

# Citadel Europe LLP

MiFID II RTS 28 Best Execution Disclosure

Exchange Traded Products – Exchange Traded Funds, Exchange Traded Notes and Exchange Traded Commodities - Executed

April 2019

**Quality of Execution Obtained on Execution Venues<sup>1</sup>**

<b>Firm</b>	Citadel Europe LLP	
<b>Disclosure Period</b>	1 January 2018 to 31 December 2018	
<b>Publication Date</b>	April 2019	
<b>Class of instrument</b>	Exchange Traded Products – Exchange Traded Funds, Exchange Traded Notes and Exchange Traded Commodities - Executed	
	<b>Summary of Analysis</b>	<b>Conclusion</b>
<b>Execution factors</b>	<p>The relative importance of the execution factors was determined by the following execution criteria:</p> <ul style="list-style-type: none"> <li>• the characteristics of the Citadel Fund</li> <li>• the characteristics of the order</li> <li>• the characteristics of the financial instrument to which the order related (e.g. Source ETFs or otherwise); and</li> <li>• the characteristics of the broker or trading venue/systematic internaliser/market maker/liquidity provider/ third country entity performing a similar function to which the order could be directed.</li> </ul>	<p>Given the liquidity of, and transparency for, these instruments the Firm considered price to be the most important execution factor when assessing quality of execution. Therefore in monitoring quality of execution for these instruments, the Firm has used slippage as a tool to consider whether best execution has been provided by the execution venues.</p>
<b>Close links, conflicts of interest and common ownership with respect to execution venues<sup>2</sup></b>	<p><b>Close links</b> The Firm has no close links to report.</p>	<p><b>Close links</b> Not applicable</p>
	<p><b>Conflicts of interest</b> The Firm has no conflicts of interest to report.</p>	<p><b>Conflicts of interest</b> Not applicable</p>
	<p><b>Common ownerships</b> The Firm has no common ownership to report.</p>	<p><b>Common ownerships</b> Not applicable</p>
<b>Specific arrangements with execution venues<sup>2</sup> regarding payments made or received, discounts, rebates or non-monetary benefits received</b>	<p>During the period under review only research and business gifts and entertainments were received. No payments were made to or received from execution venues except as related to the settlement of transactions. In addition no discounts or rebates were received.</p>	<p>The Firm followed its Compliance Manual and Business Gifts &amp; Entertainment Policy in line with its regulatory obligations in relation to these arrangements. No issues were noted in respect of these non-monetary benefits received. In addition these arrangements did not influence the Firm's selection of execution venues, as the Firm followed its Best Execution Policy and Conflicts of Interest Policy when selecting execution venues.</p>
<b>Factors leading to a change in the list of execution venues<sup>2</sup> listed in the order execution policy</b>	<p>There were no changes to the list of execution venues referred to in the Firm's Best Execution Policy. However as a result of the ongoing monitoring of the quality of execution, the allocation of orders to the various execution venues changed throughout the period under review.</p>	<p>The factors leading to such changes were objective factors which were considered and applied by the Firm on an objective basis.</p>

<sup>1</sup> This report has been produced in line with the requirements of the recast Markets in Financial Instruments Directive and Regulation (together, "MiFID II") and Regulatory Technical Standard ("RTS") 28, as implemented in the UK.

<sup>2</sup> For the purposes of this report, execution venue means broker, trading venue, systematic internaliser, market maker, liquidity provider and/or third country entity performing a similar function.

<b>Differentiation across client categories</b>	All of the Firm's clients are professional clients.	Not applicable
<b>Use of data / tools relating to quality of execution</b>	The Firm has used a variety of data and tools relating to quality of execution during the period under review in order to inform both its real-time and periodic assessments.	These objective factors were considered and applied by the Firm on an objective basis.
<b>Use of consolidated tape provider output</b>	There were no consolidated tape providers during the period under review.	Not applicable

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