

## Top 5 Execution Venues 2020 Report

This report has been prepared by Sova Capital Limited for the period beginning 1 January 2020 and ending 31 December 2020 (the "Reporting Period") for the purposes of meeting Sova Capital Limited's regulatory obligations under Commission Delegated Regulation (EU) 2017/576 ("MiFID II") which requires Sova Capital Limited to annually publish (i) the top five venues where it executed clients orders; and (ii) the top five firms to whom it transmitted or placed client orders for execution, in respect of each class of financial instruments noted below.

Sova Capital Limited does not guarantee the correctness or completeness of the information in this report and shall not be responsible for or have any liability whatsoever for any loss or damage caused by errors, inaccuracies, or omissions in connection with use or reliance on this information. Sova Capital Limited reserves the right to update and republish the RTS 28 Reports at any time following internal reviews.

Sova Capital Limited does not trade all 21 classes of Financial instruments.  
Sova Capital Limited does not have any Retail clients.

RTS 28 requires the reporting of whether executions were passive or aggressive. Given that Sova Capital Limited do not always trade directly on the order books of exchanges, this is not always applicable. In some instances where it may be applicable for example, when we direct an order to a DEA Provider, we are reliant on the DEA Provider to provide us with this level of granular information.

Percentages of passive/aggressive orders were calculated based on the data of trading on LSE provided by Instinet Europe Limited.  
Virtu Financial Ireland Limited has been decommissioned since June 2020.

Where equity tick size liquidity bandings are available, we have classified the trade and calculation under the relevant tick size liquidity banding. Where this information is not available, we have included this in "Other" instrument table.

<b>Class of Instrument:</b>	<b>Equities: Tick size liquidity band 5 &amp; 6</b>
<b>Notification if &lt;1 average trade per business day in the previous year</b>	<b>No</b>

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
Barclays Capital Securities Limited (K9WDOH4D2PYBSLSOB484)	36.79%	11.73%	n/a	n/a	n/a
Instinet Europe Limited (213800MXAKR2LA1VBM44)	29.59%	50.75%	39.92%	59.12%	n/a
SOVA Capital limited (213800T9OJMZA69QDM04)	21.08%	0.48%	n/a	n/a	n/a
Virtu Financial Ireland Limited (549300XG5LFGN1IGYC71)	5.96%	1.71%	n/a	n/a	n/a
MKB Investments Limited (253400D9ZMLFR8FLTB43)	4.14%	34.70%	n/a	n/a	n/a

<b>Class of Instrument:</b>	<b>Equities: Tick size liquidity band 3 &amp; 4</b>
<b>Notification if &lt;1 average trade per business day in the previous year</b>	<b>No</b>

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
Barclays Capital Securities Limited (K9WDOH4D2PYBSLSOB484)	37.78%	10.50%	n/a	n/a	n/a
Instinet Europe Limited (213800MXAKR2LA1VBM44)	24.08%	12.26%	48.10%	49.70%	n/a
MKB Investments Limited (253400D9ZMLFR8FLTB43)	20.88%	75.71%	n/a	n/a	n/a
SOVA Capital limited (213800T9OJMZA69QDM04)	10.25%	0.12%	n/a	n/a	n/a
Virtu Financial Ireland Limited (549300XG5LFGN1IGYC71)	4.74%	0.78%	n/a	n/a	n/a

<b>Class of Instrument:</b>	<b>Equities: Tick size liquidity band 1 &amp; 2</b>
<b>Notification if &lt;1 average trade per business day in the previous year</b>	<b>No</b>

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
Barclays Capital Securities Limited (K9WDOH4D2PYBSLSOB484)	53.23%	17.42%	n/a	n/a	n/a
HSBC Bank PLC (MP615ZYZBEU3UXPYFY54)	12.22%	2.12%	n/a	n/a	n/a
Instinet Europe Limited (213800MXAKR2LA1VBM44)	11.78%	9.40%	56.66%	30.10%	n/a
SOVA Capital limited (213800T9OJMZA69QDM04)	11.44%	0.18%	n/a	n/a	n/a
MKB Investments Limited (253400D9ZMLFR8FLTB43)	7.51%	69.40%	n/a	n/a	n/a

<b>Class of Instrument:</b>	<b>Debt instruments: Bonds</b>
<b>Notification if &lt;1 average trade per business day in the previous year</b>	<b>No</b>

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)	99.87%	66.93%	n/a	n/a	n/a
MKB Investments Limited (253400D9ZMLFR8FLTB43)	0.13%	33.07%	n/a	n/a	n/a

<b>Class of Instrument:</b>	<b>Debt instruments: Money market instruments</b>
<b>Notification if &lt;1 average trade per business day in the previous year</b>	<b>No</b>

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%	100.00%	n/a	n/a	n/a

<b>Class of Instrument:</b>	<b>Interest rate derivatives: Futures &amp; Options</b>
Notification if <1 average trade per business day in the previous year	No

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
n/a	n/a	n/a	n/a	n/a	n/a
Not traded					

