

StoneX Financial Europe S.A.

## Top 5 Execution Venues Report

Financial year ending 30 September 2022

12-20-2022

## 1. Purpose of this Report

Following implementation of the Markets in Financial Instruments Directive (MiFID II) in 2018, investment firms are required to publish their Top 5 Execution Venues in terms of trading volumes (value of trades) and number of trades per Class of Financial Instruments on an annual basis.

This Report on the Top 5 Execution Venues (hereafter as “Top 5 Report”) describes the approach of StoneX Financial Europe S.A. (hereafter as “SFE”, “we”, or “us”) in identifying the Execution Venues with whom orders have been executed or the parties to which orders have been transmitted for execution respectively on behalf of clients.

This Top 5 Report is linked to the Execution Policy of StoneX Financial Europe S.A. (hereafter “Policy”; available on StoneX website<sup>1</sup>). All publications follow the recent developments and disclosure requirements of relevant law by applying the standards of the Markets in Financial Instruments Directive 2014/65/EU (hereafter “MiFID II”). More specifically, this (asset class specific) Top 5 Report refers to the obligations set out in art. 27.6 of MiFID II, art. 65.6 of the Commission Delegated Regulation (EU) 2017/565 and art. 3.1 and 3.2 of Commission Delegated Regulation (EU) 2017/576 (“RTS 28”).

This Report intends to cover the period from 01/10/2021 to 30/09/2022. As outlined in ESMA’s Q&A on MiFID II and MiFIR investor protection topics, certain aspects of the RTS 28 requirements are tied to new provisions from MiFID II or MiFIR.

For clients serviced by StoneX legal entities other than SFE, please note that there might be separate Top 5 Reports which disclose the transmission and execution details obtained of those legal entities. Please contact your relationship manager for further information.

## 2. Scope and Categorisations

Along with being a member of various regulated markets and exchanges globally, SFE has access to a range of other execution venues (including multilateral trading facilities, systematic internalisers, market makers and other liquidity providers) for the execution of client orders.

In the financial year 2022, our client orders related to transactions in the following classes of financial instruments: commodities derivatives, currency derivatives, equities (shares and exchange traded funds), bonds, money market instruments and interest rate derivatives. The information on the top five execution venues, for each class of financial instruments, is set out in the Schedule below.

Transactions where SFE acts in name passing capacity (currency derivatives, money market instruments and interest rate derivatives) - where all counterparties to a transaction settle directly with each other or through a settlement agent - have not been included in the scope of this report. The role of a name passing broker is to provide quotes on request to counterparties in order that such counterparties may enter into a bilateral contract with each other. Therefore, as name passing brokers does not ‘execute’ transactions, or receive and transmit orders for execution, we understand that Best Execution is not applicable in these markets.

In addition, this report does not contain information on trades concluded in wholesale OTC derivatives and bond markets. We believe in these transactions buyers and sellers compare by

---

<sup>1</sup> [www.stonex.com/Account-Forms/](http://www.stonex.com/Account-Forms/)

approaching several dealers for a quote, and in these circumstances, there is no expectation between the parties that the dealer chosen by the client will owe best execution.

We do not offer our services to retail clients. Our clients are categorised as either professional clients or eligible counterparties. As such, the information on top five execution venues (in the report below) has been compiled and published in accordance with the prescribed format, as set out in Annex II of the Delegated Regulation and accounts for executions with clients owed best execution, as per Question 12 of the European Securities and Markets Authority's (ESMA) Questions and Answers on MiFID II and MIFIR investor protection and intermediaries' topics. Most of our clients' orders has been categorised as 'Directed Orders', because such orders relate to specific execution venues specified by the clients prior to the execution.

### 3. Execution Reports

Class of Instrument				Equities - Shares		
<b>Notification if &lt;1 average trade per business day in the previous year</b>				No		
<b>Top five execution venues ranked in terms of trading volumes (descending order)</b>		Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Macquarie Capital Europe Ltd - 549300GX4FPMFF91RJ37	-	49.28%	22.49%	Not available	Not available	0%
StoneX Financial Limited - 549300AWF3TOHRYL7754	-	47.37%	3.67%	Not available	Not available	0%
Morgan Stanley Co LLC - 9R7GPTSO7KV3UQJZQ078	-	3.29%	60.45%	Not available	Not available	0%
StoneX Financial Inc. - 549300LNKU6K5TJCRG93	-	0.02%	6.70%	Not available	Not available	0%
DRW Europe B.V. - 5493005Q760M4WJ8ZP07	-	0.01%	1.44%	Not available	Not available	0%

