

## REPORT ON *TOP5* MAIN BROKERS AND RELATED INFORMATION

(period 01.01.2021. – 31.12.2021.)

In accordance with the Commission Delegated Regulation (EU) 2017/565 supplementing Directive 2014/65/EU of the European Parliament and of the Council as regards organisational requirements and operating conditions for investment firms and defined terms for the purposes of that Directive (hereinafter – Regulation 2017/565) and the Commission Delegated Regulation (EU) 2017/576 supplementing Directive 2014/65/EU of the European Parliament and of the Council with regard to regulatory technical standards for the annual publication by investment firms of information on the identity of execution venues and on the quality of execution (hereinafter – RTS 28), this report provides information on five main brokers (by trade volumes), which the joint stock company "Rietumu Banka" (hereinafter – the Bank) used in the calendar year 2021 with the purpose of execution of client orders, and the summary of execution quality.

Information is published in respect of every class of financial instruments.

If the Bank provides both the services of order execution, and reception and transmission of orders, two separate reports on these services are provided.

Information on top five execution venues is provided separately to private clients and to professional clients, allowing to qualitatively estimate flow of orders for such venues.

<b>Instrument category</b>	<b>Shares, depository receipts and exchange traded products (ETP)</b>				
<b>Client status</b>	<b>Private client</b>				
<b>Type of execution</b>	<b>Sent orders</b>				
<b>Statement, whether in the previous year on average &lt; 1 trade deal per business day</b>	<b>No</b>				
<b>Top five execution venues placed by trade volumes (in descending order)</b>	<b>Percentage of trade volume, expressed as a percentage of total amount in a respective category</b>	<b>Percentage of executed transactions expressed as a percentage from total number in a respective category</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of diverted orders</b>
Baader Bank Aktiengesellschaft – 529900JFOPPEDUR61H13	70.17%	40.55%	N/A	N/A	N/A
TP ICAP MARKETS LIMITED – 213800NMEZS3MD2IUP33	25.82%	56.24%	N/A	N/A	N/A
Joint stock company Raiffeisenbank – 2534006HF1L4YF10UD91	2.17%	0.74%	N/A	N/A	N/A
IBP MARKETS LTD – 213800Y7WLJLTZZ5I67	1.39%	2.32%	N/A	N/A	N/A
Pareto Securities AB – 549300446KJF7NHIXJ61	0.45%	0.15%	N/A	N/A	N/A

Instrument category	Shares, depository receipts and exchange traded products (ETP)				
Client status	Professional client				
Type of execution	Sent orders				
Statement, whether in the previous year on average < 1 trade deal per business day	No				
Top five execution venues placed by trade volumes (in descending order)	Percentage of trade volume, expressed as a percentage of total amount in a respective category	Percentage of executed transactions expressed as a percentage from total number in a respective category	Percentage of passive orders	Percentage of aggressive orders	Percentage of diverted orders
Baader Bank Aktiengesellschaft – 529900JFOPPEDUR61H13	58.89%	48.84%	N/A	N/A	N/A
TP ICAP MARKETS LIMITED – 213800NMEZS3MD2IUP33	37.32%	45.88%	N/A	N/A	N/A
IBP MARKETS LTD – 213800Y7WLJILTZZ5I67	3.79%	5.28%	N/A	N/A	N/A

### Order execution factors:

When sending an order for execution, the first factor that is considered is the possibility of executing the order. As the transactions were performed using the third-party services, factors that impacted the execution, such as, price, costs and speed, were under direct influence of brokers, not the Bank.

If the Bank executes orders on behalf of professional clients, it reasonably considers various execution factors during the execution according to execution criteria, where the price is not considered a priority factor and first of all the Bank evaluates the speed and accuracy of order execution, however, it does not mean that the order is not executed on terms that are most favourable to the client.

No different approach is applied to clients in respect of diverting the client orders to third party brokers, and all clients are offered equal conditions in accordance with the Excerpt from Client Categorisation, Appropriateness Assessment and Order Execution Policy, which is published on the Bank's website.

**Conflicts of interest** which may potentially occur, when executing or transferring for execution client orders in execution venues which are closely related to the Bank, are managed in accordance with the Bank's Excerpt from Conflicts of Interest Management Policy, when providing investment services, which is published on the Bank's website.

