

# BEST EXECUTION REPORT

BANKINTER LUXEMBOURG S.A.

March 2025

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## I. Introduction

In compliance with the Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments, the Commission Delegated Regulation (EU) 2017/565 of 25 April 2016 supplementing the Directive 2014/65/EU as regards to organisational requirements and operating conditions for investment firms and define terms for the purpose of that Directive, the Commission Delegated Regulation (EU) 2017/576 of 8 June 2016 with regard to regulatory technical standards for the annual publication by investment firms of information on the identity of execution venues and on the quality of the execution ("RTS28"), as well as ESMA Guidelines and Questions & Answers, Bankinter Luxembourg S.A. (hereinafter referred as "Bankinter" or "Bank") publishes its Best Execution Report.

The purpose of this Report is to enable investors to evaluate the quality of Bankinter Luxembourg S.A. execution practices and, to identify the top five intermediaries (brokers) in terms of, trading volumes per class of financial instruments, as well as allow them to assess the effectiveness of the monitoring carried out in relation to those intermediaries (brokers).

The information contained in this document refers to the period between 01.01.2024 and 31.12.2024.

## II. Information related to the Top Five Intermediaries (brokers) in terms of Trading Volumes

As per the articles 3(1), 4 and Annex II, Tables 1 and 2 of the Commission Delegated Regulation (EU) 2017/576 of 8 June 2016, Bankinter Luxembourg S.A. presents the information related to the Top Five Intermediaries (brokers) in terms of trading values, duly segregated by Retail and Professional customers.

### II.I Retail Customers

Class of instrument			EQUITIES		
Notification if <1 average trade per business day in the previous year			N		
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage total in that class	Proportion of orders traded as a percentage total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of direct orders
Citibank Global Markets Europe AG (LEI: 6TJCK1B7E7UTXP528Y04)	71.41	81.42	11.29	88.71	---
Bankinter S.A. (LEI: VWMYAEQSTOPNV0SUGU82)	28.59	18.58	12.23	87.77	---
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Class of instrument			DEBT INSTRUMENTS (BONDS)		
Notification if <1 average trade per business day in the previous year			N		
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage total in that class	Proportion of orders traded as a percentage total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of direct orders
Bankinter S.A. (LEI: VWMYAEQSTOPNVOSUGU82)	69.78	77.79	6.13	93.87	---
A&G Banco, S.A. (LEI: 959800QKRKCC19MR2G52)	30.18	21.91	20.41	79.59	---
Citibank Global Markets Europe AG (LEI: 6TJCK1B7E7UTXP528Y04)	0.04	0.30	50.00	50.00	---
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Class of instrument			ETFs		
Notification if <1 average trade per business day in the previous year			N		
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage total in that class	Proportion of orders traded as a percentage total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of direct orders
Citibank Global Markets Europe AG (LEI: 6TJCK1B7E7UTXP528Y04)	100.00	100.00	0.90	99.10	---
Bankinter S.A. (LEI: VWMYAEQSTOPNVOSUGU82)	0.00	0.00	0.00	0.00	---
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## II. II Professional Customers

Class of instrument			EQUITIES		
Notification if <1 average trade per business day in the previous year			N		
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage total in that class	Proportion of orders traded as a percentage total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of direct orders
Citibank Global Markets Europe AG (LEI: 6TJCK1B7E7UTXP528Y04)	58.61	85.87	0.94	99.06	---
Bankinter S.A. (LEI: VWMYAEQSTOPNVOSUGU82)	41.39	14.13	13.33	86.67	---
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Class of instrument			DEBT INSTRUMENTS (BONDS)		
Notification if <1 average trade per business day in the previous year			N		
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage total in that class	Proportion of orders traded as a percentage total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of direct orders
Bankinter S.A. (LEI: VWMYAEQSTOPNVOSUGU82)	83.90	77.04	9.68	90.32	---
A&G Banco, S.A. (LEI: 959800QKRKCC19MR2G52)	15.96	22.67	14.56	85.44	---
Citibank Global Markets Europe AG (LEI: 6TJCK1B7E7UTXP528Y04)	0.14	0.29	0.00	100.00	---
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Class of instrument			ETFs		
Notification if <1 average trade per business day in the previous year			N		
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage total in that class	Proportion of orders traded as a percentage total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of direct orders
Citibank Global Markets Europe AG (LEI: 6TJCK1B7E7UTXP528Y04)	100.00	100.00	0.85	99.15	---
Bankinter S.A. (LEI: VWMYAEQSTOPNVOSUGU82)	0.00	0.00	0.00	0.00	---
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### III. Information on the Quality of the Execution obtained per class of financial instrument

The Best Execution Policy of Bankinter Luxembourg S.A. (hereinafter referred as "Policy") describes the measures taken by the Bank, to obtain the best possible result for its customers, when placing or transmitting their orders to the selected intermediaries (brokers) for final execution. For achieving the best possible result for its Customers, Bankinter Luxembourg S.A. and its selected intermediaries (brokers), takes into consideration some of the following factors: price, liquidity, execution costs, speed and probability of execution and settlement, amount to trade and nature of the transaction.

This being said, and, taking into consideration the abovementioned legal and regulatory framework, Bankinter has performed a quality assessment of the traffic sent to its intermediaries (brokers) on the following financial instruments subject to reporting.

#### a. Equities

Bankinter Luxembourg S.A. (the Bank), as stated on its Best Execution Policy, identifies the above-mentioned factors as the key variables to be considered by its designated intermediaries (brokers) when executing equity related transactions on Pan-European, North American and Asia-Pacific exchanges and/or venues.

