

## Best Execution - Top 5 Execution Venues 2019 Report

\* Following implementation of the Markets in Financial Instruments Directive (MiFID II), investment firms are required to summarise and make public on an annual basis, for each class of financial instruments, the top five execution venues in terms of trading volumes and number of trades where they executed client orders in the preceding year and information on the quality of execution obtained.

\* There are 13 Asset Classes of Financial Instruments, presented in 22 sub-Asset Classes. It should be noted that SOVA Capital Limited does not trade in all of these 22 sub-Asset Classes.

\* The report covers the period from 1 of January 2019 to 31 December 2019 and should be read in conjunction with the Order execution Policy of SOVA Capital Limited, published on web-site <https://sovacapital.com/>.

\* This report contains information about orders executed on behalf of clients classified as Professional Clients orders, because SOVA deals with Eligible Counterparties and Professional clients only

\* SOVA Capital Limited divided orders which were executed directly as "Execute" and the order which were transmitted to other financial firm for execution "Receipt and Transmission of Orders"

\* Equities and other instruments/Asset Classes which do not trade in the EEA are not allocated with a liquidity band and report under "Other instruments" Class

\* Qualitative Summary is at the end of the report

Class of Instrument:		Equities: Tick size liquidity band 5 & 6				
Notification if <1 average trade per business day in the previous year		No				
Order Transmission Type:		Receipt and Transmission of Orders				
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 traded as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders	
Instinet Europe Limited (213800MXAKR2LA1VBM44)	46,48%	55,0%	73%	27%	100%	
Barclays Capital Securities Limited (K9WDOH4D2PYBLSLOB484)	33,43%	37,4%	n/a	n/a	n/a	
Virtu Financial Ireland Limited (549300XG5LFGN1IGYC71)	20,03%	7,7%	n/a	n/a	n/a	
HSBC Bank PLC (MP615ZYBZEU3UXPFY54)	0,06%	0,0%	n/a	n/a	n/a	

Class of Instrument:		Equities: Tick size liquidity band 3 & 4				
Notification if <1 average trade per business day in the previous year		No				
Order Transmission Type:		Receipt and Transmission of Orders				
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 traded as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders	
Virtu Financial Ireland Limited (549300XG5LFGN1IGYC71)	77,34%	55,1%	n/a	n/a	n/a	
Barclays Capital Securities Limited (K9WDOH4D2PYBLSLOB484)	9,40%	12,6%	n/a	n/a	n/a	
Instinet Europe Limited (213800MXAKR2LA1VBM44)	8,68%	29,5%	66%	34%	100%	
HSBC Bank PLC (MP615ZYBZEU3UXPFY54)	4,54%	2,0%	n/a	n/a	n/a	
Jefferies International Limited (S5THZMDUJCTQZBTRV198)	0,04%	0,8%	n/a	n/a	n/a	

Class of Instrument:		Equities: Tick size liquidity band 1 & 2				
Notification if <1 average trade per business day in the previous year		No				
Order Transmission Type:		Receipt and Transmission of Orders				
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 traded as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders	
Virtu Financial Ireland Limited (549300XG5LFGN1IGYC71)	83,35%	81,1%	n/a	n/a	n/a	
HSBC Bank PLC (MP615ZYBZEU3UXPFY54)	14,39%	7,1%	n/a	n/a	n/a	
Instinet Europe Limited (213800MXAKR2LA1VBM44)	1,84%	8,7%	65%	35%	100%	
Barclays Capital Securities Limited (K9WDOH4D2PYBLSLOB484)	0,33%	2,8%	n/a	n/a	n/a	
Jefferies International Limited (S5THZMDUJCTQZBTRV198)	0,09%	0,3%	n/a	n/a	n/a	

Class of Instrument:		Debt instruments: Bonds				
Notification if <1 average trade per business day in the previous year		No				
Order Transmission Type:		Receipt and Transmission of Orders and Execute				
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 traded as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders	
SOVA Capital limited (213800T9OJMZA69QDM04)	99,77%	95,4%	n/a	n/a	n/a	
REGION Investment Company JSC (253400HRVCG54TYQLT64)	0,23%	4,6%	n/a	n/a	100%	

