



LOMBARD ODIER
INVESTMENT MANAGERS

Lombard Odier Asset Management (Europe) Limited

Top Five Execution Venues Report

Scope and Approval	Details
Reporting Period	January 1 st 2020 to December 31 st 2020
Approval authority	LOIM Best Execution Committee
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Definitions

Term	Definition
Best Execution	Duty of the Firm to take all sufficient steps to execute orders on terms most favourable to the client taking into consideration price, costs, speed, likelihood of execution and settlement, size, nature or any other relevant consideration.
Clients	Discretionary clients for which LOIM is executing orders on an agency basis with external brokers / counterparties.
Firm	Lombard Odier Asset Management (Europe) Limited
LOAME	Lombard Odier Asset Management (Europe) Limited
LOC	Bank Lombard Odier & Co Ltd , an affiliated company of the Firm
LOIM	Lombard Odier Asset Management (Europe) Limited, Lombard Odier Asset Management (Switzerland) SA Lombard Odier Funds (Europe) SA and Lombard Odier Asset Management (USA) Corp
LOIM Trading Desk	The LOIM Trading Desk consists of traders based in New York, London, Geneva and Hong Kong who shall execute orders received from Portfolio Managers
Portfolio Managers	Investment professionals in charge of the day-to-day portfolio management activities within the Firm

1. Purpose of the report

The top five execution venues of Lombard Odier Asset management (Europe) Limited are reported below as required by the Regulatory Technical Standards 28 (RTS 28) of the MiFID II Regulations and Article 65(5) of the MiFID II Delegated Regulation.

Investment firms shall publish on an annual basis the top five execution venues in terms of trading volumes for all executed client orders per class of financial instruments.

Investment firms shall also publish for each class of financial instruments, a summary of the analysis and conclusions they draw from their detailed monitoring of the quality of execution obtained on the execution venues where they executed all client orders in the previous year.

2. Top five execution venues

Class of Instrument		Equities - Shares & Depositary Receipts / Tick size liquidity band 1 and 2(from 0 to 79 trades per day)				
Notification if <1 average trade per business day in the previous year		NO				
Top 5 execution venues ranked in terms of trading volumes(descending order)		Proportion of volume traded in percentage of total in that class	Proportion of orders executed as percentage of total in that asset class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Execution Venue	Liquidnet Europe Equities - 213800ZIRB79BE5XQM68	93.04%	89.25%	N/A	N/A	
	BlockMatch - 213800MXAKR2LA1VBM44	4.79%	5.68%	N/A	N/A	
	Investment Technology Group Ltd (POSIT) - 213800EEC95PRUCEUP63	1.41%	2.15%	N/A	N/A	
	Cboe Europe Equities MTF - Cboe Large in Scale Service - 254900ERRPSKE7UZH711	0.77%	2.92%	N/A	N/A	
Entity (Broker)	GOLDMAN SACHS INTERNATIONAL - W22LROWP2IHZNBB6K528	48.69%	49.79%	N/A	N/A	
	J.P. MORGAN SECURITIES PLC - K6Q0W1PS1L1O4IQL9C32	15.58%	15.38%	N/A	N/A	
	MERRILL LYNCH INTERNATIONAL - GGDZP1UYGU9STUHRDP48	14.04%	12.56%	N/A	N/A	
	MORGAN STANLEY & CO. INTERNATIONAL PLC - 4PQUHN3JPFGFNF3BB653	11.10%	11.46%	N/A	N/A	
	UBS AG - BFM8T61CT2L1QCCEMIK50	10.60%	10.81%	N/A	N/A	