Bank's intermediaries (brokers) for 2024 continue to be divided on access providers for Spanish related equities and, for the rest of exchanges (*excluding Spanish related equities*). Bankinter S.A. and Citigroup Global Markets Europe AG, were the two designated intermediaries for this business respectively.

During 2024, the Bank did not perform any changes on its intermediaries (brokers) selected list.

The Bank did not apply specific execution factors based on the customer categorization. Moreover, the majority of Bankinter clients are classified as retail customers.

Most of the Bank transactions dealt during 2024 had a relatively low size (*cash amount basis*) versus the daily turnover of the underlying product. Taking that into consideration, the price and likelihood of execution and settlement, were prioritized over other factors such as volume or size.

The Bank, as pure transmitter of transactions to its intermediaries (brokers), did not held or identifies any conflict of interest whatsoever, that could have affected the proper transaction flow chain. Consequently, the Bank did not interfere on the actions performed by the intermediary itself, nor on its internal execution processes, hence on the execution price delivered to its customers.

The Bank has an agreed commission scheme with its intermediaries (brokers) that clearly identify the costs imbedded for each transaction dealt on the Bank's behalf. Such commission scheme is tailor-made per execution country. It is understandable that countries with more liquid markets than others will consequently have more competitive rates than those illiquid ones. On those grounds, intermediaries set forth their commission structures.

The Bank has no arrangements in place with the intermediaries (brokers) used for the execution of client orders. No payments, discounts, rebates, or non-monetary benefits have been received.

In addition, the relationship that the Bank has with its intermediaries (brokers) is directly related to the relationship with its custodians. The Bank has custody agreements with Bankinter S.A. and Citibank International Luxembourg S.A.

Bearing that in mind, the Best Execution factor related to the likelihood of settlements, is fully covered on an STP ("Straight Through Processing") basis, reducing the chances of an unsettled situation to a minimum which in the end reduces the costs and, charges/penalties related to any buyback or short-sell situation.

Most of the Bank transactions were dealt on a DMA ("Direct Market Access") basis. Hence, selected intermediaries (brokers) applied their own Best Execution Algorithms, which mostly implied to prioritize price and costs. For those Bank transactions that were not treated on a DMA basis, the liquidity had a leading role followed by price and the rest of factors outlined above.

As the Bank does not act as an intermediary (brokers) as such, the access to consolidated tape information is not available. The Bank does not have any automated interface to use and, treat this type of information nor the capability or the need to do so.

#### **b. Debt Instruments – Bonds**

Referring to the Best Execution Policy and bearing in mind that the Debt Instruments activity it is based on a bilateral approach, where transactions happen on a quote and trade basis, the factors that were key for the previous point, equities, slightly differ. Notably, speed and probability of execution and settlement, execution costs, among others.

Bankinter Luxembourg S.A. (the Bank) intermediaries (brokers) for 2024 were split on, primary access Bankinter S.A. and A&G Banco S.A., while Citigroup Global Markets Europe AG remained on a secondary level.

During 2024, the Bank did not perform any changes on its intermediaries (brokers) selected list.

The Bank does not apply specific execution factors based on the customer categorization. Moreover, the majority of Bankinter clients are classified as retail customers.

During 2024 the number of transactions performed by our intermediaries (brokers) kept on increasing. Those transactions still had a relatively low size (nominal amount), versus the daily turnover of the underlying product. Taking this into account, the price and liquidity were prioritized over other factors such as, speed of execution.

The Bank, as pure transmitter of transactions to its intermediaries (brokers), did not held or identified any conflict of interest whatsoever, that could have affected the proper transaction flow chain.

Consequently, the Bank did not interfere on the actions, performed by the intermediary itself, nor on its internal execution processes, hence on the execution price delivered to its customers.

Costs imbedded on debt instruments (bonds) transactions related to intermediaries (brokers) are included on the transaction gross price (implicit margin). No commission scheme from intermediaries (brokers) were applied to this type of transactions. Depending on the liquidity of the debt instrument (bonds), the margin applied by the intermediaries (brokers) may differ.

The Bank has no arrangements in place with the intermediaries (brokers) used for the execution of client orders. No payments, discounts, rebates, or non-monetary benefits have been received.

In addition, the relationship that the Bank has with its intermediaries (brokers) and its custodians is key on keeping late settlement situations to a minimum. On those grounds, the Bank centralises custody and settlement on two entities Bankinter S.A. and, Citibank International Luxembourg S.A. For those transactions executed through A&G a strong communication flow with custodians allows us to maintain late settlement situation close to zero.

As stated at the beginning of point b., transactions on debt instruments (bonds) are bilateral. No STP ("Straight through Processing"), nor DMA ("Direct Market Access") processes are applicable. All transactions had to be dealt through the dealing desks of each of the mentioned intermediaries (brokers), on a trade-by-trade basis.

As the Bank does not act as an intermediary (brokers) as such, the access to consolidated tape information is not available. The Bank does not have any automated interface to use and treat this type of information nor the capability or the need to do so.

#### **c. Exchange Traded Products (ETFs)**

For Exchanged traded products (Exchange traded funds, exchange traded notes and exchange traded commodities) the assumptions made on point a. above, are fully applicable for this type of financial instruments.

## **IV. Conclusions**

Based on the monitoring performed by Bankinter Luxembourg S.A. (the Bank) of its intermediaries (brokers), on the quality of the execution, and the close to zero un-settle situations occurred during the reporting period, the Bank concludes that, the relationship with the mentioned intermediaries (brokers), is fully compliant with the Best Execution principles of the Bank.