

BEST EXECUTION POLICY

ICBC (Europe) S.A., Paris Branch

Purpose(s) of the Internal Rule
<p>The purpose pursued under this Policy (the “Policy”) is to ensure compliance with MiFID from the Paris Branch of ICBC (Europe) S.A. (“ICBC Paris” or the “Branch”) in terms of best execution for Retail Clients and Professional Clients when:</p> <ul style="list-style-type: none">- receiving and transmitting the orders of clients, and/or- executing orders on behalf of clients.
Summary of Content(s)
<p>The present Policy describes the organization between ICBC (Europe) S.A., Paris and ICBC Ltd., Luxembourg Branch and the procedures and measures which the Branch has taken to ensure the best execution efforts for its Retail Clients and Professional Clients.</p> <p>This Policy replaces and supersedes any previous or existing versions of a policy or procedure relating to the same object or substance which may have been established by the Branch. Such Policy takes effect immediately.</p>

Best Execution Policy of ICBC (Europe) S.A., Paris Branch

Based on the European Markets in Financial Instruments Directive II (commonly referred to as “**MiFID II**”) as defined below, the Paris Branch of ICBC (Europe) S.A. (the “**Branch**” or “**ICBC Paris**”) has established the following best execution policy.

MiFID Framework

For the purposes of this Policy, the expression “**MiFID Framework**” or “**MiFID**” shall mean:

- Directive 2014/64/EU of the European Parliament and of the Council dated 15 May 2014 on markets in financial instruments (commonly referred to as “**MiFID II**”), as completed by Delegated Directive 2017/593 of the European Commission dated 7 April 2016 and by Delegated Regulation 2017/565 of the European Commission dated 25 April 2016;
- Regulation (EU) No 600/2014 of the European Parliament and of the Council dated 15 May 2014 on markets in financial instruments (commonly referred to as “**MiFIR**”), as completed by Delegated Regulation 2017/567 of the European Commission dated 18 May 2016;
- EU Commission’s Questions & Answers relating to MiFID and MiFIR (“**Q&A**”);
- Regulatory Technical Standards (“**RTS**”) and Implementing Technical Standards (“**ITS**”) of the European Commission, which supplement the Level 1 texts described above;
- ESMA’s guidance and positions relating to MiFID and MiFIR; as well as:
- The French Monetary & Financial Code (“*Code monétaire et financier*”) as well as the General Regulations (“*Règlement général*”) of the French Financial Markets Authority (“*Autorité des Marchés Financiers*”), which implement such requirements and obligations into French law.

Policy owner

Financial Markets Department

General Principles

MiFID sets out requirements to ensure that all sufficient steps are taken to achieve the best possible results for our clients when executing investment orders on their behalf. Non-compliance with these rules is likely to cause a serious threat to our service quality as well as exposes the Branch to significant financial, compliance and reputational risks. Conformity with the processes and procedures outlined in this Policy is therefore crucial to the success of our business.

Scope of application

All the internal departments of the Branch which are involved into the treatment of orders and, in particular, the Financial Markets Department of the Branch (“**FMD**”) – and, when applicable to their respective activities, services or products, the Corporate & Investment Banking Department of the Branch (“**CIB**”) and/or the Banking Department of the Branch (“**BD**”).

Important note: Infringements of any provisions of this Policy by an employee or manager of the Branch may result in disciplinary action, which may lead up to dismissal or termination of employment (or of mandate, as the case may be) in addition to such employee’s or manager’s personal liability being sought and incurred.

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1. Objective of the Policy

In compliance with MiFID, ICBC (Europe) S.A., Paris Branch (“**ICBC Paris**” or the “**Branch**”) has codified a best execution policy for the execution of investment orders and has taken relevant steps necessary to achieve the best possible results (hereinafter referred to as “**Best Execution**”) in relation to receiving and executing orders on behalf of its clients.

For the purposes of the present policy (the “**Policy**”), any instructions for the purchase and/or sale of any financial instruments provided by clients and accepted by the Branch for execution or transmission to third parties are and shall be considered as “orders”.

