

Saxo Bank A/S

MiFID II RTS 28 – Annual Best Execution Disclosure 2017

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 Intl PLC - 4PQUHN3JPFQFNF3BB653		72.0%	77.5%	35.0%	65.0%	
Instinet Europe Limited - DGQCSV2PHVF7I2743539		22.6%	17.2%	28.9%	71.1%	
Banco LJ Carregosa SA - 213800UFLAA5SS5I210		4.3%	4.5%	61.1%	38.9%	
Banco Espírito Santo - UBGVXZLX4SCS302CM391		1.1%	0.7%	77.6%	22.4%	

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 Intl PLC - 4PQUHN3JPFQFNF3BB653		66.8%	67.0%	40.5%	59.5%	
Instinet Europe Limited - DGQCSV2PHVF7I2743539		23.3%	23.4%	35.1%	64.9%	
Banco LJ Carregosa SA - 213800UFLAA5SS5I210		8.0%	8.2%	63.6%	36.4%	
Banco Espírito Santo - UBGVXZLX4SCS302CM391		1.9%	1.4%			

Class of Instrument		Equities – Shares & Depository Receipts - Tick size liquidity band 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 Intl PLC - 4PQUHN3JPFQFNF3BB653		71.8%	70.3%	47.7%	52.1%	
Instinet Europe Limited - DGQCSV2PHVF7I2743539		22.3%	21.0%	34.1%	65.9%	
Banco LJ Carregosa SA - 213800UFLAA5SS5I210		5.1%	7.1%	71.8%	28.2%	
Banco Espírito Santo - UBGVXZLX4SCS302CM391		0.8%	1.5%	69.6%	30.4%	

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 Intl PLC - 4PQUHN3JPFQFNF3BB653		94.3%	93.7%	79.4%	20.6%	
Morgan Stanley & Co LLC - 9R7GPTSO7KV3UQJZQ078		2.9%	3.5%	74.6%	25.4%	
JPMorgan Chase Bank NA - K6Q0W1PS1L104IQL9C32		2.8%	2.8%	81.9%	18.1%	

Reception and Transmission of Orders Top 5 Brokers, Retail Clients

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 Intl PLC - 4PQUHN3JPFQFNF3BB653		93.5%	92.1%	38.9%	61.1%	
Morgan Stanley & Co LLC - 9R7GPTS07KV3UQJZQ078		6.5%	7.9%	62.3%	37.7%	
JPMorgan Chase Bank NA - K6Q0W1PS1L1O4IQL9C32		0.002%	0.01%			

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 Intl PLC - 4PQUHN3JPFQFNF3BB653		52.9%	77.1%	59.6%	40.4%	
JPMorgan Chase Bank NA - K6Q0W1PS1L1O4IQL9C32		41.7%	20.8%	40.5%	59.5%	
Morgan Stanley & Co LLC - 9R7GPTS07KV3UQJZQ078		5.4%	2.1%	47.7%	52.3%	

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
Citadel Securities LLC - 12UUJYTN7D3SW8KCSG25		60.9%	71.4%	20.0%	80.0%	
Instinet Europe Limited - DGQCSV2PHVF712743539		39.1%	28.6%	0.0%	100.0%	

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 Intl PLC - 4PQUHN3JPFQFNF3BB653		76.9%	78.4%	71.0%	29.0%	
JPMorgan Chase Bank NA - K6Q0W1PS1L1O4IQL9C32		18.3%	15.9%	54.7%	45.3%	
Morgan Stanley & Co LLC - 9R7GPTS07KV3UQJZQ078		4.8%	5.6%	68.1%	31.9%	

Reception and Transmission of Orders Top 5 Brokers, Retail Clients

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 - DGQCSV2PHVF7I2743539	64.6%	46.0%	13.7%	86.3%	
JPMorgan Chase Bank NA - K6Q0W1PS1L1O4IQL9C32	13.7%	18.4%	17.9%	82.1%	
Instinet Europe Limited - DGQCSV2PHVF7I2743539	10.4%	12.0%	28.5%	71.5%	
Morgan Stanley & Co Intl PLC - 4PQUHN3JPFQFN3BB653	9.6%	18.0%	25.2%	74.8%	
UBS Securities - BFM8T61CT2L1QCEMIK50	1.2%	2.5%	15.4%	84.6%	

