



# Best Execution Quality Reporting 2019

## DB UK Bank Limited

Disclosure document related to the Commission Delegated Regulation (EU) 2017/576 of 8 June 2016 supplementing Directive 2014/65/EU of the European Parliament and of the Council with regard to regulatory technical standards for the annual publication by investment firms of information on the identity of execution venues and on the quality of execution.

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## 1. Purpose of the Document

The recast of the Markets in Financial Instruments Directive (Directive 2014/65/EU), commonly referred to as MiFID II, requires the Wealth Management Division of DB UK Bank Limited (“The Bank”) to publish a report aiming at enabling the public and investors to evaluate the quality of an investment firm's execution practices and to identify the top five execution venues in terms of trading volumes where investment firms executed or transmitted client orders in the preceding year.

This document provides an assessment of quality of execution obtained on all venues and entity used by the firm. This information will provide you with a clear picture of the execution strategies and processes applied to assess the quality of execution obtained on those venues/entities. Please be informed that information are only published in relation to those asset classes executed by the Bank for their clients in 2019. Furthermore, please also be informed that this report relates to a period (calendar year 2019).

To learn more about the identity of the top five execution venues / execution entity, please consult the relevant documents provided per asset class on our website:

[https://deutschewealth.com/content/deutschewealth/en/uk/regulatory\\_information.html](https://deutschewealth.com/content/deutschewealth/en/uk/regulatory_information.html)

Your client advisor is at your disposal in case of any further questions.

## 2. Equities - Shares & Depository Receipts

### A. Best Execution Principles

When receiving, transmitting or executing client orders as well as buying or selling financial instruments within the context of discretionary portfolio management services, the Wealth Management Division of DB UK Bank Limited ("The Bank") will take all sufficient steps to determine the best possible result primarily in terms of total consideration.

The "total consideration" is composed of the following:

- The price of the relevant financial instrument;
- The costs related to the execution.

However, in certain circumstances, for some instructions, instrument types or markets, execution factors such as speed, likelihood of execution and settlement, size and nature of the order, market impact and any other implicit transaction costs will be given precedence over the immediate price and cost consideration to ensure the best possible result for the client.

The Bank has chosen to apply the same best execution principles to professional and retail clients.

### B. Execution Entity

In 2019, all Equity orders received by the Bank from retail and professional clients were transmitted to Deutsche Bank (Suisse) SA for execution. The table below applies to Retail and Professional clients.

Class of Instrument	Equities - Shares & Depository Receipts				
Notification if < 1 average trade per business day in the previous Year	Y				
Top five execution entities ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders traded as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Deutsche Bank (Suisse) SA (LEI: 529900BXKPMXQTRE1V05)	100%	100%	N/A	N/A	0%

### C. Best Execution Quality

The Bank monitors the effectiveness of its best execution arrangements in place with execution entities and venues and assesses their performance with regards to the best execution factors outlined in the Bank's Order Execution Policy on a quarterly basis at the minimum. This is performed by assessing the current execution entities and venues against other execution entities and venues offering the same financial instrument scope and level of service as the existing execution entities and venues.

Based on the monitoring activities performed, the Bank has no reason to consider the achieved execution quality as not sufficient to ensure the clients best interest on a consistent basis.

Therefore, no changes to the execution entity was made in 2019.

### D. Information on Close Links, Conflicts of Interest, and Common Ownership

DB UK Bank Limited and Deutsche Bank (Suisse) are affiliates of Deutsche Bank AG.

In order to identify and manage actual or potential conflicts of interests resulting from this close link and common ownership, the Bank has implemented appropriate mechanisms as described in the specific conflicts of interest disclosure available under [https://deutschewealth.com/content/deutschewealth/en/uk/regulatory\\_information.html](https://deutschewealth.com/content/deutschewealth/en/uk/regulatory_information.html).

No arrangements with the execution entity for Equities were in place in 2019 regarding payments made or received, discounts, rebates or non-monetary benefits received.

