



BANQUE DE PATRIMOINES PRIVÉS  
Wealth Management

## **Quality of Execution Annual Report**

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Year 2017

## 1. Introduction

This report has been issued to comply with the provisions pursuant to the Directive 2014/65/UE of the European Parliament and of the Council of 15 May 2014 (“MiFID II”) and the Regulation (EU) 600/2014 of the European Parliament and of the Council of 15 May (“MiFIR”), which establish the obligation of Banque de Patrimoines Privés. (Hereinafter “**BPP**” or the “**Investment firm**”) to publish on an annual basis an assessment of the quality of execution obtained in the execution venues in which all the client orders have been executed during the previous year, with respect to each category of financial instrument contemplated in Annex I attached to this Report.

The aim of MiFID regulation for the elaboration of this report, is to provide investors a clear picture of the tools and execution strategies used to assess the execution obtained in the venues of all investment firm. This information will also allow investors to evaluate the effectiveness of the monitoring carried out by BPP in relation to the execution venues. The content of this report is regulated by the Commission Delegated Regulation (UE) 2017/576 of 8 June 2016 supplementing Directive 2014/65/UE

This report offers an analysis of BPP agreements with its execution venues in relation to payments made or received, discounts, reductions or non-monetary benefits received. Therefore, this evaluation will allow the public to consider the way in which said agreements affect the costs borne by the investors.

The information contained in this report will be reviewed and updated on an annual basis, and will refer to order execution behavior for each class of financial instruments

This document issued by BPP will be published on its website, in a machine-readable electronic format, available for downloading by the public.



## 2. Report content

1. EQUITIES — SHARES & DEPOSITARY RECEIPTS
<p>1. 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.</p>
<p>BPP when transmitting the client orders during 2017 (hereinafter, “<b>relevant period</b>”), has taken into account the following best execution technical standards for the executed orders concerning shares and depositary receipts:</p> <ul style="list-style-type: none"><li>• Speed of execution and settlement 40%</li><li>• Price and costs 20%</li><li>• Size and type of the order 20%</li><li>• Likelihood of execution and settlement 20%</li></ul>
<p>2. Description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders.</p>
<p>No close links, conflicts of interest and common ownerships has been identified with respect to any execution venues used to execute orders on shares and depositary receipts during the relevant period.</p>
<p>3. Description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received</p>
<p>BPP does not have any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received with respect to orders on shares and depositary receipts.</p>
<p>4. 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.</p>
<p>No changes have been made on the list of execution venues used to execute orders on shares and depositary receipts during the relevant period.</p>
<p>5. Explanation of how order execution differs according to client categorisation, where applicable.</p>
<p>BPP determines the optimal result of the orders execution for retail clients on shares and depositary receipts in terms of total consideration, composed by the price of the financial instrument and the cost related its execution, encompassing all charges and cost incurred by the client that are directly related to the order execution, including execution venue fees, clearing and settlement fees and any other fees paid to third parties involved in executing the order.</p> <p>For professional clients, BPP applies the relative weight of best execution factors set forth in point 1.</p> <p>In addition, BPP has monitored the existence of any potential incidents that could affect the accurate execution of orders, in case it would be necessary to implement special or temporary measures. To this matter, no relevant incidents have occurred during the relevant period that could have affected the quality of the execution.</p>



6. 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.

During the relevant period, BPP has given no precedence to other criteria over immediate price and cost (i.e. total consideration) when executing retail client orders on shares and depositary receipts.

7. Explanation of how the investment firm has used any data or tools relating to the quality of execution.

As stated by the European Securities and Markets Authority (hereinafter "**ESMA**"), in its document Q&A on MiFID II and MiFIR investor protection and intermediaries topics (Section 1 – Best Execution, Question n° 6), recognises that for investment firms may not be able to fully report information which is not available or applicable in relation to the preceding year in its Best Execution Reports issued in 2018.

Since they are not yet available, BPP has not been able to rely on the reports issued by the execution venues by virtue of the Commission Delegated Regulation (EU) 2017/575 (RTS 27).

8. Where applicable, an explanation of how the investment firm has used output of a consolidated tape provider.

BPP has not used output of a consolidated tape provider for the assessing the quality of order execution on shares and depositary receipts during the relevant period.