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	59.6%	50.9%	32.6%	67.4%	
Morgan Stanley & Co Intl PLC - 4PQUHN3JPFQFN3BB653	28.9%	38.5%	17.0%	83.0%	
Instinet Europe Limited - DGQCSV2PHVF7I2743539	6.5%	6.5%	32.7%	67.3%	
Instinet LLC - DGQCSV2PHVF7I2743539	3.8%	1.7%	7.5%	92.5%	
Rand Merchant Bank - ZAYQDKTCATIXF9OQY690	0.9%	2.0%	21.4%	78.6%	

Class of Instrument	Other				
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	79.7%	74.5%	33.1%	66.9%	
Instinet LLC - DGQCSV2PHVF7I2743539	9.4%	8.4%	44.6%	55.4%	
Instinet Europe Limited - DGQCSV2PHVF7I2743539	8.2%	9.6%	49.9%	50.1%	
Rand Merchant Bank - ZAYQDKTCATIXF9OQY690	2.4%	7.2%	14.3%	85.7%	
Morgan Stanley & Co Intl PLC - 4PQUHN3JPFQFN3BB653	0.3%	0.2%	32.7%	67.3%	

Reception and Transmission of Orders Top 5 Brokers, Professional Clients

Class of Instrument	Equities – Shares & Depositary 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 Intl PLC - 4PQUHN3JPFGFNF3BB653	69.2%	70.5%	39.4%	60.6%	
Instinet Europe Limited - DGQCSV2PHVF712743539	30.8%	29.5%	16.7%	83.3%	

Class of Instrument	Equities – Shares & Depositary 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 Intl PLC - 4PQUHN3JPFGFNF3BB653	74.3%	75.6%	39.9%	60.1%	
Instinet Europe Limited - DGQCSV2PHVF712743539	25.7%	24.4%	36.4%	63.6%	

Class of Instrument	Equities – Shares & Depositary Receipts - Tick size liquidity band 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 Intl PLC - 4PQUHN3JPFGFNF3BB653	77.5%	74.5%	29.4%	68.6%	
Instinet Europe Limited - DGQCSV2PHVF712743539	22.5%	25.5%	38.1%	61.9%	

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 Intl PLC - 4PQUHN3JPFGFNF3BB653	96.6%	95.4%	79.5%	20.5%	
JPMorgan Chase Bank NA - K6Q0W1PS1L1O4IQL9C32	2.2%	2.1%	45.3%	54.7%	
Morgan Stanley & Co LLC - 9R7GPTSO7KV3UQJZQ078	1.1%	2.6%	71.0%	29.0%	

Reception and Transmission of Orders Top 5 Brokers, Professional Clients

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 Intl PLC - 4PQUHN3JPFQFNF3BB653	91.2%	94.0%			
Morgan Stanley & Co LLC - 9R7GPTS07KV3UQJZQ078	8.8%	6.0%	73.6%	26.4%	
JPMorgan Chase Bank NA - K6Q0W1PS1L1O4IQL9C32	0.01%	0.02%			

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 Intl PLC - 4PQUHN3JPFQFNF3BB653	77.0%	76.2%	73.4%	26.6%	
JPMorgan Chase Bank NA - K6Q0W1PS1L1O4IQL9C32	21.4%	21.9%	65.9%	34.1%	
Morgan Stanley & Co LLC - 9R7GPTS07KV3UQJZQ078	1.6%	2.0%	60.8%	39.2%	

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
JPMorgan Chase Bank NA - K6Q0W1PS1L1O4IQL9C32	69.6%	43.9%	33.5%	66.5%	
Morgan Stanley & Co Intl PLC - 4PQUHN3JPFQFNF3BB653	27.3%	51.3%	34.9%	65.1%	
Morgan Stanley & Co LLC - 9R7GPTS07KV3UQJZQ078	3.1%	4.8%	80.5%	19.5%	

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 - DGQCSV2PHVF7I2743539	46.0%	39.6%	13.7%	86.3%	
Morgan Stanley & Co Intl PLC - 4PQUHN3JPFQFNF3BB653	20.3%	27.5%	25.2%	74.8%	
JPMorgan Chase Bank NA - K6Q0W1PS1L1O4IQL9C32	20.1%	25.7%	17.9%	82.1%	
Instinet Europe Limited - DGQCSV2PHVF7I2743539	12.1%	6.9%	28.5%	71.5%	
UBS Securities - BFM8T61CT2L1QCCEMIK50	1.5%	0.3%	15.4%	84.6%	

