

RTS 28 for Jan-Dec 2019 - Instinet Europe Limited



Overall Summary:

For a detailed description of execution arrangements used by Instinet Europe Limited ('Instinet'), see our Order Execution Policy:

<https://instinet.com/legal-regulatory>

This document shows Instinet's top five venues and brokers for each class of instrument, along with summaries for each class.

Regarding the specific clauses a-h of Article 3 (3) of RTS 28, the following information is common to all classes of financial instruments traded by Instinet:

(a) an explanation of the relative importance the firm gave to the execution factors of price, costs, speed, likelihood of execution or any other consideration including qualitative factors when assessing the quality of execution;	When selecting venues on which to place orders, Instinet generally puts the greatest emphasis on price above other factors, followed by likelihood of execution. Instinet has established a set of processes and procedures to monitor execution quality. The Best Execution Committee undertakes regular reviews, usually on a quarterly basis, to scrutinize the performance of Instinet's execution mechanisms. The Best Execution Working Group meets frequently, usually weekly, to assess order execution and discuss enhancements.
(b) a description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders;	When assessing the executions, Instinet's Best Execution Committee and Working Group use quantitative and qualitative metrics to assess venues and brokers, and also reviews performance of the SOR, the Experts algorithm suite and orders worked by Instinet's Execution desk. Metrics used include analysis of spread moves at time intervals after fills on different venues, comparison of prices achieved by the SOR with the consolidated lit orderbook at the time of sending, and performance of algos against a range of benchmarks including arrival, close and VWAP. Instinet may use the execution venues listed in the Appendices to the Order Execution Policy when obtaining best execution. Instinet is wholly owned by Nomura Holdings Inc and as such has close links with other legal entities within the Nomura Holdings Inc Group. Where Instinet routes a qualifying order to an affiliate for execution, Instinet will ensure that the latter will have regard for the wider market in the relevant security, taking into account information source reasonably available, including but not limited to exchanges, brokers/dealers and multi-lateral trading facilities in order for Instinet to meet its best execution obligation. Instinet owns and operates BlockMatch MTF. The rulebook and membership details for BlockMatch are available on www.blockmatch.com Instinet is a member of the Plato Partnership which is part of a joint venture with Turquoise, an MTF operator.
(c) a description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received;	Instinet has no specific arrangements with any execution venues other than the standard terms of membership where applicable. When trading with a Systematic Internaliser, no payment is made or received.

(d) an explanation of the factors that led to a change in the list of execution venues listed in the firm's execution policy, if such a change occurred;	<p>In 2019, Instinet made numerous changes to the list of default SIs with whom electronic orders interact, based on data assessment.</p> <p>Instinet developed an SI scoring system which aims to select the feeds which help to minimise market impact and provide valuable extra liquidity. Scores must be consistent over a rolling four week period.</p> <p>Based on these criteria, SI feeds from Jump Trading, Virtu Financial, IMC, XTX and Tower Research were added, and feeds from Jump Trading, Virtu Financial and Hudson River were removed from the default list during the course of the year.</p> <p>Venues added during 2019, but not included in default electronic routing due to lack of liquidity: CBOE Europe DXE books, Aquis Auction on Demand, UBS MTF Periodic Auction, and some further small-cap market segments.</p> <p>Venues removed during 2019 as they ceased operations: Euronext Block, IMC.</p> <p>An up-to-date list of all venues accessed, including those accessed by default electronically, can be found at https://instinet.com/sites/default/files/public/documents/IEL_OEP_Appendix_EMEA_Venues_Mar_20.xlsx</p>
(e) an explanation of how order execution differs according to client categorisation, where the firm treats categories of clients differently and where it may affect the order execution arrangements;	<p>Instinet deals only with professional clients and eligible counterparties and otherwise does not categorise clients. However we classify orders according to the product used: DEA orders, Algo orders, Worked orders, and Broker-Neutral orders</p> <p>Descriptions of each of these order categories and their execution arrangements can be found in our Order Execution Policy.</p>
(f) an explanation of whether other criteria were given precedence over immediate price and cost when executing retail client orders and how these other criteria were instrumental in delivering the best possible result in terms of the total consideration to the client;	<p>Instinet does not have any retail clients.</p>
(g) an explanation of how the investment firm has used any data or tools relating to the quality of execution, including any data published under RTS 27:	<p>Instinet's Best Execution Committee and Working Group assess execution quality using a variety of metrics depending on the order type, as described under answer (a) above.</p> <p>Instinet sources raw data directly from exchanges in most cases and maintains its own tick database. In the few EEA markets where Instinet is not a member firm this data is sourced from Bloomberg.</p>
(h) where applicable, an explanation of how the investment firm has used output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU.	<p>Instinet uses consolidated data stored in a proprietary database.</p>

