

# Annual publication of information on the identity of the Top 5 execution venues and/or financial intermediaries and on the quality of execution

(in accordance with article 3 of the delegated regulation (EU) 2017/576 of the commission (8 June 2016) and article 65, paragraph 6 of the delegated regulation (EU) 2017/565 (25 April 2016) of the markets in financial instruments directive 2014/65/EU (MiFID II))

### **REPORT 2019 - ACTIVITY 2018**

Date of publication

25-April-2019



Directive 2014/65/EU on markets in financial instruments (MiFID II) requires investment firms executing client orders to draw up a top five reporting of execution venues and / or financial intermediaries they rely upon for order execution once a year. The ranking should be done in terms of trading volumes (expressed as a percentage) in executed client orders of the preceding year and the report should contain information related to the quality of order execution during that year. The publication deadline for the report is April 30.

As required under MiFID, the information should be made available for all financial instruments that have been defined in the directive, and a clear distinction should be made between retail and professional clients. It should be noted that the figures related to Eligible Counterparties are not included in the reports.

Due to the specific nature of this type of transactions, investment firms involved in Securities Financing Transactions (SFT) should publish a separate top five reporting with the main execution venues

The Bank publishes, for all its activities (receiving and transmitting orders, execution on behalf of clients, Securities financing transactions), four reports with the content and format as defined by MiFID II in article 3 of the delegated regulation (EU) 2017/576 of the commission (8 June 2016) and article 65, paragraph 6 of the delegated regulation (EU) 2017/565 (25 April 2016).

The present document contains the below reports :

<b>1. Receiving and transmitting of orders</b> This report contains the 5 main financial intermediaries the Bank uses for the execution of client orders.				
2. Execution on behalf of the client	This report contains the 5 main execution venues on which the Bank has executed client orders			
3. Securities Financing Transactions (SFT)	This report contains the Securities Financing Transactions, for which a separate report needs to be published			
4. Quality of Execution	This report contains a summary of the analysis made by the Bank and the conclusions drawn from the detailed monitoring of the quality of execution			

The content of this document has been finalized on 15 April 2019. Although BNP Paribas Fortis has taken all reasonable steps to safeguard the correctness, accuracy and nonmisleading nature of the information, the Bank does not accept liability for any damage suffered by clients except in the case of fraud or serious misconduct.



#### MiFID II - REPORT TOP5 (2019) RECEIVING TRANSMITTING OF ORDERS

**Retail clients** 

**TOP5** Financial Intermediaries

Class of instrument		(A) EQUITIE	S - SHARES & DEPOSITARY RECEIPTS			
Notification if <1 average trade per business day in the previous year			Ν			
Top five financial intermediaries 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	
(i) Tick size liquidity bands 5 and 6 (from 2000 trades	s per day)		-			
BNP Paribas SA (BDDF RTO) ROMUWSFPU8MPRO8K5P83	19.13%	48.73%	Not Applicable	Not Applicable	1.07%	
Exane SA 969500UP76J52A9OXU27	4.72%	2.51%	21.67%	51.62%	0.00%	
Kepler Chevreux SA 9695005EOZG9X8IRJD84	0.48%	1.27%	67.60%	25.86%	0.00%	
(ii) Tick size liquidity bands 3 and 4 (from 80 to 1999	trades per day)					
BNP Paribas SA (BDDF RTO) ROMUWSFPU8MPRO8K5P83	32.50%	32.34%	Not Applicable	Not Applicable	1.06%	
Exane SA 969500UP76J52A9OXU27	0.92%	0.27%	7.60%	32.78%	0.00%	
BNP Paribas Securities Corp. RCNB6OTYUAMMP879YW96	0.14%	0.08%	Not Applicable	Not Applicable	0.00%	
Kepler Chevreux SA 9695005EOZG9X8IRJD84	0.01%	0.00%	41.76%	44.60%	0.00%	
(iii) Tick size liquidity bands 1 and 2 (from 0 to 79 tra	ides per day)					
BNP Paribas SA (BDDF RTO) ROMUWSFPU8MPRO8K5P83	34.97%	13.55%	Not Applicable	Not Applicable	0.84%	
Kyte Broking Ltd 1ZU7M6R6N6PXYJ6V0C83	2.17%	0.00%	Not Applicable	Not Applicable	0.00%	
BNP Paribas Securities Corp. RCNB6OTYUAMMP879YW96	0.64%	0.09%	Not Applicable	Not Applicable	0.00%	
Kepler Chevreux SA 9695005EOZG9X8IRJD84	0.31%	0.00%	Not Applicable	Not Applicable	0.00%	
Exane SA 969500UP76J52A9OXU27	0.21%	0.07%	2.61%	7.76%	1.99%	
Tick size liquidity bands not available						
BNP Paribas SA (BDDF RTO) ROMUWSFPU8MPRO8K5P83	3.72%	1.07%	Not Applicable	Not Applicable	0.63%	
BNP Paribas Securities Corp. RCNB6OTYUAMMP879YW96	0.05%	0.01%	Not Applicable	Not Applicable	0.00%	



