STIFEL

Stifel Europe Bank AG
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Execution Quality Summary according to Article 3 (3) of the Commission Delegated Regulation (EU) 2017/576 ("RTS 28") and Article 65 (6) of the Commission Delegated Regulation (EU) 2017/565

Period 01.01.2022 – 31.12.2022

Valid for all Instrument Classes STIFEL EUROPE BANK AG trades

The MiFID II regulations[1] require investment firms to publish on an annual basis information about the quality of its execution practices. STIFEL EUROPE BANK AG ("SEBA" or "Bank") wants to give herewith its summary information and conclusions as required by RTS 28, Art 3 (3) and Article 65 (6). The summarised presentation in accordance with MiFID II covers all asset classes that SEBA trades. For reporting purposes, SEBA consolidates a review of orders executed directly with venues and orders executed indirectly via third parties in 2022 in this summary.

(a) 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:

The Bank's Best Execution Policy sets out the approach to provide the best possible result when accepting an order and executing a transaction for Professional Clients as required according to the Markets in Financial Instruments Directive 2014/65/EU, related RTS respective national law and additional guidance by national regulatory bodies (together "MiFID II").

SEBA has taken during the reporting period all sufficient steps to execute such transactions in financial instruments on terms most favourable to clients on a consistent basis ("Best Execution" or "Best Execution obligation"). Similarly, SEBA has monitored on a regular basis not only the execution quality obtained but also the quality and appropriateness of its execution arrangements and policies on an ex ante and ex post basis to identify circumstances under which changes might have been appropriate.

The Bank is indeed required to take all sufficient steps to obtain the best possible result on a consistent basis taking into account the price, likelihood of execution and settlement, order size, costs, speed, nature or any other consideration relevant to the execution of an order.

<u>Equities:</u>

Depending on the order type, different factors have been given priority in line with our best execution policy. I.e.

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[1] Markets in Financial Instruments Directive 2014/65/EU (MiFID II) together with the Commission Delegated Regulation (EU) 2017/575 (formerly "RTS 28") and Article 65 (6) of the Commission Delegated Regulation (EU) 2017/565 ("Article 65 (6)")

For client-directed orders:

1. Speed
2. Costs

For working orders:

1. Price
2. Likelihood of execution and settlement

The remaining execution factors are generally given equal ranking.

Debt Instruments:

The following execution factors have indeed been considered as the most important factors to fulfil Best Execution:

- Price
- Likelihood of execution and settlement

The remaining execution factors are generally given equal ranking.

The individual importance of the Best Execution factors may have varied, when executing client orders. Best Execution therefore applied in a manner that has taken into account the different circumstances associated with the transaction:

- The characteristics of the client, including the experience and understanding of the market in question and the MiFID II classification as a Professional Client
- The characteristics of the order and the nature of the dealing service require by SEBA
- The characteristics of MiFID financial instruments that are the subject of your order
- The characteristics of the Execution Venues to which your order can be directed

SEBA had during the reporting period the necessary procedures and arrangements in place as well as an appropriate valuation system. The Bank has routinely taken into account external market data and externally verifiable reference prices (where available) to ensure the fairness of the price for its clients' transactions.

(b) A description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders:

STIEFEL EUROPE BANK AG is ultimately fully owned by Stifel Financial Corp. and uses its affiliates Stifel Nicolaus Europe Limited and Stifel, Nicolaus & Company Inc. as brokers to execute orders. The execution quality received from affiliated entities is subject to the same monitoring and assessment applied to third party entities and execution venues utilised for execution of client orders.

There were no other conflicts of interest through common ownership structure or affiliate relations with any of the venues or brokers used to execute client orders.

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

The Bank operates with every venue or broker on the basis of the counterparty's respective standard terms of business and publicly available price lists of the venue. SEBA does not and did not receive any remuneration, discount or any non-monetary benefit for routing an order to a particular regulated market place or trading venue based on inducement rules as stated in the STIFEL GROUP Code of Conduct.

(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:

When executing a transaction for the client the venue(s) will be chosen by taking into account the following factors (ranked by importance) in order to obtain the best possible result on a consistent basis:

(1) Liquidity and price of the venue

(2) Performance and likelihood of execution

(3) Settlement risk of the venue

(4) Credit risk of the venue

(5) Infrastructure and operational stability of the venue

(6) Fees and other costs charged by the venue

SEBA has regularly assessed the market landscape to determine whether or not there were alternative execution venues. This assessment was executed across different execution venues by analysing the above series of metrics.

The Bank has reviewed in 2022 regularly the access to all important liquidity sources. During the year SEBA has become a full trading member on Borsa Italiana MTAA market. There have been no other changes in the list of Venues and Brokers to which SEBA is directly connected. The Bank still appreciates a direct access to the primary market in its core markets. But with its network of affiliates and various global Brokers it can similarly access all other markets and venues to achieve best execution to the benefit of its clients. There have been minor adjustments in 2022 in the connectivity by 3rd party brokers to certain liquidity venues. Each adjustment is purely driven by above mentioned factors, i.e. accessing a broader spectre of liquidity in the interest of Best Execution.

(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;

SEBA exclusively serves professional clients. All SEBA clients are treated equally in terms of execution arrangements.

(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;

N/A – the Bank does not carry out any business with retail clients

(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 Commission Delegated Regulation (EU) 2017/575 (RTS 27)

SEBA uses, amongst other systems, a Transaction Cost Analysis (TCA) system to monitor and evaluate the execution quality and broker performance on an ongoing basis. SEBA considers the following TCA factors to be important for the evaluation:

Improvement / Shortfall	The total value of price movement (or shortfall) achieved over all trades executed in the reporting period. If all trades were executed at exactly the benchmark value, this number would be 0. A positive value implies overall price improvement versus benchmark prices. A negative value indicates an overall shortfall.
VWAP	Benchmark is the VWAP price of all public trades on all venues (including MTFs) over the period of the order. For limit price VWAP orders, the VWAP is based on all public trades are up to and including the limit price.
PVWAP5%	VWAP at an indicative participation level of 5%.
Price Improve	The average amount (in basis point) that each fill improved on the price that would be achieved by sending a single aggressive order to the best venue at the time of the fill.
% Spread Capture	The average spread capture in % achieved over all fills. Spread capture of 0.0% indicates that the fill occurred at aggressive EBBO (European Best Bid an Offer) price, a spread capture of 50% indicates an EBBO mid-point match a spread capture of 100% indicates a fill occurred at passive EBBO price.
% Price Move 100ms	The relative price movement within that period since execution, not taking into account the sign of the figure.
Absolute Impact 100ms (in bps)	The difference in basis points between the mid-price at the time and execution time.
Average Trade Size	
Other soft factors	e.g. Service quality, settlement quality etc.

These criteria are weighted according to their importance and the resulting coefficient offers an orientation with regard to a desired optimal execution in the best interest of the client. The TCA assessment was carried out at regular intervals in order to be able to respond to developments at an early stage.

(h) Where applicable, 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

STIFEL EUROPE BANK AG

Frankfurt am Main, April 2023

Board of Management