## 2. DEBT INSTRUMENTS

1. 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.

BPP when transmitting the client orders during 2017 (hereinafter, “**relevant period**”), has taken into account the following best execution technical standards for the executed orders concerning debt instruments:

- Speed of execution and settlement 40%
- Price and costs 20%
- Size and type of the order 20%
- Likelihood of execution and settlement 20%

2. Description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders.

No close links, conflicts of interest and common ownerships has been identified with respect to any execution venues used to execute orders on debt instruments during the relevant period.

3. Description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received.

BPP does not have any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received with respect to orders on debt instruments.

4. 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.

No changes have been made on the list of execution venues used to execute orders on debt instruments during the relevant period.

5. Explanation of how order execution differs according to client categorisation, where applicable.

BPP determines the optimal result of the orders execution for retail clients on debt instruments receipts in terms of total consideration, composed by the price of the financial instrument and the cost related its execution, encompassing all charges and cost incurred by the client that are directly related to the order execution, including execution venue fees, clearing and settlement fees and any other fees paid to third parties involved in executing the order.

For professional clients, BPP applies the relative weight of best execution factors set forth in point 1.

In addition, BPP has monitored the existence of any potential incidents that could affect the accurate execution of orders, in case it would be necessary to implement special or temporary measures. To this matter, no relevant incidents have occurred during the relevant period that could have affected the quality of the execution.



6. 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.

During the relevant period, BPP has given no precedence to other criteria over immediate price and cost (i.e. total consideration) when executing retail client orders on debt instruments.

7. Explanation of how the investment firm has used any data or tools relating to the quality of execution.

As stated by the European Securities and Markets Authority (hereinafter "**ESMA**"), in its document Q&A on MiFID II and MiFIR investor protection and intermediaries topics (Section 1 – Best Execution, Question n° 6), recognizes that for investment firms may not be able to fully report information which is not available or applicable in relation to the preceding year in its Best Execution Reports issued in 2018.

Since they are not yet available, BPP has not been able to rely on the reports issued by the execution venues by virtue of the Commission Delegated Regulation (EU) 2017/575 (RTS 27).

8. Where applicable, an explanation of how the investment firm has used output of a consolidated tape provider.

BPP has not used output of a consolidated tape provider for the assessing the quality of order execution on debt instruments during the relevant period.



### 3. INTEREST RATES DERIVATIVES

1. 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.

BPP when transmitting the client orders during 2017 (hereinafter, “**relevant period**”), has taken into account the following best execution technical standards for the executed orders concerning interest rates derivatives:

- Speed of execution and settlement 40%
- Price and costs 20%
- Size and type of the order 20%
- Likelihood of execution and settlement 20%

2. Description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders.

No close links, conflicts of interest and common ownerships has been identified with respect to any execution venues used to execute orders on interest rates derivatives during the relevant period.

3. Description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received.

BPP does not have any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received with respect to orders on interest rates derivatives.

4. 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.

No changes have been made on the list of execution venues used to execute orders on interest rates derivatives during the relevant period.

5. Explanation of how order execution differs according to client categorisation, where applicable.

BPP determines the optimal result of the orders execution for retail clients on interest rates derivatives receipts in terms of total consideration, composed by the price of the financial instrument and the cost related its execution, encompassing all charges and cost incurred by the client that are directly related to the order execution, including execution venue fees, clearing and settlement fees and any other fees paid to third parties involved in executing the order.

For professional clients, BPP applies the relative weight of best execution factors set forth in point 1.

In addition, BPP has monitored the existence of any potential incidents that could affect the accurate execution of orders, in case it would be necessary to implement special or temporary measures. To this matter, no relevant incidents have occurred during the relevant period that could have affected the quality of the execution.



6. 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.

During the relevant period, BPP has given no precedence to other criteria over immediate price and cost (i.e. total consideration) when executing retail client orders on interest rates derivatives.

7. Explanation of how the investment firm has used any data or tools relating to the quality of execution.

As stated by the European Securities and Markets Authority (hereinafter "**ESMA**"), in its document Q&A on MiFID II and MiFIR investor protection and intermediaries topics (Section 1 – Best Execution, Question n° 6), recognizes that for investment firms may not be able to fully report information which is not available or applicable in relation to the preceding year in its Best Execution Reports issued in 2018.

