



## Payden Global SIM S.p.A.

### Introduction:

Payden Global SIM S.p.A. (the "SIM" or the "Firm") hereby complies with the disclosure requirements set forth in **Regulation (EU) 2017/576 of June 8, 2016** supplementing Directive 2014/65/EU of the European Parliament and of the Council regarding regulatory technical standards on the annual publication by investment firms of information on the identity of execution venues and the quality of execution.

The investment firm shall disclose the top five execution venues by trading volume with respect to all client orders executed for each of the classes of financial instruments listed in Annex I.

Professional client information shall be published in the format shown in **Annex II, Table 2**. The publication shall contain the following information:

- a. class of financial instrument;
- b. name and identifier of the execution venue;
- c. volume of client orders executed at the execution venue, expressed as a percentage of the total volume of executions;
- d. number of client orders executed at the execution venue, expressed as a percentage of the total number of orders executed;
- e. percentage of passive<sup>1</sup> and aggressive orders<sup>2</sup> among the executed orders in (d);
- f. percentage of oriented<sup>3</sup> orders among the orders referred to in (d);
- g. indication whether the investment firm executed, on average, less than one trade per business day in the relevant class of financial instruments in the previous year.

### INFORMATION ON THE FIRST FIVE EXECUTION VENUES

Information on the first five execution venues related to professional clients is published in the format shown in the tables below, as provided for in **Article 3, paragraph 1 of EU Delegated Regulation 2017/576 of June 8, 2016 supplementing Directive 2014/65/EU** with regard to regulatory technical standards on annual publication by investment firms of information on the identity of execution venues and execution quality.

### Best Execution policy and procedures

Payden Global SIM's policy is to take all sufficient steps to achieve best execution on all trades. In seeking best execution, the goal is to obtain the best possible result for the client, given the circumstances at the time of the trade, the nature of the trade, and the application of the broker selection criteria set forth below. Trading is conducted by the Firm's parent company, Payden & Rygel ("P&R"), on the Firm's behalf. Payden & Rygel's traders may only execute with brokers that meet the criteria below and are on the Payden & Rygel approved broker list.

The Payden & Rygel Best Execution Committee ("BEC") monitors overall execution practices, using the below criteria.

The Firm requires P&R to consider all relevant execution factors, including:

**Price and Costs:** Wherever possible, traders are expected to obtain competitive prices before executing trades. All else equal, traders are expected to execute all trades at the best price. Some exceptions may arise in cases of client-directed trades to specific broker/dealers. In cases where competitive prices may not be available on a timely basis, traders are expected to use their best judgment and market knowledge to negotiate the best possible price and/or timing of execution. Commissions on exchange-traded securities must be reasonable and monitored regularly to ensure competitive costs.

**Liquidity and Depth:** The broker/dealer must demonstrate the ability to provide liquidity in the specific market area. Depth in the trading area is also important, as demonstrated by market presence, capacity, sustainability and commitment to the business. The BEC also considers the broker/dealer's market-making ability and willingness, i.e., its ability and willingness to make a two-way market in difficult market conditions, even if it requires putting its own capital at risk. Access to the market and speed of execution are important factors in evaluating this criterion.

**Market Expertise:** The broker/dealer should demonstrate expertise in executing trades in the relevant market.

**Operational Efficiency:** Operational efficiency is an important criterion in evaluating a broker/dealer since settlement problems such as failed trades or inability to process the transactions accurately and efficiently can be costly.

**Quality of Service:** This qualitative criterion is based on Payden & Rygel's experience with the responsiveness and flexibility of the broker/dealer and its attention to specific execution needs.

**Other Considerations:** The characteristics of the client and any special characteristics of the client trade itself are relevant. Further, the characteristics of the financial instrument that will be traded are relevant, as are the characteristics of the venues on which the trade may be executed. All client accounts are treated equally, except clients that instruct the specific brokers with which we must execute, or restrict us from trading with certain brokers we otherwise would have selected, under the circumstances.

