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DISCRETIONARY PORTFOLIO MANAGEMENT / MANAGED ACCOUNT

ANNUAL REPORT RTS 28

2024

1. REGULATORY CONTEXT

Pursuant to Article 65 (6° and 8°) of Commission Regulation (EU) 2017/565 of 25 April 2016 amending Directive 2014/65 (hereinafter referred to as "MiFID II"), Rcube Asset Management ("Rcube") is required to publish annually a report on the execution of its orders carried out as part of its authorisation to provide to its clients discretionary portfolio management services (i.e. discretionary portfolio management under French law). Rcube includes in this report the data relating to its CTA activities (i.e. managed accounts under US law).

The quantitative and qualitative data presented in this report relate only to orders executed as part of its discretionary mandates and managed account activity with its professional clients / qualified eligible participants.

Rcube has chosen to present the information by type of discretionary mandate :

- French discretionary portfolio management ;
- American managed accounts.

2. SCOPE OF FINANCIAL INSTRUMENTS

The financial instruments concerned on behalf of the discretionary mandates and managed accounts set up between Rcube and its clients in accordance with MiFID II are :

- Equities — Shares & Depositary Receipts ;
- Commodity derivatives and emission allowances derivatives ;
- Interest rates derivatives ;
- Currency derivatives ;
- Index derivatives ;
- Credit derivatives ;
- Exchange traded funds.

3. INFORMATION ON THE TOP FIVE EXECUTION VENUES AND QUALITY OF EXECUTION OBTAINED PER CLASS OF FINANCIAL INSTRUMENT

A – DISCRETIONARY PORTFOLIO MANAGEMENT / PROFESSIONAL CLIENTS

Class of Instrument	Index derivatives				
	Futures and options admitted to trading on a trading venue				
Notification if < 1 average trade per business day in the previous year	No				
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
EUREX FRANKFURT AG LEI : 529900UT4DG0LG5R9007	92.63%	99.54%	20%	80%	0%
AUREL BGC LEI : 5RJTDGZG4559ESIYLD31	4.63%	0.21%	100%	0%	0%
JB DRAX HONORE (FRANCE) SAS LEI : 894500FGGEST402U7M69	1.55%	0.11%	100%	0%	0%
BRITANNIA GLOBAL MARKETS LIMITED LEI : 213800GWMSRCJYDTHO27	0.59%	0.04%	100%	0%	0%
BGC BROKERS L.P LEI : 5067009V4VP9B1K40F66	0.59%	0.04%	100%	0%	0%

Class of Instrument	Commodities derivatives and emission allowances Derivatives				
	Futures and options admitted to trading on a trading venue				
Notification if < 1 average trade per business day in the previous year	No				
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
EURONEXT NV LEI : 724500QJ4QSZ3H9QU415	79.97%	99.19%	80%	20%	0%
BGC BROKERS L.P LEI : 5067009V4VP9B1K40F66	19.36%	0.74%	100%	0%	0%
LCM COMMODITIES, LLC LEI : 549300GZZIZL8PRTUI04	0.48%	0.04%	100%	0%	0%
PLANTUREUX & ASSOCIÉS LEI : 969500ERWIOP3R7HUS93	0.19%	0.03%	100%	0%	0%

B – MANAGED ACCOUNTS / PROFESSIONAL CLIENTS – QUALIFIED ELIGIBLE PARTICIPANTS (QEP)

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	No				
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

StoneX Financial Ltd LEI : 549300AWF3TOHRYL7754	100%	100%	36.20%	63.80%	0%
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Class of Instrument	Currency derivatives				
	Futures and options admitted to trading on a trading venue				
Notification if < 1 average trade per business day in the previous year	No				
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
StoneX Financial Ltd LEI : 549300AWF3TOHRYL7754	100%	100%	23.54%	76.46%	0%

Class of Instrument	Index derivatives				
	Futures and options admitted to trading on a trading venue				
Notification if < 1 average trade per business day in the previous year	No				
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
StoneX Financial Ltd LEI : 549300AWF3TOHRYL7754	100%	100%	64.19%	35.81%	0%

Class of Instrument	Interest rates derivatives				
	Futures and options admitted to trading on a trading venue				
Notification if < 1 average trade per business day in the previous year	No				
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
StoneX FINANCIAL LTD LEI : 549300AWF3TOHRYL7754	100%	100%	51.26%	48.74%	0%

4. ANALYSIS OF THE QUALITY OF EXECUTION OBTAINED ON THE EXECUTION VENUES

A – RELATIVE IMPORTANCE GIVEN TO FACTORS OF PRICE, COSTS, SPEED, LIKELIHOOD OF EXECUTION, ...

The key (non-exclusive) execution factors that we value in order to achieve the best possible result are :

- Probability of execution/size – given the size of some of our trades, we prioritize probability of execution, which means that we prefer execution venues that allow us to fulfill either the entire order or at least a material part of it. This may be the case, for example, when an order is particularly large or when a particular instrument is not very liquid ;
- The price; and
- Speed of execution – for some of our transactions, speed can be a key factor. For example, if the portfolio manager believes that the market can move in the short term, he can prioritize speed as an execution factor to ensure that any market movement is profitable for him.

The application of execution factors will necessarily differ depending on the characteristics of the transaction concerned in certain markets and the nature of the financial instrument that is the subject of the transaction. For example, markets where pre-trade information is extremely limited and those where such pre-trade information is widely available and transparent.

The cost of the transaction is not the most important factor considered by Rcube, since for the majority of transactions, execution costs with counterparties are standardized. This may differ in some markets where practices may be less developed. If this is the case, we place more emphasis on cost as an execution factor.

Nevertheless, other factors are also taken into account by Rcube, including, the counterparty's ability to fulfill its best execution obligations, liquidity, execution venues, reliability of Settlement/Delivery systems, and quality of support services (Middle / Back Office).

B – POSSIBLE CLOSE LINKS, CONFLICTS OF INTERESTS, AND COMMON OWNERSHIPS WITH RESPECT TO ANY EXECUTION VENUES USED TO EXECUTE ORDERS

Rcube has implemented a conflict of interest management policy as well as a conflict of interest risk mapping detailing potential conflict of interest situations. No close link, conflict of interest and common ownership with one or more of the platforms used to execute its orders has been identified by Rcube.

C – SPECIFIC ARRANGEMENTS WITH ANY EXECUTION VENUES REGARDING PAYMENTS MADE OR RECEIVED, DISCOUNTS, REBATES OR NON-MONETARY BENEFITS RECEIVED

Rcube has no special agreement of this type with a market intermediary.

D – FACTORS THAT LED TO A CHANGE IN THE LIST OF EXECUTION VENUES LISTED IN THE FIRM'S EXECUTION POLICY

Whether for discretionary portfolio management or managed accounts, Rcube has not changed its list of execution platforms and still uses StoneX Financial Ltd. as its main broker.

Rcube Asset Management SAS
Date : 5 May 2025