

## **RTS 27**

**Data to be published by Execution Venues on the quality of execution of transactions**

**In accordance with Regulation EU 2017/575**

**I Quarter 2020**

**Dated June 2020**

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## 1. Scope of RTS 27 data report

**Zemblanco Investments Ltd** (“the Company”) is authorized and regulated by the Cyprus Securities and Exchange Commission (“CySEC”) as a Cyprus Investment Firm (CIF) to offer Investment and Ancillary Services and Activities. It operates under the Investment Services and Activities and Regulated Markets Law of 2017 L.87(I)/2017, as subsequently amended or replaced from time to time (“the Law”), with CIF license number 277/15.

The Company during the Q1 of 2020 has acted as execution venue for particular amount of its clients orders traded OTC, hence in order to comply with Directive 2014/65/EU and its supplementing Regulation (EU) 2017/575, the Company hereby publishes a quarterly report for the months January, February and March 2020, that contains data of the execution quality (i.e. details about price, costs and likelihood of execution for every individual financial instrument offered) based on the relevant regulatory requirements.

**Directive 2014/65/EU** of the European Parliament on markets in financial instruments and **Regulation (EU) 2017/575** supplementing Directive 2014/65/EU set regulatory technical standards concerning the data to be published by execution venues on the quality of execution of financial instruments.



**Table 1 - identification information to be published as referred to in Article 3(1) – type of execution venue**

<b>Field</b>	<b>Content to be reported</b>		
<b>Venue</b>	Zemblanco Investments Ltd	Legal Entity Identifier (LEI) 21380044MJNCYKRR2X92	
<b>Country of Competent Authority</b>	Cyprus		
<b>Market Segment</b>	N/A	XOFF	
<b>Date of the trading day</b>	2020-03-12		
<b>Outages</b>	Nature N/A	Number N/A	Average duration N/A
<b>Scheduled Auction</b>	Nature N/A	Number N/A	Average duration N/A
<b>Failed Transactions</b>	0	0	0

**Table 2 - identification information to be published as referred to in Article 3(2) – type of financial instrument**

<b>Financial Instrument</b>	<b>Name</b>	<b>ISIN</b>
<b>Equity/Shares</b>	M.Video, RUB	RU000A0JPGA0
<b>Instrument classification (CFI code)</b>	ESVXFR	
<b>Currency</b>	RUB	

**Table 3 - price information to be published as referred to in Article 4 point (a)**

Date of the trading day		2020-03-12		First transaction after time T (if no transactions within first two minutes after time T)						
Time (T)	Size Range	All trades executed within first two minutes after time T		Price	Time of execution	Transaction size	Trading System	Trading Mode	Trading platform	best bid and offer or suitable reference price at time of execution
		Simple average executed price (excluding commissions and accrued interest)	Total value executed							
09.30.00	1									
	2									
	3									
11.30.00	1									
	2									
	3									
13.30.00	1									
	2									
	3									
15.30.00	1			435,00	16:40:24	5198250,00	OTC	N/A	N/A	N/A
	2									
	3									

**Table 4 - price information to be published as referred to in Article 4 point (b)**

<b>Date of the trading day</b>	2020-03-12
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SIMPLE AVERAGE TRANSACTION PRICE	N/A
VOLUME-WEIGHTED TRANSACTION PRICE	N/A
HIGHEST EXECUTED PRICE	N/A
LOWEST EXECUTED PRICE	N/A

**Table 5 - costs information to be published as referred to in Article 5**

Information required under Article 5(a) to (d)	Description	
Link to a website or other source where further information on costs is available	<a href="https://zemblanco.com/about-us/our-company/">https://zemblanco.com/about-us/our-company/</a>	
Total value of all rebates, discounts, or other payments offered (as % of total traded value during the reporting period)	0%	When the company acts as execution venue for its OTC executed trades, it does not offer any kind of monetary or non-monetary payments or rebates to the clients, nor discounts/benefits
Total value of all costs (as a % of total traded value during the reporting period volume)	0,01%	Components of the cost of the execution that the Company, acting as execution venue, include execution fees according to brokerage agreement with clients, clearing and settlement fees paid to the third parties involved in the execution, as well as currency conversion related fees



**Table 6 – likelihood of execution information to be published as referred to in Article 6**

<b>Date of the trading day</b>	2020-03-12
Number of orders or request for quotes received	1
Number of transactions executed	1
Total value of transactions executed	5198250,00
Number of orders or request for quotes received cancelled or withdrawn	0
Number of orders or request for quotes received modified	0
Median transaction size	N/A
Median size of all orders or requests for quote	N/A
Number of designated market makers	0