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	66.6%	67.0%	35.2%	64.8%	
Morgan Stanley & Co Intl PLC - 4PQUHN3JPFGFNF3BB653	22.6%	27.5%	28.9%	71.1%	
Instinet LLC - DGQCSV2PHVF7I2743539	7.2%	0.7%			
Instinet Europe Limited - DGQCSV2PHVF7I2743539	3.5%	3.0%	0.0%	100.0%	
Rand Merchant Bank - ZAYQDKTCATIXF9OQY690	0.2%	1.8%	0.0%	100.0%	

Class of Instrument	Other				
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	78.9%	85.4%	23.2%	76.8%	
Instinet LLC - DGQCSV2PHVF7I2743539	14.0%	5.9%	35.9%	64.1%	
Instinet Europe Limited - DGQCSV2PHVF7I2743539	4.8%	3.2%	35.9%	64.1%	
Rand Merchant Bank - ZAYQDKTCATIXF9OQY690	1.8%	4.3%	22.1%	77.9%	
Morgan Stanley & Co Intl PLC - 4PQUHN3JPFGFNF3BB653	0.5%	1.1%			

Saxo Bank A/S – Top 5 Brokers January to December 2017

Explanatory Note Top 5 Brokers

Classification of Passive / Aggressive Orders:

Aggressive order is defined as an order that is submitted to a venue which runs an order book and took liquidity on the order book

Passive order is defined as an order that is submitted to a venue which runs an order book and provided liquidity on the order book

No orders are directed and therefore field is not specified

Categorization of Products into Classes of Financial Instruments:

Equities – Shares & Depositary Receipts

- EU Cash Shares covered by the MiFID II tick size regime. Instruments are placed into liquidity bands based on the ADNT (average daily number of transactions) values published by ESMA

Liquidity Band 6 can be seen as representing the most liquid instruments and Liquidity Band 1 the least liquid instruments, based on ADNT values.

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”

Equity Derivatives - Options and Futures admitted to trading on a trading venue

- Contract Futures and Contract Options within sector “Stock Indices” and Stock Options and Stock Index Options

Securitized 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/ETFs executed via agency model

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

- ETFs, ETN, ETC

Other

EU Cash Shares not covered by the MiFID II tick size regime

US and APAC Cash Shares

Mutual Funds

Data:

This first set of RTS 28 report is based on data for the calendar year 2017. However it should be noted that data on passive/aggressive indicators for orders is only included for Dec 2017, as data for the full preceding year has not been available. Thus indicator is not available for brokers/venues with no executions in Dec 2017.

ESMA has recognized that for the first set of RTS 28 reports, firms may not be able to fully report on information which is not available or applicable in relation to the preceding year e.g. where it is tied to new provisions stemming from MiFID II or MiFIR. (Question/Answer 6):

https://www.esma.europa.eu/system/files_force/library/esma35-43-349_mifid_ii_qas_on_investor_protection_topics.pdf

Execution Top 5 Venues, Retail Clients

Class of Instrument	Equities – Shares & Depositary Receipts - Tick size liquidity bands 5 and 6				
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
XCSE - Nasdaq Copenhagen A/S	100.0%	100.0%	56.3%	43.7%	
Class of Instrument	Equities – Shares & Depositary Receipts - Tick size liquidity bands 3 and 4				
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
XCSE - Nasdaq Copenhagen A/S	100.0%	100.0%	65.7%	34.3%	
Class of Instrument	Equities – Shares & Depositary Receipts - Tick size liquidity band 1 and 2				
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
XCSE - Nasdaq Copenhagen A/S	100.0%	100.0%	69.4%	30.6%	
Class of Instrument	Debt instruments - 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
Saxo Bank A/S - 549300TL5406IC1XKD09	91.8%	76.8%			
Tradeweb Europe Limited MTF - 2138001WXZQOPMPA3D50	8.2%	23.2%			

