Raiffeisen Bank International AG

Order Execution Policy for Professional and Retail Clients

V 2.4 as of 30.06.2024

Contents

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Swift Code: RZBAATWW, Bank Sort Code: 31000

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Preamble and purpose

Raiffeisen Bank International AG (hereinafter referred to as "RBI") has implemented an execution policy for financial instruments that enabled RBI to obtain the best result for its clients. This execution policy contains principles that are applicable for transactions in financial instruments undertaken by retail or professional customers according to the Regulation 2014/65/EU ("MiFID II") and the Austrian Securities Supervision Act ("WAG 2018") as well as the delegated Regulation (EU) 2017/565.

This policy contains a list in Annex 1 and 2 of the execution venues and financial intermediaries that RBI is using frequently to obtain the best result for its clients.

RBI informs its clients about material changes in this policy. Additionally, this policy is accessible on RBIs homepage under www.rbinternational.com in its most recent version. If communication via electronic means was agreed upon with the client, the publication on RBIs homepage is sufficient.

This document is for information purposes only and does not constitute, replace or modify any contractual agreement between RBI and its customers.

Definition

- Financial instruments encompass the instruments set out in § 1 num 7 WAG 2018 / Annex 1, Section C MIFID II.
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- "Trading Venues" are Regulated Markets (Exchanges), Multilateral Trading Facilities (MTF) and Organized Trading Facilities (OTF).
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- "Execution Venues" are Trading Venues, Systematic Internalisers, Market Makers or other Liquidity Providers.

"Smart Order Router" is an algorithmic trading system, executing orders in financial instruments whole or partially on one or more execution venues under consideration of the deviating price and liquidity levels on different execution venues with the goal to achieve the best result for the client.

Scope of application

Personal scope of application

This policy is applicable for executions in financial instruments for professional and retail clients. Due to explicit regulation this policy does not apply to eligible counterparties.

Material scope

This policy is applicable for transactions in financial instruments forwarded by clients for execution on execution venues directly or via financial intermediaries as well as transactions against the own books of RBI. Out of scope are the issuing and redemption of units in investment funds using a custodian bank.

General principles, criteria and procedures

Best Execution Factors

RBI shall act honestly, fairly and professionally in the best interests of its customers when executing orders for such customers. RBI considers price, cost, speed, likelihood of execution and settlement, size, nature and other relevant aspects of the order. For retail clients only the consideration of all costs related to the execution, including the price and any directly linked cost, shall determine the best possible result. Not included are any third-party costs not directly charged by RBI, e.g. fees for the securities account with any third party.

Weighting of the execution criteria

The main criteria for determining if the best execution for professional and retail clients was achieved is the total consideration of all costs.

Such costs contain of the following:
- Execution price: Execution price shall mean the price paid or received within the transaction with a financial instrument.
- Costs: Costs contain the expenses, fees and similar costs charged by RBI to the client, including brokerage fees. Not part of the costs are fees and expenses charged by any third party to the client such as securities account fees connected with a securities deposit not held by RBI.

For professional clients the following factors shall also be equally considered after the costs:
- Speed of execution: The speed of execution is determined by the speed of which an order in a financial instrumentis accepted and executed on the execution venue. Such speed is depended on the technical infrastructure and the trading model an execution venue is operating. Delay due to the technical setup of the client until the order is received by RBI will not be considered.
- Likelihood of execution: The likelihood of execution means the probability of an order to be executed on an execution venue given the current venue conditions. The likelihood of execution is depending on the liquidity of the relevant financial instrument on the execution venue.
- Likelihood of settlement: The likelihood of the settlement means the probability that an executed trade will be settled within due time.

Any deviation from the above mentioned might occur due the nature of the order or the circumstances of the execution venue.

Client instruction

If a client instructs RBI to handle its order in a financial instrument in a specific way, RBI is no longer bound the provisions of this policy but will execute the order according to the instructions provided by the client. If the instruction only applies to a specific part of the execution process, RBI is still bound the provisions of this policy for the parts of the order not instructed by the client. Regardless of a client instruction RBI will still execute the order honest,fair and act in the best interest of the client.

Instructions to execute the order on a specific execution venue are interpreted as an instruction to execute the order within a settlement arrangement (settlement without the necessity to change the central custodian) and do not bind RBI to execute the order on specific execution venue (see chapter 4.4. Smart Order Routing).

