



CARNEGIE AS

RTS 28 3.3 for 2019	Fixed income	FX	Equity&equity like	Equity derivative	ETF	Structured products
(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;	Price and cost most important execution factors.	N/A	Price, likelihood of execution and cost most important execution factors.	Price and cost most important execution factors.	Price and cost most important execution factors.	N/A
(b) a description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders;	None	N/A	None	None	None	N/A
(c) a description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received;	None	N/A	None	None	None	N/A
(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;	No changes.	N/A	Suspended trading on Blockmatch, Sigma-X, Aquis, Bank SP's and ELP SP's due to low execution performance.	No changes.	No changes.	N/A
(e) an explanation of how order execution differs according to client categorisation, where the firm treats categories of clients differently and where it may affect the order execution arrangements;	No differences between client categories.	N/A	No differences between client categories.	No differences between client categories.	No differences between client categories.	N/A
(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;	No other criteria given precedence over price and cost.	N/A	No other criteria given precedence over price and cost.	No other criteria given precedence over price and cost.	No other criteria given precedence over price and cost.	N/A
(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 Commission Delegated Regulation (EU) .../...to be inserted before publication [RTS 27];	Routines for monitoring best execution with internal tools and tools from external vendor.	N/A	Routines for monitoring best execution with internal tools and tools from external vendor.	Routines for monitoring best execution with internal tools and tools from external vendor.	Routines for monitoring best execution with internal tools and tools from external vendor.	N/A
(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.	N/A	N/A	N/A	N/A	N/A	N/A