Class of Instrument		Equities - Shares & Depositary Receipts / Tick size liquidity bands 3 and 4 (from 80 to 1 999 trades per day)				
Notification if <1 average trade per business day in the previous year		NO				
Top 5 execution venues ranked in terms of trading volumes(descending order)		Proportion of volume traded in percentage of total in that class	Proportion of orders executed as percentage of total in that asset class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Execution Venue	Liquidnet Europe Equities - 213800ZIRB79BE5XQM68	60.13%	68.75%	N/A	N/A	
	Cboe Europe Equities MTF - Cboe Large in Scale Service - 254900ERRPSKE7UZH711	39.87%	31.25%	N/A	N/A	
Entity (Broker)	GOLDMAN SACHS INTERNATIONAL - W22LROWP2IHZNBB6K528	40.58%	12.24%	N/A	N/A	
	Mccall, Aitken, Mckenzie & Co Limited - 254900DMAIBPKIRH3O57	27.26%	60.14%	N/A	N/A	
	LIQUIDNET EUROPE LIMITED - 213800ZIRB79BE5XQM68	11.90%	13.56%	N/A	N/A	
	CANACCORD GENUITY LIMITED - ZBU7VVFV5NIMN4ILRFC23	11.67%	3.57%	N/A	N/A	
	PEEL HUNT LLP - 5493007DWN0R4YBM4C84	8.58%	10.49%	N/A	N/A	

Class of Instrument		Equities - Shares & Depositary Receipts / Tick size liquidity bands 5 and 6 (from 2 000 trades per day)				
Notification if <1 average trade per business day in the previous year		NO				
Top 5 execution venues ranked in terms of trading volumes(descending order)		Proportion of volume traded in percentage of total in that class	Proportion of orders executed as percentage of total in that asset class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Execution Venue	Liquidnet Europe Equities - 213800ZIRB79BE5XQM68	53.35%	58.33%	N/A	N/A	
	Cboe Europe Equities MTF - Cboe Large in Scale Service - 254900ERRPSKE7UZH711	46.65%	41.67%	N/A	N/A	
Entity (Broker)	GOLDMAN SACHS INTERNATIONAL - W22LROWP2IHZNBB6K528	75.41%	79.74%	N/A	N/A	
	UBS Europe SE - 5299007QVIQ7IO64NX37	7.08%	5.95%	N/A	N/A	
	RBC Capital Markets, LLC - 549300LCO2FLSSVFFR64	6.92%	4.13%	N/A	N/A	
	MORGAN STANLEY & CO. INTERNATIONAL PLC - 4PQUHN3JPFGFNF3BB653	5.38%	3.67%	N/A	N/A	
	Banque Lombard Odier & Cie SA - 4BY1ZWG5DYMF1HP5KL86	5.20%	6.51%	N/A	N/A	0.87%

Class of Instrument		Debt instruments / Bonds				
Notification if <1 average trade per business day in the previous year		NO				
Top 5 execution venues ranked in terms of trading volumes(descending order)		Proportion of volume traded in percentage of total in that class	Proportion of orders executed as percentage of total in that asset class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Execution Venue	MarketAxess Europe MTF - 549300TTHIODYMGND828	54.94%	65.03%	N/A	N/A	
	Bloomberg Multilateral Trading Facility - 549300ROEJDDAXM6LU05	45.02%	34.85%	N/A	N/A	
	SIX Swiss Exchange - 529900HQ12A6FGDMWA17	0.04%	0.10%	N/A	N/A	
	Tradeweb Europe Limited MTF - 2138001WXZQOPMPA3D50	0.00%	0.02%	N/A	N/A	
Entity (Broker)	J.P. MORGAN SECURITIES PLC - K6Q0W1PS1L1O4IQL9C32	26.39%	26.81%	N/A	N/A	
	JEFFERIES INTERNATIONAL LIMITED - S5THZMDUJCTQZBTRV198	24.30%	20.15%	N/A	N/A	
	MERRILL LYNCH INTERNATIONAL - GGDZP1UYGU9STUHRDP48	18.48%	18.59%	N/A	N/A	
	BNP PARIBAS - R0MUWSFPU8MPRO8K5P83	15.86%	17.79%	N/A	N/A	0.00%
	GOLDMAN SACHS INTERNATIONAL - W22LROWP2IHZNBB6K528	14.97%	16.66%	N/A	N/A	