Some types of orders already contain client instructions as integral part of such type, like to execute an order only at a certain price for limit orders (see chapter 5. Order and Execution types)
Other than in this chapter mentioned instructions can only be received via email and outside of electronic order routing.

In single cases RBI reserves its rights to reject instructions, especially if such instruction is not possible to fulfill, e.g. if an execution venue does not support a certain order type. The rejection of the instruction will lead to the rejection of the order. RBI will inform the client as soon as possible about such rejection.

Smart Order Routing

RBI reserves its rights to execute orders in collaboration with its financial intermediaries as so called "Smart Order Routing".

Financial instruments are increasingly trading on multiple venues. Due to varying demand and supply on the different venues the price and liquidity for a financial instrument can change from venue to venue. To achieve the best possible result for its clients on a regular basis RBI must consider executions on many alternative trading venues. For this purpose, RBI uses a Smart Order Router. This Smart Order Router observes the connected execution venue and is searching for the best combination of executions on different execution venues. The Smart Order Router is only executing within the same settlement arrangement, so that costs of custodial changes are avoided.

If you wish not to use the service of a Smart Order Router please contact your account manager.

If the Smart Order Router is used depends on the special characteristics of the financial instrument as well as the liquidity and the listings. For questions regarding the usage of the Smart Order Router for specific instruments please refer to your account manager.

Executions via a systematic internaliser (SI)

RBI reserves its rights to execute client orders against an internal or external SI, in line with general provisions regarding best execution for client orders. Orders of retail clients can be executed via an SI if the total cost is equal or better than an execution on another execution venue. For professional clients the speed and likelihood of execution and the likelihood of a settlement are considers in addition to the price of the financial instrument.

For executions via a SI the client must give its prior consent, in general or for a specific order, to be executed outside of a trading venue or via a SI.

In case an execution against RBI in its role as SI cannot be achieved, the order will be rerouted to the main trading venue of the financial instrument.

Criteria for an execution outside of a trading venue or systematic internaliser

RBI reserves its rights to execute a client order in financial instruments outside of a trading venue (TV) or systematic internaliser if the necessary permissions are provided by the client in general or for a specific order, even though the instrument is listed on a trading venue.

Execution of transactions outside of a TV or SI are subject to the general provisions of best execution and acting in the best interest of the client.

For example, the speed of execution, the total costs for a large volume order or the likelihood of settlement can be considered if an order is executed outside of a trading venue.

Such transactions can be executed against a third party or RBI itself as a counterpart.

In case the permission was given to execute orders outside a TV or SI, RBI assumes that, without prejudice to other written agreements, the legally required necessary technical procedures are in place. This includes the ability to fulfill the necessary reporting obligations if applicable.

Pricing for transactions outside of a trading venue

On a trading venue the best available price will be determined by supply and demand.
RBI offers its clients under specific circumstances the execution of orders outside of a trading venue or against RBI itself. To ensure a fair pricing and ensure an execution in line with the best execution standards RBI uses either generally accepted methods.

If you have any questions regarding the price on an transaction offered, please contact your account manager.

Aggregation and allocation

RBI will only aggregate client orders in financial instruments with other client orders or with orders on RBIs own account if the aggregation will unlikely lead to a disadvantageous position for the client(s).

The aggregation of orders might be disadvantageous in relation to a particular client order.

RBI does not aggregate orders on own account with client orders designated to be executed on an exchange venue. For primary market transactions RBI might aggregate orders for the order book with orders from other clients and orders on RBIs own account. If the allocated size is not enough to execute every aggregated order completely, the allocation will be on a pro rata basis. If RBIs own orders were aggregation with client orders, the client order will be fulfilled first. Only if it is reasonable to expect that, without RBIs orders, the client would have not been allocated as favorable (e.g. if the size of the client order would not be sufficient to receive any allocation), the allocation between RBI and the client orders(s) will be on a pro rata basis. If the aggregated order is executed in more than one transaction and the price of these transactions vary, the size weighted average price will be settled to alle involved orders.