Top 5 Venues: Small caps, Traded on a Trading Venue						
Class of Instrument		Equities - Shares and Depositary Receipts: Tick size liquidity bands 1 and 2				
Notification if <1 average trade per business day in the previous year		No				
Top five execution venues ranked in terms of traded volumes (descending order)	MIC	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
EURONEXT - EURONEXT AMSTERDAM	XAMS	1.0%	0.4%	54%	41%	55%
CBOE EUROPE - CXE ORDER BOOKS	CHIX	0.5%	0.6%	61%	22%	74%
SIX SWISS EXCHANGE - BLUE CHIPS SEGMENT	XVTX	0.5%	0.1%	50%	22%	58%
SIX SWISS EXCHANGE	XSWX	0.5%	0.3%	55%	25%	47%
LONDON STOCK EXCHANGE	XLON	0.4%	0.4%	45%	31%	64%

Top 5 Brokers: Small caps, Traded on a Trading Venue						
Class of Instrument		Equities - Shares and Depositary Receipts: Tick size liquidity bands 1 and 2				
Notification if <1 average trade per business day in the previous year		No				
Top five brokers ranked in terms of traded volumes (descending order)	LEI	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Instinet, LLC	549300MGMN3RKMU8FT57	64.4%	69.6%	25%		
Instinet Pacific Ltd	549300RI6VZUNIR81J81	22.9%	17.5%	8%		
Instinet Australia Pty Ltd	5493000V6EFTSRJ06G76	1.4%	3.4%	0%		
Instinet Canada Ltd	549300SU730FTQOKTE75	1.3%	1.4%	0%		
SBG Securities (Pty) Ltd	378900E04C570BD2FB77	0.7%	0.7%	47%		

Many non-EEA securities are admitted to trading in the EEA and hence are classified as MiFID securities.

Where the most liquid market for a security is outside the EEA, Instinet may execute on that market, subject to the Share Trading Obligation, in order to meet Best Execution requirements.

In some cases information relating to passive and aggressive orders is missing, including for venues that do not publish Last Liquidity information.

To assist clients in understanding where their orders are routed, we have included the following additional tables and summaries, filtered on securities listed on EEA venues only.

Top 5 Venues: Small caps, EEA Listings only						
Class of Instrument		Equities - Shares and Depositary Receipts: Tick size liquidity bands 1 and 2				
Notification if <1 average trade per business day in the previous year		No				
Top five execution venues ranked in terms of traded volumes (descending order)		MIC	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders
EURONEXT - EURONEXT AMSTERDAM	XAMS		23.8%	10.1%	53%	42%
XETRA - REGULIERTER MARKT	XETA		9.8%	7.0%	53%	37%
CBOE EUROPE - CXE ORDER BOOKS	CHIX		8.2%	12.5%	63%	23%
LONDON STOCK EXCHANGE	XLON		6.3%	9.4%	46%	30%
CBOE EUROPE - BXE ORDER BOOKS	BATE		4.3%	10.0%	73%	15%
						87%

When limiting data to EEA listings only, the top 5 venues are no longer dominated by Switzerland.

Auction trading represents the remaining percentage after passive and aggressive orders; these are typically much larger size than continuous orders.