**Table 1 - identification information to be published as referred to in Article 3(1) – type of execution venue**

Field	Content to be reported		
<b>Venue</b>	Zemblanco Investments Ltd	Legal Entity Identifier (LEI) 21380044MJNCYKRR2X92	
<b>Country of Competent Authority</b>	Cyprus		
<b>Market Segment</b>	N/A	XOFF	
<b>Date of the trading day</b>	2020-03-27		
<b>Outages</b>	Nature N/A	Number N/A	Average duration N/A
<b>Scheduled Auction</b>	Nature N/A	Number N/A	Average duration N/A
<b>Failed Transactions</b>	0	0	0

**Table 2 - identification information to be published as referred to in Article 3(2) – type of financial instrument**

<b>Financial Instrument</b>	<b>Name</b>	<b>ISIN</b>
<b>Debt Instruments/Bond</b>	REDCAR TRADING LLP 24	AT0000A284R6
<b>Instrument classification (CFI code)</b>	DCFUGB	
<b>Currency</b>	EUR	



**Table 3 - price information to be published as referred to in Article 4 point (a)**

Date of the trading day		2020-03-27		First transaction after time T (if no transactions within first two minutes after time T)						
Size Range		All trades executed within first two minutes after time T								
Time (T)		Simple average executed price (excluding commissions and accrued interest)	Total value executed	Price	Time of execution	Transaction size	Trading System	Trading Mode	Trading platform	best bid and offer or suitable reference price at time of execution
09.30.00	1									
	2									
	3									
11.30.00	1									
	2									
	3									
13.30.00	1									
	2									
	3									
15.30.00	1			10125,00	18:27:12	2569461,67	OTC	N/A	N/A	N/A
	2									
	3									

**Table 4 - price information to be published as referred to in Article 4 point (b)**

<b>Date of the trading day</b>	2020-03-27
SIMPLE AVERAGE TRANSACTION PRICE	10125,00
VOLUME-WEIGHTED TRANSACTION PRICE	10125,00
HIGHEST EXECUTED PRICE	N/A
LOWEST EXECUTED PRICE	N/A

**Table 5 - costs information to be published as referred to in Article 5**

Information required under Article 5(a) to (d)	Description	
Link to a website or other source where further information on costs is available	<a href="https://zemblanco.com/about-us/our-company/">https://zemblanco.com/about-us/our-company/</a>	
Total value of all rebates, discounts, or other payments offered (as % of total traded value during the reporting period)	0%	When the company acts as execution venue for its OTC executed trades, it does not offer any kind of monetary or non-monetary payments or rebates to the clients, nor discounts/benefits
Total value of all costs (as a % of total traded value during the reporting period volume)	0,01%	Components of the cost of the execution that the Company, acting as execution venue, include execution fees according to brokerage agreement with clients, clearing and settlement fees paid to the third parties involved in the execution, as well as currency conversion related fees

**Table 6 – likelihood of execution information to be published as referred to in Article 6**

Number of orders or request for quotes received	2
Number of transactions executed	2
Total value of transactions executed	5138923,34
Number of orders or request for quotes received cancelled or withdrawn	0
Number of orders or request for quotes received modified	0
Median transaction size	2569461,67
Median size of all orders or requests for quote	2569461,67
Number of designated market makers	0

**Table 1 - identification information to be published as referred to in Article 3(1) – type of execution venue**

Field	Content to be reported		
<b>Venue</b>	Zemblanco Investments Ltd	Legal Entity Identifier (LEI) 21380044MJNCYKRR2X92	
<b>Country of Competent Authority</b>	Cyprus		
<b>Market Segment</b>	N/A	XOFF	
<b>Date of the trading day</b>	2020-03-27		
<b>Outages</b>	Nature N/A	Number N/A	Average duration N/A
<b>Scheduled Auction</b>	Nature N/A	Number N/A	Average duration N/A
<b>Failed Transactions</b>	0	0	0



**Table 2 - identification information to be published as referred to in Article 3(2) – type of financial instrument**

<b>Financial Instrument</b>	<b>Name</b>	<b>ISIN</b>
<b>Debt Instruments/Bond</b>	Intellect Lending Group Ltd 9.0 08/12/25, EUR	XS1332333696
<b>Instrument classification (CFI code)</b>	DBFNBR	
<b>Currency</b>	EUR	



**Table 3 - price information to be published as referred to in Article 4 point (a)**

Date of the trading day		2020-03-27		First transaction after time T (if no transactions within first two minutes after time T)						
Time (T)	Size Range	All trades executed within first two minutes after time T		Price	Time of execution	Transaction size	Trading System	Trading Mode	Trading platform	best bid and offer or suitable reference price at time of execution
		Simple average executed price (excluding commissions and accrued interest)	Total value executed							
09.30.00	1									
	2									
	3									
11.30.00	1									
	2									
	3									
13.30.00	1									
	2									
	3									
15.30.00	1			103,5	18:30:45	1135691,21	OTC	N/A	N/A	N/A
	2									
	3									

