

## RTS 28 Execution Summary for year 2022

### Introduction

Pareto Securities AS (“Pareto”) is the market facing entity of the Pareto Securities group<sup>1</sup> and this report pertains to the group as a whole.

When executing orders, we are required to take all sufficient measures to achieve the best possible result for our clients, assessing this effort on the fulfilment of relevant execution factors, and where the degree of these factors’ relevance may vary on the circumstances.

This report provides a summary of the analysis and conclusions drawn from our best execution monitoring in addition to a list of our top five execution venues for executed client orders in accordance with Commission Delegated Regulation 2017/576 (RTS 28).

### Equities

**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;**

We take into account the price, volume, speed of execution, likelihood of execution, execution costs, likelihood of settlement and other considerations such as need to minimise footprint or risk of signalling when executing client orders.

The degree of relevance attached to each execution factor may vary as a subjective function of one or more variables, such as the client’s instructions, the client’s preferences, the order’s characteristic, the instrument’s characteristics, the characteristics of the trading venues on which parts of the order can be filled, the prevailing market conditions and other circumstances of importance or other criteria conceivable.

The client’s specific instructions or standard preferences may point to the achieved price compared with a given post-trade benchmark as the paramount execution factor. If a different post-trade benchmark should stand out as more relevant on account of the other variables above, the client’s instruction shall nevertheless take precedence. In the absence of such instructions or preferences, Pareto’s sales traders or execution operator will make the assessment on an order-by-order basis of which execution factors to prioritise based on the remaining variables or criteria.

Note that when orders are routed through a smart order router, the priority execution factor is price. Price in this context is measured in terms of the best price available at time of execution and price reversion post-execution. Secondly, order size is considered an important factor to reduce price impact and increase spread capture. The remaining factors – speed, likelihood of execution and other considerations relevant to the efficient execution of orders – are generally given equal ranking.

Pareto uses execution brokers to access equity markets for which we do not have a direct membership.

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<sup>1</sup> Pareto Securities AS and Pareto Securities AB with all their EEA branches, Pareto Securities AG, Pareto Securities Oy, Pareto Securities Ltd., Pareto Securities Inc., Pareto Securities Pte. Ltd. and Pareto Securities Pty. Ltd.

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

Pareto has no close links with respect to any execution venues used to execute orders, neither have Pareto any common ownership with such entities. Due to Pareto providing financial services to a wide range of clients, circumstances may have occurred where there has been a conflict of interest. Any decision to route orders to a particular venue was determined by which venue was best suited to achieve our best execution obligation.

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

Various execution venues offer fee structures based on trading volume, including discounts if trading volume exceeds certain thresholds or is of a specific nature. Such fee arrangements are equal to all members of the execution venue, and is publicly available on the website of the relevant venue. Any decision to route orders to a particular venue was determined by which venue was best suited to achieve our best execution obligation, and no incentives based on discounts were taken into consideration.

**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;**

Pareto frequently assesses its execution venues in order to obtain best execution on an ongoing basis. No new execution venues were added during the reporting period.

**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;**

Pareto provides order execution for both retail and professional clients. Retail clients can always place legitimate reliance on us to protect their interests. We do not discriminate based on client classification when executing client orders.

**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;**

Pareto generally did not give other criteria precedence over immediate price and cost when executing retail client orders. However, if a client provides specific instructions as to how an order shall be executed, such order will be executed in accordance with those instructions.

**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;**

The quality of our execution is monitored by an external transaction cost analysis tool to monitor the effectiveness of our execution capabilities. Additionally, manual monitoring of achievement versus benchmarks is performed on a regular basis. Any exceptions identified are subject to follow-up action.

**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.**

Not applicable.

**Top five execution venues and executing brokers**

Separately for professional and retail client equity order flow, we list the top five execution venues and execution brokers, respectively. We do this even though we do not discriminate based on client classification when executing client orders.

We distinguish between equities by degree of liquidity and present the data grouped into equity sub-asset classes i to iii based on average daily number of trades.

