RIVER AND MERCANTILE
SOLUTIONS

Best Execution Policy

Solutions division

River and Mercantile Investments Limited

FCA firm reference number: 195028

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Version control Table

Version	Date	Changes/updates made	Approved by
1.0	04 January 2018	Policy updated for MiFID II	Group Head of Compliance
1.1	07 August 2019	Annual review of Policy – update of counterparty list, addition of timely execution wording but no material changes to process	
1.2	13 February 2020	Additional review by the Best Execution Committee and Compliance for any changes	

Contents

1 Introduction

This document (the "Policy") sets out the approach taken by the Solutions Division of River and Mercantile Investments Limited ("the Firm") in ensuring that the best outcome is obtained for its clients on a consistent basis when executing client orders and transmitting orders to third parties for execution.

This Policy has been updated to take into account new rules arising as a result of the implementation of the Markets in Financial Instruments Directive 2014/65/EU ("MiFID II") that came into force on 3 January 2018. Other FCA Rules and Guidance have been taken into account in designing this Policy, as have other EU regulations and ESMA Guidance where appropriate.

This Policy applies only to the execution or transmission of client orders in Financial Instruments[1], as defined in MiFID II, except where noted otherwise. It also reflects the fact that the Firm deals with professional clients only.

1.1 The Best Execution obligation

FCA rules place a high-level obligation on firms to ensure that client orders are executed on terms that are most favourable to that client, which is referred to as the 'best execution obligation'.

MiFID II has further enhanced this standard, by requiring that firms take 'all sufficient steps' to obtain the best possible result for its clients on a consistent basis when executing and transmitting orders.

For the purposes of this Policy and in relation to the best execution rules more generally, the term "client order" should be understood to mean all orders in financial instruments, whether they are executed direct in the market or transmitted to another firm to execute on the Firm's behalf that are carried out on behalf of a client. This includes orders that arise in relation to discretionary portfolio management activities, and therefore originate within the Firm rather than with the client. In this situation, the Firm still has a best execution obligation in relation to the execution of this order.

1.2 Application of FCA and EU regulations

For investment firms authorised under MiFID, the best execution rules relating to direct execution are contained in Article 27 of MiFID II and the corresponding level 2 provisions[2]. Separate requirements apply when orders are transmitted to a counterparty ("indirect execution") and these are set out primarily in Article 65 of the MiFID II Delegated Org Regulation[3]. These requirements have been implemented by the FCA in the UK in COBS 11.2A.

1.3 Direct and indirect execution

The nature of the best execution obligations differs depending on whether the Firm is executing orders directly, or whether orders are being transmitted to third parties (i.e. counterparties) for execution.

Direct execution includes situations where the Firm interacts directly with other counterparties to the trade, without going through a venue, and in addition covers situations where the Firm uses its own membership of a Trading Venue[4], or otherwise places an order directly with a Trading Venue in order to execute the trade.

Indirect execution refers to the practice of transmitting orders to counterparties, for which the counterparty is then responsible for execution. These orders may be transmitted to the counterparty by a variety of methods, including by telephone, Bloomberg chat, email and electronic order entry and transmission systems (e.g. FIX).

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[1] These are defined in Annex 1 Section C of the MiFID II Directive.

[2] For example, Articles 64 and 66 of the MiFID II Delegated Org Regulation and RTS 28.

[3] Commission Delegated Regulation (EU) 2017/565 of 25 April 2016.

[4] Trading Venues include Regulated Markets (i.e. exchanges), Multilateral Trading Facilities (MTFs), Organised Trading Facilities (OTFs), systematic internalisers, market makers and 'any other liquidity provider or an entity that performs a similar function in a third country'.

The Firm primarily executes orders directly, but in some situations may transmit orders to counterparty for execution. The list of instruments in which the Firm trades, including a breakdown of which instruments are executed directly and indirectly is included in Appendix 1.

1.4 Classes of financial instrument

The Firm currently trades actively in the classes of financial instruments set out below:

- Sovereign Bonds
- Currency derivatives
- Exchange Traded Funds (ETFs)
- Real Estate Investment Trusts (REITs)
- Collective Investment Schemes (CIS)

Of these instruments, orders in currency derivatives are primarily transmitted to counterparty for execution and the Firm therefore engages in indirect execution in relation to these instruments. However, on occasions, the Firm may execute currency derivatives directly with counterparties.

