|  |  |
| --- | --- |
| Legal Entity | JPMorgan Chase Bank, N.A. - London Branch (7H6GLXDRUGQFU57RNE97) |
| Class of Instrument | Equities - Shares & Depositary Receipts |
| Summary of Analysis | |
| For the year of 2018 JPMorgan Chase Bank, N.A. – London Branch’s Agency Securities Lending business operated in an agency capacity. Client orders are defined by the contractual arrangements (Securities Lending Agreement), a ‘standing order’ is received by every in-scope client prior to their entry into the securities lending programme.  For the Lending desk, Best Execution was monitored by performing post trade checks using exception reporting whereby current fees/rebates of open loans are compared to rates supplied by a third party vendor transactions to identify outliers. For all in scope transactions, the review found that that the obligation of Best Execution was met and that the correct decision making process was followed. | |
| Relative importance given to execution factors & other considerations | Please refer to Execution Policy [J.P. Morgan EMEA Securities Services: Execution Policy Appendix 4](https://www.jpmorgan.com/directdoc/MiFIDii-appendix4-CFS-policy.pdf). In this policy, page 7 details the considerations for the key execution factors and page 11 details the factors affecting Agency Lending choice of execution venues. |
| Execution venue close links / conflicts of interest / common ownerships | JPMorgan Chase Bank, N.A. - London Branch and its affiliates held a direct interest in EquiLend Holdings LLC which is the parent company of EquiLend LLC and EquiLend Europe Limited (together “EquiLend”) for the majority of 2018. JPMorgan Chase Bank, N.A. - London Branch and its affiliates were represented on the board of directors of EquiLend during the course of 2018. |
| Specific execution venue arrangements | JPMorgan Chase Bank, N.A. - London Branch is charged an annual participation fee by EquiLend for the use of its platform and related services. |
| Changes to execution venues | The list of execution venues can be found at [List of Execution Venues - Appendix 1](https://www.jpmorgan.com/jpmpdf/1320747081896.pdf). There have been no changes in the list of execution venues listed in the policy during 2018. |
| Client distinctions | JPMorgan Chase Bank, N.A. - London Branch only deals with Professional clients for the purposes of Best Execution. |
| Use of data/tools relating to the quality of execution | JPMorgan Chase Bank, N.A. - London Branch assessed the fairness of pricing of loans subject to Best Execution by comparing open loan fees and rebates to rates supplied by third party vendors |
| Use of consolidated tape provider output or other algorithms to assess execution performances | Not Applicable |

|  |  |
| --- | --- |
| Legal Entity | JPMorgan Chase Bank, N.A. - London Branch (7H6GLXDRUGQFU57RNE97) |
| Class of Instrument | Debt instruments: Bonds |
| Summary of Analysis | |
| For the year of 2018 JPMorgan Chase Bank, N.A. – London Branch’s Agency Securities Lending business operated in an agency capacity. Client orders are defined by the contractual arrangements (Securities Lending Agreement), a ‘standing order’ is received by every in-scope client prior to their entry into the securities lending programme.  For the Lending desk, Best Execution was monitored by performing post trade checks using exception reporting whereby current fees/rebates of open loans are compared to rates supplied by a third party vendor transactions to idetify outliers. For all in scope transactions, the review found that that the obligation of Best Execution was met and that the correct decision making process was followed. | |
| Relative importance given to execution factors & other considerations | Please refer to Execution Policy [J.P. Morgan EMEA Securities Services: Execution Policy Appendix 4](https://www.jpmorgan.com/directdoc/MiFIDii-appendix4-CFS-policy.pdf). In this policy, page 7 details the considerations for the key execution factors and page 11 details the factors affecting Agency Lending choice of execution venues. |
| Execution venue close links / conflicts of interest / common ownerships | JPMorgan Chase Bank, N.A. - London Branch and its affiliates held a direct interest in EquiLend Holdings LLC which is the parent company of EquiLend LLC and EquiLend Europe Limited (together “EquiLend”) for the majority of 2018. JPMorgan Chase Bank, N.A. - London Branch and its affiliates were represented on the board of directors of EquiLend during the course of 2018. |
| Specific execution venue arrangements | JPMorgan Chase Bank, N.A. - London Branch is charged an annual participation fee by EquiLend for the use of its platform and related services. |
