

Appendix - Goodbody Stockbrokers

RTS 28 Report 2022

We note below the information required to be provided under Article 3(3) of RTS 28 providing a summary of the analysis and conclusions drawn from Goodbody Stockbrokers detailed monitoring of the quality of execution obtained on the execution venues where we have executed all client orders in the previous year (2020).

Requirement under Article 3(3)	
<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>The importance of the various execution factors stipulated by the rules will vary depending on the circumstances and context of the order.</p> <p>Where we execute an order, we will take all reasonable steps to obtain the best possible result for that transaction, taking into account any specific instructions, the price, costs, speed, likelihood of execution and settlement, size, nature or any other consideration that may be relevant to the execution or placing of that order.</p> <p>Further information can be obtained in the relevant Goodbody Order Execution Policy.</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>Goodbody does not have any close links, conflicts of interests or common ownerships with respect to any execution venues used to execute orders.</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>Goodbody does not have any arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received.</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>There were no material changes to our list of execution venues. This list can be accessed via our public website.</p> <p>Execution venues and partners on our list of execution venues are subject to an authorisation and ongoing monitoring process, which includes, periodic reviews of the performance of execution services.</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>Goodbody has three order execution policies each of which is tailored to the clients of a specific business unit. These business units are:</p> <ul style="list-style-type: none"> • Goodbody Wealth Management • Goodbody Capital Markets • Goodbody Asset Management <p>Further information can be obtained in the relevant Goodbody Order Execution Policy.</p>
<p>(f) an explanation of whether other criteria were given precedence over immediate price and cost when executing</p>	<p>Best execution for retail clients is determined on the basis of total consideration. Goodbody did not deviate from using the primary criteria of immediate price and cost when determining best execution.</p>

<p>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>(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 Delegated Regulation (EU) 2017/575 [RTS 27];</p>	<p>During 2021, Goodbody has regularly monitored the quality of execution obtained from the execution venues used to place client orders for execution.</p> <p>Goodbody is satisfied that it has adhered to the requirements set out in its execution policies in seeking to obtain best execution for its clients by reference to all relevant factors.</p> <p>Each trade is monitored by the executing trader when placing the trade instruction to ensure that it is executed on the best terms available.</p> <p>Executions are monitored on an ongoing basis against the relative benchmark by the relative trader/sales trader. Further to this, the compliance department monitor all orders for execution quality on a regular basis.</p>
<p>(h) where applicable, an explanation of how the investment firm has used output of a consolidated tape provider.</p>	<p>This is not applicable, as there are currently no consolidated tape providers in Europe.</p>

Professional Clients – 2021

Professional Clients						
Class of Instrument		Equities - Tick size liquidity band 1 and 2 (from 0 to 79 trades per day)				
Notification if <1 average trade per business day in the previous year (Y/N)		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
Name	LEI / MIC:					
London Stock Exchange-SETSMM	XLON	64.50%	66.30%	5.42%	22.26%	0.00%
London Stock Exchange-SETS	XLON	32.04%	17.43%	3.97%	30.88%	0.00%
Irish Stock Exchange - MAIN	XMSM	2.47%	10.19%	1.16%	3.31%	0.00%
London Stock Exchange-AIM	XLON	1.00%	6.09%	1.11%	0.28%	0.00%
Professional Clients						
Class of Instrument		Equities - Tick size liquidity bands 3 and 4 (from 80 to 1999 trades per day)				
Notification if <1 average trade per business day in the previous year (Y/N)		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
Name	LEI / MIC:					
Irish Stock Exchange - MAIN	XMSM	60.38%	43.04%	25.20%	9.60%	0.00%
London Stock Exchange-SETSMM	XLON	35.33%	50.12%	3.42%	11.18%	0.00%
London Stock Exchange-SETS	XLON	4.29%	6.69%	1.81%	3.97%	0.00%
London Stock Exchange-AIM	XLON	0.00%	0.14%	0.00%	0.00%	0.00%
Professional Clients						
Class of Instrument		Equities - Tick size liquidity bands 5 and 6 (from 2000 trades per day)				
Notification if <1 average trade per business day in the previous year (Y/N)		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
Name	LEI / MIC:					
Irish Stock Exchange - MAIN	XMSM	56.35%	46.16%	22.80%	11.47%	0.00%
London Stock Exchange-SETS	XLON	26.35%	27.22%	4.35%	16.73%	0.00%
London Stock Exchange-SETSMM	XLON	14.83%	26.53%	6.01%	38.29%	0.00%
Boerse Frankfurt	XFRA	2.48%	0.07%	12.50%	50.00%	0.00%
Euronext Amsterdam	XAMS	0.00%	0.01%	0.00%	0.00%	0.00%

Retail Clients – 2021

Retail Clients						
Class of Instrument		Equities - Shares & Depository Receipts				
Notification if <1 average trade per business day in the previous year (Y/N)		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
Name	LEI / MIC:					
COWEN AND COMPANY, LLC	549300WR155U7DVMIW58	19.8%	1.2%	0.00%	0.00%	0.00%
SOCIETE GENERALE	O2RNE8IBXP4R0TD8PU41	14.9%	0.0%	0.00%	0.00%	0.00%
Irish Stock Exchange	XMSM	12.7%	9.8%	0.00%	0.00%	0.00%
London Stock Exchange	XLON	7.6%	2.6%	0.00%	0.00%	0.00%
BNP PARIBAS ARBITRAGE	ROMUWSFPU8MPRO8K5P83	5.8%	0.0%	0.00%	0.00%	0.00%
Retail Clients						
Class of Instrument		Debt Instruments				
Notification if <1 average trade per business day in the previous year (Y/N)		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
Name	LEI / MIC:					
Bloomberg	BMTF	30%	23%	0.00%	0.00%	0.00%
BNP PARIBAS ARBITRAGE	ROMUWSFPU8MPRO8K5P83	17%	1%	0.00%	0.00%	0.00%
Natwest Markets	RR3QWICWWIPCS8A4S074	12%	19%	0.00%	0.00%	0.00%
RBC Europe Limited	TXDSU46SXBWIGJ8G8E98	10%	10%	0.00%	0.00%	0.00%
BANCO SANTANDER SA	5493006QMFDDMYWIAM13	6%	7%	0.00%	0.00%	0.00%
Retail Clients						
Class of Instrument		Exchange Traded Products				
Notification if <1 average trade per business day in the previous year (Y/N)		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
Name	LEI / MIC:					
Virtu ITG Europe Limited	213800EEC95PRUCEUP63	19%	11%	0.00%	0.00%	0.00%
Flow Traders	549300CLJI9XDH12XV51	13%	3%	0.00%	0.00%	0.00%
JEFFERIES INTERNATIONAL LTD	S5THZMDUJCTQZBTRV198	13%	3%	0.00%	0.00%	0.00%
COWEN AND COMPANY, LLC	549300WR155U7DVMIW58	13%	4%	0.00%	0.00%	0.00%
Cannacord Genuity Ltd	ZBU7VFV5NIMN4ILRFC23	9%	16%	0.00%	0.00%	0.00%