

# RTS 28 Summary Analysis

In accordance with the MiFID II best execution obligation, Danske Bank A/S takes all sufficient steps to obtain the best possible result when executing or transmitting orders on behalf of our retail and professional clients, taking into account the execution factors, which include price, costs, speed, likelihood of execution and settlement, size, nature or any other consideration relevant to the execution of the order.

To ensure that we constantly are able to deliver best execution to our clients, we monitor on an ongoing basis the quality of execution provided by venues and brokers, and whether these continue to meet our standards.

This report provides a written summary of the analysis and conclusions drawn from our best execution monitoring, together with a list of the top five execution venues and brokers used to execute retail and professional client orders in each class of financial instrument, as per article 3(3) of Commission Delegated Regulation (EU) 2017/576 of 8 June 2016 supplementing Directive 2014/65/EU ("MiFID II").

Danske Bank A/S may act as an execution venue in a financial instrument when executing client orders in the capacity of being a systematic internaliser, market maker or liquidity provider, and may accordingly appear as a top five execution venue. Per definition, Danske Bank A/S will not act as a broker when executing client orders, and will consequently not appear among top five brokers.

The report contains combined information for both Danske Bank's Corporates & Institutions and Asset Management, both of which are a part of Danske Bank A/S, and covers all retail and professional client orders executed on an execution venue or transmitted to a broker in the following classes of financial instruments, which you can trade with us;

Equities - Shares & Depository Receipts .....	2
Debt Instruments .....	10
Interest Rates Derivatives .....	16
Currency Derivatives .....	22
Structured Finance Instruments .....	28
Equity Derivatives .....	32
Securitized Derivatives .....	38
Commodities Derivatives and Emission Allowances Derivatives .....	44
Contracts for Difference .....	47
Exchange Traded Products (Exchange traded funds, exchange traded notes and exchange traded commodities) .....	52

## *RTS 28 Summary Analysis - Equities – Shares & Depositary Receipts*

- Tick size liquidity bands 5 and 6 (from 2000 trades per day) – Highly liquid shares
- Tick size liquidity bands 3 and 4 (from 80 to 1999 trades per day) – Medium liquid shares
- Tick size liquidity band 1 and 2 (from 0 to 79 trades per day) – Less liquid shares

### **Explanation of the relative importance we 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;**

When you place an order with us in shares & depositary receipts, and for our portfolio management services when we take decision to deal on your behalf, we may execute the order on an execution venue (including being an execution venue ourselves) or by sending the order to an external broker for execution.

When we assess the quality of execution for shares & depositary receipts, the main execution factors we consider are execution price and costs.

Secondary execution factors we take into account when assessing the quality of execution are speed, likelihood of execution, type & size of the order, and settlement.

In the assessment and selection of execution venues and brokers where we believe we can consistently obtain best execution in shares & depositary receipts for our client, we consider qualitative factors such as market access, market share, liquidity, market knowledge & product specialization, market price transparency, order handling process, ratings and trading costs.

To ensure that we are consistently able to deliver best execution to our clients, we monitor on an ongoing basis the quality of execution obtained from the execution venues and brokers used to execute client orders in shares & depositary receipts. Our monitoring consists both of trade by trade monitoring and overall trend monitoring of the performance of the execution factors.

For a detailed description of how we carry out client orders, application of execution factors and how we prioritise the factors, please refer to our Order Execution Policy.

### **Description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders;**

Danske Bank A/S does not have any close links, conflicts of interests, or common ownerships with respect to any external execution venues or brokers used to execute client orders in shares & depositary receipts.

Any dealing or relationship between units within Danske Bank A/S is conducted in accordance with Danske Bank A/S's Conflict of Interest Policy. For further information please see our Order Execution Policy including the Portfolio Management Addendum.

### **Description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received;**

Danske Bank A/S does not have any specific arrangements with any external execution venues or brokers used to execute client orders in shares & depositary receipts regarding payments made or received, discounts, rebates or non-monetary benefits received.

Any dealing or relationship between units within Danske Bank A/S is conducted in accordance with Danske Bank A/S's Conflict of Interest policy. For further information please see our Order Execution Policy including the Portfolio Management Addendum.

### **Explanation of the factors that led to a change in the list of execution venues listed in our execution policy, if such a change occurred;**

Since publication of our previous RTS 28 Summary Analysis for 2019, we have made changes in the list of execution venues and brokers listed in our Order Execution Policy used for execution of shares & depositary receipts. The factors that led to a change in the list of execution venues and brokers correspond to the main execution factors and qualitative factors stated above, which we use in the assessment and selection of execution venues and brokers.

**Explanation of how our order execution differs according to client categorisation, where we treat categories of clients differently and where it may affect our order execution arrangements;**

In general, we treat categories of clients in scope of best execution equally in terms of order execution.

For retail clients, the best possible result will be determined in terms of the total consideration. Total consideration means the price of the financial instrument together with the costs related to execution, including all expenses incurred by the client that are directly related to the execution of the order.

For professional clients, the best possible result will usually be determined by price and cost, but may be dependent on other execution factors, such as size and type, specific to the order given.

For a detailed description of how we carry out client orders in shares & depositary receipts, please refer to our Order Execution Policy.

**Explanation of whether we have given other criteria 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;**

For retail clients, the best possible result will always be determined in terms of the total consideration, being the price of the financial instrument together with the costs related to execution, including all expenses incurred by the client that are directly related to the execution of the order.

However, if you as a retail client provide us with instructions regarding an order or any aspect of an order, we will execute the order in accordance with such instructions to the extent reasonably possible, which may prevent us from taking the steps to execute at the best prices and/or costs.

**Explanation of how we have used any data or tools relating to the quality of execution, including any data published under Commission Delegated Regulation (EU) 2017/575 of 8 June 2016 [RTS 27];**

We monitor the quality of execution provided by the execution venues and brokers used to execute client orders in shares & depositary receipts on a consistent basis, using automatic monitoring tools. In such monitoring we always strive to use external and independent market data against which to compare our execution quality, e.g. the use of order and quote data from third party venues and brokers to assess our execution prices.

Our monitoring also includes exception-based controls, with results reviewed by a specialist team together with front office staff.

For information on our best execution monitoring, please refer to our Order Execution Policy.

Under MiFID II Art. 27(3) and Commission Delegated Regulation (EU) 2017/575 (RTS 27), execution venues are required to publish a range of information on execution quality on a quarterly basis. Being an execution venue ourselves for execution of shares & depositary receipts, we publish information on execution quality on a quarterly basis. The information on execution quality can be found on our website: <https://danskebank.com/bestexecution>

**Where applicable, an explanation of how we have used output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU;**

Currently not applicable as no such data have yet been published in accordance with Article 65 of Directive 2014/65/EU (MiFID II Directive).

**Summary of the analysis and conclusions drawn from our monitoring of equities – shares & depositary receipts;**

We believe that the analysis and conclusions drawn from our monitoring of the quality of execution confirm that the execution venues and brokers used to execute client orders in shares & depositary receipts meet our standards in delivering best execution to our clients on a consistent basis.

A list of our top five execution venues and brokers used to execute retail and professional client orders can be found below together with detailed information on the volume and number of orders executed by each execution venue and broker. A list of all major execution venues and brokers used to execute client orders in shares & depositary receipts can be found on our website: <https://danskebank.com/bestexecution>

## Top five venues and brokers – Equities - Shares & Depositary Receipts

### Top five venues

**Table I – Retail clients**

Class of Instrument	Tick size liquidity bands 5 and 6 (from 2000 trades per day)				
	Top five execution venues ranked in terms of trading volumes (in descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders <sup>1</sup>	Percentage of aggressive orders <sup>2</sup>
XCSE - NASDAQ COPENHAGEN A/S	41.54 %	34.32 %	4.98 %	1.58 %	0.00 %
BCXE - CBOE EUROPE EQUITIES	17.41 %	22.28 %	21.58 %	76.54 %	0.00 %
DASI - DANSKE BANK A/S - SYSTEMATIC	15.75 %	10.02 %	0.00 %	100.00 %	0.00 %
XSTO - NASDAQ STOCKHOLM AB	9.25 %	10.27 %	21.53 %	5.62 %	2.66 %
XHEL - NASDAQ HELSINKI LTD	6.87 %	9.37 %	2.89 %	1.77 %	0.00 %

**Table II – Professional clients**

Class of Instrument	Tick size liquidity bands 5 and 6 (from 2000 trades per day)				
	Top five execution venues ranked in terms of trading volumes (in descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders
XSTO - NASDAQ STOCKHOLM AB	39.32 %	38.92 %	54.59 %	8.25 %	0.9 %
XCSE - NASDAQ COPENHAGEN A/S	28.30 %	19.01 %	54.12 %	15.49 %	0.19 %
BCXE - CBOE EUROPE EQUITIES	16.53 %	22.12 %	66.16 %	33.31 %	0.00 %
TRQX - TURQUOISE	6.19 %	4.12 %	76.88 %	23.07 %	0.00 %
XHEL - NASDAQ HELSINKI LTD	5.32 %	4.75 %	49.06 %	20.72 %	0.11 %

<sup>1</sup> Orders entered into the order book that provided liquidity

<sup>2</sup> Orders entered into the order book that took liquidity - where Danske Bank A/S is the execution venue, all orders are defined as taking liquidity

<sup>3</sup> Orders where a specific execution venue was specified by the client prior to execution of the order

**Table I – Retail clients**

Class of Instrument	Tick size liquidity bands 3 and 4 (from 80 to 1999 trades per day)				
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Top five execution venues ranked in terms of trading volumes (in descending order)					
XCSE - NASDAQ COPENHAGEN A/S	38.54 %	32.63 %	3.50 %	1.60 %	0.01 %
XSTO - NASDAQ STOCKHOLM AB	20.10 %	21.72 %	8.14 %	5.43 %	1.28 %
BCXE - CBOE EUROPE	11.89 %	14.25 %	20.65 %	76.90 %	0.00 %
XOSL - OSLO BORS ASA	9.96 %	11.71 %	42.61%	57.39 %	0.00 %
DASI - DANSKE BANK A/S - SYSTEMATIC INTERNA	7.14 %	3.21 %	0.00 %	99.99 %	0.10 %

**Table II – Professional clients**

Class of Instrument	Tick size liquidity bands 3 and 4 (from 80 to 1999 trades per day)				
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Top five execution venues ranked in terms of trading volumes (in descending order)					
XSTO - NASDAQ STOCKHOLM AB	42.64 %	44.78 %	43.85 %	12.41 %	8.80 %
XCSE - NASDAQ COPENHAGEN A/S	31.30 %	25.66 %	43.42 %	16.64 %	0.12 %
BCXE - CBOE EUROPE EQUITIES	10.69 %	15.73 %	61.01 %	38.37 %	0.00 %
XHEL - NASDAQ HELSINKI LTD	4.33 %	4.52 %	39.52 %	25.83 %	0.03 %
TRQX - TURQUOISE	4.09 %	3.80 %	76.11 %	23.86 %	0.00 %

