

MiFID II RTS 28 Report - Reception and Transmission of Orders Top 5 Brokers, Professional Clients
Argus Stockbrokers Ltd. - 2017

Class of Instrument		Equities – Shares & Depository Receipts - Tick size liquidity bands 5 and 6				
Notification if <1 average trade per business day in the previous year		Y				
Top five execution brokers ranked in terms of trading volumes (descending order)	Proportion of volume traded as a 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	
Saxo Bank A/S - 549300TL5406IC1XKD09	7,4%	100,0%				
CASTLE HARBOUR SECURITIES LLP - 25490004T4PRFO3MTW17	92,6%	100,0%				

Class of Instrument		Equities – Shares & Depository Receipts - Tick size liquidity bands 3 and 4				
Notification if <1 average trade per business day in the previous year		N				
Top five execution brokers ranked in terms of trading volumes (descending order)	Proportion of volume traded as a 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	
Linear Investments Limited - 213800GNOS9QQ31DCK54	6,8%	100,0%				
Saxo Bank A/S - 549300TL5406IC1XKD09	2,9%	100,0%				
CASTLE HARBOUR SECURITIES LLP - 25490004T4PRFO3MTW17	14,8%	100,0%				
LEK Securities UK Ltd - 213800DTV3A94CK4R75	75,4%	100,0%				

Class of Instrument		Equities – Shares & Depository Receipts - Tick size liquidity band 1 and 2				
Notification if <1 average trade per business day in the previous year		N				
Top five execution brokers ranked in terms of trading volumes (descending order)	Proportion of volume traded as a 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	
Linear Investments Limited - 213800GNOS9QQ31DCK54	4,1%	100,0%				
Saxo Bank A/S - 549300TL5406IC1XKD09	6,8%	100,0%				
CASTLE HARBOUR SECURITIES LLP - 25490004T4PRFO3MTW17	27,9%	100,0%				

LEK Securities UK Ltd - 213800DTVT3A94CK4R75	61,2%	100,0%			
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Class of Instrument	Exchange Traded products				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution brokers ranked in terms of trading volumes (descending order)	Proportion of volume traded as a 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
Linear Investments Limited - 213800GNOS9QQ31DCK54	18,5%	100,0%			
Saxo Bank A/S - 549300TL5406IC1XKD09	6,0%	100,0%			
CASTLE HARBOUR SECURITIES LLP - 25490004T4PRFO3MTW17	35,8%	100,0%			
LEK Securities UK Ltd - 213800DTVT3A94CK4R75	39,7%	100,0%			

Class of Instrument	Debt Instruments				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution brokers ranked in terms of trading volumes (descending order)	Proportion of volume traded as a 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
Vantage Capital Markets LLP - 2138007ZHUXSGBB53N72	88,10%	100,0%			
Merrit Capital Ltd - 21380073P7J4PAD91E29	8,57%	100,0%			
Hellenic Bank - CXUHEGU3MADZ2CEV7C11	1,98%				
SHORE Capital Stockbrokers Ltd - 2138009KZO3MK7TV6372	0,89%				
AstroBank Ltd - 549300VB6UM9TUOCYW67	0,27%				

Class of Instrument	Currency derivatives - Futures and options admitted to trading on a trading venue				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution brokers ranked in terms of trading volumes (descending order)	Proportion of volume traded as a 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
R.J. O'Brien & Associates, LLC - WOPZ3KWZW5JSJMG3U094	100,0%	100,0%			

Class of Instrument	Contract for Differeneeces				
Notification if <1 average trade per business day in the previous year	Y				