Since they are not yet available, BPP has not been able to rely on the reports issued by the execution venues by virtue of the Commission Delegated Regulation (EU) 2017/575 (RTS 27).

8. Where applicable, an explanation of how the investment firm has used output of a consolidated tape provider.

BPP has not used output of a consolidated tape provider for the assessing the quality of order execution on interest rates derivatives during the relevant period.





#### 4. CREDIT DERIVATIVES

1. 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.

BPP when transmitting the client orders during 2017 (hereinafter, “**relevant period**”), has taken into account the following best execution technical standards for the executed orders concerning credit derivatives:

- Speed of execution and settlement 40%
- Price and costs 20%
- Size and type of the order 20%
- Likelihood of execution and settlement 20%

2. Description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders.

No close links, conflicts of interest and common ownerships has been identified with respect to any execution venues used to execute orders on credits derivatives during the relevant period.

3. Description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received.

BPP does not have any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received with respect to orders on credit derivatives.

4. 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.

No changes have been made on the list of execution venues used to execute orders on credit derivatives during the relevant period.

5. Explanation of how order execution differs according to client categorisation, where applicable..

BPP determines the optimal result of the orders execution for retail clients on credit derivatives in terms of total consideration, composed by the price of the financial instrument and the cost related its execution, encompassing all charges and cost incurred by the client that are directly related to the order execution, including execution venue fees, clearing and settlement fees and any other fees paid to third parties involved in executing the order.

For professional clients, BPP applies the relative weight of best execution factors set forth in point 1.

In addition, BPP has monotorized the existence of any potential incidents that could affect the accurate execution of orders, in case it would be necessary to implement special or temporary measures. To this matter, no relevant incidents have occurred during the relevant period that could have affected the quality of the execution.

6. 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.

During the relevant period, BPP has given no precedence to other criteria over immediate price and cost (i.e. total consideration) when executing retail client orders on credit derivatives.

7. Explanation of how the investment firm has used any data or tools relating to the quality of execution.

As stated by the European Securities and Markets Authority (hereinafter "**ESMA**"), in its document Q&A on MiFID II and MiFIR investor protection and intermediaries topics (Section 1 – Best Execution, Question n° 6), recognizes that for investment firms may not be able to fully report information which is not available or applicable in relation to the preceding year in its Best Execution Reports issued in 2018.

Since they are not yet available, BPP has not been able to rely on the reports issued by the execution venues by virtue of the Commission Delegated Regulation (EU) 2017/575 (RTS 27).

8. Where applicable, an explanation of how the investment firm has used output of a consolidated tape provider.

BPP has not used output of a consolidated tape provider for the assessing the quality of order execution on credit derivatives during the relevant period.



## 5. CURRENCY DERIVATIVES

1. 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.

BPP when transmitting the client orders during 2017 (hereinafter, "**relevant period**"), has taken into account the following best execution technical standards for the executed orders concerning currency derivatives:

- Speed of execution and settlement 40%
- Price and costs 20%
- Size and type of the order 20%
- Likelihood of execution and settlement 20%

2. Description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders.

No close links, conflicts of interest and common ownerships has been identified with respect to any execution venues used to execute orders on currency derivatives during the relevant period.

3. Description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received.

BPP does not have any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received with respect to orders on currency derivatives.

4. 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.

No changes have been made on the list of execution venues used to execute orders on currency derivatives during the relevant period.

5. Explanation of how order execution differs according to client categorisation, where applicable.

BPP determines the optimal result of the orders execution for retail clients on currency derivatives in terms of total consideration, composed by the price of the financial instrument and the cost related its execution, encompassing all charges and cost incurred by the client that are directly related to the order execution, including execution venue fees, clearing and settlement fees and any other fees paid to third parties involved in executing the order.

For professional clients, BPP applies the relative weight of best execution factors set forth in point 1.

In addition, BPP has monitored the existence of any potential incidents that could affect the accurate execution of orders, in case it would be necessary to implement special or temporary measures. To this matter, no relevant incidents have occurred during the relevant period that could have affected the quality of the execution.

6. 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.