**Table I - Retail clients**

Class of Instrument	Tick size liquidity bands 1 and 2 (from 0 to 79 trades per day)				
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Top five execution venues ranked in terms of trading volumes (in descending order)					
XCSE - NASDAQ COPENHAGEN A/S	38.20 %	32.57 %	0.62 %	0.83 %	0.55 %
XSTO - NASDAQ STOCKHOLM AB	21.99 %	24.01 %	4.50 %	4.98 %	1.94 %
XOSL - OSLO BORS ASA	15.50 %	14.52 %	40.21 %	59.78 %	0.06 %
XHEL - NASDAQ HELSINKI LTD	13.72 %	17.23 %	0.27 %	0.85 %	0.00 %
BCXE - CBOE EUROPE EQUITIES	5.19 %	6.06 %	8.84 %	89.26 %	0.00 %

**Table II - Professional clients**

Class of Instrument	Tick size liquidity bands 1 and 2 (from 0 to 79 trades per day)				
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Top five execution venues ranked in terms of trading volumes (in descending order)					
XSTO - NASDAQ STOCKHOLM AB	56.29 %	67.05 %	37.45 %	12.61 %	18.29 %
XCSE - NASDAQ COPENHAGEN A/S	15.55 %	8.93 %	25.61 %	17.40 %	3.65 %
XHEL - NASDAQ HELSINKI LTD	12.62 %	6.48 %	8.40 %	11.04 %	1.97 %
BCXE - CBOE EUROPE EQUITIES	6.66 %	9.39 %	61.24 %	38.07 %	0.00 %
XOSL - OSLO BORS ASA	4.49 %	4.02 %	44.75 %	55.08 %	9.09 %

## Top five brokers

**Table I – Retail clients**

Class of Instrument	Tick size liquidity bands 5 and 6 (from 2000 trades per day)		
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of directed orders
Top five execution brokers ranked in terms of trading volumes (in descending order)			
549300HN4UKV1E2R3U73 - BOFA SECURITIES, INC.	45.11 %	55.70 %	0.00 %
549300FHOWJAPEHTIQ77 - BOFA SECURITIES EUROPE SA	20.94 %	23.92 %	0.00 %
4PQUHN3JPF GFNF3BB653 - MORGAN STANLEY & CO. INTERNATIONAL PLC	8.51 %	3.90 %	0.00 %
7LTWFZYICNSX8D621K86 - DEUTSCHE BANK AKTIENGESELLSCHAFT	5.81 %	5.95 %	0.00 %
213800EEC95PRUCEUP63 - VIRTU ITG EUROPE LIMITED	4.73 %	4.44 %	0.00 %

**Table II – Professional clients**

Class of Instrument	Tick size liquidity bands 5 and 6 (from 2000 trades per day)		
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of directed orders
Top five execution brokers ranked in terms of trading volumes (in descending order)			
4PQUHN3JPF GFNF3BB653 - MORGAN STANLEY & CO. INTERNATIONAL PLC	18.82 %	41.39 %	0.00 %
5299007QVIQ7I064NX37 - UBS EUROPE	16.67 %	2.72 %	0.00 %
549300FHOWJAPEHTIQ77 - BOFA SECURITIES EUROPE SA	9.93 %	2.76 %	0.00 %
XKZZ2JZF41MRHTR1V493 - CITIGROUP GLOBAL MARKETS LIMITED	8.16 %	6.89 %	0.00 %
549300W30847BJ1LD502 - SANFORD C. BERNSTEIN IRELAND LIMITED	7.77 %	2.51 %	0.00 %

**Table I – Retail clients**

Class of Instrument	Tick size liquidity bands 3 and 4 (from 80 to 1999 trades per day)		
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of directed orders
Top five execution brokers ranked in terms of trading volumes (in descending order)			
549300HN4UKV1E2R3U73 - BOFA SECURITIES, INC.	51.84%	56.93%	0.00%
549300FHOWJAPEHTIQ77 - BOFA SECURITIES EUROPE SA	15.35%	14.10%	0.00%
213800EEC95PRUCEUP63 - VIRTU ITG EUROPE LIMITED	12.43%	10.95%	0.00%
4PQUHN3JPFQFN3BB653 - MORGAN STANLEY & CO. INTERNATIONAL PLC	5.84%	2.84%	0.00%
7LWTFZYICNSX8D621K86 - DEUTSCHE BANK AKTIENGESELLSCHAFT	5.12%	3.74%	0.00%

**Table II – Professional clients**

Class of Instrument	Tick size liquidity bands 3 and 4 (from 80 to 1999 trades per day)		
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of directed orders
Top five execution brokers ranked in terms of trading volumes (in descending order)			
213800EEC95PRUCEUP63 - VIRTU ITG EUROPE LIMITED	13.18 %	44.96 %	0.00 %
4PQUHN3JPFQFN3BB653 - MORGAN STANLEY & CO. INTERNATIONAL PLC	10.78 %	21.37 %	0.00 %
5299007QVIQ7I064NX37 - UBS EUROPE	8.78 %	2.95 %	0.00 %
549300FHOWJAPEHTIQ77 - BOFA SECURITIES EUROPE SA	7.22 %	2.17 %	0.00 %
549300W30847BJ1LD502 - SANFORD C. BERNSTEIN IRELAND LIMITED	6.91 %	1.66 %	0.00 %



**Table I – Retail clients**

Class of Instrument	Tick size liquidity bands 1 and 2 (from 0 to 79 trades per day)		
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of directed orders
Top five execution brokers ranked in terms of trading volumes (in descending order)			
549300HN4UKV1E2R3U73 - BOFA SECURITIES INC	72.97 %	81.38 %	0.00 %
XKZZ2JZF41MRHTR1V493 - CITIGROUP GLOBAL MARKETS LIMITED	8.08 %	5.30 %	0.00 %
4PQUHN3JPFQFN3BB653 - MORGAN STANLEY & CO. INTERNATIONAL PLC	5.85 %	3.79 %	0.00 %
549300772UJAHRD6L053 - ROBERT W. BAIRD & CO. INCORPORATED	3.49 %	5.45 %	0.00 %
5299007QVIQ7I064NX37 - UBS EUROPE	2.61 %	0.01 %	0.00 %

**Table II – Professional clients**

Class of Instrument	Tick size liquidity bands 1 and 2 (from 0 to 79 trades per day)		
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of directed orders
Top five execution brokers ranked in terms of trading volumes (in descending order)			
5299007QVIQ7I064NX37 - UBS EUROPE	18.42 %	6.98 %	0.00 %
XKZZ2JZF41MRHTR1V493 - CITIGROUP GLOBAL MARKETS LIMITED	17.02 %	14.49 %	0.00 %
213800VZMAGVIU2IJA72 - CREDIT LYONNAIS	14.13 %	10.05 %	0.00 %
549300W30847BJ1LD502 - SANFORD C. BERNSTEIN IRELAND LIMITED	10.62 %	8.16 %	0.00 %
4PQUHN3JPFQFN3BB653 - MORGAN STANLEY & CO. INTERNATIONAL PLC	8.62 %	24.98 %	0.00 %

## *RTS 28 Summary Analysis - Debt instruments*

- Bonds
- Money markets instruments

### **Explanation of the relative importance we 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;**

When you place an order with us in debt instruments, and for our portfolio management services when we take decision to deal on your behalf, we may execute the order on an execution venue (including being an execution venue ourselves) or by sending the order to an external broker for execution.

When we assess the quality of execution for debt instruments, the main execution factor we consider is execution price.

Secondary execution factors we take into account when assessing the quality of execution are costs, speed, likelihood of execution, type & size of the order, and settlement.

In the assessment and selection of execution venues and brokers where we believe we can consistently obtain best execution in debt instruments for our clients, we consider qualitative factors, such as market access, market share, liquidity, market knowledge & product specialization, reliable quoting, market price transparency, order handling process, ratings and trading costs.

To ensure that we are consistently able to deliver best execution to our clients, we monitor on an ongoing basis the quality of execution obtained from the execution venues and brokers used to execute client orders in debt instruments. Our monitoring consists both of trade by trade monitoring and overall trend monitoring of the performance of the execution factors.

For a detailed description of how we carry out client orders, application of execution factors and how we prioritise the factors, please refer to our Order Execution Policy.

### **Description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders;**

Danske Bank A/S does not have any close links, conflicts of interests, or common ownerships with respect to any external execution venues or brokers used to execute client orders in debt instruments.

Any dealing or relationship between units within Danske Bank A/S is conducted in accordance with Danske Bank A/S's Conflict of Interest Policy. For further information please see our Order Execution Policy including the Portfolio Management Addendum.

### **Description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received;**

Danske Bank A/S does not have any specific arrangements with any external execution venues or brokers used to execute client orders in debt instruments regarding payments made or received, discounts, rebates or non-monetary benefits received.

Any dealing or relationship between units within Danske Bank A/S is conducted in accordance with Danske Bank A/S's Conflict of Interest Policy. For further information please see our Order Execution Policy including the Portfolio Management Addendum.

### **Explanation of the factors that led to a change in the list of execution venues listed in our execution policy, if such a change occurred;**

Since publication of our previous RTS 28 Summary Analysis for 2019, we have made changes in the list of execution venues and brokers listed in our Order Execution Policy used for execution of debt instruments. The factors that led to a change in the list of execution venues and brokers correspond to the main execution factors and qualitative factors stated above, which we use in the assessment and selection of execution venues and brokers.

**Explanation of how our order execution differs according to client categorisation, where we treat categories of clients differently and where it may affect our order execution arrangements;**

In general, we treat categories of clients in scope of best execution equally in terms of order execution.

For retail clients, the best possible result will be determined in terms of the total consideration. Total consideration means the price of the financial instrument together with the costs related to execution, including all expenses incurred by the client that are directly related to the execution of the order.

For professional clients, the best possible result will usually be determined by price and cost, but may be dependent on other execution factors, such as size and type, specific to the order given.

For a detailed description of how we carry out client orders in debt instruments, please refer to our Order Execution Policy.

**Explanation of whether we have given other criteria 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;**

For retail clients, the best possible result will always be determined in terms of the total consideration, being the price of the financial instrument together with the costs related to execution, including all expenses incurred by the client that are directly related to the execution of the order.

However, if you as a retail client provide us with instructions regarding an order or any aspect of an order, we will execute the order in accordance with such instructions to the extent reasonably possible, which may prevent us from taking the steps to execute at the best prices and/or costs.

**Explanation of how we have used any data or tools relating to the quality of execution, including any data published under Commission Delegated Regulation (EU) 2017/575 of 8 June 2016 [RTS 27];**

We monitor the quality of execution provided by the execution venues and brokers used to execute client orders in debt instruments on a consistent basis, using automatic monitoring tools. In such monitoring we always strive to use external and independent market data against which to compare our execution quality, e.g. the use of order and quote data from third party venues and brokers to assess our execution prices. If no observable market price is available for a specific instrument, we check the fairness of the price by using relevant market data and, where possible, by making a comparison with similar or comparable products.

Our monitoring also includes exception-based controls, with results reviewed by a specialist team together with front office staff.

For information on our best execution monitoring, please refer to our Order Execution Policy.

Under MiFID II Art. 27(3) and Commission Delegated Regulation (EU) 2017/575 (RTS 27), execution venues are required to publish a range of information on execution quality on a quarterly basis. Being an execution venue ourselves for execution of debt instruments, we publish information on execution quality on a quarterly basis. The information on execution quality can be found on our website: <https://danskebank.com/bestexecution>

**Where applicable, an explanation of how we have used output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU;**

Currently not applicable as no such data have yet been published in accordance with Article 65 of Directive 2014/65/EU (MiFID II Directive).