Class of instrument	(G) (i) EQUITY DERIVATIVES (Options and futures admitted to trading on a trading venue)					
Notification if <1 average trade per business day in		Ν				
the previous year	N					
Top five financial intermediaries ranked in terms of	Proportion of volume traded as a	Proportion of orders executed as	Dercentage of passive orders	Demonstrant of aggressive orders	Percentage of directed orders	
trading volumes (descending order)	percentage of total in that class	percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders	
BNP Paribas SA (BDDF RTO)	100.000/	100.00%			0.000/	
R0MUWSFPU8MPRO8K5P83	100.00%	100.00%	Not Applicable	Not Applicable	0.00%	

Class of instrument	(H) (i) SECURITIZED DERIVATIVES (Warrants and certificate derivatives)					
Notification if <1 average trade per business day in the previous year		Ν				
Top five financial intermediaries ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Percentage of passive orders Percentage of aggressive orders Percentage of directed or				
BNP Paribas SA (BDDF RTO) ROMUWSFPU8MPRO8K5P83	99.83%	99.90%	Not Applicable	Not Applicable	0.48%	
BNP Paribas SA, London branch ROMUWSFPU8MPRO8K5P83	0.10%	0.03%	Not Applicable	Not Applicable	0.00%	
Exane SA 969500UP76J52A9OXU27	0.07%	0.03%	Not Applicable	Not Applicable	0.00%	
Kepler Chevreux SA 9695005EOZG9X8IRJD84	0.00%	0.03%	Not Applicable	Not Applicable	0.00%	



#### MiFID II - REPORT TOP5 (2019) RECEIVING TRANSMITTING OF ORDERS

Class of instrument	(K) EXCHANGE TRADED PRODUCTS						
Notification if <1 average trade per business day in the previous year		Ν					
Top five financial intermediaries ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Percentage of passive orders Percentage of aggressive orders Percentage of aggressive orders Percentage of directed or					
BNP Paribas SA (BDDF RTO) ROMUWSFPU8MPRO8K5P83	43.65%	35.97%	Not Applicable	Not Applicable	1.91%		
BNP Paribas SA, London branch ROMUWSFPU8MPRO8K5P83	37.31%	43.94%	Not Applicable	Not Applicable	0.00%		
Exane SA 969500UP76J52A9OXU27	18.91%	20.06%	Not Applicable	Not Applicable	0.03%		
BNP Paribas Securities Corp. RCNB6OTYUAMMP879YW96	0.12%	0.03%	Not Applicable	Not Applicable	0.00%		

