



Heartwood Investment Management Annual Best Execution Summary Analysis (RTS 28) – 2019

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In accordance with Heartwood Investment Management’s (“Heartwood”) best execution obligations under MiFID II (Markets in Financial Instruments Directive II), we are required to publish an annual report which: (a) summarises the analysis and conclusions drawn from the monitoring of the quality of execution obtained from execution venues used by Heartwood; and, (b) details the top five execution venues in terms of trading volumes for all orders placed per class of financial instrument for the preceding calendar year.

This document summarises the analysis and conclusions drawn from the monitoring of the quality of execution obtained from execution venues in 2019 (the “Report”). This Report details the top five execution venues for each class of instrument for both professional and retail clients respectively. The following information is provided for each class of financial instrument in which Heartwood has executed trades:

- a. The Execution Factors: detailing the relative importance that Heartwood gave to the execution factors of price, cost, speed, likelihood of execution or any other considerations including qualitative factors when assessing the quality of execution;
- b. Close Links: details of any close links and/or conflicts of interests with regard to any execution venues used by Heartwood;
- c. Specific Arrangements: details of any specific arrangements that Heartwood has with any execution venues for example, payments made or received, discounts, rebates or any non-monetary benefits received;
- d. Change in Execution Venues: details of any changes, if any, made to the list of execution venues used by Heartwood together with an explanation as to why such change was made;
- e. Client Categorisation: rationale for different approaches to order execution according to client categorisation and, if applicable, situations where Heartwood treats clients differently in such a way that it may affect order execution arrangements; and
- f. Data and Tool Usage: details of how Heartwood has used any data or tools relating to the quality of execution including any data published by execution venues and/or systematic internalisers.

Heartwood’s Order Execution Policy can be found on Heartwood’s website under <http://www.heartwoodgroup.co.uk/best-execution-and-order-handling/>.

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1. Equities – Shares & Depositary Receipts¹

Qualitative Review

Execution Factors

When we trade in shares and depositary receipts, when we assess the quality of execution, the main factors we consider are price and costs. We also consider the speed and likelihood of execution; type and size of order; and, settlement. When dealing in less liquid securities, speed and likelihood of execution may take precedence over price and costs.

The majority of orders were placed with BNY Mellon's brokerage services during the reporting period. We use BNY Mellon's brokerage services when access to execution venues is limited, or where it is not cost effective to use such execution venues. For example, where the costs associated with the initial onboarding and ongoing due diligence associated with these execution venues would outweigh the cost of using their brokerage services.

Please see our Order Execution Policy for more detail on how we apply execution factors to client orders and how we prioritise those factors.

Close Links

Heartwood does not have any close links, conflicts of interests, or common ownerships with respect to any execution venues or brokers used to execute orders in equities (shares and depositary receipts).

Any dealings or relationships between Heartwood and execution venues or brokers are conducted in accordance with our Conflicts of Interest Policy.

Specific Arrangements

Heartwood does not have any specific arrangements with any execution venues or brokers used to execute orders in equities (shares and depositary receipts) regarding payments made or received, discounts, rebates or non-monetary benefits. However, Heartwood uses BNY Mellon's Depositary and Custodial services.

Change in Execution Venues

There have been no changes to the list of execution venues during the reporting period.

Order Execution by Client Categorisation

We have a number of retail and professional clients. We acknowledge that there are inherent differences between client types, the different services that we offer and the outcomes agreed for each individual client. Therefore, rather than taking a "one size fits all" approach, order execution may differ according to client categorisation; by doing so, we are able to focus on the execution factors that are important for each type of client. Our approach has been developed with regard to best industry practice, regulation and law.

Data and Tool Usage

We consistently monitor the quality of execution provided by execution venues and brokers through the use of automatic monitoring tools and regular qualitative analysis of the data.

Due Diligence

We conduct thorough initial and ongoing due diligence on execution venues and brokers to ensure we are receiving the best quality execution. We consider qualitative factors, such as market access, liquidity, market knowledge and product expertise, order handling process and trading costs.

