# C CBL ASSET MANAGEMENT

# **Top 5 Execution Venue Report, 2023**

# Execution data on our top five execution venues for each class of financial instrument

1 January 2023 to 31 December 2023

#### Disclaimer and contact information

This report provides annual information required by the Commission Delegated Regulation (EU) 2017/576 on the quality of execution, obtained from the CBL Asset Management IPAS top five trading venues. The data covers the period from 1 January to 31 December 2023.

Although all reasonable care has been taken in obtaining, processing and presenting the data referred to in this report, CBL Asset Management IPAS does not make any representations or warranties, Express or implied, as to the quality, completeness, reliability or accuracy of the data which may in some instances be or become incomplete or incorrect.

This report has been prepared by CBL Asset Management IPAS, a European Asset Manager under the supervision of the Bank of Latvia. For further information please contact:

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#### **Table of Contents**

| 1. | Top 5 Execution Venues                       | . 2 |
|----|--|-----|
| 2. | Quality of execution - report by asset class | . 6 |

# 1. Top 5 Execution Venues

# 1.1. Equities

# **Retail clients**

| Class of Instrument:   | Equities  | Equities   |                                    |                                       |                               |  |  |
|--|---|--|------------------------------------|---------------------------------------|-------------------------------|--|--|
| Notification if <1 average<br>trade per business day in the<br>previous year (Y/N) | Υ   |  |                                    |                                       |                               |  |  |
| Top five execution venues ranked in terms of trading volumes (descending order)    | Proportion of<br>volume traded as a<br>percentage of total<br>in that class | Proportion of<br>orders executed<br>as a percentage<br>of total in that<br>class | Percentage of<br>passive<br>orders | Percentage of<br>aggressive<br>orders | Percentage of directed orders |  |  |
| CITADELE BANKA, AKCIJU<br>SABIEDRĪBA<br>(2138009Y59EAR7H1U097)                     | 100%  | 100%   | 0                                  | 0                                     | 0                             |  |  |
|  |   |  |                                    |                                       |                               |  |  |
|  |   |  |                                    |                                       |                               |  |  |
|  |   |  |                                    |                                       |                               |  |  |
|  |   |  |                                    |                                       |                               |  |  |

#### **Professional clients**

| Class of Instrument:   | Equities  | Equities   |                                    |                                 |                                     |  |  |
|--|---|--|------------------------------------|---------------------------------|-------------------------------------|--|--|
| Notification if <1 average<br>trade per business day in the<br>previous year (Y/N) | Υ   |  |                                    |                                 |                                     |  |  |
| Top five execution venues ranked in terms of trading volumes (descending order)    | Proportion of<br>volume traded as a<br>percentage of total<br>in that class | Proportion of<br>orders executed<br>as a percentage<br>of total in that<br>class | Percentage of<br>passive<br>orders | Percentage of aggressive orders | Percentage of<br>directed<br>orders |  |  |
| CITADELE BANKA, AKCIJU<br>SABIEDRĪBA<br>(2138009Y59EAR7H1U097)                     | 100%  | 100%   | 0                                  | 0                               | 0                                   |  |  |
|  |   |  |                                    |                                 |                                     |  |  |
|  |   |  |                                    |                                 |                                     |  |  |
|  |   |  |                                    |                                 |                                     |  |  |

#### 1.2. Debt instruments

# **Retail clients**

| Class of Instrument:   | Bonds   | Bonds  |                                    |                                 |                               |  |
|--|---|--|------------------------------------|---------------------------------|-------------------------------|--|
| Notification if <1 average<br>trade per business day in the<br>previous year (Y/N) | Y   |  |                                    |                                 |                               |  |
| Top five execution venues ranked in terms of trading volumes (descending order)    | Proportion of<br>volume traded as a<br>percentage of total<br>in that class | Proportion of<br>orders executed<br>as a percentage<br>of total in that<br>class | Percentage of<br>passive<br>orders | Percentage of aggressive orders | Percentage of directed orders |  |
| CITADELE BANKA, AKCIJU<br>SABIEDRĪBA<br>(2138009Y59EAR7H1U097)                     | 100%  | 100%   | 0                                  | 0                               | 0                             |  |