Allocations where RBI provides any placement services for an issuer are not subject to this policy. The allocation for such placement services is subject to RBIs Allocation Policy (https://www.rbinternational.com/en/raiffeisen/legal/business-terms.html)

Types of executions and order additions

Special types of executions and order additions are dependent on the trading model operated by the exchange. RBI does not offer every type of execution and order addition on every market. A list of the available types of executions and order additions can be provided prior to the order placement by your account manager.

Types of executions

Executions can occur either through pricing based on supply and demand at an execution venue (such as through a public order book) or through a request for quote (RFQ) from a trading partner.

For executions at execution venues, the execution venue provides the possibilities how an order can be executed. For example, an execution venue can provide market, limit or stop orders.

Whether a particular order type is available can be inquired from the respective account manager before placing the order.

Pricing due to supply and demand

The price of most exchange-traded financial instruments is determined by the interplay of supply and demand in the order book.

If the price expectations of the buyer and seller match, the order is executed. For market participants with the corresponding accesses, the order book is visible, if this is not prevented by the trading mode.

Request for Quote

In the RFQ-based trading method, the client contacts the bank or trading venue and requests the announcement of a price or quote for a particular product that the client wishes to buy or sell.

An **RFQ** is always a price inquiry of a binding ("firm") and thus tradable price or quotation and can be clearly distinguished from a purely non-binding price inquiry ("indicative request"). A non-binding price request is only for information purposes.

Non-binding price enquiries can only be submitted to RBI via voice and not via a trading venue or electronically.

Upon receipt of an RFQ from a customer, RBI will price the product in accordance with the Execution Policy and send the customer the Purchase or Sale Offer so that the customer may subsequently decide to either accept or reject the Binding Offer.

In order to initiate tradable transactions in financial instruments through RBI, a customer may contact RBI either through a trading venue or through voice to obtain a binding and tradable quote for a specific financial instrument. Not all financial instruments are tradable through a trading venue and Voice.
For the purposes of this Execution Policy, "**Voice**" means communication between RBI and the Customer via telephone, e-mail or chat rooms. In the interests of user safety during voice trading activities via chat rooms, RBI only uses chat rooms operated by Bloomberg and Refinitiv.

Request-for-Quote (RFQ) via a Trading Venue

Price enquiries via a trading venue are processed as follows: In order to trade a financial instrument, the customer submits a price request for such a financial instrument to the marketplace and provides all the information necessary for the pricing of that particular instrument. Once the price request has been submitted by the customer, RBI prices the requested financial instrument in accordance with the best execution factors and transmits a tradable (i.e. binding) price to the customer via the trading venue. Upon receipt of this binding price, the client may either reject or accept the offer in order to execute a transaction under the terms of the trading venue.

The highest transparency with regard to the market conditions for a transaction with a specific financial instrument is provided if the customer contacts RBI via an trading venue. When settling transactions via an MTF, the customer can make price enquiries to a large number of counterparties (one of which is RBI) and thus select the best offer from the large number of counterparties that may be contacted.

Request-for-Quote via Voice

Voice based price enquiries and business via voice are generally handled as follows: The customer intends to trade a financial instrument and contacts RBI to submit a price request via telephone, e-mail or chat room, providing all specific information required for pricing and trading the financial instrument. RBI then prices the desired financial instrument in accordance with the best execution factors and sends the client a tradable (i.e. binding) price via the voice channel chosen by the client. Upon receipt of such a binding price, the client may either accept or reject the offer.

Order additions

Order additions are a possibility to forward an order to the execution venue by setting predefined execution parameters. Depending on the financial instrument and the execution venue, the customer has various options for adjusting his order with execution additions. Order types and execution additions can complement or exclude each other, depending on the order addition.
RBI does not guarantee any prices or volumes but executes order additions on a best effort basis. More detailed information on the availability of order additions to specific orders can be provided by the respective account manager upon request.

Non-exchange-traded derivatives can only be traded on the basis of price requests (requests-for-quote).

Rationale and criteria for selection of Execution venues

In order to consistently achieve the best possible results for clients when executing orders, it is necessary to select execution venues that are technically and structurally appropriately equipped to provide their services consistently and with high quality.