¹ A proportion of ETFs that we trade feature in ESMA's Equity Transparency files. Those particular instruments are categorised as equities for the purpose of MiFID II best execution reporting. Therefore, trades in these instruments are reflected in the Equities, Shares and Depositary Receipts section of this Report.

Top 5 Execution Venues Equities – Shares & Depository Receipts

Class of Instrument

Equities – Shares & Depository Receipts - liquidity bands 1 and 2 (from 0 to 79 trades per day)

Retail Clients

Class of Instrument	Equities – Shares & Depository Receipts – liquidity bands 1 and 2				
Notification is <1 average trade per business day in the previous year	No				
Top five execution venues ranked in terms of trading volumes (in descending order)	Proportion of volume executed as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders ²	Percentage of aggressive orders ³	Percentage of directed orders ⁴
BANK OF NEW YORK 213800O5FBGOWU89LN14	61.12	17.72	N/A	N/A	N/A
WINTERFLOODS SECURITIES LTD 8BRUP6V1DX3PIG2R0745	30.22	47.43	N/A	N/A	N/A
SUSQUEHANNA INTERNATIONAL SECS 635400IAV22ZOU1NFS89	3.52	11.63	N/A	N/A	N/A
SOCIETE GENERALE O2RNE8IBXP4R0TD8PU41	1.60	5.79	N/A	N/A	N/A
CITIGROUP GLOBAL MARKETS LTD XKZZ2JZF41MRHTR1V493	1.36	5.54	N/A	N/A	N/A

Professional Clients

Class of Instrument	Equities – Shares & Depository Receipts – liquidity bands 1 and 2				
Notification is <1 average trade per business day in the previous year	No				
Top five execution venues ranked in terms of trading volumes (in descending order)	Proportion of volume executed as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
WINTERFLOODS SECURITIES LTD 8BRUP6V1DX3PIG2R0745	46.30	71.38	N/A	N/A	N/A
NUMIS SECURITIES LIMITED 213800P3F4RT97WDSX47	20.66	1.84	N/A	N/A	N/A
BANK OF NEW YORK 213800O5FBGOWU89LN14	18.56	8.60	N/A	N/A	N/A
SUSQUEHANNA INTERNATIONAL SECS 635400IAV22ZOU1NFS89	6.55	6.41	N/A	N/A	N/A
FLOW TRADERS BV 549300CLJI9XDH12XV51	2.88	2.63	N/A	N/A	N/A

² "Passive order" means an order entered into the order book that provided liquidity

³ "Aggressive order" means an order entered into the order book that took liquidity

⁴ "Directed order" means an order where a specific execution venue was specified by the client prior to the execution of the order

Class of Instrument

Equities – Shares & Depositary Receipts - liquidity bands 3 and 4 (from 80 to 1999 trades per day)

Retail Clients

Class of Instrument	Equities – Shares & Depositary Receipts – liquidity bands 3 and 4				
Notification is <1 average trade per business day in the previous year	No				
Top five execution venues ranked in terms of trading volumes (in descending order)	Proportion of volume executed as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
WINTERFLOODS SECURITIES LTD 8BRUP6V1DX3PIG2R0745	42.83	41.69	N/A	N/A	N/A
BANK OF NEW YORK 213800O5FBGOWU89LN14	39.36	10.63	N/A	N/A	N/A
SUSQUEHANNA INTERNATIONAL SECS 635400IAV22ZOU1NFS89	8.70	17.42	N/A	N/A	N/A
FLOW TRADERS BV 549300CLJI9XDH12XV51	3.58	7.66	N/A	N/A	N/A
BARCLAYS CAPITAL SECURITIES K9WDOH4D2PYBSLSOB484	2.01	4.61	N/A	N/A	N/A

Professional Clients

Class of Instrument	Equities – Shares & Depositary Receipts – liquidity bands 3 and 4				
Notification is <1 average trade per business day in the previous year	No				
Top five execution venues ranked in terms of trading volumes (in descending order)	Proportion of volume executed as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
WINTERFLOODS SECURITIES LTD 8BRUP6V1DX3PIG2R0745	39.38	68.10	N/A	N/A	N/A
BANK OF NEW YORK 213800O5FBGOWU89LN14	27.53	5.52	N/A	N/A	N/A
SUSQUEHANNA INTERNATIONAL SECS 635400IAV22ZOU1NFS89	9.84	9.07	N/A	N/A	N/A
SOCIETE GENERALE O2RNE8IBXP4R0TD8PU41	9.23	3.37	N/A	N/A	N/A
FLOW TRADERS BV 549300CLJI9XDH12XV51	4.00	4.40	N/A	N/A	N/A

