

## Summary of changes

### BEST INTEREST AND ORDER EXECUTION POLICY

Zemblanco Investments LTD (here and after “the Company”), with regards to the Company’s development towards the goals to achieve the best results for its clients and in order to comply with the The Markets in Financial Instruments Directive 2014/65/EU (“MiFID II”), the Markets in Financial Instruments Regulation (EU) No 600/2014 (“MiFIR”), and other relevant regulations and guidelines issued by the European Securities and Markets Authority (“ESMA”) and/or CySEC (hereinafter collectively referred to as the “MiFID II framework”) , proceeded with following changes in its Best Interest and Order Execution Policy.

1. In the Article 5 “Best Execution Criteria” of the Policy , in accordance with paragraph 3b) of Article 66 of the Commission Delegated Regulation (EU) 2017/565, the Company assigned particular importance levels to the Best Execution Factors and incorporated Factors Importance Table in the Company's Summary Order Execution Policy.
2. The Company evaluated and completed assessment of new third-party Execution Venue, Bank Otkritie Financial Corporation PJSC. And in the Article 8 “Execution Venues” of the Policy the Company updated its list of execution venues accordingly.
3. The Company updated Article 9 “Important Disclosures” of its Best Interest and Order Execution Policy, in accordance with the DIRECTIVE 2014/65/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 15 May 2014 and EU Regulation 2017/565, where it is sated that the Company is required now to make public on an annual basis, for each class of financial instruments, the top five execution venues in terms of trading volumes where it executed client orders in the preceding year and information on the quality of execution obtained. Similar information shall be reported with respect to the top five entities or investment firms (e.g. brokers) (e.g. brokers) where the Company transmitted or placed client orders for execution in the preceding year.

The Company will publish an annual Execution Quality Summary Statement (EQSS) which will, for each class of financial instruments, include a summary of the analysis and conclusions the Company will draw from its detailed monitoring of the quality of execution obtained on the execution venues where all client orders were executed in the previous year.

4. Throughout the Policy, there were adopted and adjusted other non-material changes in the Company’s Best Interest and Order Execution Policy.

16.04.2018