



Chorus Capital Management Limited – RTS 28 Disclosure Document

Introduction

Chorus Capital Management Limited (“Chorus” or the “Firm”) is classified as a MiFID Investment Firm pursuant to EU Directive 2014/65/EU (“MiFID”) and is subject to ongoing reporting and disclosure obligations defined therein. MiFID2 Best Execution requirements and Regulatory Technical Standard 28 (“RTS 28”) (Delegated Regulation (EU) 2017/576), as implemented in the UK, requires MiFID Investment Firms to publish the following information on an annual basis:

- a list of the Firm’s top 5 execution venues (including brokers) in terms of trading volumes for all executed client orders per class of financial instruments;
- a list of the Firm’s top 5 execution venues (including brokers) in terms of trading volumes for all executed client orders in securities financing transactions per class of financial instruments; and
- for each class of financial instrument, a summary of the analysis and conclusions the Firm draws from monitoring of the quality of execution obtained on execution venues (including brokers) where Chorus executed all client orders in the previous year.

The publication of this information is to enable investors to make meaningful comparisons. The information is available for download in a machine-readable electronic format. The report will remain in the public domain for a minimum period of two years.

Components

This disclosure document contains information for the period 01 January 2019 - 31 December 2019 inclusive (the “Period”) on a best endeavours basis and is broken down into two sections: (i) the identity of execution venues, and (ii) the quality of execution report.

RTS Annex II, Table 2 – Trading values for executed orders

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|---|--|--|------------------------------|---------------------------------|-------------------------------|
| Class of Instrument | Structured finance 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 |
| n/a | n/a | n/a | n/a | n/a | n/a |
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|---|--|--|------------------------------|---------------------------------|-------------------------------|
| Class of Instrument | Swaps, forwards, and other 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 |
| The Bank of New York Mellon Corporation LEI: MMYX0N4ZEZ13Z4XCG897 | 100% | 100% | 0% | 0% | 100% |

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| <p>A summary of the analysis and conclusions the Firm 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</p> | <p>Structured Finance Instruments</p> <p><i>Primary Market Trades</i></p> <p>Chorus may purchase Credit Linked Note (“CLN”) securities newly issued in the primary market for which there is only one venue available for execution. Best execution is considered to be achieved for primary market trades due to the fact that there are no other available execution venues.</p> <p>Currency Derivatives (i) Swaps, forwards, and other currency derivatives</p> <p>As part of the Firm’s analysis of best execution in relation to currency derivatives, reviews were undertaken of the established RFQ process, which involves obtaining competing quotes from counterparties to assess a spread of all quoted prices to illustrate RFQ competitiveness.</p> <p>The monitoring completed confirmed that best execution was obtained consistently on the approved execution venues throughout the year.</p> |
| <p>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>Structured Finance Instruments</p> <p>Primary Market Trades</p> <p>Chorus may purchase CLN securities newly issued in the primary market for which there is only one venue available for execution. Best execution is considered to be achieved for primary market trades because there are no other available execution venues.</p> <p>Currency Derivatives (i) Swaps, forwards, and other currency derivatives</p> <p>FX transactions, which are conducted for hedging purposes, are executed directly/indirectly. Relevant factors typically considered by Chorus as part of its execution processes are costs and the availability of banks/brokers to trade and the terms offered, e.g. any collateral requirements, difference between offered FX rate and screen rate.</p> |
| <p>A description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders</p> | <p>Applies across all classes of financial instruments traded.</p> <p>The Firm does not have any close links, conflicts of interests or common ownerships with respect to the execution venues it uses to execute orders.</p> |

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| <p>A description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received</p> | <p>Applies across all classes of financial instruments traded.</p> <p>Chorus has not entered into any arrangements with its execution venues regarding payments made or received discounts or non-monetary benefits that would compromise its ability to meet its obligations in regards to best execution, conflicts of interest or inducements.</p> <p>The Firm has determined that it will pay for research from its own resources and as such has arrangements in place to remunerate certain firms for the receipt of such research. Additionally, Chorus may on occasion receive or provide minor non-monetary benefits from execution venues. They must be received/provided in accordance with the Firm's Inducements policy.</p> |
| <p>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</p> | <p>Structured Finance Instruments</p> <p>During the period under review, Chorus' list of execution venues changed. The Firm regularly reviews the effectiveness of its Best Execution Policy and its execution arrangements to identify and, where appropriate, incorporate any changes to enhance the quality of execution obtained. Following discussions with the front office and as part of the reviews carried out over the period it was determined that certain changes involving both addition and removal of certain counterparties were required to ensure that the Firm continues to obtain the best possible result for its clients. Factors considered included price, access to the market, counterparty risk and market liquidity.</p> |
| <p>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</p> | <p>Applies across all classes of financial instruments traded.</p> <p>While Chorus does take the characteristics of its clients into account when judging the relative importance of the execution factors, the Firm's clients are exclusively professional clients and so are treated with a consistent approach.</p> |
| <p>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</p> | <p>Applies across all classes of financial instruments traded.</p> <p>Not applicable. The Firm does not execute retail client orders.</p> |

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| <p>An explanation of how the Firm has used any data or tools relating to the quality of execution, including any data published under Commission Delegated Regulation (EU) 2017/575</p> | <p>Applies across all classes of financial instruments traded.</p> <p>Chorus compares and analyses relevant data to obtain best execution for its client, including execution quality data. Where the Firm transmits orders to third parties, or directly executes orders on behalf of its client with counterparties where the order relates to OTC products, the Firm takes steps to check the fairness of the price on offer by gathering market data used in the estimation of the price of such product and, where possible, by comparing with similar or comparable products.</p> |
| <p>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.</p> | <p>Applies across all classes of financial instruments traded.</p> <p>Not applicable, as there were no such CTPs available in Europe during the period to which this disclosure relates.</p> |

Use of RTS 27 Disclosure Data published by Systematic Internalisers and Trading Venues

As part of the Firm's best execution monitoring procedures the Firm has considered the data published under Commission Delegated Regulation (EU) 2017/575 by the trading venues used, those of counterparties which operate as systematic internalisers and a sample of reports published by other execution venues which the Firm does not currently utilise.