

RTS 28 – Qualitative disclosure

Execution model

finnCap is a registered market maker for a number of equity securities listed on the London Stock Exchange (LSE). We make markets mostly for securities on the LSE's AIM market. We also provide execution services in relation to other equity securities listed on the LSE and elsewhere.

In addition, we have the ability to route to venues other than the LSE or AIM, using various third party services.

Our Best Execution and Order Handling Policy (BEOP) sets out our approach to taking into account a set of execution factors. It can also be found on our website: <https://www.finnCap.com/policies>. All of our trading clients are classed as Professional Clients.

To monitor our compliance with our BEOP, among other things, we use a third-party provider that allows us to run various reports on the execution achieved. We analyse outliers beyond certain thresholds.

Assessment of the execution arrangements

We believe that our arrangements continue to ensure best execution for our clients.

We continue to monitor market and regulatory developments as they impact our execution arrangements.

Relationship to execution venues and brokers

finnCap is a member of the LSE and AIM and a user of various third party services. We have no close links to any of these entities. Our execution arrangements and agreements with these providers are on standard terms.