Top 5 Brokers: Small caps, EEA Listings only				
Class of Instrument		Equities - Shares and Depositary Receipts: Tick size liquidity bands 1 and 2		
Notification if <1 average trade per business day in the previous year		No		
Top five brokers ranked in terms of traded volumes (descending order)		LEI	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class
Virtu ITG Europe Ltd	213800EEC95PRUCEUP63		2.2%	0.8%
Morgan Stanley & Co. International Plc	4PQUHN3JPFGNF3BB653		0.9%	0.9%
Liquidnet Europe Ltd	213800ZIRB79BE5XQM68		0.8%	0.1%
Joh. Berenberg, Gossler & Co. KG	529900UC2OD7II24Z667		0.8%	0.0%
Banco Santander, S.A.	5493006QMFDDMYWIAM13		0.4%	1.1%
				17%

Instinet is a member of most major European exchanges except Bolsa de Madrid, hence the overall percentage of flow routed to brokers is very low.

Virtu ITG and Liquidnet are used as DEA brokers when accessing their MTFs, ITG POSIT and Liquidnet Blocks.

Santander is used as a DEA broker to access Bolsa de Madrid.

Joh. Berenberg, Gossler & Co. KG is used as a broker for UK small cap stocks where liquidity is supported by market makers.

Certain Instinet clients direct orders to Morgan Stanley.

Top 5 Venues: Mid caps, Traded on a Trading Venue						
Class of Instrument		Equities - Shares and Depositary Receipts: Tick size liquidity bands 3 and 4				
Notification if <1 average trade per business day in the previous year		No				
Top five execution venues ranked in terms of traded volumes (descending order)	MIC	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
LONDON STOCK EXCHANGE	XLON	10.0%	10.7%	54%	25%	75%
CBOE EUROPE - CXE ORDER BOOKS	CHIX	8.1%	15.7%	62%	24%	76%
XETRA - REGULIERTER MARKT	XETA	8.0%	6.1%	59%	27%	76%
SIX SWISS EXCHANGE - BLUE CHIPS SEGMENT	XVTX	5.6%	2.0%	50%	11%	54%
EURONEXT - EURONEXT PARIS	XPAR	5.3%	3.7%	49%	33%	53%

Top 5 Brokers: Mid caps, Traded on a Trading Venue						
Class of Instrument		Equities - Shares and Depositary Receipts: Tick size liquidity bands 3 and 4				
Notification if <1 average trade per business day in the previous year		No				
Top five brokers ranked in terms of traded volumes (descending order)	LEI	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Instinet, LLC	549300MGMN3RKMU8FT57	5.0%	2.7%	15%		
Morgan Stanley & Co. International Plc	4PQUHN3JPFGFNF3BB653	2.5%	3.6%	100%		
Virtu ITG Europe Ltd	213800EEC95PRUCEUP63	1.4%	0.4%	8%		
Banco Santander, S.A.	5493006QMFDDDMYWIAM13	1.0%	1.4%	18%		
Instinet Pacific Ltd	549300RI6VZUNIR81J81	0.9%	0.6%	3%		

Many non-EEA securities are admitted to trading in the EEA and hence are classified as MiFID securities.

Where the most liquid market for a security is outside the EEA, Instinet may execute on that market, subject to the Share Trading Obligation, in order to meet Best Execution requirements.

In some cases information relating to passive and aggressive orders is missing, including for venues that do not publish Last Liquidity information.

To assist clients in understanding where their orders are routed, we have included the following additional tables and summaries, filtered on securities listed on EEA venues only.