Class of Instrument		Interest rates derivatives / Futures and options admitted to trading on a trading venue				
Notification if <1 average trade per business day in the previous year		NO				
Entity (Broker)	Top 5 execution venues ranked in terms of trading volumes(descending order)	Proportion of volume traded in percentage of total in that class	Proportion of orders executed as percentage of total in that asset class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
	CITIGROUP GLOBAL MARKETS LIMITED - XKZZ2JZF41MRHTR1V493	67.42%	68.43%	N/A	N/A	
	J.P. MORGAN SECURITIES PLC - K6Q0W1PS1L1O4IQL9C32	26.93%	24.27%	N/A	N/A	0.14%
	Credit Suisse AG - ANGGYXNX0JLX3X63JN86	5.63%	7.12%	N/A	N/A	
	Banque Lombard Odier & Cie SA - 4BY1ZWG5DYMF1HP5KL86	0.01%	0.18%	N/A	N/A	

Class of Instrument		Interest rates derivatives / Swaps, forwards, and other interest rates derivatives				
Notification if <1 average trade per business day in the previous year		YES				
Entity (Broker)	Top 5 execution venues ranked in terms of trading volumes(descending order)	Proportion of volume traded in percentage of total in that class	Proportion of orders executed as percentage of total in that asset class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
	CITIGROUP GLOBAL MARKETS LIMITED - XKZZ2JZF41MRHTR1V493	68.60%	8.70%	N/A	N/A	
	BARCLAYS BANK PLC - G5GSEF7VJP517OUK5573	17.48%	65.22%	N/A	N/A	
	BNP PARIBAS - R0MUWSFPU8MPRO8K5P83	13.92%	17.39%	N/A	N/A	
	UBS Europe SE - 5299007QVIQ7IO64NX37		8.70%	N/A	N/A	

Class of Instrument		Credit derivatives / Futures and options admitted to trading on a trading venue				
Notification if <1 average trade per business day in the previous year		NO				
Entity (Broker)	Top 5 execution venues ranked in terms of trading volumes(descending order)	Proportion of volume traded in percentage of total in that class	Proportion of orders executed as percentage of total in that asset class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
	BARCLAYS BANK PLC - G5GSEF7VJP517OUK5573	53.25%	32.54%	N/A	N/A	
	CREDIT SUISSE SECURITIES SOCIEDAD DE VALORES SOCIE - 959800TMGPWX7NYM4R72	17.16%	20.48%	N/A	N/A	
	GOLDMAN SACHS INTERNATIONAL - W22LROWP2IHZNBB6K528	12.58%	17.37%	N/A	N/A	
	J.P. MORGAN SECURITIES PLC - K6Q0W1PS1L1O4IQL9C32	10.87%	10.60%	N/A	N/A	
	CITIGROUP GLOBAL MARKETS LIMITED - XKZZ2JZF41MRHTR1V493	6.14%	19.01%	N/A	N/A	

Class of Instrument		Credit derivatives / Other credit derivatives				
Notification if <1 average trade per business day in the previous year		NO				
Top 5 execution venues ranked in terms of trading volumes(descending order)		Proportion of volume traded in percentage of total in that class	Proportion of orders executed as percentage of total in that asset class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Execution Venue	Bloomberg Multilateral Trading Facility - 549300ROEJDDAXM6LU05	100.00%	100.00%	N/A	N/A	
Entity (Broker)	CITIGROUP GLOBAL MARKETS LIMITED - XKZZ2JZF41MRHTR1V493	41.44%	42.18%	N/A	N/A	
	GOLDMAN SACHS INTERNATIONAL - W22LROWP2IHZNB6K528	31.02%	33.81%	N/A	N/A	
	J.P. MORGAN SECURITIES PLC - K6Q0W1PS1L1O4IQL9C32	16.64%	17.72%	N/A	N/A	
	BARCLAYS BANK PLC - G5GSEF7VJP5I7OUK5573	7.46%	3.42%	N/A	N/A	
	BNP PARIBAS - R0MUWSFPU8MPRO8K5P83	3.43%	2.88%	N/A	N/A	