Class of instrument	(M) OTHER INSTRUMENTS					
Notification if <1 average trade per business day in	Ν					
the previous year	Ν					
Top five financial intermediaries ranked in terms of	Proportion of volume traded as a	Proportion of orders executed as	Percentage of passive orders	Dercentage of aggressive orders	Percentage of directed orders	
trading volumes (descending order)	percentage of total in that class	percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders	
BNP Paribas SA (BDDF RTO)	100.000/	100.00%			4.25%	
R0MUWSFPU8MPRO8K5P83	100.00%	100.00% 100.00% Not Applicable	Not Applicable	1.35%		



#### **TOP5** Financial Intermediaries

**Professional clients** 

Class of instrument	(A) EQUITIES - SHARES & DEPOSITARY RECEIPTS								
Notification if <1 average trade per business day in the previous year		Ν							
Top five financial intermediaries 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				
i) Tick size liquidity bands 5 and 6 (from 2000 trades per day)									
Exane SA 969500UP76J52A9OXU27	35.03%	18.81%	51.71%	38.94%	0.00%				
BNP Paribas SA (BDDF RTO) R0MUWSFPU8MPRO8K5P83	14.68%	48.12%	Not Applicable	Not Applicable	0.00%				
Kepler Chevreux SA 9695005EOZG9X8IRJD84	1.44%	2.38%	Not Applicable	Not Applicable	0.00%				
(ii) Tick size liquidity bands 3 and 4 (from 80 to 1999	trades per day)								
ING Bank NV 3TK20IVIUJ8J3ZU0QE75	31.39%	0.40%	Not Applicable	Not Applicable	0.00%				
BNP Paribas SA (BDDF RTO) R0MUWSFPU8MPRO8K5P83	6.85%	19.41%	Not Applicable	Not Applicable	0.00%				
Exane SA 969500UP76J52A9OXU27	5.44%	5.54%	13.81%	36.19%	0.00%				
BNP Paribas Securities Corp. RCNB6OTYUAMMP879YW96	0.04%	0.79%	Not Applicable	Not Applicable	0.00%				
(iii) Tick size liquidity bands 1 and 2 (from 0 to 79 tra	ades per day)								
BNP Paribas SA (BDDF RTO) ROMUWSFPU8MPRO8K5P83	1.27%	3.76%	Not Applicable	Not Applicable	0.00%				
Tick size liquidity bands not available									
BNP Paribas SA (BDDF RTO) ROMUWSFPU8MPRO8K5P83	3.86%	0.79%	Not Applicable	Not Applicable	0.00%				



Class of instrument	(H) (i) SECURITIZED DERIVATIVES (Warrants and certificate derivatives)					
Notification if <1 average trade per business day in		Ν				
the previous year	Ν					
Top five financial intermediaries ranked in terms of	Proportion of volume traded as a	Proportion of orders executed as	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders	
trading volumes (descending order)	percentage of total in that class	percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders	
BNP Paribas SA (BDDF RTO)	100.00%	100.00%	Not Applicable	Not Applicable	0.00%	
R0MUWSFPU8MPRO8K5P83	100.00%	100.00%	Not Applicable	Not Applicable	0.00%	

Class of instrument	(K) EXCHANGE TRADED PRODUCTS					
Notification if <1 average trade per business day in	Ν					
the previous year		N				
Top five financial intermediaries ranked in terms of	Proportion of volume traded as a	Proportion of orders executed as	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders	
trading volumes (descending order)	percentage of total in that class	percentage of total in that class	Percentage of passive orders	Fercentage of aggressive orders	Fercentage of directed orders	
BNP Paribas SA (BDDF RTO)	61.47%	37.21%	Not Applicable	Not Applicable	0.00%	
ROMUWSFPU8MPRO8K5P83	01.47%	37.21%	Not Applicable	Not Applicable	0.00%	
Exane SA	20.07%		Not Applicable	Not Applicable	0.00%	
969500UP76J52A9OXU27	29.97%	25.58%	Not Applicable	Not Applicable	0.00%	
BNP Paribas SA, London branch	0.55%	27 210/		Net Anglinghia	0.00%	
ROMUWSFPU8MPRO8K5P83	8.55%	37.21%	Not Applicable	Not Applicable	0.00%	