Orders in sovereign bonds, ETFs, REITs and CIS are executed directly with counterparties and therefore the full MiFID II best execution rules apply in relation to these instruments. On occasions, the Firm may choose to transmit orders to a counterparty for execution.

The complete list of the different classes of MiFID II financial instruments is contained in Appendix 2 of this Policy, together with the Firm's assessment of which classes are actively traded by the Firm and which of these are directly and/or indirectly executed.

Where appropriate, this Policy will differentiate between the treatment of each of the classes of financial instrument set out above.

1.5 Application of Policy to non-financial instruments

MiFID II best execution requirements only apply in relation to financial instruments as defined in MiFID II. However, the Firm is subject to a general regulatory obligation to treat clients fairly as well as to manage any conflict of interest, and as such endeavours to deliver the best result to clients in all transactions.

The Firm trades on behalf of clients in the following investment instruments that are not financial instruments:

- Spot FX

The firm may choose to execute transactions in spot FX both directly and indirectly. The Firm's best execution approach is designed to achieve the best market price for its clients whilst at the same time dealing in a manner to maintain the Firm's strong reputation of professionalism in the marketplace. Further details on the Firm's trading arrangements for spot FX is set out in section 2.8 below.

1.6 Execution Factors

The Firm is obliged to seek the best possible result for its client in relation to each trade. What constitutes the best possible result however may vary depending on the situation, and this may not always equate to obtaining the best price or the lowest cost. The Firm is therefore required to consider and assess the relative importance of the relevant 'execution factors' in respect of each class of financial instrument in which it trades. The Execution Factors defined in FCA rules[5] are as follows:

- **Price** – This is the price at which a transaction is executed. Where the price has varied across the transaction the blended average price will be considered.

[5] See COBS 11.2A.2 (2) for MiFID investment business.

- **Costs** – This includes explicit external costs such as counterparty, exchange or clearing fees, as well as implicit costs such as spreads and slippage. This is restricted to costs borne by the client and does not include the Firm's internal costs relating to trading.
- **Speed** – This refers to the amount of time that elapses between the trade order and the successful execution of that trade.
- **Likelihood of execution and settlement** – This refers to Firm's estimation of the probability that the trade order will be successfully completed either in whole or in part.
- **Size** – For large orders or illiquid instruments only a partial fill may be received and this may vary between counterparties and venues. Where the whole trade order is unlikely to be filled, the size of the potential fill will increase in importance.
- **Nature of the order and any other relevant considerations** – This is a broad category that covers any other factor not listed in the regulations that firms may wish to prioritise in order to achieve the best result for its clients. Examples of this may be the need to maintain anonymity and/or reduce the market impact of the trade, the need to minimise or diversify counterparty exposure, and the need to meet regulatory requirements such as trade publication and reporting.

The prioritisation of the execution factors should be reviewed at least on an annual basis and updated where necessary.

Further information is given on the Firm's prioritisation of the execution factors in different situations in sections 2 and 3 below.

1.7 Execution Criteria

FCA rules[6] also set out the 'execution criteria' that the Firm must take into account when executing a trade. These are the particular characteristics of each trade order which need to be taken into account before applying the Firm's execution process to achieve the best possible result for the client, where the 'best result' is defined by reference to the Firm's prioritisation of the execution factors as set out above. The Execution Criteria will vary potentially from client to client and from trade to trade and will therefore need to be assessed on a continual basis. These are defined as set out below:

- **The characteristic of the client** – For example whether they have been classified as professional and whether they are a natural person, institutional investor or a fund. The level of sophistication, trading frequency and size of portfolio may also be relevant.
- **The characteristic of the client order** – Factors such as the type of financial instrument, size and urgency of the order are likely to be relevant here. In some cases, the client order may also come with specific instructions from the client.
- **The characteristics of the financial instrument** – Intrinsic differences in the behaviour and attributes of different financial instruments mean that they will need to be treated differently. Market conditions should also be considered, such as whether there is liquidity at the size of order being contemplated, and whether there is significant volatility in the market.
- **The characteristics of the Trading Venues** – Relevant considerations here might be the reputation and reliability of the venue, whether the order will be subject to pre and post-trade transparency, and the types of counterparty that the order is likely to be executed against.

