

EXT LTD

**ANNUAL PUBLICATION OF THE TOP FIVE EXECUTION VENUES AND
INVESTMENT FIRMS AND THE QUALITY OF EXECUTION OBTAINED FOR
2019**

(Article 28(6) of the Investment Services and Activities and Regulated Markets
Law of 2017 and Article 65(6) of the Commission Delegated Regulation (EU)
2017/565 reports)



Introduction	3
Glossary	3
Top five execution venues/Top five investment firms	4
Retail clients and Professional clients	4
Classes of financial instruments	4
Quality of execution summary	5
Execution factors	5
Close links / conflicts of interest / common ownership	5
Change in the list of execution venues	6
Order execution per client categorization	6
Precedence of other criteria over price and cost	6
Data analysis	6
Usage of output of a consolidated tape provider	6



1. Introduction

Pursuant to the provisions of Article 28(6) of the Investment Services and Activities and Regulated Markets Law of 2017 (the “Law”) and Article 65(6) of the Commission Delegated Regulation (EU) 2017/565 (the “Regulation”), EXT LTD (the “Company”) is required to summarise and make public, on an annual basis, for each class of financial instruments, the top five execution venues and top 5 investment firms in terms of trading volumes where it executed or transmitted or placed client orders for execution in the preceding year and information on the quality of execution obtained.

2. Glossary

Aggressive order - Means an order entered into the order book that took liquidity.

Execution venue - Describes a regulated market, a MTF, a SI, an OTF, a market maker or different liquidity provider and/or a unit which realizes a similar task to one of the aforementioned instances.

Directed Order - Means an order where a specific execution venue was specified by the client prior to the execution of the order.

Multilateral Trading Facility ("MTF") - Describes a multilateral system operated by an investment firm or a market operator, which brings together multiple third-party buying and selling interests in financial instruments in a way that results in a contract.

Order – describes the instruction to buy or sell a financial instrument which is accepted by the Company for execution or for passing on to a third party.

Organized Trading Facility ("OTF") - Means a multilateral system which is not a regulated market or an MTF and in which multiple third-party buying and selling interests in bonds, structured finance products, emission allowances or derivatives are able to interact in the system in a way that results in a contract.

Passive order - Means an order entered into the order book that provided liquidity.

Regulated Market - A multilateral system operated and/or administered by a market operator which consolidates or promotes the consolidation of the interests of a large number of third parties in the purchasing and selling of financial instruments within the system and according to its rules which, in such a way, works properly and leads to a contract in relation to financial instruments which have been approved for trading in accordance with the rules and/or the systems of the market and which have received an approval.

Systematic Internaliser ("SI") - Means an investment firm which, on an organized, frequent systematic and substantial basis, deals on own account when executing client orders outside a regulated market, an MTF or an OTF without operating a multilateral system.



Trading Venue - A regulated market, an MTF or an OTF.

3. Top five execution venues/Top five investment firms

(RTS 28 execution venue report)/(Article 65 (6) investment firm report)

The report data is available in a machine-readable electronic format, available for downloading by the public.

4. Classes of financial instruments

The Company does not trade in all financial instruments as specified in ANNEX I of the COMMISSION DELEGATED REGULATION (EU) 2017/576. Below is the summary of financial instruments classes included in the report.

Instrument Class/Sub Class	Description
Equities – Tick size liquidity bands 5 and 6	EU Cash Shares covered by the MiFID II tick size regime
Equities – Tick size liquidity bands 3 and 4	EU Cash Shares covered by the MiFID II tick size regime
Equities – Tick size liquidity band 1 and 2	EU Cash Shares covered by the MiFID II tick size regime
Debt instruments - Bonds	Debt securities (bonds, money market instruments)
Debt instruments - Money markets instruments	Money markets instruments
Interest rates derivatives - Futures and options admitted to trading on a trading venue	Futures and options contracts falling into category “Financials - Interest rates” and “Financials - Debt instruments”
Currency derivatives - Futures and options admitted to trading on a trading venue	Futures and options contracts falling into category “Financials - Currencies”
Currency derivatives - Swaps, forwards, and other currency derivatives	Rolling spot FX (FX forwards)
Equity Derivatives - Options and Futures admitted to trading on a trading venue	Futures and options contracts falling into category “Financials - Stock-Equities” and “Financials - Indices”
Commodities derivatives and emission allowances Derivatives - Options and Futures admitted to trading on a trading venue	Commodity Futures and options contracts
Contracts for difference	CFD



Exchange traded products (Exchange traded funds, exchange traded notes and exchange traded commodities)	ETP
Other instruments	EU Cash Shares not covered by the MiFID II tick size regime, North America, Russia and Asia/Pacific Cash Shares, Mutual Funds.

5. Quality of execution summary

The summary below is applicable to all groups of financial instruments offered by the Company.

5.1. Execution factors

When executing clients' orders the Company takes into consideration the following execution factors:

- a) Price;
- b) Cost;
- c) Speed of execution;
- d) Likelihood of execution;
- e) Likelihood of settlement;
- f) Size of Order;
- g) Nature of Order; and
- h) Market Impact.

The Company acts as in accordance with its Order Execution Policy and executes Orders by taking into consideration all of the above factors giving, however, primary consideration to the price, cost and speed of execution.

5.2. Close links / conflicts of interest / common ownership

The Company does not have any close links, conflicts of interests with any execution venues used to execute orders.

There are no specific arrangements with any execution venue regarding payments made or received, discounts, remuneration, rebates, non-monetary benefits or other incentives that may influence the Company to use one execution venue over another.

5.3. Change in the list of execution venues

With the implementation of MiFID II, an overall review of the list of venues was completed in line with the review of the Order Execution Policy, with the list of venues to be reviewed on an ongoing basis.



Order Execution Policy has continued to see changes in 2019 and was updated to reflect changes to the list of brokers and venues used for orders transmission and execution.

5.4. Order execution per client categorization

In 2019 the Company executed orders for retail and professional clients. Order execution principles are the same for the retail and professional clients and may vary for eligible counterparties subject to the specific market conditions or client instructions.

5.5. Precedence of other criteria over price and cost

Other criteria over price and cost may have been used if a Client provided specific criteria to the Order.

5.6. Data analysis

The Company has not used regulatory quality of execution reports (RTS 27) for assessment of execution venues. When assessing the quality of execution the Company utilizes the following available tools and data in order to ensure the best possible result for the Client:

- Real time monitoring of markets, price, time to market;
- Broker & service quality controls;
- Client feedback.

5.7. Usage of output of a consolidated tape provider

The Company has not used output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU ("MiFID II)