

Top 5 execution venues and entities

Retail clients

2025 report - 2024 activity

According to Commission Delegated Regulation (EU) 2017/576 as transposed in national laws and regulations, ING Luxembourg S.A. has to provide for each financial instrument class a summary analysis and conclusions derived from the detailed execution quality obtained on various execution venues and entities on which ING Luxembourg S.A. customers' orders have been executed during the previous year.

Table of contents

1. Retail clients	4
A. Top 5 entities	4
1. Equities - shares & depositary receipts.....	4
2. Debt instruments: bonds & money market instruments.....	5
3. Interest rates derivatives.....	5
4. Credit derivatives	6
5. Currency derivatives	6
6. Structured finance instruments	7
7. Equity derivatives	7
8. Securitized derivatives	8
9. Commodities derivatives and emission allowances derivatives	8
10. Contracts for difference	9
11. Exchange traded products - exchange traded funds.....	9
12. Emission allowances.....	9
13. Other instruments.....	10
14. Securities Financing Transactions (SFT's)	10
B. Top 5 venues	11
1. Equities - shares & depositary receipts.....	11
2. Debt instruments: bonds & money market instruments.....	12
3. Interest rates derivatives.....	12
4. Credit derivatives.....	13
5. Currency derivatives	13
6. Structured finance instruments	14
7. Equity derivatives	14

8. Securitized derivatives 14

9. Commodities derivatives and emission allowances derivatives 15

10. Contracts for difference 15

11. Exchange traded products - exchange traded funds..... 16

12. Emission allowances..... 16

13. Other instruments..... 16

14. Securities financing transactions (SFT's)..... 16

1. Retail clients

A. Top 5 entities

1. Equities - shares & depositary receipts

Class of instrument	Equities - Shares & Depositary Receipts - Tick size liquidity bands 5 and 6 (from 2000 trades per day)				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
UBS 549300WOIFUSNYH0FL22	34,53%	35,33%	19,55%	80,45%	0,00%
BNP ARBITRAGE 6EWKU0FGVX5QQJHFGT48	31,35%	31,74%	25,90%	74,10%	0,00%
CACEIS FR 96950023SCR9X9F3L662	24,70%	24,43%	24,24%	75,76%	0,00%
CANACCORD GB / BROKE ZBU7V5NIMN4ILRFC23	9,42%	8,50%	16,02%	83,98%	0,00%

Class of instrument	Equities - Shares & Depositary Receipts - Tick size liquidity bands 3 and 4 (from 80 to 1999 trades per day)				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
UBS 549300WOIFUSNYH0FL22	36,01%	44,77%	22,01%	77,99%	0,00%
BNP ARBITRAGE 6EWKU0FGVX5QQJHFGT48	31,41%	30,14%	26,05%	73,95%	0,00%
CANACCORD GB / BROKE ZBU7V5NIMN4ILRFC23	17,54%	8,39%	27,98%	72,02%	0,00%
CACEIS FR 96950023SCR9X9F3L662	15,04%	16,71%	30,18%	69,82%	0,00%

Class of instrument	Equities - Shares & Depositary Receipts - Tick size liquidity bands 1 and 2 (from 0 to 79 trades per day)				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
BNP ARBITRAGE 6EWKU0FGVX5QQJHFGT48	36,37%	41,99%	30,00%	70,00%	0,00%
CANACCORD GB / BROKE ZBU7V5NIMN4ILRFC23	28,05%	14,17%	18,52%	81,48%	0,00%
CACEIS FR 96950023SCR9X9F3L662	17,32%	20,73%	26,58%	73,42%	0,00%
UBS 549300WOIFUSNYH0FL22	13,26%	18,11%	14,49%	85,51%	0,00%
QUINTET LUXEMBOURG KHCL65TP05J1HUW2D560	4,98%	4,72%	72,22%	27,78%	0,00%

2. Debt instruments: bonds & money market instruments

Class of instrument	Debt instruments - Bonds				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
CACEIS FR 96950023SCR9X9F3L662	100,00%	100,00%	0,00%	100,00%	0,00%

Class of instrument	Debt instruments - Money markets instruments					
Notification if <1 average trade per business day in the previous year	Y					
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders	

No activity during the period on this asset class.

3. Interest rates derivatives

Class of instrument	Interest rates derivatives - Futures and options admitted to trading on a trading venue					
Notification if <1 average trade per business day in the previous year	Y					
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders	

No activity during the period on this asset class.

Class of instrument	Interest rates derivatives - Swap, forwards and other interest rates derivatives					
Notification if <1 average trade per business day in the previous year	Y					
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders	

No activity during the period on this asset class.

4. Credit derivatives

Class of instrument	Credit derivatives - Futures and options admitted to trading on a trading venue				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

No activity during the period on this asset class.

Class of instrument	Credit derivatives - Other credit derivatives				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

No activity during the period on this asset class.

5. Currency derivatives

Class of instrument	Currency derivatives - Futures and options admitted to trading on a trading venue				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

No activity during the period on this asset class.

Class of instrument	Currency derivatives - Swap, forwards and other currency derivatives				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

No activity during the period on this asset class.

6. Structured finance instruments

Class of instrument	Structured finance instruments				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

No activity during the period on this asset class.

