

Best Execution Information

Report is a summary of the analysis and conclusion drawn from HSBC Private Bank's (Luxembourg) SA detailed monitoring of the quality of execution obtained on the execution venues where all client orders were executed in 2019.

Class of Instrument: Commodity 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 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 orders directed
HSBC BANK PLC LONDON (MP6I5ZYZBEU3UXPYFY54)	100.00%	100.00%	N/A	N/A	0.00%

When receiving and executing Client orders, HSBC traders use their best judgment to achieve the optimal balance amongst the following factors:

- Speed - The time between receiving an order and its execution.
- Price - The price of an asset or instrument.
- Costs - All expenses incurred by the client which are directly related to the order execution.
- Likelihood of execution and settlement - The likelihood that the execution venue will be able to complete the client order as per the instructions provided.
- Size of the trade - The size of the trade relative to other trades in the financial instrument.
- Nature of the trade - The particular characteristics of the instrument being traded or the order (eg Limit order).
- Any other consideration which may be relevant to order execution.

As a general rule, when considering the relative importance of these factors, the total consideration paid by our Client will be the most important factor considered by trading desks in achieving best execution. "Total consideration" includes the price of the final instrument and the costs related to execution, including all expenses incurred by our Client which are directly related to the execution. In executing Client orders, the trading desk takes all necessary steps to minimise implicit costs as well as explicit external costs. HSBC also undertakes to make a prior disclosure to its Clients of all its internal costs (see the "Tariff brochure").

There are three categories of costs which trading desks takes into account in evaluating "total consideration":

- Implicit costs: these costs are variable and unknown before a trade. They include the spread, the market impact of a trade, and the opportunity costs of a trade (related to operational constraints, market timing issues, and missed trade costs). These costs depend fundamentally on the trade characteristics, the prevailing market conditions as well as the speed of execution.

- Explicit external costs, which include commissions, fees, taxes, exchange fees, clearing and settlement costs, or any other costs passed onto the Client by intermediaries participating on the transaction; and
- Explicit internal costs, which represent HSBC's remuneration through its commission or spread.

Whilst total consideration is of primary importance in achieving best execution, other factors identified above may also be instrumental in delivering the best possible execution result to the Client. Therefore, in evaluating the relative importance of all factors, HSBC will also take into account:

- the specific nature of the instrument traded;
- the market where such instrument is traded;
- the characteristics of the order relating to the instrument, including the size of the trade relative to other trades in the financial instrument and the need to minimise any possible impact of the order on the market.

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HSBC maintains a process to review and mitigate any instances of conflicts arising through the normal course of business. HSBC ensures that all employees are aware of this process and take reasonable steps to identify conflicts of interest that arise or may arise in the course of providing any regulated activity to a client and which may adversely affect clients' interests.

HSBC does not have any price arrangement with any execution venues. Where trading desk does not trade a particular instrument with a full range of counterparties and use only HSBC Global Banking and Markets ("GB&M") or a third party to execute client orders, HSBC is considered to be in a closed architecture environment. This requires HSBC, on a best efforts basis, to compare the prices obtained from GB&M with an alternative available pricing source (e.g. via Bloomberg or Reuters) for those financial instruments where this information is readily publicly available. Where HSBC believes that the price provided by GB&M or a third party is not competitive or where there is no directly comparable investment (when dealing with simple products/structures), HSBC informs clients on a best efforts basis and where achievable obtain the client's consent before executing the transaction with GB&M or a third party.

There was no change in the list of execution venues compared to previous year.

Trading desk doesn't treat categories of clients differently.

Exceptions to the regular process of order management may be allowed only with respect to illiquid financial instruments and unusually large orders, both of which may need to be "worked" during a given period of time, either in search of available liquidity or to ensure the least impact on market price. HSBC will advise its Clients of this fact prior to working the order.

As a general rule, Client orders are not aggregated and are executed on a timely manner and by order of chronological priority. However, there may be instances where Client orders will be bulked, in particular for orders placed on Client portfolios managed by HSBC on a discretionary basis. In all cases, orders can only be aggregated when:

- i) The characteristics of the orders makes them suitable for aggregation;
- ii) HSBC determines that any such aggregation will not result in any disadvantage to a particular Client; and
- iii) In compliance with HSBC' allocation procedures (as may be applicable).

To avoid concentration of risk in external entities, exposure limits by counterparties were defined and are monitored prior to any trade.

The trader best price selection is potentially limited then by exposure threshold defined by credit risk function.

These limits apply as well to intra-group trades.

HSBC do sample testing of its best execution policy. No breach to date have been detected.

Best Execution Information

Report is a summary of the analysis and conclusion drawn from HSBC Private Bank's (Luxembourg) SA detailed monitoring of the quality of execution obtained on the execution venues where all client orders were executed in 2019.

Class of Instrument: 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 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 orders directed
HSBC PB (Suisse) Geneva (549300LM7URE8RZR5X06)	100.00%	100.00%	N/A	N/A	0.00%

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There was no change in the list of counterparties compared to previous reporting year.

Trading desk doesn't treat categories of clients differently.

