

**ANNUAL REPORT ON THE TOP
• FIVE VENUES IN 2019**

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1. INTRODUCTION

1.1. CONTEXT

The purpose of this document is to list the top five execution venues (in terms of trading volumes) on which Ostrum Asset Management executed client orders during the course of 2019, for each class of financial instrument, and to provide a summary on the quality of execution obtained.

The report meets the requirements set out in Article 27 of European Directive 2014/65/EU on financial instruments, known as MiFID II, and in Commission Delegated Regulation (EU) 2017/576 of 8th June 2016 (known as **RTS 28**) supplementing Directive 2014/65/EU of the European Parliament and of the Council with regard to regulatory technical standards for the annual publication by investment firms of information on the identity of execution venues and on the quality of execution.

As per the regulator's specifications, the report is based on the information available to Ostrum Asset Management for 2019, particularly as regards each class of financial instrument involved.



2. SCOPE

2.1. ASSET MANAGEMENT COMPANY

Ostrum Asset Management falls within the scope of RTS 28 on account of its management mandate activities, for which it transmits all its orders resulting from investment decisions on financial instruments to Natixis TradEx Solutions; **and on account of its provision of RTO services without order execution**, whereby it transmits orders for specific transactions directly to authorised intermediaries. The latter is described in its “Policy on the choice of intermediaries/counterparties and order execution” available on Ostrum Asset Management’s website: www.ostrum.com.

2.2. CLIENTS

This report is intended for Ostrum Asset Management clients, be they professional or non-professional under MiFID II, according to the category assigned to them by Ostrum Asset Management. However, Ostrum Asset Management offers its services exclusively to professional clients, so this ranking only applies to this category of client.

2.3. SERVICES

Ostrum Asset Management executes very few orders on the market directly, and it therefore applies the principle of best selection of intermediaries when providing portfolio management services on behalf of third parties and Reception and Transmission of Orders (**RTO**) services.

2.4. PRODUCTS

The “products” referred to in this report are financial instruments, within the meaning of MiFID II, and securities financing transactions (securities lending, repos, etc.).



3. RANKING OF THE TOP 5 VENUES

3.1. QUALITATIVE INFORMATION

In accordance with MIFID II, Directive on Markets in Financial Instruments, Ostrum Asset Management is organised in such a way as to obtain the best outcome for its clients when transmitting and executing orders, as described in its choice of intermediaries/counterparties and order execution policy.

- a) Relative importance given to price, cost, speed, probability of execution and any other consideration, including qualitative considerations, in the assessment made of quality of execution

Ostrum Asset Management transmits almost all its orders resulting from investment decisions on financial instruments to Natixis TradEx Solutions.

Natixis TradEx Solutions is an intermediation specialist with ad hoc tools and processes. Ostrum AM is therefore able to serve its clients' interests more effectively and obtains a better outcome. Natixis TradEx Solutions's infrastructure enables it to process orders in the best interests of its clients such as Ostrum Asset Management. It operates independently. The volumes it handles enables it to obtain the best prices and reduce operational risk.

Details of Natixis TradEx Solutions' selection criteria for order execution are described in its best selection and best execution policy available online on its website: www.tradex-solutions.natixis.com.

- b) Any close links, conflicts of interest and common ownerships with one or more intermediaries used for order transmission purposes

Natixis TradEx Solutions is a subsidiary of Groupe BPCE.

Ostrum Asset Management adheres to the regulatory principle of acting in the best interests of its clients - UCITS and AIF unitholders and shareholders - based on a policy and procedures designed to avoid conflicts of interest and to mitigate such situations should they arise. For this purpose, Ostrum Asset Management has established organisational measures and physical and legal information barriers with the other entities within its group.

Permanent controls performed on its activities and organisational set-up ensure that conflicts of interest are identified, mapped and mitigated¹.

- c) Specific arrangements with intermediaries selected to transmit orders or with execution venues as regards payments made or received, discounts, rebates or non-monetary benefits received

Ostrum Asset Management has no such arrangements.

