

As part of the requirements of the Directive 2014/65/EU on markets in financial instruments (“MiFID II”), specifically in respect to Commission Delegated Regulation 2017/576 which prescribes regulatory technical standards for the annual publication by investment firms of information on the identity of execution venues and on the quality of execution (“RTS 28”), investment managers such as Kairos Investment Management Limited (the “Firm” or “KIML”) are required, in respect to their MiFID II business, to publish information on the top five execution venues in terms of trading volumes where they executed client orders in the preceding year and information on the quality of execution obtained for each class of financial instrument. Under RTS 28, relevant reporting is in a prescribed format on an annual basis within deadlines set under the regulations.

KIML gives appropriate relative importance to the main execution factors including price, cost, speed, liquidity of instrument being traded and likelihood of execution and settlement when assessing the quality of execution.

The execution factors are set out in the Firm’s Best Execution Policy. Execution factors may consist of any considerations relevant to the order and the importance of each factor is subjective to each trade unless otherwise specified by the client. Factored in to price will be transactional costs, however, given that price tends to be the key driver of total cost, price has generally taken precedence over transactional costs. The speed and likelihood of execution also plays a role, albeit smaller relative to the aforementioned factors.

- There are no close links, conflicts of interests or common ownerships with respect to any execution venues used to execute orders;
- Other than standard commissions and other charges paid by the Firm, and with the exception of the Research Payment Account maintained by the Firm, there are no specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received;
- The Firm’s list of execution venues for electronic market access and the Firm’s approved broker list are maintained in the firm’s best execution policy which can be provided upon reasonable request.
- Order execution does not differ according to client categorisation; and
- The Firm monitors best execution internally. This gives the firm the capability to review trades both periodically and on an ad-hoc basis to assess whether there are any common themes developing with specific venues/brokers. The Firm uses its own proprietary systems in addition to periodic reports (such as trade cost analysis reports received from Trade informatics and KIML’s electronic market access brokers) to assess the quality of execution.

By Asset Class						
Notification if <1 average trade per business day in the previous year: N						
Asset Class	Top five venues or brokers ranked in terms of trading volumes (desc. 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
Equities - Tick Size Liquidity Bands 1 and 2		100.00	100.00	N/A	N/A	N/A
	UBS	40.37	39.29	N/A	N/A	N/A
	Morgan Stanley	22.98	18.64	N/A	N/A	N/A
	Goldman Sachs	8.00	7.88	N/A	N/A	N/A
	Credit Suisse	5.72	8.26	N/A	N/A	N/A
	Yapi Kredit	5.53	3.94	N/A	N/A	N/A

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Equities - Tick Size Liquidity Bands 3 and 4		100.00	100.00	N/A	N/A	N/A
	Morgan Stanley	26.40	17.85	N/A	N/A	N/A
	UBS	13.76	13.56	N/A	N/A	N/A
	Bank of America Merrill Lynch	9.65	11.26	N/A	N/A	N/A
	JP Morgan	7.81	6.67	N/A	N/A	N/A
	Goldman Sachs	7.66	10.44	N/A	N/A	N/A

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Equities - Tick Size Liquidity Bands 5 and 6		100.00	100.00	N/A	N/A	N/A	N/A
	Morgan Stanley	31.03	18.26	N/A	N/A	N/A	N/A
	Bank of America Merrill Lynch	9.94	9.31	N/A	N/A	N/A	N/A
	Goldman Sachs	9.42	14.44	N/A	N/A	N/A	N/A
	UBS	8.48	5.97	N/A	N/A	N/A	N/A
	Deutsche Bank	7.51	6.68	N/A	N/A	N/A	N/A

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Bonds		100.00	100.00	N/A	N/A	N/A	N/A
	Bank of America Merrill Lynch	14.56	11.81	N/A	N/A	N/A	N/A
	JP Morgan	11.16	8.41	N/A	N/A	N/A	N/A
	Citigroup	7.40	5.99	N/A	N/A	N/A	N/A
	MPS Capital	6.94	6.47	N/A	N/A	N/A	N/A
	HSBC	6.76	5.83	N/A	N/A	N/A	N/A

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Options		100.00	100.00	N/A	N/A	N/A	N/A
	Mariana Capital	50.26	28.00	N/A	N/A	N/A	N/A
	Goldman Sachs	22.92	18.00	N/A	N/A	N/A	N/A
	JP Morgan	9.41	17.00	N/A	N/A	N/A	N/A
	Morgan Stanley	8.32	9.00	N/A	N/A	N/A	N/A
	Exane BNP Paribas	3.65	3.00	N/A	N/A	N/A	N/A

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CDS		100.00	100.00	N/A	N/A	N/A	N/A
	Morgan Stanley	100.00	100.00	N/A	N/A	N/A	N/A

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CFD		100.00	100.00	N/A	N/A	N/A	N/A
	Morgan Stanley	26.42	17.31	N/A	N/A	N/A	N/A
	Goldman Sachs	16.43	21.30	N/A	N/A	N/A	N/A
	Bank of America Merrill Lynch	10.25	9.11	N/A	N/A	N/A	N/A
	Exane BNP Paribas	6.72	7.91	N/A	N/A	N/A	N/A
	Kepler Capital Markets SA	5.26	6.71	N/A	N/A	N/A	N/A

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Currency		100.00	100.00	N/A	N/A	N/A
	BNP Paribas	97.07	40.01	N/A	N/A	N/A
	Morgan Stanley	2.93	59.99	N/A	N/A	N/A

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Commodity Futures/Forwards		100.00	100.00	N/A	N/A	N/A
	BNP Paribas	71.28	33.16	N/A	N/A	N/A
	Morgan Stanley	25.34	57.31	N/A	N/A	N/A
	JP Morgan	3.21	9.43	N/A	N/A	N/A
	Mariana Capital	0.17	0.10	N/A	N/A	N/A

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Index		100.00	100.00	N/A	N/A	N/A
	Morgan Stanley	100.00	100.00	N/A	N/A	N/A

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Fund		100.00	100.00	N/A	N/A	N/A
	BNP Paribas	97.17	97.06	N/A	N/A	N/A
	Banca Patrimoni	2.83	2.94	N/A	N/A	N/A

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Fund of Funds		100.00	100.00	N/A	N/A	N/A
	Julius Baer Lugano	49.19	8.23	N/A	N/A	N/A
	BNP Paribas	34.53	61.13	N/A	N/A	N/A
	Caceis Bank Luxembourg	13.66	19.52	N/A	N/A	N/A
	SuMi Trust UK	2.58	10.32	N/A	N/A	N/A
	SSqA Ireland	0.05	0.81	N/A	N/A	N/A