2. Scope of Policy

These obligations relating to Best Execution apply if the Branch:

- (i) receives and transmits the orders of its clients; and/or
- (ii) executes orders on behalf of its clients.

In general, the Policy will not apply when a client is categorized as an Eligible Counterparty, without prejudice to the right of such entities to request, either on a general form or on a trade-by-trade basis, treatment as professional clients. This Policy is applicable to clients categorized as retail and professional under MiFID. Please consult the Branch’s Client Classification Procedure for additional information on the requirements applicable to the different MiFID-related client classifications.

When dealing with eligible counterparties, the Branch will perform its best efforts to act honestly, fairly and professionally and communicate in a way which is fair, clear and not misleading, taking into account the nature of the eligible counterparty and of its business.

3. Applicable legal and regulatory framework

For the purposes of this Policy, the expression “**MiFID Framework**” or “**MiFID**” shall mean:

- Directive 2014/64/EU of the European Parliament and of the Council dated 15 May 2014 on markets in financial instruments (commonly referred to as “**MiFID II**”), as completed by Delegated Directive 2017/593 of the European Commission dated 7 April 2016 and by Delegated Regulation 2017/565 of the European Commission dated 25 April 2016;
- Regulation (EU) No 600/2014 of the European Parliament and of the Council dated 15 May 2014 on markets in financial instruments (commonly referred to as “**MiFIR**”), as completed by Delegated Regulation 2017/567 of the European Commission dated 18 May 2016;
- EU Commission’s Questions & Answers relating to MiFID and MiFIR (“**Q&A**”);

- Regulatory Technical Standards (“RTS”) and Implementing Technical Standards (“ITS”) of the European Commission, which supplement the Level 1 texts described above;
- ESMA’s guidance and positions relating to MiFID and MiFIR; as well as:
- The French Monetary & Financial Code (“*Code monétaire et financier*”) as well as the General Regulations (“*Règlement général*”) of the French Financial Markets Authority (“*Autorité des Marchés Financiers*”), which implement such requirements and obligations into French law.

4. Organisation

The Branch takes relevant steps to obtain, when executing orders, the best possible results for its clients taking into account price, costs, speed, likelihood of execution and settlement, size, nature or any other consideration relevant to the execution of the order.

In enforcing this principle, the Branch uses the execution services provided by ICBC Ltd., Luxembourg Branch in order to implement sufficient steps to achieve best execution.

ICBC Ltd., Luxembourg Branch is an investment service provider incorporated in the Grand Duchy of Luxembourg and which is approved by the Luxembourgish banking and financial regulator (the “*Commission de Surveillance du Secteur Financier*” or “*CSSF*”). ICBC (Europe) S.A., Paris Branch and ICBC Ltd., Luxembourg Branch are both entities under the ICBC Group (with ICBC Ltd. being the sole shareholder of ICBC (Europe) S.A.), and ICBC Ltd., Luxembourg Branch has its own Best Execution policy, which makes the choice of ICBC (Europe) S.A., Paris Branch to route all execution orders to ICBC Ltd., Luxembourg Branch as good as executing the orders by the Branch itself.

Therefore, the selection and execution policy of ICBC Ltd., Luxembourg Branch is effective and shall apply to the clients of the Branch.

The policy set out within this Policy therefore details the terms of the Best Execution Policy of ICBC Ltd., Luxembourg Branch. For the sake of clarity, when used in this Policy the expressions the “**Bank**” or “**ICBC**” refer both to ICBC Ltd., Luxembourg Branch and to ICBC (Europe) S.A., Paris Branch. The term “head office” refers to ICBC Ltd. incorporated in Beijing, People’s Republic of China. All trading activities are performed by/routed via the entity ICBC Ltd., Luxembourg Branch acting as an intermediary for ICBC (Europe) S.A. Since both entities share the same management, human resources and control functions, this Policy applies validly to both entities. Differences or provisions only applicable to a specific entity are indicated expressly herein, if applicable parts of this Policy only apply to one specific entity.