This Policy sets out in the following sections how the Firm applies the execution factors and execution criteria to achieve the best possible results for its clients on a consistent basis.

[6] See COBS 11.2A.8 for MiFID investment business.

1.8 Relying on a single venue

The FCA and ESMA have clarified[7] that the Firm is permitted to rely on a single venue or counterparty to execute client orders. However, in order to demonstrate that best execution is being provided in this situation, a firm must be able to show that its reliance on this single venue or counterparty provides the best possible result for its clients on a consistent basis, and that the results are at least as good as could be obtained from relying on other entities.

The Firm relies on a single Trading Venue in relation ETFs, sovereign bonds and currency derivatives.

The Firm will always aim to use a variety of methods to access markets, seeking to use the experience of counterparties in so far as they may improve the terms on which we can trade in those markets. The Firm's aim is to find the Trading venues that will help the Firm to add value to each transaction or series of transactions.

The venues selected by the Firm will help the Firm to fulfil its MiFID II obligations, in particular, the Firm's obligations in relation to best execution, transaction reporting and pre and post-trade transparency. Additionally, the venues chosen by the Firm allow for straight through processing and allow access to the Firm's selected on-venue counterparties.

Using one Trading Venue for the instruments listed above does not impair the Firm's ability to take into account the relevant importance of the execution factors.

[7] See COBS 11.2A.29G, COBS 11.2A.36G and question 3 of the best execution section of the ESMA Q&A on MiFID II and MiFIR investor protection topics (ESMA35-43-349).

2 The Execution Process

2.1 Prioritisation of the Execution Factors

The table below details the order execution strategy, venue types and execution factors considered for each asset class.

Financial Instruments	Market Facing?	Execution strategy	Venues Type	Execution factors (ranked by importance)
Sovereign Bonds	No	Orders are sent to selected authorised intermediaries, or Request For Quotes from several authorised counterparties	MTF Authorised counterparty	Likelihood of execution and settlement Costs, which are a product of: - Liquidity and size - Price - Speed of execution
Currency Derivatives	No	Orders sent to pre-determined counterparty under ISDA	MTF Authorised counterparty	Creditworthiness Costs, which are a product of: - Liquidity and size - Price - Speed of execution - Likelihood of execution and settlement
ETF	No	Orders are sent to authorised selected intermediaries, or Request For Quotes from several authorised counterparties	MTF Authorised counterparty	Likelihood of execution and settlement Costs, which are a product of: - Liquidity and size - Price - Speed of execution
REITs	No	Orders are sent to authorised selected intermediaries, or Request For Quotes from several authorised counterparties	MTF Authorised counterparty	Likelihood of execution and settlement Costs, which are a product of: - Liquidity and size - Price - Speed of execution
Collective Investment Schemes	Yes	Instruct CIS managers directly	N/A	Likelihood of execution and settlement

2.2 Pre-trade analytics

The Firm typically trades instruments with very high liquidity. Where the portfolio management team determines it is required, pre-trade analysis is conducted, which enables the Firm to evaluate the most efficient and cost-effective method of executing any given trade. This process is often adopted where the portfolio management team is executing trades in instruments for the first time and has limited experience of that instrument.

2.3 Transmission of orders to counterparties

A counterparty will be selected based on the Firm's assessment of the execution criteria in relation to that particular trade order, and in accordance with its prioritisation of the execution factors. This will typically lead to the counterparty being selected that is expected to provide the most favourable outcome for the client in terms of the price/cost of the trade, although other factors will be taken into consideration.

The counterparty will be selected from those available on the approved counterparty/venue list, which can be found in Appendix 2.

The Firm is able to transmit orders to counterparties in the following ways:

- Telephone
- Email
- Bloomberg Chat
- Electronically via a Trading Venue

Where orders are communicated via telephone a subsequent email confirming all of the details of the order are sent immediately thereafter.

2.4 OTC trades

The Firm typically executes OTC trades in relation to currency derivatives, subject to an ISDA agreement. Additionally, the Firm also acts in a discretionary capacity for clients when executing orders in OTC markets.

