

**NON PROFESSIONAL CLIENTS**

Class of Instrument	Equities — Shares & Depository Receipts				
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
XBUL/ BSE SOFIA	32,86%	4,46%	99,47%	0,53%	0%
XETR/ Xetra Deutsche Borse	22,42%	2,58%	91,74%	8,26%	0%
XIST/ Istanbul Stock Exchange	15,69%	76,48%	100%	0,00%	0%
ARCX/ NYSE - ARCA	7,21%	14,56%	93,81%	6,19%	0%
XAMS/ Euronext Amsterdam	7,10%	1,92%	100,00%	0%	0%

Class of Instrument	Debt instruments - bonds and money markets instruments				
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
XLUX/ Luxembourg Stock Exchange	54,70%	20,00%	100,00%	0,00%	0%
Interactive/ Interactive	35,45%	20,00%	100,00%	0,00%	0%
XDUB/ Irish Stock Exchange	8,84%	20,00%	100,00%	0,00%	0%
/ Borse Stuttgart	0,98%	20,00%	100,00%	0,00%	0%
XBUL/ BSE SOFIA	0,03%	20,00%	100,00%	0,00%	0%

**PROFESSIONAL CLIENTS**

Class of Instrument	Equities — Shares & Depository Receipts				
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
XBUL/ BSE SOFIA	27,76%	3,44%	98,53%	1,47%	0%
XIST/ Istanbul Stock Exchange	26,90%	86,93%	99,96%	0,04%	0%
XNAS/ Nasdaq	13,97%	7,40%	79,80%	20,20%	0%
XETR/ Xetra Deutsche Borse	13,86%	2,18%	82,78%	17,22%	0%
XCYS/ Cyprus Stock Exchange	6,53%	0,05%	100,00%	0%	0%

Class of Instrument	Debt instruments - bonds and money markets instruments				
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
XWAR/ Warsaw Stock Exchange-Poland (EU)	54,71%	53,13%	100,00%	0,00%	0%
Interactive/ Interactive	40,86%	18,75%	100,00%	0,00%	0%
XBUL/ БФБ София	4,43%	28,12%	100,00%	0,00%	0%

Class of Instrument	Derivatives
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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
Interactive/ Interactive	100,00%	100,00%	95,63%	4,37%	0%

Class of Instrument	Derivatives				
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
Interactive/ Interactive	100,00%	100,00%	93,66%	6,34%	0%

## **SUMMARY OF THE QUALITY OF EXECUTION OF CLIENTS ORDERS FOR ALL TYPES OF FINANCIAL INSTRUMENTS**

This document is a summary of the information and conclusions that investment intermediary IP Intercapital Markets AD makes from its detailed monitoring of the quality of execution of all client orders for transactions in financial instruments for 2019, in accordance with the requirements of Regulation (EU) 2017/576 of the Commission of 8 June 2016.

### ***1. 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 evaluation of the best execution of the client's orders is not only related to the determination of the best price for the client, but also to all the other factors below. If a transaction is found that was not been concluded at the best possible price available on the market at the time of its conclusion, this does not imply a breach of the requirements for best execution of the client's order. IP Intercapital Markets AD has fulfilled its obligation to act in the best interest of the client if it has made reasonable efforts to establish the best price for the client according to the following factors:

- terms of the order (price, quality, validity);
- amount of costs;
- time for the execution of the order;
- likelihood of execution of the deal, as well as its settlement;
- volume of the order, its characteristics or other aspects which are particularly important for execution of the order.

The IB has satisfied its obligation to act in the clients' best interest in order to obtain the best possible result for them when following specific instructions from the client at the execution of the order or transfers the execution of the order to a third party.

The criteria for determining the weight (the relative importance) of all the above factors used by the IB at the execution of clients' orders shall be:

- characteristics of the client (professional or nonprofessional);
- characteristics of the order;
- the characteristics of financial instruments that are the subject of that order;
- the characteristics of the execution venues to which that order can be directed;

The weight of every factor and the methods for its determination in respect of orders by professional and nonprofessional clients shall be specified as follows:

- For the nonprofessional clients, the factors above are ranked respectively from most to least relative weight. The price is the most important element of the assessment for the best realization.

- For the professional clients the factors above are ranked respectively from most to least relative weight. In most cases, the price is the most important element of the assessment for the best realization. In some circumstances the IB may decide (depending on the specifics of the customer, the order and the instrument or the market) to adopt a different sequence of the factors of relative weight.

**2. A description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders.**

IP Intercapital Markets AD has no close links, conflicts of interest and common ownership in any of the venues or executing broker.

**3. Specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received.**

IP Intercapital Markets AD has no special arrangements with the venues or executing broker regarding the payments made, received, received, discounted or received in cash.

**4. 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.**

No new factors have emerged in the period leading to a change in the list of venues, including in the policy of IP Intercapital Markets AD to work in the best interest and to achieve the best customer results.

**6. 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.**

All clients of Intercapital Markets AD are treated equally, regardless of their categorization.

**7. 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.**

IP Intercapital Markets AD did not use any other criterion for determining the best result for the reporting period, which was preferred over the immediate price of the instrument and the cost of executing the order.

**8. How IP Intercapital Markets AD has used any data or tools relating to the quality of execution, including any data published under Delegated Regulation (EU) 2017/575.**

IP Intercapital Markets AD used its own sources of information as well as external and independent market data.

**9. Where applicable, an explanation of how IP Intercapital Markets AD has used output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU.**

IP Intercapital Markets AD does not use the services of a consolidated data provider.

**February 2020**