5. Principles of this Policy

In accordance to its obligation to act fairly and professionally, the Bank will take necessary and relevant steps in order to obtain the best possible result for executing its clients' orders.

In order to achieve this aim, the Bank will take into account a number of execution factors (unless otherwise instructed by clients, as reflected under Chapter 7 of this Policy), including:

- The price of the instruments;
- The cost of execution;
- The speed of execution;
- The likelihood of execution and settlement;
- The size and the nature of the orders or any other consideration relevant to the execution of the orders.

The relative importance of the factors listed above will depend on:

- Clients' characteristics (including client classification);
- The characteristics of the order;
- The characteristics of the financial instruments related to the orders;
- The characteristics of the execution venue(s) to which the order can be directed.
- The characteristics of the execution counterparty(s) to which the order can be directed.

For retail clients, total consideration (i.e. the sum of the price and the costs incurred by clients including all expenses which are directly relating to the execution of the order, including execution venue fees, clearing and settlement fees and any other fees paid to third parties involved in the execution of the order) will be the determinant factor of execution quality.

The Bank would like to highlight the fact that the Best Execution obligation is an obligation of means and not of results. In other words, the Bank will take necessary and relevant steps in order to obtain the best possible result for the execution of its client's order.

The Bank is not deemed to obtain the best result for each order. However, the Bank is able to prove, on request, that orders have been executed according to the Policy, which enables the Bank in most of cases to obtain the best possible result.

6. The Bank's approach to Best Execution

In accordance with MiFID requirements and in order to obtain the best possible result for our clients, the Bank gives its clients, in respect of each class of instruments it deals with, information on the different venues where the Bank executes clients' orders and the factors affecting the choice of execution venues.

Under MiFID, an "execution venue" means a regulated market, an MTF, an OTF, a Systematic Internaliser, or a market maker or other liquidity provider or an entity that performs a similar function in a third country to the functions performed by any of the foregoing.

The Bank will summarize and make public on an annual basis for each class of financial instruments, the top five investment firms & top five venues in terms of trading volumes where it transmitted or placed client orders for execution in the preceding year and information on the quality of execution obtained.

The Bank will provide the information about entities where the orders are transmitted or placed for execution when require by its clients or potential clients.

▪ Bonds

The factors of price, liquidity, likelihood of execution and settlement size, credit risk, rating and maturity are important and the relative importance of each of them may differ from one order to the other.

In the event where prices are not available on a Multilateral Execution Venue, the Bank will obtain quotes from available Market Makers (please see Annex B to this Policy for the approved execution venues for Bonds) who have sufficient policies and procedures in place to ensure the fairness of the price.

- The client's order should contain a clear limit price. Upon reception of the order, the Bank asks the Market Makers via Bloomberg for quotes;
- Only when the order's limit price has been reached (after deducting the charges), then the order will be filled. And the client will be informed in a timely fashion.
- The Market Makers (ICBC's trading centers) chosen are trustworthy and reputable entities, guaranteeing a high likelihood of execution;
- The available clear limit price will guarantee access to the best price possible. And before the Bank places a client's order to the intra-group trading center, the Bank will clearly inform the client about the nature of the trade (OTC) and gather the client's consent.

For OTC transactions, the Bank will take the necessary and reasonable actions to ensure the client can get the best price which heavily depends on the liquidity of the bond. The Bank will check the fairness of the price proposed to the client by gathering market data used in the estimation of the price of such product and, where possible, by comparing with similar or comparable products.

▪ **FX Derivatives (forwards and swaps)**

The factors of size, likelihood of execution and settlement, liquidity, counterparty, credit risk, rating and maturity are important and the relative importance of each of them may differ from one order to the other.

FX derivatives are only executed for professional clients after signing a specific related agreement for derivative services. These clients have direct access to the Financial Markets department of the Branch.