**Summary of the analysis and conclusions drawn from our monitoring of debt instruments;**

We believe that the analysis and conclusions drawn from our monitoring of the quality of execution confirm that the execution venues and brokers used to execute client orders in debt instruments meet our standards in delivering best execution to our clients on a consistent basis.

A list of our top five execution venues and brokers used to execute retail and professional client orders can be found below together with detailed information on the volume and number of orders executed by each execution venue and broker. A list of all major execution venues and brokers used to execute client orders in debt instruments can be found on our website: <https://danskebank.com/bestexecution>

## Top five venues and brokers – Debt instruments

### Top five venues

**Table I – Retail clients**

Class of Instrument	Bonds				
	Top five execution venues ranked in terms of trading volumes (in descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders <sup>4</sup>	Percentage of aggressive orders <sup>5</sup>
DASI - DANSKE BANK A/S - SYSTEMATIC	54.59 %	84.28 %	0.00 %	99.98 %	0.00 %
BMTF - BLOOMBERG TRADING FACILITY LIMITED	43.62 %	9.70 %	0.00 %	100.00 %	0.00 %
XCSE - NASDAQ COPENHAGEN A/S	1.33 %	4.45 %	0.00 %	0.00 %	0.00 %
XSTO - NASDAQ STOCKHOLM AB	0.39 %	1.29 %	0.00 %	0.00 %	0.00 %
XOSL - OSLO BORS ASA	0.06 %	0.25 %	0.00 %	0.00 %	0.00 %

**Table II – Professional clients**

Class of Instrument	Bonds				
	Top five execution venues ranked in terms of trading volumes (in descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders
DASI - DANSKE BANK A/S - SYSTEMATIC	58.53 %	34.62 %	0.00 %	100.00 %	0.00 %
BMTF - BLOOMBERG TRADING FACILITY LIMITED	37.59 %	51.43 %	0.00 %	100.00 %	0.00 %
TREU - TRADEWEB EUROPE LIMITED	3.07 %	1.01 %	0.00 %	100.00 %	0.00 %
MAEL - MARKETAXESS EUROPE LIMITED	0.82 %	12.92 %	0.00 %	100.00 %	0.00 %
XCSE - NASDAQ COPENHAGEN A/S	0.00 %	0.01 %	0.00 %	0.00 %	0.00 %

<sup>4</sup> Orders entered into the order book that provided liquidity

<sup>5</sup> Orders entered into the order book that took liquidity – where Danske Bank A/S is the execution venue, all orders are defined as taking liquidity

<sup>6</sup> Orders where a specific execution venue was specified by the client prior to execution of the order

**Table I - Retail clients**

Class of Instrument	Money market instruments				
Top five execution venues ranked in terms of trading volumes (in descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
BMTF - BLOOMBERG TRADING FACILITY LIMITED	89.00 %	36.36 %	0.00 %	100.00 %	0.00 %
DASI - DANSKE BANK A/S - SYSTEMATIC	11.00 %	63.64 %	0.00 %	100.00 %	0.00 %

**Table II - Professional clients**

Class of Instrument	Money market instruments				
Top five execution venues ranked in terms of trading volumes (in descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
DASI - DANSKE BANK A/S - SYSTEMATIC	89.37 %	78.28 %	0.00 %	100.00 %	0.00 %
BMTF - BLOOMBERG TRADING FACILITY LIMITED	9.49 %	12.84 %	0.00 %	100.00 %	0.00 %
TREU - TRADEWEB EUROPE LIMITED	1.02 %	0.87 %	0.00 %	100.00 %	0.00 %
MAEL - MARKETAXESS EUROPE LIMITED	0.12 %	8.01 %	0.00 %	100.00 %	0.00 %

## Top five brokers

**Table I – Retail clients**

Class of Instrument	Bonds		
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of directed orders
Top five execution brokers ranked in terms of trading volumes (in descending order)			
5299000DI3047E2LIV03 - NORDEA BANK ABP	50.54 %	50.00 %	0.00 %
GP5DT10VX1QRQKVBK64 - SYDBANK	39.75 %	33.33 %	0.00 %
5299000RWD2J46DMCW33 - LIND CAPITAL FOND SMÆGLERSELSKAB A/S	9.70 %	16.67 %	0.00 %

**Table II – Professional clients**

Class of Instrument	Bonds		
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of directed orders
Top five execution brokers ranked in terms of trading volumes (in descending order)			
F3JS33DEI6XQ4ZBPTN86 - SKANDINAVISKA ENSKILDA BANKEN AB	13.75 %	12.56 %	0.00 %
5299000DI3047E2LIV03 - NORDEA BANK ABP	13.36 %	12.49 %	0.00 %
549300FHOWJAPEHTIQ77 - BOFA SECURITIES EUROPE SA	8.33 %	5.45 %	0.00 %
M312WZV08Y7LYUC71685 - SWEDBANK AB	7.07 %	8.69 %	0.00 %
ROMUWSFPU8MPRO8K5P83 - BNP PARIBAS	5.73 %	3.69 %	0.00 %

**Table I – Retail clients**

Class of Instrument	Money market instruments		
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of directed orders
Top five execution brokers ranked in terms of trading volumes (in descending order)			

**Table II – Professional clients**

Class of Instrument	Money market instruments		
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of directed orders
Top five execution brokers ranked in terms of trading volumes (in descending order)			
02RNE8IBXP4R0TD8PU41 - SOCIETE GENERALE, LONDON BRANCH	24.74 %	3.54 %	0.00 %
M312WZV08Y7LYUC71685 - SWEDBANK AB	17.12 %	39.62 %	0.00 %
5299000DI3047E2LIV03 - NORDEA BANK ABP	14.68 %	22.64 %	0.00 %
ROMUWSFPU8MPRO8K5P83 - BNP PARIBAS	9.25 %	1.42 %	0.00 %
2G5BKIC2CB69PRJH1W31 - BARCLAYS BANK IRELAND	6.49 %	1.18 %	0.00 %

## *RTS 28 Summary Analysis - Interest rates derivatives*

- Futures and options admitted to trading on a trading venue
- Swaps, forwards, and other interest rates derivatives

### **Explanation of the relative importance we 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;**

When you place an order with us in interest rates derivatives, and for our portfolio management services when we take decision to deal on your behalf, we may execute the order on an execution venue (including being an execution venue ourselves) or by sending the order to an external broker for execution.

When we assess the quality of execution for interest rates derivatives, the main execution factors we consider are execution price and costs.

Secondary execution factors we take into account when assessing the quality of execution are speed, likelihood of execution, type & size of the order, and settlement.

In the assessment and selection of execution venues and brokers where we believe we can consistently obtain best execution in interest rates derivatives for our clients, we consider qualitative factors, such as market access, market share, market liquidity, market knowledge & product specialization, reliable quoting, observable price spreads and yields, order handling process and trading costs.

To ensure that we are consistently able to deliver best execution to our clients, we monitor on an ongoing basis the quality of execution obtained from the execution venues and brokers used to execute client orders in interest rates derivatives. Our monitoring consist both of trade by trade monitoring and overall trend monitoring of the performance of the execution factors.

For a detailed description of how we carry out client orders, application of execution factors and how we prioritise the factors, please refer to our Order Execution Policy.

### **Description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders;**

Danske Bank A/S does not have any close links, conflicts of interests, or common ownerships with respect to any external execution venues or brokers used to execute client orders in interest rates derivatives.

Any dealing or relationship between units within Danske Bank A/S is conducted in accordance with Danske Bank A/S's Conflict of Interest Policy. For further information please see our Order Execution Policy including the Portfolio Management Addendum.

### **Description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received;**

Danske Bank A/S does not have any specific arrangements with any external execution venues or brokers used to execute client orders in interest rates derivatives regarding payments made or received, discounts, rebates or non-monetary benefits received.

Any dealing or relationship between units within Danske Bank A/S is conducted in accordance with Danske Bank A/S's Conflict of Interest Policy. For further information please see our Order Execution Policy including the Portfolio Management Addendum.

### **Explanation of the factors that led to a change in the list of execution venues listed in our execution policy, if such a change occurred;**

Since publication of our previous RTS 28 Summary Analysis for 2019, we have made changes in the list of execution venues and brokers listed in our Order Execution Policy used for execution of interest rates derivatives. The factors that led to a change in the list of execution venues and brokers correspond to the main execution factors and qualitative factors stated above, which we use in the assessment and selection of execution venues and brokers.



**Explanation of how our order execution differs according to client categorisation, where we treat categories of clients differently and where it may affect our order execution arrangements;**

In general, we treat categories of clients in scope of best execution equally in terms of order execution.

For retail clients, the best possible result will be determined in terms of the total consideration. Total consideration means the price of the financial instrument together with the costs related to execution, including all expenses incurred by the client that are directly related to the execution of the order.

For professional clients, the best possible result will usually be determined by price and cost, but may be dependent on other execution factors, such as size and type, specific to the order given.

For a detailed description of how we carry out client orders in interest rates derivatives, please refer to our Order Execution Policy.

**Explanation of whether we have given other criteria 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;**

For retail clients, the best possible result will always be determined in terms of the total consideration, being the price of the financial instrument together with the costs related to execution, including all expenses incurred by the client that are directly related to the execution of the order.

However, if you as a retail client provide us with instructions regarding an order or any aspect of an order, we will execute the order in accordance with such instructions to the extent reasonably possible, which may prevent us from taking the steps to execute at the best prices and/or costs.

**Explanation of how we have used any data or tools relating to the quality of execution, including any data published under Commission Delegated Regulation (EU) 2017/575 of 8 June 2016 [RTS 27];**

We monitor the quality of execution provided by the execution venues and brokers used to execute client orders in interest rates derivatives on a consistent basis, using automatic monitoring tools. In such monitoring, we always strive to use external and independent market data against which to compare our execution quality, e.g. the use of order and quote data from third party venues and brokers to assess our execution prices. If no observable market price is available for a specific instrument, we check the fairness of the price by using relevant market data and, where possible, by making a comparison with similar or comparable products.

Our monitoring also includes exception-based controls, with results reviewed by a specialist team together with front office staff.

For information on our best execution monitoring, please refer to our Order Execution Policy.

Under MiFID II Art. 27(3) and Commission Delegated Regulation (EU) 2017/575 (RTS 27), execution venues are required to publish a range of information on execution quality on a quarterly basis. Being an execution venue ourselves for execution of interest rates derivatives, we publish information on execution quality on a quarterly basis. The information on execution quality can be found on our website: <https://danskebank.com/bestexecution>

**Where applicable, an explanation of how we have used output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU;**

Currently not applicable as no such data have yet been published in accordance with Article 65 of Directive 2014/65/EU (MiFID II Directive).

**Summary of the analysis and conclusions drawn from our monitoring of interest rates derivatives;**

We believe that the analysis and conclusions drawn from our monitoring of the quality of execution confirm that the execution venues and brokers used to execute client orders in interest rates derivatives meet our standards in delivering best execution to our clients on a consistent basis.

A list of our top five execution venues and brokers used to execute retail and professional client orders can be found below together with detailed information on the volume and number of orders executed by each execution venue and broker. A list of all major execution venues and brokers used to execute client orders in interest rates derivatives can be found on our website: <https://danskebank.com/best-execution>

## *Top five venues and brokers – Interest rates derivatives*

### Top five venues<sup>7</sup>

**Table I – Retail clients**

Class of Instrument	Futures and options admitted to trading on a trading venue				
Top five execution venues ranked in terms of trading volumes (in descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders <sup>8</sup>	Percentage of aggressive orders <sup>9</sup>	Percentage of directed orders <sup>10</sup>

**Table II – Professional clients**

Class of Instrument	Futures and options admitted to trading on a trading venue				
Top five execution venues ranked in terms of trading volumes (in descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

<sup>7</sup> Data for Interest rate derivatives – futures and options admitted to trading on a trading venue have been delayed and will be published at a later date.