## 3. Debt Instruments - Bonds

### A. Best Execution Principles

When receiving, transmitting or executing client orders as well as buying or selling financial instruments within the context of discretionary portfolio management services, the Wealth Management Division of DB UK Bank Limited ("The Bank") will take all sufficient steps to determine the best possible result primarily in terms of total consideration.

The "total consideration" is composed of the following:

- The price of the relevant financial instrument;
- The costs related to the execution.

However, in certain circumstances, for some instructions, instrument types or markets, execution factors such as speed, likelihood of execution and settlement, size and nature of the order, market impact and any other implicit transaction costs will be given precedence over the immediate price and cost consideration to ensure the best possible result for the client.

The Bank has chosen to apply the same best execution principles to professional and retail clients.

### B. Execution Entity

In 2019, all Bond orders received by the Bank from retail clients were transmitted to Deutsche Bank (Suisse) SA for execution. The table below applies to Retail clients only.

Class of Instrument	Debt Instruments - Bonds				
Notification if < 1 average trade per business day in the previous year	Y				
Top five execution entities ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders traded as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Deutsche Bank (Suisse) SA (LEI: 29900BXKPMXQTRE1V05)	100%	100%	N/A	N/A	0%

### C. Best Execution Quality

The Bank monitors the effectiveness of its best execution arrangements in place with execution entities and venues and assesses their performance with regards to the best execution factors outlined in the Bank's Order Execution Policy on a quarterly basis at the minimum. This is performed by assessing the current execution entities and venues against other execution entities and venues offering the same financial instrument scope and level of service as the existing execution entities and venues.

Based on the monitoring activities performed, the Bank has no reason to consider the achieved execution quality as not sufficient to ensure the clients best interest on a consistent basis.

Therefore, no change to the execution entity was made in 2019.

### D. Information on Close Links, Conflicts of Interest, and Common Ownership

DB UK Bank Limited and Deutsche Bank (Suisse) are affiliates of Deutsche Bank AG.

In order to identify and manage actual or potential conflicts of interests resulting from this close link and common ownership, the Bank has implemented appropriate mechanisms as described in the specific conflicts of interest disclosure available under [https://deutschewealth.com/content/deutschewealth/en/uk/regulatory\\_information.html](https://deutschewealth.com/content/deutschewealth/en/uk/regulatory_information.html).

No arrangements with the execution entity for Bonds were in place in 2019 regarding payments made or received, discounts, rebates or non-monetary benefits received.

## 4. Debt Instruments - Money Markets Instruments

### A. Best Execution Principles

When receiving, transmitting or executing client orders as well as buying or selling financial instruments within the context of discretionary portfolio management services, the Wealth Management Division of DB UK Bank Limited ("The Bank") will take all sufficient steps to determine the best possible result primarily in terms of total consideration.

The "total consideration" is composed of the following:

- The price of the relevant financial instrument;
- The costs related to the execution.

However, in certain circumstances, for some instructions, instrument types or markets, execution factors such as speed, likelihood of execution and settlement, size and nature of the order, market impact and any other implicit transaction costs will be given precedence over the immediate price and cost consideration to ensure the best possible result for the client.

The Bank has chosen to apply the same best execution principles to professional and retail clients.

### E. Execution Entity

In 2019, all Money Market orders received by the Bank from retail clients were transmitted to Deutsche Bank (Suisse) SA for execution. The table below applies to Retail clients only.

Class of Instrument	Debt Instruments - Money Market Instruments				
Notification if < 1 average trade per business day in the previous year	Y				
Top five execution entities ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders traded as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Deutsche Bank (Suisse) SA (LEI: 29900BXKPMXQTRE1V05)	100%	100%	N/A	N/A	0%

### F. Best Execution Quality

The Bank monitors the effectiveness of its best execution arrangements in place with execution entities and venues and assesses their performance with regards to the best execution factors outlined in the Bank's Order Execution Policy on a quarterly basis at the minimum. This is performed by assessing the current execution entities and venues against other execution entities and venues offering the same financial instrument scope and level of service as the existing execution entities and venues.