Class of Instrument				Exchange Traded Commodity Derivatives (Agricultural Products) – Options and Futures		
<b>Notification if &lt;1 average trade per business day in the previous year</b>				No		
<b>Top five execution venues ranked in terms of trading volumes (descending order)</b>		Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
EURONEXT Paris S.A. (XMAT) - 969500HMVSZ0TCV65D58	-	97.14%	96.49%	Not available	Not available	100%
European Energy Exchange AG (XEER) - 529900J0JGLSFDWNFC20	-	2.86%	3.51%	Not available	Not available	100%

## RECEIVER/TRANSMITTER

Class of Instrument				Exchange Traded Commodity Derivatives (Agricultural Products) – Options and Futures				
<b>Notification if &lt;1 average trade per business day in the previous year</b>				No				
<b>Top five execution venues ranked in terms of trading volumes (descending order)</b>				Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
StoneX	Financial	Inc.	-	26.58%	21.78%	Not available	Not available	100%
549300LNKU6K5TJCRG93								
StoneX	Financial	Limited	-	6.57%	2.13%	Not available	Not available	100%
549300AWF3TOHRYL7754								
StoneX	Financial	Pte. Ltd.	-	2.42%	1.77%	Not available	Not available	100%
984500C5005644B14P13								

Execution on the following markets – Chicago Board of Trade (XCBT), Chicago Mercantile Exchange (XCME), Ice Futures Europe (IFEU), Ice Futures U.S (IFUS), Singapore Commodity Exchange (XSCE).

Class of Instrument				Exchange Traded Commodity Derivatives (Metals) – Options and Futures				
<b>Notification if &lt;1 average trade per business day in the previous year</b>				No				
<b>Top five execution venues ranked in terms of trading volumes (descending order)</b>				Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
StoneX	Financial	Limited	-	100%	100%	Not available	Not available	100%
549300AWF3TOHRYL7754								

Execution on the following markets – London Metals Exchange (LME).

## 4. Analysis and Conclusions

### *Relative Significance of execution factors*

In seeking to achieve the best result for clients in 2022, SFE has considered, for each class of financial instruments, the following execution factors when selecting a trading venue: available price in the market; transaction costs (including commission and execution, clearing and settlement costs); speed of execution; likelihood of execution and settlement; as well as the size and nature of the transaction. To determine the relative significance of these execution factors, SFE has considered the following criteria:

- characteristics of the client (i.e., whether the client is a professional client or an eligible counterparty);
- characteristics of the client orders (e.g., directed orders, limit orders, or stop-loss orders);
- characteristics of the financial instrument; and
- characteristics of the execution venues to which the orders have been directed.

## *No Close Links, Conflicts of Interest, or Common Ownership with Respect to External Execution Venues*

SFE does not have any close links, conflicts of interest or common ownership with respect to any external execution venues. While SFE has also executed client orders with other entities within StoneX Group, such group entities are treated by SFE as counterparties and therefore we would not consider transactions with the group entities as an internal execution.

## *No Specific Arrangements with Execution Venues*

SFE is prohibited, respectively under its Execution Policy and Conflicts of Interest Policy, from receiving any remuneration, discount or non-monetary benefit as an inducement for routing orders to a particular execution venue. Any such arrangements would give rise to conflicts of interest and would undermine SFE's ability to achieve the most favorable terms for the client. SFE is committed to taking sufficient steps to manage any conflicts of interest and to obtain the best results for clients.

## *List of Execution Venues*

Other than amendments to the regulatory status of certain execution venues (in light of MiFID II), there have been no factors that led to changes to the list of execution venues (in respect of any classes of financial instruments) in our Execution Policy. For more information, please refer to our Execution Policy.

## *Order Execution: Client Categorisation*

We are under no obligation to comply with the requirements of best execution, where clients have agreed to be categorised as an eligible counterparty. However, whilst our Execution Policy only applies to professional clients, we have used our best endeavors to obtain the best result for both professional clients and eligible counterparties, taking into account the relative significance of the execution factors detailed above.

## *Monitoring Tools: Quality of Execution*

We are currently in the process of reviewing our arrangements to monitor compliance with our best execution policy, with the aim to make this more effective.

If you have any enquiries or would like further information on our Execution Policy, please contact StoneX Financial Europe S.A. Compliance team at [SFE.Compliance@StoneX.com](mailto:SFE.Compliance@StoneX.com).