Class of Instrument		Currency derivatives / Futures and options admitted to trading on a trading venue				
Notification if <1 average trade per business day in the previous year		NO				
Top 5 execution venues ranked in terms of trading volumes(descending order)		Proportion of volume traded in percentage of total in that class	Proportion of orders executed as percentage of total in that asset class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Entity (Broker)	CITIGROUP GLOBAL MARKETS LIMITED - XKZZ2JZF41MRHTR1V493	81.79%	65.38%	N/A	N/A	
	J.P. MORGAN SECURITIES PLC - K6Q0W1PS1L1O4IQL9C32	10.95%	22.71%	N/A	N/A	
	Credit Suisse AG - ANGGYXNX0JLX3X63JN86	7.26%	11.92%	N/A	N/A	

Class of Instrument		Currency derivatives / Swaps, forwards, and other currency derivatives				
Notification if <1 average trade per business day in the previous year		NO				
Top 5 execution venues ranked in terms of trading volumes(descending order)		Proportion of volume traded in percentage of total in that class	Proportion of orders executed as percentage of total in that asset class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Execution Venue	Reuters Transaction Services Limited - FXall RFQ - 549300SDDJE84DDJNB30	99.97%	98.85%	N/A	N/A	
	EBS MTF - EBS Institutional - 2138002GI1GKI3V4UG48	0.03%	1.15%	N/A	N/A	
Entity (Broker)	UBS Europe SE - 5299007QVIQ7IO64NX37	42.14%	34.56%	N/A	N/A	0.00%
	THE TORONTO-DOMINION BANK - PT3QB789TSUIDF371261	17.60%	1.41%	N/A	N/A	
	MORGAN STANLEY & CO. INTERNATIONAL PLC - 4PQUHN3JPFQFNF3BB653	14.26%	12.92%	N/A	N/A	
	Banque Lombard Odier & Cie SA - 4BY1ZWG5DYMF1HP5KL86	13.60%	21.66%	N/A	N/A	0.68%
	CITIGROUP GLOBAL MARKETS LIMITED - XKZZ2JZF41MRHTR1V493	12.41%	29.45%	N/A	N/A	

Class of Instrument		Structured finance instruments				
Notification if <1 average trade per business day in the previous year		YES				
Entity (Broker)	Top 5 execution venues ranked in terms of trading volumes(descending order)	Proportion of volume traded in percentage of total in that class	Proportion of orders executed as percentage of total in that asset class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
	JEFFERIES INTERNATIONAL LIMITED - S5THZMDUJCTQZBTRVI98	68.63%	57.14%	N/A	N/A	
	DEUTSCHE BANK AKTIENGESELLSCHAFT - 7LTWFZYICNSX8D621K86	13.03%	14.29%	N/A	N/A	
	CITIGROUP GLOBAL MARKETS LIMITED - XKZZ2JZF41MRHTR1V493	10.98%	14.29%	N/A	N/A	
	WELLS FARGO SECURITIES INTERNATIONAL LIMITED - BWS7DNS2Z4NPKPNYKL75	7.36%	14.29%	N/A	N/A	

Class of Instrument		Equity Derivatives / Options and Futures admitted to trading on a trading venue				
Notification if <1 average trade per business day in the previous year		NO				
Entity (Broker)	Top 5 execution venues ranked in terms of trading volumes(descending order)	Proportion of volume traded in percentage of total in that class	Proportion of orders executed as percentage of total in that asset class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
	CITIGROUP GLOBAL MARKETS LIMITED - XKZZ2JZF41MRHTR1V493	65.32%	63.69%	N/A	N/A	
	J.P. MORGAN SECURITIES PLC - K6Q0W1PS1L1O4IQL9C32	31.34%	25.25%	N/A	N/A	0.34%
	MERRILL LYNCH INTERNATIONAL - GGDZP1UYGU9STUHRDP48	1.54%	4.39%	N/A	N/A	
	Credit Suisse AG - ANGGYXNX0JLX3X63JN86	0.93%	4.10%	N/A	N/A	
	UBS AG - BFM8T61CT2L1QCEMIK50	0.86%	2.56%	N/A	N/A	

