

ZENITH BANK (UK) LIMITED

39, Cornhill London, EC3V 3ND United Kingdom

Annual Report: information on the identity of execution venues and on the quality of trades executed between 1 January 2018 and 31 December 2018

Zenith Bank UK Ltd (ZBUK) executed bond trades for both retail and professional clients during 2018, as outlined in the table below. Bonds are traded OTC (over the counter) and ZBUK trades as principal for these transactions; executing as the counterparty of our retail and professional clients. This means there is no execution venue other than ZBUK itself.

ZBUK maintains an arms-length order policy to ensure that best execution is maintained at all times; taking into account price, costs, speed, execution likelihood, size and the nature of the order.

In achieving best execution for our customers trading in bonds, price is usually the most important factor. Therefore, to achieve best executions ZBUK matches or improves upon the best executable price available on the market at the time an order is placed, to ensure that the client receives a 'best' executable price in a timely manner.

During this process, ZBUK utilises pricing tools on Bloomberg alongside trading platforms and broker price runs.

If a client stipulates any other factor as being more important than price, or if ZBUK recognises such a factor as being more important, we will take this into consideration in order to achieve best execution.

Class of Instrument:	Bonds				
Top 5 execution venues ranked in	Proportion	Proportion	Percentage	Percentage	Percentage
terms of trading volumes	of volume	of orders	of passive	of	of directed
(descending order)	traded as a	executed as	orders	aggressive	orders
	percentage	percentage		orders	
	of total in	of total in			
	that class	that class			
Zenith Bank (UK) Limited	100%	100%	N/A	N/A	0
BFM8T61CT2L1QCEMIK50	100%	100%	IN/ A	IN/ A	<u> </u>

Close Links

Zenith Bank (UK) Ltd is a subsidiary of Zenith Bank PLC. Our Nigerian background — coupled with the bank's network of West African offices — provides customers with tangible market insights and a better understanding of the opportunities which exist within the African continent.



Client Categorisation

ZBUK trades on behalf of retail and professional clients. ZBUK traders act upon instruction from the customer relationship manager and acts in accordance with ZBUK's best execution policy – we do not treat clients differently based on their categorisation for the purposes of best execution.

Specific Arrangements

Zenith UK does not receive payments, discounts, rebates or non-monetary benefits in its trading arrangements.

Consolidated Tape Usage

Consolidated tapes were not utilised for any class of financial instrument during 2018.

However, should they be applicable for any asset class then we will assess and determine whether it would worthwhile to implement this information.

End.