Top 5 Venues: Mid caps, EEA Listings only						
Class of Instrument		Equities - Shares and Depositary Receipts: Tick size liquidity bands 3 and 4				
Notification if <1 average trade per business day in the previous year		No				
Top five execution venues ranked in terms of traded volumes (descending order)	MIC	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
XETRA - REGULIERTER MARKT	XETA	11.0%	7.6%	59%	27%	76%
LONDON STOCK EXCHANGE	XLON	10.6%	10.5%	58%	26%	74%
CBOE EUROPE - CXE ORDER BOOKS	CHIX	8.8%	16.9%	63%	25%	75%
EURONEXT - EURONEXT PARIS	XPAR	7.3%	4.6%	49%	33%	53%
CBOE EUROPE - BXE ORDER BOOKS	BATE	5.2%	9.3%	63%	18%	86%

When limiting data to EEA listings only, Xetra moves ahead of CXE due to the effect of filtering out trades in Swiss-listed securities prior to equivalence being suspended on 1st July 2019.

A high percentage of Instinet's executions in this category were from directed orders, highlighting Instinet's position as a DEA broker and connectivity provider.

Instinet's algos and DEA clients typically place more passive orders than aggressive orders; this is especially the case on MTFs.

The volume-to-executions ratio on Regulated Markets is much higher than on MTFs, mainly due to high-value auction trades.

Top 5 Brokers: Mid caps, EEA Listings only				
Class of Instrument		Equities - Shares and Depositary Receipts: Tick size liquidity bands 3 and 4		
Notification if <1 average trade per business day in the previous year		No		
Top five brokers ranked in terms of traded volumes (descending order)	LEI	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of directed orders
Morgan Stanley & Co. International Plc	4PQUHN3JPFGFNF3BB653	2.5%	3.6%	100%
Virtu ITG Europe Ltd	213800EEC95PRUCEUP63	1.7%	0.4%	8%
Banco Santander, S.A.	5493006QMFDDMYWIAM13	1.3%	1.7%	18%
Liquidnet Europe Ltd	213800ZIRB79BE5XQM68	0.5%	0.0%	0%
Piraeus Securities SA	213800I9XHTVLX73Z109	0.3%	0.3%	37%

Instinet is a member of most major European exchanges except Bolsa de Madrid, hence the overall percentage of flow routed to brokers is very low.

Certain Instinet clients direct orders to Morgan Stanley.

Santander is used as a DEA broker to access Bolsa de Madrid.

Piraeus Securities SA is used as a broker in Greek equities.

Virtu ITG and Liquidnet are used as DEA brokers when accessing their MTFs, ITG POSIT and Liquidnet Blocks.

Top 5 Venues: Large caps, Traded on a Trading Venue						
Class of Instrument		Equities - Shares and Depositary Receipts: Tick size liquidity bands 5 and 6				
Notification if <1 average trade per business day in the previous year		No				
Top five execution venues ranked in terms of traded volumes (descending order)	MIC	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
LONDON STOCK EXCHANGE	XLON	13.7%	12.8%	62%	25%	79%
CBOE EUROPE - CXE ORDER BOOKS	CHIX	11.9%	24.4%	70%	17%	68%
XETRA - REGULIERTER MARKT	XETA	9.8%	5.6%	63%	27%	78%
EURONEXT - EURONEXT PARIS	XPAR	6.9%	3.6%	57%	31%	65%
BLOCKMATCH MTF RFQ	BRFQ	4.6%	3.8%	48%	52%	53%

Top 5 Brokers: Large caps, Traded on a Trading Venue						
Class of Instrument		Equities - Shares and Depositary Receipts: Tick size liquidity bands 5 and 6				
Notification if <1 average trade per business day in the previous year		No				
Top five brokers ranked in terms of traded volumes (descending order)	LEI	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Instinet, LLC	549300MGMN3RKMU8FT57	5.7%	5.0%	34%		
Morgan Stanley & Co. International Plc	4PQUHN3JPFGFNF3BB653	2.8%	4.0%	100%		
Banco Bilbao Vizcaya Argentaria	K8MS7FD7N5Z2WQ51AZ71	1.8%	1.8%	89%		
Virtu ITG Europe Ltd	213800EEC95PRUCEUP63	0.9%	0.2%	12%		
Banco Santander, S.A.	5493006QMFDMDYWIAM13	0.6%	0.4%	41%		

Many non-EEA securities are admitted to trading in the EEA and hence are classified as MiFID securities.