- d) Factors having led to a change in the list of selected intermediaries provided in the firm's execution policy

Ostrum Asset Management has not modified its list of intermediaries selected for order transmission purposes.

- e) How order execution varies depending on client category

Order execution is identical regardless of client category.

- f) Other criteria given precedence over immediate price and cost when executing orders on behalf of clients

Over and above the criteria applied by Natixis TradEx Solutions, Ostrum Asset Management asks that the quality and associated cost of settlement-delivery be factored into the choice of execution venue.

¹ See the conflicts of interest policy available on Ostrum Asset Management's website: www.ostrum.com

3.2. RANKING WITH RESPECT TO PROFESSIONAL CLIENTS

a) Equities and similar instruments, according to liquidity

Tick size liquidity bands 1 and 2 (0 to 79 trades per day)

Class of financial instrument	a) Equities and similar instruments - equities and depository receipts iii) Tick size liquidity bands 1 and 2 (0 to 79 trades per day)				
State if <1 order was executed on average per business day in the previous year	Yes				
Top five execution venues ranked by trading volume (descending order)	Volume of executed orders as a percentage of the total volume in this category	Number of executed orders as a percentage of the total number in this category	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
SOCGEN (LEI: O2RNE8IBXP4R0TD8PU41)	64.77%	8.33%	Not applicable	Not applicable	0.00%
VIRTU ITG EUROPE LIMITED (LEI: 213800EEC95PRUCEUP63)	11.60%	25.00%	Not applicable	Not applicable	0.00%
JP MORGAN (LEI: K6Q0W1PS1L1O4IQL9C32)	7.48%	5.56%	Not applicable	Not applicable	0.00%
MERRILL LYNCH INTERNATIONAL (LEI: GGDZP1UYGU9STUHRDP48)	7.28%	8.33%	Not applicable	Not applicable	0.00%
EXANE (LEI: 969500UP76J52A9OXU27)	4.84%	36.11%	Not applicable	Not applicable	0.00%

Tick size liquidity bands 3 and 4 (80 to 1,999 trades per day)

Class of financial instrument	a) Equities and similar instruments - equities and depository receipts ii) Tick size liquidity bands 3 and 4 (80 to 1,999 trades per day)				
State if <1 order was executed on average per business day in the previous year	No				
Top five execution venues ranked by trading volume (descending order)	Volume of executed orders as a percentage of the total volume in this category	Number of executed orders as a percentage of the total number in this category	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
EXANE (LEI: 969500UP76J52A9OXU27)	20.92%	21.28%	Not applicable	Not applicable	0.00%
VIRTU ITG EUROPE LIMITED (LEI: 213800EEC95PRUCEUP63)	18.08%	15.79%	Not applicable	Not applicable	0.00%
KEPLER (LEI: 9695005EOZG9X8IRJD84)	10.57%	16.93%	Not applicable	Not applicable	0.00%
SOCGEN (LEI: O2RNE8IBXP4R0TD8PU41)	8.22%	8.24%	Not applicable	Not applicable	0.00%
ODDO (LEI: 9695002I9DJHZ3449O66)	8.11%	5.49%	Not applicable	Not applicable	0.00%

Tick size liquidity bands 5 and 6 (over 2,000 trades per day)

Class of financial instrument	a) Equities and similar instruments - equities and depository receipts				
	i) Tick size liquidity bands 5 and 6 (over 2,000 trades per day)				
State if <1 order was executed on average per business day in the previous year	No				
Top five execution venues ranked by trading volume (descending order)	Volume of executed orders as a percentage of the total volume in this category	Number of executed orders as a percentage of the total number in this category	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
VIRTU ITG EUROPE LIMITED (LEI: 213800EEC95PRUCEUP63)	17.68%	13.61%	Not applicable	Not applicable	0.00%
EXANE (LEI: 969500UP76J52A9OXU27)	9.35%	13.11%	Not applicable	Not applicable	0.00%
BARCLAYS (LEI: G5GSEF7VJP5I7OUK5573)	8.74%	9.90%	Not applicable	Not applicable	0.00%
CITIGROUP (LEI: E57ODZWZ7FF32TWEFA76)	9.37%	8.95%	Not applicable	Not applicable	0.00%
SOCGEN (LEI: O2RNE8IBXP4R0TD8PU41)	8.14%	7.64%	Not applicable	Not applicable	0.00%

