

RTS 28 Quality of Execution Annual Report

Firm: Brigade Capital Europe Management LLP (the “Firm”)

Disclosure Period: 1 January 2019 to 31 December 2019

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
<ul style="list-style-type: none"> • Debt instruments <ul style="list-style-type: none"> ○ Bonds • Securities Financing Transactions 	<ul style="list-style-type: none"> • Equities – Shares & Depositary Receipts <ul style="list-style-type: none"> ○ 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 <ul style="list-style-type: none"> ○ Money markets instruments • Interest rates derivatives <ul style="list-style-type: none"> ○ Futures and options admitted to trading on a trading venue ○ Swaps, forwards, and other interest rates derivatives • Credit derivatives <ul style="list-style-type: none"> ○ Futures and options admitted to trading on a trading venue ○ Other credit derivatives • Currency derivatives <ul style="list-style-type: none"> ○ Futures and options admitted to trading on a trading venue ○ Swaps, forwards, and other currency derivatives • Structured finance instruments • Equity Derivatives <ul style="list-style-type: none"> ○ Options and Futures admitted to trading on a trading venue ○ Swaps and other equity derivatives • Securitized Derivatives <ul style="list-style-type: none"> ○ Warrants and Certificate Derivatives ○ Other securitized derivatives • Commodities derivatives and emission allowances Derivatives <ul style="list-style-type: none"> ○ 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 ○ 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

Class of instrument	Securities Financing Transactions	
<p>General observations</p>	<p>The Firm executed all trades directly on an execution venue (which for these purposes includes OTC counterparties). The Firm's top 5 execution venues by trading volume are disclosed by separate document (the "Top 5 Report").</p> <p>The entities listed in the Top 5 Report were selected based on the quality of executions obtainable, with consideration given to the following factors:</p> <ul style="list-style-type: none"> • Price – <ul style="list-style-type: none"> ○ For bespoke, highly negotiated transactions or for those which may be original trading ideas or for which the Firm has a duty of confidentiality to the originating firm, the Firm will route such orders exclusively to the originating firm since there will be no other available market liquidity within a reasonable timeframe; and ○ For some more standardised products, the Firm will usually select and price poll from a shortlist of dealing counterparties identified by the Firm to be among the most competitive in the field concerned. • Other execution factors - The following factors may have taken precedence over price in the following circumstances: <ul style="list-style-type: none"> ○ Costs – Where total costs of acquisition, transfer and/or disposal outweighed the higher price differential. ○ Speed – Where necessary around a particular event (e.g. an earnings update that we think will be different from market expectations). ○ Likelihood of execution – In circumstances where the liquidity/illiquidity of the instrument required it and/or where there was uncertainty in a trader's ability to execute. ○ Order size - As per "Likelihood of execution" above. ○ Nature – This is a broad category. There are a number of circumstances that could cause these factors to take precedent over price (e.g. relationship with dealer; etc.). ○ Venue - if it was necessary to buy/sell on the same venue to close a trade. ○ Market Discretion - Where necessary to minimise third party knowledge of our intended trade and/or position. 	
<p>Execution factors</p>	<p style="text-align: center;">Summary of analysis</p> <p>The relative importance of the execution factors was determined as follows, in accordance with the Firm's execution policy:</p> <ul style="list-style-type: none"> ○ The characteristics of the client including the categorisation of the client as professional; ○ The characteristics of the client order (if there is a client order); ○ The characteristics of financial instruments that are the subject of that client order; and ○ The characteristics of the execution venues or brokers to which that order can be directed. 	<p style="text-align: center;">Conclusion</p> <p>The relative importance given to the execution factors was in line with the Firm's order execution policy.</p>

Close links, conflicts of interest and common ownership with respect to execution venues	Close links and common ownership The Firm has no close links or common ownership with any executing broker or venue, other than its affiliate, Brigade Capital UK LLP, to which it transmits orders (other than orders for securities financing transactions) for execution.	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.
	Conflicts of interest 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 (other than orders for securities financing transactions) 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 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-authorized consolidated tape provider during the reporting period.	N/A
Use of DEA	N/A	