

**Investment Service - Portfolio Management/Reception and Transmission  
Professional Clients**

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		Y			
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
CITILN-E57ODZWZ7FF32TWFA76	99.9857%	87.5000%	0.0000%	100.0000%	0.0000%
CIGMLN-XKZZ2JZF41MRHTR1V493	0.0143%	12.5000%	0.0000%	100.0000%	0.0000%

**Exchange traded products (Exchange traded funds, exchange traded notes and exchange traded commodities)**

(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;

The Firm is required to take all sufficient steps to obtain the best possible result for its clients taking into account the relevant best execution factors. The execution factors that must be considered when undertaking to deliver best execution are the following: price, costs, speed, likelihood of execution and settlement, size, nature, or any other consideration relevant to execution of the order (for example, the minimisation of the potential market impact of the execution of the order).

These factors can be given varying precedence in the trading process, dependent on the individual situation in each trade. The relative importance to the interests of each client to the above will help to establish best execution.

Although other execution factors may, in certain circumstances, be more important than price in obtaining best execution, it is generally assumed that price will be the first priority. However, the relevance of execution factors (and counterparty selection) will vary depending on the instrument class.

In the case of this instrument class, price is deemed to be the prevalent execution factor in the vast majority of the cases. If the prices offered by counterparties are similar, as a result of the deep liquidity offered by the market of this asset class, then the likelihood of execution and speed usually determine which counterparty to trade with. In cases when the Firm is faced with adverse market conditions, the balance between price and likelihood of execution might shift more towards likelihood of execution (and also speed) especially in cases when the Firm wants to dispose of the unwanted securities to limit any losses for its clients. When traded via an OTC derivative, such as through a total return swap, another important execution factor would be costs. This is relevant for when the counterparties charge a fee for the provision of the security. In such cases, the price and the costs charged are usually seen together so as to decide which counterparty to trade with.

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

The Firm has no close links or common ownership with any of the execution venues it utilises to execute orders.

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

Effective from 3 January 2018, the Firm's inducement policy was updated to be compliant with MiFID 2 rules, including specific provisions governing the receipt of research, as well as other monetary or non-monetary benefits. The policy implementing the MiFID 2 rules, requiring (inter alia) all research to be paid for, prohibiting the receipt of any monetary benefit, requiring pre-approval for any non-monetary benefit on the basis that no approval will be given unless it falls within the definition of an "acceptable minor non-monetary benefit" as that term is defined in MiFID 2.

The Firm pays for Research from its own balance sheet, has signed up to Research agreements with all brokers from which it is receiving Research, communicated with all other brokers that they must

not send any research and set up technology processes to monitor and block any unsolicited research.

(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;

There have been no changes to the list of execution venues in 2020

(e) 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;

N/A – all of the Firm's clients are professional clients.

(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;

N/A – the Firm does not provide its services to retail clients.

(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 Commission Delegated Regulation (EU) to be inserted before publication [RTS 27];

Since 3 January 2018, the Firm has enhanced its review of execution quality across instrument classes, utilising internally developed and third party analytical tools and services provided by IHS Markit. The results of the analysis are reviewed by compliance and risk staff within the Firm. A wider selection of trades is now being tested for best execution purposes.

(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.

The Firm does not collect data from a separate consolidated tape provider

#### **Disclaimer**

***As the Firm is an AIFM, this RTS28 report is required to cover only "indirect" execution by the Firm in connection with its portfolio management and reception and transmission of orders activities. The Firm is not required to include in this report any "direct" order execution. The Firm mapped the various asset types that it trades on behalf of its clients into direct/indirect trading activity so that only what the Firm believes to be indirect trades are reported in this RTS28 report.***

***Please note the RTS 28's report has been prepared for Finisterre Capital LLP covering FY2020.***

***As of 1 Jan 2021, Finisterre Capital LLP no longer carries out any regulated activities as it has transferred its whole business to its affiliate Principal Global Investors (Europe) Limited (PGIE), which is ultimately controlled by the same persons as Finisterre Capital LLP. PGIE is registered in England and Wales (Company no. 03819986) and is regulated and authorised by the UK Financial Conduct Authority. FCA Reference number is 191120. As such, from 1 Jan 2021, Finisterre Capital is a trading name under PGIE.***