

# Best execution report according to the regulation no 2017/576 (RTS 28)

## 2023

AS Redgate Capital summarises and publishes each year for each class of financial instruments the top five execution venues in terms of trading volumes and a summary of the analysis and conclusions we have drawn from the detailed monitoring of the quality of execution obtained on the execution venues where we have executed client orders in the previous year. The information is presented in accordance with the technical standards developed under Commission Delegated Regulation (EU) 2017/576 (i.e. RTS 28).

### Order handling and execution

(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.*

We have published our *Best execution policy* on our website: <https://redgatewealth.eu/en/our-services/our-internal-rules/>

Most important execution criteria for equities, bonds and fund units are

- availability of trading counterparty / access to trading venue
- execution price,
- cost of execution,
- execution speed and likelihood.

### Close links

(b) *a description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders.*

AS Redgate Capital does not have any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders.

### Specific arrangements with execution venues

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

AS Redgate Capital has special pricelist with its main custodian AS SEB Pank. Price conditions with AS SEB Pank have been applied to AS Redgate Capital pricelist which is effective for all AS Redgate Capital clients. AS Redgate Capital does not

have any other specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received.

(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;*

Pareto Securities AS and Gottex Securities AB have been added to list of Brokers of AS Redgate Capital.

(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;*

For retail clients no other parameter than execution price and transaction costs were considered.

(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;*

AS Redgate Capital does not use any data or tools relating to the quality of execution, including any data published under Delegated Regulation (EU) 2017/575.

(h) *where applicable, an explanation of how the investment firm has used output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU.*

AS Redgate Capital has not used output of a consolidated tape provider.

# Top 5 brokers

## Retail clients

Class of Instrument	Bonds				
Notification if < 1 average trade per business day in the previous year	N				
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 executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
AS Redgate Capital, 89450046FFTAQ2X5RM52	92,86%	93,99%			
Pareto Securities AS, 549300H0QDQHRJXRM779	2,38%	5,27%			
AS SEB Pank, 549300ND1MQ8SNNYMJ22	4,76%	0,75%			

Class of Instrument	Tick size liquidity bands 3 and 4 (from 80 to 1999 trades per day)				
Notification if < 1 average trade per business day in the previous year	N				
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 executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
AS SEB Pank, 549300ND1MQ8SNNYMJ22	100%	100%			

Class of Instrument	Tick size liquidity band 1 and 2 (from 0 to 79 trades per day)				
Notification if < 1 average trade per business day in the previous year	N				
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 executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
AS Redgate Capital, 89450046FFTAQ2X5RM52	100%	100%			

Class of Instrument	Exchange traded products (Exchange traded funds, exchange traded notes and exchange traded commodities)				
Notification if < 1 average trade per business day in the previous year	N				
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 executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
AS SEB Pank, 549300ND1MQ8SNNYMJ22	100%	100%			

## Professional clients

Class of Instrument	Bonds				
Notification if < 1 average trade per business day in the previous year	N				
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 executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
AS Redgate Capital, 89450046FFTAQ2X5RM52	69,70%	87,60%			
Gottex Securities AB, 549300NUBCPBLVYI6F75	21,21%	6,84%			
Pareto Securities AS, 549300H0QDQHRJXRM779	6,06%	5,33%			
AS SEB Pank, 549300ND1MQ8SNNYMJ22	3,03%	0,23%			

Class of Instrument	Tick size liquidity band 1 and 2 (from 0 to 79 trades per day)				
Notification if < 1 average trade per business day in the previous year	N				
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 executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
AS LHV Pank, 529900GJOSVHI055QR67	100%	100%			

Class of Instrument	Exchange traded products (Exchange traded funds, exchange traded notes and exchange traded commodities)				
Notification if < 1 average trade per business day in the previous year	N				
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 executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
AS SEB Pank, 549300ND1MQ8SNNYMJ22	100%	100%			