The Bank uses MTFs (see Annex B to this Policy, for further details) to execute FX products. If no price is available on the MTF, it will trade with selected Market Makers mentioned in Annex B to this Policy. In such scenarios, the FX Execution Trader will transact directly with the selected Market Maker and take all reasonable steps to obtain the best possible result for the client.

- Before trading with its clients, the Bank will clearly inform the client about the trading venues and charges concerned with the transaction (at least with an illustration).
- When executing orders OTC, the Bank will check the fairness of the price proposed to the client by gathering market data used in the estimation of the price of such product and, where possible, by comparing with similar or comparable products.

▪ **UCITS Funds**

Funds can be only subscribed to and redeemed in one place (with the investment fund manager/administrator of the fund), and at one price (the net asset value (NAV)). As there is no discretion with regards to Execution Venue and/or price, the Bank will execute the client's orders with the respective transfer agent of the fund to minimize the total consideration.

7. Execution venues sourcing

The Bank typically sources quotes from multiple Execution Venues before accepting the quote that it considers achieving the best results for the client, following an assessment and comparison of all available Execution Venues. Such a conclusion can be expected to aim for optimized:

- core price (exclusive of any transaction costs);
- certainty of execution; and
- cost of execution.

The Bank may, in specific cases, obtain quotes only from a single Execution Venue, if:

- the financial instrument is bespoke;
- the financial instrument is illiquid;
- It has been determined using market data and quality of execution metrics the results of which no alternative entity could improve on.

When the Bank obtains quotes from a single Market Maker for OTC financial instruments, it will comply with the additional Best Execution requirements by ensuring that it conducts price fairness checks on a systematic basis and embeds these checks in its policies and procedures. The periodic review of the procedure is designed to support the conclusion that the Bank is able to consistently get the best results for their clients over time.

8. Execution venues annual evaluation

On an annual basis, the Bank will formally review whether best execution was achieved satisfactorily. Such reviews will be conducted by means of reports and measurements presented by the Bank. The Risk Management Department (“RMD”) takes the lead for this review with the support of FMD. RMD sends a notice to FMD for requesting the below information and, based on such information provided to them, consolidates an annual evaluation report for such purposes and submits it to the Authorized Management for its review. Such reports will contain, among other analysis:

- ranking of Execution Venues on the basis of actual usage by the involved Trading Desk (by volume) (provided by the Financial Markets Department);
- comparison of this ranking with the ranking based on public “quality of execution” data that is required to be published by Execution Venues under MiFID. Such rankings will be based on certain key quality of execution parameters (provided by the Financial Markets Department);
- ranking of total costs related to the execution of trades of each venue (provided by the Financial Markets Department);
- ranking of clearing schemes (quality and cost of clearing and settlement);
- ranking of accuracy and efficiency of circuit breakers in extreme market conditions to prevent market disruptions(provided by the Financial Markets Department);
- ranking of liquidity and ability to support large size orders (provided by the Financial Markets Department);
- the credibility of the venue members.

Significant misalignment between the rankings based on actual usage volume and those based on the public ‘quality of execution data’ will be investigated by FMD and RMD, and it will be determined whether such misalignment can be justified qualitatively, or whether corrective actions should be taken in its review of Execution Venue usage during the year.

9. Client specific instructions

Whenever the client gives a specific instruction with regard to the handling of an order, the Bank will carry out the order accordingly. The Best Execution obligation is met if the order is executed according to the specific instruction. However, the Best Execution principle still applies to those aspects of the order which would not be covered by the specific instruction. The Bank shall refrain from inducing a client to issue specific instructions when he/she reasonably ought to know that such instructions could affect the best execution of the order.

Where the Bank has accepted a client's specific instructions with respect to the execution of orders, the Bank will follow them to the extent it is possible to do so. The client should be made aware that, to the extent that the Bank accepts and follows their instructions, the Policy will not be applicable, although the Policy will be applicable to other execution factors to the extent that they are not covered by the client's instructions.