<b>Class of Instrument:</b>	<b>Interest rate derivatives: Swaps, forwards and other instrument rate derivatives</b>
Notification if <1 average trade per business day in the previous year	No

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
n/a	n/a	n/a	n/a	n/a	n/a
Not traded					

<b>Class of Instrument:</b>	<b>Credit derivatives: Futures &amp; Options</b>
Notification if <1 average trade per business day in the previous year	No

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
n/a	n/a	n/a	n/a	n/a	n/a
Not traded					

<b>Class of Instrument:</b>	<b>Credit derivatives: Other credit derivatives</b>
Notification if <1 average trade per business day in the previous year	No

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 (213800T90JMZA69QDM04)	100.00%	100.00%	n/a	n/a	n/a

<b>Class of Instrument:</b>	<b>Currency derivatives: Futures &amp; Options</b>
Notification if <1 average trade per business day in the previous year	No

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
MKB Investments Limited (253400D9ZMLFR8FLTB43)	99.997%	99.9999%	n/a	n/a	n/a
SOVA Capital limited (213800T90JMZA69QDM04)	0.003%	0.0001%	n/a	n/a	n/a

<b>Class of Instrument:</b>	<b>Currency derivatives: Swaps, forwards and other instrument rate derivatives</b>
Notification if <1 average trade per business day in the previous year	No

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 (213800T90JMZA69QDM04)	66.18%	15.79%	n/a	n/a	n/a
MKB Investments Limited (253400D9ZMLFR8FLTB43)	33.82%	84.21%	n/a	n/a	n/a

<b>Class of Instrument:</b>	<b>Structured finance instruments:</b>
Notification if <1 average trade per business day in the previous year	Yes

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 (213800T90JMZA69QDM04)	100.00%	100.00%	n/a	n/a	n/a

<b>Class of Instrument:</b>	<b>Equity derivatives: Futures &amp; Options</b>
Notification if <1 average trade per business day in the previous year	No

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
MKB Investments Limited (253400D9ZMLFR8FLTB43)	98.16%	99.998%	n/a	n/a	n/a
SOVA Capital limited (213800T90JMZA69QDM04)	1.84%	0.002%	n/a	n/a	n/a

<b>Class of Instrument:</b>	<b>Equity derivatives: Swaps and other equity derivatives</b>
Notification if <1 average trade per business day in the previous year	No

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 (213800T90JMZA69QDM04)	100.00%	100.00%	n/a	n/a	n/a

<b>Class of Instrument:</b>	<b>Securitized derivatives: Warrants &amp; certificate derivatives</b>
Notification if <1 average trade per business day in the previous year	No

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
n/a	n/a	n/a	n/a	n/a	n/a
Not traded					

<b>Class of Instrument:</b>	<b>Securitized derivatives: Other securitized derivatives</b>
Notification if <1 average trade per business day in the previous year	No

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
n/a	n/a	n/a	n/a	n/a	n/a
Not traded					

<b>Class of Instrument:</b>	<b>Commodity derivatives: Futures &amp; Options</b>
Notification if <1 average trade per business day in the previous year	No

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
MKB Investments Limited (253400D9ZMLFR8FLTB43)	99.99%	99.9999%	n/a	n/a	n/a
SOVA Capital limited (213800T90JMZA69QDM04)	0.01%	0.0001%	n/a	n/a	n/a

<b>Class of Instrument:</b>	<b>Commodity derivatives: Other commodity derivatives</b>
Notification if <1 average trade per business day in the previous year	No

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 (213800T90JMZA69QDM04)	100.00%	100.00%	n/a	n/a	n/a

<b>Class of Instrument:</b>	<b>Contracts for difference</b>
Notification if <1 average trade per business day in the previous year	No

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
n/a	n/a	n/a	n/a	n/a	n/a
Not traded					

<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>	<b>No</b>

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
Barclays Capital Securities Limited (K9WDOH4D2PYBSLSOB484)	41.44%	2.68%	n/a	n/a	n/a
MKB Investments Limited (253400D9ZMLFR8FLTB43)	25.03%	94.14%	n/a	n/a	n/a
Virtu Financial Ireland Limited (549300XG5LFGN11GYC71)	15.60%	0.88%	n/a	n/a	n/a
Instinet Europe Limited (213800MXAKR2LA1VBM44)	14.70%	2.00%	42.17%	57.83%	n/a
HSBC Bank PLC (MP6I5ZYZBEU3UXPYFY54)	3.23%	0.30%	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>	<b>No</b>

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
n/a	n/a	n/a	n/a	n/a	n/a
Not traded					

<b>Class of Instrument:</b>	<b>Other instruments</b>
<b>Notification if &lt;1 average trade per business day in the previous year</b>	<b>No</b>

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
MKB Investments Limited (253400D9ZMLFR8FLTB43)	86.19%	99.80%	n/a	n/a	n/a
SOVA Capital limited (213800T9OJMZA69QDM04)	13.20%	0.05%	n/a	n/a	n/a
Barclays Capital Securities Limited (K9WDOH4D2PYBSLSOB484)	0.31%	0.06%	n/a	n/a	n/a
Instinet Europe Limited (213800MXAKR2LA1VBM44)	0.24%	0.07%	26.48%	70.55%	n/a
Virtu Financial Ireland Limited (549300XG5LFGN11GYC71)	0.04%	0.01%	n/a	n/a	n/a



