

MiFID II RTS 28 Report - Reception and Transmission of Orders Top 5 Brokers, Retail Clients
Luso Partners - Sociedade Corretora S.A. - 2017

Class of Instrument	Equities – Shares & Depositary Receipts - Tick size liquidity bands 1 and 2				
Notification if <1 average trade per business day in the previous year	N				
Top five execution brokers 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
Lek Securities Corporation - 549300X3VRB2P0N1KR45	100,00%	100,00%	67,23%	32,77%	

Class of Instrument	Equities – Shares & Depositary Receipts - Tick size liquidity bands 3 and 4				
Notification if <1 average trade per business day in the previous year	N				
Top five execution brokers 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
Haitong Bank, S.A. - Haitong Bank, S.A. - GDI8P8WHFH4PS5YTU851	50,40%	48,34%	83,44%	16,56%	
Lek Securities Corporation - 549300X3VRB2P0N1KR45	49,23%	51,31%	57,38%	42,62%	
SAXO BANK A/S - 549300TL5406IC1XKD09	0,37%	0,36%	50,00%	50,00%	

Class of Instrument	Equities – Shares & Depositary Receipts - Tick size liquidity bands 5 and 6				
Notification if <1 average trade per business day in the previous year	N				
Top five execution brokers 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
Haitong Bank, S.A. - Haitong Bank, S.A. - GDI8P8WHFH4PS5YTU851	59,38%	40,97%	69,78%	30,22%	
SAXO BANK A/S - 549300TL5406IC1XKD09	40,62%	59,00%	50,00%	50,00%	
Lek Securities Corporation - 549300X3VRB2P0N1KR45	0,0023%	0,03%	0,00%	100,00%	

Class of Instrument	Exchange traded products (Exchange traded funds, exchange traded notes and exchange traded commodities)				
Notification if <1 average trade per business day in the previous year	N				
Top five execution brokers 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
Lek Securities Corporation - 549300X3VRB2P0N1KR45	50,03%	56,91%	63,18%	36,82%	
Haitong Bank, S.A. - Haitong Bank, S.A. - GDI8P8WHFH4PS5YTU851	40,95%	26,85%	74,90%	25,10%	
SAXO BANK A/S - 549300TL5406IC1XKD09	9,03%	16,24%	50,00%	50,00%	

Class of Instrument	Equity Derivatives - Options and Futures admitted to trading on a trading venue				
Notification if <1 average trade per business day in the previous year	N				
Top five execution brokers 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
Lek Securities Corporation - 549300X3VRB2P0N1KR45	100.0%	100.0%	48,58%	50,42%	

Class of Instrument	Other				
Notification if <1 average trade per business day in the previous year	N				
Top five execution brokers 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
SAXO BANK A/S - 549300TL5406IC1XKD09	95,90%	96,05%	50,00%	50,00%	
Haitong Bank, S.A. - Haitong Bank, S.A. - GDI8P8WHFH4PS5YTU851	3,63%	2,77%	80,00%	20,00%	
Lek Securities Corporation - 549300X3VRB2P0N1KR45	0,4700%	1,68%	12,50%	87,50%	

Explanatory Note Top 5 Brokers

Classification of Passive / Aggressive Orders:

- Aggressive order is defined as an order that is submitted to a venue which runs an order book and took liquidity on the order book
- Passive order is defined as an order that is submitted to a venue which runs an order book and provided liquidity on the order book
- No orders are directed as thus field is not specified

Categorisation of Products into Classes of Financial Instruments:

- Equities – Shares & Depositary Receipts

- o EU Cash Shares covered by the MiFID II tick size regime. Instruments are placed into liquidity bands based on the ADNT (average daily number of transactions) values published by ESMA
- o Liquidity Band 6 can be seen as representing the the most liquid instruments and Liquidity Band 1 the least liquid instruments, based on ADNT values.

- **Interest rates derivatives - Futures and options admitted to trading on a trading venue**
 - o Contract Futures and Contract Options within sectors “Financials - Short-term Interest Rates” and “Financials – Bonds”
- **Currency derivatives - Futures and options admitted to trading on a trading venue**
 - o Contract Futures and Contract Options within sector “Financials – Currencies”
- **Equity Derivatives - Options and Futures admitted to trading on a trading venue**
 - o Contract Futures and Contract Options within sector “Stock Indices” and Stock Options and Stock Index Options
- **Securitised Derivatives - Warrants and Certificate Derivatives**
 - o Warrants
- **Commodities derivatives and emission allowances Derivatives - Options and Futures admitted to trading on a trading venue**
 - o Contract Futures and Contract Options within sectors “Agriculture”, “Base Metals”, “Commodity Index”, “Energies”, “Meats”, “Precious Metals”, “Softs”
- **Contracts for difference**
 - o CFDs on Single Stocks/ETFs executed via agency model
- **Exchange traded products (Exchange traded funds, exchange traded notes and exchange traded commodities)**
 - o ETFs, ETN, ETC
- **Other**
 - o EU Cash Shares not covered by the MiFID II tick size regime
 - o US and APAC Cash Shares
 - o Mutual Funds

Data:

This first set of RTS 28 report is based on data for the calendar year 2017. However it should be noted that data on passive/aggressive indicators for orders is only included for Dec 2017 , as data for the full preceeding year has not been available.

Thus indicator is not available for brokers/venues with no executions in Dec 2017.

ESMA has recognized that for the first set of RTS 28 reports, firms may not be able to fully report on information which is not available or applicable in relation to the preceding year e.g. where it is tied to new

[provisions stemming from MiFID II or MiFIR. \(Question/Answer 6\):](#)

https://www.esma.europa.eu/system/files_force/library/esma35-43-349_mifid_ii_qas_on_investor_protection_topics.pdf