When trading currency derivatives, the Firm may conduct a trade cost analysis as well as obtain indicative prices from multiple counterparties, which the Firm will take into consideration - along with other execution factors - when selecting a counterparty that will produce the best possible result for the client.

Transactions in ETFs are sometimes traded directly with a counterparty, selected by the Firm, where the Firm's pre-trade analysis deems it appropriate for a transaction to be executed OTC.

The Firm will use its experience and professional judgment to determine which counterparties to approach to quote a price. Where possible, multiple counterparties will be approached in order to put them in competition with each other and therefore provide a price discovery mechanism for the trade in question. Generally, the best price will be selected from this list, unless this is overridden by the prioritisation of other execution factors over price due to the specific characteristics of the trade. An audit trail of all quotes received prior to execution will be kept on record.

2.5 Direct execution on a Trading Venue

The Firm has direct membership with a number of Trading Venues, as set out in Appendix 2.

The Trading Venue will be selected from this list based on the Firm's assessment of the execution criteria in relation to that particular trade order, and in accordance with its prioritisation of the execution factors. This will typically lead to the Trading Venue being selected that is expected to provide the most favourable price at which to execute the trade.

Where there is only one Trading Venue available for execution of the order, we will only use that single venue to fill the order.

2.6 Fair allocation, aggregation of orders

The Firm is not authorised to deal on its own account and for this reason, the Firm may choose to aggregate trades but will never allocate.

The Firm will generally execute trades on an aggregated basis when the Firm believes that to do so will allow it to obtain best execution and to negotiate more favourable transaction costs than might have otherwise been incurred had such orders been placed independently.

The Firm will usually calculate the trade sizes per client and aggregate these into a single market trade. Where the available trade size is smaller than our desired aggregated order, each client's trade is scaled back on either a pro-rata basis or based on each individual client's holdings relative to their target allocation. These processes will take place before the trade is executed in the market.

2.7 Switching transactions between portfolios

The Firm may seek to execute all or part of an order by transferring securities between clients' portfolios (switch trade). However, the Firm will only cross transactions where there is a clear operational, cost or liquidity benefit and the trade is demonstrably fair to both parties given those factors. The scenarios in which the Firm will undertake such transactions are set out in the Firm's Internal Switch Trade Policy.

2.8 Other investments outside the scope of MiFID II

The Firm actively transacts in spot FX on behalf of its clients for the purpose of enabling the settlement of securities trades priced in a currency other than GBP. The first execution factor that the Firm will consider is the likelihood of settlement, and as such, the Firm has elected to use its custodian's FX desk as its sole counterparty for execution.

However, the Firm will always consider the importance of price in relation to these trades and monitors all quotes given by the custodian's FX desks against Bloomberg market rates to ensure that the Firm always obtains a fair market price on behalf of its clients. In the event that the quote provided by the Custodian is not within the Firm's acceptable tolerance, an acceptable price is negotiated.[8]

[8] The Firm's tolerances will vary depending on the nature and size of the transaction.

3 Other considerations affecting choice of method of execution

3.1 Large transactions

Where the size of the order is large compared to the available liquidity in the market for the instrument in question, the execution criteria of 'size' will become of critical importance. The Firm will still make every effort to achieve the best possible price for the trade, and at the lowest cost, but this strategy may result in a worse average unit price being achieved than if a lower transaction size was settled upon. This will mean exploring different methods of execution and assessing the impact of splitting the trade into multiple tranches. Depending on the results of this analysis and the required time for implementation, the appropriate execution strategy will be selected.

3.2 Thinly traded markets

Where instruments are not easily replicated or there are limited Trading Venues, the Firm will focus on the likelihood and size of execution (and possibly speed, dependent on the external environment) to deliver best execution. For example, in thinly traded markets, where price points are not available, the best result for the client may be achieved by focussing on the immediacy and likelihood of execution and settlement if only a single counterparty is willing to take the other side of the trade.

3.3 Volatile markets

Where markets are seen to be particularly volatile, either across the market as a whole or in relation to the particular instrument that is the subject of the trade order, then the speed of execution will be escalated in importance. This is because in this situation the price could move rapidly against the Firm, or the liquidity could evaporate, meaning that any delay in execution could result in either a worse price being achieved or in the desired trade not being completed at all.

