

MiFID II RTS 28 Report (2021)

As specified by Article 3 para. 3 of the Delegated Regulation (EU) 2017/576, and Annex 7.1 number III lit. B para. 5 of the Banking Ordinance, SIGMA Bank AG prepares and publishes an annual report (MiFID II RTS 28 Report) on the five execution venues where we have executed client orders in the previous year and which are most important in terms of trading volume (top 5 execution venues) as well as a summary of the execution quality achieved.

SIGMA Bank AG does not have its own direct access to execution venues and therefore executes client orders via trading partners. A current list of the trading partners of SIGMA Bank AG can be found in Annex II of the “Best Execution Policy” on our website. Our trading partners also publish a MiFID II RTS 28 Report on their respective websites.

The MiFID II RTS 28 Report refers to the quality of execution achieved (if it can be determined by SIGMA Bank AG) and the top 5 execution venues for the following categories of financial instruments:

- Equities
- Debt instruments
- Subscription rights
- Money market instruments
- Collective investment instruments
- Options
- Futures
- FX transactions

SIGMA Bank AG did not offer the following categories of financial instruments in 2021:

- Interest rate derivatives
- Credit derivatives
- Currency derivatives
- Securitized derivatives
- Commodity derivatives and derivatives of emissions certificates
- Contracts for differences
- Emissions certificates
- Structured financial products

1. Evaluation of the quality of service achieved

1.1 Execution factors

When assessing the quality of execution, the following execution factors are considered in principle (in order of priority):

- Price of the financial instrument
- Costs associated with execution
- Speed
- Probability of execution
- Settlement of the amount
- Type of order
- Other considerations.

We accept your securities orders and pass them to our trading partners. The MiFID II RTS 28 Reports produced by our trading partners may therefore contain further information on the evaluation of the quality of execution with regard to execution factors.

1.2 Close links, conflicts of interest and joint ownerships in relation to execution venues

SIGMA Bank will take all necessary measures to recognize any conflicts of interest, which may arise when providing investment and ancillary services or from a combination thereof and be prejudicial to a client's interests and prevent them accordingly.

When providing investment services, we may, subject to certain requirements, accept inducements (such as retrocessions, acquisition commissions, fees) from third parties or grant them to third parties if this will improve the quality of the service supplied to our clients and the acceptance or granting of these donations is disclosed to the clients affected by it. In doing so, we ensure that our obligation to act in the best interests of our clients is not compromised.

More detailed information regarding this can be found in the document entitled "Information about dealing with possible conflicts of interest" on our website.

SIGMA Bank AG does not maintain any close links and has no joint ownerships with execution venues.

1.3 Particular agreements reached with trading venues on payments made and received

SIGMA Bank AG has not reached any particular agreements with trading venues on payments made and received as well as on discounts, rebates or other non-monetary benefits received.

1.4 Change of execution venues

Since SIGMA Bank AG does not have its own access to execution venues, we accept orders from our clients and pass these to other institutions (trading partners). They undertake the actual execution at an execution venue for SIGMA Bank AG.

SIGMA Bank AG carries out checks of our trading partners' compliance with the "best execution policy" on a random basis every year and also reviews their publicly available reports on the quality of their execution. A current list of the trading partners of SIGMA Bank AG can be found in Annex II of the "best execution policy" on our website. There were no changes to our trading partners in 2021.

1.5 Order execution standards for each client classification

When executing orders, SIGMA Bank AG does not distinguish between different client classifications. Orders are executed in the order in which they are received.

1.6 Value of different order execution factors for non-professional clients

It is assumed that the non-professional client primarily wishes to achieve the best possible – considering all costs directly associated with the transaction (such as execution venue charges, clearing and settlement charges, costs of switching depository) – total price (price of the financial instrument and all costs associated with execution).

Within our potential influence, we influence our trading partners in such a way that they also achieve the best possible total price.

1.7 Use of data or tools to determine the quality of execution

SIGMA Bank AG is – as described previously – unable to carry out its own evaluation of the quality of execution. SIGMA Bank AG obtains the regular MiFID II RTS 28 Reports produced by its trading partners and carries out random checks to review the quality they achieve when executing orders.

1.8 Use of the information from a consolidated data provider

SIGMA Bank AG does not use information from a consolidated data provider.

2. Report on the five most important execution venues (excluding orders as part of securities financing transactions (SFT))

2.1 Execution for non-professional clients

Equities segment (category E)

Class of Instrument	Equities				
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
Swiss Exchange (SWX)	14.39%	11.65%	44.25%	55.75%	0.77%
Xetra Exchange (ETR)	11.51%	13.21%	44.19%	55.81%	7.89%
New York Stock Exchange (NYS)	10.81%	14.97%	37.81%	62.19%	0.20%
Swiss Quotematch AG (QMH)	10.02%	2.06%	46.38%	53.62%	0.00%
Nasdaq (NMS)	9.29%	10.25%	44.77%	55.23%	1.02%

Execution by our trading partners:

- *Baader Bank, Bank J. Safra Sarasin, Bank Vontobel, UBS and Zürcher Kantonalbank*

Debt instruments (category D)

Class of Instrument	Debt instruments				
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
Over the counter abroad (XXX)	94.72%	85.01%	40.71%	59.29%	3.19%
Bloomberg TF (BMT)	1.53%	0.80%	20.00%	80.00%	0.00%
Swiss Exchange (SWX)	0.91%	4.15%	23.08%	76.92%	3.85%
Milan Stock Exchange (MIL)	0.51%	1.44%	11.11%	88.89%	0.00%
London Stock Exchange (LSS)	0.40%	0.64%	50.00%	50.00%	0.00%

Execution by our trading partners:

- *Bank J. Safra Sarasin, Bondpartners, UBS, Valcourt and Zürcher Kantonalbank*

Subscription rights segment (category R)

Class of Instrument	Subscription rights				
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
Euwax (EUW)	50.28%	63.50%	38.58%	61.42%	1.57%
Stuttgart Exchange (STR)	20.40%	14.50%	34.48%	65.52%	3.45%
Issuer abroad (EMA)	14.63%	0.50%	100.00%	0.00%	0.00%
Toronto Stock Exchange (TOR)	8.46%	10.50%	0.00%	100.00%	0.00%
Over the counter abroad (XXX)	4.31%	2.00%	50.00%	50.00%	25.00%

Execution by our trading partners:

- *Bank J. Safra Sarasin, Société Générale, UBS and Zürcher Kantonalbank*

Money market instruments segment (category DY)

Class of Instrument	Money market 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
Over the counter abroad (XXX)	67.10%	78.26%	52.78%	47.22%	0.00%
Over the counter in Liechtenstein (EMI)	21.26%	2.17%	0.00%	100.00%	0.00%
Bloomberg Trading Facility (BMT)	9.04%	4.35%	50.00%	50.00%	0.00%
Issuer abroad (EMA)	0.48%	10.87%	80.00%	20.00%	0.00%
London Stock Exchange (LSS)	1.92%	2.17%	100.00%	0.00%	0.00%

Execution by our trading partners:

- *Bondpartners, Helvetische Bank, UBS, Valcourt and Zürcher Kantonalbank*

Collective investment instruments segment (category C)

Class of Instrument	Collective investment instruments – fund units and equity securities				
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
Issuer abroad (EMA)	46.69%	74.27%	47.17%	52.83%	1.49%
Over the counter in Liechtenstein (EMI)	39.10%	20.57%	46.57%	53.43%	2.23%
Issuer SIGMA Bank AG custodian bank (EFO)	13.99%	4.85%	47.24%	52.76%	100.00%
Over the counter abroad (XXX)	0.22%	0.31%	75.00%	25.00%	12.50%

Execution by our trading partners:

- *Bank Frick, International Fund Services & Asset Management S.A., Liechtensteinische Landesbank and Neue Bank*

Options segment (category O)

Class of Instrument	Options				
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
Eurex (OEU)	100.00%	100.00%	0.00%	100.00%	100.00%

Execution by our trading partners:

- *Bank J. Safra Sarasin*

Futures segment (category F)

Class of Instrument	Futures				
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
New York Futures Exchange (FUS)	100.00%	100.00%	50.00%	50.00%	100.00%

Execution by our trading partners:

- *Bank J. Safra Sarasin*

Segment FX forwards and FX swaps segment (OTC)

Class of Instrument	FX forwards and FX swaps				
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
OTC	100.00%	100.00%	No information provided	No information provided	No information provided
<i>Trading partner</i>					
<i>UBS</i>	79.17%	70.39%	No information provided	No information provided	No information provided
<i>Zürcher Kantonalbank (ZKB)</i>	14.33%	25.75%	No information provided	No information provided	No information provided
<i>Bank J. Safra Sarasin</i>	6.50%	3.86%	No information provided	No information provided	No information provided

2.2 Execution for professional clients

Equities segment (category E)

Class of Instrument	Equities				
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
Issuer abroad (EMA)	24.38%	25.45%	100.00%	0.00%	0.00%
Xetra Exchange (ETR)	23.68%	18.18%	60.00%	40.00%	0.00%
NYSE Arca (PAC)	14.17%	5.45%	0.00%	100.00%	0.00%
Swiss Exchange (SWX)	11.81%	16.36%	22.22%	77.78%	0.00%
Over the counter abroad (XXX)	7.50%	12.73%	28.57%	71.43%	0.00%

Execution by our trading partners:

- *Bank J. Safra Sarasin, Leonteq, UBS and Zürcher Kantonalbank*

Debt instruments (category D)

Class of Instrument	Debt 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
Over the counter abroad (XXX)	65.73%	66.67%	83.33%	16.67%	0.00%
Issuer abroad (EMA)	26.94%	22.22%	50.00%	50.00%	0.00%
Xetra Exchange (ETR)	7.33%	11.11%	0.00%	100.00%	0.00%

Execution by our trading partners:

- *Bank J. Safra Sarasin, Leonteq and UBS*

Subscription rights segment (category R)

Class of Instrument	Subscription rights				
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
Issuer abroad (EMA)	76.46%	75.00%	33.33%	66.67%	0.00%
Over the counter abroad (XXX)	23.54%	25.00%	100.00%	0.00%	0.00%

Execution by our trading partners:

- *Leonteq*

Money market instruments segment (category DY)

Class of Instrument	Money market 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
Over the counter abroad (XXX)	100.00%	100.00%	66.67%	33.33%	0.00%

Execution by our trading partners:

- *UBS*

Collective investment instruments segment (category C)

Class of Instrument	Collective investment instruments – fund units and equity securities				
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
Issuer SIGMA Bank AG custodian bank (EFO)	79.83%	19.77%	64.71%	35.29%	100.00%
Issuer abroad (EMA)	17.65%	62.79%	29.63%	70.37%	22.22%
Over the counter in Liechtenstein (EMI)	2.53%	17.44%	40.00%	60.00%	0.00%

Execution by our trading partners:

- *Bank Frick, Liechtensteinische Landesbank and International Fund Services & Asset Management S.A.*

Futures segment (category F)

Class of Instrument	Futures				
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
Eurex Exchange (FEU)	100.00%	100.00%	50.00%	50.00%	100.00%

Execution by our trading partners:

- *Bank J. Safra Sarasin*