During the relevant period, BPP has given no precedence to other criteria over immediate price and cost (i.e. total consideration) when executing retail client orders on currency derivatives.
7. Explanation of how the investment firm has used any data or tools relating to the quality of execution.
<p>As stated by the European Securities and Markets Authority (hereinafter "<b>ESMA</b>"), in its document Q&amp;A on MiFID II and MiFIR investor protection and intermediaries topics (Section 1 – Best Execution, Question n° 6), recognizes that for investment firms may not be able to fully report information which is not available or applicable in relation to the preceding year in its Best Execution Reports issued in 2018.</p> <p>Since they are not yet available, BPP has not been able to rely on the reports issued by the execution venues by virtue of the Commission Delegated Regulation (EU) 2017/575 (RTS 27).</p>
8. Where applicable, an explanation of how the investment firm has used output of a consolidated tape provider.
BPP has not used output of a consolidated tape provider for the assessing the quality of order execution on currency derivatives during the relevant period.



## 6. STRUCTURED FINANCE INSTRUMENTS

1. 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.

BPP when transmitting the client orders during 2017 (hereinafter, “**relevant period**”), has taken into account the following best execution technical standards for the executed orders concerning structured finance instruments:

- Speed of execution and settlement 40%
- Price and costs 20%
- Size and type of the order 20%
- Likelihood of execution and settlement 20%

2. Description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders.

No close links, conflicts of interest and common ownerships has been identified with respect to any execution venues used to execute orders on structured finance instruments during the relevant period.

3. Description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received.

BPP does not have any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received with respect to orders on structured finance instruments.

4. 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.

No changes have been made on the list of execution venues used to execute orders on structured finance instruments during the relevant period.

5. Explanation of how order execution differs according to client categorisation, where applicable..

BPP determines the optimal result of the orders execution for retail clients on structured finance instruments in terms of total consideration, composed by the price of the financial instrument and the cost related its execution, encompassing all charges and cost incurred by the client that are directly related to the order execution, including execution venue fees, clearing and settlement fees and any other fees paid to third parties involved in executing the order.

For professional clients, BPP applies the relative weight of best execution factors set forth in point 1.

In addition, BPP has monitored the existence of any potential incidents that could affect the accurate execution of orders, in case it would be necessary to implement special or temporary measures. To this matter, no relevant incidents have occurred during the relevant period that could have affected the quality of the execution.



6. 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.

During the relevant period, BPP has given no precedence to other criteria over immediate price and cost (i.e. total consideration) when executing retail client orders on structured finance instruments.

7. Explanation of how the investment firm has used any data or tools relating to the quality of execution.

As stated by the European Securities and Markets Authority (hereinafter "**ESMA**"), in its document Q&A on MiFID II and MiFIR investor protection and intermediaries topics (Section 1 – Best Execution, Question n° 6), recognizes that for investment firms may not be able to fully report information which is not available or applicable in relation to the preceding year in its Best Execution Reports issued in 2018.

Since they are not yet available, BPP has not been able to rely on the reports issued by the execution venues by virtue of the Commission Delegated Regulation (EU) 2017/575 (RTS 27).

8. Where applicable, an explanation of how the investment firm has used output of a consolidated tape provider.

BPP has not used output of a consolidated tape provider for the assessing the quality of order execution on structured finance instruments during the relevant period.



## 7. EQUITY DERIVATIVES

1. 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.

BPP when transmitting the client orders during 2017 (hereinafter, “**relevant period**”), has taken into account the following best execution technical standards for the executed orders concerning equity derivatives:

- Speed of execution and settlement 40%
- Price and costs 20%
- Size and type of the order 20%
- Likelihood of execution and settlement 20%

2. Description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders.

No close links, conflicts of interest and common ownerships has been identified with respect to any execution venues used to execute orders on equity derivatives during the relevant period.

3. Description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received.

BPP does not have any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received with respect to orders on equity derivatives.

4. 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.

No changes have been made on the list of execution venues used to execute orders on equity derivatives during the relevant period.

5. Explanation of how order execution differs according to client categorisation, where applicable.

BPP determines the optimal result of the orders execution for retail clients on equity derivatives in terms of total consideration, composed by the price of the financial instrument and the cost related its execution, encompassing all charges and cost incurred by the client that are directly related to the order execution, including execution venue fees, clearing and settlement fees and any other fees paid to third parties involved in executing the order.