| Changes to execution venues | The list of execution venues can be found at  [List of Execution Venues - Appendix 1](https://www.jpmorgan.com/jpmpdf/1320747081896.pdf). There have been no changes in the list of execution venues listed in the policy during 2018. |
| Client distinctions | JPMorgan Chase Bank, N.A. - London Branch only deals with Professional clients for the purposes of Best Execution. |
| Use of data/tools relating to the quality of execution | JPMorgan Chase Bank, N.A. - London Branch assessed the fairness of pricing of loans subject to Best Execution by comparing open loan fees and rebates to rates supplied by third party vendors. |
| Use of consolidated tape provider output or other algorithms to assess execution performances | Not Applicable |

|  |  |
| --- | --- |
| Legal Entity | JPMorgan Chase Bank, N.A. - London Branch (7H6GLXDRUGQFU57RNE97) |
| Class of Instrument | Debt instruments: Money markets instruments |
| Summary of Analysis | |
| For the year of 2018 JPMorgan Chase Bank, N.A. – London Branch’s Agency Securities Lending business operated in an agency capacity. Client orders are defined by the contractual arrangements (Securities Lending Agreement), a ‘standing order’ is received by every in-scope client prior to their entry into the securities lending programme.  For the Lending desk, Best Execution was monitored by performing post trade checks using exception reporting whereby current fees/rebates of open loans are compared to rates supplied by a third party vendor transactions to identify outliers. For all in scope transactions, the review found that that the obligation of Best Execution was met and that the correct decision making process was followed. | |
| Relative importance given to execution factors & other considerations | Please refer to Execution Policy [J.P. Morgan EMEA Securities Services: Execution Policy Appendix 4](https://www.jpmorgan.com/directdoc/MiFIDii-appendix4-CFS-policy.pdf). In this policy, page 7 details the considerations for the key execution factors and page 11 details the factors affecting Agency Lending choice of execution venues. |
| Execution venue close links / conflicts of interest / common ownerships | JPMorgan Chase Bank, N.A. - London Branch and its affiliates held a direct interest in EquiLend Holdings LLC which is the parent company of EquiLend LLC and EquiLend Europe Limited (together “EquiLend”) for the majority of 2018. JPMorgan Chase Bank, N.A. - London Branch and its affiliates were represented on the board of directors of EquiLend during the course of 2018. |
| Specific execution venue arrangements | JPMorgan Chase Bank, N.A. - London Branch is charged an annual participation fee by EquiLend for the use of its platform and related services. |
| Changes to execution venues | The list of execution venues can be found at [List of Execution Venues Appendix 1](https://www.jpmorgan.com/jpmpdf/1320747081896.pdf). There have been no changes in the list of execution venues listed in the policy during 2018. |
| Client distinctions | JPMorgan Chase Bank, N.A. - London Branch only deals with Professional clients for the purposes of Best Execution. |
| Use of data/tools relating to the quality of execution | JPMorgan Chase Bank, N.A. - London Branch assessed the fairness of pricing of loans subject to Best Execution by comparing open loan fees and rebates to rates supplied by third party vendors. |
| Use of consolidated tape provider output or other algorithms to assess execution performances | Not Applicable |

|  |  |
| --- | --- |
| Legal Entity | JPMorgan Chase Bank, N.A. - London Branch(7H6GLXDRUGQFU57RNE97) |
| Class of Instrument | Currency derivatives: Swaps, forwards, and other currency derivatives |
| Summary of Analysis | |
| For the year of 2018 for eCommerce Orders, JPMorgan Chase Bank, N.A. - London Branch collated quoted bid/offer spreads over a rolling time frame, and analysed this in comparison to completed leave transactions to identify outliers. For all in scope transactions, JPMorgan Chase Bank, N.A. - London Branch was able to demonstrate that Best Execution was provided. Clients direct their orders to JPMorgan Chase Bank, N.A. - London Branch to execute as principal and we therefore treat all orders as directed as we are the sole execution venue.  For the year of 2018 for FX Services Orders, JPMorgan Chase Bank, N.A. - London Branch used internal and/or external market data to benchmark against execution pricing. Exceptions were monitored through a management review and governance framework. For all in scope transactions, JPMorgan Chase Bank, N.A. - London Branch was able to demonstrate that Best Execution was provided. Clients direct their orders to JPMorgan Chase Bank, N.A. - London Branch to execute as principal and we therefore treat all orders as directed as we are the sole execution venue. | |
