RTS 28 – SUMMARY of the ANALYSIS and CONCLUSIONS

	Deht	Instruments: Bor	nds					
Information on the top five execution venues used for Re		instruments. Der						
Class of Instruments		Debt Instruments: Bonds						
Notification if <1 average trade per business day in the								
pervious year		Υ						
Top five execution venues ranked in terms of trading		Proportion of volume traded as a	Proportion of orders executed as	Percentage of	Percentage of	Percentage of		
volumes (descending order)	LEI/MIC	percentage of total in that class	, ,			directed orders		
Credit Europe Bank N.V.	P2HWO703XN8TPXCGU747	100.00%	in that class 100.00%	passive orders 100%	aggressive orders 0%			
Cledit Europe Balik N.V.	PZHWO/U3XN81PXCGU/4/	100.00%	100.00%	100%	U%	U%		
Information on the top five execution venues used for Pr	ofessional Clients	J.			J.	l.		
Class of Instruments								
Notification if <1 average trade per business day in the								
pervious year		Υ						
		Proportion of	Proportion of orders					
		volume traded as a	executed as					
Top five execution venues ranked in terms of trading		percentage of total	percentage of total	Percentage of	Percentage of	Percentage of		
volumes (descending order)	LEI/MIC	in that class		passive orders	aggressive orders	directed orders		
Credit Europe Bank N.V.	P2HWO703XN8TPXCGU747	37.41%	35.51%	6%		0%		

(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

35.80%

18.90%

5.319

36.96%

23.199

2.179

0%

0%

0%

100%

100%

100%

0%

0%

0%

For a detailed explanation of the CEB N.V. best execution policy, a client disclosure is available through: http://www.crediteuropebank.com/uploads/tx_templavoila/CEB_NV_Best_Execution_Policy.pdf

MiFID requires CEB to take all sufficient steps to obtain the best possible result for you taking into account price, costs, speed, likelihood of execution and settlement, size, nature and/or any relevant order execution consideration. When determining whether Best Execution has been achieved, on an overall basis, CEB NV gives precedence to price and cost. For large size orders, the market impact of the order is also given consideration. For orders in new bond issues, allocation is given consideration.

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

CEB NV may from time to time execute transactions in certain asset classes with or through affiliated entities. CEB NV can also act as the execution venue itself when acting on a principal to principal basis. Execution quality received from affiliated entities, or own book is subject to the same monitoring and assessment which would be applied to third party entities and execution venues utilized for execution of client orders. CEB NV also has in place a conflict of interest handling policy to take all appropriate steps to identify and to prevent or manage any potential conflicts of interests which entail a material risk of damage to customers' interests.

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

No fees or rebates were received from any of the execution venues.

Bloomberg Multilateral Trading Facility

MarketAxess Europe MTF

Bloomberg Trading Faclity B.V.

(d) 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

A number of execution venues were added to the list of execution venues. Due to Brexit, several UK based execution venues and SIs established new EU based entities. CEB NV, as a European bank gradually shifted its trading from UK based venues to the EU based venues throughout the course of 2020. The updated list of execution venues is available through:

https://www.crediteuropebank.com/uploads/tx_templavoila/Best_Execution_Policy_-_Appendix_1.pdf

BMTF

MAEL

BTFE

(e) 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

The choice of execution venues is generally not determined or differentiated according to client categorisation.

(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

When determining whether Best Execution has been achieved, on an overall basis, CEB NV gives precedence to price and cost. For large size orders, the market impact of the order is also given consideration. For orders in new bond issues, allocation is given consideration.

(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 RTS 27

Credit Europe Bank N.V. monitors the quality of execution, using external and independent market data against which to compare our execution quality. If no observable market price is available for a specific instrument, we check the fairness of the price by using relevant market data and, where possible, by making a comparison with similar or comparable products. Our monitoring also includes exception-based controls, with results reviewed by mid-office and front office staff and are subject to periodic compliance monitoring.

(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



RTS 28 – SUMMARY of the ANALYSIS and CONCLUSIONS

Cur	rency Derivatives: Swaps	, Forwards and O	ther Currency D	erivatives	•				
Information on the top five execution venues used for R									
Class of Instruments		Currency Derivatives: Swaps, Forwards and Other Currency Derivatives							
Notification if <1 average trade per business day in the									
pervious year		Υ							
		Proportion of	Proportion of orders						
I		volume traded as a	executed as						
Top five execution venues ranked in terms of trading		percentage of total	percentage of total	Percentage of	Percentage of	Percentage of			
volumes (descending order)	LEI/MIC	in that class	in that class	passive orders	aggressive orders	directed orders			
Credit Europe Bank N.V.	P2HWO703XN8TPXCGU747	100.00%	100.00%	0%	100%	0)%		
							_		
<u> </u>									
	Ļ								
	1						_		
Information on the top five execution venues used for P	rofessional Clients	Ī							
Class of Instruments									
Notification if <1 average trade per business day in the									
pervious year		N							
		Proportion of	Proportion of orders						
		volume traded as a	executed as						
Top five execution venues ranked in terms of trading		percentage of total	percentage of total	Percentage of	Percentage of	Percentage of			
volumes (descending order)	LEI/MIC	in that class	in that class	passive orders	aggressive orders	directed orders			
Credit Europe Bank N.V.	P2HWO703XN8TPXCGU747	100.00%	100.00%	0%	100%	0)%		

(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

For a detailed explanation of the CEB N.V. best execution policy, a client disclosure is available through http://www.crediteuropebank.com/uploads/tx_templavoila/CEB_NV_Best_Execution_Policy.pdf

MiFID requires CEB to take all sufficient steps to obtain the best possible result for you taking into account price, costs, speed, likelihood of execution and settlement, size, nature and/or any relevant order execution consideration. When determining whether Best Execution has been achieved, on an overall basis, CEB NV gives precedence to price and cost. For large size orders, the market impact of the order is also given consideration.

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

CEB NV may from time to time execute transactions in certain asset classes with or through affiliated entities. CEB NV can also act as the execution venue itself when acting on a principal to principal basis. Execution quality received from affiliated entities, or own book is subject to the same monitoring and assessment which would be applied to third party entities and execution venues utilized for execution of client orders. CEB NV also has in place a conflict of interest handling policy to take all appropriate steps to identify and to prevent or manage any potential conflicts of interests which entail a material risk of damage to customers' interests

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

No fees or rebates were received from any of the execution venues.

(d) 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

A number of execution venues were added to the list of execution venues. Due to Brexit, several UK based execution venues and SIs established new EU based entities. CEB NV, as a European bank gradually shifted its trading from UK based venues to the EU based venues throughout the course of 2020. The updated list of execution venues is available through:

https://www.crediteuropebank.com/uploads/tx_templavoila/Best_Execution_Policy_-_Appendix_1.pdf

(e) 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

The choice of execution venues is generally not determined or differentiated according to client categorisation.

(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

When determining whether Best Execution has been achieved, on an overall basis, CEB NV gives precedence to price and cost. For large size orders, the market impact of the order is also given consideration. For orders in new bond issues, allocation is given consideration.

(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 RTS

Credit Europe Bank N.V. monitors the quality of execution, using external and independent market data against which to compare our execution quality. If no observable market price is available for a specific instrument, we check the fairness of the price by using relevant market data and, where possible, by making a comparison with similar or comparable products. Our monitoring also includes exception-based controls, with results reviewed by mid-office and front office staff and are subject to periodic compliance monitoring.

(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