Class of Instrument

Equities – Shares & Depositary Receipts - liquidity bands 5 and 6 (from 2000 trades per day)

Retail Clients

Class of Instrument	Equities – Shares & Depositary Receipts – liquidity bands 5 and 6				
Notification is <1 average trade per business day in the previous year	Yes				
Top five execution venues ranked in terms of trading volumes (in descending order)	Proportion of volume executed as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
BANK OF NEW YORK 213800O5FBGOWU89LN14	95.86	51.87	N/A	N/A	N/A
WINTERFLOODS SECURITIES LTD 8BRUP6V1DX3PIG2R0745	3.67	47.06	N/A	N/A	N/A
HEARTWOOD WEALTH MANAGEMENT 213800HK727V5WI17K12	0.48	1.07	N/A	N/A	N/A

Professional Clients

Class of Instrument	Equities – Shares & Depositary Receipts – liquidity bands 5 and 6				
Notification is <1 average trade per business day in the previous year	Yes				
Top five execution venues ranked in terms of trading volumes (in descending order)	Proportion of volume executed as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
BANK OF NEW YORK 213800O5FBGOWU89LN14	100.00	100.00	N/A	N/A	N/A

2. Debt Instruments

Qualitative Review

Execution Factors

When we assess the quality of execution for debt instruments, the main factor we consider is execution price, with the aim to maximise value for our clients.

Illiquidity in the debt market may cause other factors to take precedence over price for example, the likelihood of execution.

Please see our Order Execution Policy for more detail on how we apply execution factors to client orders and how we prioritise those factors.

Close Links

Heartwood does not have any close links, conflicts of interests, or common ownerships with respect to any execution venues or brokers used to execute orders in debt instruments.

Any dealings or relationships between Heartwood and execution venues or brokers are conducted in accordance with our Conflicts of Interest Policy.

Specific Arrangements

Heartwood does not have any specific arrangements with any execution venues or brokers used to execute orders in debt instruments regarding payments made or received, discounts, rebates or non-monetary benefits.

Change in Execution Venues

Citigroup were introduced during the reporting period as a counterparty to trade debt instruments. Citigroup was introduced to provide us with another counterparty to deal in Japanese Government bonds. Before Citigroup was introduced, we only had one counterparty to deal in Japanese Government Bonds and such existing counterparty was suboptimal from a best execution perspective. There have been no other changes to the list of execution venues during the reporting period.

Order Execution by Client Categorisation

We have a number of retail and professional clients. We acknowledge that there are inherent differences between client types, the different services that we offer and the outcomes agreed for each individual client. Therefore, rather than taking a “one size fits all” approach, order execution may differ according to client categorisation; by doing so, we are able to focus on the execution factors that are important for each type of client. Our approach has been developed with regard to best industry practice, regulation and law.

Data and Tool Usage

We consistently monitor the quality of execution provided by execution venues and brokers through the use of automatic monitoring tools and regular qualitative analysis of the data.

Due Diligence

We conduct thorough initial and ongoing due diligence on execution venues and brokers to ensure we are receiving the best quality execution. We consider qualitative factors, such as market access, liquidity, market knowledge and product expertise, order handling process and trading costs.