#### **Professional clients**

| Class of Instrument:   | Bonds   | Bonds  |                                    |                                 |                                     |  |
|--|---|--|------------------------------------|---------------------------------|-------------------------------------|--|
| Notification if <1 average trade<br>per business day in the<br>previous year (Y/N) | Υ   |  |                                    |                                 |                                     |  |
| Top five execution venues ranked in terms of trading volumes (descending order)    | Proportion of<br>volume traded as<br>a percentage of<br>total in that class | Proportion of orders executed as a percentage of total in that class | Percentage<br>of passive<br>orders | Percentage of aggressive orders | Percentage of<br>directed<br>orders |  |
| CITADELE BANKA, AKCIJU<br>SABIEDRĪBA<br>(2138009Y59EAR7H1U097)                     | 100%  | 100%   | 0                                  | 0                               | 0                                   |  |
|  |   |  |                                    |                                 |                                     |  |
|  |   |  |                                    |                                 |                                     |  |
|  |   |  |                                    |                                 |                                     |  |
|  |   |  |                                    |                                 |                                     |  |

# 1.3. Currency derivatives

# **Retail clients**

No transactions.

# **Professional clients**

| Class of Instrument:   | Currency derivat   | Currency derivatives   |                              |                                 |                               |  |
|--|--|--|------------------------------|---------------------------------|-------------------------------|--|
| Notification if <1 average trade<br>per business day in the<br>previous year (Y/N) | Υ  |  |                              |                                 |                               |  |
| Top five execution venues ranked in terms of trading volumes (descending order)    | Proportion of<br>volume traded<br>as a percentage<br>of total in that<br>class | Proportion of orders executed as a percentage of total in that class | Percentage of passive orders | Percentage of aggressive orders | Percentage of directed orders |  |
| CITADELE BANKA, AKCIJU<br>SABIEDRĪBA<br>(2138009Y59EAR7H1U097)                     | 100%   | 100%   | 0                            | 0                               | 0                             |  |
|  |  |  |                              |                                 |                               |  |
|  |  |  |                              |                                 |                               |  |
|  |  |  |                              |                                 |                               |  |
|  |  |  |                              |                                 |                               |  |

# 1.4. Exchange traded products

# **Retail clients**

| Class of Instrument: | Exchange traded funds, ETF |
|----------------------|----------------------------|
|----------------------|----------------------------|

| Notification if <1 average trade per business day in the previous year (Y/N)    | Υ   |  |   |                                       |                                     |
|---|---|--|---|---------------------------------------|-------------------------------------|
| Top five execution venues ranked in terms of trading volumes (descending order) | Proportion of<br>volume traded as<br>a percentage of<br>total in that class | Proportion of<br>orders executed<br>as a percentage<br>of total in that<br>class |   | Percentage of<br>aggressive<br>orders | Percentage of<br>directed<br>orders |
| CITADELE BANKA, AKCIJU<br>SABIEDRĪBA<br>(2138009Y59EAR7H1U097)                  | 100%  | 100%   | 0 | 0                                     | 0                                   |
|   |   |  |   |                                       |                                     |
|   |   |  |   | ·                                     |                                     |
|   | _   |  |   |                                       |                                     |
|   |   |  |   |                                       |                                     |

# **Professional clients**

| Class of Instrument:  | Exchange traded for   | Exchange traded funds, ETF   |   |                                 |                               |  |
|---|---|--|---|---------------------------------|-------------------------------|--|
| Notification if <1 average trade per business day in the previous year (Y/N)    | Y   |  |   |                                 |                               |  |
| Top five execution venues ranked in terms of trading volumes (descending order) | Proportion of<br>volume traded as<br>a percentage of<br>total in that class | Proportion of<br>orders executed<br>as a percentage<br>of total in that<br>class |   | Percentage of aggressive orders | Percentage of directed orders |  |
| CITADELE BANKA, AKCIJU<br>SABIEDRĪBA<br>(2138009Y59EAR7H1U097)                  | 100%  | 100%   | 0 | 0                               | 0                             |  |
|   |   |  |   |                                 |                               |  |
|   |   |  |   |                                 |                               |  |
|   |   |  |   |                                 |                               |  |
|   |   |  |   |                                 |                               |  |

