

Publication according Directive 2014/65/EU in financial instruments (MiFID II) Article 27(10)(b)

RTS 28 information on the top five execution venues and on the quality of execution for all executed client orders for class of financial instruments:

Annex I: Classes of financial instruments

- (A) Equities – Shares & 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)**
- (B) Debt instruments**
 - (i) **Bonds**
 - (ii) Money markets instruments
- (C) Interest rates derivatives**
 - (i) Futures and options admitted to trading on a trading venue
 - (ii) **Swaps, forwards, and other interest rates derivatives**
- (D) Credit derivatives**
 - (i) Futures and options admitted to trading on a trading venue
 - (ii) **Other credit derivatives**
- (E) Currency derivatives**
 - (i) **Futures and options admitted to trading on a trading venue**
 - (ii) **Swaps, forwards, and other currency derivatives**
- (F) Structured finance instruments
- (G) Equity derivatives**
 - (i) **Options and futures admitted to trading on a trading venue**
 - (ii) **Swaps and other equity derivatives**
- (H) Securitized derivatives
 - (i) Warrants and certificate derivatives
 - (ii) Other securitized derivatives
- (I) 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**
- (J) Contracts for difference
- (K) Exchange traded products (exchange traded funds, exchange traded notes and exchange traded commodities)**
- (L) Emission allowances
- (M) Other instruments

Qualitative Best Execution

June 2020 for the year 2019
Qualitative Best Execution Measures

Equities and Equity-like Instruments

Equity transactions are placed by Lyxor Deutschland with brokers who have access to the relevant exchanges and venues for execution, and have the expertise and the required understanding of Lyxor's trading objectives. Equity transactions are either placed with a sales trader or through electronic channels provided by the intermediary, such as through direct market access, algorithms and direct capital access.

Unless stated otherwise, across all equity products, including equity-like instruments, such as exchange traded funds (ETFs), the ranking of the execution factors is typically as follows:

- Investment objective of the underlying strategy
- Price
- Likelihood of full execution
- Speed

The remaining Execution Factors – cost (including implicit cost such as impact on the market), order size, current liquidity conditions and any other consideration relevant to the efficient execution of a Client order – are generally given equal ranking unless the investment strategy requires a different weighting.

In instances where orders exceed the volumes typically available on regulated markets, large orders (or "block trades") may be traded in over-the-counter markets, through private bilateral negotiation.

Orders sent by portfolio managers in a defined order window may be aggregated and communicated to the executing broker counterparty as a single order in accordance with formalized internal aggregation and allocation procedures, designed to ensure that all portfolios be treated fairly and equitably over time.

Fixed Income

For liquid bonds, electronic (MTF) platforms such as Bloomberg, MarketAxess or TradeWeb are generally available and provide the opportunity for simultaneous, competitive bid /offer quotes as well as request for quote (RFQ) type price discovery. Such platforms typically are the preferred venues on which to effectively execute certain types of fixed income transactions.

In general, they help to perform the price discovery function and seek best price by initiating competition among multiple independent third parties.

However, such platforms are not necessarily appropriate for transactions above a certain size or in less liquid instruments because the leakage of trade interests to the market can adversely affect the relevant pricing and inadvertently compromise the ability to obtain the best result available for the transaction.

Unless stated otherwise, across all fixed income trades the ranking of the execution factors is typically as follows:

- Investment objective of the portfolio's strategy
- Price
- Likelihood of full execution
- Settlement considerations
- Speed

For transactions which are not executed using an order book or RFQ based trading venue, Lyxor will use reasonably available and relevant sources of price discovery, including, but not limited to, market transaction prices on historical or comparable financial instruments; quotes for, or yields on, historical or a comparable financial instrument; price runs and dealer quotes. Quotes generally should be obtained from more than one counterparty as part of the price discovery process; however that is not always possible nor necessarily helpful in the process. Alternatively, Lyxor will consider on a trade by trade basis whether obtaining multiple quotes can be or should be attempted based on the security type, liquidity, size of the transaction and prevailing market

Exchange-traded Derivatives (ETDs)

ETDs are traded similarly to equities; orders are placed in the exchange order book either directly by using a counterparty's electronic channel or by sending the orders to the counterparty who then places the order in the order book.