7. Equity derivatives

Class of instrument	Equity derivatives - Futures and options admitted to trading on a trading venue				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
CACEIS FR 96950023SCR9X9F3L662	100,00%	100,00%	11,76%	88,24%	0,00%

Class of instrument	Equity derivatives - Swap, forwards and other equity derivatives				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

No activity during the period on this asset class.

8. Securitized derivatives

Class of instrument	Securitized derivatives - Warrants and certificates derivatives				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

No activity during the period on this asset class.

Class of instrument	Securitized derivatives - Other securitized derivatives				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

No activity during the period on this asset class.

9. Commodities derivatives and emission allowances derivatives

Class of instrument	Commodities derivatives and emission allowances derivatives - Options and futures admitted to trading on a trading venue				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

No activity during the period on this asset class.

Class of instrument	Commodities derivatives and emission allowances derivatives - Other commodities derivatives and emission allowances derivatives				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

No activity during the period on this asset class.

10. Contracts for difference

Class of instrument	Contract for difference				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

No activity during the period on this asset class.

11. Exchange traded products - exchange traded funds

Class of instrument	Exchange traded products (Exchange traded funds, exchange traded notes and exchange traded commodities)				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
CANACCORD GB / BROKE ZBU7V5NIMN4ILRFC23	82,89%	76,14%	10,06%	89,94%	0,00%
CACEIS FR 96950023SCR9X9F3L662	9,58%	16,00%	31,68%	68,32%	0,00%
BNP ARBITRAGE 6EWKU0FGVX5QQJHFGT48	6,26%	5,86%	11,71%	88,29%	0,00%
UBS 549300WOIFUSNYH0FL22	1,27%	2,01%	7,89%	92,11%	0,00%

12. Emission allowances

Class of instrument	Emission allowances				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

No activity during the period on this asset class.

13. Other instruments

Class of instrument	Other instruments				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

No activity during the period on this asset class.

14. Securities Financing Transactions (SFT's)

Class of instrument	Securities Financing Transactions (SFT's)				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

No activity during the period.

B. Top 5 venues

1. Equities - shares & depositary receipts

Class of instrument	Equities - Shares & Depositary Receipts - Tick size liquidity bands 5 and 6 (from 2000 trades per day)				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

No activity during the period on this asset class.

Class of instrument	Equities - Shares & Depositary Receipts - Tick size liquidity bands 3 and 4 (from 80 to 1999 trades per day)				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

No activity during the period on this asset class.

Class of instrument	Equities - Shares & Depositary Receipts - Tick size liquidity bands 1 and 2 (from 0 to 79 trades per day)				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

No activity during the period on this asset class.

2. Debt instruments: bonds & money market instruments

Class of instrument	Debt instruments - Bonds				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
BLOOMBERG GLOBAL LTD 54930009PUGJE512LD66	100,00%	100,00%	27,97%	72,03%	0,00%

Class of instrument	Debt instruments - Money markets instruments				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
BLOOMBERG GLOBAL LTD 54930009PUGJE512LD66	100,00%	100,00%	25,00%	75,00%	0,00%

3. Interest rates derivatives

Class of instrument	Interest rates derivatives - Futures and options admitted to trading on a trading venue				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

No activity during the period on this asset class.

Class of instrument	Interest rates derivatives - Swap, forwards and other interest rates derivatives				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

No activity during the period on this asset class.

4. Credit derivatives

Class of instrument	Credit derivatives - Futures and options admitted to trading on a trading venue				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

No activity during the period on this asset class.

Class of instrument	Credit derivatives - Other credit derivatives				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

No activity during the period on this asset class.

5. Currency derivatives

Class of instrument	Currency derivatives - Futures and options admitted to trading on a trading venue				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

No activity during the period on this asset class.

Class of instrument	Currency derivatives - Swap, forwards and other currency derivatives				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

No activity during the period on this asset class.

6. Structured finance instruments

Class of instrument	Structured finance instruments				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

No activity during the period on this asset class.

7. Equity derivatives

Class of instrument	Equity derivatives - Futures and options admitted to trading on a trading venue				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

No activity during the period on this asset class.

Class of instrument	Equity derivatives - Swap, forwards and other equity derivatives				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

No activity during the period on this asset class.

8. Securitized derivatives

Class of instrument	Securitized derivatives - Warrants and certificates derivatives				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

No activity during the period on this asset class.

Class of instrument	Securitized derivatives - Other securitized derivatives				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

No activity during the period on this asset class.

9. Commodities derivatives and emission allowances derivatives

Class of instrument	Commodities derivatives and emission allowances derivatives - Options and futures admitted to trading on a trading venue				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

No activity during the period on this asset class.

Class of instrument	Commodities derivatives and emission allowances derivatives - Other commodities derivatives and emission allowances derivatives				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

No activity during the period on this asset class.

10. Contracts for difference

Class of instrument	Contract for difference				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

No activity during the period on this asset class.

11. Exchange traded products - exchange traded funds

Class of instrument	Exchange traded products (Exchange traded funds, exchange traded notes and exchange traded commodities)				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

No activity during the period on this asset class.

12. Emission allowances

Class of instrument	Emission allowances				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

No activity during the period on this asset class.

13. Other instruments

Class of instrument	Other instruments				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

No activity during the period on this asset class.

14. Securities financing transactions (SFT's)

Class of instrument	Securities Financing Transactions (SFT's)				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volumes traded as percentage of total in that class	Proportion of orders traded as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

No activity during the period.