Quarterly, the BEC reviews the approved brokers and venues, and may solicit recommendations from the various trading desks for brokers or venues to be added to or deleted from the list. The BEC assesses such proposed additions or deletions based on the criteria set forth above, and reviews to confirm there are no potential conflicts of interest with respect to the SIM or the trader or traders requesting the addition. Annually, the BEC provides the approved broker list to Payden & Rygel's Investment Policy Committee for review.

Payden & Rygel traders must execute with brokers and venues on the approved list. The traders must communicate any relevant issues that may impact the quality of execution directly to the appropriate trading manager. Traders are expected to be familiar with the Firm's Best Execution Policy and to adhere to it on all trading activity. The Best Execution Policy is reviewed to confirm it allows the SIM to achieve consistently the best possible result for its clients, and updates to the Policy are made on an annual basis

The BEC meets quarterly. It reviews relevant trading reports and other documents, interviews traders on a rotational basis, and interviews the settlements and other middle office personnel with respect to broker operational matters, including recurring settlement issues with specific brokers.

Payden Global SIM SpA considers the applicability of data published under Commission Delegated Regulation (EU) 2017/575 by the trading venues Payden & Rygel has used, those of its counterparties which operate as systematic internalisers, and a sample of reports published by other venues which are not currently utilised.

The SIM investment team works closely with the Trading Desk and may direct specific execution factors to be prioritised, given the nature of the security, market conditions, and the specific characteristics of the trade. In those circumstances, the Trader executes consistent with the directions of the Portfolio Manager or Strategist. In the absence of specific direction from the SIM Investment team, the Trader determines the importance of each execution factor based on the nature of the trade and market conditions.

### Information on Financial Instrument Classes

This report includes the following instrument classes :

#### Equities

#### Debt instruments

#### Interest rate derivatives

#### Currency derivatives

#### RTS 28 Analysis

Disclosure of the top five brokers by volume traded is reported in machine-readable format on our website at: [Payden & Rygel Investment Management](#)

With respect to all financial instrument classes:

	Summary of Analysis
Close links, conflicts of interest and common ownership with respect to execution venues.	The firm has no close links, conflicts of interest, nor common ownership with any brokers and/or venues.
Specific arrangements with execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received.	The firm has no such arrangements.
Factors leading to a change in the list of execution venues listed in the order execution policy.	New brokers were added to the approved broker list during the period.  The factors considered in adding or removing brokers from the list, as well as the ongoing monitoring of the list, are included in the Payden & Rygel Best Execution Policy described above. These factors were applied objectively during the

	period, consistent with the Best Execution Policy.
Differentiation across client categories.	Not Applicable – All the firm's clients are professional clients.
Use of consolidated tape provider output.	Not Applicable – There were no such CTPs available in Europe during the period to which this disclosure relates.

The Firm requires the following execution factors to be deemed applicable to each asset class when executing orders with brokers. The importance placed on each execution factor may differ for any transaction, depending on the characteristics of the order, the availability of liquidity sources and other prevailing market conditions. The analysis below summarizes the typical relative importance of execution factors.

- Price
- Speed of execution
- Likelihood of settlement and other operational performance
- Liquidity in the market of the security
- Size of the transaction
- Costs
- The ability to remain anonymous in the market
- Counterparty risk
- Other characteristics of the order determined to be relevant

## **Debt Instruments – Bonds and Money Markets**

### **Equities:**

Payden & Rygel is not a member of any regulated markets. As a result, equity orders are placed with a broker for execution on a regulated market. Payden & Rygel has negotiated standardized commission rates with several brokers to facilitate the execution of these equity transactions. The most significant factors influencing execution are price, size of order and specific client directives. Price will generally receive a high relative importance given the liquidity of the equity marketplace. However, the SIM may determine that other execution factors may be more important than price in order to deliver the best possible client result, dependent on the specific circumstances at the time of the transaction. The relative importance given to the execution factors described above is consistent with the SIM's Best Execution Policy.