Class of Instrument		Equity Derivatives / Swaps and other equity derivatives				
Notification if <1 average trade per business day in the previous year		NO				
Entity (Broker)	Top 5 execution venues ranked in terms of trading volumes(descending order)	Proportion of volume traded in percentage of total in that class	Proportion of orders executed as percentage of total in that asset class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
	GOLDMAN SACHS INTERNATIONAL - W22LROWP2IHZNBB6K528	68.52%	49.23%	N/A	N/A	
	BNP PARIBAS - ROMUWSFPU8MPRO8K5P83	16.52%	17.57%	N/A	N/A	
	SOCIETE GENERALE - O2RNE8IBXP4R0TD8PU41	12.76%	24.97%	N/A	N/A	
	MORGAN STANLEY & CO. INTERNATIONAL PLC - 4PQUHN3JPFQFNF3BB653	1.90%	2.65%	N/A	N/A	
	UBS Europe SE - 5299007QVIQ7IO64NX37	0.31%	5.58%	N/A	N/A	

Class of Instrument		Contracts for difference				
Notification if <1 average trade per business day in the previous year		NO				
	Top 5 execution venues ranked in terms of trading volumes(descending order)	Proportion of volume traded in percentage of total in that class	Proportion of orders executed as percentage of total in that asset class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Execution Venue	Cboe Europe Equities MTF - Cboe Large in Scale Service - 254900ERRPSKE7UZH711	44.95%	50.00%	N/A	N/A	
	Liquidnet Europe Equities - 213800ZIRB79BE5XQM68	30.42%	31.82%	N/A	N/A	
	BlockMatch - 213800MXAKR2LA1VBM44	24.63%	18.18%	N/A	N/A	
Entity (Broker)	Mccall, Aitken, Mckenzie & Co Limited - 254900DMAIBPKIRH3O57	38.20%	69.79%	N/A	N/A	
	BARCLAYS CAPITAL SECURITIES LIMITED - K9WDOH4D2PYBSLSOB484	29.84%	4.01%	N/A	N/A	
	LIQUIDNET EUROPE LIMITED - 213800ZIRB79BE5XQM68	12.30%	11.56%	N/A	N/A	
	NUMIS SECURITIES LIMITED - 213800P3F4RT97WDSX47	9.98%	3.25%	N/A	N/A	
	VIRTU ITG EUROPE LIMITED - 213800EEC95PRUCEUP63	9.69%	11.40%	N/A	N/A	

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 5 execution venues ranked in terms of trading volumes(descending order)	Proportion of volume traded in percentage of total in that class	Proportion of orders executed as percentage of total in that asset class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Execution Venue	Investment Technology Group Ltd (POSIT) - 213800EEC95PRUCEUP63	79.56%	68.75%	N/A	N/A	
	Bloomberg Multilateral Trading Facility - 549300ROEJDDAXM6LU05	19.39%	25.00%	N/A	N/A	
	Cboe Europe Equities MTF - Cboe Large in Scale Service - 254900ERRPSKE7UZH711	1.06%	6.25%	N/A	N/A	
Entity (Broker)	VIRTU ITG EUROPE LIMITED - 213800EEC95PRUCEUP63	39.56%	11.24%	N/A	N/A	
	GOLDMAN SACHS INTERNATIONAL - W22LROWP2IHZNBB6K528	26.90%	23.37%	N/A	N/A	
	Banque Lombard Odier & Cie SA - 4BY1ZWG5DYMF1HP5KL86	17.02%	37.28%	N/A	N/A	0.49%
	CREDIT SUISSE SECURITIES (EUROPE) LIMITED - DL6FFRRLF74S01HE2M14	11.45%	16.86%	N/A	N/A	
	LIQUIDNET EUROPE LIMITED - 213800ZIRB79BE5XQM68	5.07%	11.24%	N/A	N/A	