3.4 Short-term trading opportunities

There may also be situations where the nature of the investment opportunity identified is highly time-dependent. The Firm is generally a long-term investor, but will occasionally engage in opportunistic trading that may require faster execution in order to take advantage of the available opportunity within the market. Price will still usually be a high priority factor in this situation, as it will be the potential for the price to move against the Firm over a short time period that results in the need to execute the trade quickly.

3.5 Overseas or hard to access markets

In relation to investments in certain overseas or otherwise hard-to-access markets, the geographic location and sector-specific expertise of the broker may become of paramount importance. In this situation, it is likely that the choice of counterparties will be limited, and while the Firm will still focus on achieving the best possible result for the client, this situation may lead to higher costs or a wider spread being obtained than would normally be the case.

3.6 Counterparty exposure

On occasion, it may be necessary to alter the method of execution in order to manage the exposure of the Firm to a particular counterparty. This may be necessary either for general risk management purposes, as the exposure is deemed to be too concentrated, or due to a change in credit rating of a particular counterparty or other market events that lead the Firm to want to reduce its exposure. This may on occasion result in a trade being executed with counterparty other than the one that appeared to be offering the best price and cost.

3.7 Execution only clients (client order handling)

In limited situations, where clients are execution only clients, the Firm needs to ensure that the execution of orders from these clients is prompt, fair and expeditious, relative to other orders or the trading interests of the firm. The Firm must ensure that execution of otherwise comparable orders is in accordance with the time of their reception by the Firm and are carried out sequentially and promptly unless the characteristics of the order. This section should be read in conjunction with the "Aggregation and Allocation" section of this Policy.

3.8 Regulatory compliance

There may also be other regulatory reasons why it is necessary to exclude certain counterparties from the pool of counterparties being considered for a particular transaction, regardless of the other terms that they are offering. This may be necessary for example to ensure that the Firm's obligations are fulfilled with respect to post-trade transparency or with respect to transaction reporting under MiFID II.

4 Governance and senior management oversight

4.1 The Best Execution Monitoring Committee

The Policy, the underlying trading arrangements in place to provide best execution to its clients, and the first and second line monitoring undertaken to demonstrate best execution is overseen by the Best Execution Monitoring Committee (the "Committee"). The Committee is led by the head of the portfolio management team and attended by representatives from the Firm's compliance and operations teams.

The Committee is responsible for ensuring that the Firm's internal policies and procedures deliver best execution, annually reviewing the Policy, monitoring the effectiveness of counterparties and Trading Venues and seeking to identify trends in execution quality or potential deficiencies in the Firm's processes to deliver continual improvement in the execution quality obtained for the Firm's clients.

4.2 Ongoing monitoring of execution quality (first line)

The ongoing monitoring of execution quality and 'first line' controls is undertaken by the Firm's portfolio management team. The first line of defence is therefore primarily responsible for ex ante and ex post monitoring of best execution on an ongoing basis, with oversight of this monitoring undertaken by senior management in the Firm's monthly compliance meeting.

The Firm's front-office staff receives training on the Firm's best execution obligations, policies and processes (including the Policy). Additionally, the Firm's portfolio management team has a suite of tools in order to assist in the delivery of best execution including pre-trade analytics and trading systems.

The First line review of execution quality will take place on a monthly basis, as well as ongoing monitoring occurring in real-time as the trading is taking place. The output of these monthly checks will be used in the second line monitoring described below.

4.3 Periodic monitoring of execution quality (second line)

Independent scrutiny of the first line's monitoring and review activities and output is carried out by business assurance as well as the Firm's compliance team as the 'second line of defence'. Oversight of the second line monitoring is undertaken by senior management in the Firm's monthly compliance meeting.

4.4 Review and oversight of Best Execution Policy

The Committee and Compliance will carry out a periodic review of the Policy (not less than annually) and prepare any necessary changes for presentation to and discussion at the Best Execution Committee meetings. The results of the periodic monitoring of execution quality described above in sections 4.2 and 4.3, as well as the periodic counterparty assessments undertaken by the Committee will feed in to this review. This will allow compliance to assess whether the Policy is being adhered to and whether the Policy itself is sufficient to deliver the best outcome for clients on a consistent basis.

