

## 2022 RTS 28 Report

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"), Capitalatwork S.A. (hereinafter "CAW SA") is required to publish information on how they executed client orders.

CAW SA carry out reception and transmission of clients' orders to execution firm CapitalatWork Foyer Group SA. This report is published to provide details of the top five execution venues in which CapitalatWork Foyer Group executed CAW SA client order during 2022 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 has been prepared by CapitalatWork Foyer Group sa, 12 Rue Léon Laval – 3372 Leudelange – Luxembourg, a FPS under the supervision of CSSF (Commission de Surveillance du Secteur Financier) reviewed and validated by CAW SA, regulated firm.

## Part 1: Information on the top five execution venue

In accordance with article 3(1) of Commission Delegated Regulation (EU) 2017/576 of 8 June 2016 with regard to regulatory technical standards for the annual publication of information on the identity of execution venues and on the quality of execution, CAW SA publishes hereinafter the top five execution venues in terms of trading volumes for all executed client orders per class of financial instruments. Information regarding retail clients are published in Table 1 of this report and information regarding professional clients are published in Table 2 of this report. The report contains the following information: (a) class of financial instruments; (b) venue name and identifier; (c) volume of client orders executed on that execution venue expressed as a percentage of total executed volume; (d) number of client orders executed on that execution venue expressed as a percentage of total executed orders; (e) percentage of the executed orders referred to in point that were passive and aggressive orders; (f) percentage of orders referred to in point that were directed orders; (g) confirmation of whether it has executed an average of less than one trade per business day in the previous year in that class of financial instruments.

In accordance with article 3(2) of Commission Delegated Regulation (EU) 2017/576, CAW SA publishes hereinafter the top five execution venues in terms of trading volumes for all executed client orders in Securities Financing Transactions (SFTs) for class of financial instruments referred to in Table 3 of this report. The publication contains the following information: (a) volume of client orders executed on that execution venue expressed as a percentage of total executed volume; (b) number of client orders executed on that execution venue expressed as a percentage of total executed orders; (c) confirmation of whether the investment firm has executed an average of less than one trade per business day in the previous year in that class of financial instruments.

**Table 1: MiFID II Best Execution per venue – CapitalatWork Foyer Group as executor – Retail Clients**

TOP 5 COUNTERPARTIES					
Class of Instrument	EQUITIES – Shares & Depository Receipts – Tick size liquidity bands 5 and 6 (from 2000 trades per day)				
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
KBC SECURITIES 2138005SP78ELT822P61	43,15%	52,92%	N/C	N/C	N/C
Insinger Gilissen KHCL65TP05J1HUW2 D560	28,76%	13,30%	N/C	N/C	N/C
Caceis France 96950023SCR9X9F3L6 62	18,49%	20,49%	N/C	N/C	N/C
Caceis Netherlands A7746KUYPUHT22ST MI41	3,76%	8,68%	N/C	N/C	N/C
ABN Amro Belgium 549300D2ZDDLNMDE Q727	2,39%	3,30%	N/C	N/C	N/C

TOP 5 COUNTERPARTIES					
Class of Instrument	EQUITIES – Shares & Depository Receipts – Tick size liquidity bands 3 and 4 (from 80 to 1999 trades per day)				
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
KBC SECURITIES 2138005SP78ELT822P61	42,82%	39,33%	N/C	N/C	N/C
Insinger Gilissen 7245006T4L0305PC0 Q20	25,96%	9,31%	N/C	N/C	N/C
Caceis France 96950023SCR9X9F3L 662	18,22%	28,49%	N/C	N/C	N/C
Caceis Netherlands 969500OLD4M3NDW VC189	8,65%	21,30%	N/C	N/C	N/C
ABN Amro Belgium 549300D2ZDDLNMDE Q727	2,05%	0,23%	N/C	N/C	N/C