<sup>8</sup> Orders entered into the order book that provided liquidity

<sup>9</sup> Orders entered into the order book that took liquidity – where Danske Bank A/S is the execution venue, all orders are defined as taking liquidity

<sup>10</sup> Orders where a specific execution venue was specified by the client prior to execution of the order

**Table I – Retail clients**

Class of Instrument	Swaps, forwards, and other interest rates derivatives				
Top five execution venues ranked in terms of trading volumes (in descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
DASI - DANSKE BANK A/S – SYSTEMATIC INTERNA	100.00 %	100.00 %	0.00 %	100.00 %	0.00 %

**Table II – Professional clients**

Class of Instrument	Swaps, forwards, and other interest rates derivatives				
Top five execution venues ranked in terms of trading volumes (in descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
DASI - DANSKE BANK A/S – SYSTEMATIC INTERNA	100.00 %	100.00 %	0.00 %	100.00 %	0.00 %

## Top five brokers<sup>11</sup>

**Table I – Retail clients**

Class of Instrument	Futures and options admitted to trading on a trading venue		
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of directed orders
Top five execution brokers ranked in terms of trading volumes (in descending order)			

**Table II – Professional clients**

Class of Instrument	Futures and options admitted to trading on a trading venue		
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of directed orders
Top five execution brokers ranked in terms of trading volumes (in descending order)			

<sup>11</sup> Data for Interest rate derivatives - futures and options admitted to trading on a trading venue have been delayed and will be published at a later date.

**Table I – Retail clients**

Class of Instrument	Swaps, forwards, and other interest rates derivatives		
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of directed orders
Top five execution brokers ranked in terms of trading volumes (in descending order)			

**Table II – Professional clients**

Class of Instrument	Swaps, forwards, and other interest rates derivatives		
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of directed orders
Top five execution brokers ranked in terms of trading volumes (in descending order)			
5299000DI3047E2LIV03 - NORDEA BANK ABP	28.77 %	14.97 %	0.00 %
549300FHOWJAPEHTIQ77 - BOFA SECURITIES EUROPE SA	16.93 %	19.63 %	0.00 %
K6Q0W1PS1L104IQL9C32 - JPMORGAN CHASE & CO	13.60 %	6.07 %	0.00 %
DGQCSV2PHVF7I2743539 - NOMURA INTERNATIONAL PLC	10.51 %	10.52 %	0.00 %
ROMUWSFPU8MPRO8K5P83 - BNP PARIBAS	6.50 %	10.95 %	0.00 %

## *RTS 28 Summary Analysis - Currency derivatives*

- Futures and options admitted to trading on a trading venue
- Swaps, forwards, and other currency derivatives

**Explanation of the relative importance we 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;**

When you place an order with us in currency derivatives, and for our portfolio management services when we take decision to deal on your behalf, we may execute the order on an execution venue (including being an execution venue ourselves) or by sending the order to an external broker for execution.

When we assess the quality of execution for currency derivatives, the main execution factor we consider is execution price.

Secondary execution factors we take into account when assessing the quality of execution are costs, speed, likelihood of execution, type & size of the order, and settlement.

In the assessment and selection of execution venues and brokers where we believe we can consistently obtain best execution in currency derivatives for our clients, we consider qualitative factors, such as market access, market share, market liquidity, market knowledge & product specialization, reliable quoting, observable prices / spot rates, order handling process and trading costs.

To ensure that we are consistently able to deliver best execution to our clients, we monitor on an ongoing basis the quality of execution obtained from the execution venues and brokers used to execute client orders in currency derivatives. Our monitoring consists both of trade by trade monitoring and overall trend monitoring of the performance of the execution factors.

For a detailed description of how we carry out client orders, application of execution factors and how we prioritise the factors, please refer to our Order Execution Policy.

**Description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders;**

Danske Bank A/S does not have any close links, conflicts of interests, or common ownerships with respect to any external execution venues or brokers used to execute client orders in currency derivatives.

Any dealing or relationship between units within Danske Bank A/S is conducted in accordance with Danske Bank A/S's Conflict of Interest Policy. For further information please see our Order Execution Policy including the Portfolio Management Addendum.

**Description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received;**

Danske Bank A/S does not have any specific arrangements with any external execution venues or brokers used to execute client orders in currency derivatives regarding payments made or received, discounts, rebates or non-monetary benefits received.

Any dealing or relationship between units within Danske Bank A/S is conducted in accordance with Danske Bank A/S's Conflict of Interest Policy. For further information please see our Order Execution Policy including the Portfolio Management Addendum.

**Explanation of the factors that led to a change in the list of execution venues listed in our execution policy, if such a change occurred;**

Since publication of our previous RTS 28 Summary Analysis for 2019, we have made no such changes in the list of execution venues and brokers listed in our Order Execution Policy used for execution of currency derivatives.

**Explanation of how our order execution differs according to client categorisation, where we treat categories of clients differently and where it may affect our order execution arrangements;**

In general, we treat categories of clients in scope of best execution equally in terms of order execution.

For retail clients, the best possible result will be determined in terms of the total consideration. Total consideration means the price of the financial instrument together with the costs related to execution, including all expenses incurred by the client that are directly related to the execution of the order.

For professional clients, the best possible result will usually be determined by price and cost, but may be dependent on other execution factors, such as size and type, specific to the order given.

For a detailed description of how we carry out client orders in currency derivatives, please refer to our Order Execution Policy.

**Explanation of whether we have given other criteria 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;**

For retail clients, the best possible result will always be determined in terms of the total consideration, being the price of the financial instrument together with the costs related to execution, including all expenses incurred by the client that are directly related to the execution of the order.

However, if you as a retail client provide us with instructions regarding an order or any aspect of an order, we will execute the order in accordance with such instructions to the extent reasonably possible, which may prevent us from taking the steps to execute at the best prices and/or costs.

**Explanation of how we have used any data or tools relating to the quality of execution, including any data published under Commission Delegated Regulation (EU) 2017/575 of 8 June 2016 [RTS 27];**

We monitor the quality of execution provided by the execution venues and brokers used to execute client orders in currency derivatives on a consistent basis, using automatic monitoring tools. In such monitoring we always strive to use external and independent market data against which to compare our execution quality, e.g. the use of order and quote data from third party venues and brokers to assess our execution prices. If no observable market price is available for a specific instrument, we check the fairness of the price by using relevant market data and, where possible, by making a comparison with similar or comparable products.

Our monitoring also includes exception-based controls, with results reviewed by a specialist team together with front office staff.

For information on our best execution monitoring, please refer to our Order Execution Policy.

Under MiFID II Art. 27(3) and Commission Delegated Regulation (EU) 2017/575 (RTS 27), execution venues are required to publish a range of information on execution quality on a quarterly basis. Being an execution venue ourselves for execution of currency derivatives, we publish information on execution quality on a quarterly basis. The information on execution quality can be found on our website: <https://danskebank.com/bestexecution>

**Where applicable, an explanation of how we have used output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU;**

Currently not applicable as no such data have yet been published in accordance with Article 65 of Directive 2014/65/EU (MiFID II Directive).

**Summary of the analysis and conclusions drawn from our monitoring of currency derivatives;**

We believe that the analysis and conclusions drawn from our monitoring of the quality of execution confirm that the execution venues and brokers used to execute client orders in currency derivatives meet our standards in delivering best execution to our clients on a consistent basis.

A list of our top five execution venues and brokers used to execute retail and professional client orders can be found below together with detailed information on the volume and number of orders executed by each execution venue and broker. A list of all major execution venues and brokers used to execute client orders in currency derivatives can be found on our website: <https://danskebank.com/bestexecution>

## Top five venues and brokers – Currency derivatives

### Top five venues

**Table I – Retail clients**

Class of Instrument	Futures and options admitted to trading on a trading venue				
Top five execution venues ranked in terms of trading volumes (in descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders <sup>12</sup>	Percentage of aggressive orders <sup>13</sup>	Percentage of directed orders <sup>14</sup>

**Table II – Professional clients**

Class of Instrument	Futures and options admitted to trading on a trading venue				
Top five execution venues ranked in terms of trading volumes (in descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

<sup>12</sup> Orders entered into the order book that provided liquidity

<sup>13</sup> Orders entered into the order book that took liquidity – where Danske Bank A/S is the execution venue, all orders are defined as taking liquidity

<sup>14</sup> Orders where a specific execution venue was specified by the client prior to execution of the order



**Table I – Retail clients**

Class of Instrument	Swaps, forwards, and other currency derivatives				
Top five execution venues ranked in terms of trading volumes (in descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
DASI - DANSKE BANK A/S – SYSTEMATIC INTERNA	100.00 %	100.00 %	0.00 %	100.00 %	0.00 %

**Table II – Professional clients**

Class of Instrument	Swaps, forwards, and other currency derivatives				
Top five execution venues ranked in terms of trading volumes (in descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
FXRQ - FXALL RFQ	100.00 %	100.00 %	0.00 %	100.00 %	0.00 %

## Top five brokers

**Table I – Retail clients**

Class of Instrument	Futures and options admitted to trading on a trading venue		
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of directed orders
Top five execution brokers ranked in terms of trading volumes (in descending order)			

**Table II – Professional clients**

Class of Instrument	Futures and options admitted to trading on a trading venue		
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of directed orders
Top five execution brokers ranked in terms of trading volumes (in descending order)			

**Table I – Retail clients**

Class of Instrument	Swaps, forwards, and other currency derivatives		
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of directed orders
Top five execution brokers ranked in terms of trading volumes (in descending order)			

**Table II – Professional clients**

Class of Instrument	Swaps, forwards, and other currency derivatives		
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of directed orders
Top five execution brokers ranked in terms of trading volumes (in descending order)			
DGQCSV2PHVF7I2743539 - NOMURA INTERNATIONAL PLC	46.48 %	16.15 %	0.00 %
F3JS33DEI6XQ4ZBPTN86 - SKANDINAVISKA ENSKILDA BANKEN AB	23.87 %	4.97 %	0.00 %
OW2PZJM8XOY22M4GG883 - DEKA BANK DEUTSCHE GIROZENTRALE	8.97 %	37.06 %	0.00 %
ROMUWSFPU8MPRO8K5P83 - BNP PARIBAS	8.23 %	2.90 %	0.00 %
5493006KMX1VFTYPW14 - BROWN BROTHERS HARRIMAN & CO	7.67 %	24.02 %	0.00 %

## *RTS 28 Summary Analysis - Structured finance instruments*

### **Explanation of the relative importance we 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;**

When you place an order with us in structured finance instruments, and for our portfolio management services when we take decision to deal on your behalf, we may execute the order on an execution venue (including being an execution venue ourselves) or by sending the order to an external broker for execution.

When we assess the quality of execution for structured finance instruments, the main execution factor we consider is execution price.

Secondary execution factors we take into account when assessing the quality of execution are costs, speed, likelihood of execution, type & size of the order, and settlement.

