



### Northlander Commodity Advisors LLP – RTS 28 Report for the calendar year 2020

Article 3(3) of Regulatory Technical Standard 28 (“RTS 28”) came into force in January 2018 as a supplement to Directive 2014/65/EU in financial instruments (“MiFID II”). RTS 28 requires MiFID investment firms, such as Northlander, who execute client orders to summarise and make public on an annual basis, for each class of financial instruments, the top five execution venues in terms of trading volumes where they executed client orders in the preceding year and information on the quality of execution obtained.<sup>1</sup>

The table below provides the information required under RTS 28 and summarises the analysis and conclusions drawn from our detailed monitoring of the quality of execution obtained on all client orders in 2020.

Requirement under Article 3(3)	Responses
(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;	<p>We consider which option provides the best result for our clients when deciding whether to use a broker to execute an order (on transmission of the order by us) or whether we use Direct Market Access and execute the order directly ourselves. The decision made will be unique depending on the financial instrument and the relative importance of the execution factors and execution criteria.</p> <p>We ordinarily treat price, followed by cost as the highest priority execution factor to differentiate between execution venues and brokers. However, if we believe there is reduced likelihood of successful execution or settlement through a particular venue or broker, we avoid trading through that venue/broker. In addition, if there is rapid price movement in a particular financial instrument and delay would be likely to disadvantage the client, we treat speed as the priority factor.</p>
(b) a description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders;	We do not have any close links, conflicts of interest or common ownerships with respect to any execution venues used to execute orders
(c) a description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received;	We do not have any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received.

<sup>1</sup> The exact requirements are detailed within [COBS 11 Annex 1](#) EU Regulatory Technical Standard 28 (RTS 28) within the FCA Handbook.

<p>(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;</p>	<p>There were no changes to the list of execution venues within our Execution Policy during 2020.</p>
<p>(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;</p>	<p>All our clients are treated the same under our execution policy.</p>
<p>(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;</p>	<p>N/A. We do not execute retail client orders.</p>
<p>(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 Delegated Regulation (EU) 2017/575 [RTS 27];</p>	<p>We use RTS 27 Quality of Execution reports, where published by the executing brokers, and other sources to assess whether the brokers we use continue to provide quality of execution in line with our Execution Policy.</p> <p>We regularly assess the Direct Market Access execution venues and brokers available for different types of financial instruments and may add or remove venues and brokers, as required, to ensure the continued best execution for our Clients. When assessing brokers, we review the performance of their execution services and their ability to trade effectively.</p>
<p>(h) where applicable, an explanation of how the investment firm has used output of a consolidated tape provider.</p>	<p>N/A</p>

### RTS 20 – Top 5 Exchanges

Class of Instrument		Commodities Derivatives and Emission Allowances Derivatives				
Notification if <1 average trade per business day in the previous year (Y/N)		N				
Top five execution venues ranked in terms of trading volumes (descending order)		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
1	ICE Futures Europe <i>LEI: 549300UF4R84F48NCH34</i>	72.40%	62.65%	0.00%	0.00%	0.00%
2	European Energy Exchange AG <i>LEI: 529900J0JGLSFDWNFC20</i>	13.57%	4.26%	0.00%	0.00%	0.00%
3	ICE ENDEX Derivatives B.V. <i>LEI: 549300CZW488L20NT866</i>	0.28%	1.42%	0.00%	0.00%	0.00%
4	NASDAQ OMX Commodities Clearing Company <i>LEI: 5493008EIVLUXMOPQX05</i>	1.00%	0.27%	0.00%	0.00%	0.00%
5	Chicago Mercantile Exchange Inc. <i>LEI: SNZ20JLFK8MNNCLQOF39</i>	0.51%	1.67%	0.00%	0.00%	0.00%

### RTS 20 – Top 5 Brokers

Class of Instrument		Commodities Derivatives and Emission Allowances Derivatives				
Notification if <1 average trade per business day in the previous year (Y/N)		N				
Top five execution venues ranked in terms of trading volumes (descending order)		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
1	Evolution Markets Limited <i>LEI: 213800XUL6949NBPI464</i>	31.94%	32.30%	0.00%	0.00%	0.00%
2	Tullett Prebon (Europe) Limited <i>LEI: 549300MU2MYJLOY6IJ51</i>	29.14%	6.78%	0.00%	0.00%	0.00%
3	Marex Spectron International Limited <i>LEI: 549300FR3U1PB1Y6LV13</i>	17.23%	27.41%	0.00%	0.00%	0.00%
4	ICAP Energy AS <i>LEI: 549300ESJXOUOF7S8014</i>	13.92%	10.64%	0.00%	0.00%	0.00%
5	Marex Spectron Europe Limited <i>LEI: 549300L6UGOLIPH04553</i>	3.04%	3.22%	0.00%	0.00%	0.00%