| Relative importance given to execution factors & other considerations | As per Appendix 5 of JPMorgan’s Execution Policy price is the most important factor. After price, the likelihood of execution and the ability to fill a client’s order in its entirety or at least a substantial part of it – are the most important factors. This latter factor increases in importance in situations where access to liquidity in the relevant instrument is constrained in some way – for example, if the currencies of the transaction are illiquid, or if the limit price provided is not marketable. |
| Execution venue close links / conflicts of interest / common ownerships | JPMorgan Chase Bank, N.A. - London Branch is a fully owned subsidiary of JPMorgan Chase & Co. |
| Specific execution venue arrangements | JPMorgan Chase Bank, N.A. - London Branch is the sole execution venue. |
| Changes to execution venues | Not Applicable |
| Client distinctions | JPMorgan Chase Bank, N.A. - London Branch only deals with Professional clients for the purposes of Best Execution. |
| Use of data/tools relating to the quality of execution | As per Appendix 5 of J.P. Morgan’s Execution Policy, a range of market data sources are utilised by J.P. Morgan’s e-Commerce business in the formation of principal risk prices. Both readily available market data and J.P. Morgan internal transaction data are used to assess the quality of execution for in-scope orders. Thresholds comparing execution pricing with such data are set by J.P. Morgan to monitor execution quality. The results of Best Execution monitoring are reviewed by control-related functions within J.P. Morgan on an ongoing basis and are discussed by J.P. Morgan management and control functions within a committee that has been established for the purpose of governing Best Execution. |
| Use of consolidated tape provider output or other algorithms to assess execution performances | Not Applicable |

|  |  |
| --- | --- |
| Legal Entity | JPMorgan Chase Bank, N.A. - London Branch (7H6GLXDRUGQFU57RNE97) |
| Class of Instrument | Other instruments |
| Summary of Analysis | |
| **JPMorgan Chase Bank, N.A. - London Branch: Agency Securities Lending business (“Agency Securities Lending”):**  For the year of 2018 JPMorgan Chase Bank, N.A. – London Branch’s Agency Securities Lending business operated in an agency capacity. Client orders are defined by the contractual arrangements (Securities Lending Agreement), a ‘standing order’ is received by every in-scope client prior to their entry into the securities lending programme.  For the Lending desk, Best Execution was monitored by performing post trade checks using exception reporting whereby current fees/rebates of open loans are compared to rates supplied by a third party vendor transactions to identify outliers. For all in scope transactions, the review found that that the obligation of Best Execution was met and that the correct decision making process was followed.  **JPMorgan Chase Bank, N.A. - London Branch: Fund Order Routing and Settlement Services business (“FORSS”):**  Within the FORSS product offering, currently an execution will arise on client instructions to subscribe for, or redeem, units in certain funds. In the year 2018, our review found the obligation of Best Execution was met in each case. The application was monitored by JPMorgan Chase Bank, N.A. - London on a regular basis, through post-trade controls performed by the business which were monitored at the Securities Services Best Execution forum. This monitoring identified execution situations which are potentially subject to Best Execution and also monitored the correct application of the decision making process.  **JPMorgan Chase Bank, N.A. - London Branch: Liquidity Services (“Liquidity Services”):**  JPMorgan Chase Bank, N.A. - London Branch provides its Securities Services clients with a market leading technology platform for automated investment of clients’ excess cash into money market funds. The sweep is based on a client legal agreement which stipulates the investment rules, set by each client.  The daily automated subscriptions or redemptions into/from the chosen money market funds are performed based on these rules in conjunction with the clients’ cash account balances. During 2018 there have not been any material incidents to jeopardise the Bank’s Best Execution obligations. Monitoring of execution and follow up reconciliation seek to ensure that speed of execution is maintained at the expected level. | |
