

# The Top 5 Entities to which client orders were routed 2019



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LYNX exclusively receives and transmits client orders for execution to Interactive Brokers (UK) Limited (hereinafter: Interactive Brokers), established in the UK. This implies that Interactive Brokers serves as single execution venue. LYNX has entered into a contractual agreement with Interactive Brokers to transmit the orders which it receives from its clients to Interactive Brokers because the latter allows LYNX to meet the requirements of best execution in an appropriate and adequate manner. LYNX refers to its order execution policy¹ which states that all orders of clients will be transmitted to Interactive Brokers for execution. Interactive Brokers adheres to its own order execution policy¹ and strives for best execution and thus acting in the best interest(s) of clients. Interactive Brokers makes use of smart order routing. This means that Interactive Brokers determines the order routing and where the order is executed. The order can be executed within the Interactive Brokers group or sent to a party outside the group which is connected to a stock exchange. If you would like to see an overview of where Interactive Brokers executes orders for her clients, we refer you to their website. This overview shows the top five entities that LYNX uses to transmit orders to, which are then executed by Interactive Brokers. LYNX refers to the website of Interactive Brokers for more information regarding the top five of the execution venues Interactive Brokers uses. Their overview will enable clients and the public to evaluate the quality of Interactive Brokers' execution quality and to identify the top five execution venues in terms of trading volumes where Interactive Brokers' executed client orders in the preceding year, Interactive Brokers publishes information in relation to trading venues, market makers or other liquidity providers or any entity that performs a similar function outside the European Economic Area (EEA).

<sup>&</sup>lt;sup>1</sup> This policy is available on the LYNX website via the document center.



# Equities - Shares & Depositary Receipts

CLASS OF INSTRUMENT	<b>EQUITIES - SHARES 8</b>	DEPOSITARY RECEIP	TS: TICK SIZE LIQUIDIT	TY BANDS 5 AND 6	
NOTIFICATION IF <1	N				
AVERAGE TRADE PER					
BUSINESS DAY IN THE					
PREVIOUS YEAR					
TOP FIVE ENTITIES 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 A PERCENTAGE OF TOTAL IN THAT CLASS	PERCENTAGE OF PASSIVE ORDERS	PERCENTAGE OF AGGRESSIVE ORDERS	PERCENTAGE OF DIRECTED ORDERS
IBLLC	100.00%	100.00%	100.00%	0.00%	0.00%
(500BSE5T552106SMZR28)					

CLASS OF INSTRUMENT	<b>EQUITIES - SHARES 8</b>	LEPOSITARY RECEIP	TS: TICK SIZE LIQUIDIT	Y BANDS 3 AND 4	
NOTIFICATION IF <1	N				
AVERAGE TRADE PER					
BUSINESS DAY IN THE					
PREVIOUS YEAR				/	
TOP FIVE ENTITIES	PROPORTION OF	PROPORTION OF	PERCENTAGE OF	PERCENTAGE OF	PERCENTAGE OF
RANKED IN TERMS OF	VOLUME TRADED	ORDERS	PASSIVE ORDERS	AGGRESSIVE	DIRECTED ORDERS
TRADING VOLUMES	AS A PERCENTAGE	EXECUTED AS A		ORDERS	
(DESCENDING ORDER)	OF TOTAL IN THAT	PERCENTAGE OF			
	CLASS	TOTAL IN THAT			
		CLASS			
IBLLC	100.00%	100.00%	100.00%	0.00%	0.00%
(500BSE5T552106SMZR28)					



CLASS OF INSTRUMENT	<b>EQUITIES - SHARES 8</b>	& DEPOSITARY RECEI	PTS: TICK SIZE LIQUIDI	TY BANDS 1 AND 2	
NOTIFICATION IF <1	N				
AVERAGE TRADE PER					
BUSINESS DAY IN THE					
PREVIOUS YEAR					
TOP FIVE ENTITIES	PROPORTION OF	PROPORTION OF	PERCENTAGE OF	PERCENTAGE OF	PERCENTAGE OF
RANKED IN TERMS OF	VOLUME TRADED	ORDERS	PASSIVE ORDERS	AGGRESSIVE	DIRECTED ORDERS
TRADING VOLUMES	AS A PERCENTAGE	EXECUTED AS A		ORDERS	
(DESCENDING ORDER)	OF TOTAL IN THAT	PERCENTAGE OF			
	CLASS	TOTAL IN THAT			
		CLASS			
IBLLC	100.00%	100.00%	100.00%	0.00%	0.00%
(500BSE5T552106SMZR28)					