In the selection process for execution venues, the following criteria shall be taken into account for each class of financial instruments in the course of a comparative assessment of the best possible results that can be achieved in the execution of the client order on each competing execution venue:
- ➢ Availability of a particular financial instrument
- ➢ Technical reliability of access to the execution venue and the respective financial instruments
- ➢ Number of participants in the trading of a financial instrument
- ➢ Daily traded volume
- ➢ Adequacy of the trading mode: RFQ, continuous auction, etc.
- ➢ Availability of different order types
- ➢ Response time to a price request
- ➢ Execution speed of a market order
- ➢ Probability of execution of a market order
- ➢ Cost of executing such as the amount of fees per trade
- ➢ Availability of clearing
- ➢ Conditions for clearing and margining

RBI reserves the right not to offer all execution venues available for a financial instrument.

An ongoing review of the execution venues is performed as part of the review of the execution policy, which takes place at least once a year.

Rationale and criteria for selection of financial intermediaries

RBI does not have a direct connection to every execution venue. Therefore, RBI uses financial intermediaries for certain execution venues. Via these intermediaries, customers can be offered execution of their orders on a variety of execution venues.

The selection of these financial intermediaries is of similar importance as the selection of execution venues.

The following criteria are taken into account when selecting financial intermediaries.
- Offer of the execution venues
- Fee structure
- Settlement procedure
- Specialized knowledge of the offered execution venues
- Applicability of an execution policy according to MiFID II standards
- Technical connectivity
- Jurisdiction

Not all criteria can be considered equally for all intermediaries.

The ongoing review of financial intermediaries is carried out in the course of the review of the execution policy, which takes place at least once a year.

Executions against RBI itself

RBI reserves the right to execute client orders against its own books (i.e. to act as seller or buyer in its own name and for its own account). Execution RBI as a counterparty shall only take place if it complies with the principles of best execution as set out in this Execution Policy.

For execution against RBI as a systematic internaliser, see the in the paragraph Executions via a systematic internaliser.

If products are issued tailor-made for a customer, execution is regularly carried out against RBI's own book. In these cases, best execution is achieved through a fair valuation of the product price.

Inducements and conflict of interest

The granting and acceptance of monetary and non-monetary inducements by RBI in connection with the provision of investment services or ancillary services is permissible under certain circumstances. In general, RBI takes care that such benefits do not impair the best possible fulfilment of the duties towards the clients.

RBI regularly grants its distribution partners monetary and non-monetary inducements for the distribution of certificates and bonds issued by RBI. Non-monetary inducements include, in particular, the provision of information materials and the implementation of training measures. This is intended to ensure the quality of the advice and information provided to the client by the sales partner.

RBI may receive monetary and non-monetary inducements from third parties. In any case, RBI will not accept inducements from third parties if this is contrary to the best possible protection of client interests.

Achieved quality of best execution and routing of orders in the best interest of clients

RBI monitors regularly the quality of execution as well as the quality and appropriateness of its execution arrangements and policies to.

Based on the data collected during the ongoing monitoring of the effectiveness and appropriateness of its execution arrangements, RBI reviews its execution arrangements and policies at least on an annual basis. If deemed necessary, RBI will consider taking corrective actions regarding its execution arrangements and policies, in particular upon the occurrence of significant events that could impact the applied best execution parameters.

If a customer requests information on the execution policy in general or regarding a specific transaction executed through RBI, RBI shall provide such information to the customer within a reasonable period of time depending on the type and level of detail of the requested information.

Extraordinary events

In the event of extraordinary events such as significant intraday price fluctuations, computer failures, system or liquidity bottlenecks, RBI may be forced to select an execution that deviates from the execution policy (e.g. execution at an alternative execution venue). The basic principle for such a deviation from the execution policy is always to safeguard the best interest of the client.

Annex 1: Types of Execution Venues

Execution venue	Definition according to MiFID II
Regulated market	means a multilateral system operated and/or managed by a market operator, which brings together or facilitates the bringing together of multiple third-party buying and selling interests in financial instruments – in the system and in accordance with its non-discretionary rules – in a way that results in a contract, in respect of the financial instruments admitted to trading under its rules and/or systems
Multilateral trading facility (MTF)	means a multilateral system, operated by an investment firm or a market operator, which brings together multiple third-party buying and selling interests in financial instruments – in the system and in accordance with non-discretionary rules– in a way that results in a contract
Organised trading facility (OTF)	means a multilateral system which is not a regulated market or an MTF and in which multiple third-party buying and selling interests in bonds, structured finance products, emission allowances or derivatives are able to interact in the system in a way that results in a contract
Systematic Internaliser	means an investment firm which, on an organised, frequent systematic and substantial basis, deals on own account when executing client orders outside a regulated market, an MTF or an OTF without operating a multilateral system
Market maker	means a person who holds himself out on the financial markets on a continuous basis as being willing to deal on own account by buying and selling financial instruments against that person's proprietary capital at prices defined by that person
Other liquidity provider	means firms that hold themselves out as being willing to deal on own account, and which provide liquidity as part of their normal business activity, whether or not they have formal agreements in place or commit to providing liquidity on a continuous basis