Class of Instrument:		Debt instruments: Money market instruments				
Notification if <1 average trade per business day in the previous year		No				
Order Transmission Type:		Execute				
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 traded as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders	
SOVA Capital limited (213800T9OJMZA69QDM04)	100,00%	100,0%	n/a	n/a	n/a	

Class of Instrument:		Interest rate derivatives: Futures & Options				
Notification if <1 average trade per business day in the previous year		No				
Order Transmission Type:		n/a				
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 traded as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders	
Not traded	n/a	n/a	n/a	n/a	n/a	

<b>Class of Instrument:</b>	<b>Interest rate derivatives: Swaps, forwards and other instrument rate derivatives</b>				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	<b>No</b>				
<b>Order Transmission Type:</b>	<b>n/a</b>				
<b>Top five execution venues ranked in terms of trading volumes (descending order)</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders traded as a percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
Not traded	n/a	n/a	n/a	n/a	n/a

<b>Class of Instrument:</b>	<b>Credit derivatives: Futures &amp; Options</b>				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	<b>No</b>				
<b>Order Transmission Type:</b>	<b>n/a</b>				
<b>Top five execution venues ranked in terms of trading volumes (descending order)</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders traded as a percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
Not traded	n/a	n/a	n/a	n/a	n/a

<b>Class of Instrument:</b>	<b>Credit derivatives: Other credit derivatives</b>				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	<b>No</b>				
<b>Order Transmission Type:</b>	<b>n/a</b>				
<b>Top five execution venues ranked in terms of trading volumes (descending order)</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders traded as a percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
Not traded	n/a	n/a	n/a	n/a	n/a

<b>Class of Instrument:</b>	<b>Currency derivatives: Futures &amp; Options</b>				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	<b>No</b>				
<b>Order Transmission Type:</b>	<b>Execute</b>				
<b>Top five execution venues ranked in terms of trading volumes (descending order)</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders traded as a percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
SOVA Capital limited (213800T9OJMZA69QDM04)	100,00%	100,0%	n/a	n/a	n/a

<b>Class of Instrument:</b>	<b>Currency derivatives: Swaps, forwards and other instrument rate derivatives</b>				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	<b>No</b>				
<b>Order Transmission Type:</b>	<b>Execute</b>				
<b>Top five execution venues ranked in terms of trading volumes (descending order)</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders traded as a percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
SOVA Capital limited (213800T9OJMZA69QDM04)	100,00%	100,0%	n/a	n/a	n/a

<b>Class of Instrument:</b>	<b>Structured finance instruments:</b>				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	<b>Yes</b>				
<b>Order Transmission Type:</b>	<b>Execute</b>				
<b>Top five execution venues ranked in terms of trading volumes (descending order)</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders traded as a percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
SOVA Capital limited (213800T9OJMZA69QDM04)	100,00%	100,0%	n/a	n/a	n/a

<b>Class of Instrument:</b>	<b>Equity derivatives: Futures &amp; Options</b>				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	No				
<b>Order Transmission Type:</b>	Execute				
<b>Top five execution venues ranked in terms of trading volumes (descending order)</b>	Proportion of volume traded as a percentage of total in that class	Proportion of orders traded as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
SOVA Capital limited (213800T90JMZA69QDM04)	100,00%	100,0%	n/a	n/a	n/a

<b>Class of Instrument:</b>	<b>Equity derivatives: Swaps and other equity derivatives</b>				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	No				
<b>Order Transmission Type:</b>	Execute				
<b>Top five execution venues ranked in terms of trading volumes (descending order)</b>	Proportion of volume traded as a percentage of total in that class	Proportion of orders traded as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
SOVA Capital limited (213800T90JMZA69QDM04)	100,00%	100,0%	n/a	n/a	n/a

<b>Class of Instrument:</b>	<b>Securitized derivatives: Warrants &amp; certificate derivatives</b>				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	No				
<b>Order Transmission Type:</b>	n/a				
<b>Top five execution venues ranked in terms of trading volumes (descending order)</b>	Proportion of volume traded as a percentage of total in that class	Proportion of orders traded as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Not traded	n/a	n/a	n/a	n/a	n/a

