

Quality of Execution Report

Currency Derivatives – Swaps, forwards and other currency derivatives

Period covering 1 January 2019 – 31 December 2019

Investment Service - Portfolio Management/Reception and Transmission Professional Clients

Class of Instrument	Currency derivatives - Swaps, forwards, and other 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 Directed orders
CITIBANK NA - E57ODZWZ7FF32TWEFA76	23.81	23.09	100.00	0.00	0.00
JPMORGAN CHASE BANK NA - 7H6GLXDRUGQFU57RNE97	21.65	25.67	100.00	0.00	0.00
STANDARD CHARTERED BANK LONDON - RILFO74KP1CM8P6PCT96	11.41	10.89	100.00	0.00	0.00
HSBC BANK PLC - MP6I5ZYZBEU3UXPYFY54	10.16	7.54	100.00	0.00	0.00
GOLDMAN SACHS INTERNATIONAL - W22LROWP2IHZNBB6K528	8.14	15.03	100.00	0.00	0.00

Note:

- The reporting period covered is from 1 January 2019 to 31 December 2019
- Class of Instrument (Currency Derivatives - Swaps, forwards and other currency derivatives contains currency swaps, FX forwards, and FX transactions booked as part of a currency swap
- Notification of < 1 average trade per business day in the previous year is indicated with 'N' for 'No' where there was less than 1 trade on average per business day in 2018.

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Portfolio Management / Reception and Transmission

Neuberger Berman Asset Management Ireland Limited (NBAMIL) has published for each class of financial instrument, that it has either traded in or placed with a counterparty for execution, a summary of its analysis and the conclusions drawn from detailed monitoring of the quality of execution obtained for all client orders during 2019. [This trading activity was previously reported within the NBEL \(Neuberger Berman Europe Limited\) entity reports. Following a transfer in Q4 2019 of several branch offices from NBEL to NBAMIL this trading activity is now split into a separate NBAMIL report. Report covers executions for the period of September 2nd 2019 to December 31st 2019.](#)

The following qualitative information is a summary analysis based on NBAMIL, and relevant Neuberger Berman group affiliates, detailed ongoing monitoring of execution quality for **Currency Derivatives** including **swaps, forwards and other currency derivatives**.

Requirement	
A. an explanation of the relative importance NBAMIL and its group affiliates 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>NBAMIL's central focus is the best execution for all NBAMIL clients. The considerations which NBAMIL will take account of when trading are a combination of the following execution factors:</p> <ul style="list-style-type: none">▪ Price – the spread between the market's mid-price and the executable price shown by the counterparty. The size of the trade is taken into account in order to define the fair bid-offer spread expected.▪ Speed of execution – the speed with which counterparties show an executable price. When timing of execution and defined market levels are prioritized by NBAMIL, the first available price may be taken, as long as it is within expected tolerance limits.▪ Market impact – the ability of the venue and/or counterparty to absorb the trade without impacting the wider market through information leakage.▪ Consistency – in respect of pricing, speed of execution, reliability (robustness of electronic systems and ability to show competitive prices during times of high market volatility) and the operational aspects of order execution – interaction with middle-office, system and settlement issues as well as connectivity. <p>The relative importance of the execution factors above are variable, depending on market conditions and other considerations. That said, the particular combination of total consideration (price of the instrument and costs of execution, both implicit and explicit) and size are usually the most considered factors when setting our execution strategy. NBAMIL's goal is always to treat all its clients fairly in achieving the best possible outcome.</p>

Quality of Execution Report, period covering 1 January 2019 – 31 December 2019

Requirement	
<p>B. description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders;</p>	<p>NBAMIL and/or any other Neuberger Berman group affiliates do not trade with or have any close links or common ownership with any execution venues or counterparties 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 nonmonetary benefits received;</p>	<p>NBAMIL and/or any other Neuberger Berman group affiliates will not receive payments, discounts or rebates in its currency instrument trading arrangements. Certain non-monetary benefits may be given and/or received by NBAMIL employees, but in all cases will comply with internal policies which deal with gifts/entertainment, and potential conflict of interest scenarios that may arise as a result.</p>
<p>D. an explanation of the factors that led to a change in the list of execution venues listed in NBAMIL's execution policy, if such a change occurred;</p>	<p>Having been initially approved, a counterparty will remain on NBAMIL's approved list of execution brokers and be subject to an ongoing monitoring process. This includes, but is not limited to, an assessment of creditworthiness and financial stability, a review of the execution services provided, and the counterparty's ability to trade effectively on our client's behalf. Each counterparty we use are dependent on their execution capabilities fitting the needs of a specific order, such as liquidity, market impact and certainty of execution. Counterparties will be removed from our list where they are found to be consistently delivering poor execution.</p> <p>As this is the first year these brokers will be reported under the NBAMIL entity for this asset class, there are no year on year comparisons to 2018.</p>
<p>E. an explanation of how order execution differs according to client categorisation, where NBAMIL treats categories of clients differently and where it may affect the order execution arrangements;</p>	<p>All NBAMIL clients are treated the same, however the efficiency of NBAMIL's process can be constrained for certain clients by:</p> <ul style="list-style-type: none"> ▪ The availability of counterparties due to limited legal arrangements in place (i.e. ISDA Master Agreements and CSA), which may impact the ability to trade efficiently in block trades on behalf of several accounts. ▪ Counterparty risk limits – where clients require counterparty risk exposure controls, trading could be constrained and mean less flexibility to trade. In some cases, certain trades may be split among several different counterparties in

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Requirement	
	<p>order to limit concentration risk, but this may not provide for best execution.</p> <ul style="list-style-type: none"> ▪ Limited venue and/or counterparty availability – certain clients may limit the ability to transact to certain venues or counterparties. In such cases, any decision to execute or place an order with a particular counterparty or venue will be made from the available set of counterparties/venues for that client.
<p>F. 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;</p>	<p>This is not applicable, as NBAMIL does not execute retail client orders.</p>
<p>G. an explanation of how NBAMIL has used any data or tools relating to the quality of execution, including any data published under Delegated Regulation (EU) 2017/575 – RTS27;</p>	<p>NBAMIL’s trade execution are reviewed as part of the Neuberger Berman Best Execution Committee’s oversight of execution quality. As part of this review, NBAMIL makes use of a third party independent TCA (Transaction Cost Analysis) provider to help with detailed monitoring of the quality of execution obtained across the counterparties and/or venues where we execute and/or place client orders for execution.</p>
<p>H. where applicable, an explanation of how NBAMIL has used output of a consolidated tape provider.</p>	<p>This is not applicable, as there are currently no consolidated tape providers in Europe providing this data.</p>

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