The Committee will also consider as part of this review whether any changes made represent a 'material change' that needs to be notified to clients.

In addition, the head of the portfolio management team, as well as compliance will be responsible for identifying circumstances that require an ad hoc review and/or updates to the Policy to be made as and when these circumstances come to their attention.

Final approval of any updates of the Policy will be given by the Board of Directors of River and Mercantile Investments Limited.

5 Client communications and disclosures

5.1 Disclosure of appropriate information to clients

A copy of the Policy is available to clients on the Firm's website (https://solutions.riverandmercantile.com/index.php/best-execution-policy). The Firm maintains a copy of the Policy on its website which is available to clients. The Firm has made every effort to write this Policy in such a way as to meet the disclosure requirements, namely by providing sufficient details on how orders will be executed and writing it in a way that can be easily understood by clients.

5.2 Client consent to the Firm's execution policy

It is the Firm's policy to obtain explicit written consent from all clients to its execution policy. Appropriate information is provided on the Policy to all clients before clients give written consent to it through execution of an investment management agreement.

Since the Firm executes client orders outside of a Trading Venue, explicit consent is also received from the client.

5.3 Notification of material changes

Any material changes that are made to the Policy will be notified to clients. Where changes are made, in the ordinary course compliance will consider, as part of their review, whether the changes are material enough to require notification to clients. As a general rule, the addition or removal of a broker from the list of approved counterparties is not considered a material change and will not require specific notification to clients. Examples of material changes are likely to be the Firm starting to trade a new type of instrument that requires new and different execution arrangements to be put in place, or substantial changes to the Firm's existing execution arrangements.

5.4 Specific client instructions

If the Firm receives an order from a client that includes specific instructions in relation to the handling and execution of the order (such as requesting a particular Trading Venue, specifying a particular price or time or requesting the use of a particular strategy) then, subject to our legal and regulatory obligations, the Firm will execute the client's order in accordance with these specific instructions. This means that to the extent of the specific instructions, the Firm's obligation of best execution will be satisfied by executing the order in accordance with the specific instructions.

Where a specific instruction covers only a portion of an order (for example, as to the choice of venue), and the Firm have discretion over the other elements of the order, then the Firm will continue to owe an obligation of best execution in respect of the remaining elements of the order that are not covered by the specific instruction.

5.5 Disclosure of inducements, conflicts and fees

The Firm is required to maintain a Conflicts of Interest Policy identifying the circumstances that constitute or may cause a conflict of interest with potential material risk or damage to the interests of one or more of its clients. The Conflicts of Interest Policy in place outlines the procedure that the Firm will follow to manage such conflicts. This requirement applies to potential conflicts of interest that may arise between the Firm and its clients as a result of its execution arrangements which could prevent it from satisfying its best execution obligations. A copy of the Conflicts of Interest Policy is available on the Firm's website (http://riverandmercantile.com/about_the_group/corporate_governance).

The Firm is not permitted to receive any benefit for routing client orders to a particular trading or Trading Venue as this could be considered an inducement and conflict of interest. Payment for order flow is also therefore prohibited and the Firm does not engage in this practice.

5.6 Demonstrating best execution to clients and the FCA

The Firm is obliged by FCA rules[9] to be able to demonstrate to clients, on request, that all trades have been executed in accordance with this Policy. This obligation does not generally extend to the underlying investors in any fund although such information can be provided to them upon request at the Firm's discretion. It does however extend to the fund board, which should be considered the Firm's client for these purposes.

In relation to MiFID business only there is a further new requirement[10] that the Firm must be able to demonstrate to the FCA, upon request, that best execution has been achieved. This requirement goes beyond just demonstration that the execution policy has been adhered to.

The Firm considers that this Policy, along with the detailed monitoring of execution quality undertaken and the reports escalated to and ratified by compliance are sufficient to demonstrate the Firm's adherence to this Policy and to demonstrate more widely that the Firm has taken all sufficient steps to provide best execution to its clients and that this has been delivered on a consistent basis.