Top five execution brokers ranked in terms of trading volumes (descending order)	Proportion of volume traded as a 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
Saxo Bank A/S - 549300TL5406IC1XKD09	100,0%	100,0%			
Class of Instrument	Equity Derivatives - Options and Futures admitted to trading on a trading venue				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution brokers ranked in terms of trading volumes (descending order)	Proportion of volume traded as a 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
R.J. O'Brien & Associates, LLC - WOPZ3KWZW5JSJMG3U094	100,0%	100,0%	93,4%	6,6%	
Class of Instrument	Commodities derivatives and emission allowances Derivatives				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution brokers ranked in terms of trading volumes (descending order)	Proportion of volume traded as a 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
R.J. O'Brien & Associates, LLC - WOPZ3KWZW5JSJMG3U094	100,0%	100,0%			
Class of Instrument	Interest rates derivatives - Futures and options admitted to trading on a trading venue				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution brokers ranked in terms of trading volumes (descending order)	Proportion of volume traded as a 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
R.J. O'Brien & Associates, LLC - WOPZ3KWZW5JSJMG3U094	100,0%	100,0%			
Explanatory Note Top 5 Venues					

Classification of Passive / Aggressive Orders:

- Aggressive order is defined as an order that is submitted to a venue which runs an order book and took liquidity on the order book
- Passive order is defined as an order that is submitted to a venue which runs an order book and provided liquidity on the order book
- For orders executed via venues/liquidity providers/market makers not running an order book the passive/aggressive classification is not relevant and thus is not specified.
- No orders are directed as thus field is not specified

Categorisation of Products into Classes of Financial Instruments:

- Equities – Shares & Depositary Receipts

o Cash Shares covered by the MiFID II tick size regime. Instruments are placed into liquidity bands based on the ADNT (average daily number of transactions) values published by ESMA (Liquidity Band 6 can be seen as representing the the most liquid instruments and Liquidity Band 1 the least liquid instruments, based on ADNT values.)

- Interest rates derivatives - Futures and options admitted to trading on a trading venue

o Contract Futures and Contract Options within sectors “Financials - Short-term Interest Rates” and “Financials – Bonds”

- Currency derivatives - Futures and options admitted to trading on a trading venue

o Contract Futures and Contract Options within sector “Financials – Currencies”

- Equity Derivatives - Options and Futures admitted to trading on a trading venue

o Contract Futures and Contract Options within sector “Stock Indices” and Stock Options and Stock Index Options

- Securitised Derivatives - Warrants and Certificate Derivatives

o Warrants

- Commodities derivatives and emission allowances Derivatives - Options and Futures admitted to trading on a trading venue

o Contract Futures and Contract Options within sectors “Agriculture”, “Base Metals”, “Commodity Index”, “Energies”, “Meats”, “Precious Metals”, “Softs”

- Contracts for difference

o CFDs on Single Stocks/ETFs executed via agency model

- Exchange traded products (Exchange traded funds, exchange traded notes and exchange traded commodities)

o ETFs, ETN, ETC

- Other

o Mutual Funds

Data:

Data:

This first set of RTS 28 report is based on data for the calendar year 2017. However it should be noted that data on passive/aggressive indicators for orders is only included for Dec 2017 , as data for the full preceeding year has not been available. Thus indicator is not available for brokers/venues with no executions in Dec 2017.

ESMA has recognized that for the first set of RTS 28 reports, firms may not be able to fully report on information which is not available or applicable in relation to the preceding year e.g. where it is tied to new provisions stemming from MiFID II or MiFIR. (Question/Answer 6): https://www.esma.europa.eu/system/files_force/library/esma35-43-349_mifid_ii_qas_on_investor_protection_topics.pdf

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Class of Instrument	Equities – Shares & Depositary Receipts - Tick size liquidity bands 5 and 6				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution brokers ranked in terms of trading volumes (descending order)	Proportion of volume traded as a 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
Linear Investments Limited - 213800GNOS9QQ31DCK54	72,9%	100,0%			
Saxo Bank A/S - 549300TL5406IC1XKD09	24,7%	100,0%			
CASTLE HARBOUR SECURITIES LLP - 25490004T4PRFO3MTW17	2,4%	100,0%			

