

Summary report as per Delegated Regulation no 2017/576 for AS SEB banka

Year: 2019

Instrument class: Currency Derivatives

Execution factors

The execution factors indicated below in the order of relative priority which was typically given to them. A variety of criteria in relation to the circumstances of each specific transaction was taken into account in assessing their prioritization:

- Price was normally the most important factor, but it depended on each of the market risk, SEB's exposure to similar instruments and the regulatory capital requirements that it must comply with;
- Transaction costs and risks relevant to the execution;
- Speed of execution and Likelihood of execution (potentially more important than price in an illiquid market);
- Size and nature of the order;
- The nature of the market for the financial instrument;
- Any other consideration deemed relevant to the execution of an order.

In order to determine the relative importance of the execution factors, AS SEB banka also did take into account the following characteristics:

- The client, including its categorization and counterparty risk according to SEB's internal risk scoring of clients;
- The circumstances behind the client's order (e.g. whether it has issued an RFQ);
- The financial instruments that are the subject of the client order (the liquidity for the relevant instrument).

Venues

AS SEB banka did not offer agency trading in FX and therefore all FX business was executed against AS SEB banka as principal to the trades.

AS SEB banka also used external execution venues to source accurate and timely price updates which reflected SEB's pricing.

No conflicts of interest due to close links or common ownership exist for the execution venues.

No specific arrangements exist with regards to payments made or received, discounts, rebates or non-monetary benefits received for the execution venues.

No change was made in the list of execution venues during previous year.

AS SEB banka does not use any data or tools relating to the quality of execution, including any data published under Delegated Regulation (EU) 2017/575

Clients

All clients trading with AS SEB banka received pricing based on the same underlying market price. AS SEB banka did not use client categorization to affect the underlying FX price that was offered to the clients.