Exceptions to the regular process of order management may be allowed only with respect to illiquid financial instruments and unusually large orders, both of which may need to be "worked" during a given period of time, either in search of available liquidity or to ensure the least impact on market price. HSBC will advise its Clients of this fact prior to working the order.

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To avoid concentration of risk in external entities, exposure limits by counterparties were defined and are monitored prior to any trade.

The trader best price selection is potentially limited then by exposure threshold defined by credit risk function.

These limits apply as well to intra-group trades.

HSBC do sample testing of its best execution policy. No breach to date have been detected.

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Class of Instrument: Debt 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 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
UBS AG (BFM8T61CT2L1QCEMIK50)	15.28%	20.42%	17.01%	3.41%	0.00%
NOMURA INTL PLC LONDON (DGQCSV2PHVF7I2743539)	6.80%	3.34%	1.87%	1.46%	0.00%
GOLDMAN SACHS INTL LONDON (W22LROWP2IHZNBB6K528)	6.79%	6.59%	3.01%	3.58%	0.00%
HSBC BANK PLC LONDON (MP6I5ZYZBEU3UXPYFY54)	6.11%	5.53%	1.79%	3.74%	0.00%
MERRILL LYNCH INT LONDON (GGDZP1UYGU9STUHRDP48)	5.66%	4.96%	2.20%	2.77%	0.00%

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HSBC/PBLU does not have any price arrangement with any execution venues.

The list of execution venues listed have change slightly with the new inclusion of Nomura, Goldman Sachs and Merrill Lynch when Citigroup, Morgan Stanley and Barclays have been allocated lower volumes this year. This is the result of our best execution process for specific orders received from our clients during the reporting period.

Trading desk doesn't treat categories of clients differently.

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The trader best price selection is potentially limited then by exposure threshold defined by credit risk function. These limits apply as well to intra-group trades.

HSBC do sample testing of its best execution policy. No breach to date have been detected.

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Class of Instrument: Equities - Shares and Depository Receipts – BAND 1-2

Notification if <1 average trade per business day in the previous year: N

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
HSBC SECURITIES NEW YORK (CYYGQCGNHMHPSMRL3R97)	66.19%	52.58%	3.62%	48.97%	0.00%
HSBC SECURITIES LDN (MP6I5ZYBZEU3UXPYFY54)	32.95%	46.49%	0.21%	46.28%	0.00%
CREDIT SUISSE (SWISS) LTD (549300CWR0W0BCS9Q144)	0.52%	0.10%	0%	0.10%	0.00%
RBC EUROPE LONDON (TXDSU46SXBWIGJ8G8E98)	0.46%	0.52%	0%	0.52%	0.00%
CITIGROUP GLOB MKTS LDN (XKZZ2JZF41MRHTR1V493)	0.19%	0.10%	0%	0.10%	0.00%

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There are three categories of costs which trading desks takes into account in evaluating "total consideration":

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HSBC maintains a process to review and mitigate any instances of conflicts arising through the normal course of business. HSBC ensures that all employees are aware of this process and take reasonable steps to identify conflicts of interest that arise or may arise in the course of providing any regulated activity to a client and which may adversely affect clients' interests.

HSBC/PBLU does not have any price arrangement with any execution venues.

No significant change in the list of execution venues listed when compared to previous reporting period.

Trading desk doesn't treat categories of clients differently.

Exceptions to the regular process of order management may be allowed only with respect to illiquid financial instruments and unusually large orders, both of which may need to be "worked" during a given period of time, either in search of available liquidity or to ensure the least impact on market price. HSBC will advise its Clients of this fact prior to working the order.

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HSBC do sample testing of its best execution policy. No breach to date have been detected.

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Class of Instrument: Equities - Shares and Depository Receipts – BAND 3-4

Notification if <1 average trade per business day in the previous year: N

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
HSBC SECURITIES LDN (MP6I5ZYZBEU3UXPYFY54)	73.87%	71.76%	5.88%	65.88%	0.00%
HSBC SECURITIES NEW YORK (CYYGQCGNHMHPSMRL3R97)	20.60%	27.45%	5.88%	21.57%	0.00%
CITIGROUP GLOBAL MRKT NY (TXDSU46SXBWIGJ8G8E98)	4.11%	0.39%	0.39%	0.00%	0.00%
KEPLER CHEUVREUX PARIS (9695005EOZG9X8IRJD84)	1.42%	0.40%	0.00%	0.40%	0.00%

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HSBC/PBLU does not have any price arrangement with any execution venues.

No significant change in the list of execution venues listed when compared to previous reporting period although the volume allocated to HSBC London versus HSBC New York shows a material increase when compared to previous reporting period

Trading desk doesn't treat categories of clients differently.

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Class of Instrument: Equities - Shares and Depository Receipts – BAND 5-6

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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
HSBC SECURITIES LDN (MP6I5ZYBZEU3UXPYFY54)	56.49%	56.76%	4.19%	52.57%	0.00%
HSBC SECURITIES NEW YORK (CYYGQCGNHMHPSMRL3R97)	43.31%	42.55%	5.41%	37.14%	0.00%
KEPLER CHEUVREUX PARIS (9695005EOZG9X8IRJD84)	0.13%	0.05%	0%	0.05%	0.00%
RBC EUROPE LONDON (TXDSU46SXBWIGJ8G8E98)	0.07%	0.64%	0%	0.64%	0.00%

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HSBC/PBLU does not have any price arrangement with any execution venues.