In the assessment and selection of execution venues and brokers where we believe we consistently can obtain best execution in structured finance instruments for our clients, we consider qualitative factors, such as market access, market share, market liquidity, market knowledge & product specialization, reliable quoting, observable price spreads and yields, order handling process and trading costs.

To ensure that we are consistently able to deliver best execution to our clients, we monitor on an ongoing basis the quality of execution obtained from the execution venues and brokers used to execute client orders in structured finance instruments. Our monitoring consist both of trade by trade monitoring and overall trend monitoring of the performance of the execution factors.

For a detailed description of how we carry out client orders, application of execution factors and how we prioritise the factors, please refer to our Order Execution Policy.

### **Description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders;**

Danske Bank A/S does not have any close links, conflicts of interests, or common ownerships with respect to any external execution venues or brokers used to execute client orders in structured finance instruments.

Any dealing or relationship between units within Danske Bank A/S is conducted in accordance with Danske Bank A/S's Conflict of Interest Policy. For further information please see our Order Execution Policy including the Portfolio Management Addendum.

### **Description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received;**

Danske Bank A/S does not have any specific arrangements with any external execution venues or brokers used to execute client orders in structured finance instruments regarding payments made or received, discounts, rebates or non-monetary benefits received.

Any dealing or relationship between units within Danske Bank A/S is conducted in accordance with Danske Bank A/S's Conflict of Interest Policy. For further information please see our Order Execution Policy including the Portfolio Management Addendum.

### **Explanation of the factors that led to a change in the list of execution venues listed in our execution policy, if such a change occurred;**

Since publication of our previous RTS 28 Summary Analysis for 2019, we have made changes in the list of execution venues and brokers listed in our Order Execution Policy used for execution of structured finance instruments. The factors that led to a change in the list of execution venues and brokers correspond to the main execution factors and qualitative factors stated above, which we use in the assessment and selection of execution venues and brokers.

### **Explanation of how our order execution differs according to client categorisation, where we treat categories of clients differently and where it may affect our order execution arrangements;**

In general we treat categories of clients in scope of best execution equally in terms of order execution.

For retail clients, the best possible result will be determined in terms of the total consideration. Total consideration means the price of the financial instrument together with the costs related to execution, including all expenses incurred by the client that are directly related to the execution of the order.

For professional clients, the best possible result will usually be determined by price and cost, but may be dependent on other execution factors, such as size and type, specific to the order given.

For a detailed description of how we carry out client orders in structured finance instruments, please refer to our Order Execution Policy.

**Explanation of whether we have given other criteria 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;**

For retail clients, the best possible result will always be determined in terms of the total consideration, being the price of the financial instrument together with the costs related to execution, including all expenses incurred by the client that are directly related to the execution of the order.

However, if you as a retail client provide us with instructions regarding an order or any aspect of an order, we will execute the order in accordance with such instructions to the extent reasonably possible, which may prevent us from taking the steps to execute at the best prices and/or costs.

**Explanation of how we have used any data or tools relating to the quality of execution, including any data published under Commission Delegated Regulation (EU) 2017/575 of 8 June 2016 [RTS 27];**

We monitor the quality of execution provided by the execution venues and brokers used to execute client orders in structured finance instruments on a consistent basis, using automatic monitoring tools. In such monitoring we always strive to use external and independent market data against which to compare our execution quality, e.g. the use of order and quote data from third party venues and brokers to assess our execution prices. If no observable market price is available for a specific instrument, we check the fairness of the price by using relevant market data and, where possible, by making a comparison with similar or comparable products.

Our monitoring also includes exception-based controls, with results reviewed by a specialist team together with front office staff.

For information on our best execution monitoring, please refer to our Order Execution Policy.

Under MiFID II Art. 27(3) and Commission Delegated Regulation (EU) 2017/575 (RTS 27), execution venues are required to publish a range of information on execution quality on a quarterly basis. Being an execution venue ourselves for execution of structured finance instruments, we publish information on execution quality on a quarterly basis. The information on execution quality can be found on our website: <https://danskebank.com/bestexecution>

**Where applicable, an explanation of how we have used output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU;**

Currently not applicable as no such data have yet been published in accordance with Article 65 of Directive 2014/65/EU (MiFID II Directive).

**Summary of the analysis and conclusions drawn from our monitoring of structured finance instruments;**

We believe that the analysis and conclusions drawn from our monitoring of the quality of execution confirm that the execution venues and brokers used to execute client orders in structured finance instruments meet our standards in delivering best execution to our clients on a consistent basis.

A list of our top five execution venues and brokers used to execute retail and professional client orders can be found below together with detailed information on the volume and number of orders executed by each execution venue and broker. A list of all major execution venues and brokers used to execute client orders in structured finance instruments can be found on our website: <https://danskebank.com/bestexecution>

## Top five venues and brokers – Structured finance instruments

### Top five venues

**Table I – Retail clients**

Class of Instrument	Structured finance instruments				
Top five execution venues ranked in terms of trading volumes (in descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders <sup>15</sup>	Percentage of aggressive orders <sup>16</sup>	Percentage of directed orders <sup>17</sup>
BMTF - BLOOMBERG TRADING FACILITY LIMITED	67.88 %	12.78 %	0.00 %	100.00 %	0.00 %
DASI - DANSKE BANK A/S - SYSTEMATIC	31.03 %	83.05 %	0.00 %	99.70 %	0.00 %
XCSE - NASDAQ COPENHAGEN A/S	0.77 %	3.44 %	0.00 %	0.00 %	0.00 %
XSTO - NASDAQ STOCKHOLM AB	0.31 %	0.74 %	0.00 %	0.00 %	0.00 %

**Table II – Professional clients**

Class of Instrument	Structured finance instruments				
Top five execution venues ranked in terms of trading volumes (in descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
BMTF - BLOOMBERG TRADING FACILITY LIMITED	66.77 %	73.40 %	0.00 %	100.00 %	0.00 %
DASI - DANSKE BANK A/S - SYSTEMATIC	30.83 %	14.36 %	0.00 %	100.00 %	0.00 %
MAEL - MARKETAXESS EUROPE LIMITED	2.40 %	12.23 %	0.00 %	100.00 %	0.00 %

<sup>15</sup> Orders entered into the order book that provided liquidity

<sup>16</sup> Orders entered into the order book that took liquidity – where Danske Bank A/S is the execution venue, all orders are defined as taking liquidity

<sup>17</sup> Orders where a specific execution venue was specified by the client prior to execution of the order

## Top five brokers

**Table I – Retail clients**

Class of Instrument	Structured finance instruments		
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of directed orders
Top five execution brokers ranked in terms of trading volumes (in descending order)			

**Table II – Professional clients**

Class of Instrument	Structured finance instruments		
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of directed orders
Top five execution brokers ranked in terms of trading volumes (in descending order)			
TXDSU46SXBWIGJ8G8E98 - ROYAL BANK OF CANADA	22.86 %	10.00 %	0.00 %
5299000DI3047E2LIV03 - NORDEA BANK ABP	19.50 %	15.00 %	0.00 %
R0MUWSFPU8MPR08K5P83 - BNP PARIBAS	13.12 %	10.00 %	0.00 %
F3JS33DEI6XQ4ZBPTN86 - SKANDINAVISKA ENSKILDA BANKEN AB	10.25 %	5.00 %	0.00 %
GP5DT10VX1QRQKVBK64 - SYDBANK	8.62 %	5.00 %	0.00 %

## *RTS 28 Summary Analysis - Equity Derivatives*

- Options and Futures admitted to trading on a trading venue
- Swaps and other equity derivatives

**Explanation of the relative importance we 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;**

When you place an order with us in equity derivatives, and for our portfolio management services when we take decision to deal on your behalf, we may execute your order on an execution venue (including being an execution venue ourselves) or by sending your order to an external broker for execution.

When we assess the quality of execution for equity derivatives, the main execution factors we consider are execution price and costs.

Secondary execution factors we take into account when assessing the quality of execution are speed, likelihood of execution, type & size of the order, and settlement.

In the assessment and selection of execution venues and brokers where we believe we can consistently obtain best execution in equity derivatives for our clients, we consider qualitative factors, such as market access, market share, liquidity, market knowledge & product specialization, market price transparency, order handling process, ratings and trading costs.

To ensure that we are consistently able to deliver best execution to our clients, we monitor on an ongoing basis the quality of execution obtained from the execution venues and brokers used to execute client orders in equity derivatives. Our monitoring consist both of trade by trade monitoring and overall trend monitoring of the performance of the execution factors.

For a detailed description of how we carry out client orders, application of execution factors and how we prioritise the factors, please refer to our Order Execution Policy.

**Description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders;**

Danske Bank A/S does not have any close links, conflicts of interests, or common ownerships with respect to any external execution venues or brokers used to execute client orders in equity derivatives.

Any dealing or relationship between units within Danske Bank A/S is conducted in accordance with Danske Bank A/S's Conflict of Interest Policy. For further information please see our Order Execution Policy including the Portfolio Management Addendum.

**Description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received;**

Danske Bank A/S does not have any specific arrangements with any external execution venues or brokers used to execute client orders in equity derivatives regarding payments made or received, discounts, rebates or non-monetary benefits received.

Any dealing or relationship between units within Danske Bank A/S is conducted in accordance with Danske Bank A/S's Conflict of Interest Policy. For further information please see our Order Execution Policy including the Portfolio Management Addendum.

**Explanation of the factors that led to a change in the list of execution venues listed in our execution policy, if such a change occurred;**

Since publication of our previous RTS 28 Summary Analysis for 2019, we have made changes in the list of execution venues and brokers listed in our Order Execution Policy used for execution of equity derivatives. The factors that led to a change in the list of execution venues and brokers correspond to the main execution factors and qualitative factors stated above, which we use in the assessment and selection of execution venues and brokers.



**Explanation of how our order execution differs according to client categorisation, where we treat categories of clients differently and where it may affect our order execution arrangements;**

In general, we treat categories of clients in scope of best execution equally in terms of order execution.

For retail clients, the best possible result will be determined in terms of the total consideration. Total consideration means the price of the financial instrument together with the costs related to execution, including all expenses incurred by the client that are directly related to the execution of the order.

For professional clients, the best possible result will usually be determined by price and cost, but may be dependent on other execution factors, such as size and type, specific to the order given.

For a detailed description of how we carry out client orders in equity derivatives, please refer to our Order Execution Policy.

**Explanation of whether we have given other criteria 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;**

For retail clients, the best possible result will always be determined in terms of the total consideration, being the price of the financial instrument together with the costs related to execution, including all expenses incurred by the client that are directly related to the execution of the order.

However, if you as a retail client provide us with instructions regarding an order or any aspect of an order, we will execute the order in accordance with such instructions to the extent reasonably possible, which may prevent us from taking the steps to execute at the best prices and/or costs.

**Explanation of how we have used any data or tools relating to the quality of execution, including any data published under Commission Delegated Regulation (EU) 2017/575 of 8 June 2016 [RTS 27];**

We monitor the quality of execution provided by the execution venues and brokers used to execute client orders in equity derivatives on a consistent basis, using automatic monitoring tools. In such monitoring we always strive to use external and independent market data against which to compare our execution quality, e.g. the use of order and quote data from third party venues and brokers to assess our execution prices.

Our monitoring also includes exception-based controls, with results reviewed by a specialist team together with front office staff.

For information on our best execution monitoring, please refer to our Order Execution Policy.