Based on the monitoring activities performed, the Bank has no reason to consider the achieved execution quality as not sufficient to ensure the clients best interest on a consistent basis.

Therefore, no change to the execution entity was made in 2019.

### G. Information on Close Links, Conflicts of Interest, and Common Ownership

DB UK Bank Limited and Deutsche Bank (Suisse) are affiliates of Deutsche Bank AG.

In order to identify and manage actual or potential conflicts of interests resulting from this close link and common ownership, the Bank has implemented appropriate mechanisms as described in the specific conflicts of interest disclosure available under [https://deutschewealth.com/content/deutschewealth/en/uk/regulatory\\_information.html](https://deutschewealth.com/content/deutschewealth/en/uk/regulatory_information.html).

No arrangements with the execution entity for Money Markey Instruments were in place in 2019 regarding payments made or received, discounts, rebates or non-monetary benefits received.

## 5. Currency Derivatives - Swaps, forwards and other currency derivatives

### A. Best Execution Principles

When receiving, transmitting or executing client orders as well as buying or selling financial instruments within the context of discretionary portfolio management services, the Wealth Management Division of DB UK Bank Limited ("The Bank") will take all sufficient steps to determine the best possible result primarily in terms of total consideration.

The "total consideration" is composed of the following:

- The price of the relevant financial instrument;
- The costs related to the execution.

However, in certain circumstances, for some instructions, instrument types or markets, execution factors such as speed, likelihood of execution and settlement, size and nature of the order, market impact and any other implicit transaction costs will be given precedence over the immediate price and cost consideration to ensure the best possible result for the client.

The Bank has chosen to apply the same best execution principles to professional and retail clients.

### B. Execution Entity

In 2019, all Currency Derivative orders received by the Bank from professional clients involving swaps, forwards and other derivatives were transmitted to Deutsche Bank (Suisse) SA for execution. The table below applies to Professional clients only.

Class of Instrument	Currency Derivatives - Swaps, Forwards and other currency derivatives				
Notification if < 1 average trade per business day in the previous year	Y				
Top five execution entities ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders traded as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Deutsche Bank (Suisse) SA (LEI: 29900BXKPMXQTRE1V05)	100%	100%	N/A	N/A	0%

### C. Best Execution Quality

The Bank monitors the effectiveness of its best execution arrangements in place with execution entities and venues and assesses their performance with regards to the best execution factors outlined in the Bank's Order Execution Policy on a quarterly basis at the minimum. This is performed by assessing the current execution entities and venues against other execution entities and venues offering the same financial instrument scope and level of service as the existing execution entities and venues.

Based on the monitoring activities performed, the Bank has no reason to consider the achieved execution quality as not sufficient to ensure the clients best interest on a consistent basis.

Therefore, no change to the execution entity was made in 2019.

### D. Information on Close Links, Conflicts of Interest, and Common Ownership

DB UK Bank Limited and Deutsche Bank (Suisse) are affiliates of Deutsche Bank AG.

In order to identify and manage actual or potential conflicts of interests resulting from this close link and common ownership, the Bank has implemented appropriate mechanisms as described in the specific conflicts of interest disclosure available under [https://deutschewealth.com/content/deutschewealth/en/uk/regulatory\\_information.html](https://deutschewealth.com/content/deutschewealth/en/uk/regulatory_information.html).

No arrangements with the execution entity for Currency Derivatives (Swaps, Forwards and other currency derivatives) were in place in 2019 regarding payments made or received, discounts, rebates or non-monetary benefits received.

## 6. Securitized Derivatives - Warrants and Certificate Derivatives

### A. Best Execution Principles

When receiving, transmitting or executing client orders as well as buying or selling financial instruments within the context of discretionary portfolio management services, the Wealth Management Division of DB UK Bank Limited ("The Bank") will take all sufficient steps to determine the best possible result primarily in terms of total consideration.

The "total consideration" is composed of the following:

- The price of the relevant financial instrument;
- The costs related to the execution.