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The trader best price selection is potentially limited then by exposure threshold defined by credit risk function.

These limits apply as well to intra-group trades.

HSBC do sample testing of its best execution policy. A single breach was detected at the beginning of the year as our counterparty HSBC London confirmed there was an error on their execution price. Such error was corrected and there was no more impact on client's trade. Our counterparty review the case to prevent such occurrence in the future.

Best Execution Information

Report is a summary of the analysis and conclusion drawn from HSBC Private Bank's (Luxembourg) SA detailed monitoring of the quality of execution obtained on the execution venues where all client orders were executed in 2019.

Class of Instrument: Equities - Shares and Depositary Receipts – BAND 5-6 BY DEFAULT

Notification if <1 average trade per business day in the previous year: N

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
HSBC SECURITIES NEW YORK (CYYGQCGNHMHPSMRL3R97)	53.44%	52.63%	46.71%	5.92%	0.00%
HSBC SECURITIES LDN (MP6I5ZYZBEU3UXPYFY54)	46.56%	47.37%	0.66%	46.71%	0.00%

When receiving and executing Client orders, HSBC traders use their best judgment to achieve the optimal balance amongst the following factors:

- Speed - The time between receiving an order and its execution.
- Price - The price of an asset or instrument.
- Costs - All expenses incurred by the client which are directly related to the order execution.
- Likelihood of execution and settlement - The likelihood that the execution venue will be able to complete the client order as per the instructions provided.
- Size of the trade - The size of the trade relative to other trades in the financial instrument.
- Nature of the trade - The particular characteristics of the instrument being traded or the order (eg Limit order).
- Any other consideration which may be relevant to order execution.

As a general rule, when considering the relative importance of these factors, the total consideration paid by our Client will be the most important factor considered by trading desks in achieving best execution. "Total consideration" includes the price of the final instrument and the costs related to execution, including all expenses incurred by our Client which are directly related to the execution. In executing Client orders, the trading desk takes all necessary steps to minimise implicit costs as well as explicit external costs. HSBC also undertakes to make a prior disclosure to its Clients of all its internal costs (see the "Tariff brochure").

There are three categories of costs which trading desks takes into account in evaluating "total consideration":

- Implicit costs: these costs are variable and unknown before a trade. They include the spread, the market impact of a trade, and the opportunity costs of a trade (related to operational constraints, market timing issues, and missed trade costs). These costs depend fundamentally on the trade characteristics, the prevailing market conditions as well as the speed of execution.
- Explicit external costs, which include commissions, fees, taxes, exchange fees, clearing and settlement costs, or any other costs passed onto the Client by intermediaries participating on the transaction; and
- Explicit internal costs, which represent HSBC' remuneration through its commission or spread.

Best Execution Information

Whilst total consideration is of primary importance in achieving best execution, other factors identified above may also be instrumental in delivering the best possible execution result to the Client. Therefore, in evaluating the relative importance of all factors, HSBC will also take into account:

- the specific nature of the instrument traded;
- the market where such instrument is traded;
- the characteristics of the order relating to the instrument, including the size of the trade relative to other trades in the financial instrument and the need to minimise any possible impact of the order on the market.

HSBC maintains a process to review and mitigate any instances of conflicts arising through the normal course of business. HSBC ensures that all employees are aware of this process and take reasonable steps to identify conflicts of interest that arise or may arise in the course of providing any regulated activity to a client and which may adversely affect clients' interests.

HSBC/PBLU does not have any price arrangement with any execution venues.

No significant change in the list of execution venues listed when compared to previous reporting period.

Trading desk doesn't treat categories of clients differently.

Exceptions to the regular process of order management may be allowed only with respect to illiquid financial instruments and unusually large orders, both of which may need to be "worked" during a given period of time, either in search of available liquidity or to ensure the least impact on market price. HSBC will advise its Clients of this fact prior to working the order.

As a general rule, Client orders are not aggregated and are executed on a timely manner and by order of chronological priority. However, there may be instances where Client orders will be bulked, in particular for orders placed on Client portfolios managed by HSBC on a discretionary basis. In all cases, orders can only be aggregated when:

- The characteristics of the orders makes them suitable for aggregation;
- HSBC determines that any such aggregation will not result in any disadvantage to a particular Client; and
- In compliance with HSBC' allocation procedures (as may be applicable).

To avoid concentration of risk in external entities, exposure limits by counterparties were defined and are monitored prior to any trade.

The trader best price selection is potentially limited then by exposure threshold defined by credit risk function.

These limits apply as well to intra-group trades.

HSBC do sample testing of its best execution policy. No breach to date have been detected.

Report is a summary of the analysis and conclusion drawn from HSBC Private Bank's (Luxembourg) SA detailed monitoring of the quality of execution obtained on the execution venues where all client orders were executed in 2019.