In the reporting period the Bank has neither granted nor received remunerations, discounts or non-material benefits from execution venues or brokers.

In order to compare and monitor the quality of execution of third-party brokers, the Bank used the publicly available market data.

Instrument category	Debt instruments				
Client status	Private clients				
Type of execution	Sent orders				
Statement, whether in the previous year on average < 1 trade deal per business day	Yes				
Top five execution venues placed by trade volumes (in descending order)	Percentage of trade volume, expressed as a percentage of total amount in a respective category	Percentage of executed transactions expressed as a percentage from total number in a respective category	Percentage of passive orders	Percentage of aggressive orders	Percentage of diverted orders
Joint stock company Raiffeisenbank – 2534006HF1L4YF10UD91	100%	100%	N/A	N/A	N/A

**Order execution factors:**

When sending an order for execution, the first factor that is considered is the possibility of executing the order. As the transactions were performed using the third-party services, factors that impacted the execution, such as, price, costs and speed, were under direct influence of brokers, not the Bank.

If the Bank executes orders on behalf of professional clients, it reasonably considers various execution factors during the execution according to execution criteria, where the price is not considered a priority factor and first of all the Bank evaluates the speed and accuracy of order execution, however, it does not mean that the order is not executed on terms that are most favourable to the client.

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<b>Instrument category</b>	Interest rate derivatives				
<b>Client status</b>	Private clients				
<b>Type of execution</b>	Sent orders				
<b>Statement, whether in the previous year on average &lt; 1 trade deal per business day</b>	Yes				
<b>Top five execution venues placed by trade volumes (in descending order)</b>	<b>Percentage of trade volume, expressed as a percentage of total amount in a respective category</b>	<b>Percentage of executed transactions expressed as a percentage from total number in a respective category</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of diverted orders</b>
STRAITS FINANCIAL LLC – 549300H8JV00CEXMYU13	100%	100%	N/A	N/A	N/A

**Order execution factors:**

In the reporting period the Bank has executed the client orders as an agent, by sending them to other brokers.

The first factor that is considered for execution of the sent orders is the possibility of executing the order. As the transactions were performed using the third-party services, factors that impacted the execution, such as, price, costs and speed, were under direct influence of brokers, not the Bank.

Business partners were chosen, by evaluating their ability to ensure high-quality execution services, taking into account the respective execution factors of the Bank. If the Bank executes orders on behalf of professional clients, it reasonably considers various execution factors during the execution according to execution criteria, where the price is not considered a priority factor and first of all the Bank evaluates the speed and accuracy of order execution, however, it does not mean that the order is not executed on terms that are most favourable to the client.

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In order to compare and monitor the quality of execution of third-party brokers, the Bank used the publicly available market data.

<b>Instrument category</b>	Currency derivatives				
<b>Client status</b>	Private clients				
<b>Type of execution</b>	Sent orders				
<b>Statement, whether in the previous year on average &lt; 1 trade deal per business day</b>	Yes				
<b>Top five execution venues placed by trade volumes (in descending order)</b>	<b>Percentage of trade volume, expressed as a percentage of total amount in a respective category</b>	<b>Percentage of executed transactions expressed as a percentage from total number in a respective category</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of diverted orders</b>
STRAITS FINANCIAL LLC – 549300H8JV00CEXMYU13	100%	100%	N/A	N/A	N/A

<b>Instrument category</b>	Currency derivatives				
<b>Client status</b>	Professional clients				
<b>Type of execution</b>	Sent orders				
<b>Statement, whether in the previous year on average &lt; 1 trade deal per business day</b>	Yes				
<b>Top five execution venues placed by trade volumes (in descending order)</b>	<b>Percentage of trade volume, expressed as a percentage of total amount in a respective category</b>	<b>Percentage of executed transactions expressed as a percentage from total number in a respective category</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of diverted orders</b>
STRAITS FINANCIAL LLC – 549300H8JV00CEXMYU13	100%	100%	N/A	N/A	N/A

**Order execution factors:**

The first factor that is considered for execution of the sent orders is the possibility of executing the order. As the transactions were performed using the third-party services, factors that impacted the execution, such as, price, costs and speed, were under direct influence of brokers, not the Bank.