b) Debt instruments

Class of financial instrument	b) Debt instruments				
State if <1 order was executed on average per business day in the previous year	No				
Top five execution venues ranked by trading volume (descending order)	Volume of executed orders as a percentage of the total volume in this category	Number of executed orders as a percentage of the total number in this category	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
TRADE WEB EUROPE LTD (MIC: TREU)	14.67%	47.62%	Not applicable	Not applicable	0.00%
BNP PARIBAS (LEI: R0MUWSFPU8MPRO8K5P83)	9.94%	4.02%	Not applicable	Not applicable	0.00%
MERRILL LYNCH INTERNATIONAL (LEI: GGDZP1UYGU9STUHRDP48)	7.98%	2.57%	Not applicable	Not applicable	0.00%
CITIGROUP GLOBAL MARKETS LTD (LEI: XKZZZJZF41MRHTR1V493)	6.62%	2.79%	Not applicable	Not applicable	0.00%
CA CIB (LEI: 1VUV7VQFKUOQSJ21A208)	6.03%	1.90%	Not applicable	Not applicable	0.00%

c) Interest-rate derivatives

Class of financial instrument	c) Interest-rate derivatives				
State if <1 order was executed on average per business day in the previous year	Yes				
Top five execution venues ranked by trading volume (descending order)	Volume of executed orders as a percentage of the total volume in this category	Number of executed orders as a percentage of the total number in this category	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
JP MORGAN (LEI: K6Q0W1PS1L1O4IQL9C32)	99.88%	79.71%	Not applicable	Not applicable	0.00%
NATIXIS (LEI: KX1WK48MPD4Y2NCUIZ63)	0.12%	20.29%	Not applicable	Not applicable	0.00%

d) Credit derivatives

Not applicable

e) Currency derivatives

Class of financial instrument	e) Currency derivatives				
State if <1 order was executed on average per business day in the previous year	Yes				
Top five execution venues ranked by trading volume (descending order)	Volume of executed orders as a percentage of the total volume in this category	Number of executed orders as a percentage of the total number in this category	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
JP MORGAN (LEI: 4PQUHN3JPFQFN3BB653)	35.78%	7.53%	Not applicable	Not applicable	0.00%
AUREL BGC (LEI: 5RJTDGZG4559ESIYLD31)	30.90%	68.82%	Not applicable	Not applicable	0.00%
SOCGEN (LEI: O2RNE8IBXP4R0TD8PU41)	16.53%	9.68%	Not applicable	Not applicable	0.00%
BARCLAYS (LEI: G5GSEF7VJP5I7OUK5573)	12.10%	7.53%	Not applicable	Not applicable	0.00%
GOLDMAN (LEI: W22LROWP2IHZNBB6K528)	3.97%	2.15%	Not applicable	Not applicable	0.00%

f) Structured financial instruments

Not applicable

g) Equity derivatives

Class of financial instrument	e) Equity derivatives				
State if <1 order was executed on average per business day in the previous year	Yes				
Top five execution venues ranked by trading volume (descending order)	Volume of executed orders as a percentage of the total volume in this category	Number of executed orders as a percentage of the total number in this category	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
SOCGEN (LEI: O2RNE8IBXP4R0TD8PU41)	51.57%	33.33%	Not applicable	Not applicable	0.00%
BARCLAYS CAPITAL LONDON (LEI: K9WDOH4D2PYBSLSOB484)	35.87%	16.67%	Not applicable	Not applicable	0.00%
BNP PARIBAS (LEI: R0MUWSFPU8MPRO8K5P83)	5.63%	16.67%	Not applicable	Not applicable	0.00%
MERRILL LYNCH INTERNATIONAL (LEI: GGDZP1UYGU9STUHRDP48)	2.22%	11.11%	Not applicable	Not applicable	0.00%
UBS SWITZERLAND AG (LEI: 549300WOIFUSNYH0FL22)	2.20%	11.11%	Not applicable	Not applicable	0.00%