## **Structured Finance Instruments**

In executing Bond, Money Market and Structured Finance orders, P&R considers factors dependent on the nature of the order, security characteristics, and market conditions at the time of order. The most significant factors are typically price, speed of response and execution and operational capabilities, including likelihood of settlement. Trade inquiry is directly with brokers using trading venues and direct requests for competing quotes. Prices are compared to market rates and other data as available. Traders typically request quotes from multiple brokers. However, the number of brokers from which a trader seeks quotes may differ based on the trader's judgement or based on the characteristics of the trade. For example, if seeking to transact a large position or if it is known there is limited liquidity in a security, it may not be in the clients' best interest to seek multiple quotes.

The SIM participates in new issuance of bonds. Purchases of bonds at issuance is directly with a single broker or market maker. As such, there is often no choice as to the broker with which to execute. In these circumstances, the trader and the SIM investment team coordinate to determine the price at which we are willing to participate in the issuance.

Debt securities are traded OTC, so operational efficiency is considered in selecting brokers for execution. Price will generally receive a high relative importance. However, the SIM may determine that other execution factors as described above may be more important than price in order to deliver the best possible client result, dependent on the specific circumstances at the time of the transaction.

Execution reports are reviewed on by the Best Execution Committee. Any concerns identified from review of the reports are addressed with the applicable trading team and with the Head of Trading of P&R. Counterparty concentration reports are reviewed by the Firm's Investment Policy Committee.

The relative importance given to the execution factors described above is consistent with the SIM's Best Execution Policy.

### **Interest Rate Derivatives – Futures and options admitted to trading on a trading venue**

Payden Global SIM is not a member of any regulated markets. As a result, orders are placed with a broker for execution on a regulated market. With respect to exchange-traded interest rate derivatives, P&R has negotiated standardized commission rates with several brokers.

The most significant factors are typically price, size of order and specific client directives. Operational efficiencies are generally highly automated. Price will generally receive a high relative importance. However, the SIM may determine that other execution factors may be more important than price in order to deliver the best possible client result, dependent on the specific circumstances at the time of the transaction.

Commissions paid are reviewed quarterly by the Best Execution Committee.

The relative importance given to the execution factors described above is consistent with the SIM's Best Execution Policy.

## **Currency Derivatives - Swaps, forwards, and other currency derivatives**

When dealing in foreign exchange, such as FX forwards or swaps, the execution strategy is determined by various factors, including but not limited to the currency pair, size of the order, time of day and conditions in the market at time of execution. Prior to trading, traders must consider the ability to trade with specific counterparties for each individual client. For over-the-counter (OTC) transactions there must be an ISDA agreement, which is often accompanied by relevant variation margin rule-compliant Credit Support Annexes. The inability to trade with a specific counterparty may impair the trader's ability to achieve a preferred method of execution. Trades may be done on a request for quote (RFQ) basis, or on a competitive basis. In all cases, a pre-trade assessment is conducted by the trader, which includes gathering market data, reviewing different pricing sources and comparing similar or comparable deals. Traders often use an electronic trading platform for either trading or allocating trades done off-platform. The top 5 report includes all activity processed, whether or not the trade was executed electronically.

Depending on the impetus or desired objective for the trade, different execution factors may be prioritized. While most trades will prioritize price and costs, there will be times when speed may be of essence or size may be a larger consideration. Other factors that are frequently considered are the likelihood of execution and settlement, the nature of the order, the ability to remain anonymous in the market, the prevention or controlled limitation of information leakage, the characteristics of the client, the intent of the portfolio manager/s, trading or other restrictions in that specific market and which execution venues may be available. Where appropriate, traders work closely with portfolio managers to determine appropriate method of execution. Otherwise, traders determine the relative importance of execution factors by using their experience and knowledge of the market and conditions at time of execution.

We employ an independent third party to aggregate and analyze FX execution data. The data and transaction cost analysis reports are reviewed regularly by the BEC. Trade performance is compared to benchmark rates that are constructed from market data.

The relative importance given to the execution factors described above is consistent with the SIM's Best Execution Policy.