#### Professional clients – equity sub-asset class iii (top 5 venues – most illiquid names)

Class of Instrument	Equity sub-asset class iii (ADT ≤ 79)				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
MERK	38 %	42 %	42 %	58 %	0 %
SSME	28 %	23 %	57 %	43 %	0 %
XOSL	17 %	13 %	48 %	52 %	0 %
XOAS	9 %	5 %	40 %	60 %	0 %
KCSE	3 %	3 %	63 %	36 %	0 %

#### Professional clients – equity sub-asset class ii (top 5 venues – illiquid names)

Class of Instrument	Equity sub-asset class ii (80 ≤ ADT ≤ 1999)				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
MERK	74 %	8 %	49 %	51 %	0 %
XOSL	16 %	52 %	61 %	39 %	0 %
SSME	4 %	6 %	60 %	40 %	0 %
XOAS	2 %	3 %	41 %	59 %	0 %
XSTO	2 %	11 %	69 %	31 %	0 %

#### Professional clients – equity sub-asset class i (top 5 venues – liquid names)

Class of Instrument	Equity sub-asset class i (2000 ≤ ADT)				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
XOSL	70 %	48 %	62 %	38 %	0 %
XSTO	13 %	14 %	64 %	36 %	0 %
CEUX	7 %	20 %	52 %	48 %	0 %
XTXE	1 %	1 %	0 %	100 %	0 %
SSME	1 %	1 %	61 %	39 %	0 %

#### Retail clients – equity sub-asset class iii (top 5 venues – most illiquid names)

Class of Instrument	Equity sub-asset class: Liquidity band iii				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
MERK	46 %	54 %	67 %	33 %	0 %
XOSL	31 %	34 %	57 %	43 %	0 %
SSME	8 %	4 %	36 %	63 %	0 %
XOAS	7 %	5 %	54 %	46 %	0 %
DSME	5 %	0 %	43 %	57 %	0 %

### Retail clients – equity sub-asset class ii (top 5 venues – illiquid names)

Class of Instrument	Equity sub-asset class: Liquidity band ii				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
MERK	65 %	11 %	56 %	44 %	0 %
XOSL	26 %	64 %	55 %	45 %	0 %
XOAS	4 %	4 %	50 %	50 %	0 %
SSME	3 %	3 %	40 %	60 %	0 %
XSTO	1 %	7 %	53 %	47 %	0 %

### Retail clients – equity sub-asset class i (top 5 venues – liquid names)

Class of Instrument	Equity sub-asset class: Liquidity band i				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
XOSL	82 %	73 %	70 %	30 %	0 %
XSTO	11 %	16 %	47 %	53 %	0 %
CEUX	5 %	9 %	20 %	80 %	0 %
XTXE	1 %	0 %	0 %	100 %	0 %
SSME	0 %	0 %	36 %	64 %	0 %

### Professional clients – equity sub-asset class iii (top 5 brokers – most illiquid names)

Class of Instrument	Equity sub-asset class iii (ADT ≤ 79)				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
GS W22LR0WP2IHZNBB6K528	14 %	5 %	65 %	35 %	0 %
INSTINET 213800A7BEQATAOUAN40	2 %	3 %	52 %	48 %	0 %
J.P. MORGAN 549300ZK53CNGEEI6A29	1 %	7 %	41 %	59 %	0 %
VIRTU 213800EEC95PRUCEUP63	1 %	6 %	45 %	55 %	0 %
LIQUIDNET 2138005N5TO2UJR67136	0 %	0 %	94 %	6 %	0 %

### Professional clients – equity sub-asset class ii (top 5 brokers – illiquid names)

Class of Instrument	Equity sub-asset class ii (80 ≤ ADT ≤ 1999)				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
INSTINET 213800A7BEQATAOUAN40	17 %	3 %	68 %	32 %	0 %
GS W22LR0WP2IHZNBB6K528	1 %	5 %	66 %	34 %	0 %
J.P. MORGAN 549300ZK53CNGEEI6A29	1 %	13 %	55 %	45 %	0 %
VIRTU 213800EEC95PRUCEUP63	1 %	6 %	64 %	36 %	0 %
LIQUIDNET 2138005N5TO2UJR67136	0 %	0 %	91 %	9 %	0 %

### Professional clients – equity sub-asset class i (top 5 brokers – liquid names)

Class of Instrument	Equity sub-asset class i (2000 ≤ ADT)				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
INSTINET					
213800A7BEQATAOUAN40	6 %	8 %	70 %	30 %	0 %
J.P. MORGAN					
549300ZK53CNGEEI6A29	5 %	13 %	51 %	49 %	0 %
VIRTU					
213800EEC95PRUCEUP63	5 %	11 %	72 %	28 %	0 %
GS					
W22LROWP2IHZNBB6K528	3 %	6 %	62 %	38 %	0 %
LIQUIDNET					
213800N5TO2UJR67136	1 %	1 %	94 %	6 %	0 %