However, in certain circumstances, for some instructions, instrument types or markets, execution factors such as speed, likelihood of execution and settlement, size and nature of the order, market impact and any other implicit transaction costs will be given precedence over the immediate price and cost consideration to ensure the best possible result for the client.

The Bank has chosen to apply the same best execution principles to professional and retail clients.

### B. Execution Entity

In 2019, all Securitized Derivatives orders received by the Bank from retail and professional clients were transmitted to Deutsche Bank (Suisse) SA for execution. The table below applies to Retail and Professional clients.

Class of Instrument	Securitized Derivatives - Warrants and Certificate Derivatives				
Notification if < 1 average trade per business day in the previous year	Y				
Top five execution entities ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders traded as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Deutsche Bank (Suisse) SA (LEI: 529900BXKPMXQTRE1V05)	100%	100%	N/A	N/A	0%

### C. Best Execution Quality

The Bank monitors the effectiveness of its best execution arrangements in place with execution entities and venues and assesses their performance with regards to the best execution factors outlined in the Bank's Order Execution Policy on a quarterly basis at the minimum.

For the execution entity used to execute secondary securitized derivatives, this is performed by assessing the current execution entities against other execution entities offering the same financial instrument scope and level of service as the existing execution entities.

Based on this assessment, no change of the execution entity was made in 2019.

For the execution venues used to execute primary securitized derivatives, Deutsche Bank group regularly reviews the list of approved issuers based on criteria such as credit ratings of various rating agency, credit default spreads, as well as internal ratings. In case of material deterioration of these ratings, issuers may be removed from this list. On the other hand, issuers showing improved credit ratings may be added to the list. Based on this assessment, the list of approved execution venues for primary securitized derivatives was amended in 2019.

### D. Information on Close Links, Conflicts of Interest, and Common Ownership

DB UK Bank Limited and Deutsche Bank (Suisse) are affiliates of Deutsche Bank AG.

In order to identify and manage actual or potential conflicts of interests resulting from this close link and common ownership, the Bank has implemented appropriate mechanisms as described in the specific conflicts of interest disclosure available under [https://deutschewealth.com/content/deutschewealth/en/uk/regulatory\\_information.html](https://deutschewealth.com/content/deutschewealth/en/uk/regulatory_information.html).



## 7. Exchange Traded Products

### A. Best Execution Principles

When receiving, transmitting or executing client orders as well as buying or selling financial instruments within the context of discretionary portfolio management services, the Wealth Management Division of DB UK Bank Limited ("The Bank") will take all sufficient steps to determine the best possible result primarily in terms of total consideration.

The "total consideration" is composed of the following:

- The price of the relevant financial instrument;
- The costs related to the execution.

However, in certain circumstances, for some instructions, instrument types or markets, execution factors such as speed, likelihood of execution and settlement, size and nature of the order, market impact and any other implicit transaction costs will be given precedence over the immediate price and cost consideration to ensure the best possible result for the client.

The Bank has chosen to apply the same best execution principles to professional and retail clients.

### B. Execution Entity

In 2019, all ETP orders received by the Bank from retail and professional clients were transmitted to Deutsche Bank (Suisse) SA for execution. The table below applies to Retail and professional clients.

Class of Instrument	Exchange Traded Products				
Notification if < 1 average trade per business day in the previous year	N				
Top five execution entities ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders traded as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Deutsche Bank (Suisse) SA (LEI: 529900BXXKPMXQTRE1V05)	100%	100%	N/A	N/A	0%

### C. Best Execution Quality

The Bank monitors the effectiveness of its best execution arrangements in place with execution entities and venues and assesses their performance with regards to the best execution factors outlined in the Bank's Order Execution Policy on a quarterly basis at the minimum. This is performed by assessing the current execution entities and venues against other execution entities and venues offering the same financial instrument scope and level of service as the existing execution entities and venues.

Based on the monitoring activities performed, the Bank has no reason to consider the achieved execution quality as not sufficient to ensure the clients best interest on a consistent basis.

Therefore, no change to the execution entity was made in 2019.