**TOP5 Execution Venues** 

**Retail clients** 

Class of instrument		(A) EQUITIES - SHARES & DEPOSITARY RECEIPTS						
Notification if <1 average trade per business day in the previous year		Ν						
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Percentage of passive orders Percentage of aggressive orders Percentage of directed orders						
(iii) Tick size liquidity bands 1 and 2 (from 0 to 79	(iii) Tick size liquidity bands 1 and 2 (from 0 to 79 trades per day)							
Euronext Expert Market VPXB (Euronext - Ventes Publiques Brussels)	99.71%	93.36%	Not Applicable	Not Applicable	0.00%			
Tick size liquidity bands not available								
<b>Euronext Expert Market</b> VPXB (Euronext - Ventes Publiques Brussels)	0.29%	6.64%	Not Applicable	Not Applicable	0.00%			

Class of instrument	(B) (i) DEBT INSTRUMENTS (Bonds)						
Notification if <1 average trade per business day in the previous year		Ν					
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		
BNP Paribas Fortis NV/SA KGCEPHLVVKVRZYO1T647	100.00%	100.00%	0.00%	100.00%	0.00%		

Class of instrument	(B) (ii) DEBT INSTRUMENTS (Money markets instruments)						
Notification if <1 average trade per business day in the previous year		Ν					
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		
BNP Paribas Fortis NV/SA KGCEPHLVVKVRZYO1T647	100.00%	100.00%	0.00%	100.00%	0.00%		



Class of instrument	(C) (i) INTEREST RATE DERIVATIVES (Options and futures admitted to trading on a trading venue)				
Notification if <1 average trade per business day in the previous year	Ν				
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
BNP Paribas Fortis NV/SA KGCEPHLVVKVRZYO1T647	100.00%	100.00%	0.00%	100.00%	0.00%

Class of instrument	(C) (ii) INTEREST RATE DERIVATIVES (Swaps, forwards and other interest rate 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
BNP Paribas Fortis NV/SA KGCEPHLVVKVRZYO1T647	100.00%	100.00%	0.00%	100.00%	0.00%

Class of instrument	(E) (i) CURRENCY DERIVATIVES (Futures and options admitted to trading on a trading venue)				
Notification if <1 average trade per business day in the previous year	Ν				
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
BNP Paribas Fortis NV/SA KGCEPHLVVKVRZYO1T647	100.00%	100.00%	0.00%	100.00%	0.00%

Class of instrument	[E) (ii) CURRENCY DERIVATIVES (Swaps, forwards and other currency derivatives)				
Notification if <1 average trade per business day in the previous year	Ν				
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
BNP Paribas Fortis NV/SA KGCEPHLVVKVRZYO1T647	100.00%	100.00%	0.00%	100.00%	0.00%



**TOP5 Execution Venues** 

**Professional clients** 

Class of instrument	(B) (i) DEBT INSTRUMENTS (Bonds)				
Notification if <1 average trade per business day in the previous year	Ν				
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
BNP Paribas Fortis NV/SA KGCEPHLVVKVRZYO1T647	100.00%	100.00%	0.00%	100.00%	0.00%

Class of instrument	(B) (ii) DEBT INSTRUMENTS (Money markets instruments)				
Notification if <1 average trade per business day in the previous year	Ν				
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
BNP Paribas Fortis NV/SA KGCEPHLVVKVRZYO1T647	100.00%	100.00%	0.00%	100.00%	0.00%

Class of instrument	(C) (ii) INTEREST RATE DERIVATIVES (Swaps, forwards and other interest rate derivatives)				
Notification if <1 average trade per business day in the previous year	Ν				
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
BNP Paribas Fortis NV/SA KGCEPHLVVKVRZYO1T647	100.00%	100.00%	0.00%	100.00%	0.00%



