

30 April 2023

## Analysis of the execution and transmission of the securities orders of OP Financial Group cooperative banks clients in 2022 (conclusions under Article 3(3) of RTS 28)

– Applies to all product categories provided by OP Financial Group cooperative banks and all client categories, unless otherwise stated

An investment firm shall publish for each class of financial instruments a summary of the analyses and conclusions it draws from its detailed monitoring of the quality of execution obtained on the execution venues where it executed all client orders in the previous year. The data must include

a) an explanation of the relative importance the investment firm gave to the execution factors of price, costs, speed, likelihood of execution or any other consideration including qualitative factors when making assessments of the quality of execution;

It has been stated in the assessment of the quality of the execution of the orders made by OP Financial Group cooperative banks' clients that the following matters have been taken into account in this order of importance: 1) the price of the financial instrument, 2) characteristics of the financial instrument, 3) size and nature of the order, 4) speed of order execution, 5) likelihood of execution and settlement and 6) costs of transaction execution and clearing and settlement. The best possible result in the execution of an order has been determined by the total consideration. The total consideration consists of the factors mentioned above.

b) a description of close links, conflicts of interest or joint ownership, if any, in view of the execution venue used to execute orders;

When executing orders, OP cooperative banks use other OP Financial Group entities that are owned by the central cooperative of the amalgamation. These joint ownerships and close links may cause conflicts of interest. In the case of conflicts of interest, OP Financial Group cooperative banks and other OP Financial Group entities comply with good practice and act in the client's best interests. A more detailed description of OP Financial Group and the amalgamation of cooperative banks can be found at [www.op.fi](http://www.op.fi).

c) a description of special arrangements made with any execution venue that apply to effected or received payments or discounts, rebates or non-monetary benefits received;

Not applicable.

d) an explanation of the factors that led to a change in the list of execution venues listed in the investment firm's execution policy, if such a change occurred;

OP Financial Group constantly evaluates the execution venues used for executing orders, and the list of execution venues has been updated if it was considered that the update improves the total consideration to the client.

e) an explanation of how order execution differs according to client categorisation, where investment firm treats such category of client differently and where it may affect order execution arrangements;

Client categorisation does not affect order execution arrangements.

f) an explanation of when 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;

When client orders are executed, primarily the client's instructions are followed, in which case special instructions issued by the client may prevent OP Financial Group cooperative banks from following their own execution policy and thereby from obtaining the best possible result for the execution of client orders. Otherwise, when executing client orders, OP Financial Group cooperative banks take account of the following matters in this order of importance, based on its Best Execution Policy: 1) the price of the financial instrument, 2) characteristics of the financial instrument, 3) size and nature of the order, 4) speed of order execution, 5) likelihood of execution and settlement and 6) costs of transaction execution and clearing and settlement.

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 the Delegated Directive (EU) 2017/575;

Within OP Financial Group, OP Financial Group cooperative banks forward the orders they have received to OP Corporate Bank plc and OP Retail Customers plc for execution. OP Corporate Bank plc analyses the quality of those orders. In the analysis of executed orders, OP Corporate Bank plc has used third-party trading analyses of execution and trading venues and the implementation method. Based on the trading analysis, the trades have been executed at the best available price.

h) an explanation of how the investment firm has used, if applicable, output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU.

Not in use.