

2019 RTS 28 Report - Summary of the analysis

[BNP PARIBAS S.A. COMMODITIES]

In accordance with the requirements of Article 27 of the European Directive 2014/65/EU on financial instruments "MiFID II" and the associated regulatory technical standards ("RTS 28"), this report has been published to provide details of the top five venues execution venues in which BNP Paribas executed client orders during 2018 for each class of instrument as defined in MiFID II. The information provided is supplemented with analysis and conclusions based on the data provided for each asset class.

This report and BNP Paribas Order Handling and Execution Policy is available via the following web address: <https://cib.bnpparibas.com/MIFID>

Table 1: MiFID II Best Execution per Venue, Retail Clients

Class of Instrument	(I) COMMODITIES DERIVATIVES AND EMISSION ALLOWANCES DERIVATIVES (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
BNP PARIBAS (BNPS)	100.00 %	100.00 %	0.00 %	100.00 %	0.00 %



Table 2: MiFID II Best Execution per Venue, Professional Clients

Class of Instrument	(I) COMMODITIES DERIVATIVES AND EMISSION ALLOWANCES DERIVATIVES (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
BNP PARIBAS (BNPS)	99.80 %	99.52 %	0.00 %	99.52 %	0.00 %
ICAP ENERGY LIMITED (213800CZM9YMSN4AL882)	0.20 %	0.48 %	0.00 %	0.48 %	0.00 %

Class of Instrument	(I) COMMODITIES DERIVATIVES AND EMISSION ALLOWANCES DERIVATIVES (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
BNP PARIBAS (BNPS)	100.00 %	100.00 %	0.00 %	100.00 %	0.00 %

Class of Instrument	(L) EMISSION ALLOWANCES				
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
BNP PARIBAS (BNPS)	100.00 %	100.00 %	0.00 %	100.00 %	0.00 %

Table 3: Brokers Reports - Professional Clients

Class of Instrument	(I) COMMODITIES DERIVATIVES AND EMISSION ALLOWANCES DERIVATIVES (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
BNP PARIBAS PRIME BROKERAGE (7VHWWWW4UJS7NUM3PT3)	93 %	83 %	82.82 %	0.00 %	82.82 %
BNP PARIBAS COMMODITY FUTURES (5493008J1H7T08EQEU09)	7 %	17 %	17.18 %	0.00 %	17.18 %

Class of Instrument	(I) COMMODITIES DERIVATIVES AND EMISSION ALLOWANCES DERIVATIVES (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
BNP PARIBAS SECS CORP (RCNB60TYUAMMP879YW96)	88 %	60 %	60.38 %	0.00 %	60.38 %
BNP PARIBAS PRIME BROKERAGE (7VHWWWW4UJS7NUM3PT3)	12 %	40 %	39.61 %	0.00 %	39.61 %
BNP PARIBAS COMMODITY FUTURES (5493008J1H7T08EQEU09)	0 %	0 %	0.02 %	0.00 %	0.02 %

A. 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;

1. Bespoke product range

BNP Paribas is able to offer liquidity on bespoke derivative contracts across a wide range of underlyings, whereas external venues offer standardised products;

2. Likelihood of execution and settlement

BNP Paribas is able to offer consistency in liquidity provision as well as the ability to hold prices firm for sufficient time to improve the likelihood of execution;

3. Price

BNP Paribas aims to provide a competitive service. When executing a previously provided quote BNP Paribas will take into account any change in market conditions during the time elapsed from when the quote was made adjusting the quote accordingly where market conditions dictate; and

**4. Market impact**

BNP Paribas maintains significant inventories to facilitate client transactions. By using these inventories and transforming liquidity in related instruments we are able to minimise the implicit cost to clients by minimising market impact.

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

n/a

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

n/a

D. 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;

BNP Paribas continues to review the execution venues that it uses but no change has been made to the execution venues used since the BNP Paribas execution policy was last amended.

E. 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;

BNP Paribas does not make a distinction in the application of its best execution arrangements based on client classification

F. 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;

BNP Paribas does not generally execute trades with retail clients. In the limited circumstance where trades are executed with retail clients, BNP Paribas considers total consideration (price and execution costs) to be the primary execution factor. If any other factors were to take precedence, this would only occur following discussion with and agreement of the retail client.

G. 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;

BNP Paribas utilises a number of processes to analyse the quality of its execution arrangements. These processes will also encompass reviewing the data issued by other execution venues under RTS 27 once such information becomes available.

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.



BNPP does not currently use any CTP for analysis of best execution, but will monitor the availability of such providers and the quality of information provided as part of on-going reviews of our best execution arrangements