



## **TOP 5 BROKERS WHERE CLIENT ORDERS ARE TRANSMITTED**

### **2019 ANNUAL REPORT**

Date: 30<sup>th</sup> April, 2020

For each category of financial instruments, AJK Wealth Management Limited establishes and publishes, once a year, on its website, a ranking of the top five brokers to which it has submitted / transmitted client orders during the preceding year, which have in turn been executed. This ranking is established on the basis of the volume and number of executed orders having been submitted / transmitted to each broker, expressed as a percentage of the total volume and of the total number of executed orders having been submitted / transmitted for each category of financial instruments.

AJK Wealth Management Limited publishes this information separately for professional clients and for non-professional clients.

It should be noted that with regard to the exact interpretation of the terms 'Passive Orders' and 'Aggressive' orders, the reports are constructed based on the understanding that 'Passive Orders' correspond to SELL orders, whereas 'Aggressive Orders' correspond to BUY orders. Under RTS 28:

'Passive order' means an order entered into the order book that provided liquidity; in other words these are orders placed with a price limit.

'Aggressive order' means an order entered into the order book that took liquidity; in other words these orders are placed at market.

'Direct order' means an order for which the customer gives specific instructions to the broker or dealer for the order to be routed to a particular exchange or venue for execution.

This Report is intended to cover the period from 01/01/2019 to 31/12/2019.



**Publication of Top 5 Brokers under MiFID II**

<b>Class of Instrument</b>			<b>MONEY MARKET FUNDS</b>		
<b>Notification if &lt; 1 average trade per business day in the previous year</b>			<b>Y</b>		
<b>Client Categorization</b>			<b>Professional</b>		
<b>Top 5 brokers ranked in terms of trading volumes</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders transmitted as 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>
<b>Bank of Cyprus - PQ0RAP85KK9Z75ONZW93</b>	37.11%	36.84%	42.86%	57.14%	N/A
<b>UBS - BFM8T61CT2L1QCEMIK50</b>	35.06%	47.37%	44.44%	55.56%	N/A
<b>Barclays - G5GSEF7VJP5I7OUK5573</b>	17.38%	5.26%	100.00%	0.00%	N/A
<b>Julius Baer - 254900995QZI3T80Z744</b>	10.45%	10.53%	100.00%	0.00%	N/A



**Publication of Top 5 Brokers under MiFID II**

Class of Instrument			BONDS		
Notification if < 1 average trade per business day in the previous year			N		
Client Categorization			Professional		
Top 5 brokers ranked in terms of trading volumes	Proportion of volume traded as a percentage of total in that class	Proportion of orders transmitted as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Barclays - G5GSEF7VJP5I7OUK5573	60.91%	49.96%	38.72%	61.28%	N/A
UBS - BFM8T61CT2L1QCEMIK50	10.59%	18.33%	11.90%	88.10%	N/A
Bank of Cyprus - PQ0RAP85KK9Z75ONZW93	10.50%	12.65%	14.37%	85.63%	N/A
EFG (MONACO) - 5299008QDTJDTAPUDC71	7.82%	4.15%	19.30%	80.70%	N/A
Bank of Singapore - 5493002HXPWNWONL4B16	3.54%	6.55%	2.22%	97.78%	N/A



**Publication of Top 5 Brokers under MiFID II**

<b>Class of Instrument</b>			<b>EQUITIES</b>		
<b>Notification if &lt; 1 average trade per business day in the previous year</b>			<b>Y</b>		
<b>Client Categorization</b>			<b>Professional</b>		
<b>Top 5 brokers ranked in terms of trading volumes</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders transmitted as 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>
<b>Eurobank EFG Cyprus - 5493004KSNEM4U7L8714</b>	80.53%	16.37%	39.15%	60.75%	N/A
<b>Barclays - G5GSEF7VJP5I7OUK5573</b>	19.47%	83.63%	100.00%	0.00%	N/A



