


MUFG Bank, Ltd.  
Singapore Branch  
Best Execution Policy



JANUARY 2022

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## **1 INTRODUCTION**

This document provides information on the best execution policy of MUFG Bank, Ltd. Singapore Branch (“MUFG Singapore”) in accordance with the requirements set out by the Monetary Authority of Singapore (“MAS”).

MAS requires capital markets intermediaries to obtain the best available terms for executing in-scope customer orders in capital markets products. The information contained in this document covers the applicability of best execution in MUFG Singapore and how MUFG Singapore will take steps to achieve best execution for eligible transactions.

For any specific queries please reach out to your relationship manager.

## **2 SCOPE**

All eligible customers who trade in-scope capital markets products such as Over-The-Counter (“OTC”) derivative contracts with MUFG Singapore.

The MAS requirements do not apply to customers classified as institutional investors (including their affiliates which are institutional investors), on the basis that these customers are sufficiently sophisticated.

## **3 APPLICABILITY**

Customers classified as accredited investors and expert investors who deal in in-scope capital markets products are subject to an assessment to determine whether or not they have a legitimate reliance on MUFG Singapore for best execution. MUFG Singapore will determine whether or not best execution applies through a holistic assessment that considers, but is not limited to, the following factors:

- the party initiating the transaction;
- market convention to shop around;
- relative price transparency of the market or customers’ ready access to price information; and
- any other relevant factors determined by MUFG Singapore.

For transactions where customers are relying on MUFG Singapore to achieve best execution, our best execution policy will apply. For transactions where customers are not relying on MUFG Singapore to achieve best execution, the requirements set out in this document will not apply. Even where best execution is deemed not to apply, MUFG Singapore is nonetheless committed to offering a fair and transparent price to our customers.

## **4 BEST EXECUTION**

### **4.1 Execution Criteria and Factors**

When it is concluded that customers rely on MUFG Singapore in accordance with Part 3, MUFG Singapore will execute the transaction based on the following factors if no specific instruction is provided:

- price (relative to the market);
- costs;

- market conditions;
- likelihood of execution and/or settlement;
- speed, likelihood of execution within a desired timeframe;
- size of the order;
- nature of the order;
- the ability of the customer to execute difficult transactions in unique and/or complex securities; and
- any other consideration relevant to the efficient execution of the order.

Ordinarily, price will merit a high relative importance in obtaining the best possible result. However, we may decide that other factors may be more important in determining the best possible execution result in accordance with our best execution policy. In determining the relative importance of the various factors, the following considerations will be taken into account:

- (a) the type / characteristics of customers (e.g. level of sophistication and knowledge in products);
- (b) the type of products;
- (c) the characteristics of the execution venues or brokers to which the order can be directed; and
- (d) the characteristics of the customer's orders.

Please note that the application of best execution policy involves the exercise of commercial judgement in the context of available information. Upon the customer engaging MUFG Singapore, we will seek to execute on the best available terms in the manner set out in this document and in accordance with our best execution policy.

## **5 SPECIFIC INSTRUCTIONS**

Where a specific instruction is provided by the customer, best execution is deemed to be achieved (if applicable) when MUFG Singapore executes according to the specific instructions. If the specific instruction relates to only part of the order and best execution applies, we will execute the remaining order in accordance with our best execution policy.

## **6 PRINCIPAL TRANSACTIONS AND EXECUTION VENUE**

Our best execution policy will apply to eligible customers in relation to in-scope capital markets products which are executed by us on a principal basis with the customer as the counterparty to the transaction. MUFG Singapore does not undertake any transaction with customers where we are acting in an agent capacity.

Specifically for OTC Derivatives, which are executed by MUFG Singapore bilaterally on a principal basis, MUFG Singapore will act as the execution venue.

## **7 MONITORING AND REVIEW**

MUFG Singapore will conduct monitoring periodically to ensure compliance with our best execution policies and procedures as well as their effectiveness.

The policies and procedures associated with our best execution framework will be reviewed periodically and whenever a material change occurs that affects our ability to achieve the best possible result for our customers.

The best execution policy may be updated from time to time in order to address changing regulatory, industry, business and other developments. The updated version of this document will be posted on:

<https://www.bk.mufg.jp/global/globalnetwork/asiaoceania/singapore.html>