



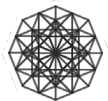
MiFID II Best Execution Disclosure for Gemcorp Capital Management Limited – *January 2023*

Gemcorp Capital Management Limited (“Gemcorp”) is registered with the UK Financial Conduct Authority as a full-scope Alternative Investment Fund Manager with top-up permissions in respect of its activities in relation to managed accounts. The MiFID II best execution disclosure requirements outlined in RTS28 therefore only apply to Gemcorp in respect of its MiFID business which, for the year 2022, consists solely of acting as investment manager to a single managed account, (“EMFI”) and being the delegated investment manager of a Luxembourg SICAV.

Further, the disclosure requirements relate only to order placement and transmission activities and not to direct executions.

Gemcorp transacts in a number of instrument types consisting of bonds, loans, repo financing trades, and foreign exchange trades.

In all cases, Gemcorp transacts via direct execution and not order placement via third parties (indirect execution). As such, we believe that Gemcorp has no reporting obligation under RTS28.



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Gemcorp Capital Management Limited is authorised and regulated by the Financial Conduct Authority