

MiFID 2 Best Execution Report

MiFID 2 requires that firms publish, for each class of financial instrument, a summary of the analysis and conclusions they draw from their detailed monitoring of the quality of execution obtained on the execution venues where they executed all client orders in the previous year.

The below data and summary analysis relates to orders executed by OTC Europe LLP in 2017

Financial Instrument Class 1	Options, Futures and Swaps: Traded On Trading Venue				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
ICE Clear Europe LEI: 5R6J7JCQRIPQR1EEP713	100%	100%	N/A	N/A	N/A
NASDAQ (EU) Nasdaq Clearing Aktiebolag (AB) LEI: 54930002A8LR1AAUCU78	0%	0%	N/A	N/A	N/A

Financial Instrument Class 2	Other Commodity Derivatives: Non-Traded On Trading Venue				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
CME Group Inc LEI: LCZ7XYGSLJUHFXNXD88	99.6%	95.3%	N/A	N/A	N/A
ICE Futures US LEI: 5493004R83R1LVX2IL36	0.4%	4.7%	N/A	N/A	N/A
NASDAQ (US) NASDAQ OMX Commodities Clearing Company LEI: 5493008EIVLUXM0PQX05	0%	0%	N/A	N/A	N/A

<p>(a) an explanation of the relative importance the firm gave to the execution factors of price, costs, speed, likelihood of execution or any other consideration including qualitative factors when assessing the quality of execution;</p>	<p>Venue/Exchange choice for OTCE is linked to product availability and thus execution is restricted to ICE (EU/US) and/or CME (NYMEX) due to the liquidity held by these exchanges - (ICE EU being the only European venue used). Price/costs/speed are not generally factored in to execution. Clients will place orders for execution with brokers; OTCE do not execute without client orders. OTCE do not hold trades/positions for clients, simple execution only services.</p>
<p>(b) a description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders;</p>	<p>No close links/common ownership; exchange rebates are provided, (detailed below) but these are not considered a conflict of interest as (i) brokers do not benefit from rebates (ii) rebates do not affect venue choice as (explained above) this is down to product availability. As such rebates do not affect OTCE's ability to act in the best interests of its clients.</p>
<p>(c) a description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received;</p>	<p>Both ICE (EU/US) and CME provide rebates for use of the exchange. These rebates are based on the volumes of trades executed on that venue.</p>
<p>(d) an explanation of the factors that led to a change in the list of execution venues listed in the firm's execution policy, if such a change occurred;</p>	<p>No change in execution venue.</p>
<p>(e) an explanation of how order execution differs according to client categorisation, where the firm treats categories of clients differently and where it may affect the order execution arrangements;</p>	<p>Order execution does not differ depending on client categorisation.</p>
<p>(f) an explanation of whether other criteria were given precedence over immediate price and cost when executing retail client orders and how these other criteria were instrumental in delivering the best possible result in terms of the total consideration to the client;</p>	<p>No other criteria are given precedence over price/cost. OTCE does not conduct business on behalf of retail clients.</p>
<p>(g) an explanation of how the investment firm has used any data or tools relating to the quality of execution, including any data published under Commission Delegated Regulation (EU)</p>	<p>OTCE collect/review market information from a number of sources (including but not limited to: CNBC, Bloomberg, Reuters, ICE, etc.) This information is used to assist OTCE with ensuring best execution on behalf of its clients.</p>
<p>(h) where applicable, an explanation of how the investment firm has used output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU.</p>	<p>Not Applicable.</p>