[9] COBS 11.2A.32 for MiFID business
[10] COBS 11.2A.32

Appendix 1 – Classes of Financial Instrument as per Annex 1 of RTS 28	**DIRECT EXECUTION:** Firm executes trades in this instrument directly	**INDIRECT EXECUTION:** Firm transmits orders in this instrument to counterparties execute	**NOT APPLICABLE:** Firm does not trade in this instrument
(a) Equities – Shares & Depositary Receipts			
(i) Tick size liquidity bands 5 and 6 (from 2000 trades per day)			X
(ii) Tick size liquidity bands 3 and 4 (from 80 to 1999 trades per day)			X
(iii) Tick size liquidity band 1 and 2 (from 0 to 79 trades per day)			X
(b) Debt instruments			
(i) Bonds	X	X	
(ii) Money markets instruments			X
(c) Interest rates derivatives			
(i) Futures and options admitted to trading on a Trading Venue			X
(ii) Swaps, forwards, and other interest rates derivatives			X
(d) credit derivatives			
(i) Futures and options admitted to trading on a Trading Venue			X
(ii) Other credit derivatives			X
(e) currency derivatives			
(i) Futures and options admitted to trading on a Trading Venue			X
(ii) Swaps, forwards, and other currency derivatives	X	X	
(f) Structured finance instruments			X
(g) Equity Derivatives			
(i) Options and Futures admitted to trading on a Trading Venue			X

(ii) Swaps and other equity derivatives			X
(h) Securitized Derivatives			
(i) Warrants and Certificate Derivatives			X
(ii) Other securitized derivatives			X
(i) Commodities derivatives and emission allowances Derivatives			
(i) Options and Futures admitted to trading on a Trading Venue			X
(ii) Other commodities derivatives and emission allowances derivatives			X
(j) Contracts for difference			X
(k) Exchange traded products (Exchange traded funds, exchange traded notes and exchange traded commodities)	X	X	
(l) Emission allowances			X
(m) Other MiFID II instruments:			
(i) Units in Collective Investment Schemes	X		
(n) Other instruments outside the scope of MiFID II:			
(i) FX Spot	X	X	

Appendix 2 – List of Trading Venues and Counterparties on which significant reliance is placed	**TRADING VENUES:**	**COUNTERPARTIES:**
(a) Equities – Shares & Depositary Receipts		
(b) Debt instruments		
	TradeWeb	Lloyds Bank Corporate Markets plc
		NatWest Markets Plc
		BNP Paribas SA London
		Goldman Sachs International
		Deutsche Bank AG, London
		Morgan Stanley & Co.
		JP Morgan Securities plc
		Citigroup Global Markets
		HSBC Bank plc
		Bank of America Merrill Lynch International Limited
		Barclays Bank Plc
		RBC Europe Limited
(c) Interest rates derivatives		
(d) credit derivatives		
(e) currency derivatives		
	FX Connect	Lloyds Bank Corporate
		NatWest Markets Plc
		Credit Suisse

		Barclays Bank Plc
(f) Structured finance instruments		
(g) Equity Derivatives		
(h) Securitized Derivatives		
(i) Commodities derivatives and emission allowances Derivatives		
(j) Contracts for difference		
(k) Exchange traded products (Exchange traded funds, exchange traded notes and exchange traded commodities)		
	TradeWeb	BNP Paribas SA London
		BNP Paribas Security Corp
		Goldman Sachs International
		Deutsche Bank AG London
		Societe Generale London Branch Societe Generale Americas Securities
		Flow Traders b.v.
		Susquehanna International Securities
		Barclays Capital Securities Limited Barclays Capital Inc
		Optiver V.O.F.
		IMC Trading B.V.
		Citadel Securities LLC

		Jane Street Execution Services LLC Jane Street Financial Limited
(l) Emission allowances		

(m) Other MiFID II instruments:		
(i) Units in Collective Investment Schemes		N/A
(n) Other instruments outside the scope of MiFID II:		
(i) FX Spot	FX Connect	Lloyds Bank Corporate Markets plc
	Bloomberg MTF	NatWest
		Credit Suisse
		Barclays Bank Plc
		CACEIS
		BBH
		BNP Paribas SA