



Optimus Capital LLP Execution Report

Introduction

The second Markets in Financial Instruments Directive and delegated regulations (“MiFIDII/R”) requires investment firms to disclose the quality of execution and the top five execution venues for financial instruments on an annual basis.

Optimus Capital LLP (“Optimus”) has an obligation to achieve the best possible result when executing trades and can execute through direct access to a venue or by transmitting orders to a third party.

General Disclosures

Optimus has no close relationships or links with the execution venues or brokers used to execute orders. Optimus has no common ownerships with these execution venues or brokers. Therefore, Optimus has no conflicts of interests with the execution venues or brokers used for order execution.

Optimus does not make or receive any payments, discounts, rebates or non-monetary benefits to or from the execution venues or brokers. For Discretionary Fund Management (“DFM”) clients, Raymond James provide back-office and middle-office support functions as well as trading functions, which are charged at commercial rates.

Optimus has both retail and professional clients, different categories of client are not treated differently; however for DFM clients Raymond James provide execution of orders.

At the time of preparing this report, there are no consolidated tape providers in Europe.

Execution Factors

When executing trades, Optimus considers the following (non-exhaustive) list of execution factors:

- Price
- Cost
- Speed of execution
- Likelihood of execution and settlement
- Size of order
- Nature of order

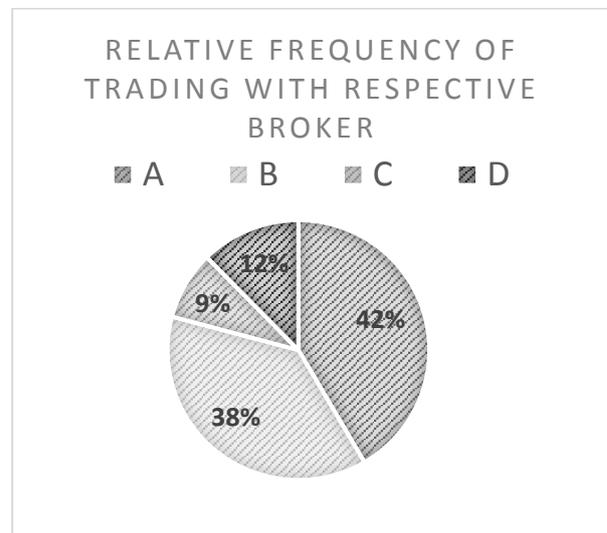
- Type and characteristics of the financial instrument
- The characteristics of the possible execution venue

When executing trades, no single factor is considered solely on its own. Instead, total consideration of all factors ensures the best possible result regarding the execution of investments. Total consideration will most commonly be a combination of price, cost, speed and likelihood of execution. Optimus’ order execution policy is available on our website.

Exchange Traded Funds (“ETF”)

It is possible that the implicit costs of trading arising from factors, such as price movement, can be larger than the explicit costs of trading, such as fees and commission. As such, liquidity considerations drive Optimus’s choice of execution venue.

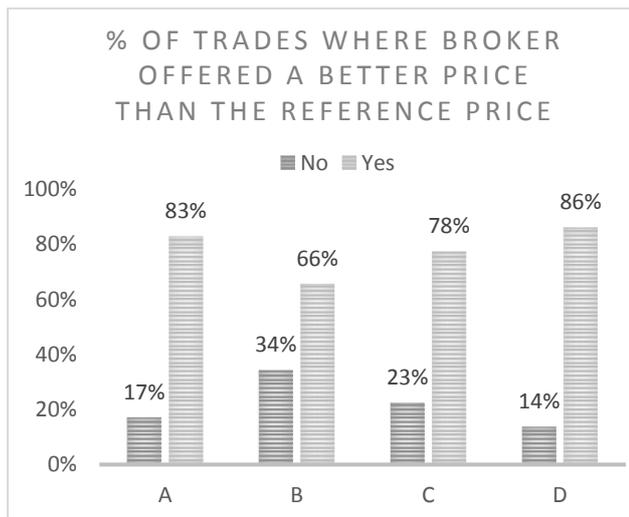
Optimus’s primary venue for execution is Bloomberg Multilateral Trading Facility (“BMTF”). BMTF allows for best execution because it provides access to a panel of ETF market makers (brokers) through a Request for Quote (“RFQ”) system. The RFQ protocol allows brokers to compete by quoting prices to ‘win’ Optimus’ order. The broker who offers the best price therefore wins the right to trade.



