

**RTS 28 Report for the period of 01 January 2018 - 31 December 2018**

Key Capital Private ('KCP') is authorised by the Central Bank of Ireland as an investment firm under the European Union (Markets in Financial Instruments) Regulations 2017 (as amended) for the provision of the investment service of the reception and transmission of client orders.

KCP is not authorised to execute client orders. KCP transmit orders for execution to the chosen custodian of the client. Orders that are transmitted will be executed in line with the custodian's best execution policy. The best execution policy of the custodian is provided at account opening stage which document in detail a list of execution venues and factors used for selection.

KCP do not have any close links, conflicts of interest or common ownerships with respect to any of the custodians used to transmit the orders. No changes were made to the list of custodians during the period.

KCP has negotiated discounts for our clients compared to the custodians standard charges. These discounts are outlined in our Advisory Management Agreement. We do not receive any payments from any of the custodians we place client orders with.

**Key Capital Private Disclosure of Top 5 Execution Venues 2018 (RTS 28)**

01 January 2018 - 31 December 2018

<i>Class of Instrument</i>	<i>a(i) Equities - Band 5 &amp; 6</i>				
<i>Notification if &lt; 1 average trade per business day in the previous year</i>	Y				
<i>Top five brokers for Retail clients ranked in terms of trading volumes (descending order)</i>	<i>Proportion of volume traded as percentage of total in that class</i>	<i>Proportion of orders executed as percentage of total in that class</i>	<i>Percentage of passive orders</i>	<i>Percentage of aggressive orders</i>	<i>Percentage of directed orders</i>
Deutsche Bank 7LTFWFZYICNSX8D621K86	100.00%	100.00%	N/A	N/A	N/A

<i>Class of Instrument</i>	<i>a (ii) Equities - Band 3 &amp; 4</i>				
<i>Notification if &lt; 1 average trade per business day in the previous year</i>	Y				
<i>Top five brokers for Retail clients ranked in terms of trading volumes (descending order)</i>	<i>Proportion of volume traded as percentage of total in that class</i>	<i>Proportion of orders executed as percentage of total in that class</i>	<i>Percentage of passive orders</i>	<i>Percentage of aggressive orders</i>	<i>Percentage of directed orders</i>
Credit Suisse ANGGYXNX0JLX3X63JN86	61.88%	2.11%	N/A	N/A	N/A
Deutsche Bank 7LTFWFZYICNSX8D621K86	38.12%	97.89%	N/A	N/A	N/A

<i>Class of Instrument</i>	<i>a (iii) Equities - Band 1 &amp; 2</i>				
<i>Notification if &lt; 1 average trade per business day in the previous year</i>	Y				
<i>Top five brokers for Retail clients ranked in terms of trading volumes (descending order)</i>	<i>Proportion of volume traded as percentage of total in that class</i>	<i>Proportion of orders executed as percentage of total in that class</i>	<i>Percentage of passive orders</i>	<i>Percentage of aggressive orders</i>	<i>Percentage of directed orders</i>
Deutsche Bank 7LTFWFZYICNSX8D621K86	100.00%	100.00%	N/A	N/A	N/A

<i>Class of Instrument</i>	<i>b) Debt Instruments</i>				
<i>Notification if &lt; 1 average trade per business day in the previous year</i>	Y				
<i>Top five brokers for Retail clients ranked in terms of trading volumes (descending order)</i>	<i>Proportion of volume traded as percentage of total in that class</i>	<i>Proportion of orders executed as percentage of total in that class</i>	<i>Percentage of passive orders</i>	<i>Percentage of aggressive orders</i>	<i>Percentage of directed orders</i>
Deutsche Bank 7LTFWFZYICNSX8D621K86	100.00%	100.00%	N/A	N/A	N/A

<i>Class of Instrument</i>	<i>k) ETFs</i>				
<i>Notification if &lt; 1 average trade per business day in the previous year</i>	Y				
<i>Top five brokers for Retail clients ranked in terms of trading volumes (descending order)</i>	<i>Proportion of volume traded as percentage of total in that class</i>	<i>Proportion of orders executed as percentage of total in that class</i>	<i>Percentage of passive orders</i>	<i>Percentage of aggressive orders</i>	<i>Percentage of directed orders</i>
Deutsche Bank 7LTFWFZYICNSX8D621K86	80.34%	92.31%	N/A	N/A	N/A
Credit Suisse ANGGYXNX0JLX3X63JN86	19.66%	7.69%	N/A	N/A	N/A

<i>Class of Instrument</i>	<i>m) Other Instruments (UCITS &amp; AIFs)</i>				
<i>Notification if &lt; 1 average trade per business day in the previous year</i>	<i>N</i>				
<i>Top five brokers for Retail clients ranked in terms of trading volumes (descending order)</i>	<i>Proportion of volume traded as percentage of total in that class</i>	<i>Proportion of orders executed as percentage of total in that class</i>	<i>Percentage of passive orders</i>	<i>Percentage of aggressive orders</i>	<i>Percentage of directed orders</i>
Deutsche Bank 7LTWFZYICNSX8D621K86	67.64%	91.40%	N/A	N/A	N/A
Credit Suisse ANGGYXNX0JLX3X63JN86	32.36%	8.60%	N/A	N/A	N/A