Top 5 Execution Venues
Debt Instruments - Bonds

Class of Instrument
Debt Instruments - Bonds

Retail Clients

Class of Instrument	Debt Instruments - Bonds				
Notification is <1 average trade per business day in the previous year	No				
Top five execution venues ranked in terms of trading volumes (in descending order)	Proportion of volume executed as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
BARCLAYS BANK PLC (GILTS) K9WDOH4D2PYBSLSOB484	80.73	41.95	N/A	N/A	N/A
CITIGROUP GLOBAL MARKETS LTD XKZZ2JZF41MRHTR1V493	14.28	10.29	N/A	N/A	N/A
RBS GLOBAL BANKING & MARKETS RR3QWICWWIPCS8A4S074	2.36	42.08	N/A	N/A	N/A
BANK OF NEW YORK 213800O5FBGOWU89LN14	2.08	1.58	N/A	N/A	N/A
JEFFERIES S5THZMDUJCTQZBTRV198	0.54	4.09	N/A	N/A	N/A

Professional Clients

Class of Instrument	Debt Instruments - Bonds				
Notification is <1 average trade per business day in the previous year	No				
Top five execution venues ranked in terms of trading volumes (in descending order)	Proportion of volume executed as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
BARCLAYS BANK PLC (GILTS) K9WDOH4D2PYBSLSOB484	91.79	38.03	N/A	N/A	N/A
RBS GLOBAL BANKING & MARKETS RR3QWICWWIPCS8A4S074	4.70	50.27	N/A	N/A	N/A
CITIGROUP GLOBAL MARKETS LTD XKZZ2JZF41MRHTR1V493	3.51	7.98	N/A	N/A	N/A
BANK OF NEW YORK 213800O5FBGOWU89LN14	0.01	1.60	N/A	N/A	N/A
SG OPTION EUROPE SA O2RNE8IBXP4R0TD8PU41	0.00	0.53	N/A	N/A	N/A

3. Securitised Derivatives

Qualitative Review

Execution Factors

When we assess the quality of execution for securitised derivatives, the main factors we consider is likelihood of execution, execution price and costs.

When making a decision to invest in derivatives or derivative-embedded structures, we aim to ascertain the 'fairness' and 'robustness' of the proposed price quoted by the provider by, where appropriate, gathering the data used in the derivation of the price or comparing with similar products or a model price (from an appropriate data vendor).

Please see our Order Execution Policy for more detail on how we apply execution factors to client orders and how we prioritise those factors.

Liquidity conditions may mean that only one provider is able or willing to provide a price. In such circumstances, Investment Managers may decide that the investment case is strong enough to merit an investment in portfolios.

Close Links

Heartwood does not have any close links, conflicts of interests, or common ownerships with respect to any execution venues or brokers used to execute orders in securitised derivatives.

Any dealings or relationships between Heartwood and execution venues or brokers are conducted in accordance with our Conflicts of Interest Policy.

Specific Arrangements

Heartwood does not have any specific arrangements with any execution venues or brokers used to execute orders in securitised derivatives regarding payments made or received, discounts, rebates or non-monetary benefits.

Change in Execution Venues

There have been no changes to the list of execution venues during the reporting period.

Order Execution by Client Categorisation

We have a number of retail and professional clients. We acknowledge that there are inherent differences between client types, the different services that we offer and the outcomes agreed for each individual client. Therefore, rather than taking a "one size fits all" approach, order execution may differ according to client categorisation; by doing so, we are able to focus on the execution factors that are important for each type of client. Our approach has been developed with regard to best industry practice, regulation and law.

Data and Tool Usage

We consistently monitor the quality of execution provided by execution venues and brokers through the use of automatic monitoring tools and regular qualitative analysis of the data.

Due Diligence

We conduct thorough initial and ongoing due diligence on execution venues and brokers to ensure we are receiving the best quality execution. We consider qualitative factors, such as market access, liquidity, market knowledge and product expertise, order handling process and trading costs.

Top 5 Execution Venues

Securitised Derivatives – Warrants and Certificate Derivatives

Class of Instrument

Securitised Derivatives - Warrants and Certificate Derivatives

Retail Clients

Class of Instrument	Securitised Derivatives – Warrants and Certificate Derivatives				
Notification is <1 average trade per business day in the previous year	Yes				
Top five execution venues ranked in terms of trading volumes (in descending order)	Proportion of volume executed as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
CITIGROUP GLOBAL MARKETS LTD XKZZ2JZF41MRHTR1V493	100.00	100.00	N/A	N/A	N/A

Professional Clients

Class of Instrument	Securitised Derivatives – Warrants and Certificate Derivatives				
Notification is <1 average trade per business day in the previous year	Yes				
Top five execution venues ranked in terms of trading volumes (in descending order)	Proportion of volume executed as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
CITIGROUP GLOBAL MARKETS LTD XKZZ2JZF41MRHTR1V493	100.00	100.00	N/A	N/A	N/A

4. Exchange Traded Products

Qualitative Review

Execution Factors

When we assess the quality of execution for exchange traded products, the main factors we consider are execution price and costs.