Best Execution Information

Class of Instrument: Equity 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 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
HSBC BANK PLC LONDON (MP6I5ZYBZEU3UXPYFY54)	100.00%	100.00%	45.65%	54.35%	0.00%

When receiving and executing Client orders, HSBC traders use their best judgment to achieve the optimal balance amongst the following factors:

- Speed - The time between receiving an order and its execution.
- Price - The price of an asset or instrument.
- Costs - All expenses incurred by the client which are directly related to the order execution.
- Likelihood of execution and settlement - The likelihood that the execution venue will be able to complete the client order as per the instructions provided.
- Size of the trade - The size of the trade relative to other trades in the financial instrument.
- Nature of the trade - The particular characteristics of the instrument being traded or the order (eg Limit order).
- Any other consideration which may be relevant to order execution.

As a general rule, when considering the relative importance of these factors, the total consideration paid by our Client will be the most important factor considered by trading desks in achieving best execution. "Total consideration" includes the price of the final instrument and the costs related to execution, including all expenses incurred by our Client which are directly related to the execution. In executing Client orders, the trading desk takes all necessary steps to minimise implicit costs as well as explicit external costs. HSBC also undertakes to make a prior disclosure to its Clients of all its internal costs (see the "Tariff brochure").

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- Explicit external costs, which include commissions, fees, taxes, exchange fees, clearing and settlement costs, or any other costs passed onto the Client by intermediaries participating on the transaction; and
- Explicit internal costs, which represent HSBC' remuneration through its commission or spread.

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- the specific nature of the instrument traded;
- the market where such instrument is traded;
- the characteristics of the order relating to the instrument, including the size of the trade relative to other trades in the financial instrument and the need to minimise any possible impact of the order on the market.

HSBC maintains a process to review and mitigate any instances of conflicts arising through the normal course of business. HSBC ensures that all employees are aware of this process and take reasonable steps to identify conflicts

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of interest that arise or may arise in the course of providing any regulated activity to a client and which may adversely affect clients' interests.

HSBC does not have any price arrangement with any execution venues. Where trading desk does not trade a particular instrument with a full range of counterparties and use only HSBC Global Banking and Markets ("GB&M") or a third party to execute client orders, HSBC is considered to be in a closed architecture environment. This requires HSBC, on a best efforts basis, to compare the prices obtained from GB&M with an alternative available pricing source (e.g. via Bloomberg or Reuters) for those financial instruments where this information is readily publicly available.

Where HSBC believes that the price provided by GB&M or a third party is not competitive or where there is no directly comparable investment (when dealing with simple products/structures), HSBC informs clients on a best efforts basis and where achievable obtain the client's consent before executing the transaction with GB&M or a third party.

No change in the list of execution venues listed when compared to previous reporting period.

Trading desk doesn't treat categories of clients differently.

Exceptions to the regular process of order management may be allowed only with respect to illiquid financial instruments and unusually large orders, both of which may need to be "worked" during a given period of time, either in search of available liquidity or to ensure the least impact on market price. HSBC will advise its Clients of this fact prior to working the order.

As a general rule, Client orders are not aggregated and are executed on a timely manner and by order of chronological priority. However, there may be instances where Client orders will be bulked, in particular for orders placed on Client portfolios managed by HSBC on a discretionary basis. In all cases, orders can only be aggregated when:

- i) The characteristics of the orders makes them suitable for aggregation;
- ii) HSBC determines that any such aggregation will not result in any disadvantage to a particular Client; and
- iii) In compliance with HSBC' allocation procedures (as may be applicable).

To avoid concentration of risk in external entities, exposure limits by counterparties were defined and are monitored prior to any trade.

The trader best price selection is potentially limited then by exposure threshold defined by credit risk function. These limits apply as well to intra-group trades.

HSBC do sample testing of its best execution policy. No breach to date have been detected.

Best Execution Information

Report is a summary of the analysis and conclusion drawn from HSBC Private Bank's (Luxembourg) SA detailed monitoring of the quality of execution obtained on the execution venues where all client orders were executed in 2019.

Class of Instrument: Exchange Traded Products – BAND 3-4

Notification if <1 average trade per business day in the previous year: N

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 orders directed
HSBC SECURITIES LDN (MP6I5ZYZBEU3UXPYFY54)	100%	100%	93.75%	6.25%	0.00%

When receiving and executing Client orders, HSBC traders use their best judgment to achieve the optimal balance amongst the following factors:

- Speed - The time between receiving an order and its execution.
- Price - The price of an asset or instrument.
- Costs - All expenses incurred by the client which are directly related to the order execution.
- Likelihood of execution and settlement - The likelihood that the execution venue will be able to complete the client order as per the instructions provided.
- Size of the trade - The size of the trade relative to other trades in the financial instrument.
- Nature of the trade - The particular characteristics of the instrument being traded or the order (eg Limit order).
- Any other consideration which may be relevant to order execution.

As a general rule, when considering the relative importance of these factors, the total consideration paid by our Client will be the most important factor considered by trading desks in achieving best execution. "Total consideration" includes the price of the final instrument and the costs related to execution, including all expenses incurred by our Client which are directly related to the execution. In executing Client orders, the trading desk takes all necessary steps to minimise implicit costs as well as explicit external costs. HSBC also undertakes to make a prior disclosure to its Clients of all its internal costs (see the "Tariff brochure").