Under MiFID II Art. 27(3) and Commission Delegated Regulation (EU) 2017/575 (RTS 27), execution venues are required to publish a range of information on execution quality on a quarterly basis. Being an execution venue ourselves for execution of equity derivatives, we publish information on execution quality on a quarterly basis. The information on execution quality can be found on our website: <https://danskebank.com/bestexecution>

**Where applicable, an explanation of how we have used output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU;**

Currently not applicable as no such data have yet been published in accordance with Article 65 of Directive 2014/65/EU (MiFID II Directive).

**Summary of the analysis and conclusions drawn from our monitoring of equity derivatives;**

We believe that the analysis and conclusions drawn from our monitoring of the quality of execution confirm that the execution venues and brokers used to execute client orders in equity derivatives meet our standards in delivering best execution to our clients on a consistent basis.

A list of our top five execution venues and brokers used to execute retail and professional client orders can be found below together with detailed information on the volume and number of orders executed by each execution venue and broker. A list of all major execution venues and brokers used to execute client orders in equity derivatives can be found on our website: <https://danskebank.com/bestexecution>

## *Top five venues and brokers – Equity derivatives*

### Top five venues<sup>18</sup>

**Table I – Retail clients**

Class of Instrument	Options and Futures admitted to trading on a trading venue				
Top five execution venues ranked in terms of trading volumes (in descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders <sup>19</sup>	Percentage of aggressive orders <sup>20</sup>	Percentage of directed orders <sup>21</sup>

**Table II – Professional clients**

Class of Instrument	Options and Futures admitted to trading on a trading venue				
Top five execution venues ranked in terms of trading volumes (in descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

<sup>18</sup> Data for Equity derivatives – futures and options admitted to trading on a trading venue have been delayed and will be published at a later date.

<sup>19</sup> Orders entered into the order book that provided liquidity

<sup>20</sup> Orders entered into the order book that took liquidity – where Danske Bank A/S is the execution venue, all orders are defined as taking liquidity

<sup>21</sup> Orders where a specific execution venue was specified by the client prior to execution of the order

**Table I – Retail clients**

Class of Instrument	Swaps and other equity derivatives				
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Top five execution venues ranked in terms of trading volumes (in descending order)					
DASI - DANSKE BANK A/S – SYSTEMATIC INTERNA	100.00 %	100.00 %	0.00 %	100.00 %	0.00 %

**Table II – Professional clients**

Class of Instrument	Swaps and other equity derivatives				
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Top five execution venues ranked in terms of trading volumes (in descending order)					
DASI - DANSKE BANK A/S – SYSTEMATIC INTERNA	100.00 %	100.00 %	0.00 %	100.00 %	0.00 %

## Top five brokers<sup>22</sup>

**Table I – Retail clients**

Class of Instrument	Options and Futures admitted to trading on a trading venue		
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of directed orders
Top five execution brokers ranked in terms of trading volumes (in descending order)			

**Table II – Professional clients**

Class of Instrument	Options and Futures admitted to trading on a trading venue		
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of directed orders
Top five execution brokers ranked in terms of trading volumes (in descending order)			

<sup>22</sup> Data for Equity derivatives – futures and options admitted to trading on a trading venue have been delayed and will be published at a later date.

**Table I - Retail clients**

Class of Instrument	Swaps and other equity derivatives		
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of directed orders
Top five execution brokers ranked in terms of trading volumes (in descending order)			

**Table II - Professional clients**

Class of Instrument	Swaps and other equity derivatives		
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of directed orders
Top five execution brokers ranked in terms of trading volumes (in descending order)			
213800VZMAGVIU2IJA72 - CREDIT LYONNAIS	100.00 %	100.00 %	0.00 %

## *RTS 28 Summary Analysis - Securitized derivatives*

- Warrants and Certificate Derivatives
- Other securitized derivatives

### **Explanation of the relative importance we 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;**

When you place an order with us in securitized derivatives, and for our portfolio management services when we take decision to deal on your behalf, we may execute your order on an execution venue or by sending your order to an external broker for execution.

When we assess the quality of execution for securitized derivatives, the main execution factors we consider are execution price and costs.

Secondary execution factors we take into account when assessing the quality of execution are speed, likelihood of execution, type & size of the order, and settlement.

In the assessment and selection of execution venues and brokers where we believe we can consistently obtain best execution in securitized derivatives for our clients, we consider qualitative factors, such as market access, market share, liquidity, market knowledge & product specialization, market price transparency, order handling process, ratings and trading costs.

To ensure that we are consistently able to deliver best execution to our clients, we monitor on an ongoing basis the quality of execution obtained from the execution venues and brokers used to execute client orders in securitized derivatives. Our monitoring consist both of trade by trade monitoring and overall trend monitoring of the performance of the execution factors.

For a detailed description of how we carry out client orders, application of execution factors and how we prioritise the factors, please refer to our Order Execution Policy.

### **Description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders;**

Danske Bank A/S does not have any close links, conflicts of interests, or common ownerships with respect to any external execution venues or brokers used to execute client orders in securitized derivatives.

Any dealing or relationship between units within Danske Bank A/S is conducted in accordance with Danske Bank A/S's Conflict of Interest Policy. For further information please see our Order Execution Policy including the Portfolio Management Addendum.

### **Description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received;**

Danske Bank A/S does not have any specific arrangements with any external execution venues or brokers used to execute client orders in securitized derivatives regarding payments made or received, discounts, rebates or non-monetary benefits received.

Any dealing or relationship between units within Danske Bank A/S is conducted in accordance with Danske Bank A/S's Conflict of Interest Policy. For further information please see our Order Execution Policy including the Portfolio Management Addendum.

### **Explanation of the factors that led to a change in the list of execution venues listed in our execution policy, if such a change occurred;**

Since publication of our previous RTS 28 Summary Analysis for 2019, we have made changes in the list of execution venues and brokers listed in our Order Execution Policy used for execution of securitized derivatives. The factors that led to a change in the list of execution venues and brokers correspond to the main execution factors and qualitative factors stated above, which we use in the assessment and selection of execution venues and brokers.

**Explanation of how our order execution differs according to client categorisation, where we treat categories of clients differently and where it may affect our order execution arrangements;**

In general, we treat categories of clients in scope of best execution equally in terms of order execution. For retail clients, the best possible result will be determined in terms of the total consideration. Total consideration means the price of the financial instrument together with the costs related to execution, including all expenses incurred by the client that are directly related to the execution of the order.

For professional clients, the best possible result will usually be determined by price and cost, but may be dependent on other execution factors, such as size and type, specific to the order given.

For a detailed description of how we carry out client orders in securitized derivatives, please refer to our Order Execution Policy.

**Explanation of whether we have given other criteria 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;**

For retail clients, the best possible result will always be determined in terms of the total consideration, being the price of the financial instrument together with the costs related to execution, including all expenses incurred by the client that are directly related to the execution of the order.

However, if you as a retail client provide us with instructions regarding an order or any aspect of an order, we will execute the order in accordance with such instructions to the extent reasonably possible, which may prevent us from taking the steps to execute at the best prices and/or costs.

**Explanation of how we have used any data or tools relating to the quality of execution, including any data published under Commission Delegated Regulation (EU) 2017/575 of 8 June 2016 [RTS 27];**

We monitor the quality of execution provided by the execution venues and brokers used to execute client orders in securitized derivatives on a consistent basis, using automatic monitoring tools. In such monitoring we always strive to use external and independent market data against which to compare our execution quality, e.g. the use of order and quote data from third party venues and brokers to assess our execution prices.

Our monitoring also includes exception-based controls, with results reviewed by a specialist team together with front office staff.

For information on our best execution monitoring, please refer to our Order Execution Policy.

**Where applicable, an explanation of how we have used output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU;**

Currently not applicable as no such data have yet been published in accordance with Article 65 of Directive 2014/65/EU (MiFID II Directive).

**Summary of the analysis and conclusions drawn from our monitoring of securitized derivatives;**

We believe that the analysis and conclusions drawn from our monitoring of the quality of execution confirm that the execution venues and brokers used to execute client orders in securitized derivatives meet our standards in delivering best execution to our clients on a consistent basis.

A list of our top five execution venues and brokers used to execute retail and professional client orders can be found below together with detailed information on the volume and number of orders executed by each execution venue and broker. A list of all major execution venues and brokers used to execute client orders in securitized derivatives can be found on our website: <https://danskebank.com/bestexecution>

## Top five venues and brokers – Securitized derivatives

### Top five venues

**Table I – Retail clients**

Class of Instrument	Warrants and Certificate Derivatives				
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders <sup>23</sup>	Percentage of aggressive orders <sup>24</sup>	Percentage of directed orders <sup>25</sup>
Top five execution venues ranked in terms of trading volumes (in descending order)					
XCSE - NASDAQ COPENHAGEN A/S	83.11 %	53.87 %	0.00 %	0.00 %	0.00 %
XNGM - NORDIC GROWTH MARKET	12.05 %	39.65 %	18.00 %	81.95 %	0.00 %
XSTO - NASDAQ STOCKHOLM AB	2.69 %	4.72 %	0.00 %	0.00 %	0.00 %
XOSL - OSLO BORS ASA	1.93 %	0.79 %	100.00 %	0.00 %	0.00 %
XHEL - NASDAQ HELSINKI LTD	0.12 %	0.49 %	0.00 %	0.00 %	0.00 %

**Table II – Professional clients**

Class of Instrument	Warrants and Certificate Derivatives				
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Top five execution venues ranked in terms of trading volumes (in descending order)					
XCSE - NASDAQ COPENHAGEN A/S	81.85 %	70.37 %	0.00 %	0.00 %	0.00 %
BMTF - BLOOMBERG TRADING FACILITY LIMITED	14.67 %	2.47 %	0.00 %	50.00 %	0.00 %
XSTO - NASDAQ STOCKHOLM AB	2.66 %	11.11 %	0.00 %	0.00 %	0.00 %
XHEL - NASDAQ HELSINKI LTD	0.82 %	16.05 %	0.00 %	0.00 %	0.00 %

<sup>23</sup> Orders entered into the order book that provided liquidity

<sup>24</sup> Orders entered into the order book that took liquidity – where Danske Bank A/S is the execution venue, all orders are defined as taking liquidity

<sup>25</sup> Orders where a specific execution venue was specified by the client prior to execution of the order



**Table I – Retail clients**

Class of Instrument	Other securitized derivatives				
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Top five execution venues ranked in terms of trading volumes (in descending order)					
XSTO - NASDAQ STOCKHOLM AB	66.45 %	45.45 %	0.00 %	0.00 %	0.00 %
XCSE - NASDAQ COPENHAGEN A/S	19.53 %	45.45 %	0.00 %	0.00 %	0.00 %
XHEL - NASDAQ HELSINKI LTD	14.02 %	9.09 %	0.00 %	0.00 %	0.00 %

**Table II – Professional clients**

Class of Instrument	Other securitized derivatives				
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Top five execution venues ranked in terms of trading volumes (in descending order)					

## Top five brokers

**Table I – Retail clients**

Class of Instrument	Warrants and Certificate Derivatives		
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of directed orders
Top five execution brokers ranked in terms of trading volumes (in descending order)			
XKZZ2JZF41MRHTR1V493 - CITIGROUP GLOBAL MARKETS LIMITED	63.19 %	30.06 %	0.00 %
549300HN4UKV1E2R3U73 - BOFA SECURITIES, INC.	16.95 %	47.40 %	0.00 %
549300FHOWJAPEHTIQ77 - BOFA SECURITIES EUROPE SA	15.23 %	17.57 %	0.00 %
7LTFWFZYICNSX8D621K86 - DEUTSCHE BANK AKTIENGESELLSCHAFT	2.85 %	3.35 %	0.00 %
4PQUHN3JPFQFN3BB653 - MORGAN STANLEY & CO. INTERNATIONAL PLC	1.78 %	1.62 %	0.00 %