Annex 2: Execution Venues that regularly achieve the best result

Intermediaries	
ABN AMRO Bank N.V.	Interactive Brokers LLC
AK Investment Menkul Degerler A.S.	InterCapital Securities Ltd.
AO Raiffeisenbank	Intesa Sanpaolo Bank Luxembourg S.A.
ATA Yatirim Menkul Kiymetler AS	Investment Technology Group Limited
Atonline Limited	IS Yatirim Menkul Degerler AS
Baader Bank AG	Jane Street Financial Limited
Banco Bilbao Vizcaya Argentaria	Jefferies International Limited
Banco Santander S.A.	JPMorgan Securities PLC
Bank Hapoalim	Landsbankinn hf.
Bank of America Merrill Lynch International	Leonteq Securties AG
Bank Vontobel AG	Macquarie Bank Ltd
Banque Cantonale de Geneve	Merrill Lynch International
Banque Pictet & Cie AS	Mirabaud Securities LLP
BCS Prime Brokerage Limited	Morgan Stanley and Co.
BGC Partners Securities	Optiver Holding B.V.
BNP Paribas SA	Patria Finance A.S.
Cantor Fitzgerald Europe	Piraeus Securities S.A.
Citigroup Global Markets	Raiffeisen Bank dd Bosna i
Citigroup Global Markets Ltd.	Raiffeisen Bank International AG
Commerzbank AG	Raiffeisen Bank SA
Deniz Yatirim Menkul Kiymetler A.S.	Raiffeisen Bank Zrt
Deutsche Bank AG	Raiffeisen Banka A.D. Beograd
Dom Maklerski Banku Handlowego S.A.	Raiffeisen Capital AD
Dom Maklerski PKO Banku Polskiego	Raiffeisenbank Austria DD
Donner und Reuschel AG	Raifffeisen Bank Aval JSC
Dragon Capital (Cyprus) Limited	RBC Europe Ltd
DZ Bank AG, Deutsche Zentral	Renaissance Securities (Cyprus) Ltd
equinet Bank AG	Santander Bank Polska S.A.
Erste Group Bank AG	Société Générale
Exane Limited	Swedbank AS
Flow Traders B.V.	Tatra Banka AS
Garanti Yatirim Menkul Kiymetler	TEB Yatirim Menkul Degerler
Gedik Yatirim Menkul Degerler A.S.	Tradition London Clearing Ltd.
GFI Securities Limited	Trigon Dom Maklerski SA
Global Securities Inc.	UBS AG
Goldman Sachs International	UBS Switzerland AG
HSBC Bank Plc	Unicredit Bank AG
ICF Bank AG	UniCredit SpA
Ilirika Investments AD Skopje	Ünlü Menkul Degerler A.S.
IMC Trading B.V.	VIRTU Financial Ireland Ltd
ING Bank NV	VTB Capital plc
Instinet Europe Limited	Wood + Company Financial Services

Bonds:

COUNTRY	MARKET OPERATOR	OPERATOR MIC
AUSTRIA	WIENER BOERSE AG	XWBO
GERMANY	BOERSE DUESSELDORF	XDUS
GERMANY	BOERSE STUTTGART	XSTU
GERMANY	DEUTSCHE BOERSE AG	XFRA
GERMANY	TRADEGATE EXCHANGE	TGAT
NETHERLANDS	BLOOMBERG TRADING FACILITY B.V.	BTFE
NETHERLANDS	MARKETAXESS NL B.V.	MANL
NETHERLANDS	TRADEWEB EU BV	TWEU
UNITED KINGDOM	BLOOMBERG TRADING FACILITY LIMITED	BMTF
UNITED KINGDOM	MARKETAXESS EUROPE LIMITED	MAEL
UNITED KINGDOM	TRADEWEB EUROPE LIMITED	TREU