# Debt Instruments: Bonds

CLASS OF INSTRUMENT	DEBT INSTRUMENTS:	BONDS			
NOTIFICATION IF <1	N				
AVERAGE TRADE PER					
BUSINESS DAY IN THE					
PREVIOUS YEAR					
TOP FIVE ENTITIES	PROPORTION OF	PROPORTION OF	PERCENTAGE OF	PERCENTAGE OF	PERCENTAGE OF
RANKED IN TERMS OF	VOLUME TRADED	ORDERS	PASSIVE ORDERS	AGGRESSIVE	DIRECTED ORDERS
TRADING VOLUMES	AS A PERCENTAGE	EXECUTED AS A		ORDERS	
(DESCENDING ORDER)	OF TOTAL IN THAT	PERCENTAGE OF			
	CLASS	TOTAL IN THAT			
		CLASS			
IBLLC	100.00%	100.00%	100.00%	0.00%	0.00%
(500BSE5T552106SMZR28)					



# Debt Instruments: Money Markets Instruments

CLASS OF INSTRUMENT	DEBT INSTRUMENTS:	MONEY MARKETS INS	STRUMENTS		
NOTIFICATION IF <1	N				
AVERAGE TRADE PER					
BUSINESS DAY IN THE					
PREVIOUS YEAR					
TOP FIVE ENTITIES	PROPORTION OF	PROPORTION OF	PERCENTAGE OF	PERCENTAGE OF	PERCENTAGE OF
RANKED IN TERMS OF	VOLUME TRADED	ORDERS	PASSIVE ORDERS	AGGRESSIVE	DIRECTED ORDERS
TRADING VOLUMES	AS A PERCENTAGE	EXECUTED AS A		ORDERS	
(DESCENDING ORDER)	OF TOTAL IN THAT	PERCENTAGE OF			
	CLASS	TOTAL IN THAT			
		CLASS			
IBLLC	100.00%	100.00%	100.00%	0.00%	0.00%
(500BSE5T552106SMZR28)					



Interest Rates Derivatives: Futures and Options Admitted to Trading on a Trading Venue

CLASS OF INSTRUMENT	INTEREST RATES DE	RIVATIVES: FUTURES A	AND OPTIONS ADMITTE	D TO TRADING ON A T	RADING VENUE
NOTIFICATION IF <1	N				
AVERAGE TRADE PER					
BUSINESS DAY IN THE					
PREVIOUS YEAR					
TOP FIVE ENTITIES 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 A PERCENTAGE OF TOTAL IN THAT CLASS	PERCENTAGE OF PASSIVE ORDERS	PERCENTAGE OF AGGRESSIVE ORDERS	PERCENTAGE OF DIRECTED ORDERS
IBLLC	100.00%	100.00%	100.00%	0.00%	0.00%
(500BSE5T5521O6SMZR28)					



Credit Derivatives: Other Credit Derivatives

CLASS OF INSTRUMENT	CREDIT DERIVATIVES	: OTHER CREDIT DERI	VATIVES		
NOTIFICATION IF <1	N				
AVERAGE TRADE PER					
BUSINESS DAY IN THE					
PREVIOUS YEAR					
TOP FIVE ENTITIES 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 A PERCENTAGE OF TOTAL IN THAT CLASS	PERCENTAGE OF PASSIVE ORDERS	PERCENTAGE OF AGGRESSIVE ORDERS	PERCENTAGE OF DIRECTED ORDERS
IBLLC	100.00%	100.00%	100.00%	0.00%	0.00%
(500BSE5T552106SMZR28)					