10. Client's consent for executing transactions outside regulated markets or MTFs

The Bank may execute all or part of a client's order outside of a Regulated Market, MTF or OTF. The Bank is required to obtain the prior express consent of its clients before being able to execute their orders outside a regulated market, a MTF or an OTF. To this end, every client must give consent to the Branch by sending the "*Consent to the execution of orders outside a regulated market, a multilateral trading facility or an organized trading facility*" form (attached in Annex C to this Policy) duly completed and signed.

11. Special situations

- **Aggregation of orders**

The Bank's order handling may involve the aggregation of orders of different clients. Where orders are aggregated this will occur in accordance with the relevant MiFID requirements. The executed orders are allocated to clients fairly and proportionately in accordance with the Bank's Client Orders Handling procedure.

- **Abnormal market conditions**

This Policy will not apply at a time of severe market turbulence and/or internal or external system failure where instead the ability to execute orders on a timely basis, or at all, will become the primary factor. In the event of system failure where we may not be able to access all of our chosen execution venues, clients will be notified when placing an order if this condition has been invoked.

12. Commissions

The Bank does not structure or charge its commissions in such a way as to discriminate unfairly between execution venues.

13. Additional considerations

The Bank will always inform the clients timely about every difficulty concerning the accurate execution of their transactions.

In a situation where the Bank places a transaction with different counterparties, the price will be determined by calculating the average price of all tranches. The final execution time of transaction will be the point of time the final tranche of the order is executed.

In case clients request demonstration of Best Execution from the Bank for one or more transactions, the following process will apply:

- The Head of Financial Markets Department of the Branch is responsible for preparing a document showing that the best execution policy was applied:
 - Explanation of the criteria applied when selecting execution venues;
 - Support documentation that the execution venue was selected according to the outlined criteria;
 - Support documentation that best price available was chosen (print screen of prices available from trading platforms and/or records from phone calls);
- The Risk Management Department / Compliance function / Legal function will each review and give an opinion on the prepared document;
- The Relationship Manager of the concerned client in the relevant Front Office of the Branch will hand over and explain the document as well as remaining at disposal for further questions.

The Financial Markets Department of the Branch will forward such requests by its direct clients to ICBC Ltd., Luxembourg branch, to which it routes all execution orders, in order to obtain the records and documents.

14. Top 5 venues

The Bank shall publish the annual top five execution venues in terms of trading volumes for all executed professional clients on website. And the analysis shall be published in the format and contain the following information listed set out in Annex D to this Policy. The publication shall exclude orders in Securities Financing Transactions (SFTs).

The Bank shall publish, for each class of financial instruments, a summary of the analysis and conclusions drawn from the detailed monitoring of the quality of execution obtained on the execution venues where the Bank executed all profession client orders in the previous year. The information shall include (if applicable):

- (a) an explanation of the relative importance the Bank 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 Bank's execution policy, if such a change occurred;
- (e) an explanation of how order execution differs according to client categorization, where the Bank treats categories of clients differently and where it may affect the order execution arrangements;
- (f) an explanation of how the Bank has used any data or tools relating to the quality of execution, including any data published in accordance with Annex D to this Policy.

The Bank will also publish, for each category of financial instrument and on a yearly basis, the identities of the 5 counterparties where the largest volume of orders has been executed, together with an abstract of the regular assessment performed on the quality of the execution services.

Such report will be published and remain available, at least for two years, on the ICBC (Europe) S.A., Paris Branch's website: paris.icbc.com.cn

15. Conservation & Transmissions of Data

The Bank records and retains data relating to its execution and selection policy. Records are retained for five years on a durable medium and are sent to the client upon request. These records may also be sent to any competent authority or agency when requested under applicable laws and regulations.