Class of Instrument		Securitized Derivatives / Warrants and Certificate Derivatives				
Notification if <1 average trade per business day in the previous year		YES				
Entity (Broker)	Top 5 execution venues ranked in terms of trading volumes(descending order)	Proportion of volume traded in percentage of total in that class	Proportion of orders executed as percentage of total in that asset class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
	Banque Lombard Odier & Cie SA - 4BY1ZWG5DYMF1HP5KL86	68.28%	16.67%	N/A	N/A	1.00%
	GOLDMAN SACHS INTERNATIONAL - W22LROWP2IHZNBB6K528	31.72%	50.00%	N/A	N/A	
	SOCIETE GENERALE - O2RNE8IBXP4R0TD8PU41		33.33%	N/A	N/A	

The data above is based on execution data in the period from 1st January 2020 to 31st December 2020 inclusive.

3. Analysis & Conclusions

3.1. Relative importance of execution factors

In selecting its execution venues for the reporting period, the Firm considered price, cost of executing, liquidity available for the instruments being traded, the speed of execution, reliability, likelihood of execution and settlement, continuity of trading, creditworthiness of the venue and quality of any related clearing and settlement facilities.

For the year ending 2019, Lombard Odier Asset Management (Europe) Limited can confirm it considers it has met its obligation to achieve the best possible result for its clients on a consistent basis.

3.1.1. Equity

While price was generally the most important factor, for larger orders for example, other factors such as execution certainty, market impact reduction and execution speed may have had greater importance. When LOIM Trading Desk transmitted the order to brokers for execution, it selected brokers which had a track record of achieving the best result for orders of a similar nature.

Asset Class	Liquid Market	Less Liquid Market	Other
Equities and equity-like listed derivatives	<p>1&2. Price & Cost Due to the high availability of liquidity across a number of different venues, the firm generally placed the highest importance on price.</p> <p>3. Speed Relevance of speed as an execution factor depended on the investment strategy. It was generally of second importance.</p> <p>4. Size</p> <p>5. Likelihood of execution</p> <p>6. Other considerations Other factors were less relevant when trading very liquid, listed instruments</p>	<p>1&2. Size & Likelihood of execution In illiquid markets, size was a key consideration. Capacity to execute large orders was generally prioritised over price.</p> <p>3. Price</p> <p>4. Speed</p> <p>5. Cost</p> <p>6. Other consideration Other factors were less relevant in illiquid markets</p>	Portfolio's strategy and Portfolio Managers' instructions (e.g. price limit orders, end of day order or FX fixing series orders) also had a significant influence on order handling and execution.

3.1.2. Fixed Income (including Convertible Bonds)

Consistent liquidity and price were normally the most important factors in deciding where and how to execute. Next in order of preference were: competitiveness of spreads, promptness of execution, and past history in executing orders.

When trading listed derivatives, particular consideration was given to: costs, speed and likelihood of execution. Where relevant, brokers were selected on their pricing, liquidity capability, clearance and settlement capabilities, quality of service, access to markets, credit worthiness and financial stability.

Asset Class	Liquid Market	Less Liquid Market
Fixed income including convertible bonds	<p>1&2. Price & Cost Price was the key consideration. Cost was important and varied depending on trades.</p> <p>3. Likelihood of execution</p> <p>4. Speed Importance of speed varied according to the instrument (e.g. for volatile products speed was more important)</p> <p>5. Size</p> <p>6. Other considerations Other factors were less relevant when trading very liquid instruments</p>	<p>1. Price In less liquid markets, price remained the main factor taken into consideration</p> <p>2. Size & Likelihood of execution In illiquid markets, the capacity to execute large orders was a key consideration which came second in line after the price.</p> <p>4. Speed</p> <p>5. Cost</p> <p>6. Other considerations Other factors were less relevant when trading less liquid instruments</p>

3.1.3. Money Market Instruments

Due to the specific nature of settlement in money markets instruments, particular importance was placed on the effectiveness of settlement and clearing when selecting a venue. However, as with the other assets; price, costs, speed of execution, likelihood of execution, speed of settlement, likelihood of settlement, size of order and nature of order were also factors when considering how and where to execute.