Execution Top 5 Venues, Retail Clients

Class of Instrument	Currency derivatives - Swaps, forwards, and other currency 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
Saxo Bank A/S - 549300TL5406IC1XKD09	64.7%	33.7%			
JP Morgan Chase Bank, NA - 7H6GLXDRUGQFU57RNE97	6.1%	11.9%			
HSFX - Hotspot FX ECN	2.9%	0.5%			
XTX Markets - 213800WPTIY9961G2O04	2.6%	6.4%			
Barclays Bank PLC - G5GSEF7VJP5I7OUK5573	2.6%	4.0%			

Class of Instrument	Contracts for difference				
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
Saxo Bank A/S - 549300TL5406IC1XKD09	100.0%	100.0%			

Class of Instrument	Other				
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
XCSE - Nasdaq Copenhagen A/S	100.0%	100.0%	39.1%	60.9%	

Execution Top 5 Venues, Professional Clients

Class of Instrument	Equities – Shares & Depositary Receipts - Tick size liquidity bands 5 and 6				
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
XCSE - Nasdaq Copenhagen A/S	100.0%	100.0%	57.7%	42.3%	

Class of Instrument	Equities – Shares & Depositary Receipts - Tick size liquidity bands 3 and 4				
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
XCSE - Nasdaq Copenhagen A/S	100.0%	100.0%	70.6%	29.4%	

Class of Instrument	Equities – Shares & Depositary Receipts - Tick size liquidity band 1 and 2				
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
XCSE - Nasdaq Copenhagen A/S	100.0%	100.0%	58.8%	41.2%	

Class of Instrument	Debt instruments - 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
Saxo Bank A/S - 549300TL5406IC1XKD09	77.8%	78.2%			
Tradeweb Europe Limited MTF - 2138001WXZQOPMPA3D50	22.2%	21.8%			

Execution Top 5 Venues, Professional Clients

Class of Instrument	Currency derivatives - Swaps, forwards, and other currency 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
Saxo Bank A/S - 549300TL54061C1XKD09	69.9%	38.4%			
JP Morgan Chase Bank, NA - 7H6GLXDRUGQFU57RNE97	6.1%	7.8%			
XTX Markets - 213800WPTIY9961G2O04	3.1%	5.1%			
Credit Suisse - ANGGYXNX0JLX3X63JN86	3.0%	7.7%			
Goldman Sachs - W22LROWP2IHZNBB6K528	2.3%	3.4%			

Class of Instrument	Contracts for difference				
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
Saxo Bank A/S - 549300TL54061C1XKD09	100.0%	100.0%			

Class of Instrument	Other				
Notification if <1 average trade per business day in the previous year	Y				
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
XCSE - Nasdaq Copenhagen A/S	100.0%	100.0%	40.0%	60.0%	

Saxo Bank A/S – Top 5 Venues January to December 2017

Explanatory Note Top 5 Venues

Classification of Passive / Aggressive Orders:

Aggressive order is defined as an order that is submitted to a venue which runs an order book and took liquidity on the order book

Passive order is defined as an order that is submitted to a venue which runs an order book and provided liquidity on the order book

No orders are directed and therefore field is not specified

For orders executed via venues/ liquidity providers/market makers not running an order book the passive/aggressive classification is not relevant and thus is not specified.

Categorization of Products into Classes of Financial Instruments:

Equities – Shares & Depositary Receipts

- EU Cash Shares covered by the MiFID II tick size regime. Instruments are placed into liquidity bands based on the ADNT (average daily number of transactions) values published by ESMA

Liquidity Band 6 can be seen as representing the most liquid instruments and Liquidity Band 1 the least liquid instruments, based on ADNT values.

Debt instruments – Bonds

- Bonds

Currency derivatives - Swaps, forwards, and other currency derivatives

- FX Spot, FX Forwards, FX Options, FX NDFs

Contracts for difference

- CFD Index Trackers, CFD on Commodity, CFD on FX, CFD on Bond

Other

- EU Cash Shares not covered by the MiFID II tick size regime

Data:

This first set of RTS 28 report is based on data for the calendar year 2017. However it should be noted that data on passive/aggressive indicators for orders is only included for Dec 2017, as data for the full preceding year has not been available. Thus indicator is not available for brokers/venues with no executions in Dec 2017.

