BT Pension Scheme



BT Pension Scheme Management Limited

RTS 28 – Annual report 2018

April 2019

Introduction

This report sets out the information that BT Pension Scheme Management Limited (**BTPSM**) is required to publish from a regulatory perspective in order to enable its sole client, the Trustee of the BT Pension Scheme (**Scheme**), to evaluate the quality of BTPSM's execution practices for the ultimate benefit of the members of the Scheme.

The report identifies the top five execution venues and brokers in terms of trading volumes with respect to each relevant class of financial instrument traded during 2018.

BTPSM is authorised by the Scheme to trade in the financial instruments referenced in this report. BTPSM uses these financial instruments for the efficient management of the Scheme's investment portfolio.

The information set out below applies to all of the trading activity referenced in this report.

Execution

BTPSM takes into consideration different factors when determining how to obtain the best possible outcome for the Scheme. These factors include price, costs, speed, likelihood of execution and settlement, size and market impact, nature or any other consideration relevant to the execution of an order.

Conflicts

BTPSM does not have any close links, conflicts of interest, or common ownership with respect to any of the execution venues or brokers used to execute orders.

Specific arrangements

BTPSM did not receive commissions, rebates, discounts or non-monetary benefits from any of the trading venues or brokers it used during the period.

Changes in execution venues

BTPSM did not change any of the execution venues or brokers listed in its execution policy.

Client categorisation

BTPSM's sole client, the Scheme, is categorised as a professional client.

BTPSM had no dealings with retail clients.

Data/tools used relating to execution quality

BTPSM uses internal analysis as well as an external trading cost analysis provider to monitor and assess execution quality.

Consolidated tape providers

BTPSM did not use any consolidated tape providers.

Passive orders, aggressive orders and directed orders

The Scheme did not instruct BTPSM to execute any directed orders.

BTPSM did not undertake any passive or aggressive orders.

Debt instruments

| Class of Instrument | Bonds | |
|--|--|--|
| 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 |
| Morgan Stanley & Co. International Plc LEI: 4PQUHN3JPFGFNF3BB653 | 17% | 19% |
| JP Morgan Securities plc LEI: K6Q0W1PS1L1O4IQL9C32 | 17% | 10% |
| Lloyds Bank Corporate Markets Plc LEI: 213800MBWEIJDM5CU638 | 16% | 10% |
| Barclays Bank Plc LEI: G5GSEF7VJP5I7OUK5573 | 10% | 12% |
| NatWest Markets Plc LEI: RR3QWICWWIPCS8A4S074 | 9% | 10% |

The primary trading factors that BTPSM took into account for this class of instrument were price, size and market impact.

Interest rates derivatives

| Class of Instrument | Swaps, forwards, and other interest rates derivatives | |
|--|---|--------------------------------|
| Notification if < 1 average trade | No | |
| per business day in the previous | | |
| year | | |
| Top five execution venues | Proportion of volume traded | Proportion of orders executed |
| ranked in terms of trading | as a percentage of total in | as percentage of total in that |
| volumes | that class | class |
| (descending order) | | |
| Morgan Stanley & Co. International Plc | 37% | 11% |
| LEI: 4PQUHN3JPFGFNF3BB653 | | |
| Barclays Bank Plc LEI: G5GSEF7VJP5I7OUK5573 | 31% | 16% |
| BNP Paribas LEI: R0MUWSFPU8MPRO8K5P83 | 5% | 14% |
| HSBC Bank Plc LEI: MP6I5ZYZBEU3UXPYFY54 | 5% | 15% |
| NatWest Markets Plc LEI: RR3QWICWWIPCS8A4S074 | 5% | 9% |

The primary trading factors that BTPSM took into account for this class of instrument were price, size and market impact.

