

# Report on the execution quality of client orders in 2021

Raiffeisen Bank International AG ("RBI") is publishing this report on the execution quality of orders executed on behalf of retail clients and professional clients during the period January 2021 until December 2021.

### Description of the importance of execution criteria

RBI has issued an order execution policy for client orders which regulates the relative importance of the execution criteria, in particular the price of the financial instrument, the costs related to the execution of the order, the speed and likelihood of execution and settlement and the size and nature of the order.

When executing orders on behalf of retail and professional clients the best possible result shall primarily be determined on the basis of the total consideration. The total consideration comprises the price of the financial instrument and any other costs related to the execution of the order. Excluded are other costs charged directly to the client by third parties (e.g. custody costs). The likelihood of execution, the speed of execution and likelihood of settlement are execution criteria which are also equally taken into account secondary to the total execution costs. This determination of the relative importance of execution criteria applies to all types of financial instruments.

For further information on the execution policy of RBI and the relevant factors for determining the relative importance of execution criteria please refer to the document "Order Execution Policy For Professional and Retail Clients" which is available for download at <a href="https://www.rbinternational.com/de/startseite/agb.html">https://www.rbinternational.com/de/startseite/agb.html</a>.

#### Changes to execution venues and intermediaries

RBI is monitoring the execution quality on an ongoing basis and regularly reviewing, at least annually, the adequacy of the order execution policy as well as the selected execution venues and intermediaries to ensure the best possible result for clients on a consistent basis when executing client orders.

In the course of the regular reviews both qualitative as well as quantitative criteria are assessed. In particular, the results of the ongoing monitoring, the likelihood of execution and settlement, local market knowledge of intermediaries, customer complaints received and loss events occurred will be analysed and assessed for each execution venue and intermediary. To the extent necessary separate assessments will be made for specific types of financial instruments. Based on these criteria an overall assessment is made which serves as the basis for a decision on the adequacy of execution channels and the respective execution venues and intermediaries. Monitoring and assessment of the execution quality and the appropriateness of the order execution policy is made by using data and tools which are mentioned in this chapter (Use of data and IT tools).

## Close links, conflicts of interests and common ownerships with respect to any execution venues

RBI has issued guidelines for conflicts of interests handling. These guidelines aim at preventing potential or actual conflicts of interests which are detrimental to the client's interest. For further information on the measures implemented by RBI to identify and manage conflicts of interests please refer to the brochure "General Information on Transactions in Financial Instruments" which is available for download at <a href="https://www.rbinternational.com/de/startseite/agb.html">https://www.rbinternational.com/de/startseite/agb.html</a>.

Close links exist to the following execution venues:

RBI is holding approximately 6.97% of the shares in Wiener Börse AG (Vienna Stock Exchange). Wiener Börse AG is holding approx. 99.54% of the shares in Burza cennych papiru Praha, a. s. (Praha StockExchange).

Raiffeisen Centrobank AG ("RCB") is an indirect 100% subsidiary of RBI. RCB is one of the most important intermediaries for RBI when executing client orders. RCB is acting as a systematic internaliser for own issued certificates and certain shares. During the reporting period the preparations for a demerger for absorption of the capital markets business of RCB by RBI with a planned closing date of 30.11.2022 were ongoing. During this integration period certain employees of RBI who are responsible for the electronic execution of client orders in publicly listed financial instruments are under a cooperation agreement

simultaneously in charge of the execution on the market side on behalf of RCB. Also in case the guidelines for conflicts of interests handling and the best execution policy apply.

The chairman of the management board of RCB Harald Kröger holds the position of Head of Group Investment Banking in RBI. Heike Arbter, a member of RCB's management board, is a member of the Exchange Council of the Baden-Wuerttembergische Wertpapierboerse in Stuttgart and a member of the arbitration tribunal of the Vienna Stock Exchange.

# Other material arrangements with execution venues

RBI has neither entered into any agreements with execution venues relating to, or otherwise accepted or provided discounts, rebates or other non-monetary benefits for the transmission of client orders, which are in conflict with the conflict of interests or inducement provisions pursuant to Directive 2014/65/EU.

#### Use of data and IT tools

RBI is automatically monitoring all executions on behalf professional and retail clients using historical market data and reverence prices. The execution price of exchange transactions is compared with prevailing and tradable market prices at the time of the transaction on alternative execution venues. All executions on behalf of clients in any type of financial instrument either directly executed by RBI or transmitted to intermediaries for execution are monitored.

Publications pursuant to Delegated Regulation (EU) 2017/575 were not used by RBI for such purpose during the reporting period.

### Use of information provided by consolidated tape provider

RBI did not use any data services of a consolidated tape provider during the reporting period for the purposes of the execution of or monitoring of the execution quality of client orders.