ESMA has recognized that for the first set of RTS 28 reports, firms may not be able to fully report on information which is not available or applicable in relation to the preceding year e.g. where it is tied to new provisions stemming from MiFID II or MiFIR. (Question/Answer 6):

https://www.esma.europa.eu/system/files_force/library/esma35-43-349_mifid_ii_qas_on_investor_protection_topics.pdf

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 is broken down by asset class groupings as follows:

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.

The report includes, where relevant:

- A. An explanation of the relative importance the firm gave to the Execution Factors. These factors included, but are not limited to price, costs, speed, and likelihood of execution when assessing the quality of execution;

- B. A description of any close-links, conflicts, 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;
- D. An explanation of factors that led to a change in the list of execution venues listed in the firm's execution policy;
- E. An explanation of how order execution differs according to client categorisation, where the firm treats such category of client differently and where it may affect the order execution arrangements;
- F. An explanation of when and why 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;
- G. An explanation of how the firm has used any data or tools relation to the quality of execution, including data published by execution venues under RTS 27;
- H. An explanation of how the firm has used output of a consolidated tape provider which allows for the development of enhanced measures of execution quality or any other algorithms used to optimise and assess execution performances (if applicable).

General Comments relevant across all Asset classes

This report talks about the annual findings on the Order Execution Quality for 2017.

Point A - Saxo has considered a number of criteria that might be important to its clients. These are called the Execution Factors and are listed in 3.1 of the Order Execution Policy.

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

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

Point D - MiFID II introduced new trading venue types and new rules for existing venue types. The Saxo Venue list in the Order Execution Policy has been updated to reflect any changes to brokers and venues accessed by brokers.

Point E – Saxo does not differ its Order Execution based on client category.

Point F – As per above, all client categorizations are treated the same and therefore execution is determined on the basis of total consideration as described in the Order Execution Policy at section 3.2.

The relative importance that Saxo attaches to the Execution Factors in any particular case may be affected by the circumstances of the order. These are called the Execution Criteria and can be found in the Saxo Order Execution Policy 3.3

Point G - The use of RTS 27 reports will be for 2018 as they were only published by execution venues as of 3 January 2018 when MiFID II came into force.

Point H - There was no consolidated tape provider established under Article 65 MiFID II and therefore other data sets and algorithms to optimize and assess execution will be referred to where relevant.

Equities, Equity Like Products & Single Stocks CFDs.	
(a)	<p>There was relative importance given to the Execution Factors by Saxo and any other consideration including qualitative factors when assessing the quality of execution.</p> <p>For Equities the Execution Factors are considered as follows:</p> <ul style="list-style-type: none"> a. Price; b. Expected impact of execution; c. Likelihood of execution and settlement; d. Costs; e. Speed; f. Other factors
(b)	<p>Close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders:</p> <p>See general comment section B</p>
(c)	<p>Specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received;</p> <p>See general comment section C</p>
(d)	<p>Factors that led to a change in the list of execution venues listed in the firms execution policy, if such a change occurred were:</p> <p>Saxo only has membership to one venue, Nasdaq OMX Copenhagen. The rest of the extensive liquidity accessed by Saxo is via brokers of which are listed in the RTS 28 Top 5 broker report. Saxo continually monitor the market for relevant and beneficial liquidity.</p> <p>As part of the MiFID II Market Structure change, Saxo found it beneficial to add Nasdaq Auction on Demand, a new periodic auction service. For Equities there was an increase in liquidity providers registering as Systematic Internalisers in 2017. This has been reflected in the Order Execution Policy.</p> <p>There were no other changes in 2017.</p>
(e)	<p>How order execution differs according to client categorisation, where the firm treats categories of clients differently and where it may affect the order execution arrangements.</p> <p>Saxo apply one Order Execution Policy to all clients.</p>

