

Aion Bank  
MIFID II RTS 28 - Annual Best Execution Disclosure 2021  
Top 5 Venues  
Quality of Execution Statement

<b>Class of Instrument</b>	Exchange traded products (Exchange traded funds, exchange traded notes and exchange traded commodities)				
<b>Notification if &lt; 1 average trade per business day in the previous year</b>	N				
<b>Top 5 Venues ranked in terms of trading volumes (descending order)</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
SAXO Capital Markets UK - 2138002TJAEVDI8BF78	100%	100%	-	100%	-

**Execution Factors**

In taking all reasonable steps to obtain the best possible result for its clients, Aion Bank took into account various execution factors in deciding how and where to execute client orders including price, costs, speed, likelihood of execution and settlement, size, nature of the order and any other considerations relevant to the execution of an order.

To determine the relative importance and priority of these execution factors, Aion Bank used its commercial experience and judgment in addition to taking into account criteria relevant to best execution, such as the client's status as a retail client, the size and nature of the order, the characteristics of the financial instrument to which the order relates, as well as the possible execution venues to which that order can be directed.

**Conflicts of interest & specific arrangements**

Aion Bank has no conflicts of interest or close links with any of the venues or market participants that we conduct business with, nor do we have any specific arrangements with any of the venues or market participants regarding payments, discounts, rebates or other benefits received.

**Policy Review & Quality of Execution**

We review our best execution policy annually. We did not make any changes to brokers during 2021, but did make changes to the venues we traded on. Order execution is monitored pre- and post-trade on an ongoing basis and is subject to testing and evidencing against best execution factors. We conduct regular post-trade analytics to ensure our pre-trade evaluation is performant.

**Customer categorisation**

Aion Bank only conducts business with retail clients and therefore does not have any specific execution arrangements for other customer categories.

**Usage of data or tools related to the quality of best execution**

aion bank

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Aion Bank utilizes reliable sources of market data (InFront) in relation to the quality of the execution obtained for the clients and data provided by a dedicated tool ("Transaction Cost Analysis").