Illiquidity and size of the trade may cause other factors to take precedence over price for example, the likelihood of execution. For smaller or more illiquid trades, where there is limited market capitalisation, such trades may be subject to a creation fee set by the market maker which may impact the execution price.

Please see our Order Execution Policy for more detail on how we apply execution factors to client orders and how we prioritise those factors.

We trade exchange traded products via the order execution platform Tradeweb, with a number of select counterparties. In certain circumstances, usually for smaller trades or where Tradeweb is unable to transmit the order on our behalf, deals may be executed directly with the counterparty.

Close Links

Heartwood does not have any close links, conflicts of interests, or common ownerships with respect to any execution venues or brokers used to execute orders in exchange traded products.

Any dealings or relationships between Heartwood and execution venues or brokers are conducted in accordance with our Conflicts of Interest Policy.

Specific Arrangements

Heartwood does not have any specific arrangements with any execution venues or brokers used to execute orders in exchange traded products regarding payments made or received, discounts, rebates or non-monetary benefits.

Change in Execution Venues

Flow Traders was introduced during the reporting period as an execution venue for exchange traded funds. In addition, Citigroup were introduced as a counterparty to trade exchange traded funds. Flow Traders and Citigroup were introduced to enable us to diversify our list of brokers used for exchange traded funds, both of which are recognised as two of the top liquidity providers in European exchange traded funds, which therefore adds further competition amongst our ETF counterparties using the RFQ (request for quote) on Tradeweb. There have been no other changes to the list of execution venues during the reporting period.

Order Execution by Client Categorisation

We have a number of retail and professional clients. We acknowledge that there are inherent differences between client types, the different services that we offer and the outcomes agreed for each individual client. Therefore, rather than taking a “one size fits all” approach, order execution may differ according to client categorisation; by doing so, we are able to focus on the execution factors that are important for each type of client. Our approach has been developed with regard to best industry practice, regulation and law.

Data and Tool Usage

We consistently monitor the quality of execution provided by execution venues and brokers through the use of automatic monitoring tools and regular qualitative analysis of the data.

Due Diligence

We conduct thorough initial and ongoing due diligence on execution venues and brokers to ensure we are receiving the best quality execution. We consider qualitative factors, such as market access, liquidity, market knowledge and product expertise, order handling process and trading costs.

Top 5 Execution Venues Exchange Traded Products

Class of Instrument

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

Retail Clients

Class of Instrument	Exchange traded products (exchange traded funds, exchange traded notes and exchange traded commodities)				
Notification is <1 average trade per business day in the previous year	No				
Top five execution venues ranked in terms of trading volumes (in descending order)	Proportion of volume executed as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
FLOW TRADERS BV 549300CLJ19XDH12XV51	32.36	17.48	N/A	N/A	N/A
WINTERFLOODS SECURITIES LTD 8BRUP6V1DX3PIG2R0745	29.32	31.11	N/A	N/A	N/A
CITIGROUP GLOBAL MARKETS LTD XKZZ2JZF41MRHTR1V493	28.77	15.17	N/A	N/A	N/A
SUSQUEHANNA INTERNATIONAL SECS 635400IAV22ZOU1NFS89	6.83	23.91	N/A	N/A	N/A
BANK OF NEW YORK 213800O5FBGOWU89LN14	1.39	2.06	N/A	N/A	N/A