For professional clients, BPP applies the relative weight of best execution factors set forth in point 1.

In addition, BPP has monitored the existence of any potential incidents that could affect the accurate execution of orders, in case it would be necessary to implement special or temporary measures. To this matter, no relevant incidents have occurred during the relevant period that could have affected the quality of the execution.

6. 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.



During the relevant period, BPP has given no precedence to other criteria over immediate price and cost (i.e. total consideration) when executing retail client orders on equity derivatives.
7. Explanation of how the investment firm has used any data or tools relating to the quality of execution.
<p>As stated by the European Securities and Markets Authority (hereinafter "<b>ESMA</b>"), in its document Q&amp;A on MiFID II and MiFIR investor protection and intermediaries topics (Section 1 – Best Execution, Question n° 6), recognizes that for investment firms may not be able to fully report information which is not available or applicable in relation to the preceding year in its Best Execution Reports issued in 2018.</p> <p>Since they are not yet available, BPP has not been able to rely on the reports issued by the execution venues by virtue of the Commission Delegated Regulation (EU) 2017/575 (RTS 27).</p>
8. Where applicable, an explanation of how the investment firm has used output of a consolidated tape provider.
BPP has not used output of a consolidated tape provider for the assessing the quality of order execution on equity derivatives during the relevant period.





## 8. SECURITIZED DERIVATIVES

1. 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.

BPP when transmitting the client orders during 2017 (hereinafter, “**relevant period**”), has taken into account the following best execution technical standards for the executed orders concerning securitized derivatives:

- Speed of execution and settlement 40%
- Price and costs 20%
- Size and type of the order 20%
- Likelihood of execution and settlement 20%

2. Description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders.

No close links, conflicts of interest and common ownerships has been identified with respect to any execution venues used to execute orders on securitized derivatives during the relevant period.

3. Description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received.

BPP does not have any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received with respect to orders on securitized derivatives.

4. 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.

No changes have been made on the list of execution venues used to execute orders on securitized derivatives during the relevant period.

5. Explanation of how order execution differs according to client categorisation, where applicable.

BPP determines the optimal result of the orders execution for retail clients on securitized derivatives in terms of total consideration, composed by the price of the financial instrument and the cost related its execution, encompassing all charges and cost incurred by the client that are directly related to the order execution, including execution venue fees, clearing and settlement fees and any other fees paid to third parties involved in executing the order.

For professional clients, BPP applies the relative weight of best execution factors set forth in point 1.

In addition, BPP has monitored the existence of any potential incidents that could affect the accurate execution of orders, in case it would be necessary to implement special or temporary measures. To this matter, no relevant incidents have occurred during the relevant period that could have affected the quality of the execution.



6. 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.

During the relevant period, BPP has given no precedence to other criteria over immediate price and cost (i.e. total consideration) when executing retail client orders on securitized derivatives.

7. Explanation of how the investment firm has used any data or tools relating to the quality of execution.

As stated by the European Securities and Markets Authority (hereinafter "**ESMA**"), in its document Q&A on MiFID II and MiFIR investor protection and intermediaries topics (Section 1 – Best Execution, Question n° 6), recognizes that for investment firms may not be able to fully report information which is not available or applicable in relation to the preceding year in its Best Execution Reports issued in 2018.

Since they are not yet available, BPP has not been able to rely on the reports issued by the execution venues by virtue of the Commission Delegated Regulation (EU) 2017/575 (RTS 27).

8. Where applicable, an explanation of how the investment firm has used output of a consolidated tape provider.

BPP has not used output of a consolidated tape provider for the assessing the quality of order execution on securitized derivatives during the relevant period.



## 9. COMMODITIES DERIVATIVES AND EMISSION ALLOWANCES DERIVATIVES

1. 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.

BPP when transmitting the client orders during 2017 (hereinafter, “**relevant period**”), has taken into account the following best execution technical standards for the executed orders concerning commodities derivatives and emission allowances derivatives:

- Speed of execution and settlement 40%
- Price and costs 20%
- Size and type of the order 20%
- Likelihood of execution and settlement 20%

2. Description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders.

No close links, conflicts of interest and common ownerships has been identified with respect to any execution venues used to execute orders on commodities derivatives and emission allowances derivatives during the relevant period.