There are three categories of costs which trading desks takes into account in evaluating "total consideration":

- Implicit costs: these costs are variable and unknown before a trade. They include the spread, the market impact of a trade, and the opportunity costs of a trade (related to operational constraints, market timing issues, and missed trade costs). These costs depend fundamentally on the trade characteristics, the prevailing market conditions as well as the speed of execution.
- Explicit external costs, which include commissions, fees, taxes, exchange fees, clearing and settlement costs, or any other costs passed onto the Client by intermediaries participating on the transaction; and
- Explicit internal costs, which represent HSBC's remuneration through its commission or spread.

Whilst total consideration is of primary importance in achieving best execution, other factors identified above may also be instrumental in delivering the best possible execution result to the Client. Therefore, in evaluating the relative importance of all factors, HSBC will also take into account:

- the specific nature of the instrument traded;
- the market where such instrument is traded;
- the characteristics of the order relating to the instrument, including the size of the trade relative to other trades in the financial instrument and the need to minimise any possible impact of the order on the market.

Best Execution Information

HSBC does not have any price arrangement with any execution venues. Where trading desk does not trade a particular instrument with a full range of counterparties and use only HSBC Global Banking and Markets ("GB&M") or a third party to execute client orders, HSBC is considered to be in a closed architecture environment. This requires HSBC, on a best efforts basis, to compare the prices obtained from GB&M with an alternative available pricing source (e.g. via Bloomberg or Reuters) for those financial instruments where this information is readily publicly available.

Where HSBC believes that the price provided by GB&M or a third party is not competitive or where there is no directly comparable investment (when dealing with simple products/structures), HSBC informs clients on a best efforts basis and where achievable obtain the client's consent before executing the transaction with GB&M or a third party. HSBC maintains a process to review and mitigate any instances of conflicts arising through the normal course of business. HSBC ensures that all employees are aware of this process and take reasonable steps to identify conflicts of interest that arise or may arise in the course of providing any regulated activity to a client and which may adversely affect clients' interests.

The list of execution venues listed when compared to previous reporting period shows a total allocation to HSBC London. This is only due to the type of asset involved and traded on London Stock Exchange only.

Trading desk doesn't treat categories of clients differently.

Exceptions to the regular process of order management may be allowed only with respect to illiquid financial instruments and unusually large orders, both of which may need to be "worked" during a given period of time, either in search of available liquidity or to ensure the least impact on market price. HSBC will advise its Clients of this fact prior to working the order.

As a general rule, Client orders are not aggregated and are executed on a timely manner and by order of chronological priority. However, there may be instances where Client orders will be bulked, in particular for orders placed on Client portfolios managed by HSBC on a discretionary basis. In all cases, orders can only be aggregated when:

- i) The characteristics of the orders makes them suitable for aggregation;
- ii) HSBC determines that any such aggregation will not result in any disadvantage to a particular Client; and
- iii) In compliance with HSBC' allocation procedures (as may be applicable).

To avoid concentration of risk in external entities, exposure limits by counterparties were defined and are monitored prior to any trade.

The trader best price selection is potentially limited then by exposure threshold defined by credit risk function. These limits apply as well to intra-group trades.

HSBC do sample testing of its best execution policy. No breach to date have been detected.

Best Execution Information

Report is a summary of the analysis and conclusion drawn from HSBC Private Bank's (Luxembourg) SA detailed monitoring of the quality of execution obtained on the execution venues where all client orders were executed in 2019.

Class of Instrument: Exchange Traded Products – BANK 5-6

Notification if <1 average trade per business day in the previous year: N

Top five execution venues ranked in terms of trading volumes (descending 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
HSBC SECURITIES LDN (MP6I5ZYZBEU3UXPYFY54)	47.66%	77.51%	1.22%	76.29%	00.00%
HSBC SECURITIES NEW YORK (CYYGQCGNHMHPSMRL3R97)	38.18%	20.84%	0.35%	20.49%	00.00%
CITIGROUP GLOBAL MARKET (XKZZ2JZF41MRHTR1V493)	8.66%	0.70%	0%	0.70%	00.00%
KEPLER CHEUVREUX PARIS (9695005EOZG9X8IRJD84)	3.33%	0.70%	0.09%	0.61%	00.00%
CSFB EUROPE LONDON (DL6FFRRLF74S01HE2M14)	2.17%	0.26%	0%	0.26%	00.00%

When receiving and executing Client orders, HSBC traders use their best judgment to achieve the optimal balance amongst the following factors:

- Speed - The time between receiving an order and its execution.
- Price - The price of an asset or instrument.
- Costs - All expenses incurred by the client which are directly related to the order execution.
- Likelihood of execution and settlement - The likelihood that the execution venue will be able to complete the client order as per the instructions provided.
- Size of the trade - The size of the trade relative to other trades in the financial instrument.
- Nature of the trade - The particular characteristics of the instrument being traded or the order (eg Limit order).
- Any other consideration which may be relevant to order execution.

As a general rule, when considering the relative importance of these factors, the total consideration paid by our Client will be the most important factor considered by trading desks in achieving best execution. "Total consideration" includes the price of the final instrument and the costs related to execution, including all expenses incurred by our Client which are directly related to the execution. In executing Client orders, the trading desk takes all necessary steps to minimise implicit costs as well as explicit external costs. HSBC also undertakes to make a prior disclosure to its Clients of all its internal costs (see the "Tariff brochure").