h) Securitised derivatives

Not applicable

i) Commodity and emission allowance derivatives

Not applicable

j) Contracts for differences

Not applicable

k) Exchange-traded products

Class of financial instrument	e) Exchange-traded products				
State if <1 order was executed on average per business day in the previous year	Yes				
Top five execution venues ranked by trading volume (descending order)	Volume of executed orders as a percentage of the total volume in this category	Number of executed orders as a percentage of the total number in this category	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
NATIXIS (LEI: KX1WK48MPD4Y2NCUIZ63)	33.66%	27.78%	Not applicable	Not applicable	0.00%
OPTIVER (LEI: 7245009KRYSAYB2QCC29)	15.52%	5.56%	Not applicable	Not applicable	0.00%
GOLDMAN SACHS & CO LLC (LEI: FOR8UP27PHTHYVLBNG30)	14.64%	8.33%	Not applicable	Not applicable	0.00%
FLOW TRADERS B.V. (LEI: 549300CLJ19XDH12XV51)	7.54%	8.33%	Not applicable	Not applicable	0.00%
BNP PARIBAS (LEI: R0MUWSFPU8MPRO8K5P83)	6.64%	13.89%	Not applicable	Not applicable	0.00%

l) Emission allowances
Not applicable

m) Other instruments

Class of financial instrument	e) Other instruments				
State if <1 order was executed on average per business day in the previous year	Yes				
Top five execution venues ranked by trading volume (descending order)	Volume of executed orders as a percentage of the total volume in this category	Number of executed orders as a percentage of the total number in this category	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
CA CIB (LEI: 1VUV7VQFKUOQSJ21A208)	26.04%	38.71%	Not applicable	Not applicable	0.00%
HSBC FRANCE (LEI: F0HUI1NY1AZMJMD8LP67)	24.47%	12.90%	Not applicable	Not applicable	0.00%
SOCGEN (LEI: O2RNE8IBXP4R0TD8PU41)	17.59%	16.13%	Not applicable	Not applicable	0.00%
JP MORGAN (LEI: K6QOW1PS1L1O4IQL9C32)	12.13%	3.23%	Not applicable	Not applicable	0.00%
GOLDMAN (LEI: W22LROWP2IHZNBB6K528)	9.94%	9.68%	Not applicable	Not applicable	0.00%

3.3. RANKING WITH RESPECT TO NON-PROFESSIONAL CLIENTS

Not applicable

Ostrum Asset Management

Portfolio management company authorised by the Autorité des Marchés Financiers on 7th August 2018 under number GP-18000014. French public limited company with share capital of €48,518,602 – Registered in the Paris Trade and Companies Register under number 525 192 753 – VAT number: FR 93 525 192 753. Registered office: 43 avenue Pierre Mendès-France, 75013 Paris – www.ostrum.com

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Under its corporate social responsibility policy, and in accordance with the treaties signed by the French government, the funds directly managed by Ostrum Asset Management do not invest in any company that manufactures, sells or stocks anti-personnel mines or cluster bombs.



Ostrum Asset Management

Portfolio management company authorised by the Autorité des Marchés Financiers on 7th August 2018 under number GP-18000014 – French public limited company – Registered in the Paris Trade and Companies Register under number 525 192 753 – VAT number: FR 93 525 192 753.

Registered office: 43 avenue Pierre Mendès-France, 75013 Paris – www.ostrum.com

