

RTS 28 Report for the period of 01 January 2019 - 31 December 2019

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 unless instructed otherwise by the client. The best execution policy of the custodian is provided at account opening stage which documents in detail a list of execution venues available 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 custodian's 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.

Detailed information on the execution venues used by the custodians and the quality of execution is available on the respective websites of the custodians.¹

Key Capital Private Disclosure of Top 5 Execution Venues 2019 (RTS 28)

01 January 2019 - 31 December 2019

Class of Instrument		a(i) Equities - Band 5 & 6				
Notification if < 1 average trade per business day in the previous year		Y				
Top five brokers for Retail clients ranked in terms of trading volumes (descending order)		Proportion of volume traded as 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
Credit Suisse ANGGYXNX0JLX3X63JN86		77.74%	9.09%	N/A	N/A	N/A
Deutsche Bank 7LTFWFZYICNSX8D621K86		22.26%	90.91%	N/A	N/A	N/A

Class of Instrument		a (ii) Equities - Band 3 & 4				
Notification if < 1 average trade per business day in the previous year		Y				
Top five brokers for Retail clients ranked in terms of trading volumes (descending order)		Proportion of volume traded as 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
Deutsche Bank 7LTFWFZYICNSX8D621K86		100.00%	100.00%	N/A	N/A	N/A

Class of Instrument		a (iii) Equities - Band 1 & 2				
Notification if < 1 average trade per business day in the previous year		Y				
Top five brokers for Retail clients ranked in terms of trading volumes (descending order)		Proportion of volume traded as 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
Deutsche Bank 7LTFWFZYICNSX8D621K86		91.64%	72.73%	N/A	N/A	N/A
Credit Suisse ANGGYXNX0JLX3X63JN86		8.36%	27.27%	N/A	N/A	N/A

Class of Instrument		b) Debt Instruments				
Notification if < 1 average trade per business day in the previous year		Y				
Top five brokers for Retail clients ranked in terms of trading volumes (descending order)		Proportion of volume traded as 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

Class of Instrument		k) ETFs				
Notification if < 1 average trade per business day in the previous year		Y				
Top five brokers for Retail clients ranked in terms of trading volumes (descending order)		Proportion of volume traded as 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
Deutsche Bank 7LTFWFZYICNSX8D621K86		70.52%	93.22%	N/A	N/A	N/A
Credit Suisse ANGGYXNX0JLX3X63JN86		29.48%	6.78%	N/A	N/A	N/A

Class of Instrument		m) Other Instruments (UCITS & AIFs)				
Notification if < 1 average trade per business day in the previous year		N				
Top five brokers for Retail clients ranked in terms of trading volumes (descending order)		Proportion of volume traded as 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
Deutsche Bank 7LTFWFZYICNSX8D621K86		71.76%	85.32%	N/A	N/A	N/A
Credit Suisse ANGGYXNX0JLX3X63JN86		28.24%	14.68%	N/A	N/A	N/A

¹<https://www.db.com/company/en/best-execution-and-execution-quality-reports.htm>
<https://www.credit-suisse.com/ie/en/investment-banking/financial-regulatory/best-execution-reporting.html>