Asset Class	Liquid Market	Less Liquid Market
Money market instruments	<p>1&2. Price & Cost Price was the key consideration. Cost was important and varied depending on trades.</p> <p>3. Likelihood of execution</p> <p>4. Speed Importance of speed varied according to the instrument (e.g. for volatile products speed was more important)</p> <p>5. Size</p> <p>6. Other considerations Other factors were less relevant when trading very liquid instruments</p>	<p>1. Price In less liquid markets, price remained the main factor taken into consideration</p> <p>2. Size & Likelihood of execution In illiquid markets, the capacity to execute large orders was a key consideration which came second in line after the price.</p> <p>4. Speed</p> <p>5. Cost</p> <p>6. Other considerations Other factors were less relevant when trading less liquid instruments</p>

3.1.4. Foreign Exchange

Depending on the size of an order, LOIM Trading Desk generally obtained several simultaneous quotations from multiple counterparties, with the predominant factor being best price at the time of execution. For very large orders, a single counterparty may have been approached dependent on the execution strategy at the time of the order. In such a case, venue selection took into consideration factors such as previous execution performance, clearance and settlement capability, credit worthiness and financial stability, timely trading and ability to trade in large volumes. For both spot and forward FX transactions, the predominant factor was best price at the time of execution.

Asset Class	Liquid Market	Less Liquid Market
FX	<p>1&2. Price & Cost Price was the key consideration. Cost was important and varied depending on trades.</p> <p>3. Speed Importance of speed varied according to the instrument (e.g. for volatile products speed was important)</p> <p>4. Size</p> <p>5. Likelihood of execution</p> <p>6. Other considerations Other factors were less relevant when trading very liquid instruments</p>	<p>1. Price In less liquid markets, price remained the main factor taken into consideration</p> <p>2. Likelihood of execution In illiquid markets, the capacity to execute an order was a key consideration which came second after the price</p> <p>3. Cost</p> <p>4. Size</p> <p>5. Speed</p> <p>6. Other considerations</p>

3.1.5. OTC Derivatives

Dealing in OTC derivatives was limited to pre-authorised counterparties with whom ISDA agreements are in place and in such cases the perceived operational efficiency of such counterparties was relevant. The selection of execution venues depended on, amongst others, the size of transaction, liquidity, counterparty risk, credit risk and perceived settlement capabilities.

Asset Class	Liquid Market	Less Liquid Market
OTC derivatives	<p>1. Price Price was the key consideration.</p> <p>2. Likelihood of execution For equivalent price, the capacity to execute an order was a key consideration.</p> <p>3. Cost</p> <p>4. Size</p> <p>5. Likelihood of settlement</p> <p>6. Other considerations</p>	<p>1. Likelihood of execution In illiquid markets the capacity to execute the order was generally prioritised over price</p> <p>2. Price In less liquid markets price remained a key consideration</p> <p>3. Cost</p> <p>4. Size</p> <p>5. Likelihood of settlement</p> <p>6. Other considerations</p>

3.2. Close links, conflicts of interests, and common ownerships with respect to execution venues used

Bank Lombard Odier & Co Ltd, wholly owned by Compagnie Lombard Odier SCmA ("LOC"), is an affiliate of Lombard Odier Asset Management (Europe) Limited ("LOAME"). As an authorised broker, LOC can execute orders on behalf of their clients, including funds and mandates managed by LOAME.

LOAME also utilizes the Direct Market Access provided by LOC in order to access the SIX exchange directly.

For information, in 2020 trading with LOC represented:

- Equity (Including ETFs): 3.6% of the total volume traded (largely as a result of directed orders, 99% of those transactions come from mandates where LOC is the only counterparty available)
- Fixed Income: <0.25% of the total volume traded
- Foreign Exchange: 12.76% of the total volume traded (All as a result of directed orders)

LOAME regularly monitors the arrangements described above to ensure potential conflicts of interest are appropriately managed and mitigated. When executing orders on behalf of LOAME, Bank Lombard Odier & Co Ltd must do so under the same principles of best execution applied to other external brokers.

