

- Applies to all product categories provided by OP cooperative banks and all client categories, unless otherwise stated
- a) (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;
 - During the assessment of the quality of the execution of orders made by OP cooperative banks' clients, it was observed that the following factors are taken into account in the execution of orders, in this order of importance: 1) the price of the financial instrument, 2) characteristics of a 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.
- a description of any close links, conflicts of interest or common ownership with respect to any execution venue used in the execution of orders;
 - OP cooperative banks are members of OP Financial Group and the amalgamation of cooperative banks. When executing orders, cooperative banks also use other OP Financial Group entities that are owned by the central cooperative of the amalgamation. These common ownerships and close links may cause conflicts of interest. In the case of conflicts of interest, 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.
- 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;
 - OP cooperative banks may receive commissions related to executed orders from such other entities of OP Financial Group that it has used as execution venues for orders. A description of these commissions can be read on the bulletin Effect of costs on investment return, available at www.op.fi.
- 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 the firm treats such category of client differently and where it may affect order execution arrangements;
 - Client categorisation does not affect order execution arrangements.
- 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 orders of an OP cooperative bank client are executed, primarily the client's instructions are followed, in which case special instructions issued by the client may prevent the bank from following its own execution policy and thereby from obtaining the best possible result for the execution of client orders. Otherwise, when executing client orders, the bank takes 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;
 - In regard to the analysis of OP cooperative banks' executed orders, third-party trading analyses of execution and trading venues and implementation method have been used. Based on this analysis, changes have been made to achieve the best possible total consideration to the client.
- 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.
 - When analysing the execution of orders made by OP cooperative banks' clients, output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU has not been used.