Class of instrument	(E) (i) CURRENCY DERIVATIVES (Futures and options admitted to trading on a trading venue)				
Notification if <1 average trade per business day in the previous year	Ν				
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
BNP Paribas Fortis NV/SA KGCEPHLVVKVRZYO1T647	100.00%	100.00%	0.00%	100.00%	0.00%

Class of instrument	[E) (ii) CURRENCY DERIVATIVES (Swaps, forwards and other currency derivatives)				
Notification if <1 average trade per business day in the previous year	Ν				
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
BNP Paribas Fortis NV/SA KGCEPHLVVKVRZYO1T647	100.00%	100.00%	0.00%	100.00%	0.00%

Class of instrument	(M) OTHER INSTRUMENTS				
Notification if <1 average trade per business day in the previous year	Ν				
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
BNP Paribas Fortis NV/SA KGCEPHLVVKVRZYO1T647	100.00%	100.00%	0.00%	100.00%	0.00%



	TOP5 Execution venues	Professional clients	
Class of Instrument	(M) OTHER INSTRUMENTS		
Notification if <1 average trade per business day in the previous year	Ν		
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	
BNP Paribas Fortis NV/SA KGCEPHLVVKVRZYO1T647	100.00%	100.00%	



### MiFID II - REPORT TOP5 (2019) SUMMARY OF THE ANALYSIS ON THE ORDER EXECUTION QUALITY

#### Introduction

Based on the analysis of the order execution quality, the Bank has drawn several conclusions and has thus updated its order execution policy that will enter into force as of May 1st, 2019. Below you can find a summary of the main changes and points of attention :

# The Bank has refined the selection of its market of reference for multi listed equities and exchange traded products respectively based on (1) the concept of "Home Market" (or domestic market) and (2) the concept of "EURO or other trading currencies".

# The Bank has extended the list of its multilateral trading facilites (MTF) to dark MTF's and has added additional Systematic Internalisers (SI)

# The Bank has launched Request For Quotes (RFQ) trading in Exhange Traded Funds (ETF) for care orders

# The Bank has strengthened the monitoring of its order execution quality.

The Bank also needs to make public the following information :



(a)

### MiFID II - REPORT TOP5 (2019) SUMMARY OF THE ANALYSIS ON THE ORDER EXECUTION QUALITY

## 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;

In order to ensure that the best possible result is obtained on a consistent basis while executing or receiving and transmitting client orders, the Bank takes into account the following execution factors: price, execution related costs, speed, likelihood of execution and settlement, size and nature of the order or any other consideration relevant to the execution of the order.

For retail clients under MiFID, the best possible result shall be determined in terms of total consideration (price + cost), both for orders that the Bank receives and transmits to a financial intermediary for execution and for orders that the Bank executes on behalf of the client. The costs that the Bank takes into account include its own execution costs as well as foreign exchange fees paid for financial instruments traded in a currency other than euro.

Depending on the order execution service provided, the Bank may alter the relative importance of the execution factor "total consideration" in favour of other factors, based on criteria like the size and nature of the order, the client MiFID classification (as retail or professional client) or the type and the level of liquidity of the financial instrument.

When receiving and transmitting orders in financial instruments traded on a trading venue, the Bank has refined as follows the selection of its market of reference for multi listed equities and exchange traded products in order to strengthen the relevance of the "total consideration" for its Clients :

• For a multi listed equity, the Bank relies, when executing clients orders, on the equity "Home market" (or "domestic market") provided that it offers an acceptable level of liquidity and thus a better price formation.

• For a multi listed exchange traded product, the Bank considers primarily a market of reference where the financial instrument is traded in EUR in order to eliminate (where possible) the foreign exchange fees and thus lower the execution costs for the Client. If the financial instrument is not traded in EUR, the Bank executes the client's order, where possible and available and by order of priority, in USD and alternatively in GBP (if USD is not available), except for an exchange traded product that tracks a GBP denominated index (e.g. FTSE UK) in which case the Bank would prevail GBP over USD.

