

Summary of the analysis, based on the execution quality monitoring, valid for all instrument types

This analysis summarizes the conclusions, made with regard to the execution of client orders and deals in financial instruments for Y2019.

United Bulgarian Bank AD /UBB AD/, in its capacity as an investment intermediary publishes on an annual basis information containing the top five execution venues for client orders, as per the provisions of Art. 3 of Commission Delegated Regulation (EU) 2017/576.

General Information

Client orders are being executed mainly on a regulated market or OTC.

Orders for financial instruments, admitted for trading on a regulated market - the Bulgarian Stock Exchange AD - are being executed directly by United Bulgarian Bank AD as per the Regulations on the Activity of the Bulgarian Stock Exchange AD.

As regards the trade in OTC-traded financial instruments, UBB AD is counterparty under each individual deal and execution venue, for all orders.

We should note that the indicated information does not include data about deals with eligible counterparties.

Instrument classes, included in the analysis:

- Equity Instruments – Shares;
- Debt Instruments - government securities and bonds;
- FX Derivatives.
- Exchange-traded products (exchange-traded funds etc.)

Classification of orders, included in the analysis:

- Passive order – entered in the Journal of Orders, that has ensured liquidity
- Aggressive order – entered in the Journal of Orders, which has withdrawn liquidity
- Direct order – upon which a particular execution venue is being determined by the client prior to the execution.

A. Explanation of the relative meaning, attributed to the execution by the intermediary, such as price, expenses, speed, order execution probability or any other consideration, including qualitative factors upon execution quality assessment.

UBB applies an Orders Handling Policy and a Best Execution Policy, which are being revised on a regular basis.

For the purpose of achieving best execution of client orders UBB AD assesses the relative significance of the following factors:

- Price;
- Costs;
- Volume;

- Execution Probability;
- Execution Speed;
- Ensured Settlement;
- Order Type and Nature;
- Other factors, related to order execution.

In most cases UBB places the highest significance to the price and costs factors for the purpose of obtaining the best result for the client.

B. Description of any close relations, conflicts of interest with regard to any of the order execution venues

UBB AD is a member of the Bulgarian Stock Exchange -Sofia AD and holds a certain percentage of its capital. UBB AD does not have other close relations and conflicts of interest, nor co-ownership with regard to any of the order execution venues. UBB AD ensures the lack of discrimination between the execution venues, which differ from the execution factors, pertaining to the particular order or instruction.

C. Description of any special arrangements with all execution venues with regard to the made or received payments, discounts, rebates or received non-financial benefits

UBB AD does not apply any special arrangements with the various execution venues with regard to the made or received payments, discounts, rebates or received non-financial benefits.

D. Description of the factors, which have triggered a change in the list of execution venues, included in the intermediary's execution policy, if such change has occurred

Over the reviewed period there are no new factors available, which have triggered a change in the list of execution venues, included in UBB AD's execution policy

E. Explanation as to how the execution manner differs depending on a client's category, in the cases when the intermediary treats the categories of clients in a different way and when this may impact the order execution arrangements

All clients of UBB AD are being treated equally, regardless of their categorization.

F. Explanation as to whether other criteria have been preferred to the immediate price and costs upon execution of orders of retail clients and how those other criteria have impacted the ensuring of the best possible result with regard to the total expenses for the client

As noted above, UBB AD uses first and foremost price and cost factors upon defining the execution venue. In certain cases, as for example with non-liquid financial instruments or orders, exceeding the average market volumes, other factors, such as execution probability and speed may exert larger impact on the choice of an execution venue.

G. Explanation as to the manner, in which UBB AD uses all data or means, related to the execution quality, including all data, published in Commission Delegated Regulation (EU) 2017/575

UBB does not have specialized systems with regard to the execution of listed equity instruments.

H. Where applicable, description of the manner, in which the investment intermediary has used the results of a consolidated data provider, established in compliance with Article 65 of Directive 2014/65/EU

It has not been applied in the Bank's activity

The top 5 execution venues in Y2019 for retail clients						
Instrument class		(a) Equity Instruments: Shares				
Notification, if there are < 1 average deals per business day during the previous year		NO				
The top five execution venues, ranked based on the traded volumes (in descending order)		Share of traded volume as a percentage of the total for the particular class	Share of executed orders as a percentage of the total for the particular class	Passive orders' percentage	Aggressive orders' percentage	Direct orders' percentage
XBUL/ BSE Sofia		100.00%	100.00%	96.26%	3.74%	100.00%
Instrument class		(B) Debt Instruments; Government securities and bonds				
Notification, if there are < 1 average deals per business day during the previous year		YES				
The top five execution venues, ranked based on the traded volumes (in descending order)		Share of traded volume as a percentage of the total for the particular class	Share of executed orders as a percentage of the total for the particular class	Passive orders' percentage	Aggressive orders' percentage	Direct orders' percentage
UNITED BULGARIAN BANK AD (5299000PCY1EP8QJFV48)		100.00%	100.00%	0.00%	100.00%	0.00%
Instrument class		(d) FX Derivatives				
Notification, if there are < 1 average deals per business day during the previous year		NO				
The top five execution venues, ranked based on the traded volumes (in descending order)		Share of traded volume as a percentage of the total for the particular class	Share of executed orders as a percentage of the total for the particular class	Passive orders' percentage	Aggressive orders' percentage	Direct orders' percentage
UNITED BULGARIAN BANK AD (5299000PCY1EP8QJFV48)		100.00%	100.00%	0.00%	100.00%	0.00%
Instrument class		(k) Exchange-traded products (exchange-traded funds, exchange-traded bonds and				
Notification, if there are < 1 average deals per business day during the previous year		YES				
The top five execution venues, ranked based on the traded volumes (in descending order)		Share of traded volume as a percentage of the total for the particular class	Share of executed orders as a percentage of the total for the particular class	Passive orders' percentage	Aggressive orders' percentage	Direct orders' percentage
XBUL/ BSE Sofia		100.00%	100.00%	85.71%	14.29%	100.00%

The top 5 execution venues for client orders in Y2019 with regard to professional clients

The top 5 execution venues for client orders in Y2019 with regard to professional clients						
Instrument class		(a) Equity Instruments: Shares				
Notification, if there are < 1 average deals per business day during the previous year		YES				
The top five execution venues, ranked based on the traded volumes (in descending order)		Share of traded volume as a percentage of the total for the particular class	Share of executed orders as a percentage of the total for the particular class	Passive orders' percentage	Aggressive orders' percentage	Direct orders' percentage
XBUL/ BSE Sofia		100.00%	100.00%	55.88%	44.12%	100.00%
Instrument class		(B) Debt Instruments; Government securities and bonds				
Notification, if there are < 1 average deals per business day during the previous year		YES				
The top five execution venues, ranked based on the traded volumes (in descending order)		Share of traded volume as a percentage of the total for the particular class	Share of executed orders as a percentage of the total for the particular class	Passive orders' percentage	Aggressive orders' percentage	Direct orders' percentage
UNITED BULGARIAN BANK AD (5299000PCY1EP8QJFV48)		100.00%	100.00%	0.00%	100.00%	0.00%
Instrument class		(d) FX Derivatives				
Notification, if there are < 1 average deals per business day during the previous year		NO				
The top five execution venues, ranked based on the traded volumes (in descending order)		Share of traded volume as a percentage of the total for the particular class	Share of executed orders as a percentage of the total for the particular class	Passive orders' percentage	Aggressive orders' percentage	Direct orders' percentage
UNITED BULGARIAN BANK AD (5299000PCY1EP8QJFV48)		100.00%	100.00%	0.00%	100.00%	0.00%