



MIFID II – RTS 28

INFORMATION ON THE TOP FIVE EXECUTION VENUES AND QUALITY OF EXECUTION OBTAINED FOR THE CALENDAR YEAR 2020

MiFID II (EU Directive 2014/65) and RTS (Regulatory Technical Standard) 28 (2017/576) place obligations on brokers to publish information about the execution venues they have chosen to execute client business. Here is a link to the Regulation:

<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017R0576&from=EN>

Whilst AMT is therefore producing this information in accordance with these requirements, we believe that this will be of limited use to clients and prospective clients of AMT. This is because AMT executes business only in accordance with instructions from clients. We operate in a very limited field of metal trading only, and for base metal business, this is almost exclusively to be executed on the London Metal Exchange (LME) or, if a request for OTC trading has been made, by relation to the terms and prices of LME trading (which also involve fees payable to the LME for use of their proprietary pricing information). If any other exchanges or venues are used in the future, this will only be as a result of discussion and direction by clients.

Here is the table from Annex II of RTS 28:

In addition to providing the table above, we are also required to provide information which is set out in Article 3, para 3 of the Regulation. These requirements are taken directly from the Regulation and are reproduced below with answers from AMT as follows –

RTS 28, Article 3.3

3. Investment firms shall publish for each class of financial instruments, a summary of the analysis and conclusions they draw from their detailed monitoring of the quality of execution obtained on the execution venues where they executed all client orders in the previous year.

The information shall include:

- (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;

AMT believes that most clients consider the price to be the most important factor. Other factors are usually those that will just have an effect upon the price. More information on this subject is given in AMT's Order Execution Policy which may be found in the Regulatory section, on AMT's website –

https://docs.wixstatic.com/ugd/bfe858_016a8c1eb0084c07a88be9ea9481a30c.pdf

- (b) a description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders;

AMT has no close links, conflicts of interest or common ownership with the LME or any other exchange or execution venue. More information about conflicts of interest may be found in AMT's Conflicts of Interest Policy which may be found in the Regulatory section, on AMT's website –

https://docs.wixstatic.com/ugd/bfe858_5c93981314ac4f618ec6521d1c5a178f.pdf

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

None – other than those which might be made generally available to members by the LME.

- (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;

Not applicable

- (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;

There is no difference.

(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; AMT does not deal with retail clients.

- (f) 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;

AMT makes use of information published by the LME in order to assess the quality of execution of its client business. As virtually all AMT's business is executed on the LME and there is no venue providing similar instruments, it is not possible to compare information provided by other Exchanges or trading venues.

(g) 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.

Not applicable