# 1.5. Other financial instruments

#### **Retail clients**

| Class of Instrument:   | Investment funds (  | Investment funds (non-ETF)   |   |                                 |                               |  |
|--|---|--|---|---------------------------------|-------------------------------|--|
| Notification if <1 average trade<br>per business day in the<br>previous year (Y/N) | N   |  |   |                                 |                               |  |
| Top five execution venues ranked in terms of trading volumes (descending order)    | Proportion of<br>volume traded as<br>a percentage of<br>total in that class | Proportion of<br>orders executed<br>as a percentage<br>of total in that<br>class |   | Percentage of aggressive orders | Percentage of directed orders |  |
| CITADELE BANKA, AKCIJU<br>SABIEDRĪBA<br>(2138009Y59EAR7H1U097)                     | 100%  | 100%   | 0 | 0                               | 0                             |  |
|  |   |  |   |                                 |                               |  |
|  |   |  |   |                                 |                               |  |
|  |   |  |   |                                 |                               |  |

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|-----|--|--|---|
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# **Professional clients**

| Class of Instrument:  | Investment funds (non-ETF)  |  |   |                                 |                               |  |  |  |  |
|---|---|--|---|---------------------------------|-------------------------------|--|--|--|--|
| Notification if <1 average trade per business day in the previous year (Y/N)    | N   |  |   |                                 |                               |  |  |  |  |
| Top five execution venues ranked in terms of trading volumes (descending order) | Proportion of<br>volume traded as<br>a percentage of<br>total in that class | Proportion of<br>orders executed<br>as a percentage<br>of total in that<br>class |   | Percentage of aggressive orders | Percentage of directed orders |  |  |  |  |
| CITADELE BANKA, AKCIJU<br>SABIEDRĪBA<br>(2138009Y59EAR7H1U097)                  | 100%  | 100%   | 0 | 0                               | 0                             |  |  |  |  |
|   |   |  |   |                                 |                               |  |  |  |  |
|   |   |  |   |                                 |                               |  |  |  |  |
|   |   |  |   |                                 |                               |  |  |  |  |
|   |   |  |   |                                 |                               |  |  |  |  |

#### 2. Quality of execution - report by asset class

#### Asset classes

#### Information on execution factors

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

#### Information on close links or COI (conflicts of interest)

an explanation of the relative a description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders

#### Information on arrangements

a description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or nonmonetary benefits received

#### Information on change factors

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

#### Information to be included in the quality of execution description

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

#### Information to be included in the quality of execution description

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

#### Equities

Likehood of execution and settlement: Settlement reliability.

When executing your order CBLAM may choose to utilize either affiliated or nonaffiliated brokers to assist in the execution of client trades. The use of affiliates provides specific benefits to client executions, these factors include but are not limited to governance. oversight and transparency of an order, consistency of order handling and front to back trade processing. Whilst aware of potential conflicts of interest in using affiliates to execute your transactions, CBLAM will seek to mitigate such conflicts through our monitoring and review programme, CBLAM usually choses the brokerage service provider, with whom the client has entered in agreement for custody and brokerage of his/her/its investment portfolio.

CBLAM may not receive any type of remuneration, discount or nonmonetary benefit that violates the applicable regulations regarding conflicts of interest and incentives for directing orders from its clients to a specific financial intermediary. CBLAM does not participate in any payment for order flow arrangements. CBLAM will not unfairly discriminate between Execution Venues or types (i.e. brokers). CBLAM will not structure or charge commissions in such a way as to discriminate unfairly between execution venues.

CBLAM periodically reviews the Execution venues it accesses directly at least on an annual basis, taking into account the following factors: general prices available, depth of liquidity, relative volatility of the market, speed of execution, cost of execution, quality and cost of clearing and settlement. As part of the review process to and entities for execution provide for the best possible result, CBLAM will

assess whether the execution venues take the information published by trading venues and entities. Following such periodic review, the list of accessible Execution venues may be updated as and when necessary.