Additional brokers have been added to the panel during 2019 to provide additional coverage for the range of ETFs traded.

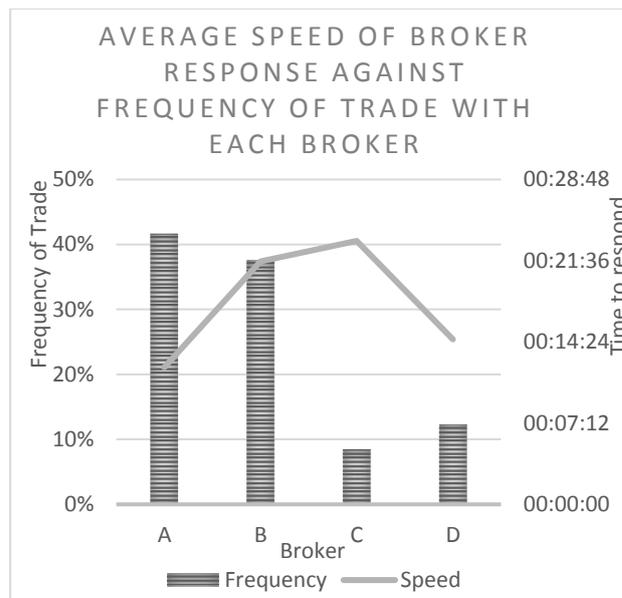
The key to best execution using BMTF’s RFQ protocol is that competition exists. Brokers provide quotes knowing they are in competition with one another and therefore aim to offer a better price not knowing other quotes by potential other brokers.

Optimus received a quote from three or more brokers for 72% of all trades executed. For 97% of all trades executed, Optimus received a quote from at least two brokers. Therefore, there was sufficient competition between brokers which, using a RFQ protocol, leads to achieving 'best price'. For 100% of trades executed, Optimus 'hit' the broker whom offered the best possible price out of all quotes offered by brokers. For 76% of trades executed, the execution price was better than or equal to the reference price.

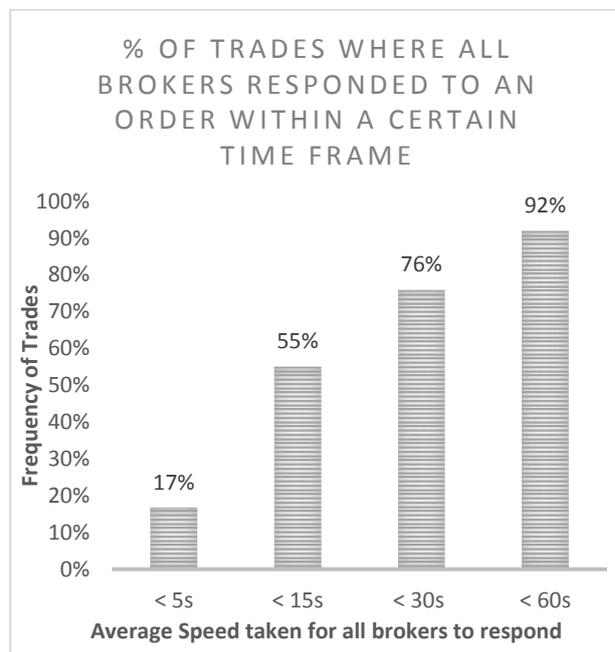


Optimus measured the average implicit cost of trading with each broker by comparing the price received for each trade with the midpoint of the BMTF reference spread. In order to determine the extent to which implicit costs were minimised.

Regarding the speed of execution, Optimus considers the relative frequency it traded with each broker against the average time each broker took to offer a quote after Optimus traders had placed an order. For 70% of securities traded, the broker with the highest frequency of trade for a particular security would either be the fastest or second fastest broker to produce a quote.