3.3. Specific arrangements with any execution venues

There are no specific arrangements concerning rebates or non-monetary benefits with any current execution venues.

3.4. Factors that led to a change in the list of execution venues listed in the firm's execution policy

LOIM continuously assesses and manages its very close relationships with brokers and platforms alike. LOIM is regularly consulted on future developments of multi-asset trading technology and direction of service from brokers, keeping the firm at the forefront of disruptive technology in this space.

Over the past couple of years, several changes primarily driven by the MiFID II regulations have influenced the firm's best execution capabilities.

In January 2018, MiFID II formalized the end of Broker Crossing Network activity and put constraints on dark pool trading with double volume caps. As a result, the number of liquidity pools has increased across European markets in 2018 continuing into 2019 & 2020, as new venue types and market mechanisms emerged. The firm, for example, observed the increase of periodic auction in the new liquidity landscape, which have served as a good liquidity source for stocks that have otherwise been suspended from sub-LIS dark activity under the double volume cap mechanism.

Also noticeable has been the proliferation of the Systematic Internaliser (SI) regime since MiFID II, which was otherwise negligible prior to the regulatory change. Systematic Internalisers allow investors to interact with principal liquidity providers that provide price improvement and reduced market impact.

Finally, following the UK's withdrawal from the European Union and the Brexit transition period coming to an end on December 31st 2020 without equivalence from the EU under the Share Trade Obligation, the firm observed a shift in liquidity taking place with trading volume in EU stocks moving to EU based MTFs. The firm expects to see this shift amplified in 2021.

The full list of execution venues and approved counterparty is published on the firm's website:

<https://www.lombardodier.com/home/asset-management-regulatory-disc.html>

3.5. *Order execution according to client categorisation*

Our execution policy does not treat different categories of clients differently. All execution decisions are made by our trading desk according to a single Best Execution policy.

3.6. *Executing retail client orders*

Lombard Odier Asset Management (Europe) Limited does not have any Retail Clients.

3.7. *Data or tools relating to the quality of execution used by the investment firm*

Multiple parties including Traders, Portfolio Managers, Risk Managers and Compliance all participate in a process designed to monitor execution quality. A range of data is used to monitor execution quality on an ongoing basis and regular reporting is provided to competent committees including the Trading Oversight Committee and the Best Execution Committee that meet on a quarterly basis.

To measure and analyze its quality of execution, the firm primarily utilizes Bloomberg Transaction Cost Analysis (TCA) to monitor trade execution versus a number of different benchmarks allowing it to monitor both performance and best execution outliers. Additionally, the firm leverages the tool to help identify execution and timing trends in order to help with both benchmark and timing optimization in an effort to reduce costs.

MiFID II requires trading venues to provide reports on execution quality, as defined in RTS 27. Reports must be published on a quarterly basis and include data for each trading day. The publication must take place no later than three months after the end of each quarter. The firm observed that the data published to date has not proven useful for the purpose of its own best execution analysis but it will continue to monitor and review reports published in the coming quarters.

For additional details on the firm's execution arrangements and policy, please refer to the Best Execution Policy on the firm's website at <https://www.lombardodier.com/home/asset-management-regulatory-disc.html>

Important Information

For professional investor use only.

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Lombard Odier Investment Managers ("LOIM") is a trade name.

The information set out in this report covers LOAME's past trading activities and is not necessarily reflective of LOAME's current or future trading activities and should not be relied on as such.

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This document does not contain personalized recommendations or advice and is not intended to substitute any professional advice on investment in financial products. Before entering into any transaction, an investor should consider carefully the suitability of a transaction to his/her particular circumstances and, where necessary, obtain independent professional advice in respect of risks, as well as any legal, regulatory, credit, tax, and accounting consequences.

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