14.2%	0.0%
Instinet Europe Limited - 213800MXAKR2LA1VBM44	7.4%	5.1%	73.1%	26.9%	0.0%
Morgan Stanley & Co. International PLC - 4PQUHN3JPFGFNF3BB653	3.1%	2.3%	39.5%	60.5%	0.0%
FirstRand Bank Limited - ZAYQDKTCATIXF9OQY690	0.99%	1.58%	54.9%	45.1%	0.0%

## EXECUTION TOP 5 VENUES - RETAIL CLIENTS

<b>Class of Instrument</b>	Equities – Shares & Depositary Receipts - Tick size liquidity bands 5 and 6				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	N				
<b>Top five execution venues ranked in terms of trading volumes (descending order)</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
Nasdaq Copenhagen A/S - XCSE	100.0%	100.0%			
<b>Class of Instrument</b>	Equities – Shares & Depositary Receipts - Tick size liquidity bands 3 and 4				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	N				
<b>Top five execution venues ranked in terms of trading volumes (descending order)</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
Nasdaq Copenhagen A/S - XCSE	100.0%	100.0%			
<b>Class of Instrument</b>	Equities – Shares & Depositary Receipts - Tick size liquidity bands 1 and 2				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	N				
<b>Top five execution venues ranked in terms of trading volumes (descending order)</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
Nasdaq Copenhagen A/S - XCSE	100.0%	100.0%			
<b>Class of Instrument</b>	Debt instruments - Bonds				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	N				
<b>Top five execution venues ranked in terms of trading volumes (descending order)</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
Saxo Bank A/S - 549300TL54061C1XKD09	80.0%	54.6%			
Tradeweb Europe Limited - 2138001WXZQOPMPA3D50	20.0%	45.4%			
Nasdaq Copenhagen A/S - XCSE	0.2%	0.5%			

## EXECUTION TOP 5 VENUES - RETAIL CLIENTS

<b>Class of Instrument</b>	Currency derivatives - Swaps, forwards, and other currency derivatives				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	N				
<b>Top five execution venues ranked in terms of trading volumes (descending order)</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
Saxo Bank A/S - 549300TL5406IC1XKD09	86.2%	84.2%			
JP Morgan Chase Bank NA - 7H6GLXDRUGQFU57RNE97	3.7%	3.9%			
Barclays Bank PLC - G5GSEF7VJP5I7OUK5573	1.8%	1.8%			
BNP Paribas - R0MUWSFPU8MPRO8K5P83	1.7%	1.4%			
Morgan Stanley - IGJSJL3JD5P3016NJZ34	1.2%	1.3%			
<b>Class of Instrument</b>	Contracts for difference				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	N				
<b>Top five execution venues ranked in terms of trading volumes (descending order)</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
Saxo Bank A/S - 549300TL5406IC1XKD09	100.0%	100.0%			
<b>Class of Instrument</b>	Exchange traded products (Exchange traded funds, exchange traded notes and exchange traded commodities)				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	N				
<b>Top five execution venues ranked in terms of trading volumes (descending order)</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
Bloomberg Trading Facility Limited - BMTF	100.0%	100.0%			
<b>Class of Instrument</b>	Other instruments				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	N				
<b>Top five execution venues ranked in terms of trading volumes (descending order)</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
Nasdaq Copenhagen A/S - XCSE	100.0%	100.0%			

## EXECUTION TOP 5 VENUES - PROFESSIONAL CLIENTS

<b>Class of Instrument</b>	Equities – Shares & Depositary Receipts - Tick size liquidity bands 5 and 6				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	N				
<b>Top five execution venues ranked in terms of trading volumes (descending order)</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
Nasdaq Copenhagen A/S - XCSE	100.0%	100.0%			
<b>Class of Instrument</b>	Equities – Shares & Depositary Receipts - Tick size liquidity bands 3 and 4				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	N				
<b>Top five execution venues ranked in terms of trading volumes (descending order)</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
Nasdaq Copenhagen A/S - XCSE	100.0%	100.0%			
<b>Class of Instrument</b>	Equities – Shares & Depositary Receipts - Tick size liquidity bands 1 and 2				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	N				
<b>Top five execution venues ranked in terms of trading volumes (descending order)</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
Nasdaq Copenhagen A/S - XCSE	100.0%	100.0%			
<b>Class of Instrument</b>	Debt instruments - Bonds				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	N				
<b>Top five execution venues ranked in terms of trading volumes (descending order)</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
Saxo Bank A/S - 549300TL54061C1XKD09	89.1%	49.5%			
Tradeweb Europe Limited - 2138001WXZQOPMPA3D50	10.9%	50.5%			