Where the most liquid market for a security is outside the EEA, Instinet may execute on that market, subject to the Share Trading Obligation, in order to meet Best Execution requirements.

In some cases information relating to passive and aggressive orders is missing, including for venues that do not publish Last Liquidity information.

To assist clients in understanding where their orders are routed, we have included the following additional tables and summaries, filtered on securities listed on EEA venues only.

Top 5 Venues: Large caps, EEA Venues only						
Class of Instrument		Equities - Shares and Depositary Receipts: Tick size liquidity bands 5 and 6				
Notification if <1 average trade per business day in the previous year		No				
Top five execution venues ranked in terms of traded volumes (descending order)	MIC	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
LONDON STOCK EXCHANGE	XLON	14.2%	12.6%	65%	25%	79%
CBOE EUROPE - CXE ORDER BOOKS	CHIX	13.3%	27.0%	71%	17%	68%
XETRA - REGULIERTER MARKT	XETA	11.7%	6.4%	63%	27%	78%
EURONEXT - EURONEXT PARIS	XPAR	8.3%	4.1%	57%	31%	66%
BLOCKMATCH MTF RFQ	BRFQ	5.2%	4.2%	48%	52%	53%

A high percentage of Instinet's executions in this category were from directed orders, highlighting Instinet's position as a DEA broker and connectivity provider.

Instinet's algos and DEA clients typically place more passive orders than aggressive orders; this is especially the case on MTFs.

The volume-to-executions ratio on Regulated Markets is much higher than on MTFs, mainly due to high-value auction trades.

Instinet uses BlockMatch RFQ as a venue for finding bilateral matches between all types of counterparties and for concluding block trades on exchange.

Top 5 Brokers: Large caps, EEA Venues only				
Class of Instrument		Equities - Shares and Depositary Receipts: Tick size liquidity bands 5 and 6		
Notification if <1 average trade per business day in the previous year		No		
Top five brokers ranked in terms of traded volumes (descending order)	LEI	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of directed orders
Morgan Stanley & Co. International Plc	4PQUHN3JPFGNF3BB653	3.1%	4.3%	100%
Banco Bilbao Vizcaya Argentaria	K8MS7FD7N5Z2WQ51AZ71	2.2%	2.1%	89%
Virtu ITG Europe Ltd	213800EEC95PRUCEUP63	1.0%	0.2%	12%
Banco Santander, S.A.	5493006QMFDMDYWIAM13	0.8%	0.4%	41%
Liquidnet Europe Ltd	213800ZIRB79BE5XQM68	0.3%	0.0%	0%

Instinet is a member of most major European exchanges except Bolsa de Madrid, hence the overall percentage of flow routed to brokers is very low.

Certain Instinet clients direct orders to Morgan Stanley.

Santander and BBVA are DEA brokers used to access Bolsa de Madrid.

Virtu ITG and Liquidnet are used as DEA brokers when accessing their MTFs, ITG POSIT and Liquidnet Blocks.

Top 5 Venues: ETPs, Traded on a Trading Venue						
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	No					
Top five execution venues ranked in terms of traded volumes (descending order)	MIC	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
LONDON STOCK EXCHANGE	XLON	14.6%	12.0%	27%	68%	52%
XETRA - REGULIERTER MARKT	XETA	8.7%	6.0%	32%	57%	56%
ELECTRONIC ETF, ETC/ETN AND OPEN-END FUNDS MARKET	ETFP	7.4%	5.1%	32%	67%	68%
SIX SWISS EXCHANGE	XSWX	5.2%	6.9%	66%	28%	89%
EURONEXT - Euronext Paris	XPAR	2.7%	2.6%	29%	61%	29%

Top 5 Brokers: ETPs, Traded on a Trading Venue						
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	No					
Top five brokers ranked in terms of traded volumes (descending order)	LEI	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of directed orders		
Instinet, LLC	549300MGMN3RKMU8FT57	46.3%	53.7%	6%		
Instinet Pacific Ltd	549300RI6VZUNIR81J81	2.0%	2.6%	1%		
Jane Street Financial Ltd	549300ZHEHX8M31RP142	1.6%	0.0%	0%		
Flow Traders BV	549300CLJI9XDH12XV51	1.5%	0.0%	0%		
Banco Santander, S.A.	5493006QMFDDMYWIAM13	1.3%	1.2%	99%		

Many non-EEA securities are admitted to trading in the EEA and hence are classified as MiFID securities.