16. Monitoring of Execution Quality

The Bank undertakes continuous monitoring and quality assurance efforts to ensure the effectiveness of its Best Execution Policy. In this context, the following Level 1 and Level 2 activities are performed:

Level 1 controls:

a) List of Execution Venues used not covered by the Best Execution Policy

List in situations where trades are performed with execution venues not covered by this Policy as well as adding an adequate justification of the usage.

b) Test trade for Market Makers administering own trading platforms

For Market Makers using their own trading platforms instead of the systems provided by Bloomberg or Reuters, an evaluation of the capacity and the performance of the trading platform is performed through a NPAP (New Product Approval Process) before that trades take place. All members of the Financial Markets department are responsible to ensure that a NPAP procedure is performed when necessary.

The full procedure of NPAP is detailed in the *"Principle and Procedure for the Assessment and Approval of a New Product"*.

c) Information of clients with more than one execution issue (for current month)

Each member of the Financial Markets Department is responsible for informing the Relationship Manager regarding orders of their clients which encountered execution issues (e.g. failed orders due to limit orders that expired and other issues).

d) Consistency of costs and conditions agreed with Market Makers

An assigned member of the Financial Markets Department is responsible for producing a costs and conditions consistency check, with the agreement of each specific Market Maker used.

Level 2 controls:

a) Deviation between quoted and execution price

An assigned member of the Risk Management Department is responsible for producing a monthly deviation analysis between quoted and execution price for each Market Maker, with the support of the Financial Markets Department.

b) Delays in internal transmission processes

The Permanent Control Department is responsible for performing a review of the delay on risk-based approach with the support of FMD and RMD.

17. Selection of Brokers and Execution Venues

The following section shall only apply if and to the extent that the Bank has engaged or entered into (or contemplated to enter into) any third party brokers or intermediaries with respect to the execution of orders on financial instruments.

Broker Selection

The Bank chooses its third-party brokers in accordance with a grid of criteria, the main ones being: the quality of the order execution procedures, connectivity, financial strength, the quality of post-trade processing, the documentation provided concerning the execution and/or best selection policy, and the overall quality of the relationship and the service offered. This order transmission to external traders enables the Bank to obtain execution prices and connectivity that are more attractive to its clients. For the purposes of its order reception/transmission activity, the Bank relies on the “best execution” policies and procedures of each of the external traders selected.

A Review Committee meets at least once each year, and indicates whether or not the selection of external traders has been confirmed. The main external traders used by the Bank to execute or transmit its orders are questioned in writing on the basis of a questionnaire and reports providing evidence of “best execution”. The external traders that are subject to the review must represent at least 90% of the transactions transmitted by the Bank.

Execution venues selection process

The selection of an execution venue is based on qualitative criteria such as the use of a clearing house, the reliability of the circuit breakers, the IT security, the transparency of the price formation process (pre-trade), the simplicity of the execution mechanisms, the diversity of the services offered (extended trading hours and types of orders offered), the financial strength and the possibility of providing clients with comprehensive and intelligible information about the execution mechanisms.

If the Bank is concerned about the reliability and robustness of a venue and/or the long-term survival of its activity, it may take the view that this could have an impact on its ability to provide “best execution” and therefore result in it excluding said venue from its execution policy. Another possible venue selection criterion can be a connection request from clients wishing the presence of the Bank on the venue.

The Bank carries out regular random checks on the quality of execution obtained so as to ascertain whether the venues it uses continue to enable it to provide “best execution”.

18. Annual review

The Financial Markets Department of the Branch will arrange at least an annual review of this Best Execution Policy.

The Policy will also be reviewed at their initiative in case a material change occurs, in particular when triggered by the following events (list not exhaustive):

- changes in the applicable legal or regulatory framework relating to MiFID;
- significant organizational changes to the departments and functions involved in the best execution process;
- the Bank is, on a continuous basis, not able to achieve the best possible result for the clients.

For the purpose of the review process, a discussion will take place during a management meeting by the members of the General Management, the Head of Risk Management, the Head of Financial Markets and the Head of the Compliance function of the Branch.

The Branch will further arrange to notify any substantial change of execution measures, or of its own Best Execution Policy directives, by providing at least a summary to clients via the agreed measures of communication with the client.

