

MiFID II RTS 28 Report - Execution Top 5 Venues, Retail Clients

DIF Broker - Sociedade Financeira de Corretagem, S.A. - 2018

| Class of Instrument | Debt instruments - Bonds | | | | |
|--|-----------------------------------|-----------------------------------|----------------|-------------------|-----------------|
| Notification if <1 average trade per business day in the previous year | Υ | | | | |
| Top five execution venues | Proportion of volume traded as a | Proportion of orders executed as | Percentage of | Percentage of | Percentage of |
| ranked in terms of trading | percentage of total in that class | percentage of total in that class | passive orders | aggressive orders | directed orders |
| volumes (descending order) | | | | | |
| Saxo Bank A/S - 549300TL5406IC1XKD09 | 100,0% | 100,0% | | | |

| 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 | Proportion of volume traded as a | Proportion of orders executed as | Percentage of | Percentage of | Percentage of |
| ranked in terms of trading | percentage of total in that class | percentage of total in that class | passive orders | aggressive orders | directed orders |
| volumes (descending order) | | | | | |
| Saxo Bank A/S - 549300TL5406IC1XKD09 | 100,0% | 100,0% | | | |

| Class of Instrument | Contracts for difference | | | | |
|--|-----------------------------------|-----------------------------------|----------------|-------------------|-----------------|
| Notification if <1 average trade per business day in the previous year | N | | | | |
| Top five execution venues | Proportion of volume traded as a | Proportion of orders executed as | Percentage of | Percentage of | Percentage of |
| ranked in terms of trading | percentage of total in that class | percentage of total in that class | passive orders | aggressive orders | directed orders |
| volumes (descending order) | | | | | |
| Saxo Bank A/S - 549300TL5406IC1XKD09 | 100,0% | 100,0% | | | |

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Classification of Passive / Aggressive Orders:

- Aggressive order is defined as an order that is submitted to a venue which runs an order book and took liquity on the order book
- Passive order is defined as an order that is submitted to a venue which runs an order book and provided liquity on the order book
- For orders executed via venues/liquidty providers/market makers not running an order book the passive/aggressive classification is not relevant and thus is not specified.
- No orders are directed as thus field is not specified

Categorisation of Products into Classes of Financial Instruments:

- Debt instruments Bonds
 o Bonds
- Currency derivatives Swaps, forwards, and other currency derivatives o FX Spot, FX Forwards, FX Options, FX NDFs
- Contracts for difference o CFD Index Trackers, CFD on Commodity, CFD on FX, CFD on Bond

Data:

Data:

This first set of RTS 28 report is based on data for the calendar year 2018. However it should be noted that data on passive/aggressive indicators for orders is only included for Dec 2018, as data for the full preceding year has not been available. Thus indicator is not available for brokers/venues with no executions in Dec 2018.

ESMA has recognized that for the first set of RTS 28 reports, firms may not be able to fully report on information which is not available or applicable in relation to the preceding year e.g. where it is tied to new provisions stemming from MiFID II or MiFIR. (Question/Answer 6): https://www.esma.europa.eu/system/files force/library/esma35-43-349 mifid ii qas on investor protection topics.pdf