Where the most liquid market for a security is outside the EEA, Instinet may execute on that market, subject to the Share Trading Obligation, in order to meet Best Execution requirements.

In some cases information relating to passive and aggressive orders is missing, including for venues that do not publish Last Liquidity information.

To assist clients in understanding where their orders are routed, we have included the following additional tables and summaries, filtered on securities listed on EEA venues only.

Top 5 Venues: ETPs, EEA Venues only						
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		No				
Top five execution venues ranked in terms of traded volumes (descending order)		MIC	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders
LONDON STOCK EXCHANGE	XLON	29.8%	29.0%	26%	69%	52%
XETRA - REGULIERTER MARKT	XETA	18.3%	14.8%	32%	57%	56%
ELECTRONIC ETF, ETC/ETN AND OPEN-END FUNDS MARKET	ETFP	15.2%	12.5%	32%	67%	69%
SIX SWISS EXCHANGE	XSWX	6.6%	11.8%	69%	25%	91%
EURONEXT - EURONEXT PARIS	XPAR	5.6%	6.5%	29%	61%	29%

In contrast to Shares, Instinet's clients and algos typically place more aggressive orders than passive orders in Exchange Traded Products.

Top 5 Brokers: ETPs, EEA Venues only						
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		No				
Top five brokers ranked in terms of traded volumes (descending order)		LEI	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of directed orders	
Jane Street Financial Ltd	549300ZHEHX8M31RP142	3.3%	0.0%	0%	0%	
Flow Traders BV	549300CLJI9XDH12XV51	3.0%	0.0%	0%	0%	
Banco Santander, S.A.	5493006QMFDDMYWIAM13	2.7%	3.1%	99%		
Nomura International Plc	DGQCSV2PHVF7I274359	1.2%	0.0%	100%		
Susquehanna International Group Ltd	549300UV4DM2KIBBQ741	0.3%	0.0%	0%		

Instinet is a member of most major European exchanges except Bolsa de Madrid, so the overall percentage of flow routed to brokers is very low.

Santander is used as a DEA broker to access Bolsa de Madrid.

Jane Street, Flow Traders and Susquehanna are ETF Market-makers, used for OTC executions for some illiquid or high volume trades.

Nomura were used as executing broker for a small number of high volume trades.

Baader is the broker used to access Frankfurt, Munich, Stuttgart, Berlin, Hamburg and Dusseldorf exchanges.

Top 5 Venues: Warrants, Traded on a Trading Venue						
Class of Instrument		Securitized Derivatives: Warrants and Certificate Derivatives				
Notification if <1 average trade per business day in the previous year		No				
Top five execution venues ranked in terms of traded volumes (descending order)	MIC	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
EURONEXT - EURONEXT PARIS	XPAR	16.7%	15.7%	33%	61%	3%
SIX SWISS EXCHANGE	XSWX	8.0%	3.7%	39%	29%	79%
ELECTRONIC SHARE MARKET	MTAA	1.6%	1.2%	38%	41%	3%
EURONEXT GROWTH PARIS	ALXP	0.4%	6.0%	33%	54%	56%
LONDON STOCK EXCHANGE	XLON	0.3%	0.4%	25%	75%	0%