There are three categories of costs which trading desks takes into account in evaluating "total consideration":

- Implicit costs: these costs are variable and unknown before a trade. They include the spread, the market impact of a trade, and the opportunity costs of a trade (related to operational constraints, market timing issues, and missed

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trade costs). These costs depend fundamentally on the trade characteristics, the prevailing market conditions as well as the speed of execution.

- Explicit external costs, which include commissions, fees, taxes, exchange fees, clearing and settlement costs, or any other costs passed onto the Client by intermediaries participating on the transaction; and
- Explicit internal costs, which represent HSBC' remuneration through its commission or spread.

Whilst total consideration is of primary importance in achieving best execution, other factors identified above may also be instrumental in delivering the best possible execution result to the Client. Therefore, in evaluating the relative importance of all factors, HSBC will also take into account:

- the specific nature of the instrument traded;
- the market where such instrument is traded;
- the characteristics of the order relating to the instrument, including the size of the trade relative to other trades in the financial instrument and the need to minimise any possible impact of the order on the market.

HSBC maintains a process to review and mitigate any instances of conflicts arising through the normal course of business. HSBC ensures that all employees are aware of this process and take reasonable steps to identify conflicts of interest that arise or may arise in the course of providing any regulated activity to a client and which may adversely affect clients' interests.

HSBC/PBLU does not have any price arrangement with any execution venues.

No significant change in the list of execution venues listed when compared to previous reporting period.

Trading desk doesn't treat categories of clients differently.

Exceptions to the regular process of order management may be allowed only with respect to illiquid financial instruments and unusually large orders, both of which may need to be "worked" during a given period of time, either in search of available liquidity or to ensure the least impact on market price. HSBC will advise its Clients of this fact prior to working the order.

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- i) The characteristics of the orders makes them suitable for aggregation;
- ii) HSBC determines that any such aggregation will not result in any disadvantage to a particular Client; and
- iii) In compliance with HSBC' allocation procedures (as may be applicable).

To avoid concentration of risk in external entities, exposure limits by counterparties were defined and are monitored prior to any trade.

The trader best price selection is potentially limited then by exposure threshold defined by credit risk function.

These limits apply as well to intra-group trades.

HSBC do sample testing of its best execution policy. No breach to date have been detected.

Best Execution Information

Report is a summary of the analysis and conclusion drawn from HSBC Private Bank's (Luxembourg) SA detailed monitoring of the quality of execution obtained on the execution venues where all client orders were executed in 2019.

Class of Instrument: Exchange Traded Products – BANK 5-6 BY DEFAULT

Notification if <1 average trade per business day in the previous year: N

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
HSBC SECURITIES LDN (MP6I5ZYZBEU3UXPYFY54)	51.67%	67.16%	0.29%	66.86%	00.00%
HSBC SECURITIES NEW YORK (CYYGQCGNHMHPSMRL3R97)	26.99%	27.57%	0%	27.57%	00.00%
KEPLER CHEUVREUX PARIS (9695005EOZG9X8IRJD84)	8.32%	1.17%	0%	1.17%	00.00%
CITIGROUP GLOBAL MARKET (XKZZ2JZF41MRHTR1V493)	7.40%	2.64%	0%	2.64%	00.00%
CSFB EUROPE LONDON (DL6FFRRLF74S01HE2M14)	5.47%	0.84%	0%	0.88%	00.00%

When receiving and executing Client orders, HSBC traders use their best judgment to achieve the optimal balance amongst the following factors:

- Speed - The time between receiving an order and its execution.
- Price - The price of an asset or instrument.
- Costs - All expenses incurred by the client which are directly related to the order execution.
- Likelihood of execution and settlement - The likelihood that the execution venue will be able to complete the client order as per the instructions provided.
- Size of the trade - The size of the trade relative to other trades in the financial instrument.
- Nature of the trade - The particular characteristics of the instrument being traded or the order (eg Limit order).
- Any other consideration which may be relevant to order execution.

As a general rule, when considering the relative importance of these factors, the total consideration paid by our Client will be the most important factor considered by trading desks in achieving best execution. "Total consideration" includes the price of the final instrument and the costs related to execution, including all expenses incurred by our Client which are directly related to the execution. In executing Client orders, the trading desk takes all necessary steps to minimise implicit costs as well as explicit external costs. HSBC also undertakes to make a prior disclosure to its Clients of all its internal costs (see the "Tariff brochure").

There are three categories of costs which trading desks takes into account in evaluating "total consideration":

- Implicit costs: these costs are variable and unknown before a trade. They include the spread, the market impact of a trade, and the opportunity costs of a trade (related to operational constraints, market timing issues, and missed

Best Execution Information

trade costs). These costs depend fundamentally on the trade characteristics, the prevailing market conditions as well as the speed of execution.

- Explicit external costs, which include commissions, fees, taxes, exchange fees, clearing and settlement costs, or any other costs passed onto the Client by intermediaries participating on the transaction; and
- Explicit internal costs, which represent HSBC' remuneration through its commission or spread.

