



Best Execution – Top 5 Execution Venues 2019

In accordance with the Investment Services and Activities and Regulated Markets Law of 2017 (Law 87(I)/2017) and Regulation (EU) 2017/565 of 25 April 2016, FREEDOM FINANCE CYPRUS LIMITED (the Company) is required to make public on an annual basis:

- for each class of financial instruments, the top five execution venues in terms of trading volumes where it executed client orders in the preceding year and information on the quality of execution obtained;
- for each class of financial instruments, the top five entities (e.g. brokers) to which the Company transmitted or placed client orders for execution in the preceding year;
- a summary of the analysis and conclusions they draw from their detailed monitoring of the quality of execution obtained.

Reporting period: 2019

The Company did not execute clients' orders on execution venues as they determined in Article 64 of the Regulation (EU) 2017/565 (regulated market, an MTF, an OTF, a systematic internaliser, or a market maker or other liquidity provider or an entity that performs a similar function in a third country to the functions performed by any of the foregoing) during the reporting period.

Top five entities to which the Company transmitted clients' orders for execution broken down by class of financial instrument.

Retail clients

Class of Instrument	Equities - Shares & Depository Receipts				
Notification if < 1 average trade per business day in the previous year	N				
Top five entities (brokers) 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
LEK Securities U.K. Limited	89,67%	76,62%	N/A	N/A	N/A
FFIN Brokerage Services Inc., Beliz IBC	9,12%	13,71%	N/A	N/A	N/A
IC Freedom Finance LLC, Russia	0,72%	7,36%	N/A	N/A	N/A
XNT LTD, Malta	0,30%	0,87%	N/A	N/A	N/A
TRADERNET LIMITED	0,19%	1,45%	N/A	N/A	N/A

Class of Instrument	Exchange Traded Funds				
Notification if < 1 average trade per business day in the previous year	N				
Top five entities (brokers) ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage	Proportion of orders executed as percentage	Percentage of passive orders	Percentage of	Percentage of directed orders

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	of total in that class	of total in that class		aggressive orders	
LEK Securities U.K. Limited	99,96%	95,82%	N/A	N/A	N/A
IC Freedom Finance LLC, Russia	0,03%	3,41%	N/A	N/A	N/A
TRADERNET LIMITED	0,01%	0,50%	N/A	N/A	N/A
XNT LTD, Malta	0,00%	0,27%	N/A	N/A	N/A

Class of Instrument	Debt Instruments - Bonds				
Notification if < 1 average trade per business day in the previous year	Y				
Top five entities (brokers) 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
TRADERNET LIMITED	77,34%	16,79%	N/A	N/A	N/A
LEK Securities U.K. Limited	22,41%	1,53%	N/A	N/A	N/A
IC Freedom Finance LLC, Russia	0,25%	81,68%	N/A	N/A	N/A

Class of Instrument	Equity Derivatives - Options and Futures admitted to trading on a trading venue				
Notification if < 1 average trade per business day in the previous year	N				
Top five entities (brokers) 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
LEK Securities U.K. Limited	93,77%	9,01%	N/A	N/A	N/A
IC Freedom Finance LLC, Russia	6,19%	19,31%	N/A	N/A	N/A
XNT LTD, Malta	0,04%	71,67%	N/A	N/A	N/A

Professional clients

Class of Instrument	Equities - Shares & Depositary Receipts				
Notification if < 1 average trade per business day in the previous year	N				

Top five entities (brokers) ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage	Proportion of orders executed as percentage	Percentage of passive orders:	Percentage of	Percentage of directed orders
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