Business partners were chosen, by evaluating their ability to ensure high-quality execution services, taking into account the respective execution factors of the Bank.

If the Bank executes orders on behalf of professional clients, it reasonably considers various execution factors during the execution according to execution criteria, where the price is not considered a priority factor and first of all the Bank evaluates the speed and accuracy of order execution, however, it does not mean that the order is not executed on terms that are most favourable to the client.

No different approach is applied to clients in respect of diverting the client orders to third-party brokers, and all clients are offered equal conditions in accordance with the Excerpt from Client Categorisation, Appropriateness Assessment and Order Execution Policy, which is published on the Bank's website.

**Conflicts of interest** which may potentially occur, when executing or transferring for execution client orders in execution venues which are closely related to the Bank, are managed in accordance with the Bank's Excerpt from Conflicts of Interest Management Policy, when providing investment services, which is published on the Bank's website.

In the reporting period the Bank has neither granted nor received remunerations, discounts or non-material benefits from execution venues or brokers. In order to compare and monitor the quality of execution of third-party brokers, the Bank used the publicly available market data.

<b>Instrument category</b>	<b>Derivative capital instruments</b>				
<b>Client status</b>	<b>Private clients</b>				
<b>Type of execution</b>	<b>Sent orders</b>				
<b>Statement, whether in the previous year on average &lt; 1 trade deal per business day</b>	<b>Yes</b>				
<b>Top five execution venues placed by trade volumes (in descending order)</b>	<b>Percentage of trade volume, expressed as a percentage of total amount in a respective category</b>	<b>Percentage of executed transactions expressed as a percentage from total number in a respective category</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of diverted orders</b>
Baader Bank Aktiengesellschaft – 529900JFOPPEDUR61H13	67.65%	0.91%	N/A	N/A	N/A
STRAITS FINANCIAL LLC – 549300H8JV00CEXMYU13	32.35%	99.09%			

<b>Instrument category</b>	<b>Derivative capital instruments</b>				
<b>Client status</b>	<b>Professional clients</b>				
<b>Type of execution</b>	<b>Sent orders</b>				
<b>Statement, whether in the previous year on average &lt; 1 trade deal per business day</b>	<b>Yes</b>				
<b>Top five execution venues placed by trade volumes (in descending order)</b>	<b>Percentage of trade volume, expressed as a percentage of total amount in a respective category</b>	<b>Percentage of executed transactions expressed as a percentage from total number in a respective category</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of diverted orders</b>
Baader Bank Aktiengesellschaft – 529900JFOPPEDUR61H13	57.89%	1.33%	N/A	N/A	N/A
STRAITS FINANCIAL LLC – 549300H8JV00CEXMYU13	42.11%	98.67%	N/A	N/A	N/A

**Order execution factors:**

In the reporting period the Bank has executed the client orders as an agent, by sending them to other brokers.

The first factor that is considered for execution of the sent orders is the possibility of executing the order. As the transactions were performed using the third-party services, factors that impacted the execution, such as, price, costs and speed, were under direct influence of brokers, not the Bank.

Business partners were chosen, by evaluating their ability to ensure high-quality execution services, taking into account the respective execution factors of the Bank.

If the Bank executes orders on behalf of professional clients, it reasonably considers various execution factors during the execution according to execution criteria, where the price is not considered a priority factor and first of all the Bank evaluates the speed and accuracy of order execution, however, it does not mean that the order is not executed on terms that are most favourable to the client.

No different approach is applied to clients in respect of diverting the client orders to third-party brokers, and all clients are offered equal conditions in accordance with the Excerpt from Client Categorisation, Appropriateness Assessment and Order Execution Policy, which is published on the Bank's website.

**Conflicts of interest** which may potentially occur, when executing or transferring for execution client orders in execution venues which are closely related to the Bank, are managed in accordance with the Bank's Excerpt from Conflicts of Interest Management Policy, when providing investment services, which is published on the Bank's website.

In the reporting period the Bank has neither granted nor received remunerations, discounts or non-material benefits from execution venues or brokers. In order to compare and monitor the quality of execution of third-party brokers, the Bank used the publicly available market data.

