

2019 RTS28 Report - Summary of the analysis

With the entry into force of the MiFID II, le Crédit Industriel et Commercial (CIC) as an investment firm has the annual obligation to publish on its website reporting tables related to the execution of orders transmitted by its customers (at Y-1) as well as the analysis of these results in respect with the best execution policy of the group.

RTS 28 supplements MiFID Directive with regulatory technical standards and specifies the elements to mention:

- 1) Assessment of the best execution obligation: the top five venues where the investment firm executed client orders in the preceding year.
- 2) Assessment of the best selection obligation: the top five brokers used by the investment firm to execute client orders.
- 3) Summary of the analysis and conclusions after detailed monitoring of the quality of execution for the previous year.

In accordance with the regulations in force, the CIC makes available on its website its best execution and selection policy which sets out all the sufficient measures that the entity implements, in order to obtain the best possible result for its clients, when executing orders on financial instruments (order execution policy on financial instruments) and selecting intermediaries to whom it sends orders from its clients for execution (policy of best selection of intermediaries).

As part of this requirement, below is a summary of the CIC's analysis and the conclusions it draws from the detailed monitoring of the quality of execution: This document covers the activities of CIC acting as an investment service provider carrying out the trading service on behalf of third parties (Sell Side). The other CIC activities (Buy-Side, retail banking) are the subject of another summary available on the website.

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;

In order to seek the best result, the CIC considers the following factors in the absence of specific instructions:

- costs payable by client as a result of the execution
- speed of execution and settlement,
- nature of transaction,
- the purchase price of the financial instrument (or execution price),

- likelihood of execution and settlement,
- security of treatment of transactions and transfer of ownership,
- size (number of securities bought or sold),
- any other consideration that is relevant to execution.

The CIC may also take into account in its execution policy qualitative factors depending on the category of the clientele involved: diversity of services offered, reliability and robustness of a platform, impact on the market of an order, etc.

These elements are detailed in Crédit Mutuel Alliance Fédérale's execution policy available on the CIC website.

b) A description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders;

There are no close links, conflict of interests, and common ownerships with respect to any execution venues used to execute orders.

Any transaction or link between the CIC, the service providers or platforms is carried out in accordance with Crédit Mutuel Alliance Fédérale's conflict of interest policy.

These elements are detailed in the policy on the prevention of conflicts of interest that is available on the website.

c) A description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received;

There are no 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 firm's execution policy, if such a change occurred;

The service providers listed in the appendix to Crédit Mutuel Alliance Fédérale's execution policy are subject to a permanent accreditation and monitoring process, which includes regular evaluations of the quality performance of the executed services.

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;

Non applicable: All orders transmitted to CIC Market Solutions for execution are sent by professional clients

For further information, please refer to the Credit Mutuel Alliance Federal Order Execution Policy.

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;

Non applicable: All orders transmitted to CIC Market Solutions for execution are sent by professional clients

For further information, please refer to the Credit Mutuel Alliance Federal Order Execution Policy.

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) 2017/575 to be inserted before publication (RTS 27);

In the year of 2019, CIC used external tools to ensure the best execution practice or the RTS 27

CIC monitors the quality of execution provided by the execution sites and contractors used to execute client orders.

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;

Non applicable.