Top 5 Brokers: Warrants, Traded on a Trading Venue						
Class of Instrument		Securitized Derivatives: Warrants and Certificate Derivatives				
Notification if <1 average trade per business day in the previous year		No				
Top five brokers ranked in terms of traded volumes (descending order)	LEI	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of directed orders	Percentage of passive orders	Percentage of aggressive orders
Instinet, LLC	549300MGMN3RKMU8FT57	69.1%	68.8%	1%	0%	0%
Instinet Canada Ltd	549300SU730FTQOKTE75	1.8%	1.2%	0%	0%	0%
Instinet Australia Pty Ltd	549300V6EFTSRJ06G76	1.7%	0.8%	0%	0%	0%
Baader Bank AG	529900JFOPPEDUR61H13	0.2%	0.1%	0%	0%	0%
Instinet Pacific Ltd	549300RI6VZUNIR81J81	0.0%	0.1%	0%	0%	0%

Many non-EEA securities are admitted to trading in the EEA and hence are classified as MiFID securities.

Where the most liquid market for a security is outside the EEA, Instinet may execute on that market, subject to the Share Trading Obligation, in order to meet Best Execution requirements.

In some cases information relating to passive and aggressive orders is missing, including for venues that do not publish Last Liquidity information.

To assist clients in understanding where their orders are routed, we have included the following additional tables and summaries, filtered on securities listed on EEA venues only.

Top 5 Venues: Warrants, EEA Venues only						
Class of Instrument		Securitized Derivatives: Warrants and Certificate Derivatives				
Notification if <1 average trade per business day in the previous year		No				
Top five execution venues ranked in terms of traded volumes (descending order)		MIC	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders
EURONEXT - EURONEXT PARIS		XPAR	88.0%	68.5%	33%	61%
ELECTRONIC SHARE MARKET		MTAA	8.6%	5.2%	38%	41%
EURONEXT GROWTH PARIS		ALXP	1.7%	21.1%	33%	52%
DEUTSCHE BOERSE AG		XFRA	0.6%	0.3%	0%	0%
FIRST NORTH SWEDEN - SME GROWTH MARKET		SSME	0.5%	2.6%	100%	0%
						100%

The majority of orders in Warrants were executed on one of the segments of Euronext Paris.

Last Liquidity information is missing for trades executed on Deutsche Boerse Frankfurt due to technical reasons.

Top 5 Brokers: Warrants, EEA Venues only				
Class of Instrument		Securitized Derivatives: Warrants and Certificate Derivatives		
Notification if <1 average trade per business day in the previous year		No		
Top five brokers ranked in terms of traded volumes (descending order)		LEI	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class
Baader Bank AG		529900JFOPPEDUR61H13	1.2%	0.5%
				0%

Instinet Europe Ltd features here as a broker when crossing client orders.

Baader is the broker used to access Frankfurt, Munich, Stuttgart, Berlin, Hamburg and Dusseldorf exchanges.

Top 5 Venues: Other Instruments, Traded on a Trading Venue						
Class of Instrument		Other Instruments				
Notification if <1 average trade per business day in the previous year		No				
Top five execution venues ranked in terms of traded volumes (descending order)	MIC	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
LONDON STOCK EXCHANGE	XLON	17.6%	12.9%	49%	39%	65%
BOLSA DE MADRID	XMAD	6.0%	7.2%	0%	0%	28%
BLOCKMATCH DARK	BLOX	4.2%	0.7%	46%	54%	66%
CBOE EUROPE - BXE ORDER BOOKS	BATE	3.4%	2.8%	57%	26%	78%
BLOCKMATCH MTF RFQ	BRFQ	3.2%	0.9%	47%	53%	57%

Top 5 Brokers: Other Instruments, Traded on a Trading Venue				
Class of Instrument		Other Instruments		
Notification if <1 average trade per business day in the previous year		No		
Top five brokers ranked in terms of traded volumes (descending order)	LEI	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of directed orders
w	5493000V6EFTSRJ06G76	23.3%	25.1%	0%
Instinet, LLC	549300MGMN3RKMU8FT57	13.3%	27.4%	13%
Instinet Pacific Ltd	549300RI6VZUNIR81J81	8.8%	4.8%	2%
Banco Santander, S.A.	5493006QMFDMDYWIAM13	6.0%	7.2%	28%
Instinet Singapore Services Pte Ltd	5493008VCV0WOYJD2016	1.2%	0.6%	0%

Many non-EEA securities are admitted to trading in the EEA and hence are classified as MiFID securities.