Credit derivatives

| Class of Instrument | Other credit derivatives | |
|---|---------------------------|--------------------------------|
| Notification if < 1 average trade per business day in the previous year | Yes | |
| Top five execution venues ranked | Proportion of volume | Proportion of orders executed |
| in terms of trading volumes | traded as a percentage of | as percentage of total in that |
| (descending order) | total in that class | class |
| Morgan Stanley & Co. International | 40% | 40% |
| Plc | | |
| LEI: 4PQUHN3JPFGFNF3BB653 | | |
| HSBC Bank Plc | 20% | 20% |
| LEI: MP6I5ZYZBEU3UXPYFY54 | | |
| Deutsche Bank AG | 20% | 20% |
| LEI: 7LTWFZYICNSX8D621K86 | | |
| Goldman Sachs International | 20% | 20% |
| LEI: W22LROWP2IHZNBB6K528 | | |

During 2018, BTPSM executed a low number of small trades in this instrument class to develop and test our systems and operational capabilities.

Currency derivatives

| 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 |
| UBS AG LEI:BFM8T61CT2L1QCEMIK50 | 14% | 12% |
| JP Morgan Securities Plc LEI: K6Q0W1PS1L1O4IQL9C32 | 13% | 15% |
| State Street Bank and Trust Company LEI:571474TGEMMWANRLN572 | 12% | 13% |
| Goldman Sachs International LEI:W22LROWP2IHZNBB6K528 | 12% | 10% |
| Barclays Bank Plc LEI: G5GSEF7VJP5I7OUK5573 | 8% | 7% |

The primary trading factors that BTPSM took into account for this class of instrument were price, size and market impact.

Equity derivatives

| Class of Instrument | Options and Futures admitted to trading on a trading venue ¹ | |
|---------------------------------------|---|--------------------------------|
| Notification if < 1 average trade per | Yes | |
| business day in the previous year | | |
| Top five execution venues ranked | Proportion of volume | Proportion of orders executed |
| in terms of trading volumes | traded as a percentage of | as percentage of total in that |
| (descending order) | total in that class | class |
| JP Morgan Securities Plc | 54% | 63% |
| LEI: K6Q0W1PS1L1O4IQL9C32 | | |
| Merrill Lynch International | 20% | 10% |
| LEI: GGDZP1UYGU9STUHRDP48 | | |
| UBS AG | 14% | 15% |
| LEI: BFM8T61CT2L1QCEMIK50 | | |
| Deutsche Bank AG | 10% | 12% |
| LEI: 7LTWFZYICNSX8D621K86 | | |
| Goldman Sachs International | 2% | 1% |
| LEI: W22LROWP2IHZNBB6K528 | | |

The primary trading factors that BTPSM took into account for this class of instrument were price, size and market impact.

| Class of Instrument | Swaps and other equity derivatives | |
|---|--|--|
| 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 |
| Merrill Lynch International LEI: GGDZP1UYGU9STUHRDP48 | 50% | 25% |
| JP Morgan Securities plc LEI: K6Q0W1PS1L1O4IQL9C32 | 42% | 42% |
| Societe Generale LEI: O2RNE8IBXP4R0TD8PU4 | 4% | 8% |
| BNP Paribas LEI: R0MUWSFPU8MPRO8K5P83 | 3% | 17% |
| Deutsche Bank AG LEI: 7LTWFZYICNSX8D621K86 | 0% | 8% |

The swaps captured above are bespoke and not fungible between counterparties. BTPSM has transparency over the pricing and underlying components of each swap. The all-in economics, size and market impact were the primary trading factors that BTPSM took into account for this class of instrument.

¹ Disclosures made in accordance with Article 65(6) of Regulation 2017/565

Securities Financing Transactions

| Class of Instrument | Securities Financing Transactions | |
|---|---|---|
| Notification if < 1 average trade per business day in the previous year | Yes | |
| Top 5 Venues ranked in terms of volume (descending order) | Proportion of volume executed as a percentage of total in that class | Proportion of orders executed as percentage of total in that class |
| NatWest Markets Plc LEI: RR3QWICWWIPCS8A4S074 | 34% | 50% |
| JP Morgan Securities Plc LEI: K6Q0W1PS1L1O4IQL9C32 | 33% | 25% |
| Societe Generale LEI: O2RNE8IBXP4R0TD8PU4 | 32% | 25% |

The primary trading factors that BTPSM took into account for this class of instrument were price, size and market impact.