Depending on the size, complexity, liquidity and prevailing market conditions it will be considered on a trade by trade basis whether obtaining multiple quotes can be or should be attempted

Unless stated otherwise, across all fixed income trades the ranking of the execution factors is typically as follows:

- Investment objective of the portfolio's strategy
- Price
- Likelihood of full execution
- Speed

The remaining Execution Factors – cost (including implicit cost such as impact on the market), order size, current liquidity conditions and any other consideration relevant to the efficient

Over-the-Counter (OTC) Derivatives, excluding FX

All OTC derivatives must be traded under industry legal documentation. This means the choice of counterparty for trading certain instruments such as interest rate swaps, credit default swaps, swaptions, inflation swaps, asset swaps, currency options and other more bespoke instruments can be limited to those banks where the required documentation is in place.

Similar to fixed income trading electronic (MTF) platforms are generally available for several derivatives instruments, providing the opportunity for simultaneous, competitive bid /offer quotes as well as request for quotes (RFQ) type price discovery.

For instruments where those platforms are not liquid enough or the trade specifics require a different approach the trading desk will follow a similar path as described for illiquid fixed income

Foreign Exchange (FX)

Foreign Exchange transactions can be conducted through the appointed custodian bank or third party brokers. All OTC FX derivatives must be traded under industry legal documentation with the The nature of the trade and its underlying investment strategy are significant factors in the choice of the appropriate execution strategy.

FX Execution will typically and preferably take place via electronic multibank platforms or ECN liquidity, using streaming quotes. Transactions are passed to those platforms through electronic channels where possible. Depending on the size, complexity, liquidity and prevailing market conditions Lyxor will consider on a trade by trade basis obtaining multiple quotes via electronic price

For less liquid or larger in size transactions the trading desk will use broker contacts as well as electronic tools such as RFQ platforms to search for matching liquidity or alternatively ask for capital

Unless stated otherwise, across all fixed income trades the ranking of the execution factors is typically as follows:

- Investment objective of the portfolio's strategy
- Price
- Likelihood of full execution
- Speed
- Settlement considerations

The remaining Execution Factors – cost (including implicit cost such as impact on the market), order size, current liquidity conditions and any other consideration relevant to the efficient

Ex-post review of the execution factors

From January to October 2019, Commerzbank Best Execution Framework applies: an ex-post review of the execution factors and their relative importance was conducted in the context of the

Other important information

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

Lyxor may have close links or common ownerships with respect to any execution venues used to execute orders, but there is no specific arrangements with any of these execution venues

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

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

c) 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;

N/A

d) 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

N/A

e) 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

N/A

f) an explanation of how the investment firm has used any data or tools relating to the quality of execution, including any data published under Delegated Regulation (EU) 2017/575;

N/A

g) 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.

N/A

A(i)

Information on the top five brokers

Class of Instrument	Equities - Shares & Depositary Receipts - Tick size liquidity band 5 and 6				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of volume	Proportion of volume traded as a percentage of total in that	Proportion of orders executed as percentage of total in that	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%

A(ii)

Information on the top five brokers

Class of Instrument	Equities - Shares & Depositary Receipts - Tick size liquidity band 3 and 4				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of volume	Proportion of volume traded as a percentage of total in that	Proportion of orders executed as percentage of total in that	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
ICAP Securities Limited (213800NMEZS3MD2IUP33)	67,00%	59,00%	n/a	n/a	0,00%
Commerzbank AG (851WYGNLUQLFZBSYGB56)	21,00%	21,00%	n/a	n/a	0,00%
Deutsche Bank AG (7LTFWZYICNSX8D621K86)	8,00%	14,00%	n/a	n/a	0,00%
BNP Paribas S.A. (R0MUWSPU8MPRO8K5P83)	4,00%	6,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%