### **Conflict of Interest**

There are no close ties, conflicts of interest, proprietary entanglements, specific agreements with regard to payments made or received and discounts, rebates or non-monetary benefits between the SIM and the execution venues used, outside the standard conditions.

Similarly, Payden & Rygel pays the brokers selected by it the commissions defined by them and does not accept incentives from them.

**Tabella 2 – Professional Clients**

Class of Instrument	Equities				
Notification if < 1 average trade per business day in the previous year	Yes				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of orders	Percentage of directed orders
INSTINET CORP 549300MGMN3RKMU8FT57	41,5%	42,9%	47,6%	40,0%	0%
BTIG LLC 549300GTG9PL6WO3EC51	11,9%	12,3%	11,1%	13,0%	0%
NATWEST MARKETS RR3QWICWWIPCS8A4S074	4,7%	4,3%	1,6%	6,0%	0%
MORGAN STANLEY 4PQUHN3JPFQFN3BB653	4,3%	4,3%	6,3%	3,0%	0%
SOCIETE GENERAL O2RNE8IBXP4R0TD8PU41	2,8%	1,8%	0,0%	3,0%	0%

Class of Instrument	Debt Instruments				
Notification if < 1 average trade per business day in the previous year	No				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
JP MORGAN K6Q0W1PS1L1O4IQL9C32	6,8%	6,1%	7,7%	4,4%	0%
BARCLAYS G5GSEF7VJP5I7OUK5573	6,1%	6,0%	6,6%	5,4%	0%
CITIGROUP GBL M XKZZ2JZF41MRHTR1V493	5,7%	4,4%	3,8%	5,0%	0%
CITIGROUP GBL M MBNUM2BPBDO7JBLYG310	5,3%	4,4%	5,5%	3,2%	0%

JP MORGAN ZBUT11V806EZRVTWT807	4,6%	4,8%	6,7%	2,7%	0%
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Class of Instrument	Interest Rate Derivatives				
Notification if < 1 average trade per business day in the previous year	No				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
GOLDMAN SACHS W22LROWP2IHZNBB6K528	54,2%	65,0%	65,5%	64,5%	0%
JP MORGAN 549300ZK53CNGEEI6A29	29,2%	19,4%	19,8%	18,9%	0%
GOLDMAN SACHS 8IBZUGJ7JPLH368JE346	6,4%	13,2%	12,5%	14,0%	0%
UBS SECURITIES BFM8T61CT2L1QCCEMIK50	4,9%	1,6%	1,5%	1,8%	0%
GOLDMAN SACHS FOR8UP27PHTHYVLBNG30	3,0%	0,4%	0,4%	0,4%	0%

Class of Instrument	Currency Derivatives				
Notification if < 1 average trade per business day in the previous year	No				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
JP MORGAN 549300ZK53CNGEEI6A29	62,8%	52,1%	47,1%	55,5%	0%
GOLDMAN SACHS FOR8UP27PHTHYVLBNG30	36,7%	40,6%	42,2%	39,5%	0%
GOLDMAN SACHS W22LROWP2IHZNBB6K528	0,5%	7,3%	10,8%	0%	0%



Corso Matteotti, 1 - 20121 Milano - Phone +39 02 76067111 - E-mail [benvenuto@payden.com](mailto:benvenuto@payden.com)  
Capitale Sociale euro 1.584.000 i.v. con socio unico. Reg Impr. Uff. di Milano - P.IVA e C.F.:  
11312900969 - Albo SIM n. 305 - REA MI-2593917 - Aderente al Fondo Nazionale di Garanzia

Corso Matteotti, 1 - 20121 Milano - Phone +39 02 76067111 - E-mail [benvenuto@payden.com](mailto:benvenuto@payden.com)  
Capitale Sociale euro 1.584.000 i.v. con socio unico. Reg Impr. Uff. di Milano - P.IVA e C.F.:  
11312900969 - Albo SIM n. 305 - REA MI-2593917 - Aderente al Fondo Nazionale di Garanzia