## EXECUTION TOP 5 VENUES - PROFESSIONAL CLIENTS

<b>Class of Instrument</b>	Currency derivatives - Swaps, forwards, and other currency derivatives				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	N				
<b>Top five execution venues ranked in terms of trading volumes (descending order)</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
Saxo Bank A/S - 549300TL5406IC1XKD09	39.2%	27.7%			
FastMatch Inc - 549300EXXMRP3JPN4C59	13.6%	11.3%			
JP Morgan Chase Bank NA - 7H6GLXDRUGQFU57RNE97	4.9%	7.1%			
Deutsche Bank AG - 7LTWFZYICNSX8D621K86	4.7%	5.7%			
Goldman Sachs - KD3XUN7C6T14HNAYLU02	4.1%	4.3%			
<b>Class of Instrument</b>	Contracts for difference				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	N				
<b>Top five execution venues ranked in terms of trading volumes (descending order)</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
Saxo Bank A/S - 549300TL5406IC1XKD09	100.0%	100.0%			
<b>Class of Instrument</b>	Exchange traded products (Exchange traded funds, exchange traded notes and exchange traded commodities)				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	N				
<b>Top five execution venues ranked in terms of trading volumes (descending order)</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
Bloomberg Trading Facility Limited - BMTF	100.0%	100.0%			
<b>Class of Instrument</b>	Other instruments				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	N				
<b>Top five execution venues ranked in terms of trading volumes (descending order)</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
Nasdaq Copenhagen A/S - XCSE	100.0%	100.0%			

## SAXO BANK A/S - TOP 5 BROKERS AND VENUES 2018

Given the differences in how firms obtain the best possible result for retail clients as compared to professional clients, the information on the top five execution venues must be provided distinctly for retail and professional clients.

ESMA considers that where firms provide both the services of order execution and reception and transmission of orders, they will need to provide two separate reports in relation to these services. It is important that these reports are distinct so that, investment firms disclose on one hand the top five execution venues and on the other hand the top five entities (brokers) to which client orders were routed during the relevant period.<sup>1</sup>

RTS 28 specifically defines passive and aggressive orders. A passive order means an order entered into the order book that provided liquidity. An aggressive order means an order entered into the order book that took liquidity. Arguably, therefore, this concept is only relevant where an order is sent to a venue running an order book.<sup>2</sup>

For orders sent to a venue not running an order book Saxo Bank will not include Passive/Aggressive Order Indicators.

Instrument Sub Class	Broker (Order reception and transmission)	Venue (Order execution)
Equities – Tick size liquidity bands 5 and 6 (from 2000 trades per day)	EU Cash Shares covered by the MiFID II tick size regime	EU Cash Shares covered by the MiFID II tick size regime
Equities – Tick size liquidity bands 3 and 4 (from 80 to 1999 trades per day)		
Equities – Tick size liquidity band 1 and 2 (from 0 to 79 trades per day)		
Debt instruments - Bonds		Bonds
Interest rates derivatives - Futures and options admitted to trading on a trading venue	Contract Futures and Contract Options within sectors “Financials - Short-term Interest Rates” and “Financials – Bonds”	
Currency derivatives - Futures and options admitted to trading on a trading venue	Contract Futures and Contract Options within sector “Financials – Currencies”	
Currency derivatives - Swaps, forwards, and other currency derivatives		FX Spot, FX Forwards, FX Options, FX NDFs
Equity Derivatives - Options and Futures admitted to trading on a trading venue	Equity Derivatives - Options and Futures admitted to trading on a trading venue	
Securitised Derivatives - Warrants and Certificate Derivatives	Warrants	
Commodities derivatives and emission allowances Derivatives - Options and Futures admitted to trading on a trading venue	Contract Futures and Contract Options within sectors “Agriculture”, “Base Metals”, “Commodity Index”, “Energies”, “Meats”, “Precious Metals”, “Softs”	
Contracts for difference	CFDs on Single Stocks/ETPs <sup>3</sup>	CFD Index Trackers CFD on Commodity CFD on FX CFD on Bond
Exchange traded products (Exchange traded funds, exchange traded notes and exchange traded commodities)	ETPs	ETPs
Other instruments	EU Cash Shares not covered by the MiFID II tick size regime US and APAC Cash Shares Mutual Funds	

<sup>1</sup> ESMA Q&A, Chapter 1 (Best Execution), Question 7

<sup>2</sup> RTS 28, Article 2

<sup>3</sup> SAXO BANK A/S ORDER EXECUTION POLICY, Schedule 4, Section 4.1

## QUALITY OF EXECUTION STATEMENT

### **Regulatory Technical Standard 28 Article 3(3), Directive 2014/65/EU (hereinafter MiFID II)**

The following report is a summary of the analysis and conclusions Saxo Bank A/S (hereinafter Saxo) draw from the detailed monitoring of the quality of execution obtained on the execution venues and through brokers for all client orders executed in the previous year.

**The report provides a general summary covering the asset class groupings below.** Where relevant, specific asset class comments will be made.

#### **1. Equities**

- a. Shares & Depository Receipts (all liquidity bands);
- b. Exchange Traded Products –  
Exchange Traded Funds, notes and commodities (ETF, ETN, ETC);
- c. Securitised Derivatives - Warrants and Certificate Derivatives.

#### **2. Debt Instruments**

- a. Bonds

#### **3. Contracts for Difference (CFD)**

- a. CFDs on Single Stocks and ETFs;
- b. CFD Index Trackers; and
- c. CFD Commodities.