A(iii)

Information on the top five brokers

Class of Instrument	Equities - Shares & Depositary Receipts - Tick size liquidity band 1 and 2				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of volume	Proportion of volume traded as a percentage of total in that	Proportion of orders executed as percentage of total in that	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Commerzbank AG (851WYGNLUQLFZBSYGB56)	86,22%	86,35%	n/a	n/a	0,00%
Canaccord Genuity Limited (ZBU7V5V5NIMN4ILRFC23)	11,40%	12,15%	n/a	n/a	0,00%
Société Générale S.A. (O2RNE8IBXP4ROTD8PU41)	2,25%	1,50%	n/a	n/a	0,00%
Steubing AG (39120043LU11WJS8IX30)	0,13%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%

B(i)

Information on the top five brokers

Class of Instrument	Debt Instruments - Bonds				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of volume	Proportion of volume traded as a percentage of total in that	Proportion of orders executed as percentage of total in that	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Commerzbank AG (851WYGNLUQLFZBSYGB56)	85,20%	85,17%	n/a	n/a	0,00%
Steubing AG (39120043LU11WJS8IX30)	14,80%	14,83%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%

B(ii)

Information on the top five brokers

Class of Instrument	Debt instruments - Money markets instruments				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of volume	Proportion of volume traded as a percentage of total in that	Proportion of orders executed as percentage of total in that	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%

C(i)

Information on the top five brokers

Class of Instrument	Interest rates derivatives - Futures and options admitted to trading on a trading venue				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of volume	Proportion of volume traded as a percentage of total in that	Proportion of orders executed as percentage of total in that	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%

C(ii)

Information on the top five brokers

Class of Instrument	Interest rates derivatives - Swaps, forwards, and other interest rates derivatives				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of volume	Proportion of volume traded as a percentage of total in that	Proportion of orders executed as percentage of total in that	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Barclays Bank Ireland Plc (2G5BKIC2CB69PRJH1W31)	87,00%	76,00%	n/a	n/a	0,00%
Deutsche Bank AG (7LTFWFZYICNSX8D621K86)	13,00%	24,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%

D(ii)

Information on the top five brokers

Class of Instrument	Credit derivatives - Other credit derivatives				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of volume	Proportion of volume traded as a percentage of total in that	Proportion of orders executed as percentage of total in that	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Commerzbank AG (851WYGNLUQLFZBSYGB56)	100,00%	100,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%

E(i)

Information on the top five brokers

Class of Instrument	Currency derivatives - Futures and options admitted to trading on a trading venue				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of volume	Proportion of volume traded as a percentage of total in that	Proportion of orders executed as percentage of total in that	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Barclays Bank Ireland Plc (2G5BKIC2CB69PRJH1W31)	100,00%	100,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%

E(ii)

Information on the top five brokers

Class of Instrument	Currency derivatives - Swaps, forwards, and other currency derivatives				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of volume	Proportion of volume traded as a percentage of total in that	Proportion of orders executed as percentage of total in that	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
BofA Securities Europe S.A. (549300FH0WJAPEHTIQ77)	63,82%	13,73%	n/a	n/a	0,00%
JP Morgan Securities plc. (K6Q0W1PS1L1O4IQ9C32)	22,08%	30,40%	n/a	n/a	0,00%
Goldman Sachs International (W22LROWP2IHZNBB6K528)	12,40%	11,28%	n/a	n/a	0,00%
Commerzbank AG (851WYGNLUQLFZBSYGB56)	1,55%	41,18%	n/a	n/a	0,00%
BNP Paribas S.A. (ROMUWSFPU8MPRO8K5P83)	0,15%	3,42%	n/a	n/a	0,00%

F

Information on the top five brokers

Class of Instrument	Structured finance instruments				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of volume	Proportion of volume traded as a percentage of total in that	Proportion of orders executed as percentage of total in that	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%

G(i)