**Table II – Professional clients**

Class of Instrument	Warrants and Certificate Derivatives		
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of directed orders
Top five execution brokers ranked in terms of trading volumes (in descending order)			
XKZZ2JZF41MRHTR1V493 - CITIGROUP GLOBAL MARKETS LIMITED	70.87 %	44.54 %	0.00 %
549300HN4UKV1E2R3U73 - BOFA SECURITIES INC	12.05 %	15.82 %	0.00 %
549300772UJAHRD6L053 - ROBERT W. BAIRD & CO. INCORPORATED	9.53 %	35.62 %	0.00 %
4PQUHN3JPFQFN3BB653 - MORGAN STANLEY & CO. INTERNATIONAL PLC	4.89 %	3.54 %	0.00 %
5299007QVIQ7I064NX37 - UBS EUROPE	1.05 %	0.18 %	0.00 %

**Table I – Retail clients**

Class of Instrument	Other securitized derivatives		
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of directed orders
Top five execution brokers ranked in terms of trading volumes (in descending order)			

**Table II – Professional clients**

Class of Instrument	Other securitized derivatives		
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of directed orders
Top five execution brokers ranked in terms of trading volumes (in descending order)			

## *RTS 28 Summary Analysis - Commodities derivatives and emission allowances derivatives*

- Options and Futures admitted to trading on a trading venue

### **Explanation of the relative importance we 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;**

When you place an order with us in commodity and emission allowances derivatives, and for our portfolio management services when we take decision to deal on your behalf, we execute the order by sending the order to an external broker for execution.

When we assess the quality of execution for commodity and emission allowances derivatives, the main execution factors we consider are execution price and costs.

Secondary execution factors we take into account when assessing the quality of execution are speed, likelihood of execution, type & size of the order, and settlement.

In the assessment and selection of execution venues and brokers where we believe we can consistently obtain best execution in commodity and emission allowances derivatives for our clients, we consider qualitative factors, such as market access, market share, market knowledge & product specialization, reliable quoting, observable yield curves and price spreads, order handling process and trading costs.

To ensure that we are consistently able to deliver best execution to our clients, we monitor on an ongoing basis the quality of execution obtained from the brokers used to execute client orders in commodity and emission allowances derivatives. Our monitoring consists both of trade by trade monitoring and overall trend monitoring of the performance of the execution factors.

For a detailed description of how we carry out client orders, application of execution factors and how we prioritise the factors, please refer to our Order Execution Policy.

### **Description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders;**

Danske Bank A/S does not have any close links, conflicts of interests, or common ownerships with respect to any external execution venues or brokers used to execute client orders in commodity and emission allowances derivatives.

Any dealing or relationship between units within Danske Bank A/S is conducted in accordance with Danske Bank A/S's Conflict of Interest Policy.

### **Description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received;**

Danske Bank A/S does not have any specific arrangements with any external execution venues or brokers used to execute client orders in commodity and emission allowances derivatives regarding payments made or received, discounts, rebates or non-monetary benefits received.

Any dealing or relationship between units within Danske Bank A/S is conducted in accordance with Danske Bank A/S's Conflict of Interest Policy.

### **Explanation of the factors that led to a change in the list of execution venues listed in our execution policy, if such a change occurred;**

Since publication of our previous RTS 28 Summary Analysis for 2019, we have made no such changes in the list of execution venues and brokers listed in our Order Execution Policy used for execution of commodity and emission allowances derivatives.

**Explanation of how our order execution differs according to client categorisation, where we treat categories of clients differently and where it may affect our order execution arrangements;**

In general, we treat categories of clients in scope of best execution equally in terms of order execution.

For retail clients, the best possible result will be determined in terms of the total consideration. Total consideration means the price of the financial instrument together with the costs related to execution, including all expenses incurred by the client that are directly related to the execution of the order.

For professional clients, the best possible result will usually be determined by price and cost, but may be dependent on other execution factors, such as size and type, specific to the order given.

For a detailed description of how we carry out client orders in commodity and emission allowances derivatives, please refer to our Order Execution Policy.

**Explanation of whether we have given other criteria 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;**

For retail clients, the best possible result will always be determined in terms of the total consideration, being the price of the financial instrument together with the costs related to execution, including all expenses incurred by the client that are directly related to the execution of the order.

However, if you as a retail client provide us with instructions regarding an order or any aspect of an order, we will execute the order in accordance with such instructions to the extent reasonably possible, which may prevent us from taking the steps to execute at the best prices and/or costs.

**Explanation of how we have used any data or tools relating to the quality of execution, including any data published under Commission Delegated Regulation (EU) 2017/575 of 8 June 2016 [RTS 27];**

We monitor the quality of execution provided by the brokers used to execute client orders in commodity and emission allowances derivatives on a consistent basis, using automatic monitoring tools. In such monitoring we always strive to use external and independent market data against which to compare our execution quality, e.g. the use of order and quote data from third party venues and brokers to assess our execution prices. If no observable market price is available for a specific instrument, we check the fairness of the price by using relevant market data and, where possible, by making a comparison with similar or comparable products.

Our monitoring also includes exception-based controls, with results reviewed by a specialist team together with front office staff.

For information on our best execution monitoring, please refer to our Order Execution Policy.

**Where applicable, an explanation of how we have used output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU;**

Currently not applicable as no such data have yet been published in accordance with Article 65 of Directive 2014/65/EU (MiFID II Directive).

**Summary of the analysis and conclusions drawn from our monitoring of commodity and emission allowances derivatives;**

We believe that the analysis and conclusions drawn from our monitoring of the quality of execution confirm that the brokers used to execute client orders in commodity and emission allowances derivatives meet our standards in delivering best execution to our clients on a consistent basis.

A list of our top five brokers used to execute retail and professional client orders can be found below together with detailed information on the volume and number of orders executed by each broker. A list of all major brokers used to execute client orders in commodity and emission allowances derivatives can be found on our website: <https://danskebank.com/bestexecution>

## Top five venues and brokers – Commodity and emission allowances derivatives

### Top five venues

**Table I – Retail clients**

Class of Instrument	Futures and options admitted to trading on a trading venue				
Top five execution venues ranked in terms of trading volumes (in descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders <sup>26</sup>	Percentage of aggressive orders <sup>27</sup>	Percentage of directed orders <sup>28</sup>

**Table II – Professional clients**

Class of Instrument	Futures and options admitted to trading on a trading venue				
Top five execution venues ranked in terms of trading volumes (in descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

<sup>26</sup> Orders entered into the order book that provided liquidity

<sup>27</sup> Orders entered into the order book that took liquidity – where Danske Bank A/S is the execution venue, all orders are defined as taking liquidity

<sup>28</sup> Orders where a specific execution venue was specified by the client prior to execution of the order

### Top five brokers

**Table I – Retail clients**

Class of Instrument	Futures and options admitted to trading on a trading venue		
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of directed orders <sup>29</sup>
Top five execution brokers ranked in terms of trading volumes (in descending order)			

**Table II – Professional clients**

Class of Instrument	Futures and options admitted to trading on a trading venue		
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of directed orders
Top five execution brokers ranked in terms of trading volumes (in descending order)			
K6Q0W1PS1L104IQL9C32 - JPMORGAN CHASE & CO	100.00%	100.00%	0.00%

<sup>29</sup> Orders where a specific execution broker was specified by the client prior to execution of the order

## *RTS 28 Summary Analysis - Contracts for difference*

### **Explanation of the relative importance we 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;**

If you receive portfolio management services from us we may take the decision to deal on your behalf in contracts for difference and execute the order by sending the order to an external broker for execution.

When we assess the quality of execution for contracts for difference, the main execution factor we consider is the execution price.

Secondary execution factors we take into account when assessing the quality of execution are costs, speed, likelihood of execution, type & size of the order, and settlement.

In the assessment and selection of execution venues and brokers where we believe we can consistently obtain best execution in contracts for difference for our clients, we consider qualitative factors, such as market access, market share, market liquidity, market knowledge & product specialization, reliable quoting, observable price spreads, order handling process and trading costs.

To ensure that we are consistently able to deliver best execution to our clients, we monitor on an ongoing basis the quality of execution obtained from the execution venues and brokers used to execute client orders in contracts for difference. Our monitoring consists both of trade by trade monitoring and overall trend monitoring of the performance of the execution factors.

For a detailed description of how we carry out client orders, application of execution factors and how we prioritise the factors, please refer to our Order Execution Policy.

### **Description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders;**

Danske Bank A/S does not have any close links, conflicts of interests, or common ownerships with respect to any external execution venues or brokers used to execute client orders in contracts for difference.

Any dealing or relationship between units within Danske Bank A/S is conducted in accordance with Danske Bank A/S's Conflict of Interest Policy. For further information please see our Order Execution Policy including the Portfolio Management Addendum.

### **Description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received;**

Danske Bank A/S does not have any specific arrangements with any external execution venues or brokers used to execute client orders in contracts for difference regarding payments made or received, discounts, rebates or non-monetary benefits received.

Any dealing or relationship between units within Danske Bank A/S is conducted in accordance with Danske Bank A/S's Conflict of Interest Policy. For further information please see our Order Execution Policy including the Portfolio Management Addendum.

### **Explanation of the factors that led to a change in the list of execution venues listed in our execution policy, if such a change occurred;**

Since publication of our previous RTS 28 Summary Analysis for 2019, we have made changes in the list of execution venues and brokers listed in our Order Execution Policy used for execution of contracts for difference. The factors that led to a change in the list of execution venues and brokers correspond to the main execution factors and qualitative factors stated above, which we use in the assessment and selection of execution venues and brokers.

### **Explanation of how our order execution differs according to client categorisation, where we treat categories of clients differently and where it may affect our order execution arrangements;**

In general, we treat categories of clients in scope of best execution equally in terms of order execution.



For retail clients, the best possible result will be determined in terms of the total consideration. Total consideration means the price of the financial instrument together with the costs related to execution, including all expenses incurred by the client that are directly related to the execution of the order.

For professional clients, the best possible result will usually be determined by price and cost, but may be dependent on other execution factors, such as size and type, specific to the order given.

For a detailed description of how we carry out client orders in contracts for difference, please refer to our Order Execution Policy.

**Explanation of whether we have given other criteria 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;**

For retail clients, the best possible result will always be determined in terms of the total consideration, being the price of the financial instrument together with the costs related to execution, including all expenses incurred by the client that are directly related to the execution of the order.

However, if you as a retail client provide us with instructions regarding an order or any aspect of an order, we will execute the order in accordance with such instructions to the extent reasonably possible, which may prevent us from taking the steps to execute at the best prices and/or costs.

**Explanation of how we have used any data or tools relating to the quality of execution, including any data published under Commission Delegated Regulation (EU) 2017/575 of 8 June 2016 [RTS 27];**

We monitor the quality of execution provided by the brokers used to execute client orders in contracts for difference on a consistent basis, using automatic monitoring tools. In such monitoring we always strive to use external and independent market data against which to compare our execution quality, e.g. the use of order and quote data from third party venues and brokers to assess our execution prices. If no observable market price is available for a specific instrument, we check the fairness of the price by using relevant market data and, where possible, by making a comparison with similar or comparable products.