For 'care orders', the Bank has put further emphasis on improving the execution price and the likelihood of execution. This has resulted into an extension of execution venues to dark MTF's and to Systematic Internalisers (see question d). Furthermore, the Bank has started onboarding new financial intermediaries to its Request For Quotes (RFQ) trading in exchange traded funds (ETF). These measures aim at increasing access to liquidity and improving execution prices.



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

For the order execution service of receiving and transmitting client orders applicable to financial instruments admitted to trading on a trading venue (like equities, exchange traded products, securitized derivatives and equity derivatives) the Bank, being part of the BNP Paribas Group, calls upon financial intermediaries, some of which are also an entity of that same BNP Paribas Group more in particular BNP Paribas SA; Exane SA; BNP Paribas Securities Corp.; BNP Paribas SA London Branch; BNP Paribas Securities Services Luxembourg Branch.

#### (c) a description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received;

For the order execution service of receiving and transmitting client orders, the Bank has not received any remuneration, discount or non-monetary benefit for routing client orders to a particular execution venue or financial intermediary which would infringe any conflict of interest or inducement requirements under MiFID.

#### (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;

The Bank reviews on a regular basis its markets of reference as part of its obligation to monitor the continued effectiveness of its order execution arrangements. As such the Bank has replaced markets of references that no longer meet the Bank's best execution requirements and thus would fail to achieve the best results for the clients.

For care orders, the Bank has extended the list of its MTF execution venues to dark MTF's with the objective to source extra liquidity and obtain a better execution price. Next to dark MTF's, the Bank has also access to systematic Internalisers through the financial intermediaries it relies upon. Both actions aim at gaining access to extra liquidity in the market and thus a better execution price for the client.



### MiFID II - REPORT TOP5 (2019) SUMMARY OF THE ANALYSIS ON THE ORDER EXECUTION QUALITY

an explanation of 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;

### (e)

(f)

The Bank offers two different types of order execution services :

- receiving and transmitting of client orders to financial intermediaries for execution
- execution of orders by the Bank, on behalf of the client.

The type of order execution service provided depends on the execution venues (accepted by the Bank) for each type of the financial instrument offered by the Bank. It is therefore independent from the MiFID client categorisation (retail clients versus professional clients). The Bank informs both retail and professional clients if it becomes aware of any material issues that would prevent it from carrying out their order.

However other aspects of the order execution depend on the client categorisation. This is for example the case for retail clients where the best possible result shall be determined in terms of "total consideration" whereas for professional clients other factors may take precedence (e.g. the size of the order or the speed of execution).

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;

Particularly for 'care orders' in financial instruments admitted to trading on a trading venue (like equities, exchange traded products, securitized derivatives, equity derivativest) precedence of other execution factors can be beneficial for the overall outcome of transactions. But only as far as it has an impact on the best possible result for the client, the Bank may give priority to the size of the order, the likelyhood of execution, the speed of execution and the expertise of the financial intermediary the Bank transmits the orders to.



### **MiFID II - REPORT TOP5 (2019)** SUMMARY OF THE ANALYSIS ON THE ORDER EXECUTION QUALITY

#### (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;

In order to monitor the quality of execution, the Bank uses comparative data and tools e.g. Bloomberg data, liquidity levels and price comparisons available on execution venues or made available by market makers, as well as execution reports from financial intermediaries. These data and tools are used on an ex-ante basis to determine a fair price or to choose the best price offered.

The Bank conducts regular assessments of the quality of execution on the basis of the orders it processed, to envisage possible improvements. For certain financial instruments, its post trade analysis is based on market data and various reference prices provided by third parties.

#### (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.

The Bank does not use any CTP for its Best execution analysis, but will monitor the availability and the quality of information they provide as part of on-going reviews of its best execution arrangements.

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