| Relative importance given to execution factors & other considerations | Applicable to Agency Lending, FORSS and Liquidity Services, please refer to Execution Policy [J.P. Morgan EMEA Securities Services: Execution Policy Appendix 4](https://www.jpmorgan.com/directdoc/MiFIDii-appendix4-CFS-policy.pdf). In this policy, page 7 details the considerations for the key execution factors and page 11 details the factors affecting choice of execution venues. |
| Execution venue close links / conflicts of interest / common ownerships | **Agency Securities Lending:**  JPMorgan Chase Bank, N.A. - London Branch and its affiliates held a direct interest in EquiLend Holdings LLC which is the parent company of EquiLend LLC and EquiLend Europe Limited (together “EquiLend”) for the majority of 2018. JPMorgan Chase Bank, N.A. - London Branch and its affiliates were represented on the board of directors of EquiLend during the course of 2018.  **FORSS:**  With respect to the FORSS product offering, please note that some of the investment vehicles that J.P. Morgan Chase Bank, N.A. - London makes available may include investment funds of our affiliates.  **Liquidity Services:**  Not Applicable |
| Specific execution venue arrangements | **Agency Securities Lending:**  JPMorgan Chase Bank, N.A. - London Branch is charged an annual participation fee by EquiLend for the use of its platform and related services. |
| Changes to execution venues | The list of execution venues can be found at [List of Execution Venues Appendix 1](https://www.jpmorgan.com/jpmpdf/1320747081896.pdf). There have been no changes in the list of execution venues listed in the policy during 2018.  **FORSS & Liquidity Services:**  Not Applicable |
| Client distinctions | JPMorgan Chase Bank, N.A. - London Branch only deals with Professional clients for the purposes of Best Execution. |
| Use of data/tools relating to the quality of execution | **Agency Securities Lending:**  JPMorgan Chase Bank, N.A. - London Branch assessed the fairness of pricing of loans subject to Best Execution by comparing open loan fees and rebates to rates supplied by third party vendors.  **FORSS & Liquidity Services:**  The quality of the execution is monitored through the Bank’s automated systems which manage and reconcile executions of orders against execution factors relevant to a particular line of business as further outlined in the EMEA Securities Services Execution Policy. Any exceptions or errors identified are managed by a dedicated team within a reasonable time. On a periodic basis, Best Execution metrics are compiled and consolidated for a particular line of business for review at the relevant business control forum. |
| Use of consolidated tape provider output or other algorithms to assess execution performances | Not Applicable |

|  |  |
| --- | --- |
| Legal Entity | JPMorgan Chase Bank, N.A. - London Branch (7H6GLXDRUGQFU57RNE97) |
| Class of Instrument | Exchange traded products (Exchange traded funds, exchange traded notes and exchange traded commodities) |
| Summary of Analysis | |
| For the year of 2018 JPMorgan Chase Bank, N.A. – London Branch’s Agency Securities Lending business operated in an agency capacity. Client orders are defined by the contractual arrangements (Securities Lending Agreement), a ‘standing order’ is received by every in-scope client prior to their entry into the securities lending programme.  For the Lending desk, Best Execution was monitored by performing post trade checks using exception reporting whereby current fees/rebates of open loans are compared to rates supplied by a third party vendor transactions to identify outliers. For all in scope transactions, the review found that that the obligation of Best Execution was met and that the correct decision making process was followed. | |
| Relative importance given to execution factors & other considerations | Please refer to Execution Policy [J.P. Morgan EMEA Securities Services: Execution Policy Appendix 4](https://www.jpmorgan.com/directdoc/MiFIDii-appendix4-CFS-policy.pdf). In this policy, page 7 details the considerations for the key execution factors and page 11 details the factors affecting Agency Lending choice of execution venues. |
| Execution venue close links / conflicts of interest / common ownerships | JPMorgan Chase Bank, N.A. - London Branch and its affiliates held a direct interest in EquiLend Holdings LLC which is the parent company of EquiLend LLC and EquiLend Europe Limited (together “EquiLend”) for the majority of 2018. JPMorgan Chase Bank, N.A. - London Branch and its affiliates were represented on the board of directors of EquiLend during the course of 2018. |