### D. Information on Close Links, Conflicts of Interest, and Common Ownership

DB UK Bank Limited and Deutsche Bank (Suisse) are affiliates of Deutsche Bank AG.

In order to identify and manage actual or potential conflicts of interests resulting from this close link and common ownership, the Bank has implemented appropriate mechanisms as described in the specific conflicts of interest disclosure available under [https://deutschewealth.com/content/deutschewealth/en/uk/regulatory\\_information.html](https://deutschewealth.com/content/deutschewealth/en/uk/regulatory_information.html).

No arrangements with the execution entity for Exchange Traded Products were in place in 2019 regarding payments made or received, discounts, rebates or non-monetary benefits received.

## 8. Commentary to accompany the RTS 28 Top 5 Execution Venue Report for DB UK Bank Limited

In accordance with EU Commission Delegated Regulation 2017/576 of 8 June 2016 (“Regulatory Technical Standard (RTS) 28”) supplementing MiFID (Directive 2014/65/EU), this document provides information on the top 5 venues / brokers (in terms of trading volumes) used by DB UK Bank in calendar year 2019, to execute client orders. We also provide below information pertaining to the quality of execution obtained, as asked under Article 3(3) of RTS 28.

[http://ec.europa.eu/finance/securities/docs/isd/mifid/rts/160608-rts-28\\_en.pdf](http://ec.europa.eu/finance/securities/docs/isd/mifid/rts/160608-rts-28_en.pdf)

As required under Article 3(3) of MiFID RTS 28	Instrument applicability	Commentary (as applicable to DB UK Bank Limited)
<i>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 making assessments of the quality of execution;</i>	All	The execution factors and their relative importance are described in our Order Execution Policy. This can be found here: <a href="https://deutschewealth.com/content/deutschewealth/en/articles/regulatory_information.html">https://deutschewealth.com/content/deutschewealth/en/articles/regulatory_information.html</a>
<i>(b) a description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders;</i>	All	All orders are transmitted to an internal entity for execution, DB Suisse. No orders are sent to execution venues directly by DBUK Bank. Orders are transmitted to DB Suisse as an SLA is in place between DBUK Bank and DB Suisse to achieve best execution for our clients and to provide access to all required markets.
<i>(c) a description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received;</i>	All	As detailed above, all orders are transmitted to DB Suisse for execution
<i>(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;</i>	All	There has been no change in the list of execution venues. As detailed above, all orders are transmitted solely to DB Suisse for execution
<i>(e) an explanation of how order execution differs according to client categorisation, where the firm treats such category of client differently and where it may affect the order execution arrangements;</i>	All	For Best Execution principles, refer to Section 2.1.1 & 2.1.2 of the Order Execution Policy. This can be found here: <a href="https://deutschewealth.com/content/deutschewealth/en/articles/regulatory_information.html">https://deutschewealth.com/content/deutschewealth/en/articles/regulatory_information.html</a>

As required under Article 3(3) of MiFID RTS 28	Instrument applicability	Commentary (as applicable to DB UK Bank Limited)
<i>(f) an explanation of when 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;</i>	All	For Best Execution principles, refer to Section 2.1.1 & 2.1.2 of the Order Execution Policy. This can be found here: <a href="https://deutschewealth.com/content/deutschewealth/en/articles/regulatory_information.html">https://deutschewealth.com/content/deutschewealth/en/articles/regulatory_information.html</a>
<i>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 27(10)(a) of Directive 2014/65/EU.</i>	All	As detailed above, orders are transmitted to DB Suisse for execution, and as such we rely on DB Suisse to monitor the quality of execution. On a periodic basis DBUK Bank will review the quality of execution and act appropriately based on that review. As detailed above, there is an obligation on DB Suisse to provide best execution for DBUK Bank clients.
<i>h) an explanation of how the investment firm has used, if applicable, output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU which will allow for the development of enhanced measures of execution quality or any other algorithms used to optimise and assess execution performances.</i>	All	As above, all orders are transmitted to DB Suisse for execution and so this would only be applicable for DB Suisse as opposed to DBUK Bank.