Best Execution

Summary of the analysis and conclusions

(Reporting period: 01.01.2019 - 31.12.2019)

In accordance with the EU Markets in Financial Instruments Directive (MiFID II), the German Security Trading Act (WpHG) and the BaFin's Minimum Requirements for the Compliance Function (MaComp), Nomura Asset Management Europe KVG mbH (NAM EU) takes all sufficient steps to obtain the best possible result when executing transactions for clients' portfolios. This is known as "Best Execution". The following is a summary of NAM EU's analysis and conclusions from our monitoring of the quality of the execution in accordance with Article 3 para. 3 of the Delegated Regulation (EU) 2017/576.

1. Equities (tick size liquidity bands 1-6)

In addition to the criteria stated in our Best Execution Policy on broker selections, the following were the dominating factors for the placement of equities orders: price, costs, reliable execution and settlement.

The brokerage services of Instinet, which belongs to the Nomura Group, were assessed in the same way as any other third party brokers providing services to the NAM EU and in accordance with the assessment procedures set out by our Broker Evaluation Committee. There were no conflicts of interests with the top-5 brokers listed in our best execution venues report.

Specific arrangements have not been made with any execution venues/brokers regarding payments made or received, discounts, rebates or non-monetary benefits received.

Any changes to our broker list are approved by the Broker Evaluation Committee.

NAM EU's clients are professional clients. Oder execution did not differ according to the client categorisation.

On a yearly basis, NAM EU reviews the Best Execution policies of the relevant brokers. Brokers are required to list the venues they have access to. NAM EU requires that all these are monitored to ensure the integrity of its trade executions and that our dominating execution factors be the overriding factors when determining the trade routing strategy in their Smart Order Routing.

2. Bonds

In addition to the criteria stated in our Best Execution Policy on broker selections, the following were the dominating factors for execution of bonds: price, reliable settlement, liquidity.

The brokerage services of Nomura international PLC, which is a company of Nomura Group, were assessed in the same way as any other third party brokers providing services to the NAM EU and in accordance with the assessment procedures set out by the Broker Evaluation Committee. There were no conflicts of interests with top-5 brokers listed in our best execution venues report.

Specific arrangements have not been made with any execution venues/brokers regarding payments made or received, discounts, rebates or non-monetary benefits received.

Any changes to our broker list are approved by the Broker Evaluation Committee.

NAM EU's clients are professional clients. Oder execution did not differ according to the client categorisation.

NAM EU assesses annually the quality of our bond counterparties based on the factors laid down in our best execution policy.

3. Money Market Instruments

In addition to the criteria stated in our Best Execution Policy on broker selections, the following were the dominating factors for execution of money market instruments: price, liquidity.

There were no close links, conflicts of interests or common ownerships with the top-5 brokers listed our best execution venues report.

Specific arrangements have not been made with any execution venues/brokers regarding payments made or received, discounts, rebates or non-monetary benefits received.

Any changes to our broker list are approved by the Broker Evaluation Committee.

NAM EU's clients are professional clients. Oder execution did not differ according to the client categorisation.

NAM EU assesses annually the quality of our money market instruments counterparties based on the factors laid down in our best execution policy.

4. Equity Futures

In addition to the criteria stated in our Best Execution Policy on broker selections, the following were the dominating factors for execution of equity futures: price, availability, reliable settlement.

There were no close links, conflicts of interests or common ownerships with the top-5 brokers listed our best execution venues report.

Specific arrangements have not been made with any execution venues/brokers regarding payments made or received, discounts, rebates or non-monetary benefits received.

Any changes to our broker list are approved by the Broker Evaluation Committee.

NAM EU's clients are professional clients. Oder execution did not differ according to the client categorisation.

On a yearly basis, NAM EU reviews the Best Execution policies of the relevant brokers. Brokers are required to list the venues they have access to. NAM EU requires that all these are monitored to ensure the integrity of its trade executions and that our dominating execution factors be the overriding factors.

5. Bond Futures

In addition to the criteria stated in our Best Execution Policy on broker selections, the following were the dominating factors for execution of bond futures: price, availability, reliable settlement.

There were no close links, conflicts of interests or common ownerships with the top-5 brokers listed our best execution venues report.

Specific arrangements have not been made with any execution venues/brokers regarding payments made or received, discounts, rebates or non-monetary benefits received.

Any changes to our broker list are approved by the Broker Evaluation Committee.

NAM EU's clients are professional clients. Oder execution did not differ according to the client categorisation.

On a yearly basis, NAM EU reviews the Best Execution policies of the relevant brokers. Brokers are required to list the venues they have access to. NAM EU requires that all these are monitored to ensure the integrity of its trade executions and that our dominating execution factors be the overriding factors.

6. FX Forwards

In addition to the criteria stated in our Best Execution Policy on broker selections, the following were the dominating factors for execution of FX Forwards: price, availability, reliable settlement.

There were no close links, conflicts of interests or common ownerships with the top-5 brokers listed our best execution venues report.

Specific arrangements have not been made with any execution venues/brokers regarding payments made or received, discounts, rebates or non-monetary benefits received.

BREXIT led to the change of the available counterparties for FX Forwards transactions in 2019. Any changes to our counterparty list are approved by the Broker Evaluation Committee.

NAM EU's clients are professional clients. Oder execution did not differ according to the client categorisation.

In relation to FX Forwards, there were only OTC transactions in the reporting period. Therefore, it is not necessary to use data published under Delegated Regulation (EU) 2017/575 for the assessment of the quality of execution. NAM EU assesses annually the quality of our counterparties for FX Forwards based on the factors of our best execution policy.

7. FX Spots

In addition to the criteria stated in our Best Execution Policy on broker selections, the following were the dominating factors for execution of FX Spots: price, availability, reliable settlement.

There were no close links, conflicts of interests or common ownerships with the top-5 brokers listed our best execution venues report.

Specific arrangements have not been made with any execution venues/brokers regarding payments made or received, discounts, rebates or non-monetary benefits received.

Any changes to our broker list are approved by the Broker Evaluation Committee.

NAM EU's clients are professional clients. Oder execution did not differ according to the client categorisation.

In relation to FX Spots, there were only OTC transactions in the reporting period. Therefore, it is not necessary to use data published under Delegated Regulation (EU)

2017/575 for the assessment of the quality of execution. NAM EU assesses annually the quality of our brokers for FX Spots based on the factors of our best execution policy.