DMS Market Access - RTS 28

Year ending December 2018



Class of Instrument	Debt Instruments				
Notification if <1 average					
trade per business day in the	Υ				
previous year					
Top five execution venues ranked in terms of trading volumes (descending order)	percentage of total in	executed as percentage of total	Percentage of passive	aggressive	Percentage of directed orders
INTL FC Stone Financial Inc (549300LNKU6K5TJCRG93)	100%	100%	0%	100%	0%

Analysis & Conclusions - Debt Instruments

As per the Best Execution Policy of DMS Market Access (DMA) , DMA rank the factors for Fixed Income Best execution as follows

- Price
- 2) Order Size and Speed of Execution
- 3) Likelihood of Execution and Settlement
- 4) Costs

Taking the above factors into account and the average order size, pricing was always ranked as the highest factor.

DMA have no close links, conflicts of interests or common ownerships with respect to any execution venues DMA used to execute orders.

DMA have no specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received;

No changes were made to the list of execution venues listed in DMA's Best Execution Policy.

DMA order execution policies do not differ per client categorisation as DMA only execute orders for professional clients.

DMS Market Access performs periodic analysis to benchmark the quality of individual order execution.

This periodic monitoring may include the use of internal and external data sources to review factors including the price achieved and the speed of execution.

Class of Instrument	Commodity Derivative	S			
Notification if <1 average					
trade per business day in the	N				
previous year					
	Proportion of volume	Proportion of orders			
	traded as a	executed as	Percentage of	Percentage of	
Top five execution venues ranked in terms of trading volumes	percentage of total in	percentage of total	passive	aggressive	Percentage of
(descending order)	that class	in that class	orders	orders	directed orders
New York Mercantile Exchange (XNYM)	60%	60%	78%	22%	100%
	350/	24%	39%	61%	100%
ICE Futures Europe (IFEU)	25%	24%	33/0	01/0	100/6

Analysis & Conclusions - Commodity Derivatives

As per the Best Execution Policy of DMS Market Access (DMA), DMA rank the factors for FX Derivatives Best execution as follows

- Price
- 2) Order Size and Speed of Execution
- Likelihood of execution and settlement
- 4) The remaining Execution Factors Costs, nature of the order and any other consideration relevant to the execution of the order are generally given equal ranking.

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Class of Instrument	Interest Rate Derivativ	res			
Notification if <1 average					
trade per business day in the	Υ				
previous year					
	Proportion of volume	Proportion of orders			
	traded as a	executed as	Percentage of	Percentage of	
Top five execution venues ranked in terms of trading volumes	percentage of total in	percentage of total	passive	aggressive	Percentage of
(descending order)	that class	in that class	orders	orders	directed orders
Chicago Board of Trade (XCBT)	41%	30%	0%	100%	100%
EUREX Exchange (XEUR)	20%	27%	0%	100%	100%
Montreal Exchange (XMOD)	18%	15%	0%	100%	100%
ICE Futures US (IFUS)	13%	15%	0%	100%	100%
Japan Exchange Group Inc (XOSE)	8%	13%	0%	100%	100%

Analysis & Conclusions - Interest Rate Derivatives

As per the Best Execution Policy of DMS Market Access (DMA), DMA rank the factors for FX Derivatives Best execution as follows

- Price
- 2) Order Size and Speed of Execution
- 3) Likelihood of execution and settlement
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Class of Instrument	Equity Derivatives				
Notification if <1 average					
trade per business day in the	N				
previous year					
Top five execution venues ranked in terms of trading volumes (descending order)	percentage of total in	executed as	Percentage of passive	Percentage of aggressive orders	Percentage of directed orders
Chicago Mercantile Exchange (XCME)	28%	29%	0%	100%	100%
EUREX Exchange (XEUR)	21%	20%	0%	100%	100%
Euronext Derivatives Paris (XPAR)	14%	11%	0%	100%	100%
Sydney Futures Exchange (XSFE)	10%	7%	0%	100%	100%
ICE Futures US (IFUS)	7%	8%	0%	100%	100%

Analysis & Conclusions - Equity Derivatives

 $As per the \ Best \ Execution \ Policy \ of \ DMS \ Market \ Access \ (DMA) \ , DMA \ rank \ the \ factors \ for \ FX \ Derivatives \ Best \ execution \ as \ follows$

- 1) Price
- 2) Order Size and Speed of Execution
- Likelihood of execution and settlement
- 4) The remaining Execution Factors Costs, nature of the order and any other consideration relevant to the execution of the order are generally given equal ranking.

