

## RTS 28 - REPORTING PER ASSET CLASS

### CONSOLIDATED TOP 5 ENTITIES & EXECUTION VENUES

Class Of Instrument	Equities - shares & Exchange Traded funds				
Notification if <1 average trade per business day in previous year					
<b>Top five execution venues ranked in terms of trading volumes (descending order)</b>	Proportion of volume traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of Passive orders	Percentage of aggressive orders	Percentage of directed orders
BNY MELLON CAPITAL MARKETS EMEA LIMITED LEI: 21380005FBGOWU89LN14	76.60	91.31	N/A	N/A	N/A
PERSHING SECURITIES LIMITED LEI: 549300NC3GURNOAEZU06	18.75	5.25	N/A	N/A	N/A
MIRABAUD SECURITIES LIMITED LEI: 2138008Z5T6L1ZDWV35	2.62	2.92	N/A	N/A	N/A
INSTINET EUROPE LIMITED LEI: 213800MXAKR2LA1VBM44	2.00	0.50	N/A	N/A	N/A
BANCO INVERSI, S.A LEI: 95980020140005184148B	0,60	0.72	N/A	N/A	N/A

#### A. Execution factors

Andbank Luxembourg has no direct access on any equity markets or ETF markets. Client orders were transmitted to Financial Intermediaries (chosen within our Brokers Best Selection list) for execution on Stock exchanges. This process ensured local settlements at the lowest costs and reduced the risks of unsettled trades.

Accordingly to our best execution policy, no orders on listed equities or ETF's have been executed OTC (over-the-counter).

The relevant factor for the choice of the execution venue is the primary market place assuming that this place is to be considered as the most liquid market.

Equity orders were locally executed and settled implying lowest cost and a very high level of execution likelihood as well as a minimum number of failed trades. It has to be noted that orders for retail clients go exactly in the same chain than professionals orders.

#### B. Affiliations & conflicts of Interest

Andbank Luxembourg has no close links with any entities used for executing our orders in 2020. No situation of a conflict of interest has been detected in 2020.

#### C. Specific financial arrangements with execution venues

Andbank Luxembourg has no arrangements in place with the execution venues for the execution of client orders. No payments, discounts, rebates or non-monetary benefits have been received.

#### D. Changes in venue usage

No changes in the order flow have been processed in 2020. Andbank Luxembourg had neither had changes in venue usage nor experienced factors that would have led to a change in the execution venues listed in its best execution policy

## E. Situations where price and cost were not the primary factors

For most orders of this asset class, the main factors were price and costs based on the most liquid market. It may nevertheless occur that for illiquid assets, the probability of execution factor prevailed.

Class Of Instrument	Debt Instruments: Bonds & Money Market Instruments				
Notification if <1 average trade per business day in previous year	N				
<b>Top five execution venues ranked in terms of trading volumes (descending order)</b>	Proportion of volume traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of Passive orders	Percentage of aggressive orders	Percentage of directed orders
213800MXAKR2LA1VBM44 INSTINET EUROPE LIMIT	100	100	N/A	N/A	N/A
959800R2X69K6Y6MX775 COLEGIO DE REGSITRADORES DE LA PROPIEDAD	100	100	N/A	N/A	N/A
Name and Venue Identifier (MIC or LEI)	N/A	N/A	N/A	N/A	N/A
Name and Venue Identifier (MIC or LEI)	N/A	N/A	N/A	N/A	N/A
Name and Venue Identifier (MIC or LEI)	N/A	N/A	N/A	N/A	N/A

Bonds & MM instruments are the only products that Andbank Luxembourg can treat either directly on a market, or alternatively via a broker for Execution.

Most of the bonds orders are treated directly by Andbank Luxembourg on MTF Bloomberg, in certain specific circumstances it can happen that we have to transmit an order to external broker to get a better execution.

Class Of Instrument	Currency Derivatives				
Notification if <1 average trade per business day in previous year					
<b>Top five execution venues ranked in terms of trading volumes (descending order)</b>	Proportion of volume traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of Passive orders	Percentage of aggressive orders	Percentage of directed orders
21380005FBGOWU89LN14 BNY MELLON CAPITAL	100	100	0	100	0
Name and Venue Identifier (MIC or LEI)	N/A	N/A	N/A	N/A	N/A
Name and Venue Identifier (MIC or LEI)	N/A	N/A	N/A	N/A	N/A
Name and Venue Identifier (MIC or LEI)	N/A	N/A	N/A	N/A	N/A
Name and Venue Identifier (MIC or LEI)	N/A	N/A	N/A	N/A	N/A

BNY MELLON CAPITAL is our only Venue for that activity for costs and efficiency purposes regarding the execution of Currency Derivatives.