TOP 5 COUNTERPARTIES					
Class of Instrument	EQUITIES – Shares & Depositary Receipts – Tick size liquidity bands 1 and 2 (from 0 to 79 trades per day)				
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
KBC Securities 2138005SP78ELT822P61	45,43%	40,80%	N/C	N/C	N/C
Insiger Gilissen KHCL65TP05J1HUW2D560	23,02%	8,63%	N/C	N/C	N/C
Caceis France 1VUV7VQFKUOQJSJ21A208	20,33%	35,00%	N/C	N/C	N/C
Caceis Netherlands A7746KUYPUHT22STMI41	6,43%	14,39%	N/C	N/C	N/C
ABN Amro Belgium 549300D2ZDDLNMDEQ727	3,52%	0.38%	N/C	N/C	N/C

TOP 5 EXECUTION VENUES					
Class of Instrument	DEBT INSTRUMENTS - 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
Caceis France 96950023SCR9X9F3L662	28.57%	36,72%	N/C	N/C	N/C
Citigroup Global Market Ltd XKZZ2JZF41MRHTR1V493	14,28%	4,42%	N/C	N/C	N/C
Nomura Intl DGQCSV2PHVF7I2743539	14,28%	53,77%	N/C	N/C	N/C
Goldman Sachs Limited W22LROWP2IHZNBB6K528	7,14%	0,10%	N/C	N/C	N/C
Clearstream 549300OL514RA0SXJJ44	7,14%	0,08%	N/C	N/C	N/C

TOP 5 COUNTERPARTIES					
Class of Instrument	EQUITY DERIVATIVES - Swaps and other equity derivatives				
Notification if <1 average trade per business day in the previous year	Y				
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
Caceis Netherlands 969500OLD4M3NDW VC189	100%	100%	N/C	N/C	N/C

TOP 5 COUNTERPARTIES					
Class of Instrument	Exchange-traded funds				
Notification if <1 average trade per business day in the previous year	Y				
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
KBC SECURITIES 2138005SP78ELT822P61	50,54%	34,48%	N/C	N/C	N/C
Caceis France 96950023SCR9X9F3L 662	31,95%	55,17%	N/C	N/C	N/C
Caceis Netherlands 969500OLD4M3NDW VC189	16,75%	6,89%	N/C	N/C	N/C
ING Belgium JLS56RAMYQZECFUF2 G44	0,74%	3,44%	N/C	N/C	N/C

TOP 5 COUNTERPARTIES					
Class of Instrument	Other Instruments				
Notification if <1 average trade per business day in the previous year	Y				
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
RBC Frankfurt 549300LCO2FLSSVFFR 64	95,94%	94,31%	N/C	N/C	N/C
RBC Belgium 549300NAT3NY2W89 BM89	3,75%	5,31%	N/C	N/C	N/C
Clearstream 549300OL514RA0SXJJ 44	0,19%	0,31%	N/C	N/C	N/C
KBC SECURITIES 2138005SP78ELT822P 61	0,10%	0,06%	N/C	N/C	N/C
Banque International de Luxembourg 9CZ7TVMR36CYD5TZ BS50	0,02%	0,02%	N/C	N/C	N/C

**Table 2: MiFID II Best Execution per venue - Professional Clients**

TOP 5 COUNTERPARTIES					
Class of Instrument	EQUITIES – Shares & Depositary Receipts – Tick size liquidity bands 5 and 6 (from 2000 trades per day)				
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
RBC Frankfurt 549300LCO2FLSSVFFR 64	75,17%	51,11%	N/C	N/C	N/C
Raymond James Bruxelles U4ONQX15J3RO8XCK E979	12,76%	29,68%	N/C	N/C	N/C
Instinet Germany GmbH 213800A7BEQATAOU AN40	6,38%	7,27%	N/C	N/C	N/C
SF Avenir Actions EDR 5493000LL3I7QO4V5 348	4,25%	0,66%	N/C	N/C	N/C
JP Morgan London 549300SOGM3USX5D OD03	0,70%	11,16%	N/C	N/C	N/C

