

Form of RTS 28 Annual Report on Best Execution for Shinkin International Limited, LEI: 213800C183NFVG587E43

Published March 2020 for the period 1 January to 31 December 2019

Purpose

This report is published annually by MiFID II investment firms and sets out information on the identity of execution venues and the quality of execution. Its purpose is to enable clients to evaluate the quality of SIL's execution practices and to identify the top five execution venues by trading volume. The report has been prepared by Shinkin International Limited (SIL) for the purposes of EU Commission Delegated Regulation (EU) 2017/576 (RTS 28) which supplements EU Directive 2014/65/EU (MiFID II)

The numbered headings reflect the Article 3 requirements of RTS 28.

3. Activities in Scope

We set out below the top 5 venues and brokers (where applicable) for client orders in financial instruments by instrument type. Note that for bonds and medium term note transactions SIL transacts directly with the relevant client and not through a venue.

SIL transacts with professional clients and eligible counterparties.

Top 5 venues by class of financial instrument (Professional clients)					
Class of Instrument		Bonds (medium term notes and private placement)			
Confirmation if <1 average trade per business day in previous year		Yes			
Top five venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total executed volume	Number of orders executed as percentage of total orders executed	Percentage of Passive orders	Percentage of Aggressive orders	Percentage of Directed orders
N/A					
SIL provides comprehensive reporting and full transparency on all aspects of each medium term note traded with the client. All orders are reverse inquiry from the client to SIL.					

Top 5 venues by class of financial instrument (Professional clients)					
Class of Instrument		Bonds (non private placement)			
Confirmation if <1 average trade per business day in previous year		Yes			
Top five venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total executed volume	Number of orders executed as percentage of total orders executed	Percentage of Passive orders	Percentage of Aggressive orders	Percentage of Directed orders
N/A					
SIL provides comprehensive reporting and full transparency on all aspects of each medium term note traded with the client. All orders are reverse inquiry from the client to SIL.					

Qualitative Analysis

3(a) Assessing execution and qualitative factors for 'Best Execution'

SIL sets out 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. Please also refer to SIL's Best Execution Policy.

SIL takes into account a range of different factors (the 'Execution Factors') in deciding how to execute an order, including:

- price;
- the cost of execution;
- timing and speed of execution;
- creditworthiness and financial stability;
- the execution venue;
- the likelihood of executing and settling the order (including the fill rate);
- the size of the order;
- the characteristics of the financial instrument including whether it is executed on a regulated market, multi-lateral trading facility (MTF), organised trading facilities (OTF) or over-the-counter (OTC);
- the market impact of the order;
- the characteristics of the execution venue to be used in respect of that financial instrument
- any other factors that may be relevant to the execution of the order

For the medium notes and bonds SIL is the sole entity instructed to execute the transactions for the client.

Subject to any express instructions, SIL will exercise its discretion as the relative importance of the Execution Factors in the best interests of the client. SIL works closely with its clients to ensure that it balances the factors with the desired outcomes and purpose of the transaction. Generally, the highest priority is placed on price. Other factors may also be prioritised by the client or SIL, in the best interests of the client, such as the impact of market prices, speed and likelihood of execution and settlement.

3(b) Close links and Common ownership

SIL has no close links with any execution venues or brokers used for execution of client orders.

3(c) – (h) Conflicts of Interest Questions

- (c) Provide a description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received.

N/A

- (d) Provide 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

N/A

- (e) Provide 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

SIL has professional clients and eligible counterparties and treats them the same for order execution purpose.

- (f) Provide 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

N/A

- (g) Provide 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) 2017/575 (RTS 27)

N/A

- (h) Provide an explanation of how the investment firm has used output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU

N/A