

**MiFID II - RTS 28 - Zerich Securities - Annual publication of information on the identity of execution venues
2021**

According to the article 27 of the Directive 2014/65/EU in financial instruments (MiFID II), Zerich Securities Limited as an investment firm makes public on an annual basis, for each class of financial instruments, the top five execution venues in terms of trading volumes and number of transactions categorized into Retail and Professional clients. This report relates to year 2021.

Professional					
Class of instrument	Equities – Shares & Depositary Receipts				
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 a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Freedom Finance Europe Ltd	100%	100%	0	100%	N/A
Retail					
Class of instrument	Equities – Shares & Depositary Receipts				
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 a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Freedom Finance Europe Ltd	100%	100%	99,30%	0,70%	N/A
Professional					
Class of instrument	Debt instruments				
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 a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Freedom Finance Europe Ltd	100%	100%	35,29%	64,71%	0
Retail					

Class of instrument	Debt instruments				
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 a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Freedom Finance Europe Ltd	87,95%	86,52%	76,47%	23,53%	100%

Retail

Class of instrument	Credit derivatives				
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 a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Freedom Finance Europe Ltd	100%	100%	100%	0%	0

Professional

Class of instrument	Currency derivatives				
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 a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Freedom Finance Europe Ltd	100%	100%	100%	0%	N/A

Retail

Class of instrument	Currency derivatives				
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 a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Freedom Finance Europe Ltd	0,05%	0,10%	96,83%	3,17%	N/A

Retail

Class of instrument	Structured finance instruments				
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 a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Freedom Finance Europe Ltd	100%	100%	100%	100%	N/A
Professional					
Class of instrument	Equity derivatives				
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 a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Freedom Finance Europe Ltd	100%	100%	100%	0%	N/A
Retail					
Class of instrument	Equity derivatives				
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 a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Freedom Finance Europe Ltd	1,08%	0,27%	95,90%	4,10%	N/A
Class of instrument	Securitized derivatives				
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 a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders

Freedom Finance Europe Ltd	100%	100%	100%	0%	N/A
Retail					
Class of instrument	Commodities derivatives and emission allowances derivatives				
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 a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Freedom Finance Europe Ltd	0,30%	3,14%	100%	0%	N/A
Class of instrument	Contracts for difference				
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 a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	
Freedom Finance Europe Ltd	N/A	N/A	N/A	N/A	N/A
Retail					
Class of instrument	Exchanged traded products (exchanged traded funds, exchanged traded notes and exchanged				
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 a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Freedom Finance Europe Ltd	100%	100%	99,62%	0,38%	N/A
Retail					
Class of instrument	Other instruments				
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	Proportion of orders executed as a percentage of total in that	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Freedom Finance Europe Ltd	100%	100%	100%	0%	0