Information on the top five brokers

Class of Instrument	Equity Derivatives - Options and futures admitted to trading on a trading venue				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of volume	Proportion of volume traded as a percentage of total in that	Proportion of orders executed as percentage of total in that	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Barclays Bank Ireland Plc (2G5BKIC2CB69PRJH1W31)	76,83%	74,97%	n/a	n/a	0,00%
Steubing AG (39120043LU11WJS8IX30)	23,17%	25,03%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%

G(ii)

Information on the top five brokers

Class of Instrument	Equity Derivatives - Swaps and other equity derivatives				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of volume	Proportion of volume traded as a percentage of total in that	Proportion of orders executed as percentage of total in that	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Goldman Sachs International (W22LROWP2IHZNBB6K528)	57,00%	39,00%	n/a	n/a	0,00%
Barclays Bank Ireland Plc (2G5BKIC2CB69PRJH1W31)	25,00%	44,00%	n/a	n/a	0,00%
Deutsche Bank AG (7LTFWZYICNSX8D621K86)	10,00%	9,00%	n/a	n/a	0,00%
BNP Paribas S.A. (R0MUWSPU8MPRO8K5P83)	7,00%	8,00%	n/a	n/a	0,00%
Commerzbank AG (851WYGNLUQLFZBSYGB56)	1,00%	0,00%	n/a	n/a	0,00%

H(i)

Information on the top five brokers

Class of Instrument	Scuritized Derivatives - Warrants and certificate derivatives				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of volume	Proportion of volume traded as a percentage of total in that	Proportion of orders executed as percentage of total in that	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%

H(ii)

Information on the top five brokers

Class of Instrument	Securitized Derivatives - Other securitized derivatives				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of volume	Proportion of volume traded as a percentage of total in that	Proportion of orders executed as percentage of total in that	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%

I(i)

Information on the top five brokers

Class of Instrument	Commodities derivatives and emission allowances Derivatives - Options and futures admitted to trading on a trading venue				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of volume	Proportion of volume traded as a percentage of total in that	Proportion of orders executed as percentage of total in that	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%

I(ii)

Information on the top five brokers

Class of Instrument	Commodities derivatives and emission allowances Derivatives - Other commodities derivatives and emission allowances derivatives				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of volume	Proportion of volume traded as a percentage of total in that	Proportion of orders executed as percentage of total in that	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Barclays Bank Ireland Plc (2G5BKIC2CB69PRJH1W31)	100,00%	100,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%

J

Information on the top five brokers

Class of Instrument	Contracts for difference				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of volume	Proportion of volume traded as a percentage of total in that	Proportion of orders executed as percentage of total in that	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%

K

Information on the top five brokers

Class of Instrument	Exchange traded products (Exchange traded funds, exchange traded notes and exchange traded commodities)				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of volume	Proportion of volume traded as a percentage of total in that	Proportion of orders executed as percentage of total in that	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Commerzbank AG (851WYGNLUQLFZBSYGB56)	35,20%	81,68%	n/a	n/a	0,00%
Canaccord Genuity Limited (ZBU7V5V5NIMN4ILRFC23)	29,12%	4,45%	n/a	n/a	0,00%
Société Générale S.A. (O2RNE8IBXP4ROTD8PU41)	22,22%	11,78%	n/a	n/a	0,00%
Goldman Sachs International (W22LROWP2IHZNBB6K528)	9,10%	1,31%	n/a	n/a	0,00%
JP Morgan Securities plc. (K6Q0W1PS1L1O4IQL9C32)	4,36%	0,79%	n/a	n/a	0,00%

L

Information on the top five brokers

Class of Instrument	Emission allowances				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of volume	Proportion of volume traded as a percentage of total in that	Proportion of orders executed as percentage of total in that	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%

M

Information on the top five brokers

Class of Instrument	Other instruments				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of volume	Proportion of volume traded as a percentage of total in that	Proportion of orders executed as percentage of total in that	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%
n/a	0,00%	0,00%	n/a	n/a	0,00%

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