3. Description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received.

BPP does not have any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received with respect to orders on commodities derivatives and emission allowances derivatives.

4. 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.

No changes have been made on the list of execution venues used to execute orders on commodities derivatives and emission allowances derivatives during the relevant period.

5. Explanation of how order execution differs according to client categorisation, where applicable.

BPP determines the optimal result of the orders execution for retail clients on commodities derivatives and emission allowances derivatives in terms of total consideration, composed by the price of the financial instrument and the cost related its execution, encompassing all charges and cost incurred by the client that are directly related to the order execution, including execution venue fees, clearing and settlement fees and any other fees paid to third parties involved in executing the order.

For professional clients, BPP applies the relative weight of best execution factors set forth in point 1.

In addition, BPP has monitored the existence of any potential incidents that could affect the accurate execution of orders, in case it would be necessary to implement special or temporary measures. To this matter, no relevant incidents have occurred during the relevant period that could have affected the quality of the execution.



6. 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.

During the relevant period, BPP has given no precedence to other criteria over immediate price and cost (i.e. total consideration) when executing retail client orders on commodities derivatives and emission allowances derivatives.

7. Explanation of how the investment firm has used any data or tools relating to the quality of execution.

As stated by the European Securities and Markets Authority (hereinafter "**ESMA**"), in its document Q&A on MiFID II and MiFIR investor protection and intermediaries topics (Section 1 – Best Execution, Question n° 6), recognizes that for investment firms may not be able to fully report information which is not available or applicable in relation to the preceding year in its Best Execution Reports issued in 2018.

Since they are not yet available, BPP has not been able to rely on the reports issued by the execution venues by virtue of the Commission Delegated Regulation (EU) 2017/575 (RTS 27).

8. Where applicable, an explanation of how the investment firm has used output of a consolidated tape provider.

BPP has not used output of a consolidated tape provider for the assessing the quality of order execution on commodities derivatives and emission allowances derivatives during the relevant period.



## 10. CONTRACTS FOR DIFFERENCE

1. 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.

BPP when transmitting the client orders during 2017 (hereinafter, “**relevant period**”), has taken into account the following best execution technical standards for the executed orders concerning contracts for difference:

- Speed of execution and settlement 40%
- Price and costs 20%
- Size and type of the order 20%
- Likelihood of execution and settlement 20%

2. Description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders.

No close links, conflicts of interest and common ownerships has been identified with respect to any execution venues used to execute orders on contracts for difference during the relevant period.

3. Description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received.

BPP does not have any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received with respect to orders on contracts for difference.

4. 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.

No changes have been made on the list of execution venues used to execute orders on contracts for difference during the relevant period.

5. Explanation of how order execution differs according to client categorisation, where applicable.

BPP determines the optimal result of the orders execution for retail clients on contracts for difference in terms of total consideration, composed by the price of the financial instrument and the cost related its execution, encompassing all charges and cost incurred by the client that are directly related to the order execution, including execution venue fees, clearing and settlement fees and any other fees paid to third parties involved in executing the order.

For professional clients, BPP applies the relative weight of best execution factors set forth in point 1.

In addition, BPP has monitored the existence of any potential incidents that could affect the accurate execution of orders, in case it would be necessary to implement special or temporary measures. To this matter, no relevant incidents have occurred during the relevant period that could have affected the quality of the execution.



6. 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.

During the relevant period, BPP has given no precedence to other criteria over immediate price and cost (i.e. total consideration) when executing retail client orders on contracts for difference.

7. Explanation of how the investment firm has used any data or tools relating to the quality of execution.

As stated by the European Securities and Markets Authority (hereinafter “**ESMA**”), in its document Q&A on MiFID II and MiFIR investor protection and intermediaries topics (Section 1 – Best Execution, Question n° 6), recognizes that for investment firms may not be able to fully report information which is not available or applicable in relation to the preceding year in its Best Execution Reports issued in 2018.

Since they are not yet available, BPP has not been able to rely on the reports issued by the execution venues by virtue of the Commission Delegated Regulation (EU) 2017/575 (RTS 27).

8. Where applicable, an explanation of how the investment firm has used output of a consolidated tape provider.

BPP has not used output of a consolidated tape provider for the assessing the quality of order execution on contracts for difference during the relevant period.