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Class of Instrument	Currency Derivatives -	i) Futures and Options a	dmitted to trading	on a trading venue	
Notification if <1 average					
trade per business day in the	N				
previous year					
	Proportion of volume	Proportion of orders			
	traded as a	executed as	Percentage of	Percentage of	
Top five execution venues ranked in terms of trading volumes	percentage of total in	percentage of total	passive	aggressive	Percentage of
(descending order)	that class	in that class	orders	orders	directed orders
Chicago Mercantile Futures Exchange (XCME)	86%	24%	0%	100%	100%
ICE Futures US (IFUS)	14%	76%	48%	52%	100%

Class of Instrument	Currency Derivatives - ii) Swaps, forwards and other currency derivatives					
Notification if <1 average						
trade per business day in the	Υ					
previous year						
	Proportion of volume	Proportion of orders				
	traded as a	executed as	Percentage of	Percentage of		
Top five execution firms ranked in terms of trading volumes	percentage of total in	percentage of total	passive	aggressive	Percentage of	
(descending order)	that class	in that class	orders	orders	directed orders	
FX ALL	100%	100%	0%	100%	0%	

Class of Instrument	Currency Derivatives - ii) Swaps, forwards and other currency derivatives					
Notification if <1 average						
trade per business day in the	Υ					
previous year						
	Proportion of volume	Proportion of orders				
	traded as a	executed as	Percentage of	Percentage of		
Top five execution firms ranked in terms of trading volumes	percentage of total in	percentage of total	passive	aggressive	Percentage of	
(descending order) via FX ALL	that class	in that class	orders	orders	directed orders	
Goldman Sachs International (W22LROWP2IHZNBB6K528)	47.49%	38.46%	0%	100%	0%	
Societe Generale (O2RNE8IBXP4R0TD8PU41)	45.95%	38.46%	0%	100%	0%	
UBS AG (BFM8T61CT2L1QCEMIK50)	6.47%	15.38%	0%	100%	0%	
Bank of New York Mellon (549300KP56LL8NKKFL47)	0.09%	7.69%	0%	100%	0%	
Dank of New York Melion (549500KP56LL8NKKFL47)	0.09%	7.09%	U%	100%	0%	

Analysis & Conclusions - Currency Derivatives
i) Futures and Options admitted to trading on a trading venue
ii) Swaps, forwards and other currency derivatives

As per the Best Execution Policy of DMS Market Access (DMA) , DMA rank the factors for FX Derivatives Best execution as follows

- 1) Price
- 2) Order Size and Speed of Execution
- 3) Likelihood of execution and settlement
- 4) The remaining Execution Factors Costs, nature of the order and any other consideration relevant to the execution of the order are generally given equal ranking.

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Class of Instrument	Equities - Shares & Depositary Receipts (i) Tick size liquidity bands 5 and 6 (from 2000 trades per day)					
Notification if <1 average						
trade per business day in the	Υ					
previous year						
	Proportion of volume	Proportion of orders				
	traded as a	executed as	Percentage of	Percentage of		
Top five execution venues ranked in terms of trading volumes	percentage of total in	percentage of total	passive	aggressive	Percentage of	
(descending order)	that class	in that class	orders	orders	directed orders	
Goldman Sachs International (W22LROWP2IHZNBB6K528)	67.00%	33.00%	0%	100%	0%	
JP Morgan Chase Bank (7H6GLXDRUGQFU57RNE97)	33.00%	67.00%	0%	100%	0%	

Analysis & Conclusions - Shares & Depositary Receipts

(i) Tick size liquidity bands 5 and 6 (from 2000 trades per day)

As per the Best Execution Policy of DMS Market Access (DMA), DMA rank the factors for Interest Rate Derivatives Best execution as follows

- Price
 Likelihood of execution and settlement
- Costs 3)
- 4) The remaining Execution Factors speed, order size, nature of the order and any other consideration relevant to the execution of the order are generally

The remaining Execution Factors - speed, order size, nature of the order and any other consideration relevant to the execution of the order - are generally given equal ranking.

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No changes were made to the list of execution venues listed in DMA's Best Execution Policy.

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DMS Market Access performs periodic analysis to benchmark the quality of individual order execution.