<b>Class of Instrument:</b>	<b>Securitized derivatives: Other securitized derivatives</b>				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	No				
<b>Order Transmission Type:</b>	n/a				
<b>Top five execution venues ranked in terms of trading volumes (descending order)</b>	Proportion of volume traded as a percentage of total in that class	Proportion of orders traded as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Not traded	n/a	n/a	n/a	n/a	n/a

<b>Class of Instrument:</b>	<b>Commodity derivatives: Futures &amp; Options</b>				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	No				
<b>Order Transmission Type:</b>	Execute				
<b>Top five execution venues ranked in terms of trading volumes (descending order)</b>	Proportion of volume traded as a percentage of total in that class	Proportion of orders traded as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
SOVA Capital limited (213800T90JMZA69QDM04)	100,00%	100,0%	n/a	n/a	n/a

<b>Class of Instrument:</b>	<b>Commodity derivatives: Other commodity derivatives</b>				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	No				
<b>Order Transmission Type:</b>	Execute				
<b>Top five execution venues ranked in terms of trading volumes (descending order)</b>	Proportion of volume traded as a percentage of total in that class	Proportion of orders traded as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
SOVA Capital limited (213800T90JMZA69QDM04)	100,00%	100,0%	n/a	n/a	n/a

<b>Class of Instrument:</b>	<b>Contracts for difference</b>				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	No				
<b>Order Transmission Type:</b>	n/a				
<b>Top five execution venues ranked in terms of trading volumes (descending order)</b>	Proportion of volume traded as a percentage of total in that class	Proportion of orders traded as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Not traded	n/a	n/a	n/a	n/a	n/a

<b>Class of Instrument:</b>	<b>Exchange traded products</b>				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	No				
<b>Order Transmission Type:</b>	Receipt and Transmission of Orders and Execute				
<b>Top five execution venues ranked in terms of trading volumes (descending order)</b>	Proportion of volume traded as a percentage of total in that class	Proportion of orders traded as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Virtu Financial Ireland Limited (549300XG5LFGN1IGYC71)	87,61%	85,7%	n/a	n/a	n/a
HSBC Bank PLC (MP6I5ZYBUEU3UXPFYF54)	10,32%	9,6%	n/a	n/a	n/a
Instinet Europe Limited (213800MXAKR2LA1VBM44)	1,25%	3,1%	n/a	n/a	100%
Barclays Capital Securities Limited (K9WDOH4D2PYBSLOB484)	0,82%	1,6%	n/a	n/a	n/a

<b>Class of Instrument:</b>	<b>Emissions allowances</b>				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	No				
<b>Order Transmission Type:</b>	n/a				
<b>Top five execution venues ranked in terms of trading volumes (descending order)</b>	Proportion of volume traded as a percentage of total in that class	Proportion of orders traded as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Not traded	n/a	n/a	n/a	n/a	n/a

<b>Class of Instrument:</b>	<b>Other instruments</b>				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	No				
<b>Order Transmission Type:</b>	Execute				
<b>Top five execution venues ranked in terms of trading volumes (descending order)</b>	Proportion of volume traded as a percentage of total in that class	Proportion of orders traded as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
REGION Investment Company JSC (253400HRVCG54TYQLT64)	100,00%	100,0%	n/a	n/a	100%

