

## BEST EXECUTION AND ORDER HANDLING DISCLOSURE STATEMENT

### BANK JULIUS BAER & CO. LTD.

#### 1 PURPOSE AND SCOPE

Bank Julius Baer & Co. Ltd. (hereinafter referred to as “Julius Baer” or “the Bank”) will take sufficient steps to obtain the best possible result for its clients when executing orders on behalf of them and/or receiving and transmitting client orders for execution to third party financial institutions (e.g. brokers, dealers, or connectivity service providers). To this end, Julius Baer has a best execution policy as well as related order handling and execution arrangements in place (together “the Policy”). Though, being a licensed Swiss bank and an entity regulated and supervised by the Swiss Financial Market Supervisory Authority (“FINMA”), to which the provisions of the EU Markets in Financial Instruments Directive 2014/65/EU (“MiFID II”) are not directly applicable, the Bank’s Policy is consistent with those standards.

The purpose of this document (the “Disclosure Statement” or “Statement”) is to provide clients of Julius Baer with key information on the measures established and implemented by the Bank, in order to fulfill its respective obligation of obtaining the best possible result for them on a consistent basis, when executing orders and/or receiving and transmitting for execution on behalf of them.

The Disclosure Statement applies to all Julius Baer clients. However, clients classified as eligible counterparty (as defined under European laws or regulations and/or Bank Julius Baer’s internal classification) are not within the scope of this Statement.

#### 2 BEST EXECUTION

“Best execution” is the obligation to take all sufficient steps to obtain the best possible result for a client when either executing transactions on a client’s behalf or using third party financial institutions to execute transactions on a client’s behalf, taking into account the best execution factors, as listed in Section 5. In this regard, executing client orders is usually possible on ‘trading venues’, such as regulated markets, multilateral trading facilities and organised trading facilities, but also via systematic internalisers, internal sources of liquidity or third party financial institutions that perform a similar function to any of the above (together the “Execution Venues”).

#### 3 EXECUTION VENUES

A list of the Execution Venues, most frequently used by the Bank, specifies the Execution Venues for each class of financial instruments. This list is published via a separate document “Bank Julius Baer Execution Venues” on the Bank’s [website](#). This list is not exclusive, but comprises Execution Venues on which the Bank places permanent significant reliance. However, the Bank reserves the right to use other Execution Venues, where it deems appropriate, in accordance with its Policy and may add or remove any Execution Venues to/from this list. Julius Baer regularly, at least annually, assesses the Execution Venues that are available and may update the list from time to time. Any updates will not be separately notified.

#### 4 BEST EXECUTION FRAMEWORK

The Bank has implemented an internal governance framework, including a best execution policy, through which it defines its best execution principles and

arrangements. This framework also includes control, monitoring and review processes as well as a reporting infrastructure with regard to the effectiveness of the Policy.

When selecting third party financial institutions for order execution arrangements, the Bank applies due diligence and approval processes which include an assessment of their best execution capabilities and aptitude to enable the best result as defined in the Bank's Policy.

The Bank has regular monitoring activities in place to determine whether best results have been consistently obtained on Execution Venues used by the Bank. However, Julius Baer is not obliged to monitor the order's immediate execution where it has transmitted the order for execution to a third party financial institution.

An overall review of the Policy is performed on an annual basis with regard to completeness and effectiveness of the framework (e.g. whether the selection criteria still lead to the same selection of brokers) or whenever a material change occurs that could affect the Bank's ability to obtain the best possible results for its clients on a consistent basis. Material changes to the Statement will be notified by posting an updated version on the Bank's [website](#).

## 5 BEST EXECUTION FACTORS AND CRITERIA

Julius Baer takes into consideration the following execution factors to determine the best possible result for its clients:

- **Price** – this is the price a financial instrument is executed at;
- **Cost** – this includes implicit costs such as the possible market impact and explicit external costs, e.g. Execution Venue or clearing and settlement fees and explicit internal costs (the Bank's own commissions and fees);
- **Speed** – time it takes to execute a client transaction;
- **Likelihood of execution and settlement** – the likelihood that the Bank will be able to complete a client transaction;
- **Size** – this is the size of the transaction executed for a client, accounting for how this affects the price of execution;
- **Nature** of the transaction or **any other consideration** relevant to the execution of the

transaction. This is how the particular characteristics of a client transaction can affect how best execution is achieved.

