

Information on the quality of execution of orders for 2023

In accordance with the requirements of the DELEGATED REGULATION (EU) 2017/576 OF THE COMMISSION of June 8, 2016 supplementing Directive 2014/65/EU of the European Parliament and of the Council regarding the regulatory technical standards for the annual publication by investment intermediaries of identification data on the locations where they carry out their activities, as well as information on the quality of their performance.

I. Client's order execution factors and their relative importance

In order to attain the most favorable outcome for its clients, „Investbank“ JSC considers the following factors when carrying out their orders:

- ✓ Execution price;
- ✓ Implementation costs;
- ✓ Execution speed;
- ✓ The probability of execution and settlement;
- ✓ Size of the order;
- ✓ Nature of order;
- ✓ Any additional factors that are pertinent to the execution of the order.

The bank evaluates the significance of the aforementioned factors by considering multiple criteria, including:

- ✓ the client's classification as a professional or non-professional client;
- ✓ the characteristics of the financial instruments involved in the order;
- ✓ the characteristics of the execution venues to which an order may be directed;
- ✓ the characteristics of the order itself and the financial instruments to which it pertains.

In general, the execution price is the most crucial factor as „Investbank“ JSC aims to secure the most advantageous price for their clients. However, depending on the client's characteristics, other factors may hold greater importance. For instance, professional clients may prioritize transaction speed, while non-professional clients without specific execution directions may prioritize the total transaction value. Thus, in each unique case, the bank endeavors to evaluate the significance of all the factors mentioned above.

Additional examples can demonstrate cases where the bank prioritizes factors other than the execution price, based on the criteria mentioned above. For instance, the speed of execution may be of higher importance for certain orders, or the characteristics of the execution venue may be significant for securities financing transactions with professional clients. In some scenarios, security and speed may be more significant than price, such as in the case of purchasing large blocks of securities for gaining control or a blocking minority interest in the issuing company. Securities financing transactions, which serve a unique financing purpose, may also require a different execution venue than other transactions, thus making the characteristics of the venue particularly relevant.

The following are the primary criteria that „Investbank“ JSC considers when assessing the significance of the execution factors for the best possible outcome, based on the client's classification, the existence of multiple competitive execution venues, and the selection of an individual or entity to whom the bank transmits customer orders for financial instrument transactions.

When executing an order for a non-professional client, the Bank assesses the best possible outcome for the client by considering the total transaction value, which encompasses the financial instrument's price and all costs linked to executing the order. These costs comprise all expenses directly associated with executing the order, such as fees charged by the place of execution, clearing and settlement fees, as well as any other fees paid to third parties in relation to the order's execution.

II. Close relationships, conflicts of interest and common ownership in relation to places of execution of orders

„Investbank“ JSC does not have any close relationships, conflicts of interest and common ownership in relation to places of execution of orders

III. Special agreements made with execution venues concerning payments made or received, discounts, rebates, or non-monetary benefits obtained

„Investbank“ JSC does not have any special agreements made with execution venues concerning payments made or received, discounts, rebates, or non-monetary benefits obtained.

IV. Change in the list of execution venues

As an investment intermediary, „Investbank“ JSC chooses execution venues based on the factors and criteria outlined in its Policy for executing client orders. The Bank executes client orders using leading brokers, systematic participants, and multilateral trading systems identified in publicly available reports on execution venue identification data.

Since 2019, „Investbank“ JSC has partnered with CFP Trading Limited, a leading broker, to provide emission allowance trading services for its clients. This service includes any units recognized as complying with the requirements of Directive 2003/87/EO of the European Parliament and of the Council, which establishes a greenhouse gas emission allowance trading scheme within the Community and amends Directive 96/61/EO. As part of this partnership, ICE has been added as an execution venue. The complete list of execution venues is detailed in the Policy for executing client orders.

V. Other factors that were prioritized over the immediate execution price and transaction costs when executing orders for non-professional clients

In 2023, the primary factors considered for executing client orders for non-professional clients are the price and cost.

VII. Description of the manner in which IP „Investbank“ JSC used any data or methods related to the quality of execution

To assess the order execution quality, „Investbank“ JSC uses data from its own systems that manage transactions with financial instruments, including order acceptance, execution, and processing, as well as data from interbank market transactions, confirmations, and reports provided by execution venues where the Bank conducts transactions on behalf of clients or transmits client orders for execution.

VIII. Description of how the investment intermediary used the results of a consolidated data provider established in accordance with Article 65 of Directive 2014/65/EU

„Investbank“ JSC did not utilize a consolidated data provider established under Article 65 of Directive 2014/65/EU in the year 2023.