Class of Instrument	Equities – Shares & Depositary Receipts - Tick size liquidity bands 3 and 4				
Notification if <1 average trade per business day in the previous year	N				
Top five execution brokers ranked in terms of trading volumes (descending order)	Proportion of volume traded as a 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
Linear Investments Limited - 213800GNOS9QQ31DCK54	17,7%	100,0%			
Saxo Bank A/S - 549300TL5406IC1XKD09	28,8%	100,0%			
CASTLE HARBOUR SECURITIES LLP - 25490004T4PRFO3MTW17	43,8%	100,0%			
LEK Securities UK Ltd - 213800DTVT3A94CK4R75	9,7%	100,0%			

Class of Instrument	Equities – Shares & Depositary Receipts - Tick size liquidity band 1 and 2				
Notification if <1 average trade per business day in the previous year	N				

Top five execution brokers ranked in terms of trading volumes (descending order)	Proportion of volume traded as a 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
Linear Investments Limited - 213800GNOS9QQ31DCK54	10,4%	100,0%			
Saxo Bank A/S - 549300TL5406IC1XKD09	64,0%	100,0%			
CASTLE HARBOUR SECURITIES LLP - 25490004T4PRFO3MTW17	11,2%	100,0%			
LEK Securities UK Ltd - 213800DVT3A94CK4R75	14,4%	100,0%			

Class of Instrument	Exchange Traded products				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution brokers ranked in terms of trading volumes (descending order)	Proportion of volume traded as a 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
Linear Investments Limited - 213800GNOS9QQ31DCK54	74,5%	100,0%			
Saxo Bank A/S - 549300TL5406IC1XKD09	12,0%	100,0%			
CASTLE HARBOUR SECURITIES LLP - 25490004T4PRFO3MTW17	11,3%	100,0%			
LEK Securities UK Ltd - 213800DVT3A94CK4R75	2,2%	100,0%			

Class of Instrument	Debt Instruments				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution brokers ranked in terms of trading volumes (descending order)	Proportion of volume traded as a 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
Vantage Capital Markets LLP - 2138007ZHUXSGBB53N72	52,88%	100,0%			
SHORE Capital Stockbrokers Ltd - 2138009KZO3MK7TV6372	34,74%	100,0%			
CASTLE HARBOUR SECURITIES LLP - 25490004T4PRFO3MTW17	6,32%	100,0%			
Leonteq Securities AG - ML61HP3A4MKTTA1ZB671	4,27%	100,0%			
Hellenic Bank - CXUHEGU3MADZ2CEV7C11	1,02%	100,0%			

Class of Instrument	Contract for Differeneeces				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution brokers ranked in terms of trading volumes (descending order)	Proportion of volume traded as a 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
Saxo Bank A/S - 549300TL5406IC1XKD09	100,0%	100,0%			

Class of Instrument	Currency derivatives - Futures and options admitted to trading on a trading venue				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution brokers ranked in terms of trading volumes (descending order)	Proportion of volume traded as a 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
Saxo Bank A/S - 549300TL5406IC1XKD09	100,0%	100,0%			

Class of Instrument	Equity Derivatives - Options and Futures admitted to trading on a trading venue				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution brokers ranked in terms of trading volumes (descending order)	Proportion of volume traded as a 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
Saxo Bank A/S - 549300TL5406IC1XKD09	100,0%	100,0%	93,4%	6,6%	

Class of Instrument	Securitised Derivatives - Warrants and Certificate Derivatives				
Notification if <1 average trade per business day in the previous year	Y				
Top five execution brokers ranked in terms of trading volumes (descending order)	Proportion of volume traded as a 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
Saxo Bank A/S - 549300TL5406IC1XKD09	100,0%	100,0%			

Explanatory Note Top 5 Venues					
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Classification of Passive / Aggressive Orders:

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o ETFs, ETN, ETC

- Other

o EU Cash Shares not covered by the MiFID II tick size regime o US and APAC Cash Shares

o Mutual Funds

Data:

Data:

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