Some of the above factors are considered to be more important than others. Their relative importance may vary, taking into account the following criteria:

- **Characteristics of a client** – including the regulatory categorization of a client;
- **Characteristics of a client order** – e.g. order size or type (e.g. limit order);
- **Financial instrument** that is subject to the transaction – e.g. asset class;
- **Execution venue** to which an order can effectively be directed.

In most cases, the price of the financial instrument and costs relating to execution of the order (total consideration) will merit the highest relative importance in obtaining the best possible result. However, the overall value to a client of a particular transaction may be affected by other factors. The Bank may in specific cases place a higher importance to other execution factors than price and costs for obtaining the best possible result in accordance with its Policy.

## 6 PRINCIPAL VS. AGENT TRADING

When the Bank acts as commission agent (i.e. entering into a trade in its own name for and on behalf of a client), it forwards the order to an Execution Venue directly or via a third party financial institution for execution on behalf of a client. The Execution Venue will match a client's order with a corresponding buy or sell order from another venue participant. Julius Baer is arranging the trade, but does not buy or sell the instrument for a client on its own book. Clients will receive or pay the current market price of the instrument as traded on the Execution Venue. Depending on the asset class and the Execution Venue, the Bank will either charge a client a market access service fee that includes the entire Bank's internal and external costs, except taxes and stamp duties, or charge a brokerage fee, supplemented by external costs as applicable to the trade.

When acting as principal, Julius Baer itself becomes the counterparty of a client and will directly buy or sell the instrument from or to a client at the Bank's own risk. Clients pay the transaction cost of principal

trades either by paying a commission to the Bank, or Julius Baer may factor the transaction cost directly into the instrument price (“Fixed Price Transaction”). No additional external brokerage or venue fees apply in a Fixed Price Transaction, but transaction taxes may apply. In the case of Fixed Price Transactions, the Bank will meet its best execution obligation by applying a market conformity check, ensuring that a product’s pricing parameters are reasonable and in conformity with the market.

## **7 LIMITS OF THE BEST EXECUTION OBLIGATION**

### **7.1 Specific Client Instructions**

Where clients provide Julius Baer with a specific instruction in relation to an order (such as a specific price limit or execution on a particular Execution Venue), Julius Baer will follow that instruction so far as is reasonably possible, when executing the trade. In such cases, the obligation to provide best execution is satisfied by following the specific client instruction, instead of applying the best execution principles described in this Statement.

### **7.2 Non-reliance**

A best execution obligation does not apply where Julius Baer acts as principal and a client is not placing legitimate reliance on Julius Baer to protect its interest in relation to pricing and other aspects of the execution of the transaction. This is particularly assumed in the following situations:

- a client is ‘shopping around’ by getting quotes from the Bank and further counterparties for the purpose of finding the best price by himself;
- a client approaches the Bank with a specific request to buy a financial instrument from the Bank or sell a financial instrument to the Bank;
- a client’s access to pricing transparency is equal or similar to the Bank’s access, a client proposes the price, and where he would be able to approach a different bank with the same request.

### **7.3 Outside a Trading Venue Consent**

Unless explicitly instructed by a client, Julius Baer may execute all or parts of a client order in financial instruments that are admitted to trading on a trading venue (i.e. regulated market, multilateral trading facility or organised trading facility) outside a trading venue (OTC).

## **8 BEST EXECUTION ASPECTS PER CLASS OF FINANCIAL INSTRUMENTS**

### **8.1 Equities and Equity-like Instruments**

Orders in Swiss equities and equity-like instruments are executed by the Bank acting as commission agent on regulated trading venues either directly on a trading venue of which the Bank is a member or participant or via dedicated third party service providers whose smart-order-routing logic places client orders on the most liquid trading venues.

Other equities and equity-like instruments are executed via dedicated brokers. Selected brokers and third party service providers have a track record of achieving the best result in terms of the relevant execution factors.