Professional Clients

Class of Instrument	Exchange traded products (exchange traded funds, exchange traded notes and exchange traded commodities)				
Notification is <1 average trade per business day in the previous year	Yes				
Top five execution venues ranked in terms of trading volumes (in descending order)	Proportion of volume executed as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
FLOW TRADERS BV 549300CLJ19XDH12XV51	48.12	25.89	N/A	N/A	N/A
CITIGROUP GLOBAL MARKETS LTD XKZZ2JZF41MRHTR1V493	28.79	13.39	N/A	N/A	N/A
SUSQUEHANNA INTERNATIONAL SECS 635400IAV22ZOU1NFS89	14.19	18.75	N/A	N/A	N/A
SOCIETE GENERALE O2RNE8IBXP4R0TD8PU41	4.77	5.36	N/A	N/A	N/A
WINTERFLOODS SECURITIES LTD 8BRUP6V1DX3PIG2R0745	3.76	33.93	N/A	N/A	N/A

5. Other Instruments – Collective Investment Schemes

Qualitative Review

Execution Factors

When we assess the quality of execution for Collective Investment Schemes (CIS), the main factors we consider are the likelihood of execution and settlement, together with costs. The costs associated with the trade directly impacts the price and, therefore, performance.

Please see our Order Execution Policy for more detail on how we apply execution factors to client orders and how we prioritise those factors.

We execute CIS trades through Calastone, an order routing system, directly with the administrator of the CIS. We do not pay fees for placing orders via Calastone.

Close Links

Heartwood does not have any close links, conflicts of interests, or common ownerships with respect to any execution venues or brokers used to execute orders in CIS.

Any dealings or relationships between Heartwood and execution venues or brokers are conducted in accordance with our Conflicts of Interest Policy.

Specific Arrangements

Heartwood does not have any specific arrangements with any execution venues or brokers used to execute orders in other instruments regarding payments made or received, discounts or rebates. Any non-monetary benefit is managed in accordance with our Conflicts of Interest Policy.

Change in Execution Venues

There have been no changes to the list of execution venues during the reporting period.

Order Execution by Client Categorisation

We have a number of retail and professional clients. We acknowledge that there are inherent differences between client types, the different services that we offer and the outcomes agreed for each individual client. Therefore, rather than taking a “one size fits all” approach, order execution may differ according to client categorisation; by doing so, we are able to focus on the execution factors that are important for each type of client. Our approach has been developed with regard to best industry practice, regulation and law.

Data and Tool Usage

We consistently monitor the quality of execution provided by execution venues and brokers through the use of automatic monitoring tools and regular qualitative analysis of the data.

Due Diligence

We conduct thorough initial and ongoing due diligence on execution venues and brokers to ensure we are receiving the best quality execution. We consider qualitative factors, such as market access, liquidity, market knowledge and product expertise, order handling process and trading costs.

Top 5 Execution Venues

Other Instruments – Collective Investment Schemes

Class of Instrument

Other Instruments – Collective Investment Schemes

Retail Clients

Class of Instrument	Other Instruments				
Notification is <1 average trade per business day in the previous year	No				
Top five execution venues ranked in terms of trading volumes (in descending order)	Proportion of volume executed as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
LINK FUND SOLUTIONS 213800X5W8ARSPPOOG16	91.19	84.12	N/A	N/A	N/A
FIDELITY 5493001OQ4Z35PKNUA37	1.88	0.14	N/A	N/A	N/A
MAJEDIE 549300Y0V6F2MPNIK094	1.05	0.42	N/A	N/A	N/A
BANK OF NEW YORK 213800O5FBGOWU89LN14	0.81	0.31	N/A	N/A	N/A
JO HAMBRO 213800544SNRYNXAG472	0.80	0.33	N/A	N/A	N/A

Professional Clients

Class of Instrument	Other Instruments				
Notification is <1 average trade per business day in the previous year	No				
Top five execution venues ranked in terms of trading volumes (in descending order)	Proportion of volume executed as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
FOREIGN & COLONIAL 2138006D76PA3UE82V16	11.28	3.55	N/A	N/A	N/A
MAJEDIE 549300Y0V6F2MPNIK094	9.94	1.64	N/A	N/A	N/A
BANK OF NEW YORK 213800O5FBGOWU89LN14	9.77	0.39	N/A	N/A	N/A
GLG INVESTMENTS 2549009ARDZE5PJY3O49	9.44	2.63	N/A	N/A	N/A
JO HAMBRO 213800544SNRYNXAG472	9.03	2.89	N/A	N/A	N/A