

Annual Top 5 execution venue report
(for the period 01.01.2018-31.12.2018)

Directive 2014/65/EU of 15 May 2014 on markets in financial instruments and its delegated legislation (MiFID II) require Rigensis Bank AS (the Bank) to publish a summary of the analysis and conclusions from monitoring of the quality of execution venues where the Bank executed its customers' (clients) orders in year 2018.

According to provisions of MiFID II the Bank has to make separation based on whether it executes client's order – executes directly or receives and transmits the orders for execution to another partner (broker). The Bank provides both services, i.e. execution of orders and orders' reception and transmission to a broker. Transactions in currency derivatives - *SWAPs and forwards* are executed directly by the bank and all other clients' orders (*i.e. shares and depositary receipts, exchange traded products (shares of funds, ETF's), debt instruments (bonds)*) are received and transmitted to the Bank's partners (brokers).

The relative importance to the order execution factors

1. *class of financial instruments - shares and depositary receipts, exchange traded products (shares of funds, ETF's) and derivatives (swaps, forwards, futures and other derivatives)*

The Bank has considered a number of factors that might be important when the Bank executes the orders. Price, costs, speed of execution, likelihood of execution and settlement, size and nature as well as other factors that may be relevant to the client order.

In order to ensure the best execution and to take in consideration the client's interests usually the Bank took into account respective order execution factors (indicated in the relative priority sequence):

- total costs of the service (including but not limited to the price of the financial instrument and the costs related to execution, including all expenses incurred by the client which are directly related to the execution of the order such as venue execution fees, clearing and settlement fees and any other fees, if any, paid to third parties involved in the execution of the order);
- volume, specifics of the transaction and its impact on the market;
- likelihood and speed of the transaction and settlement;
- other aspects that the Bank considers important when executing or placing orders, i.e. potential risk of the partner involved in order execution, type of financial instrument and type of order, market situation and the possible venue of the order execution.

However, in some cases, for example, if it is impossible to determine the deadline for executing an order or several intermediaries may be involved in the transaction, the best result may be achieved taking into account other parameters, if this does not contradict the client's interests.

2. *class of financial instruments - debt instruments (bonds)*

To ensure best execution and to take in consideration the clients' interests the Bank evaluated respective factors in transactions with bonds - the price of financial instrument, then speed of execution, costs, likelihood of execution and risk of the partner involved in the transaction.

Information on Bank's Order Execution Policy is available at:

http://www.rigensisbank.com/en/par_banku/dokumenti.html

Close links, conflicts of interest, common ownership with respect to execution venues

The Bank was not closely associated with any of the places of execution of orders (no joint ownership), which could lead to a conflict of interest.

Arrangements with execution venues regarding payments and benefits

The Bank did not have any special arrangements with execution venues regarding payments made or received, discounts, rebates or non-monetary benefits.

Changes in the list of order execution venues

There were no changes in the list of order execution venues in year 2018 regarding respective financial instruments categories: *shares and depositary receipts, exchange traded products (shares of funds, ETF's) and derivatives (swaps, forwards, futures and other derivatives)*.

The Bank, taking care on quality of its clients' orders execution in *debt instruments (bonds)*, continued to expand the list of order execution venues and in 2018 established new counterparty relations with Reuss Private AG (LEI 2138006B1AY18VCA6K15) and Pareto Securities AB (LEI 743700NDOKFSKZEMDX22).

Order execution differences according to the clients' categorization

The Bank did not use different approaches in order execution regarding client's categorization. However, in some circumstances, the Bank may determine that the status of the client (retail or professional) may be important in order execution.