Our monitoring also includes exception-based controls, with results reviewed by a specialist team together with front office staff.

For information on our best execution monitoring, please refer to our Order Execution Policy.

**Where applicable, an explanation of how we have used output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU;**

Currently not applicable as no such data have yet been published in accordance with Article 65 of Directive 2014/65/EU (MiFID II Directive).

**Summary of the analysis and conclusions drawn from our monitoring of contracts for difference;**

We believe that the analysis and conclusions drawn from our monitoring of the quality of execution confirm that the brokers used to execute client orders in contracts for difference meet our standards in delivering best execution to our clients on a consistent basis.

A list of our top five brokers used to execute retail and professional client orders can be found below together with detailed information on the volume and number of orders executed by each execution venue and broker. A list of all major brokers used to execute client orders in contracts for difference can be found on our website:

<https://danskebank.com/bestexecution>

## *Top five venues and brokers – Contracts for difference*

### Top five venues

**Table I – Retail clients**

Class of Instrument	Contracts for Difference				
Top five execution venues ranked in terms of trading volumes (in descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders <sup>30</sup>	Percentage of aggressive orders <sup>31</sup>	Percentage of directed orders <sup>32</sup>

**Table II – Professional clients**

Class of Instrument	Contracts for Difference				
Top five execution venues ranked in terms of trading volumes (in descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

---

<sup>30</sup> Orders entered into the order book that provided liquidity

<sup>31</sup> Orders entered into the order book that took liquidity – where Danske Bank A/S is the execution venue, all orders are defined as taking liquidity

<sup>32</sup> Orders where a specific execution venue was specified by the client prior to execution of the order

## Top five brokers

**Table I – Retail clients**

Class of Instrument	Contracts for Difference		
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of directed orders
Top five execution brokers ranked in terms of trading volumes (in descending order)			

**Table II – Professional clients**

Class of Instrument	Contracts for Difference		
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of directed orders
Top five execution brokers ranked in terms of trading volumes (in descending order)			
W22LROWP2IHZNBB6K528 - GOLDMAN SACHS INTERNATIONAL	71.61 %	80.14 %	0.00 %
4PQUHN3JPFGFNF3BB653 - MORGAN STANLEY & CO. INTERNATIONAL PLC	27.26 %	18.76 %	0.00 %
K6Q0W1PS1L104IQL9C32 - JPMORGAN CHASE & CO	0.47 %	0.26 %	0.00 %
XKZZ2JZF41MRHTR1V493 - CITIGROUP GLOBAL MARKETS LIMITED	0.30 %	0.13 %	0.00 %
549300FHOWJAPEHTIQ77 - BOFA SECURITIES EUROPE SA	0.19 %	0.58 %	0.00 %

## *RTS 28 Summary Analysis - Exchange traded products*

- Exchange traded funds, exchange traded notes and exchange traded commodities

### **Explanation of the relative importance we 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;**

When you place an order with us in exchange traded products, and for our portfolio management services when we take decision to deal on your behalf, we may execute your order on an execution venue or by sending your order to an external broker for execution.

When we assess the quality of execution for exchange traded products, the main execution factors we consider are execution price and costs.

Secondary execution factors we take into account when assessing the quality of execution are speed, likelihood of execution, type & size of the order, and settlement.

In the assessment and selection of execution venues and brokers where we believe we can consistently obtain best execution in exchange traded products for our clients, we consider qualitative factors, such as market access, market share, liquidity, market knowledge & product specialization, market price transparency, order handling process, ratings and trading costs.

To ensure that we are consistently able to deliver best execution to our clients, we monitor on an ongoing basis the quality of execution obtained from the execution venues and brokers used to execute client orders in exchange traded products. Our monitoring consists both of trade by trade monitoring and overall trend monitoring of the performance of the execution factors.

For a detailed description of how we carry out client orders, application of execution factors and how we prioritise the factors, please refer to our Order Execution Policy.

### **Description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders;**

Danske Bank A/S does not have any close links, conflicts of interests, or common ownerships with respect to any external execution venues or brokers used to execute client orders in exchange traded products.

Any dealing or relationship between units within Danske Bank A/S is conducted in accordance with Danske Bank A/S's Conflict of Interest Policy. For further information please see our Order Execution Policy including the Portfolio Management Addendum.

### **Description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received;**

Danske Bank A/S does not have any specific arrangements with any external execution venues or brokers used to execute client orders in exchange traded products regarding payments made or received, discounts, rebates or non-monetary benefits received.

Any dealing or relationship between units within Danske Bank A/S is conducted in accordance with Danske Bank A/S's Conflict of Interest Policy. For further information please see our Order Execution Policy including the Portfolio Management Addendum.

### **Explanation of the factors that led to a change in the list of execution venues listed in our execution policy, if such a change occurred;**

Since publication of our previous RTS 28 Summary Analysis for 2019, we have made changes in the list of execution venues and brokers listed in our Order Execution Policy used for execution of exchange traded products. The factors that led to a change in the list of execution venues and brokers correspond to the main execution factors and qualitative factors stated above, which we use in the assessment and selection of execution venues and brokers.

**Explanation of how our order execution differs according to client categorisation, where we treat categories of clients differently and where it may affect our order execution arrangements;**

In general, we treat categories of clients in scope of best execution equally in terms of order execution.

For retail clients, the best possible result will be determined in terms of the total consideration. Total consideration means the price of the financial instrument together with the costs related to execution, including all expenses incurred by the client that are directly related to the execution of the order.

For professional clients, the best possible result will usually be determined by price and cost, but may be dependent on other execution factors, such as size and type, specific to the order given.

For a detailed description of how we carry out client orders in exchange traded products, please refer to our Order Execution Policy.

**Explanation of whether we have given other criteria 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;**

For retail clients, the best possible result will always be determined in terms of the total consideration, being the price of the financial instrument together with the costs related to execution, including all expenses incurred by the client that are directly related to the execution of the order.

However, if you as a retail client provide us with instructions regarding an order or any aspect of an order, we will execute the order in accordance with such instructions to the extent reasonably possible, which may prevent us from taking the steps to execute at the best prices and/or costs.

**Explanation of how we have used any data or tools relating to the quality of execution, including any data published under Commission Delegated Regulation (EU) 2017/575 of 8 June 2016 [RTS 27];**

We monitor the quality of execution provided by the execution venues and brokers used to execute client orders in exchange traded products on a consistent basis, using automatic monitoring tools. In such monitoring we always strive to use external and independent market data against which to compare our execution quality, e.g. the use of order and quote data from third party venues and brokers to assess our execution prices.

Our monitoring also includes exception-based controls, with results reviewed by a specialist team together with front office staff.

For information on our best execution monitoring, please refer to our Order Execution Policy.

**Where applicable, an explanation of how we have used output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU;**

Currently not applicable as no such data have yet been published in accordance with Article 65 of Directive 2014/65/EU (MiFID II Directive).

**Summary of the analysis and conclusions drawn from our monitoring of exchange traded products;**

We believe that the analysis and conclusions drawn from our monitoring of the quality of execution confirm that the execution venues and brokers used to execute client orders in exchange traded products meet our standards in delivering best execution to our clients on a consistent basis.

A list of our top five execution venues and brokers used to execute retail and professional client orders can be found below together with detailed information on the volume and number of orders executed by each execution venue and broker. A list of all major execution venues and brokers used to execute client orders in exchange traded products can be found on our website: <https://danskebank.com/bestexecution>

## Top five venues and brokers – Exchange traded products

### Top five venues

**Table I – Retail clients**

Class of Instrument	Exchange traded funds, notes and commodities				
Top five execution venues ranked in terms of trading volumes (in descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders <sup>33</sup>	Percentage of aggressive orders <sup>34</sup>	Percentage of directed orders <sup>35</sup>
XCSE - NASDAQ COPENHAGEN A/S	65.61 %	84.80 %	0.00 %	0.00 %	0.00 %
DASI - DANSKE BANK A/S - SYSTEMATIC	17.72 %	7.52 %	0.00 %	100.00 %	0.00 %
BMTF - BLOOMBERG TRADING FACILITY LIMITED	7.76 %	0.07 %	0.00 %	0.00 %	0.00 %
TREU - TRADEWEB EUROPE LIMITED	4.83 %	0.34 %	0.00 %	100.00 %	0.00 %
XSTO - NASDAQ STOCKHOLM AB	2.29 %	3.20 %	0.83 %	0.00 %	0.00 %

**Table II – Professional clients**

Class of Instrument	Exchange traded funds, notes and commodities				
Top five execution venues ranked in terms of trading volumes (in descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
BMTF - BLOOMBERG TRADING FACILITY LIMITED	58.89 %	8.15 %	0.00 %	0.00 %	0.00 %
TREU - TRADEWEB EUROPE LIMITED	33.63 %	41.46 %	0.00 %	100.00 %	0.00 %
XSTO - NASDAQ STOCKHOLM AB	4.78 %	38.05 %	0.28 %	0.00 %	44.56 %
XCSE - NASDAQ COPENHAGEN A/S	2.23 %	8.70 %	0.00 %	0.00 %	0.00 %
DASI - DANSKE BANK A/S - SYSTEMATIC	0.32 %	0.66 %	0.00 %	100.00 %	0.00 %

<sup>33</sup> Orders entered into the order book that provided liquidity

<sup>34</sup> Orders entered into the order book that took liquidity – where Danske Bank A/S is the execution venue, all orders are defined as taking liquidity

<sup>35</sup> Orders where a specific execution venue was specified by the client prior to execution of the order

## Top five brokers

**Table I – Retail clients**

Class of Instrument	Exchange traded funds, notes and commodities		
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of directed orders
Top five execution brokers ranked in terms of trading volumes (in descending order)			
549300FHOWJAPEHTIQ77 - BOFA SECURITIES EUROPE SA	61.57 %	60.22 %	0.00 %
XKZZ2JZF41MRHTR1V493 - CITIGROUP GLOBAL MARKETS LIMITED	24.76 %	12.73 %	0.00 %
549300HN4UKV1E2R3U73 - BOFA SECURITIES, INC.	7.75 %	20.37 %	0.00 %
4PQUHN3JPFGFNF3BB653 - MORGAN STANLEY & CO. INTERNATIONAL PLC	2.83 %	1.97 %	0.00 %
549300772UJAHRD6L053 - ROBERT W. BAIRD & CO. INCORPORATED	1.18 %	2.93 %	0.00 %

**Table II – Professional clients**

Class of Instrument	Exchange traded funds, notes and commodities		
	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of directed orders
Top five execution brokers ranked in terms of trading volumes (in descending order)			
4PQUHN3JPFGFNF3BB653 - MORGAN STANLEY & CO. INTERNATIONAL PLC	69.82 %	62.21 %	0.00 %
549300772UJAHRD6L053 - ROBERT W. BAIRD & CO. INCORPORATED	24.47 %	34.05 %	0.00 %
213800EEC95PRUCEUP63 - VIRTU ITG EUROPE LIMITED	2.49 %	2.42 %	0.00 %
XKZZ2JZF41MRHTR1V493 - CITIGROUP GLOBAL MARKETS LIMITED	1.72 %	0.73 %	0.00 %
213800VZMAGVIU2IJA72 - CREDIT LYONNAIS	0.57 %	0.19 %	0.00 %