### **8.2 Fixed Income (“FI”) Instruments**

The majority of FI instruments are traded by the Bank acting on a riskless principal basis on trading venues like MTF platforms. The Bank typically approaches at least four external counterparties (if available) which trade a particular bond with a request to receive a firm quote. The Bank selects those counterparties based on commercial judgement and experience in light of the market information available, while taking into consideration several factors such as a dealer’s performance with regard to showing a price to an inquiry, an indicative price shown by a dealer on a trading venue, a dealer’s track record in unsettled trades/”buy-ins” and a dealer’s quality and capacity to deal in a specific sector/market. The Bank preferably trades with dealers who also engage in new issues as lead managers, compared to the brokerage-only firms. Closure of a trade is usually being done via bilateral acceptance with the counterparty either electronically via a trading platform or via phone/chat outside of a trading platform (“OTC”). If a trade is being done via phone/chat, it has to be confirmed on a venue, usually via a trade confirmation. The Bank trades FI instruments towards the client at the best price obtained (plus external transaction fees, if applicable) or the Bank charges the client an agreed price for the FI instrument (including transaction fees) in case the Bank has agreed with the client on a “fixed price transaction”. In most cases, accrued interest will be added on top of the agreed principal price.

In addition, the Bank may itself act as market maker in selective Fixed Income issues. Therefore, the Bank

may act as direct counterparty to the transaction, when offering the terms most favourable to the client.

For FI instruments that are listed or admitted to trading on an exchange/regulated market, orders may be executed by the Bank acting as commission agent either directly on an exchange/regulated market of which the Bank is a member or participant, or via dedicated brokers. However, by default the Bank trades FI instruments on MTFs or OTC (as described above), unless it can be reasonably concluded that a particular instrument is more liquid on an exchange/regulated market.

### 8.3 Units in Collective Investment Undertakings (“Funds”) / Exchange Traded Funds (“ETFs”)

a) Collective Investment Schemes (“Funds”): Units in collective investment schemes are normally subscribed and redeemed directly with a fund provider (primary market) as the only execution venue. A subset of those funds is also available on trading venues (secondary market). In such cases, the Bank decides, based on commercial judgement, knowledge and experience and taking into consideration the liquidity of the product, whether the order shall be executed via a fund provider or on a trading venue. A small, distinct subset of funds may be traded OTC via the Bank’s Funds Secondary Trading desk with the Bank acting as principal and only if instructed by the client or when it is in the best interests of the client.

b) Exchange Traded Funds (“ETFs”): The Bank executes orders for ETFs on the respective trading venues acting as commission agent, either directly on a trading venue, of which the Bank is a member or participant, or via dedicated brokers or third party service providers that have a track record of achieving the best result in terms of the relevant execution factors.

### 8.4 Structured Products (“SP”)

a) Tailor-made OTC structured products: A tailor-made structured product is a unique product, based on a bilateral contract between

the issuer and the client, and often created by issuers at the client’s specific request. Therefore, best execution principles with regard to execution venue selection do not apply.

b) Other OTC structured products: Orders in OTC structured products are executed by the Bank acting as principal outside of a trading venue. If there are several providers, the Bank endeavours to obtain quotes in the market to deal on the best available price or to execute the product via its own book. However, with less liquid instruments, there may be only one product provider and therefore only one available price to trade on. Orders may be executed as ‘fixed price transactions’ with an agreed instrument price, including a transaction fee.

Generally, when trading structured products of a bespoke nature OTC, the Bank needs to apply a market conformity check and to assess the fairness of the price proposed to the client on a case by case basis, by collecting market data used in the estimation of the price for such product and by comparing the relevant product with similar or comparable products, where possible.

c) Exchange traded structured products: Orders in structured products that are admitted to trading on a trading venue are executed by the Bank as commission agent directly at the dedicated trading venue of which the Bank is a member or participant or via dedicated third party brokers.

### 8.5 Exchange Traded Derivatives (Traded Options and Futures)

Orders in EUREX traded futures and options are executed by the Bank directly as a member of EUREX. Non-EUREX traded futures and options are traded exclusively through dedicated third party brokers that have a track record of achieving the best result in terms of the relevant execution factors.