## 11. EXCHANGE TRADED PRODUCTS (Exchange traded funds, Exchange traded notes and Exchange traded commodities)

1. 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.

BPP when transmitting the client orders during 2017 (hereinafter, “**relevant period**”), has taken into account the following best execution technical standards for the executed orders concerning exchange traded products:

- Speed of execution and settlement 40%
- Price and costs 20%
- Size and type of the order 20%
- Likelihood of execution and settlement 20%

2. Description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders.

No close links, conflicts of interest and common ownerships has been identified with respect to any execution venues used to execute orders on exchange traded products during the relevant period.

3. Description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received.

BPP does not have any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received with respect to orders on exchange traded products.

4. 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.

No changes have been made on the list of execution venues used to execute orders on exchange traded products during the relevant period.

5. Explanation of how order execution differs according to client categorisation, where applicable.

BPP determines the optimal result of the orders execution for retail clients on exchange traded products in terms of total consideration, composed by the price of the financial instrument and the cost related its execution, encompassing all charges and cost incurred by the client that are directly related to the order execution, including execution venue fees, clearing and settlement fees and any other fees paid to third parties involved in executing the order.

For professional clients, BPP applies the relative weight of best execution factors set forth in point 1.

In addition, BPP has monitored the existence of any potential incidents that could affect the accurate execution of orders, in case it would be necessary to implement special or temporary measures. To this matter, no relevant incidents have occurred during the relevant period that could have affected the quality of the execution.



6. 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.

During the relevant period, BPP has given no precedence to other criteria over immediate price and cost (i.e. total consideration) when executing retail client orders on exchange traded products.

7. Explanation of how the investment firm has used any data or tools relating to the quality of execution.

As stated by the European Securities and Markets Authority (hereinafter "**ESMA**"), in its document Q&A on MiFID II and MiFIR investor protection and intermediaries topics (Section 1 – Best Execution, Question n° 6), recognizes that for investment firms may not be able to fully report information which is not available or applicable in relation to the preceding year in its Best Execution Reports issued in 2018.

Since they are not yet available, BPP has not been able to rely on the reports issued by the execution venues by virtue of the Commission Delegated Regulation (EU) 2017/575 (RTS 27).

8. Where applicable, an explanation of how the investment firm has used output of a consolidated tape provider.

BPP has not used output of a consolidated tape provider for the assessing the quality of order execution on exchange traded products during the relevant period.





## 12. EMISSION ALLOWANCES

1. 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.

BPP when transmitting the client orders during 2017 (hereinafter, “**relevant period**”), has taken into account the following best execution technical standards for the executed orders concerning emission allowances:

- Speed of execution and settlement 40%
- Price and costs 20%
- Size and type of the order 20%
- Likelihood of execution and settlement 20%

2. Description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders.

No close links, conflicts of interest and common ownerships has been identified with respect to any execution venues used to execute orders on emission allowances during the relevant period.

3. Description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received.

BPP does not have any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received with respect to orders on emission allowances.

4. 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.

No changes have been made on the list of execution venues used to execute orders on emission allowances during the relevant period.

5. Explanation of how order execution differs according to client categorisation, where applicable..

BPP determines the optimal result of the orders execution for retail clients on emission allowances in terms of total consideration, composed by the price of the financial instrument and the cost related its execution, encompassing all charges and cost incurred by the client that are directly related to the order execution, including execution venue fees, clearing and settlement fees and any other fees paid to third parties involved in executing the order.

For professional clients, BPP applies the relative weight of best execution factors set forth in point 1.

In addition, BPP has monitored the existence of any potential incidents that could affect the accurate execution of orders, in case it would be necessary to implement special or temporary measures. To this matter, no relevant incidents have occurred during the relevant period that could have affected the quality of the execution.

6. 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.

During the relevant period, BPP has given no precedence to other criteria over immediate price and cost (i.e. total consideration) when executing retail client orders on emission allowances.

7. Explanation of how the investment firm has used any data or tools relating to the quality of execution.

As stated by the European Securities and Markets Authority (hereinafter "**ESMA**"), in its document Q&A on MiFID II and MiFIR investor protection and intermediaries topics (Section 1 – Best Execution, Question n° 6), recognizes that for investment firms may not be able to fully report information which is not available or applicable in relation to the preceding year in its Best Execution Reports issued in 2018.