### Retail clients – equity sub-asset class iii (top 5 brokers – most illiquid names)

Class of Instrument	Equity sub-asset class iii (ADT ≤ 79)				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
GS					
W22LROWP2IHZNBB6K528	7 %	2 %	35 %	65 %	100 %
INSTINET					
213800A7BEQATAOUAN40	2 %	1 %	47 %	53 %	
J.P. MORGAN					
549300ZK53CNGEEI6A29	1 %	0 %	37 %	63 %	
VIRTU					
213800EEC95PRUCEUP63	0 %	0 %	21 %	79 %	

### Retail clients – equity sub-asset class ii (top 5 brokers – illiquid names)

Class of Instrument	Equity sub-asset class ii (80 ≤ ADT ≤ 1999)				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
VIRTU					
213800EEC95PRUCEUP63	1 %	0 %	54 %	46 %	
INSTINET					
213800A7BEQATAOUAN40	1 %	0 %	43 %	57 %	
J.P. MORGAN					
549300ZK53CNGEEI6A29	1 %	0 %	46 %	54 %	
GS					
W22LROWP2IHZNBB6K528	0 %	2 %	25 %	75 %	100 %

### Retail clients – equity sub-asset class i (top 5 brokers – liquid names)

Class of Instrument	Equity sub-asset class i (2000 ≤ ADT)				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
GS					
W22LROWP2IHZNBB6K528	2 %	2 %	38 %	63 %	100 %
INSTINET					
213800A7BEQATAOUAN40	1 %	1 %	77 %	23 %	0 %
J.P. MORGAN					
549300ZK53CNGEEI6A29	1 %	1 %	57 %	43 %	0 %
VIRTU					
213800EEC95PRUCEUP63	0 %	0 %	72 %	28 %	0 %
LIQUIDNET					
213800N5TO2UJR67136	0 %	0 %	91 %	9 %	0 %

## Bonds

Note that bonds in general are traded in price driven, as opposed to order driven, conditions. In all but very sporadic exceptions the orders to trade bonds in fact constitute acceptances of offers, not firm working orders. Note also that the bulk of our trading flow in fixed income instruments pertains to

professional clients. Lastly, a proportion of this trading flow is executed as over the counter trades which are made public through an APA. We do not route bond orders to execution brokers.

**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;**

These instruments are in general traded on a request for quote basis, including where clients respond to our flowed prices or indications of interests through electronic systems where clients ultimately decides whether to proceed with the transaction based on the price provided by us and other liquidity providers. Given the market practice for clients to shop around for quotes, we generally do not consider clients to invoke legitimate reliance on us to provide best execution. Therefore, our best execution obligation for fixed income instruments applies in more limited circumstances than for other asset classes. However, we will through a price discovery process, in which the client is an actively instructing part, seek to achieve a price that is reasonable given the market position.

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

Not applicable.

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

Not applicable.

**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;**

There has been no change to the execution venues for the reporting period.

**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;**

Not applicable.

**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;**

Not applicable.

**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;**

Not applicable.

**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.**

Not applicable.

**Top five venues**

In order to enable the public to evaluate the quality of our bond execution we publish the following table according to Commission Delegated Regulation 2017/576 (RTS 28) in which we for the fixed income trading flow list the top five execution venues.

#### Professional clients – fixed income (top 5 venues)

Class of Instrument	Equity sub-asset class: Bonds				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
XSTO	41 %	29 %	N/A	N/A	N/A
XOSL	29 %	31 %	N/A	N/A	N/A
XOAM	23 %	21 %	N/A	N/A	N/A
BMTF	1 %	3 %	N/A	N/A	N/A
XHEL	1 %	2 %	N/A	N/A	N/A

#### Retail clients – fixed income (top 5 venues)

Class of Instrument	Equity sub-asset class: Bonds				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
XSTO	44 %	36 %	N/A	N/A	N/A
XOSL	30 %	26 %	N/A	N/A	N/A
XFRA	14 %	23 %	N/A	N/A	N/A
XOAM	7 %	11 %	N/A	N/A	N/A
XDUB	3 %	1 %	N/A	N/A	N/A

**NOTE: Regulations require the data provided in this document and appurtenant csv-files to be made available by Pareto Securities AS to the public. Pareto Securities AS does not countenance any sale or publication of this data by any third party without prior agreement.**