<b>Instrument category</b>	Commodity derivatives				
<b>Client status</b>	Private clients				
<b>Type of execution</b>	Sent orders				
<b>Statement, whether in the previous year on average &lt; 1 trade deal per business day</b>	No				
<b>Top five execution venues placed by trade volumes (in descending order)</b>	<b>Percentage of trade volume, expressed as a percentage of total amount in a respective category</b>	<b>Percentage of executed transactions expressed as a percentage from total number in a respective category</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of diverted orders</b>
Straits Financial LLC – 549300H8JV00CEXMYU13	100%	100%	N/A	N/A	N/A

<b>Instrument category</b>	Commodity derivatives				
<b>Client status</b>	Professional clients				
<b>Type of execution</b>	Sent orders				
<b>Statement, whether in the previous year on average &lt; 1 trade deal per business day</b>	Yes				
<b>Top five execution venues placed by trade volumes (in descending order)</b>	<b>Percentage of trade volume, expressed as a percentage of total amount in a respective category</b>	<b>Percentage of executed transactions expressed as a percentage from total number in a respective category</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of diverted orders</b>
Straits Financial LLC – 549300H8JV00CEXMYU13	100%	100%	N/A	N/A	N/A

**Order execution factors:**

In the reporting period the Bank has executed the client orders as an agent, by sending them to other brokers.

The first factor that is considered for execution of the sent orders is the possibility of executing the order. As the transactions were performed using the third-party services, factors that impacted the execution, such as, price, costs and speed, were under direct influence of brokers, not the Bank.

If the Bank executes orders on behalf of professional clients, it reasonably considers various execution factors during the execution according to execution criteria, where the price is not considered a priority factor and first of all the Bank evaluates the speed and accuracy of order execution, however, it does not mean that the order is not executed on terms that are most favourable to the client.

No different approach is applied to clients in respect of diverting the client orders to third-party brokers, and all clients are offered equal conditions in accordance with the Excerpt from Client Categorisation, Appropriateness Assessment and Order Execution Policy, which is published on the Bank's website.

**Conflicts of interest** which may potentially occur, when executing or transferring for execution client orders in execution venues which are closely related to the Bank, are managed in accordance with the Bank's Excerpt from Conflicts of Interest Management Policy, when providing investment services, which is published on the Bank's website.

In the reporting period the Bank has neither granted nor received remunerations, discounts or non-material benefits from execution venues or brokers. In order to compare and monitor the quality of execution of third-party brokers, the Bank used the publicly available market data.

Instrument category	Price fluctuation contracts (FOREX)				
Client status	Private clients				
Type of execution	Sent orders				
Statement, whether in the previous year on average < 1 trade deal per business day	No				
Top five execution venues placed by trade volumes (in descending order)	Percentage of trade volume, expressed as a percentage of total amount in a respective category	Percentage of executed transactions expressed as a percentage from total number in a respective category	Percentage of passive orders	Percentage of aggressive orders	Percentage of diverted orders
Sucden Financial Limited – 213800W2XOTEIWVRS823	100%	100%	0.00%	0.00%	0.00%

**Order execution factors:**

In the reporting period the Bank has executed the client orders as an agent, with Sucden Financial Limited. The Bank has evaluated various factors for commodity orders, taking into account the possibility of order execution as the first factor. As the transactions were performed using the third-party services, factors that impacted the execution, such as, price, costs and speed, were under direct influence of brokers, not the Bank.

Business partners were chosen, by evaluating their ability to ensure high-quality execution services, taking into account the respective execution factors of the Bank. No different approach is applied to clients in respect of diverting the client orders to third-party brokers, and all clients are offered equal conditions in accordance with the Excerpt from Client Categorisation, Appropriateness Assessment and Order Execution Policy, which is published on the Bank's website.

**Conflicts of interest** which may potentially occur, when executing or transferring for execution client orders in execution venues which are closely related to the Bank, are managed in accordance with the Bank's Excerpt from Conflicts of Interest Management Policy, when providing investment services, which is published on the Bank's website.

In the reporting period the Bank has neither granted nor received remunerations, discounts or non-material benefits from execution venues or brokers. In order to compare and monitor the quality of execution of third-party brokers, the Bank used the publicly available market data.