Currency Derivatives: Futures and Options Admitted to Trading on a Trading Venue

CLASS OF INSTRUMENT	<b>CURRENCY DERIVAT</b>	IVES: FUTURES AND O	PTIONS ADMITTED TO	TRADING ON A TRADIN	NG VENUE
NOTIFICATION IF <1	N				
AVERAGE TRADE PER					
BUSINESS DAY IN THE					
PREVIOUS YEAR					
TOP FIVE ENTITIES 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 A PERCENTAGE OF TOTAL IN THAT CLASS	PERCENTAGE OF PASSIVE ORDERS	PERCENTAGE OF AGGRESSIVE ORDERS	PERCENTAGE OF DIRECTED ORDERS
IBLLC	100.00%	100.00%	100.00%	0.00%	0.00%
(500BSE5T552106SMZR28)					



# Structured Finance Instruments

CLASS OF INSTRUMENT	STRUCTURED FINAN	CE INSTRUMENTS			
NOTIFICATION IF <1	N				
AVERAGE TRADE PER					
BUSINESS DAY IN THE					
PREVIOUS YEAR					
TOP FIVE ENTITIES	PROPORTION OF	PROPORTION OF	PERCENTAGE OF	PERCENTAGE OF	PERCENTAGE OF
RANKED IN TERMS OF	VOLUME TRADED	ORDERS	PASSIVE ORDERS	AGGRESSIVE	DIRECTED ORDERS
TRADING VOLUMES	AS A PERCENTAGE	EXECUTED AS A		ORDERS	
(DESCENDING ORDER)	OF TOTAL IN THAT	PERCENTAGE OF			
	CLASS	TOTAL IN THAT			
		CLASS			
IBLLC	100.00%	100.00%	100.00%	0.00%	0.00%
(500BSE5T5521O6SMZR28)					



Equity Derivatives: Options and Futures Admitted to Trading on a Trading Venue

CLASS OF INSTRUMENT	<b>EQUITY DERIVATIVES</b>	S: OPTIONS AND FUTUR	RES ADMITTED TO TRA	DING ON A TRADING V	ENUE
NOTIFICATION IF <1 AVERAGE TRADE PER	N				
BUSINESS DAY IN THE PREVIOUS YEAR					
TOP FIVE ENTITIES 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 A PERCENTAGE OF TOTAL IN THAT CLASS	PERCENTAGE OF PASSIVE ORDERS	PERCENTAGE OF AGGRESSIVE ORDERS	PERCENTAGE OF DIRECTED ORDERS
IBLLC (500BSE5T552106SMZR28)	100.00%	100.00%	100.00%	0.00%	0.00%



Securitized Derivatives: Warrants and Certificate Derivatives

CLASS OF INSTRUMENT	SECURITIZED DERIVA	ATIVES: WARRANTS AN	ID CERTIFICATE DERIV	ATIVES	
NOTIFICATION IF <1	N				
AVERAGE TRADE PER					
BUSINESS DAY IN THE					
PREVIOUS YEAR					
TOP FIVE ENTITIES 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 A PERCENTAGE OF TOTAL IN THAT CLASS	PERCENTAGE OF PASSIVE ORDERS	PERCENTAGE OF AGGRESSIVE ORDERS	PERCENTAGE OF DIRECTED ORDERS
IBLLC	100.00%	100.00%	100.00%	0.00%	0.00%
(500BSE5T552106SMZR28)					



Commodities Derivatives and Emission Allowances Derivatives: Options and Futures Admitted to Trading on a Trading Venue

CLASS OF INSTRUMENT	COMMODITIES DERIVATIVES AND EMISSION ALLOWANCES DERIVATIVES: OPTIONS AND FUTURES ADMITTED TO TRADING ON A TRADING VENUE						
NOTIFICATION IF <1 AVERAGE TRADE PER BUSINESS DAY IN THE PREVIOUS YEAR	N						
TOP FIVE ENTITIES 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 A PERCENTAGE OF TOTAL IN THAT CLASS	PERCENTAGE OF PASSIVE ORDERS	PERCENTAGE OF AGGRESSIVE ORDERS	PERCENTAGE OF DIRECTED ORDERS		
IBLLC (500BSE5T552106SMZR28)	100.00%	100.00%	100.00%	0.00%	0.00%		



