

RTS 27

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

In accordance with Regulation EU 2017/575

III Quarter 2021

Dated December 2021

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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 Q3 of 2021 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 quarterly report for the months July, August and September 2021, 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

Field	Content to be reported		
Venue	Zemblanco Investments Ltd	Legal Entity Identifier (LEI) 21380044MJNCYKRR2X92	
Country of Competent Authority	Cyprus		
Market Segment	N/A	XOFF	
Date of the trading day	2021-07-01		
Outages	Nature N/A	Number N/A	Average duration N/A
Scheduled Auction	Nature N/A	Number N/A	Average duration N/A
Failed Transactions	0	0	0

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

Financial Instrument	Name	ISIN
Equity/Shares	Intellect Lending Group Ltd 7.0 08/12/22, EUR	XS1332331302
Instrument classification (CFI code)	DBFNBR	
Currency	EUR	

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

Date of the trading day		2021-07-01		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			103	11:29:00	636394.23	OTC	N/A	N/A	N/A
	2									
	3									
11.30.00	1									
	2									
	3									
13.30.00	1									
	2									
	3									
15.30.00	1									
	2									
	3									

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

Date of the trading day	2021-07-01
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SIMPLE AVERAGE TRANSACTION PRICE	103
VOLUME-WEIGHTED TRANSACTION PRICE	103
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	https://zemblanco.com/about-us/our-company/	
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

Date of the trading day	2021-07-01
Number of orders or request for quotes received	2
Number of transactions executed	2
Total value of transactions executed	1272788,46
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	636394,23
Median size of all orders or requests for quote	636394,23
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		
Venue	Zemblanco Investments Ltd	Legal Entity Identifier (LEI) 21380044MJNCYKRR2X92	
Country of Competent Authority	Cyprus		
Market Segment	N/A	XOFF	
Date of the trading day	2021-07-01		
Outages	Nature N/A	Number N/A	Average duration N/A
Scheduled Auction	Nature N/A	Number N/A	Average duration N/A
Failed Transactions	0	0	0

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

Financial Instrument	Name	ISIN
Equity/Shares	Intellect Lending Group Ltd 7.0 08/12/22, EUR	XS1332331302
Instrument classification (CFI code)	DBFNBR	
Currency	EUR	



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

Date of the trading day		2021-07-01		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			103	14:33:40	406875	OTC	N/A	N/A	N/A
	2									
	3									
15.30.00	1									
	2									
	3									

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

Date of the trading day	2021-07-01
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SIMPLE AVERAGE TRANSACTION PRICE	103
VOLUME-WEIGHTED TRANSACTION PRICE	103
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	https://zemblanco.com/about-us/our-company/	
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

Date of the trading day	2021-07-01
Number of orders or request for quotes received	2
Number of transactions executed	2
Total value of transactions executed	813750
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	406875
Median size of all orders or requests for quote	406875
Number of designated market makers	0