

Blackstone Ireland Limited (“BIL”)

Best Execution (RTS 28) Report for the period ending 31 December 2020

Structured Finance (CLO Equity and Debt)

In accordance with Article 3(3) of Commission Delegated Regulation (EU) 2017/576 (RTS 28), BIL sets out below a summary of the analysis and conclusions drawn from BIL’s detailed monitoring of the quality of execution obtained on the execution venues where it executed all client orders in the year ended 31 December 2020. This report is specific to the quality of execution obtained in respect of Structured Finance Instruments.

Requirement under Article 3(3)	BIL response
<p>(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</p>	<p>When executing orders, BIL will take all sufficient steps to obtain the best possible result under the circumstances for its clients, taking into account the following execution factors:</p> <ul style="list-style-type: none"> (a) <i>Price</i> – this is the price at which a transaction in a financial instrument is executed; (b) <i>Costs</i> – including internal and external costs such as venue costs; (c) <i>Speed</i> – the length of time it takes to execute an order or transaction; (d) <i>Likelihood of execution and settlement</i> – the probability that the order or transaction can be completed; (e) <i>Size</i> – the size of the order or transaction to be executed, which may impact the execution price obtained, depending on the liquidity of the financial instrument; (f) <i>Nature</i> – the type of order; and (g) <i>Any other factor that BIL considers relevant to the execution of the order</i> – including, but not limited to, the complexity of the financial instrument, the liquidity of the relevant market and operational risks associated with the financial instrument. <p>Generally speaking, BIL will regard price as the most significant execution factor in the execution of a client’s order. In some circumstances, BIL may use its discretion to place a higher importance on one or more of the other execution factors (set out above) in order to provide client(s) with the best possible result.</p> <p>Further detail is as set out in the applicable best execution policies and procedures.</p>

Requirement under Article 3(3)	BIL response
(b) a description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders	BIL does not have any close links, conflicts of interest or common ownerships with respect to any execution venues used to execute orders. Any potential conflicts of interest which may arise are handled in accordance with BIL's Conflicts of Interest Policy.
(c) a description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received	BIL does not have any arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received. Any potential conflicts of interest which may arise are handled in accordance with BIL's Conflicts of Interest Policy.
(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	No changes have been made to the execution venues.
(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	All BIL clients are treated the same.
(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	This is not applicable to BIL, as it does not execute retail client orders.
(g) 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 (RTS 27)	BIL trading is subject to best execution analysis utilising a transaction cost analysis (TCA) tool supported by the external provider Markit. For Structured Finance Instruments trading, the BIL best execution analysis highlights cases where the execution price is greater/less than the last far touch execution provided by IHS Markit for buys/sells using a 3% threshold.
(h) 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	This is not applicable as no such data has yet been published under Article 65 of Directive 2014/65/EU.