#### **4. Foreign Exchange**

- a. Currency derivatives:
  - i. Swaps;
  - ii. forwards; and
  - iii. other currency derivatives.

#### **5. Listed Futures & Options**

- a. Interest Rate Derivatives - Futures & Options admitted to Trading on a Trading venue;
- b. Currency Derivatives – Futures & Options admitted to Trading on a Trading venue;
- c. Equity Derivatives - Futures and options admitted to trading on a trading venue;
- d. Commodities derivatives and emission allowances  
Derivatives - Options and Futures admitted to trading on a trading venue.

**A. What relative importance did Saxo give to the Execution Factors including, but not limited to price, costs, speed, and likelihood of execution when assessing the quality of execution?**

Saxo considered a number of factors that might be important to its clients. These are called the Execution Factors and are described in the Saxo Order Execution Policy at section 3.1

**FX:** Except for Limit Orders, Saxo placed the highest priority on total consideration (the combination of price and costs associated with dealing).

For Limit Orders where the client stipulated a price that was not immediately available in the market, Saxo placed the highest priority on execution at the clients specified price at the first possible opportunity. This means that Saxo prioritised speed and certainty of execution.

**CFD Indices & Commodities:** Saxo used a proprietary price which generally tracks that of the relevant underlying exchange traded market

**B. Did Saxo have any close-links, conflicts, or common ownerships with respect to any execution venues used to execute orders?**

Saxo did not have any close-links, conflicts, and/or common ownerships with respect to any execution venues used to execute orders. Saxo took reasonable care not to discriminate between execution venues other than on the basis of the Execution Factors relevant to the order concerned.

**C. Did Saxo have any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received;**

Saxo did not have any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received.

**D. What venues did Saxo access and did any factors lead to a change in the list of execution venues listed in the firm's execution policy?**

MiFID II introduced new trading venue types and new rules for existing venue types. The Saxo venue list in the Order Execution Policy has continued to see changes in 2018 and was updated to reflect changes to brokers and venues accessed by brokers.



**Equities:** Saxo continued to have only one direct exchange membership in 2018 to Regulated Market, Nasdaq OMX Copenhagen. The rest of the liquidity accessed by Saxo via brokers are listed in the RTS 28 Top 5 broker report. Saxo continued to monitor the market for relevant and beneficial liquidity.

**Bonds:** Saxo continued to be a participant of Tradeweb MTF. The rest of the extensive liquidity accessed by Saxo via liquidity providers is listed in the RTS 28 Top 5 broker report.

**E. Did order execution differ according to client categorization and if so where may it have affected the order execution arrangements?**

Saxo did not differ its Order Execution based on client category.

**F. When and why might other criteria have been given precedence over immediate price and cost when executing retail client orders and how would these other criteria have been instrumental in delivering the best possible result?**

When Saxo executed orders on behalf of clients, Best Execution was determined on the basis of the total consideration paid to or, by the client, unless the objective of execution of the order dictated otherwise as described in the Saxo Order Execution Policy at section 3.2.

The relative importance that Saxo attached to the Execution Factors in any particular case may have been affected by the circumstances of the order. These are called the Execution Criteria and are described in the Saxo Order Execution Policy 3.3

Other instances where other criteria may have been given precedence over price and cost:

- Specific instructions from the client
- Order aggregation
- Market Impact. Saxo routes to market using an algorithm that is customised for achieving best price whilst minimizing market impact.

**G. How have Saxo used data or tools in relation to the quality of execution, including data published by execution venues under RTS 27?**

In reviewing the quality of executions Saxo followed a governance process whereby executions are assessed for outliers. These outliers were reviewed using external, independent data sources as well as TCA available from our Executing Brokers and

Venues of execution. Any systematic deviations are rectified by making necessary changes, for example, configuration of smart order routers.

**In the review period of 2018 Saxo have not seen any systematic deviations from achieving Best Execution.**

Benchmarking

**Listed Contract Futures and Options:** we focused benchmarking on time to market. Saxo evaluates time to market and deviations from set thresholds. Where there is a routing delay of more than 2 standard deviations these executions are assessed.

**CFD:** Saxo establishes its own benchmark by assessing multiple data points from execution venues, or other relevant external inputs for each of the relevant underlying products. This enabled Saxo to check the fairness of the price proposed to the client.

Saxo monitored the inputs to the proprietary pricing and alerts were in place for when parameters go beyond thresholds set.

Monitoring of the pricing algorithm continued, and the data used was continuously reviewed.

**FX:** Saxo establishes its own benchmark by assessing multiple data points from liquidity providers, execution venues or other relevant external inputs for each of the relevant underlying products. This enabled Saxo to check the fairness of its price to the client.

**H. How have Saxo used output of a consolidated tape provider or any other algorithms to optimise and assess execution performances (where available)?**

There was no consolidated tape provider established under Article 65 MiFID II and therefore other data sets and algorithms to optimize and assess execution were used. Saxo will continue to monitor for any development of the consolidated tape service in Europe.