No discrimination for PEUSA either.

In general, when executing orders, CBLAM will assign the highest relative importance to price and cost. However, in some circumstances, the relative importance of these factors may vary, and others may become more important than price and cost for the purpose of obtaining the best possible outcome. This will occur when, in the opinion of CBLAM, the characteristics of the client, the order, the execution venues or the financial instruments themselves make this necessary or recommendable. For example: - In execution venues with high levels of price volatility, speed of execution may become a priority - In execution venues that have little liquidity, merely executing the order may, in itself,

#### Debt instruments

Price: Likehood of execution and settlement; Settlement reliability.

When executing your order CBLAM may choose to utilize either affiliated or nonaffiliated brokers to assist in the execution of client trades. The use of affiliates provides specific benefits to client executions, these factors include but are not limited to governance, oversight and transparency of an order, consistency of order handling and front to back trade processing. Whilst aware of potential conflicts of interest in using affiliates to execute your transactions, CBLAM will seek to mitigate such conflicts through our monitoring and review programme. CBLAM usually choses the brokerage service provider,

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CBLAM periodically reviews the Execution venues it accesses directly at least on an annual basis, taking into account the following factors: general prices available, depth of liquidity. relative volatility of the market, speed of execution, cost of execution, quality and cost of clearing and settlement. As part of the review process to assess whether the execution venues and entities for execution provide for the best possible result, CBLAM will take the information published by

trading venues and entities. Following

such periodic review, the list of

accessible Execution venues may be

No discrimination for PEUSA either.

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constitute best execution.