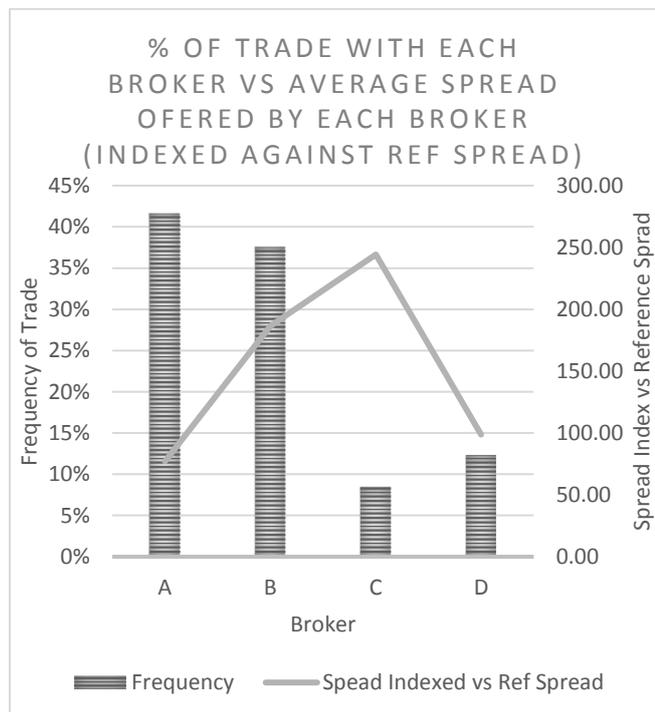


Considering the average time taken for all brokers to respond with a quote to an Optimus order. For 92% of trades, all brokers had responded to an Optimus order within 60 seconds whilst for 76% of trades, all brokers had responded within 30 seconds. Therefore, Optimus received quotes from all brokers for all trades within an acceptable time horizon that would not expose Optimus' dealings to the risk of large market movements.



Liquid markets allow for the highest probability of execution. The broker that offers the greatest liquidity should offer the best chance of execution, the highest quality of execution and the best possible result. Bid-offer spreads act as a proxy for liquidity such that narrow bid-offer spreads typically imply higher liquidity. Optimus had the highest frequency of trade with the broker that

offered the narrowest or second narrowest bid-offer spread (relative to the reference bid-offer spread) for 74% of all securities traded.



The broker with the highest relative frequency of trade was, on average, the quickest broker to respond to an Optimus order; the broker that offered the narrowest spread on trades (relative to the reference spread) and the broker that minimised implicit costs.

In the period, 100% of trades executed received at least one quote (and were therefore filled) and 100% of trades executed were settled.

Attempts at using available RTS 27 reports have not yielded further insight into trading beyond that being undertaken separately some of which has been summarised above.

Foreign Exchange ("FX")

Currency execution is utilised to hedge share classes not priced in the base currency (GBP) of Optimus's UCITS funds. This hedging can occur via FX swaps, forwards and spot trades. Certainty of execution at or around the WM 16.00 London price has greater importance than other factors, in order to ensure that investor's assets are hedged at the most appropriate time for the fund.

Forward FX transactions are executed with counterparties that have an international swaps and derivatives association (ISDA) agreement with Optimus. ISDAs determine the outcome of an open position in the

event of the default of either counterparty. The Bank of New York Mellon is the counterparty that Optimus has an ISDA with to execute currency spot trades and derivatives. The Bank of New York Mellon also provides depositary services to the Optimus Multi-Strategy UCITS Funds ICAV (the "UCITS") under a separate agreement.

Open-ended collective investment schemes

Where Optimus invested or redeemed units in an open-ended collective investment scheme not traded on an exchange, the order is executed directly with the scheme administrator, at prices and costs set by them. Therefore, Optimus believe that best execution is achieved on a consistent basis.

Should you require further information in respect of the disclosure please address all enquiries to:

Optimus Capital LLP

Eighth Floor Park House

116 Park Street

London, W1K 6SS

T: 020 7535 1700

operations@optimuscapital.com

Optimus Capital LLP is a limited liability partnership registered in England and Wales, No OC348019 at 8th Floor, Park House, 116 Park Street, London W1K 6SS and is authorised and regulated by the Financial Conduct Authority, No 506790. Investments referred to are subject to market fluctuations, there can be no assurance that appreciation will occur and the value of investments can fall as well as rise. Please see our website for further risk warnings and disclaimers.