Qualitative Data for the Purpose of RTS 28/Art 65(6) Reports

EXECUTION FACTORS:	<p>When executing orders on behalf of clients in relation to Financial Instruments, SOVA will take all sufficient steps to achieve best execution. SOVA has in place processes, which are designed to obtain the best possible execution result on a consistent basis, subject to, and taking into account the Financial Instrument subject to the order, the nature of the order, the execution venues available to SOVA for such Financial Instruments and the priorities the client places upon SOVA executing those orders.</p> <p>SOVA will generally give price a higher relative importance when obtaining the best possible result for orders executed on behalf of the client. However, it may also take into consideration a range of different factors, including the need for timely execution, the availability of price improvement, the liquidity of the market (which may make it difficult to execute an order), potential price impact on the market, the size of the order, the nature of the financial transaction (including whether or not such transactions are executable on a regulated market, over-the counter, or both) and the quality and cost effectiveness of any related clearing and settlement facilities. SOVA will determine the importance of the execution factors by using its commercial judgement and experience in light of the market information available to it in support of the best possible outcome for its clients. The relative importance of the execution factors must be determined by referring to the execution criteria, which include the characteristics of the client, the client order, the brokers/ execution venues and finally Factors to consider are</p> <ul style="list-style-type: none"> <li>• Price</li> <li>• Likelihood of Execution</li> <li>• Speed</li> <li>• Costs</li> <li>• Counterparty/Credit Risk</li> <li>• Market conditions</li> <li>• Settlement</li> </ul> <p>The relative importance of each of these factors will vary depending upon a number of criteria, namely:-</p> <ol style="list-style-type: none"> <li>1. the client's instructions;</li> <li>2. the characteristics of financial instruments that are the subject of that order; and</li> <li>3. the characteristics of the execution venues to which that order can be directed</li> </ol> <p>Each client order that is transacted by our traders is inherently unique in its characteristics and market conditions are never constant. The relative importance of the execution factors is therefore variable. That said, the particular combination of total consideration (price of the instrument and costs of execution, both implicit and explicit) and size are usually the most considered factors when <u>setting our execution strategy. Where an instrument is less liquid, then likelihood of execution</u></p>
EQUITIES	The dominant execution factors are likely to be price and speed of execution; however, liquidity will also be a factor
FIXED INCOME	The traders consider a range of factors in deciding where and how to execute an order to obtain the best possible result for the client. Consistent liquidity and price are normally the most important factors in this decision. Other factors which will be considered include speed, size, likelihood of execution and settlement
EXCHANGE TRADED DERIVATIVES	The dominant execution factors are likely to be price and speed of execution, when executing electronically, although other factors may be considered including price, costs, size, likelihood of execution and settlement
OTC DERIVATIVES	For OTC derivatives the predominant execution factor is likely to be liquidity. SOVA will treat clients fairly where they wish to close their positions before the expiration date, applying equivalent pricing benchmarks to when positions are opened
STRUCTURED PRODUCTS	Issuers are selected on their pricing, credit rating of Issuer and/or instrument, liquidity capability, speed of execution and choice of underlying
REPO / STOCK LENDING & BORROWING	Generally, price will be one of the most important execution factors but due to the bespoke and very structured nature of the instrument, many bespoke factors to each trade will affect the price, including: characteristics of collateral, exposure to counterparty, margin and haircuts applied
FOREIGN EXCHANGE	The dominant execution factors are likely to be price and speed of execution, when executing electronically, although other factors may be considered including price, costs, size, likelihood of execution and settlement. As a non-MiFID instrument FX spot transaction are out of scope for best execution obligation
AFFILIATIONS AND CONFLICTS OF INTEREST	Sova Capital Limited is not affiliated with any execution venue/broker used to execute client orders
SPECIFIC FINANCIAL ARRANGEMENTS WITH EXECUTION VENUES	SOVA does not receive payments, discounts, rebates or non-monetary benefits in its trading arrangements. SOVA will also take steps to structure or charge its commissions in such a way as to not discriminate unfairly between execution venues
CHANGES IN VENUE USAGE	When selecting venues for direct execution SOVA will consider the following qualitative factors: price, cost (including mark ups, mark downs, and spreads) liquidity, credit and settlement risk, market share and speed of access.  Brokerage Firms remain on our list of execution venues subject to an authorisation and ongoing monitoring process. Where the broker Region is specified, orders are executed through it, since the Region is a member on the exchange (MOEX) Where the broker Sova is specified these are bilateral trades where Sova act as Principal/Counterparty to the client
EXECUTION FACTORS SPECIFIC TO CUSTOMER TYPES	SOVA deals with Eligible Counterparties and Professional clients only. The firm does not differentiate between clients and therefore client categorisation does not impact order execution arrangements.
SITUATIONS WHERE PRICE AND COST WERE NOT THE PRIMARY EXECUTION FACTORS	SOVA does not trade retail client orders
IF AND HOW THE FIRM UTILISED DATA FROM RTS 27 REPORTS	SOVA did not utilise data from RTS 27 reports. The firm may assess the quality of execution using a number of sources
IF AND HOW THE FIRM UTILIZED A CTP (consolidated tape provider) WHEN MAKING EXECUTION DECISIONS	This is not applicable, as there are currently no consolidated tape providers in Europe.