For the sake of the review process, the Branch will leverage on the monthly and periodic monitoring efforts described in the previous section to ensure the reliability of the execution venues used for achieving the best possible result for its clients. Furthermore, the Branch will perform an evaluation of the market, assessing whether the chosen venues still offer the best terms and conditions with regard to the Best Execution principals set by this Policy.

The review process will be documented as follows:

- Synthesis of conclusion and signature from the Authorized Management of the Branch.
- Copy of the former and renewed Best Execution Policy (with a marked up or compared Word version showing the changes) in case any changes become necessary and are implemented.

19. Consent

Clients will be provided with this Best Execution Policy or with a summary of the Best Execution Policy. The Branch will seek consent to it, prior to executing or transmitting orders.

20. Responsibilities

The Branch takes all sufficient measures to obtain the best possible result for its clients. However, this provision does not, in any way, constitute an obligation of results and therefore shall be assessed in the context of its obligation of means.

The Branch may not be considered responsible for the non-execution or incorrect execution of orders resulting from “*force majeure*” circumstances preventing it from fulfilling any of its obligations.

Finally, the Branch may not be considered responsible for unfavorable circumstances consecutive to the execution of specific client instructions.

Annex A – Definitions

- **Execution criteria:** Indicates the criteria listed in Chapter 5 of this Policy.
- **Execution factors:** Indicates the factors listed in Chapter 5 of this Policy.
- **MiFID II:** Directive 2014/65/EU OF 15 May 2014, commonly known and referred to as “Markets in Financial Instruments Directive II”, and its rules and application directives and any possible subsequent changes made thereto.
- **Order:** An instruction to purchase or to sell a financial instrument accepted from the Bank for execution or transmission to a third counterparty
- **Systematic Internaliser:** An investment firm that deals on own account by executing client orders in shares outside a regulated market or MTF, and performs that activity on an “organized, frequent and systematic basis”.
- **Intermediary:** For the sake of this policy an intermediary refers to any kind of broker providing access to regulated market or MTFs or market makers quoting bid and offer prices for specific financial instruments on OTC-markets.
- **Market Maker:** An institution or individual that quotes bid and offer prices for specific stocks or other marketable securities that it holds in inventory (often referred to as 'makes a market in'), and is prepared and able to buy or sell those securities at any time on its own account.
- **Multilateral Trading Facility (“MTF”)** - a multilateral system, managed by an investment company or a market operator that brings together multiple counterparty buyers and offerers interested in financial instruments - within the system and in compliance with non-discretionary rules – in a contractual manner that complies with the rules contained in Title II of the MiFID II Directive.
- **OTC:** “Over The Counter” this term refers to a method of exchange of financial instruments in a context different from that of the regulated markets.
- **Trading venue:** refers to a regulated market, a multilateral trading facility (MTFs) or an Organized Trading Facility.
- **Execution venue:** refers to a regulated market, a Multilateral Trading Facility (MTF), a systematic internaliser or a market maker or other “liquidity providers” or entities performing similar functions in a third country to the functions performed by any of the foregoing.
- **Financial Instruments:** In scope of this Policy are all financial instruments as defined under MiFID.

Annex B – List of approved Execution Venues

- Bonds

Market Maker	Type	LEI
Bloomberg Trading Facility Limited	MTF	
ICBC trading center London	Market Maker	5493002ERZU2K9PZDL40
ICBC trading center New-York	Market Maker	5493002ERZU2K9PZDL40
ICBC trading center Hong-Kong	Market Maker	5493002ERZU2K9PZDL40
ICBC ASIA LTD	Market Maker	549300RB8ZUQ2QO5HJ15
ICBC Standard Bank PLC	Market Maker	F01VVKN4DRF2NWKGGQ283