Whilst total consideration is of primary importance in achieving best execution, other factors identified above may also be instrumental in delivering the best possible execution result to the Client. Therefore, in evaluating the relative importance of all factors, HSBC will also take into account:

- the specific nature of the instrument traded;
- the market where such instrument is traded;
- the characteristics of the order relating to the instrument, including the size of the trade relative to other trades in the financial instrument and the need to minimise any possible impact of the order on the market.

HSBC maintains a process to review and mitigate any instances of conflicts arising through the normal course of business. HSBC ensures that all employees are aware of this process and take reasonable steps to identify conflicts of interest that arise or may arise in the course of providing any regulated activity to a client and which may adversely affect clients' interests.

HSBC/PBLU does not have any price arrangement with any execution venues.

No significant change in the list of execution venues listed when compared to previous reporting period.

Trading desk doesn't treat categories of clients differently.

Exceptions to the regular process of order management may be allowed only with respect to illiquid financial instruments and unusually large orders, both of which may need to be "worked" during a given period of time, either in search of available liquidity or to ensure the least impact on market price. HSBC will advise its Clients of this fact prior to working the order.

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- i) The characteristics of the orders makes them suitable for aggregation;
- ii) HSBC determines that any such aggregation will not result in any disadvantage to a particular Client; and
- iii) In compliance with HSBC' allocation procedures (as may be applicable).

To avoid concentration of risk in external entities, exposure limits by counterparties were defined and are monitored prior to any trade.

The trader best price selection is potentially limited then by exposure threshold defined by credit risk function.

These limits apply as well to intra-group trades.

HSBC do sample testing of its best execution policy. No breach to date have been detected.

Best Execution Information

Report is a summary of the analysis and conclusion drawn from HSBC Private Bank's (Luxembourg) SA detailed monitoring of the quality of execution obtained on the execution venues where all client orders were executed in 2019.

Class of Instrument: Securitized 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 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 orders directed
HSBC BANK PLC LONDON (MP6I5ZYZBEU3UXPYFY54)	37.13%	38.89%	1.85%	37.04%	00.00%
SOCIETE GENERALE PARIS (O2RNE8IBXP4R0TD8PU41)	24.63%	14.81%	0%	14.81%	00.00%
VONTOBEL ZURICH (549300L7V4MGECYRM576)	14.05%	27.78%	27.78%	0%	00.00%
BNP PARIS SA PARIS (R0MUWSFPU8MPRO8K5P83)	10.23%	5.56%	0%	5.56%	00.00%
CREDIT AGRICOLE CORP PARIS (1VUV7VQFKUOQSJ21A208)	5.31%	1.85%	0%	1.85%	00.00%

When receiving and executing Client orders, HSBC traders use their best judgment to achieve the optimal balance amongst the following factors:

- Speed - The time between receiving an order and its execution.
- Price - The price of an asset or instrument.
- Costs - All expenses incurred by the client which are directly related to the order execution.
- Likelihood of execution and settlement - The likelihood that the execution venue will be able to complete the client order as per the instructions provided.
- Size of the trade - The size of the trade relative to other trades in the financial instrument.
- Nature of the trade - The particular characteristics of the instrument being traded or the order (eg Limit order).
- Any other consideration which may be relevant to order execution.

As a general rule, when considering the relative importance of these factors, the total consideration paid by our Client will be the most important factor considered by trading desks in achieving best execution. "Total consideration" includes the price of the final instrument and the costs related to execution, including all expenses incurred by our Client which are directly related to the execution. In executing Client orders, the trading desk takes all necessary steps to minimise implicit costs as well as explicit external costs. HSBC also undertakes to make a prior disclosure to its Clients of all its internal costs (see the "Tariff brochure").

There are three categories of costs which trading desks takes into account in evaluating "total consideration":

- Implicit costs: these costs are variable and unknown before a trade. They include the spread, the market impact of a trade, and the opportunity costs of a trade (related to operational constraints, market timing issues, and missed

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trade costs). These costs depend fundamentally on the trade characteristics, the prevailing market conditions as well as the speed of execution.

- Explicit external costs, which include commissions, fees, taxes, exchange fees, clearing and settlement costs, or any other costs passed onto the Client by intermediaries participating on the transaction; and
- Explicit internal costs, which represent HSBC' remuneration through its commission or spread.

Whilst total consideration is of primary importance in achieving best execution, other factors identified above may also be instrumental in delivering the best possible execution result to the Client. Therefore, in evaluating the relative importance of all factors, HSBC will also take into account:

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- the market where such instrument is traded;
- the characteristics of the order relating to the instrument, including the size of the trade relative to other trades in the financial instrument and the need to minimise any possible impact of the order on the market.

HSBC maintains a process to review and mitigate any instances of conflicts arising through the normal course of business. HSBC ensures that all employees are aware of this process and take reasonable steps to identify conflicts of interest that arise or may arise in the course of providing any regulated activity to a client and which may adversely affect clients' interests.

HSBC/PBLU does not have any price arrangement with any execution venues.

No significant change in the list of execution venues listed when compared to previous reporting period except for an increased allocation to Vontobel due to the type of structured product sourced by this counterparty and our client were willing to invest in.

