

Wells Fargo Securities Europe (WFSE)

RTS 28: Top Five Execution Venue Reporting

Note: WFSE is required by MiFID II to publish certain information regarding the identity of execution venues and execution quality through an RTS 28 report. Whilst WFSE has made reasonable efforts to ensure the data in the report is accurate, it does not represent or guarantee that the data in the report is wholly accurate or complete. WFSE reserves the right to update and amend data in the report. WFSE disclaims any and all liability for any loss or damage in connection with use of or reliance on the data in the report.

Due to the WFSE business model, WFSE has excluded RTS 28, Table 1 and 3 from each class of financial instrument to be reported. WFSE does not serve retail clients in-region, thus reporting for Table 1 is not applicable. Additionally, WFSE does not conduct any Securities Financing Transaction (SFT) activity with professional clients in circumstances that it owes a best execution obligation to such clients. Accordingly, Annex II, Table 3 of RTS 28 shall not be populated.

(a) Equities – Shares & Depositary Receipts

- (i) Tick size liquidity bands 5 and 6 (from >2000 trades per day)**
- (ii) Tick size liquidity bands 3 and 4 (from 80 to 1999 trades per day)**
- (iii) Tick size liquidity bands 1 and 2 (from 0 to 79 trades per day)**

WFSE does not have transactions that fit the tick size liquidity bands that are appropriate for this asset class. However please see asset class (m) below for transactions in US shares.

(b) Debt instruments

(i) Bonds

Debt Instruments (Bonds) Summary

Investment firms shall publish for each class of financial instruments, a summary of the analysis and conclusions they draw from their detailed monitoring of the quality of execution obtained on the execution venues where they executed all client orders in the previous year. The information shall include:

- (a) an 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

Price is prioritized unless the customer instructs otherwise, followed by size, completion of order, and any instructions stipulated by the client.

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

For debt instruments, WFSE only uses itself as an execution venue.

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

Not Applicable.

(d) an 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

No such changes of venue occurred.

(e) an 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

Best execution is only provided to Professional Clients (PC).

(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 in terms of the total consideration to the client

Not Applicable - Wells Fargo does not transact with clients classified as Retail Clients in region.

(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

Wells Fargo performs periodic analysis to assess the quality of individual order execution which may include the use of transaction cost analysis tools provided by an external vendor.

(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

Not Applicable.

(ii) Money Markets Instruments

Investment firms shall publish for each class of financial instruments, a summary of the analysis and conclusions they draw from their detailed monitoring of the quality of execution obtained on the execution venues where they executed all client orders in the previous year. The information shall include:

(a) an 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

Price is prioritized unless the customer instructs otherwise, followed by size, completion of order, and any instructions stipulated by the client.

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

For debt instruments, WFSE only uses itself as an execution venue.

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

Not Applicable.

(d) an 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

No such changes of venue occurred.

- (e) an 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

Best execution is only provided to Professional Clients (PC).

- (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 in terms of the total consideration to the client

Not Applicable - Wells Fargo does not transact with clients classified as Retail Clients in region.

- (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

Wells Fargo performs periodic analysis to assess the quality of individual order execution which may include the use of transaction cost analysis tools provided by an external vendor.

- (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

Not Applicable.

(c) Interest rates derivatives

(i) Futures and Options admitted to trading on a trading venue

WFSE does not owe Best Execution in this asset class or set of instruments based on its policy or that there were no transactions in this asset class or instruments.

(ii) Swaps, Forwards, and Other Interest Rates Derivatives

WFSE does not owe Best Execution in this asset class or set of instruments based on its policy or that there were no transactions in this asset class or instruments.

(d) Credit derivatives

(i) Futures and options admitted to trading on a trading venue

WFSE does not owe Best Execution in this asset class or set of instruments based on its policy or that there were no transactions in this asset class or instruments.

(ii) Other credit derivatives

WFSE does not owe Best Execution in this asset class or set of instruments based on its policy or that there were no transactions in this asset class or instruments.

(e) Currency derivatives

(i) Futures and Options admitted to trading on a trading venue

WFSE does not owe Best Execution in this asset class or set of instruments based on its policy or that there were no transactions in this asset class or instruments

(ii) Swaps, forwards, and other currency derivatives

WFSE does not owe Best Execution in this asset class or set of instruments based on its policy or that there were no transactions in this asset class or instruments.

(f) Structured finance instruments

WFSE does not owe Best Execution in this asset class or set of instruments based on its policy or that there were no transactions in this asset class or instruments.

(g) Equity Derivatives

(i) Options and Futures admitted to trading on a trading venue

WFSE does not owe Best Execution in this asset class or set of instruments based on its policy or that there were no transactions in this asset class or instruments.

(ii) Swaps and Other Equity Derivatives

WFSE does not owe Best Execution in this asset class or set of instruments based on its policy or that there were no transactions in this asset class or instruments.

(h) Securitized Derivatives

(i) Warrants and Certificate Derivatives

(ii) Other securitized derivatives

WFSE does not owe Best Execution in this asset class or set of instruments based on its policy or that there were no transactions in this asset class or instruments.

(i) Commodities derivatives and emission allowances Derivatives

(i) Options and Futures admitted to trading on a trading venue

WFSE does not owe Best Execution in this asset class or set of instruments based on its policy or that there were no transactions in this asset class or instruments.

(ii) Other commodities derivatives and emission allowances derivatives

WFSE does not owe Best Execution in this asset class or set of instruments based on its policy or that there were no transactions in this asset class or instruments.

(j) Contracts for difference

WFSE does not owe Best Execution in this asset class or set of instruments based on its policy or that there were no transactions in this asset class or instruments.

(k) Exchange traded products (Exchange traded funds, exchange traded notes and exchange traded commodities)

WFSE does not owe Best Execution in this asset class or set of instruments based on its policy or that there were no transactions in this asset class or instruments.

(l) Emission allowances

WFSE does not owe Best Execution in this asset class or set of instruments based on its policy or that there were no transactions in this asset class or instruments.

(m) Other Instruments

(i) Equities – Shares, Exchange Traded Funds and Depository Receipts Traded in the US

The below represents United States equities tradeable in the United States transacted on behalf of WFSE clients.

Investment firms shall publish for each class of financial instruments, a summary of the analysis and conclusions they draw from their detailed monitoring of the quality of execution obtained on the execution venues where they executed all client orders in the previous year. The information shall include:

- (a) an 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

Price is prioritized unless the customer instructs otherwise, followed by size, completion of order, and any instructions stipulated by the client.

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

Client orders are placed onto various US national markets, ATS and OTC venues via a USA affiliate, WFS LLC. WFS LLC is also an OTC execution venue. WFSE does not have any close links, conflicts or common ownership with any other execution venues. Execution quality received from an affiliated entity is subject to monitoring and assessment under local regulations.

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

WFSE currently has no arrangements of this sort. However, client orders are placed onto various US national markets, ATS and OTC venues via a USA affiliate who routes client orders to national securities exchanges, alternative trading systems, including electronic communications networks and other market centers (including other broker-dealers), some of which provide the affiliate with rebates for adding liquidity and charges for removing liquidity.

(d) an 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

No changes to the execution policy.

(e) an 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

Best Execution is only provided to Professional Clients (PC).

(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 in terms of the total consideration to the client

Not Applicable - Wells Fargo does not transact with clients classified as Retail Clients in region.

(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

Equities executed in the USA on US national markets, ATS and OTC, are subject to FINRA rules. USA execution venues do not publish RTS 27 however WFSE performs periodic analysis to assess the quality of order execution which may include the use of transaction cost analysis tools provided by an external vendor.

(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

Not Applicable.