- FX forwards and swaps

Market Maker Name	Type	LEI
Bloomberg Trading Facility Limited	MTF	
360T MTF	MTF	
Thomson Reuters FXALL	MTF	
ICBC Ltd.,H.O.	Market Maker	5493002ERZU2K9PZDL40
Merrill lynch international	Market Maker	GGDZP1UYGU9STUHRDP48
Credit Agricole Corporate and Investment Bank	Market Maker	1VUV7VQFKUOQSJ21A208
Commerzbank ag frankfurt	Market Maker	851WYGNLUQLFZBSYGB56
ICBC standard bank plc	Market Maker	F01VVKN4DRF2NWKGGQ283
Stand chartered bank london treasury	Market Maker	RILFO74KP1CM8P6PCT96
UBS AG zurich	Market Maker	BFM8T61CT2L1QCCEMIK50
HSBC Hong-Kong	Market Maker	MP6I5ZYZBEU3UXPYFY54
Zurich cantonal bank-zuercher kantonalbank	Market Maker	165GRDQ39W63PHVONY02
Societe Generale	Market Maker	O2RNE8IBXP4R0TD8PU41
Goldman Sachs International	Market Maker	W22LROWP2IHZNBB6K528
ICBC (London) Plc	Market Maker	2138003HW6485HGVSH88
Australia and New Zealand Banking Group Limited	Market Maker	JHE42UYNNWWTJB8YTTU19
Natexis Banque	Market Maker	KX1WK48MPD4Y2NCUIZ63
ICBC SG RMB Clearing Bank	Market Maker	5493002ERZU2K9PZDL40
Coöperatieve Rabobank U.A.	Market Maker	DG3RU1DBUFHT4ZF9WN62
Deutsche Bank London	Market Maker	7LTFWFZYICNSX8D621K86
Ing Bank Nv	Market Maker	3TK20IVIUJ8J3ZU0QE75
Standard Bank Of South Africa	Market Maker	QFC8ZCW3Q5PRXU1XTM60
Icbc Asia Ltd Hk	Market Maker	549300RB8ZUQ2QO5HJ15
Zuercher Kantonalbank	Market Maker	165GRDQ39W63PHVONY02
HSBC bank plc	Market Maker	MP6I5ZYZBEU3UXPYFY54

Annex C – OTC Consent

Consent form to the execution of orders outside a regulated market, a multilateral trading facility or an organized trading facility

Under the Markets in Financial Instruments Directive - 2014/65/EC - which applies from 3 January 2018, we are required to:

- inform you that in executing orders on your behalf we may have to execute orders outside of a regulated market, a Multilateral Trading Facility (“**MTF**”) or an Organized Trading Facility (“**OTF**”); and
- seek your consent to execute orders in this manner.

Where we execute your orders outside of a regulated market, a MTF or an OTF it shall be because we have determined that such an alternative manner of execution is the most appropriate for the fulfillment of your order in order to achieve the best possible result.

Please sign this letter and return it to Industrial and Commercial Bank of China (Europe) S.A., Paris Branch by one of the means below. You should be aware that, if we are unable to obtain your consent as set out in this letter, the law may prohibit us from executing orders for you outside a regulated market, a MTF or an OTF.

- **by e-mail to:** fmd@fr.icbc.com.cn
- **by postal mail to:** Financial Markets Department – ICBC Paris – 73 Boulevard Haussmann 75008 Paris, France

Company name

I hereby consent to Industrial and Commercial Bank of China (Europe) S.A., Paris Branch executing orders on my behalf outside of a regulated market, a MTF or an OTF.

Signed by the authorised representative(s) having the authority to open accounts and nominate authorised agents:

Signed _____

Name _____

Title _____

Date _____

We encourage you to keep a copy of the consent for your records.

Annex D – Top five venues template

Top five execution venues and quality for execution obtained for professional client					
Class of Instrument :					
Notification if <1 average trade per business day in the previous year :			Y/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
1. Name and Venue Identifier (MIC or LEI)					
2. Name and Venue Identifier (MIC or LEI)					
3. Name and Venue Identifier (MIC or LEI)					
4. Name and Venue Identifier (MIC or LEI)					
5. Name and Venue Identifier (MIC or LEI)					



Top 5 venues template.xlsx

Included here is a spreadsheet template ready for use