**Publication of Top 5 Brokers under MiFID II**

<b>Class of Instrument</b>			<b>MUTUAL FUNDS</b>		
<b>Notification if &lt; 1 average trade per business day in the previous year</b>			<b>Y</b>		
<b>Client Categorization</b>			<b>Professional</b>		
<b>Top 5 brokers ranked in terms of trading volumes</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders transmitted as 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>
<b>EFG (MONACO) - 5299008QDTJDTAPUDC71</b>	61.11%	77.78%	2.38%	97.62%	N/A
<b>Barclays - G5GSEF7VJP5I7OUK5573</b>	27.81%	15.74%	47.06%	52.94%	N/A
<b>UBS - BFM8T61CT2L1QCCEMIK50</b>	11.09%	6.48%	100.00%	0.00%	N/A



## INFORMATION ON THE QUALITY OF EXECUTION OBTAINED

### 2019 ANNUAL REPORT

Date: 30<sup>th</sup> April, 2020

#### ***Introduction***

*The Markets in Financial Instruments Directive 2014/65/EU (the “MiFID II”), the Commission Delegated Regulation (EU) 2017/565 (“CDR 2017/565”) as well as the Commission Delegated Regulation (EU) 2017/576 (RTS 28) introduced new requirements on the information which must be published to the market in relation to the best execution reporting requirements.*

In this respect, AJK Wealth Management Limited (“AJK Wealth” or the “Company”) has published this report on the quality of execution obtained which is based on the summary of the analysis and monitoring of execution obtained in relation to the third-party entities (brokers) to which the Company transmitted Client orders during the period from 01/01/2019 to 31/12/2019 in regards to the following asset classes, as presented in RTS 28:

- Debt instruments – Bonds
- Equities – Shares

This document presents a combined analysis of the quality of execution obtained when the Company is transmitting Client orders to other entities for execution with respect to the above-mentioned asset classes.

#### ***Execution Factors and relative importance***

##### **A. DEBT INSTRUMENTS**

The bonds market was fragmented and often subject to limited liquidity and price transparency. Therefore, these instruments were traded OTC.

Unless specifically instructed, the primary execution factor was price. There were circumstances that factors other than price took precedence in order to achieve best execution / act in the Client’s best interest such as costs, speed, likelihood of execution and settlement and the size and nature of the order.

##### **B. EQUITY INSTRUMENTS**

The price was generally regarded as the primary factor for obtaining best execution unless and specific instructions by the Client required otherwise. There were circumstances that factors other than price took precedence in order to achieve best execution / act in the Client’s best interest such as costs, speed, likelihood of execution and settlement and the size and nature of the order.

#### ***Retail clients and total consideration***

For Retail Clients, the emphasis in achieving the best possible result was determined in terms of the total consideration, representing the price of the Financial Instruments and the cost



related to execution, which included all expenses incurred by the Client (e.g. Execution Venue fees, clearing and settlement fees and any other fees paid to third parties involved in the execution of the order).

In certain cases, the Company could give precedence to other factors, such as the likelihood of execution and settlement, speed and the size and nature of the order.

***Client categorization with respect to execution***

All Clients of the Company are categorized as either Retail Clients or Professional Clients and there were not any differences in order execution arrangements due to the Client categorization.

***Close Links, conflict of interest and common ownership***

In 2019, the Company has not recorded any conflicts of interest with respect to the brokers used for execution of Client orders. Also, the Company has established all the necessary controls and monitoring arrangements and mechanisms so as to ensure that the identification and prevention of conflicts of interest was achieved at all times.

Further to the above, the Company maintains a policy which forbids the reception of any monetary or non-monetary benefits from third parties.

***Specific arrangements***

The Company does not have specific arrangements with any Execution Venues / brokers regarding payments made or received, discounts, rebates or non-monetary benefits received.

***Summary of Analysis and Conclusions***

The Company took all sufficient steps in order to deliver best execution and act in the best interest of its Clients. In this respect, AJK Wealth has in place a Best Execution Policy, as well as other policies, procedures, controls and monitoring processes, which are designed to achieve the best possible result on a consistent basis.