**Table 4 - price information to be published as referred to in Article 4 point (b)**

<b>Date of the trading day</b>	2020-03-27
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SIMPLE AVERAGE TRANSACTION PRICE	103,5
VOLUME-WEIGHTED TRANSACTION PRICE	103,5
HIGHEST EXECUTED PRICE	N/A
LOWEST EXECUTED PRICE	N/A

**Table 5 - costs information to be published as referred to in Article 5**

Information required under Article 5(a) to (d)	Description	
Link to a website or other source where further information on costs is available	<a href="https://zemblanco.com/about-us/our-company/">https://zemblanco.com/about-us/our-company/</a>	
Total value of all rebates, discounts, or other payments offered (as % of total traded value during the reporting period)	0%	When the company acts as execution venue for its OTC executed trades, it does not offer any kind of monetary or non-monetary payments or rebates to the clients, nor discounts/benefits
Total value of all costs (as a % of total traded value during the reporting period volume)	0,25%	Components of the cost of the execution that the Company, acting as execution venue, include execution fees according to brokerage agreement with clients, clearing and settlement fees paid to the third parties involved in the execution, as well as currency conversion related fees

**Table 6 – likelihood of execution information to be published as referred to in Article 6**

Number of orders or request for quotes received	2
Number of transactions executed	2
Total value of transactions executed	2271382,42
Number of orders or request for quotes received cancelled or withdrawn	0
Number of orders or request for quotes received modified	0
Median transaction size	1135691,21
Median size of all orders or requests for quote	1135691,21
Number of designated market makers	0

**Table 1 - identification information to be published as referred to in Article 3(1) – type of execution venue**

<b>Field</b>	<b>Content to be reported</b>		
<b>Venue</b>	Zemblanco Investments Ltd	Legal Entity Identifier (LEI) 21380044MJNCYKRR2X92	
<b>Country of Competent Authority</b>	Cyprus		
<b>Market Segment</b>	N/A	XOFF	
<b>Date of the trading day</b>	2020-03-27		
<b>Outages</b>	Nature N/A	Number N/A	Average duration N/A
<b>Scheduled Auction</b>	Nature N/A	Number N/A	Average duration N/A
<b>Failed Transactions</b>	0	0	0

**Table 2 - identification information to be published as referred to in Article 3(2) – type of financial instrument**

<b>Financial Instrument</b>	<b>Name</b>	<b>ISIN</b>
<b>Debt Instruments/Bond</b>	Promstar KFT 7.0 16/03/27, EUR	XS1574800220
<b>Instrument classification (CFI code)</b>	DBFNBR	
<b>Currency</b>	EUR	

**Table 3 - price information to be published as referred to in Article 4 point (a)**

Date of the trading day		2020-03-27		First transaction after time T (if no transactions within first two minutes after time T)						
Time (T)	Size Range	All trades executed within first two minutes after time T		Price	Time of execution	Transaction size	Trading System	Trading Mode	Trading platform	best bid and offer or suitable reference price at time of execution
		Simple average executed price (excluding commissions and accrued interest)	Total value executed							
09.30.00	1									
	2									
	3									
11.30.00	1									
	2									
	3									
13.30.00	1									
	2									
	3									
15.30.00	1			1016,00	18:32:16	1344713,33	OTC	N/A	N/A	N/A
	2									
	3									



**Table 4 - price information to be published as referred to in Article 4 point (b)**

<b>Date of the trading day</b>	2020-03-27
SIMPLE AVERAGE TRANSACTION PRICE	1016,00
VOLUME-WEIGHTED TRANSACTION PRICE	1016,00
HIGHEST EXECUTED PRICE	N/A
LOWEST EXECUTED PRICE	N/A

**Table 5 - costs information to be published as referred to in Article 5**

Information required under Article 5(a) to (d)	Description	
Link to a website or other source where further information on costs is available	<a href="https://zemblanco.com/about-us/our-company/">https://zemblanco.com/about-us/our-company/</a>	
Total value of all rebates, discounts, or other payments offered (as % of total traded value during the reporting period)	0%	When the company acts as execution venue for its OTC executed trades, it does not offer any kind of monetary or non-monetary payments or rebates to the clients, nor discounts/benefits
Total value of all costs (as a % of total traded value during the reporting period volume)	0,01%	Components of the cost of the execution that the Company, acting as execution venue, include execution fees according to brokerage agreement with clients, clearing and settlement fees paid to the third parties involved in the execution, as well as currency conversion related fees

**Table 6 – likelihood of execution information to be published as referred to in Article 6**

Number of orders or request for quotes received	2
Number of transactions executed	2
Total value of transactions executed	2689426,66
Number of orders or request for quotes received cancelled or withdrawn	0
Number of orders or request for quotes received modified	0
Median transaction size	1344713,33
Median size of all orders or requests for quote	1344713,33
Number of designated market makers	0