(f)	<p>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.</p> <p>When Saxo executes orders on behalf of clients, Best Execution is determined on the basis of the total consideration paid to or, by the client, unless the objective of execution of the order dictates otherwise.</p> <p>Criteria that may be given precedence includes potential Market Impact. Saxo routes to market using an algorithm that is customised for achieving best price whilst minimizing market impact.</p>
(g)	<p>How Saxo have used any data or tools relating to the quality of execution, including any data published under the Commission Delegated Regulation, to be provided by execution venues on the quality of execution of transactions.</p> <p>In reviewing the quality of executions Saxo follows a governance process whereby executions are assessed for outliers. These outliers are reviewed using external, independent data sources. Any systematic deviations are rectified by making necessary changes, for example, configuration of smart order routers.</p> <p>In the review period of 2017 Saxo have not seen any systematic deviations from achieving Best Execution.</p>
(h)	<p>How Saxo has used the output of a consolidated tape provider as established under Article 65 of MiFID II or any other algorithms used to optimise and assess execution performances.</p> <p>No consolidated tape provider was established under MiFID II.</p>

	<h2>BONDS</h2>
(a)	<p>Relative importance the firm gave to the Execution Factors or any other consideration including qualitative factors when assessing the quality of execution.</p> <p>For Bonds the Execution Factors are considered as follows:</p> <ol style="list-style-type: none"> a. Price; b. Expected impact of execution; c. Likelihood of execution and settlement; d. Costs; e. Speed; f. Other factors
(b)	<p>Close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders.</p> <p>See general comment section B</p>
(c)	<p>Specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received.</p> <p>See general comment section C</p>
(d)	<p>Factors that led to a change in the list of execution venues listed in the firms Execution Policy, if such a change occurred.</p> <p>Saxo is a participant of Tradeweb MTF. The rest of the extensive liquidity accessed by Saxo is via liquidity providers as listed in the RTS 28 Top 5 broker report.</p> <p>Saxo continually monitor the market for relevant and beneficial liquidity.</p>

(e)	<p>How order execution differs according to client categorisation, where the firm treats categories of clients differently and where it may affect the order execution arrangements.</p> <p>Saxo apply one Order Execution Policy to all clients.</p>
(f)	<p>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.</p> <p>See general comment section F</p>
(g)	<p>How Saxo have used any data or tools relating to the quality of execution, including any data published under Commission Delegated Regulation for the data to be provided by execution venues on the quality of execution of transactions.</p> <p>All orders are benchmarked against the market at time of execution by Saxo and stored accordingly for future evidencing.</p> <p>In the review period of 2017 Saxo have not seen any systematic deviations from achieving Best Execution.</p>
(h)	<p>How Saxo has used output of a consolidated tape provider established under Article 65 MiFID II or any other algorithms used to optimise and assess execution performances.</p> <p>No consolidated tape provider was established under MiFID II..</p>

	<p>Contracts for Difference</p>
(a)	<p>Relative importance the firm gave to the Execution Factors or any other consideration including qualitative factors when assessing the quality of execution.</p> <p>For CFDs Execution Factors considered were as follows:</p> <ul style="list-style-type: none"> a. Price; b. Expected impact of execution; c. Likelihood of execution and settlement; d. Costs; e. Speed; f. Other factors <p>The price of CFD Indices & Commodities is a proprietary price derived by Saxo and will generally track that of the relevant underlying exchange traded market.</p>
(b)	<p>Close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders.</p> <p>See general comment section B</p>
(c)	<p>Specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received.</p> <p>See general comment section C</p>

(d)	<p>Factors that led to a change in the list of execution venues listed in the firms execution policy, if such a change occurred.</p> <p>MiFID II introduced new trading venue types and new rules for existing venue types. The Saxo Venue list in the Order Execution Policy has been updated to reflect the changes to brokers and venues accessed by brokers.</p> <p>There were no specific changes to venues in 2017</p>
(e)	<p>How order execution differs according to client categorisation, where the firm treats categories of clients differently and where it may affect the order execution arrangements.</p> <p>Saxo apply one Order Execution Policy to all clients.</p>
(f)	<p>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.</p> <p>When Saxo executes orders on behalf of clients, Best Execution is determined on the basis of the total consideration paid to or by the client, unless the objective of execution of the order dictates otherwise.</p> <p>The relative importance that Saxo attaches to the Execution Factors in any particular case may be affected by the circumstances of the order. These are called the Execution Criteria and can be found in the Order Execution Policy.</p>
(g)	<p>How Saxo have used any data or tools relating to the quality of execution, including any data published under Commission Delegated Regulation to be provided by execution venues on the quality of execution of transactions.</p> <p>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 enables Saxo to check the fairness of the price proposed to the client.</p> <p>Saxo monitors the inputs to the proprietary pricing and alerts are in place for when parameters go beyond thresholds set. Monitoring of the pricing algorithm is also in place.</p> <p>The data used is continuously reviewed. Saxo have not seen any systematic deviations in 2017.</p>
(h)	<p>How Saxo has used output of a consolidated tape provider established under Article 65 of MiFID II or any other algorithms used to optimise and assess execution performances</p> <p>No consolidated tape provider was established under MiFID II.</p>

