

1/5 **Information on top five execution brokers and quality of execution as per 2014/65/EU and RTS n. 28 of 8.6.2016 (reference period 2018)**

Best Execution is a set of arrangements and procedures implemented by Vontobel Asset Management SA Milan Branch (VAMSA Milan) so as to ensure the best possible result for its clients, when transmitting to third parties (executing brokers) orders in financial instruments on behalf of its clients (belonging exclusively to the category of “professional” client).

The top five execution brokers and trading volumes are reported in Annex 1 in accordance to the format set out in Table 2 of Annex II of RTS 28 (“Commission Delegated Regulation of 08.06.2016”).

In order to achieve the best possible result for its clients VAMSA Milan takes into account the following factors. The main factors taken into consideration by VAMSA Milan to define its strategy for the transmission of orders and thus ensure the best possible result are as follows:

- The total fee, composed of the price of the financial instrument and the costs of execution borne by the client and directly connected with the execution of the order;
- The speed of execution;
- The probability of execution;
- The probability of settlement;
- The size of the order;
- The nature of the order;
- And other significant factors for the execution of the order.

In defining the factors considered above, VAMSA Milan assumes that the client’s primary interest is to achieve the best possible price for the order attributed to it, taking into consideration all the costs of the transaction. It is also assumed to be in the client’s interest if the change in market prices is not detrimental thereto, and so the market is also selected depending on the probability of total execution of the order over a short period of time. Other aspects examined for the purposes of assessing the aforesaid factors are the liquidity of the place of execution to which the trader has access, the possibility of the trader using automatic devices for connecting the places of execution such as to eliminate the manual handling of orders, and the number of places of execution to which the traders have access.

2/5 In order to establish the relative importance of the afore said factors, VAMSA Milan takes the following criteria into account:

- The characteristics of the client, including its classification;
- The characteristics of the order;
- The characteristics of the financial instruments forming the subject of the order;
- The characteristics of the places of execution to which the order may be sent.

With each broker VAMSA Milan trades a main class of financial instrument (Equity, Bond, ETF, Derivatives) chosen on the basis of the special expertise offered on that segment in terms of, mainly, quality of trading and fees.

Following brokers are considered for different classes of financial instruments.

Cash equities and equity-likes (Shares, exchange-traded funds, certificates and other similar financial instruments) VAMSA Milan takes into consideration a range of different factors to determine the manner in which the order will be transmitted. VAMSA Milan considers the following factors in order of importance:

Importance: High

- Total fee
- Size and nature of the order
- Likelihood of execution

Generally speaking, price and size are the key execution factors when placing an order.

Importance: Medium

- Speed
- Costs

Importance: Low

- Likelihood of settlement
- Any other factors relevant to the efficient execution of the order

When providing portfolio management, VAMSA Milan usually transmits orders to the following investment firms: **UBS Ltd Londra, MORGAN STANLEY, Societe Generale, Intermonte SIM, Credit Suisse, Exane and Banca IMI.**

Debt instruments (Bonds, structured finance products, emission allowances)

VAMSA Milan takes into consideration a range of different factors to determine the manner in which the order will be transmitted. VAMSA Milan considers the following factors in order of importance:

Importance: High

- Total fee
- Size and nature of the order
- Likelihood of execution

Generally speaking, price is the key execution factor when placing an order.

3/5 **Importance: Medium**

- Speed
- Costs

Importance: Low

- Likelihood of settlement
- Any other factors relevant to the efficient execution of the order

When providing portfolio management, VAMSA Milan usually transmits orders to the following investment firms: **BANCA IMI, MITSUBISHI, JP MORGAN SECURITIES PLC London Branch, Banca Akros, Société Générale, Toronto Dominion Bank and Octo Finances.**

Derivatives (ETD and OTC)

VAMSA Milan takes into consideration a range of different factors to determine the manner in which the order will be transmitted. VAMSA Milan considers the following factors in order of importance:

Importance: High

- Total fee
- Size and nature of the order
- Likelihood of execution

Generally speaking, price is the key execution factor when placing an order.

Importance: Medium

- Speed
- Costs

Importance: Low

- Likelihood of settlement
- Any other factors relevant to the efficient execution of the order

When providing portfolio management, VAMSA Milan usually transmits orders to the following investment firms: **JP MORGAN SECURITIES PLC London Branch, Banca IMI and Société Générale.**

In respect of the above reported brokers there is not a situation of close links or common ownership with the exclusion of the broker Bank Vontobel which is part of the Group to which VAMSA Milan belongs.

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Annex 1

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(a)	(b)		(c)	(d)	(e)		(f)	(g)
	Broker's name	Identifier			Passive	Aggressive		
A3	UBS Ltd Londra	REYPIEJN7XZHSUI0N355	29%	32%	N/A	N/A	0%	L
A3	MORGAN STANLEY	I3V0QMU25665KBGBGX85	29%	27%	N/A	N/A	0%	L
A3	SOCIETE GENERALE	O2RNE8IBXP4R0TD8PU41	28%	29%	N/A	N/A	0%	L
A3	BANK VONTOBEL AG ZURICH	549300L7V4MGECYRM576	15%	12%	N/A	N/A	0%	L
B1	BANCA IMI	QV4Q8OGJ7OA6PA8SCM14	75%	62%	N/A	N/A	0%	L
B1	MITSUBISHI	213800ZXJ3S6VKHTX31	14%	27%	N/A	N/A	0%	L
B1	SOCIETE GENERALE	O2RNE8IBXP4R0TD8PU41	4%	5%	N/A	N/A	0%	L
B1	JP MORGAN SECURITIES PLC, London Branch	K6Q0W1PS1L1O4IQL9C32	5%	5%	N/A	N/A	0%	L
B1	BANK VONTOBEL AG ZURICH	549300L7V4MGECYRM576	2%	1%	N/A	N/A	0%	L
E1	BANK VONTOBEL AG ZURICH	549300L7V4MGECYRM576	100%	100%	N/A	N/A	0%	L
E2	JP MORGAN SECURITIES PLC, London Branch	K6Q0W1PS1L1O4IQL9C32	100%	100%	N/A	N/A	0%	L
G1	BANK VONTOBEL AG ZURICH	549300L7V4MGECYRM576	100%	100%	N/A	N/A	0%	L
K1	BANK VONTOBEL AG ZURICH	549300L7V4MGECYRM576	49%	20%	N/A	N/A	0%	L
K1	INTERMONTE SIM	YMUU1WGHJKORF9E36I98	20%	42%	N/A	N/A	0%	L
K1	SOCIETE GENERALE	O2RNE8IBXP4R0TD8PU41	18%	9%	N/A	N/A	0%	L
K1	BANCA IMI	QV4Q8OGJ7OA6PA8SCM14	12%	25%	N/A	N/A	0%	L
K1	CREDIT SUISSE	DL6FFRRLF74S01HE2M14	1%	4%	N/A	N/A	0%	L

Description of columns

- (a) class of financial instruments, please refer to Annex 2;
- (b) broker's name and identifier;
- (c) volume of client orders executed expressed as a percentage of total executed volume;
- (d) number of client orders executed expressed as a percentage of total executed orders;
- (e) percentage of the executed orders referred to in point (d) that were passive and aggressive orders;
- (f) percentage of orders referred to in point (d) that were directed orders;
- (g) confirmation of whether it has executed an average of less than one trade per business day in the previous year in that class of financial instruments ("L" means less; "M" means more).

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Annex 2

- (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