Contracts for Difference: Stock Underlying

CLASS OF INSTRUMENT	CONTRACTS FOR DIFFERENCE: STOCK UNDERLYING				
NOTIFICATION IF <1 AVERAGE TRADE PER BUSINESS DAY IN THE PREVIOUS YEAR	N				
TOP FIVE ENTITIES 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 A PERCENTAGE OF TOTAL IN THAT CLASS	PERCENTAGE OF PASSIVE ORDERS	PERCENTAGE OF AGGRESSIVE ORDERS	PERCENTAGE OF DIRECTED ORDERS
IBLLC (500BSE5T5521O6SMZR28)	100.00%	100.00%	0.00%	0.00%	0.00%



# Contracts for Difference: Index Underlying

CLASS OF INSTRUMENT	CONTRACTS FOR DIFFERENCE: INDEX UNDERLYING				
NOTIFICATION IF <1	N				
AVERAGE TRADE PER					
BUSINESS DAY IN THE					
PREVIOUS YEAR					
TOP FIVE ENTITIES 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 A PERCENTAGE OF TOTAL IN THAT CLASS	PERCENTAGE OF PASSIVE ORDERS	PERCENTAGE OF AGGRESSIVE ORDERS	PERCENTAGE OF DIRECTED ORDERS
IBLLC	100.00%	100.00%	0.00%	0.00%	0.00%
(500BSE5T5521O6SMZR28)					



# Contracts for Difference: Index Underlying

CLASS OF INSTRUMENT	CONTRACTS FOR DIFFERENCE: CASH UNDERLYING				
NOTIFICATION IF <1	N				
AVERAGE TRADE PER					
BUSINESS DAY IN THE					
PREVIOUS YEAR					
TOP FIVE ENTITIES 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 A PERCENTAGE OF TOTAL IN THAT CLASS	PERCENTAGE OF PASSIVE ORDERS	PERCENTAGE OF AGGRESSIVE ORDERS	PERCENTAGE OF DIRECTED ORDERS
IBLLC	100.00%	100.00%	0.00%	0.00%	0.00%
(500BSE5T5521O6SMZR28)					



Exchange Traded Products (Exchange Traded Funds, Exchange Traded Notes and Exchange Traded Commodities)

CLASS OF INSTRUMENT	EXCHANGE TRADED PRODUCTS (EXCHANGE TRADED FUNDS, EXCHANGE TRADED NOTES AND EXCHANGE TRADED COMMODITIES)				
NOTIFICATION IF <1 AVERAGE TRADE PER BUSINESS DAY IN THE PREVIOUS YEAR	N				
TOP FIVE ENTITIES 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 A PERCENTAGE OF TOTAL IN THAT CLASS	PERCENTAGE OF PASSIVE ORDERS	PERCENTAGE OF AGGRESSIVE ORDERS	PERCENTAGE OF DIRECTED ORDERS
IBLLC (500BSE5T552106SMZR28)	100.00%	100.00%	0.00%	0.00%	0.00%



### QUALITY ASSESSMENT OF ORDER EXECUTION

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;

When determining whether best execution has been achieved, on an overall basis, LYNX will give precedence to price and cost (Total Consideration). LYNX may consider speed, likelihood of execution and settlement, the size and nature of the order, market impact and any other implicit transaction costs and give them precedence over the immediate price and cost factors if they are instrumental in delivering the best possible result in terms of the Total Consideration to 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;

There are no discernible links or common ownership with execution venues which could give rise to conflicts or interest. LYNX is only receiving and transmitting orders for exclusive execution by Interactive Brokers Ireland Limited<sup>2</sup>.

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

LYNX has no brokerage agreements in place with execution venues. No fees or rebates are received.

(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;

LYNX has no brokerage agreements in place with execution venues.

(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:

The quality and appropriateness of execution is not generally determined or differentiated by client classification.

(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;

No other criteria above immediate price and cost are given precedence in respect of the receipt and transmission of orders of clients classified as Retail clients under MiFID II.

(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 Commission Delegated Regulation (EU) .../...to be inserted before publication [RTS 27];

LYNX uses the RTS27 quality of execution data of Interactive Brokers Ireland Limited to periodically monitor and review the quality of the execution.

(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.

LYNX did not use a consolidated tape provider in 2019.

<sup>&</sup>lt;sup>2</sup> For Swiss (non-EU) clients: Interactive Brokers Limited in the United Kingdom.