

MiFiD II Top 5 Execution Venues Reporting Information

30th April 2019

The Markets in Financial Instruments Directive - MiFiD II mandates that investment firms, as part of their best execution obligations, report their top five venues for all trading on behalf of clients. Firms are required to make an annual public disclosure detailing these order routing practices for retail and professional clients across all asset classes.

Requirement of the Directive

Best execution rules are intended to protect investors by ensuring that investment firms seek the best possible result for their clients, taking into account price, costs, speed, likelihood of execution and settlement, size, nature or any other consideration relevant to the execution of the order.

For each class of financial instruments, Investment firms are to publish 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 required to be provided is as follows:

- 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;**

Praude Asset Management Limited (PAML) operates within the parameters set out in its Best Execution Policy. For the purposes of this disclosure, PAML deals in two asset classes, namely Equities and Derivatives. In accordance with the Best Execution Policy, PAML ranks each of the execution factors on an equal basis.

- b) **A description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders;**

There are no close links, conflicts of interests or common ownership with any of the execution venues used to execute orders.

- c) **A description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received;**

There are no specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits.

- 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;**

The previous execution venue was specifically chosen by a client. That mandate has since been terminated therefore we are no longer obliged to use that venue. We have since on boarded a new client and selected the listed companies as our execution venues.

- 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;**

PAML is licenced to provide its services to Professional Clients and Eligible Counterparties and all orders are treated equally.

- 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;**

Not applicable. PAML is not licenced to provide its services to retail clients.

- 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;**

PAML does not use any data or tools relating to the quality of execution. The Traders monitor the execution quality and the quality and appropriateness of the execution arrangements. PAML also provides its Traders with access to the latest trading tools and platforms.

- h) where applicable, an explanation of how the investment firm has used output of a consolidated tape provider.**

Not applicable. There are currently no consolidated tape providers in Europe.

The data above is based on execution data during the period from 1st January 2018 to 31st December 2018 inclusive. This new legislation requires the reporting of executed orders in three bands - passive, aggressive or directed orders for the previous year. We are reporting such data on a 'good assumption' basis which may not be 100% correct, but reasonably correct.