Currency and Interest Rate Derivatives:

COUNTRY	MARKET OPERATOR	OPERATOR MIC
CZECH REPUBLIC	42 FINANCIAL SERVICES	FTFS
FRANCE	TP ICAP EU – MTF	TPIC
FRANCE	TSAF OTC – OTF	TSAF
GERMANY	360T	360T
IRELAND	REFINITIV MTF	RMTF
NETHERLANDS	BLOOMBERG TRADING FACILITY B.V.	BTFE
NETHERLANDS	TRADEWEB EU BV	TWEU
UNITED KINGDOM	BGC BROKERS LP	BGCI
UNITED KINGDOM	BLOOMBERG TRADING FACILITY LIMITED	BMTF
UNITED KINGDOM	CONTINENTAL CAPITAL MARKETS LIMITED – OTF	CCML
UNITED KINGDOM	INTEGRAL MTF	IMTF

Equity and Equity Derivatives:

COUNTRY	MARKET OPERATOR	OPERATOR MIC
AUSTRALIA	ASX – ALL MARKETS	XASX
AUSTRIA	WIENER BOERSE AG	XWBO
CANADA	THE MONTREAL EXCHANGE	XMOD
CANADA	TORONTO STOCK EXCHANGE	XTSE
CANADA	TSX VENTURE EXCHANGE	XTSX
CZECH REPUBLIC	PRAGUE STOCK EXCHANGE	XPRA
DENMARK	NASDAQ COPENHAGEN A/S	XCSE
FRANCE	EURONEXT – EURONEXT PARIS	XPAR
FRANCE	EURONEXT – EURONEXT PARIS	XPAR
GERMANY	BOERSE STUTTGART	XSTU

GERMANY	DEUTSCHE BOERSE AG	XFRA
GERMANY	EUREX DEUTSCHLAND	XEUR
GERMANY	XETRA	XETR
HONG KONG	HONG KONG FUTURES EXCHANGE LTD.	XHKF
HUNGARY	BUDAPEST STOCK EXCHANGE	XBUD
ITALY	BORSA ITALIANA S.P.A.	XMIL
JAPAN	JAPAN EXCHANGE GROUP	XJPX
NETHERLANDS	CBOE EUROPE EQUITIES - EUROPEAN EQUITIES (NL)	CCXE
NETHERLANDS	EURONEXT - EURONEXT AMSTERDAM	XAMS
NORWAY	OSLO BORS	XOSL
POLAND	WARSAW STOCK EXCHANGE	XWAR
ROMANIA	SPOT REGULATED MARKET - BVB	XBSE
SINGAPORE	SINGAPORE EXCHANGE	XSES
SOUTH AFRICA	JOHANNESBURG STOCK EXCHANGE	XJSE
SWITZERLAND	SIX SWISS EXCHANGE	XSWX
UNITED KINGDOM	ICE FUTURES EUROPE	IFEU
UNITED KINGDOM	LONDON STOCK EXCHANGE	XLON
UNITED STATES OF AMERICA	BANK OF AMERICA - MERRILL LYNCH INSTINCT X ATS	BAML
UNITED STATES OF AMERICA	CBOE GLOBAL MARKETS INC.	XCBO
UNITED STATES OF AMERICA	CBOE GLOBAL MARKETS INC.	XCBO
UNITED STATES OF AMERICA	CHICAGO BOARD OF TRADE	XCBT
UNITED STATES OF AMERICA	CHICAGO MERCANTILE EXCHANGE	XCME
UNITED STATES OF AMERICA	ICE FUTURES U.S.	IFUS
UNITED STATES OF AMERICA	INTELLIGENTCROSS	INCR
UNITED STATES OF AMERICA	INVESTORS EXCHANGE	IEXG
UNITED STATES OF AMERICA	LEVEL ATS	LEVL
UNITED STATES OF AMERICA	MEMX LLC EQUITIES	MEMX
UNITED STATES OF AMERICA	NASDAQ - ALL MARKETS	XNAS
UNITED STATES OF AMERICA	NEW YORK STOCK EXCHANGE, INC.	XNYS
UNITED STATES OF AMERICA	UBS ATS	UBSA
UNITED STATES OF AMERICA	VIRTU AMERICAS LLC	VUSA