Where the most liquid market for a security is outside the EEA, Instinet may execute on that market, subject to the Share Trading Obligation, in order to meet Best Execution requirements.

In some cases information relating to passive and aggressive orders is missing, including for venues that do not publish Last Liquidity information.

To assist clients in understanding where their orders are routed, we have included the following additional tables and summaries, filtered on securities listed on EEA venues only.

Top 5 Venues: Other Instruments, EEA Venues only						
Class of Instrument		Other Instruments				
Notification if <1 average trade per business day in the previous year		No				
Top five execution venues ranked in terms of traded volumes (descending order)	MIC	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
LONDON STOCK EXCHANGE	XLON	33.8%	32.6%	49%	39%	65%
BOLSA DE MADRID	XMAD	10.0%	12.1%	0%	0%	42%
BLOCKMATCH DARK	BLOX	8.1%	1.8%	46%	54%	66%
CBOE EUROPE - BXE ORDER BOOKS	BATE	6.5%	7.1%	57%	26%	78%
BLOCKMATCH MTF RFQ	BRFQ	6.1%	2.3%	47%	53%	57%

The majority of securities in this category are UK unit trust shares and Spanish rights issues, and this is reflected in the distribution of venues above.

Instinet uses BlockMatch RFQ as a venue for finding bilateral matches between all types of counterparties and for concluding block trades on exchange.

Top 5 Brokers: Other Instruments, EEA Venues only				
Class of Instrument		Other Instruments		
Notification if <1 average trade per business day in the previous year		No		
Top five brokers ranked in terms of traded volumes (descending order)	LEI	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of directed orders
Banco Santander, S.A.	5493006QMFDDMYWIAM13	10.0%	12.1%	42%
Virtu ITG Europe Ltd	213800EEC95PRUCEUP63	1.9%	0.3%	0%
J & E Davy	63540061DPCBNMCGRY22	1.0%	0.0%	0%
Morgan Stanley & Co. International Plc	4PQUHN3JPFGNF3BB653	0.7%	0.6%	100%
Liquidnet Europe Ltd	213800ZIRB79BE5XQM68	0.7%	0.0%	0%

Santander is used as a DEA broker to access Bolsa de Madrid.

Virtu ITG and Liquidnet are used as DEA brokers when accessing their MTFs, ITG POSIT and Liquidnet Blocks.

J & E Davy is used as a broker for Irish small cap stocks where liquidity is supported by market makers.

Certain Instinet clients direct orders to Morgan Stanley.

©2020, Instinet Incorporated and its subsidiaries. All rights reserved. INSTINET is a registered trademark in the United States and other countries throughout the world. Approved for distribution: in Australia by Instinet Australia Pty Limited (ACN: 131 253 686 AFSL No: 327834), which is regulated by the Australian Securities & Investments Commission; in Canada by Instinet Canada Limited, members IIROC/CIPF; in Europe by Instinet Europe Limited, which is authorized and regulated by the Financial Conduct Authority; in Hong Kong by Instinet Pacific Limited, which is authorized and regulated by the Securities and Futures Commission of Hong Kong; in Singapore by Instinet Singapore Services Private Limited, which is regulated by the Monetary Authority of Singapore, a trading member of The Singapore Exchange Securities Trading Private Limited and a clearing member of The Central Depository (Pte) Limited; and in the US by Instinet, LLC, member SIPC. This material is made available for informational purposes only and does not constitute an offer, solicitation, or recommendation with respect to the purchase or sale of any security, product or service. This material does not take into account the particular investment objectives, financial situation or needs of individual clients. No representation or warranty, express or implied, is or will be made and no responsibility or liability is or will be accepted by INSTINET or by any of their respective officers, employees or agents in relation to the accuracy or completeness of this material or any other written or oral information in respect thereof made available to you or any agent and any such liability is expressly disclaimed.