| Specific execution venue arrangements | JPMorgan Chase Bank, N.A. - London Branch is charged an annual participation fee by EquiLend for the use of its platform and related services. |
| Changes to execution venues | The list of execution venues can be found at [List of Execution Venues - Appendix 1](https://www.jpmorgan.com/jpmpdf/1320747081896.pdf). There have been no changes in the list of execution venues listed in the policy during 2018. |
| Client distinctions | JPMorgan Chase Bank, N.A. - London Branch only deals with Professional clients for the purposes of Best Execution. |
| Use of data/tools relating to the quality of execution | JPMorgan Chase Bank, N.A. - London Branch assessed the fairness of pricing of loans subject to Best Execution by comparing open loan fees and rebates to rates supplied by third party vendors. . |
| Use of consolidated tape provider output or other algorithms to assess execution performances | Not Applicable |

|  |  |
| --- | --- |
| Legal Entity | JPMorgan Chase Bank, N.A. - London Branch(7H6GLXDRUGQFU57RNE97) |
| Class of Instrument | Commodities derivatives and emission allowances derivatives: Other commodities derivatives and emission allowances derivatives |
| Summary of Analysis | |
| **eCommerce Orders**  For the year of 2018 for eCommerce Orders, JPMorgan Chase Bank, N.A. - London Branch collated quoted bid/offer spreads over a rolling time frame, and analysed this in comparison to completed leave transactions to identify outliers. For all in scope transactions, JPMorgan Chase Bank, N.A. - London Branch was able to demonstrate that Best Execution was provided. Clients direct their orders to JPMorgan Chase Bank, N.A. - London Branch to execute as principal and we therefore treat all orders as directed as we are the sole execution venue.  **Structured Products**  The Commodities Derivative products that have been subject to Best Execution are products falling under the Relevant Structured Products section of Appendix 5 to the J.P. Morgan Execution Policy. Due to the nature of JPMorgan Chase Bank, N.A. - London Branch’s business, it owed Best Execution in limited circumstances for Commodities Derivatives.  JPMorgan Chase Bank, N.A. – London Branch has implemented procedures in order to, on a regular basis, monitor the application of Best Execution to Commodity Derivatives through post-trade controls. This monitoring will identify execution situations which are potentially subject to Best Execution and will also monitor the correct application of the decision making process. In the year 2018, the review found that that the obligation of Best Execution was met and that the correct decision making process was followed. | |
| Relative importance given to execution factors & other considerations | **eCommerce Orders**  As per Appendix 5 of J.P. Morgan’s Execution Policy price is the most important factor. After price, the likelihood of execution and the ability to fill a client’s order in its entirety – or at least a substantial part of it – are the most important factors. This latter factor increases in importance in situations where access to liquidity in the relevant instrument is constrained in some way – for example, if the currencies of the transaction are illiquid, or if the limit price provided is not marketable.  **Structured Products**  The importance given in situations in which JPMorgan Chase Bank, N.A. - London Branch owes Best Execution is set out under the Relevant Structured Products section of Appendix 5 to the J.P. Morgan Execution Policy. |
| Execution venue close links / conflicts of interest / common ownerships | JPMorgan Chase Bank, N.A. - London Branch is a fully owned subsidiary of JPMorgan Chase & Co. |
| Specific execution venue arrangements | JPMorgan Chase Bank, N.A. - London Branch is the sole execution venue. |
| Changes to execution venues | Not Applicable |
| Client distinctions | JPMorgan Chase Bank, N.A. - London Branch only deals with Professional clients for the purposes of Best Execution. |
| Use of data/tools relating to the quality of execution | **eCommerce Orders**  As per Appendix 5 of J.P. Morgan’s Execution Policy, both readily available market data and J.P. Morgan internal transaction data can be used to assess the quality of execution for in-scope orders. Thresholds comparing execution pricing with such data are set by J.P. Morgan to monitor execution quality. The results of Best Execution monitoring are reviewed by control-related functions within J.P. Morgan on an ongoing basis and are discussed by J.P. Morgan management and control functions within a committee that has been established for the purpose of governing Best Execution  **Structured Products**  JPMorgan Chase Bank, N.A. - London Branch assessed the fairness of pricing of transactions subject to Best Execution by reviewing relevant pricing considerations and available market data in respect of the time of execution. |