Trading desk doesn't treat categories of clients differently.

Exceptions to the regular process of order management may be allowed only with respect to illiquid financial instruments and unusually large orders, both of which may need to be "worked" during a given period of time, either in search of available liquidity or to ensure the least impact on market price. HSBC will advise its Clients of this fact prior to working the order.

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To avoid concentration of risk in external entities, exposure limits by counterparties were defined and are monitored prior to any trade.

The trader best price selection is potentially limited then by exposure threshold defined by credit risk function. These limits apply as well to intra-group trades.

HSBC do sample testing of its best execution policy. No breach to date have been detected.

Best Execution Information

Report is a summary of the analysis and conclusion drawn from HSBC Private Bank's (Luxembourg) SA detailed monitoring of the quality of execution obtained on the execution venues where all client orders were executed in 2019.

Class of Instrument: Other 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 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 orders directed
HSBC SECURITIES LUX (213800OPVOQIR4OADG59)	45.96%	22.18%	N/A	N/A	00.00%
EUROCLEAR BANK SA / NV (549300OZ46BRLZ8Y6F65)	45.29%	65.15%	N/A	N/A	00.00%
MAITLAND LUXEMBOURG ()	4.95%	2.63%	N/A	N/A	00.00%
HSBC PB (Suisse) Geneva (549300LM7URE8RZR5X06)	3.16%	9.05%	N/A	N/A	00.00%
HSBC S.S. (IRELAND) LTD (213800HVF4H4GD6WSK83)	0.23%	0.33%	N/A	N/A	00.00%

When receiving and executing Client orders, HSBC traders use their best judgment to achieve the optimal balance amongst the following factors:

- Speed - The time between receiving an order and its execution.
- Price - The price of an asset or instrument.
- Costs - All expenses incurred by the client which are directly related to the order execution.
- Likelihood of execution and settlement - The likelihood that the execution venue will be able to complete the client order as per the instructions provided.
- Size of the trade - The size of the trade relative to other trades in the financial instrument.
- Nature of the trade - The particular characteristics of the instrument being traded or the order (eg Limit order).
- Any other consideration which may be relevant to order execution.

As a general rule, when considering the relative importance of these factors, the total consideration paid by our Client will be the most important factor considered by trading desks in achieving best execution. "Total consideration" includes the price of the final instrument and the costs related to execution, including all expenses incurred by our Client which are directly related to the execution. In executing Client orders, the trading desk takes all necessary steps to minimise implicit costs as well as explicit external costs. HSBC also undertakes to make a prior disclosure to its Clients of all its internal costs (see the "Tariff brochure").

There are three categories of costs which trading desks takes into account in evaluating "total consideration":

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- Implicit costs: these costs are variable and unknown before a trade. They include the spread, the market impact of a trade, and the opportunity costs of a trade (related to operational constraints, market timing issues, and missed trade costs). These costs depend fundamentally on the trade characteristics, the prevailing market conditions as well as the speed of execution.

- Explicit external costs, which include commissions, fees, taxes, exchange fees, clearing and settlement costs, or any other costs passed onto the Client by intermediaries participating on the transaction; and

- Explicit internal costs, which represent HSBC' remuneration through its commission or spread.

Whilst total consideration is of primary importance in achieving best execution, other factors identified above may also be instrumental in delivering the best possible execution result to the Client. Therefore, in evaluating the relative importance of all factors, HSBC will also take into account:

- the specific nature of the instrument traded;

- the market where such instrument is traded;

- the characteristics of the order relating to the instrument, including the size of the trade relative to other trades in the financial instrument and the need to minimise any possible impact of the order on the market.

HSBC maintains a process to review and mitigate any instances of conflicts arising through the normal course of business. HSBC ensures that all employees are aware of this process and take reasonable steps to identify conflicts of interest that arise or may arise in the course of providing any regulated activity to a client and which may adversely affect clients' interests.

HSBC/PBLU does not have any price arrangement with any execution venues.

No significant change in the list of execution venues listed when compared to previous reporting period.

Trading desk doesn't treat categories of clients differently.

Exceptions to the regular process of order management may be allowed only with respect to illiquid financial instruments and unusually large orders, both of which may need to be "worked" during a given period of time, either in search of available liquidity or to ensure the least impact on market price. HSBC will advise its Clients of this fact prior to working the order.

As a general rule, Client orders are not aggregated and are executed on a timely manner and by order of chronological priority. However, there may be instances where Client orders will be bulked, in particular for orders placed on Client portfolios managed by HSBC on a discretionary basis. In all cases, orders can only be aggregated when:

i) The characteristics of the orders makes them suitable for aggregation;

ii) HSBC determines that any such aggregation will not result in any disadvantage to a particular Client; and

iii) In compliance with HSBC' allocation procedures (as may be applicable).

To avoid concentration of risk in external entities, exposure limits by counterparties were defined and are monitored prior to any trade.

The trader best price selection is potentially limited then by exposure threshold defined by credit risk function.

These limits apply as well to intra-group trades.

HSBC do sample testing of its best execution policy. No breach to date have been detected.



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We are a member of the HSBC Group, one of the world's largest banking and financial service organisations.

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