Since they are not yet available, BPP has not been able to rely on the reports issued by the execution venues by virtue of the Commission Delegated Regulation (EU) 2017/575 (RTS 27).

8. Where applicable, an explanation of how the investment firm has used output of a consolidated tape provider.

BPP has not used output of a consolidated tape provider for the assessing the quality of order execution on emission allowances during the relevant period.



### 13. OTHER INSTRUMENTS

1. 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.

BPP when transmitting the client orders during 2017 (hereinafter, “**relevant period**”), has taken into account the following best execution technical standards for the executed orders concerning other instruments:

- Speed of execution and settlement 40%
- Price and costs 20%
- Size and type of the order 20%
- Likelihood of execution and settlement 20%

2. Description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders.

No close links, conflicts of interest and common ownerships has been identified with respect to any execution venues used to execute orders on other instruments during the relevant period.

3. Description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received.

BPP does not have any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received with respect to orders on other instruments.

4. 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.

No changes have been made on the list of execution venues used to execute orders on other instruments during the relevant period.

5. Explanation of how order execution differs according to client categorisation, where applicable.

BPP determines the optimal result of the orders execution for retail clients on other instruments in terms of total consideration, composed by the price of the financial instrument and the cost related its execution, encompassing all charges and cost incurred by the client that are directly related to the order execution, including execution venue fees, clearing and settlement fees and any other fees paid to third parties involved in executing the order.

For professional clients, BPP applies the relative weight of best execution factors set forth in point 1.

In addition, BPP has monitored the existence of any potential incidents that could affect the accurate execution of orders, in case it would be necessary to implement special or temporary measures. To this matter, no relevant incidents have occurred during the relevant period that could have affected the quality of the execution.

6. 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.

During the relevant period, BPP has given no precedence to other criteria over immediate price and cost (i.e. total consideration) when executing retail client orders on other instruments.

7. Explanation of how the investment firm has used any data or tools relating to the quality of execution.

As stated by the European Securities and Markets Authority (hereinafter "**ESMA**"), in its document Q&A on MiFID II and MiFIR investor protection and intermediaries topics (Section 1 – Best Execution, Question n° 6), recognizes that for investment firms may not be able to fully report information which is not available or applicable in relation to the preceding year in its Best Execution Reports issued in 2018.

Since they are not yet available, BPP has not been able to rely on the reports issued by the execution venues by virtue of the Commission Delegated Regulation (EU) 2017/575 (RTS 27).

8. Where applicable, an explanation of how the investment firm has used output of a consolidated tape provider.

BPP has not used output of a consolidated tape provider for the assessing the quality of order execution on other instruments during the relevant period.

## ANNEX

This report addresses the following classes of financial instruments:

- 1. Equities — Shares and Depositary Receipts**
  - i) Tick size liquidity bands 5 and 6 (from 2000 trades per day)
  - ii) Tick size liquidity bands 3 and 4 (from 80 to 1999 trades per day)
  - iii) Tick size liquidity band 1 and 2 (from 0 to 79 trades per day)
- 2. Debt instruments**
  - i) Bonds
  - ii) Money market instruments
- 3. Interest rates derivatives**
  - i) Futures and options admitted to trading on a trading venue
  - ii) Swaps, forwards, and other interest rates derivatives
- 4. Credit derivatives**
  - i) Futures and options admitted on trading on a trading venue
  - ii) Other credit derivatives
- 5. Currency derivatives**
  - i) Futures and options admitted to trading on a trading venue
  - ii) Swaps, forwards, and other currency derivatives
- 6. Structured finance instruments**
- 7. Equity Derivatives**
  - i) Options and Futures admitted to trading on a trading venue
  - ii) Swaps, forwards, and other equity derivatives
- 8. Securitized Derivatives**
  - i) Warrants and Certificate Derivatives
  - ii) Other securitized derivatives
- 9. Commodities derivatives and emission allowances Derivatives**
  - i) Options and Futures admitted to trading on a trading venue
  - ii) Other commodities derivatives and emission allowances derivatives
- 10. Contracts for difference**



11. Exchange traded products (Exchange traded funds, exchange traded notes and Exchange traded commodities)
12. Emission allowances
13. Other instruments