

Report on Top 5 Execution Venues and related information

For Retail Clients

Objective

Directive 2014/65/EU of the Parliament and the Council of 15 May 2014 on markets in financial instruments (MiFID II) and its delegated legislation require Luminor Bank AB (the Bank) to summarise and make public on an annual basis, the top five execution venues for each class of financial instruments in terms of trading volumes where the Bank has executed or transmitted client orders in the preceding year as well as to prepare a summary of the analysis and conclusions of monitoring of the quality of execution obtained.

This report (the Report) is intended to enable the public and investors to evaluate the quality of the Bank's execution practices by requiring publication of valuable information about how and where the Bank has executed client orders.

This Report is prepared for the period from 1 January 2017 to 31 December 2017. Considering that the Report is prepared for the period before MIFID II and delegated legislation came into force, the Bank is not able to fully report on information which is not available or applicable in relation to the preceding year. The Report is prepared on best effort basis, but may lack some granularity in comparison to subsequent reports due to the lack of data on the identification of the subclasses of the classes of financial instruments based on liquidity, lack of a complete information on the exact proportion of passive and aggressive orders executed on each of the execution venues it used in the previous year, as well as other information because collection of such detailed information under MiFID I best execution obligations has not been required.

Relative importance given to the execution factors and differences according to client categorisation

The Bank has considered a number of factors that might be important to clients when the Bank executes their orders. Price, costs, speed of execution, likelihood of execution and settlement, size and nature as well as other factors that may be relevant to the order (for example, market impact – the effect that executing client's order, or showing it to market participants, might have upon the market).

When the Bank executes orders on behalf of retail (non-professional) clients, best execution is determined on the basis of the total consideration paid by the client. Total consideration is the price of the financial instrument and the costs related to execution, including all expenses incurred by the client which are directly related to the execution of the order such as venue execution fees, clearing and settlement fees and any other fees paid to third parties involved in the execution of the order. When assessing whether best execution has been achieved, the Bank does not take into account its standard charges that will be paid by the client irrespective of how the order is executed.

When the Bank executes orders on behalf of professional clients, it will use reasonable judgement to weigh different execution factors at the time of execution in accordance with execution criteria. Even where it seems that the price of financial instruments was not the best available, the order may still be considered executed on the terms most favourable to the client.

More information is available in The Policy for Execution of Orders in Financial Instruments, which is published on the Bank's website.

Description of close links with execution venues and potential conflicts of interest

As of 1 October 2017 the sole shareholder of the Bank is a holding company Luminor Group AB (a Swedish resident) owned by Nordea Bank AB (publ) and DNB Bank ASA having equal voting rights.

No.	Execution venue	Description of Close Link
1.	Luminor Bank AB	When executing client orders in particular financial instruments, the Bank may source liquidity from its own trading book and/or act as a principal to client (on own account) being an execution venue itself.
2.	Nordea Bank AB (publ)	An indirect shareholder of the Bank, holding 56,2% shares in Luminor Group AB
3.	Nordea Asset Management Luxembourg	Group company of Nordea Bank AB (publ), which is indirect shareholder of the Bank

Detailed information on use of each execution venue having close links with the Bank in respect of particular class of financial instrument is disclosed in tables 1-9 of the Report as well as the Policy for Execution of Orders in Financial Instruments.

The Bank itself does not hold common ownership in any execution venue.

Conflicts of interests that potentially may arise when executing or transmitting for execution client orders to execution venues having close links with the Bank are managed according to the Bank's Policy of Avoiding Conflicts of Interest in Providing Investment Services which is published on the Bank's website.

Description of specific arrangements

The Bank has different specific arrangements with particular counterparties being execution venues at the same time. Depending on the business set-up in particular cases the Bank may receive monetary benefit from such counterparties for different services: distribution of particular financial instruments, safeguarding of financial instruments, introducing counterparty's services to the Bank's clients, etc. The detailed explanation on inducements received by the Bank, as well as its management is disclosed in the Inducement Policy for the Provision of Investment and Ancillary Services which is published on the Bank's website.

Definitions

Passive order – an order that is submitted to a venue which runs an order book and provided liquidity on the order book

Aggressive order – an order that is submitted to a venue which runs an order book and took liquidity on the order book

Directed order – an order where a specific execution venue was specified by the client prior to the execution of the order

1. Equities – Shares & Depository Receipts – Tick size liquidity band 5 and 6*

Class of Instrument	Equities – Shares & Depository Receipts – Tick size liquidity band 5 and 6
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Notification if <1 average trade per business day in the previous year	Y				
Top five execution venues ranked in terms of trading volumes (descending)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Nasdaq OMX Tallinn - XTAL	80.4%	88.1%			
Nasdaq OMX Vilnius - XVIL	19.6%	11.9%			

*Tick size liquidity band 5 and 6 is for financial instruments, which are traded at least 2000 times a day.

2. Equities – Shares & Depository Receipts – Tick size liquidity band 1 and 2*

Class of Instrument	Equities – Shares & Depository Receipts – Tick size liquidity band 5 and 6				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Nasdaq OMX Vilnius - XVIL	67.5%	68.9%			
Nasdaq OMX Tallinn - XTAL	18.7%	19.0%			
Nasdaq OMX Riga - XRIG	13.8%	12.1%			

*Tick size liquidity band 1 and 2 is for financial instruments, which are traded from 0 to 79 times a day.

3. Debt Instruments – Bonds

Class of Instrument	Debt Instruments - Bonds				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Luminor Bank AB - 213800ZY8OD37RG14E67	100%	100%			

4. Interest Rate Derivatives - Swaps, forwards, and other interest rates derivatives

Class of Instrument	Interest Rate Derivatives - Swaps, forwards, and other interest rates derivatives				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution venues ranked in terms of trading volumes (descending)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Luminor Bank AB - 213800ZY8OD37RG14E67	100%	100%			

5. Currency Derivatives - Swaps, forwards, and other currency derivatives

Class of Instrument	Currency Derivatives - Swaps, forwards, and other currency derivatives				
Notification if <1 average trade per business day in the previous year	N				

Top five execution venues ranked in terms of trading volumes (descending)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Luminor Bank AB - 213800ZY8OD37RG14E67	93.0%	39.0%			
Saxo Bank A/S - 549300TL5406IC1XKD09	7.0%	61.0%			

6. Commodities derivatives and emission allowances Derivatives - Other commodities derivatives and emission allowances derivatives

Class of Instrument	Commodities derivatives and emission allowances Derivatives - Other commodities derivatives and emission allowances derivatives				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution venues ranked in terms of trading volumes (descending)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Luminor Bank AB - 213800ZY8OD37RG14E67	100%	100%			

7. Contracts for Difference

Class of Instrument	Contracts for Difference
Notification if <1 average trade per business day in the previous year	N

Top five execution venues ranked in terms of trading volumes (descending)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Saxo Bank A/S - 549300TL5406IC1XKD09	100.0%	100.0%			

8. Structured finance instruments

Class of Instrument	Structured finance instruments				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Nordea Bank AB (publ) - 6SCPQ280AIY8EP3XFW53	100.0%	100.0%			

9. Other

Class of Instrument	Other				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

Nordea Investment Funds S.A. - 549300LCQXMRSWPKT48	100.0%	100.0%			
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