RTS 28 Quality of Execution Annual Report

Firm: Brigade Capital Europe Management LLP (the "Firm")
Disclosure Period: 1 January 2018 to 31 December 2018

The Markets in Financial Instruments Directive and the Markets in Financial Instruments Regulation (together, "MiFID2"), and Regulatory Technical Standard ("RTS") 28 (Delegated Regulation (EU) 2017/576), as implemented in the UK, require MiFID investment firms to publish on an annual basis: (i) a list of their top 5 execution venues (including brokers) in terms of trading volumes for all executed client orders per class of financial instruments; (ii) a list of their top 5 execution venues (including brokers) in terms of trading volumes for all executed client orders in securities financing transactions per class of financial instruments; and (iii) for each class of financial instrument, a summary of the analysis and conclusions they draw from their monitoring of the quality of execution obtained on execution venues (including brokers) where they executed all client orders in the previous year.

Summary of classes of instruments included in this report, and class of instruments not included in this report (because the Firm has not executed client orders in that class of instruments):

Classes of instruments included in this report	Classes of instruments not included in this report	
Debt instruments	 Equities – Shares & Depositary Receipts Tick size liquidity bands 5 and 6 (from 2000 trades per day) Tick size liquidity bands 3 and 4 (from 80 to 1999 trades per day) Tick size liquidity band 1 and 2 (from 0 to 79 trades per day) Debt instruments 	
	 Money markets instruments Interest rates derivatives Futures and options admitted to trading on a trading venue Swaps, forwards, and other interest rates derivatives 	
	 Credit derivatives Futures and options admitted to trading on a trading venue Other credit derivatives Currency derivatives 	
	 Futures and options admitted to trading on a trading venue Swaps, forwards, and other currency derivatives Structured finance instruments Equity Derivatives 	
	 Options and Futures admitted to trading on a trading venue Swaps and other equity derivatives Securitized Derivatives Warrants and Certificate Derivatives 	
	 Other securitized derivatives Commodities derivatives and emission allowances Derivatives Options and Futures admitted to trading on a trading venue Other commodities derivatives and emission allowances derivatives Contracts for difference 	
	 Exchange traded products (Exchange traded funds, exchange traded notes and exchange traded commodities) Emission allowances Other instruments 	

Class of instrument	Debt instruments		
	o Bonds		
General observations	The Firm transmits all orders to its affiliate, Brigade Capital UK LLP, for execution and the Firm does not execute any orders directly with execution venues. Brigade Capital UK LLP (which is authorised and regulated as an investment firm by the UK Financial Conduct Authority) shares the same order execution policy as the Firm and the transmission of orders to Brigade Capital UK LLP does not therefore impact the quality of execution achieved.		
	Summary of analysis	Conclusion	
Execution factors	The Firm transmitted all orders to its affiliate, Brigade Capital UK LLP, for execution. Please see the Brigade Capital UK LLP RTS 28 Quality of Execution Annual Report for details on its execution of the transmitted orders.	N/A	
Close links, conflicts of interest and	Close links and common ownership		
common ownership with respect to execution venues	The Firm transmits all orders to Brigade Capital UK LLP for execution. Brigade Capital UK LLP is a commonly-controlled affiliate of the Firm. The Firm has no close links or common ownership with any other executing broker or venue. Conflicts of interest	The Firm's close link and common ownership relationship with Brigade Capital UK LLP does not influence the quality of execution achieved by the Firm, as Brigade Capital UK LLP follows the same order execution policy as the Firm and its interests are aligned with the Firm.	
	The Firm has a conflicts of interest policy designed to identify and mitigate any potential conflicts of interest which may affect the quality of execution. The Firm is not aware of any conflicts of interest that would impact its ability to achieve best execution.	To the extent that the Firm becomes aware of any conflict of interest, it shall be handled in accordance with the Firm's conflict of interest policy.	
Specific arrangements with execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received	The Firm has no specific arrangements to report, save as disclosed above.	N/A	
Factors leading to a change in the list of execution venues listed in the order execution policy	N/A - the Firm transmits all orders to its affiliate for execution and there have been no changes to this arrangement.	N/A	
Differentiation across client categories	N/A - all of the Firm's clients are professional clients.	N/A	
Use of data / tools relating to quality of execution	The Firm monitors the quality of execution (carried out by Brigade Capital UK LLP on its behalf), taking several factors into account and using data and/or tools where considered appropriate.	N/A	
Use of consolidated tape provider output	The Firm did not utilise any output from any EU-authorised consolidated tape provider during the reporting period.	N/A	
Use of DEA	N/A		