### 8.6 Over the Counter (“OTC”) Derivatives

Orders in OTC derivatives (e.g. with FX or credit underlying) are executed outside of regulated trading venues. The Bank acts as principal and becomes the counterparty of a derivative contract with the client.

Client requests received by the Bank to trade in OTC derivatives are treated as a request for a quote from the Bank to enter into a trade as a 'fixed price transaction' with an instrument price agreed with the client. Best execution principles described in this Policy apply only to a limited extent, where the Bank and the client agree on terms of an agreement to purchase a financial instrument at a fixed or determinable price.

In general, when executing client orders OTC, the Bank needs to apply a market conformity check and to assess the fairness of the price proposed towards the client on a case by case basis, by collecting market data used in the estimation of the price for such product and by comparing the relevant product with similar or comparable products, where possible.

Furthermore, certain types of derivatives (such as IRS or CDS) may be traded via specific trading systems like OTF platforms.

### 8.7 Relevance of the Best Execution Factors

The below table shows, as a general indication, how the Bank determines the relative importance (priority) of best execution factors per class of financial instruments:

#### Relevance of the Best Execution Factors

Best Execution Factors	Equities & equity-likes	Fixed Income	Funds	Structured Products Exchange Traded	Structured Products Traded OTC	ETD	OTC Derivatives
Price	high	high	high	high	high	high	high
Costs	high	medium	medium	medium	medium	high	medium
Speed of execution	medium	low	medium	low	low	medium	low
Likelihood of execution	low	high	medium	medium	low	medium	low
Likelihood of settlement	low	high	low	low	low	low	low
Size of the order	medium	medium	medium	medium	medium	n/a	medium
Nature of the order	low	low	n/a	low	low	n/a	low
Any other consideration relating to the execution of the order	low	medium	low	low	high	low	high

However, on a case by case basis and subject to any specific client instructions, the Bank may prioritise one or more of the execution factors differently as shown in the above table and this may result in different permissible approaches used by the Bank on a per-order basis. For example, in markets where there is insufficient available liquidity, the importance of the likelihood of execution may increase. While in markets where volatility is high, the speed of execution may potentially be more important.

Also, the Bank reserves the right to intervene in the execution of such orders which could result in adverse market impact (e.g. large orders).

## 9 CLIENT ORDER HANDLING

This section provides general information on how client orders will be handled, including an overarching objective that the Bank ensures that orders executed on behalf of clients are executed promptly, fairly and accurately.

### 9.1 Chronological Order Execution

Julius Baer will execute comparable client orders immediately and in the order in which they were received unless this is rendered impossible by the characteristics of the order or current market conditions or where other measures are required as a consequence of a client's best interests.

### 9.2 Order Aggregation

Julius Baer may bundle and compile client orders with orders of other Julius Baer clients to execute such aggregated orders as block orders. The Bank will only aggregate orders if it is unlikely that the aggregation will work overall to the disadvantage of an individual client. However, it cannot be excluded that at certain occasions and in relation to a particular order, the effect of the aggregation may be disadvantageous to a client.

### 9.3 Publication of non-executed Limit Orders

Julius Baer will not make public immediately unexecuted limit orders in respect of shares admitted to trading on a regulated market and/or traded on a trading venue, although the Bank may in its own discretion or when explicitly instructed by a client do so.

## 10 FURTHER INFORMATION

Should you have any questions about the Disclosure Statement, please contact your Relationship Manager.

The documents mentioned in this Statement, in particular "Bank Julius Baer Execution Venues", are available at the Bank's dedicated MiFID II website ([www.juliusbaer.com/mifid](http://www.juliusbaer.com/mifid)) and are updated at least on an annual basis.

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## CONTACT

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BANK JULIUS BAER & CO. LTD.  
Bahnhofstrasse 36  
P.O. Box  
8010 Zurich  
Switzerland  
Telephone +41 (0) 58 888 1111  
Fax +41 (0) 58 888 1122  
[www.juliusbaer.com](http://www.juliusbaer.com)

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