	<p>Foreign Exchange</p>
(a)	<p>Relative importance the firm gave to the Execution Factors or any other consideration including qualitative factors when assessing the quality of execution.</p> <p>Except for Limit Orders, Saxo will place the highest priority on total consideration (the combination of price and costs associated with dealing).</p> <p>For Limit Orders where the client has stipulated a price that is not immediately available in the market, Saxo will place the highest priority on execution at the clients specified price at the first possible opportunity. This means that Saxo will prioritise speed and certainty of execution.</p>

(b)	<p>Close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders.</p> <p>See general comment section B</p>
(c)	<p>Specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received.</p> <p>See general comment section C</p>
(d)	<p>Factors that led to a change in the list of execution venues listed in the firm's execution policy, if such a change occurred.</p> <p>MiFID II introduced new trading venue types and new rules for existing venue types. The Saxo venue list in the Order Execution Policy has been updated to reflect the changes to brokers and venues accessed by brokers.</p> <p>No specific changes to venues in 2017.</p>
(e)	<p>How order execution differs according to client categorisation, where the firm treats categories of clients differently and where it may affect the order execution arrangements</p> <p>Saxo apply one Order Execution Policy to all clients.</p>
(f)	<p>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.</p> <p>When Saxo executes orders on behalf of clients, Best Execution is determined on the basis of the total consideration paid to or by the client, unless the objective of execution of the order dictates otherwise.</p>
(g)	<p>How Saxo have used any data or tools relating to the quality of execution, including any data published under Commission Delegated Regulation for the data to be provided by execution venues on the quality of execution of transactions.</p> <p>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 enables Saxo to check the fairness of its price to the client.</p> <p>Saxo have not seen any systematic deviations in 2017</p>
(h)	<p>How Saxo has used output of a consolidated tape provider established under Article 65 of MiFID II or any other algorithms used to optimise and assess execution performances.</p> <p>No consolidated tape provider was established under MiFID II.</p>

	Listed Futures & Options
(a)	<p>Relative importance the firm gave to the Execution Factors or any other consideration including qualitative factors when assessing the quality of execution.</p> <p>Exchange traded</p> <p>For Futures & Options Execution Factors are considered as follows:</p> <ul style="list-style-type: none"> a. Price; b. Expected impact of execution; c. Likelihood of execution and settlement; d. Costs; e. Speed; f. Other factors
(b)	<p>Close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders;</p> <p>See general comment section B</p>
(c)	<p>Specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received;</p> <p>See general comment section C</p>
(d)	<p>Factors that led to a change in the list of execution venues listed in the firm's execution policy, if such a change occurred;</p> <p>No changes to venues in 2017</p>
(e)	<p>How order execution differs according to client categorisation, where the firm treats categories of clients differently and where it may affect the order execution arrangements.</p> <p>Saxo apply one Order Execution Policy to all clients as per the Order Execution Policy.</p>
(f)	<p>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.</p> <p>When Saxo executes orders on behalf of clients, Best Execution is determined on the basis of the total consideration paid to or by the client, unless the objective of execution of the order dictates otherwise.</p> <p>The relative importance that Saxo attaches to the Execution Factors in any particular case may be affected by the circumstances of the order. These are called the Execution Criteria and can be found in the Order Execution Policy.</p>
(g)	<p>How Saxo have used any data or tools relating to the quality of execution, including any data published under Commission Delegated Regulation for the data to be provided by execution venues on the quality of execution of transactions</p> <p>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.</p> <p>Saxo have not seen any systematic deviations in 2017.</p>
(h)	<p>Where applicable, an explanation of how the investment firm has used output of a consolidated tape provider established under Article 65 of MiFID II or any other algorithms used to optimise and assess execution performances.</p> <p>No consolidated tape provider was established under MiFID II.</p>