TOP 5 COUNTERPARTIES					
Class of Instrument	EQUITIES – Shares & Depositary Receipts – Tick size liquidity bands 3 and 4 (from 80 to 1999 trades per day)				
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
RBC Frankfurt 549300LCO2FLSSVFFR 64	66,24%	59,62%	N/C	N/C	N/C
Raymond James Bruxelles U4ONQX15J3RO8XCK E979	16,87%	25,80%	N/C	N/C	N/C
Instinet Germany GmbH 213800A7BEQATAOU AN40	5,90%	7,42%	N/C	N/C	N/C
SF Avenir Actions EDR 5493000LL3I7QO4V5 348	5,90%	0,93%	N/C	N/C	N/C
JP Morgan London 549300SOGM3USX5D OD03	3,37%	5,34%	N/C	N/C	N/C

TOP 5 COUNTERPARTIES					
Class of Instrument	EQUITIES – Shares & Depositary Receipts – Tick size liquidity bands 1 and 2 (from 0 to 79 trades per day)				
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
RBC Frankfurt 549300LCO2FLSSVFFR64	31,20%	23,35%	N/C	N/C	N/C
Kepler 254900VCHS9DMDUVZN16	30,45%	32,34%	N/C	N/C	N/C
Exane 969500UP76J52A9OXU27	29,69%	30,57%	N/C	N/C	N/C
SF Avenir Actions EDR 5493000LL3I7QO4V5348	4,88%	0,88%	N/C	N/C	N/C
Raymond James Bruxelles U4ONQX15J3RO8XCKE979	2,25%	9,94%	N/C	N/C	N/C



TOP 5 EXECUTION VENUES					
Class of Instrument	DEBT INSTRUMENTS - 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
Goldman Sachs Limited W22LROWP2IHZNBB6K528	13,90%	11,45%	N/C	N/C	N/C
JP Morgan London 549300SOGM3USX5DOD03	9,27%	9,26%	N/C	N/C	N/C
Deutsche Bank AG 7LTFWZYICNSX8D621K86	8,94%	6,81%	N/C	N/C	N/C
RBC Frankfurt 549300LCO2FLSSVFFR64	8,94%	5,24%	N/C	N/C	N/C
Morgan Stanley & co Limited 4PQUHN3JPFGFNF3BB653	8,60%	5,58%	N/C	N/C	N/C

TOP 5 COUNTERPARTIES					
Class of Instrument	EQUITY DERIVATIVES - Swaps and other equity derivatives				
Notification if <1 average trade per business day in the previous year	Y				
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
JP Morgan London 549300SOGM3USX5D OD03	100%	100%	N/C	N/C	N/C

TOP 5 COUNTERPARTIES					
Class of Instrument	Other Instruments				
Notification if <1 average trade per business day in the previous year	Y				
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
JP Morgan London 549300SOGM3USX5D OD03	92,01%	98,58%	N/C	N/C	N/C
RBC Frankfurt 549300LCO2FLSSVFFR 64	6,80%	1,38%	N/C	N/C	N/C
RBC Belgium 549300NAT3NY2W89 BM89	1,18%	0,04%	N/C	N/C	N/C

**Table 3: MiFID II Best Execution per venue - Client orders in SFTs**

Not applicable.

## Part 2: Quality of execution

In accordance with article 3(1) of Commission Delegated Regulation (EU) 2017/576, CAW SA publishes hereinafter 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. The information shall include: (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 assessing the quality of execution; (b) a description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders; (c) a description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received; (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; (e) an explanation of how order execution differs according to client categorization, where the firm treats categories of clients differently and where it may affect the order execution arrangements; (f) an 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; (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 Delegated Regulation (EU) 2017/575; (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.

- (a) Explanation of the relative importance CAW SA 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

In assessing the relative importance of the execution factors, CAW SA will consider the following criteria:

- the characteristics of the client including the regulatory categorization of the client;
- the nature of the client's instructions;
- the characteristics of the transaction;
- the characteristics of the financial instrument; and
- the characteristics of the execution venues to which the transaction can be directed.