## SOVA CAPITAL RTS 28 QUALITATIVE SUMMARY

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

Requirement	Text
Article 3(3): Investment Firms shall publish <i>for each class of financial instruments</i> , a summary of the analysis and conclusions they draw from their detailed monitoring of the quality of execution obtained on the execution venues where they executed all client orders in the previous year. The information shall include:	
<p><b><u>EXECUTION FACTORS</u></b></p> <p>(a) an explanation of the relative importance the Firm gave to the execution factors of price, costs, speed, likelihood of execution or any other consideration including qualitative factors when assessing the quality of execution;</p>	<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 the instrument class.</p> <p>Factors to consider are</p> <ul style="list-style-type: none"> <li>· <i>Price</i></li> <li>· <i>Likelihood of Execution</i></li> <li>· <i>Speed</i></li> <li>· <i>Costs</i></li> <li>· <i>Counterparty/ Credit Risk</i></li> <li>· <i>Market conditions</i></li> <li>· <i>Settlement</i></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 setting our execution strategy. Where an instrument is less liquid, then likelihood of execution becomes a more important consideration.</p> <p><b><u>EQUITIES</u></b></p> <p>The dominant execution factors are likely to be price and speed of execution; however, liquidity will also be a factor.</p> <p><b><u>FIXED INCOME</u></b></p> <p>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.</p> <p><b><u>EXCHANGE TRADED DERIVATIVES</u></b></p> <p>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.</p> <p><b><u>OTC DERIVATIVES</u></b></p> <p>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.</p> <p><b><u>STRUCTURED PRODUCTS</u></b></p> <p>Issuers are selected on their pricing, credit rating of Issuer and/or instrument, liquidity capability, speed of execution and choice of underlying.</p> <p><b><u>REPO / STOCK LENDING &amp; BORROWING</u></b></p> <p>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.</p> <p><b><u>FOREIGN EXCHANGE</u></b></p> <p>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.</p> <p>As a non-MiFID instrument FX spot transaction are out of scope for best execution obligation.</p> <p><b><u>Summary</u></b></p> <p>Sova takes sufficient steps to obtain, when executing orders, the best possible results for its professional clients taking into account the execution factors of price, costs, speed, likelihood of execution and settlement, size, nature or any other consideration relevant to the execution of an order. Sales traders monitor best execution on a real-time basis. Sales also do monthly analysis of prices as part of 1 Line of Defence best execution monitoring. Compliance as 2 Line of Defence conducts independent transactions and orders monitoring.</p>

<p><b><u>AFFILIATIONS AND CONFLICTS OF INTEREST</u></b>  (b) a description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders;</p>	<p>SOVA passes orders to its affiliate to execute where it is an exchange member. For example, MOEX.</p> <p>The affiliate is identified as REGION Investment Company JSC (253400HRVCG54TYQLT64) in the quantitative report.</p> <p>REGION Investments as of 7 October 2020 changed its name to MKB Investments due to change of its ownership. MKB Investment is now 100% owned by Credit Bank of Moscow (MKB).</p>
<p><b><u>SPECIFIC FINANCIAL ARRANGEMENTS WITH EXECUTION VENUES</u></b>  (c) a description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received;</p>	<p>SOVA does not receive payments, discounts, rebates or non-monetary benefits in its trading arrangements.</p> <p>SOVA will also take steps to structure or charge its commissions in such a way as to not discriminate unfairly between execution venues</p>
<p><b><u>CHANGES IN VENUE USAGE</u></b>  (d) an explanation of the factors that led to a change in the list of execution venues listed in the Firm's execution policy, if such a change occurred;</p>	<p>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.</p> <p>Brokerage Firms remain on our list of execution venues subject to an authorisation and ongoing monitoring process.</p>
<p><b><u>EXECUTION FACTORS SPECIFIC TO CUSTOMER TYPES</u></b>  (e) an explanation of how order execution differs according to client categorisation, where the Firm treats categories of clients differently and where it may affect the order execution arrangements;</p>	<p>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.</p>
<p><b><u>SITUATIONS WHERE PRICE AND COST WERE NOT THE PRIMARY EXECUTION FACTORS</u></b>  (f) an explanation of whether 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;</p>	<p>SOVA does not trade retail client orders.</p>
<p><b><u>IF AND HOW THE FIRM UTILISED DATA FROM RTS 27 REPORTS</u></b>  (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 Delegated Regulation (EU) 2017/575 [RTS 27];</p>	<p>SOVA did not utilise data from RTS 27 reports.</p>
<p><b><u>IF AND HOW THE FIRM UTILIZED A CTP WHEN MAKING EXECUTION DECISIONS</u></b>  (h) where applicable, an explanation of how the investment Firm has used output of a consolidated tape provider</p>	<p>This is not applicable, as there are currently no consolidated tape providers in Europe.</p>