|                                |   | with whom the client has entered in agreement for custody and brokerage of his/her/its investment portfolio.  |  | updated as and when necessary.   |                                     | become a priority - In execution<br>venues that have little liquidity, merely<br>executing the order may, in itself,<br>constitute best execution.  |
|--------------------------------|---|---|--|--|-------------------------------------|---|
| Currency<br>derivatives        | Likehood of execution and<br>settlement;<br>Settlement reliability;<br>Size and nature of the<br>Transaction. | When executing your order CBLAM may choose to utilize either affiliated or nonaffiliated brokers to assist in the execution of client trades. The use of affiliates provides specific benefits to client executions, these factors include but are not limited to governance, oversight and transparency of an order, consistency of order handling and front to back trade processing. Whilst aware of potential conflicts of interest in using affiliates to execute your transactions, CBLAM will seek to mitigate such conflicts through our monitoring and review programme. CBLAM usually choses the brokerage service provider, with whom the client has entered in agreement for custody and brokerage of his/her/its investment portfolio. | CBLAM may not receive any type of remuneration, discount or non-monetary benefit that violates the applicable regulations regarding conflicts of interest and incentives for directing orders from its clients to a specific financial intermediary.  CBLAM does not participate in any payment for order flow arrangements. CBLAM will not unfairly discriminate between Execution Venues or types (i.e. brokers). CBLAM will not structure or charge commissions in such a way as to discriminate unfairly between execution venues. | CBLAM periodically reviews the Execution venues it accesses directly at least on an annual basis, taking into account the following factors: general prices available, depth of liquidity, relative volatility of the market, speed of execution, cost of execution, quality and cost of clearing and settlement. As part of the review process to assess whether the execution venues and entities for execution provide for the best possible result, CBLAM will take the information published by trading venues and entities. Following such periodic review, the list of accessible Execution venues may be updated as and when necessary.  | No discrimination for PEUSA either. | In general, when executing orders, CBLAM will assign the highest relative importance to price and cost. However, in some circumstances, the relative importance of these factors may vary, and others may become more important than price and cost for the purpose of obtaining the best possible outcome. This will occur when, in the opinion of CBLAM, the characteristics of the client, the order, the execution venues or the financial instruments themselves make this necessary or recommendable. For example: - In execution venues with high levels of price volatility, speed of execution may become a priority - In execution venues that have little liquidity, merely executing the order may, in itself, constitute best execution. |
| Exchange<br>traded<br>products | Likehood of execution and<br>settlement;<br>Settlement reliability.   | When executing your order CBLAM may choose to utilize either affiliated or nonaffiliated brokers to assist in the execution of client trades. The use of affiliates provides specific benefits to client executions, these factors include but are not limited to governance, oversight and transparency of an order, consistency of order handling and front to back trade processing. Whilst aware of potential conflicts of interest in using affiliates to execute your transactions, CBLAM will seek to mitigate such conflicts through our monitoring and review programme. CBLAM usually choses the brokerage service provider, with whom the client has entered in agreement for custody and brokerage of his/her/its investment portfolio. | CBLAM may not receive any type of remuneration, discount or non-monetary benefit that violates the applicable regulations regarding conflicts of interest and incentives for directing orders from its clients to a specific financial intermediary.  CBLAM does not participate in any payment for order flow arrangements. CBLAM will not unfairly discriminate between Execution Venues or types (i.e. brokers). CBLAM will not structure or charge commissions in such a way as to discriminate unfairly between execution venues. | CBLAM periodically reviews the Execution venues it accesses directly at least on an annual basis, taking into account the following factors: general prices available, depth of liquidity, relative volatility of the market, speed of execution, cost of execution, quality and cost of clearing and settlement.  As part of the review process to assess whether the execution venues and entities for execution provide for the best possible result, CBLAM will take the information published by trading venues and entities. Following such periodic review, the list of accessible Execution venues may be updated as and when necessary. | No discrimination for PEUSA either. | In general, when executing orders, CBLAM will assign the highest relative importance to price and cost. However, in some circumstances, the relative importance of these factors may vary, and others may become more important than price and cost for the purpose of obtaining the best possible outcome. This will occur when, in the opinion of CBLAM, the characteristics of the client, the order, the execution venues or the financial instruments themselves make this necessary or recommendable. For example: - In execution venues with high levels of price volatility, speed of execution may become a priority - In execution venues that have little liquidity, merely executing the order may, in itself, constitute best execution. |
| Other financial instruments    | Likehood of execution and<br>settlement;<br>Settlement reliability;   | When executing your order CBLAM may choose to utilize either affiliated or non-affiliated brokers to assist in the  |  | CBLAM periodically reviews the Execution venues it accesses directly at least on an annual basis, taking into account the  | No discrimination for PEUSA either. | In general, when executing orders,<br>CBLAM will assign the highest relative<br>importance to price and cost. However,  |

Size and nature of the Transaction.

execution of client trades. The use of affiliates provides specific benefits to client executions, these factors include but are not limited to governance, consistency of order handling and front CBLAM will seek to mitigate such conflicts through our monitoring and review programme. CBLAM usually choses the brokerage service provider, with whom the client has entered in agreement for custody and brokerage of his/her/its investment portfolio.

regulations regarding conflicts of interest and incentives for directing orders from its clients to a specific financial intermediary. CBLAM does not oversight and transparency of an order, participate in any payment for order flow of potential conflicts of interest in using or types (i.e. brokers). CBLAM will not for the best possible result, CBLAM will a way as to discriminate unfairly between execution venues.

following factors: general prices available. depth of liquidity, relative volatility of the market, speed of execution, cost of execution, quality and cost of clearing and settlement. As part of the review arrangements. CBLAM will not unfairly process to assess whether the execution to back trade processing. Whilst aware discriminate between Execution Venues venues and entities for execution provide affiliates to execute your transactions, structure or charge commissions in such take the information published by trading venues and entities. Following such periodic review, the list of accessible Execution venues may be updated as and when necessary.

in some circumstances, the relative importance of these factors may vary. and others may become more important than price and cost for the purpose of obtaining the best possible outcome. This will occur when, in the opinion of CBLAM, the characteristics of the client, the order, the execution venues or the financial instruments themselves make this necessary or recommendable. For example: - In execution venues with high levels of price volatility, speed of execution may become a priority - In execution venues that have little liquidity, merely executing the order may, in itself, constitute best execution.