| Use of consolidated tape provider output or other algorithms to assess execution performances | Not Applicable |

|  |  |
| --- | --- |
| Legal Entity | JPMorgan Chase Bank, N.A. - London Branch (7H6GLXDRUGQFU57RNE97) |
| Class of Instrument | Debt Instruments: Bonds (Non SFTs) |
| Summary of Analysis | |
| For the year of 2018 JPMorgan Chase Bank, N.A. – London Branch’s Agency Securities Lending business operated in an agency capacity. Client orders are defined by the contractual arrangements (Securities Lending Agreement), a ‘standing order’ is received by every in-scope client prior to their entry into the securities lending programme. For the Cash Reinvestment Desk, transactions were executed within the Client Investment Guidelines by evaluating Term Investment executions against different external reference prices. For all in scope transactions, the review found that that the obligation of Best Execution was met and that the correct decision making process was followed. | |
| Relative importance given to execution factors & other considerations | Please refer to Execution Policy [J.P. Morgan EMEA Securities Services: Execution Policy Appendix 4](https://www.jpmorgan.com/directdoc/MiFIDii-appendix4-CFS-policy.pdf). In this policy, page 7 details the considerations for the key execution factors and page 11 details the factors affecting Agency Lending choice of execution venues. |
| Execution venue close links / conflicts of interest / common ownerships | Not Applicable |
| Specific execution venue arrangements | Not Applicable |
| Changes to execution venues | The list of execution venues can be found at [List of Execution Venues Appendix 1](https://www.jpmorgan.com/jpmpdf/1320747081896.pdf). |
| Client distinctions | JPMorgan Chase Bank, N.A. - London Branch only deals with Professional clients for the purposes of Best Execution. |
| Use of data/tools relating to the quality of execution | JPMorgan Chase Bank, N.A. - London Branch assessed the fairness of pricing of transactions subject to Best Execution by evaluating Term investment executions against different external reference prices. |
| Use of consolidated tape provider output or other algorithms to assess execution performances | Not applicable |

|  |  |
| --- | --- |
| Legal Entity | JPMorgan Chase Bank, N.A. - London Branch (7H6GLXDRUGQFU57RNE97) |
| Class of Instrument | Credit Derivatives: Other Credit Derivatives |
| Summary of Analysis | |
| The Credit Derivatives products that have been subject to Best Execution are products falling under the Relevant Structured Products section of Appendix 5 to the J.P. Morgan Execution Policy. Due to the nature of JPMorgan Chase Bank, N.A.’s business, it owed Best Execution in limited circumstances for Credit Derivatives.    JPMorgan Chase Bank, N.A. - London Branch’s has implemented procedures in order to, on a regular basis, monitor the application of Best Execution to Credit Derivatives through post-trade controls. This monitoring will identify execution situations which are potentially subject to Best Execution and will also monitor the correct application of the decision making process. In the year 2018, the review found that that the obligation of Best Execution was met and that the correct decision making process was followed. | |
| Relative importance given to execution factors & other considerations | The importance given in situations in which JPMorgan Chase Bank, N.A. - London Branch owes Best Execution is set out under the Relevant Structured Products section of Appendix 5 to the J.P. Morgan Execution Policy. |
| Execution venue close links / conflicts of interest / common ownerships | JPMorgan Chase Bank, N.A. - London Branch is a fully owned subsidiary of JPMorgan Chase & Co. |
| Specific execution venue arrangements | JPMorgan Chase Bank, N.A. - London Branch is the sole execution venue. |
| Changes to execution venues | Not Applicable |
| Client distinctions | JPMorgan Chase Bank, N.A. - London Branch only deals with Professional clients for the purposes of Best Execution. |
| Use of data/tools relating to the quality of execution | JPMorgan Chase Bank, N.A. - London Branch assessed the fairness of pricing of transactions subject to Best Execution by reviewing relevant pricing considerations and available market data in respect of the time of execution. |
| Use of consolidated tape provider output or other algorithms to assess execution performances | Not Applicable |