In respect of equities and ETFs, the price is determined by the market. Accordingly CAW SA will, in the absence of any specific instructions to the contrary, prioritize the execution factors in the following order:

- size of the request
- speed
- likelihood of execution
- likelihood of settlement

- ability of execution venue to manage the quotation request
- price

In respect of bonds, money market and interest rate, derivative and other instruments' transactions, CAW SA will, in the absence of any specific instructions to the contrary, prioritize the execution factors in the following order:

- size of the request
- ability of execution venue to manage the quotation request
- price
- speed
- likelihood of execution
- likelihood of settlement

Finally, the execution factors chosen may vary depending where:

- market liquidity is insufficient to fully execute the order;
- a client provides specific execution instructions;
- the client selects specific parameters of an execution algorithm; or
- market conditions indicate that in applying the execution factors in the order stated may result in a worse outcome for the client.

(b) Description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders

As regards receiving and transmitting client orders, CAW SA uses the services of CapitalatWork Foyer Group SA which is part of the same Group as being the mother company of CAW SA. As result, CAW SA has undertaken necessary measures to prevent, identify, report and manage the conflict of interests.

CapitalatWork Foyer Group ensures that all orders transmitted by CAW S.A. to CapitalatWork Foyer Group will be executed in line with its Best Execution Policy, as are other orders from other retail and professional clients of CapitalatWork Foyer Group.

CAW SA has reviewed the Best Execution Policy of CapitalatWork Foyer Group in its entirety, and agrees with the policy, the execution arrangements in place, and the execution approach, including the relative importance given to the factors of execution.

CapitalatWork Foyer Group has an established Best Execution control framework, consisting of first and second line of defence controls. In line with the guidance provided by ESMA, CAW SA monitors the quality of execution obtained from CapitalatWork Foyer Group.

Further details on the Conflicts of Interest Policy, you can find documentation on the link below:  
<https://www.capitalatwork.com/fr/informations-juridiques/>

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

CAW SA participates in standard volume rebate arrangements offered by various execution venues but such arrangements are available to all member firms of the relevant execution venue.

These are standard revenue sharing arrangements that are available to other members of the execution venue and not specific to CAW SA. Such revenue sharing arrangements are entered into at a strategic level (Treasury & Counterparty Committee) and do not influence day to day trading decisions and therefore the execution venue selection by CAW SA traders. The selection of execution venue is based solely on which execution venue enables CAW SA to satisfy its best execution obligations.

- (d) Explanation of the factors that led to a change in the list of execution venues listed in CAW SA's execution policy, if such a change occurred

CAW SA continues to review the execution venues that it uses but no change has been made to the execution venues used since the Best Execution Policy was last amended.

- (e) Explanation of how order execution differs according to client categorization, where CAW SA treats categories of clients differently and where it may affect the order execution arrangements

CAW SA does not make any difference in orders' execution from retails or professionals. However, in accordance with MiFID II regulations, CAW SA does not owe a duty of best execution for eligible counterparties and as such the CAW SA Order Handling and Execution policy does not apply to orders received from eligible counterparties.

- (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

Where trades are executed with retail clients, CAW SA 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.

The likelihood of execution and settlement is a preponderant factor for orders of significant size/less liquid. Therefore, if the execution venue/counterparty offering the best price cannot ensure full order execution, the execution factor of price becomes secondary, while the execution factor of likelihood of execution and settlement becomes dominant.

Finally, if a retail client places an order with specific instructions that cover each and every aspect of an order then the order will generally be executed in accordance with the client's instruction which may mean that factors other than total consideration may take priority. To the extent that a client places an order with specific instructions that only cover partial aspects of the order, best execution will be owed on the aspects of the order in respect of those elements not covered by the instructions.

- (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

CAW SA did not use data of tools relating to the quality of execution, including data published pursuant to RTS 27.

- (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

Not applicable.