



ANNUAL PUBLICATION OF TOP-FIVE EXECUTION VENUES AND THE
QUALITY OF EXECUTION OBTAINED FOR 2019

1. Introduction

Pursuant to the provisions of Article 28(6) of the Investment Services and Activities and Regulated Markets Law of 2017 (the “Law”) and Article 65(6) of the Commission Delegated Regulation (EU) 2017/565 (the “Regulation”), Eurivex Ltd (the “Company”) must summarize and make public, on an annual basis, for each class of financial instruments, the top five execution venues, in terms of trading volumes, where client orders were executed in the preceding year, as well as information on the quality of execution obtained.

2. Top-five execution venues for 2019

Equities - Retail clients

Class of Instrument		Equities			
Notification if <1 average trade per business day in the previous year		No			
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
					0%

Equities - Professional Clients

Class of Instrument		Equities			
Notification if <1 average trade per business day in the previous year		Yes			
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
					0%

Bonds - Retail clients

Class of Instrument		Bonds			
Notification if <1 average trade per business day in the previous year		No			
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
					0%

Bonds - Professional Clients

Class of Instrument		Bonds			
Notification if <1 average trade per business day in the previous year		Yes			
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
Eurobank Cyprus LEI: 5493004KSNEM4U7L8714	46.39%	11.11%			46.39%
Alfa Capital Holdings (Cyprus) Limited – LEI: 549300XTCMOUXC51WZ58	3.22%	22.22%			3.22%
Eurivex Ltd LEI: 213800D3UKCFEQXCQD09	50.39%	66.67%			50.39

3. Conclusions drawn from the detailed monitoring of the quality of execution obtained

The below are applicable for the financial instruments offered, that are, Equities and Bonds.

3.1. Execution factors

When executing clients' orders the Company takes into consideration the following execution factors:

- Price;
- Cost;
- Speed of execution;
- Likelihood of execution;
- Likelihood of settlement;
- Size of Order;
- Nature of Order; and
- Market Impact.

The Company acted as in accordance with its Order Execution Policy and executed trade orders received by taking into consideration all of the above factors giving, however, primary consideration to price and cost.

3.2. Close links / conflicts of interest / common ownership

The Company does not have any close links, conflicts of interests or common ownerships with any execution venues used to execute orders, except when executing OTC trades.

3.3. Arrangements with execution venues regarding inducements

There are no specific arrangements with any execution venue regarding payments made or received, discounts, remuneration, rebates, non-monetary benefits or other incentives that may influence the Company to use an execution venue over another.

3.4. Change of execution venues

During 2019 the Company had a contractual agreement with the below execution venues:

Ref. No.	Name of the Execution Venue	Country of Origin
1	Eurobank Cyprus	Cyprus
2	Alfa Capital Holdings (Cyprus) Limited	Cyprus

3.5. Order execution per client categorization

During 2019 the Company executed orders for professional clients and as such the Company's order execution was the same for all clients.

3.6. Precedence of other criteria over price and cost

As noted in Section 3.1. above, the company acted by giving prime consideration to price and cost when executing clients' orders.

3.7. Data analysis

The Company did not use any RTS 27 or RTS 28 reports produced by execution venues or brokers during 2019, as such reports were not available.

3.8. Usage of output of a consolidated tape provider

The Company has not used output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU ("MiFID II).