

Execution Quality Report

Period from	01 January 2020
Period to	31 December 2020
River and Mercantile Group Division	River and Mercantile Asset Management LLP
Legal Entity Identifier	213800HIGHFCAY9K8Z97

Introduction

This report covers the activities of River and Mercantile Asset Management LLP (**RAMAM**) which is a subsidiary of River and Mercantile Group Plc. This report has been prepared for the purposes of Regulatory Technical Standard 28 (**RTS 28**) supplementing Directive 2014/65/EU (**MiFID II**) and covers the period between 1 January 2020 and 31 December 2020, inclusive (**the Relevant Period**).

This report sets out information on the identity of RAMAM's top five execution venues and counterparties for the Relevant Period as well as the quality of execution achieved for clients.

Pursuant to MiFID II RAMAM trades as a Professional Client and on an agency basis for its clients (and does not deal as principal), so no information relating to retail activities is provided.

Top 5 Execution Venues

A. Equities – Shares & Depositary Receipts

I. Tick size liquidity bands 5 and 6 (from 2000 trades per day)

Class of Instrument		Equity - Shares & Depositary Receipts Liquidity Bands 5-6		
<1 Average trade per business day		N		
Top 5 Counterparties ranked in terms of trading volumes		Volume Traded (%)	Proportion of Orders Executed	Directed Trade (% Volume)
CITIGROUP GLOBAL MARKETS LIMITED	XKZZ2JZF41MRHTR1V493	15.82%	16.13%	0
UBS AG	BFM8T61CT2L1QCCEMIK50	13.97%	21.30%	0
JEFFERIES INTERNATIONAL LIMITED	S5THZMDUJCTQZBTRVI98	8.26%	8.33%	0
LIQUIDNET EUROPE LIMITED	213800ZIRB79BE5XQM68	7.57%	6.09%	0
CANACCORD GENUITY LIMITED	ZBU7V5V5NIMN4ILRFC23	5.34%	6.28%	0

II. Tick size liquidity bands 3 and 4 (from 80 to 1999 trades per day)

Class of Instrument		Equity - Shares & Depositary Receipts Liquidity Bands 3-4		
<1 Average trade per business day		N		
Top 5 Counterparties ranked in terms of trading volumes		Volume Traded (%)	Proportion of Orders Executed	Directed Trade (% Volume)
LIQUIDNET EUROPE LIMITED	213800ZIRB79BE5XQM68	13.48%	7.10%	0
NUMIS SECURITIES LIMITED	213800P3F4RT97WDSX47	8.49%	5.80%	0
PEEL HUNT LLP	5493007DWN0R4YBM4C84	7.45%	9.17%	0
CITIGROUP GLOBAL MARKETS LIMITED	XKZZ2JZF41MRHTR1V493	7.30%	7.51%	0
VIRTU ITG EUROPE LIMITED	213800EEC95PRUCEUP63	6.87%	4.96%	0

III. Tick size liquidity band 1 and 2 (from 0 to 79 trades per day)

Class of Instrument		Equity - Shares & Depositary Receipts Liquidity Bands 1-2		
<1 Average trade per business day		N		
Top 5 Counterparties ranked in terms of trading volumes		Volume Traded (%)	Proportion of Orders Executed	Directed Trade (% Volume)
UBS AG	BFM8T61CT2L1QCCEMIK50	16.49%	22.21%	0
CITIGROUP GLOBAL MARKETS LIMITED	XKZZ2JZF41MRHTR1V493	11.53%	8.91%	0
ATLANTIC EQUITIES LLP	213800327M9B4D9S1553	9.64%	4.96%	0
CLSA (UK)	213800VZMAGVIU2IIA72	8.10%	7.80%	0
HSBC BANK PLC	MP6I5ZYZBEU3UXPFYF54	5.57%	6.39%	0

Debt Instruments

Publication Date: April 2021

Information Classification: Public

Bonds

Class of Instrument		Debt Instruments - Bonds		
<1 Average trade per business day		Y		
Top 5 Counterparties ranked in terms of trading volumes		Volume Traded (%)	Proportion of Orders Executed	Directed Trade (% Volume)
CITIGROUP GLOBAL MARKETS LIMITED	XKZZ2JZF41MRHTR1V493	44.88%	46.33%	0
BARCLAYS BANK PLC	G5GSEF7VJP5I7OUK5573	24.49%	20.90%	0
MORGAN STANLEY & CO. INTERNATIONAL PLC	4PQUHN3JPFQFNF3BB653	14.32%	18.08%	0
J.P. MORGAN SECURITIES PLC	K6Q0W1PS1L1O4IQL9C32	11.70%	12.43%	0
BNY MELLON CAPITAL MARKETS EMEA LIMITED	213800O5FBGOWU89LN14	4.61%	2.26%	0

Interest Rate Derivatives

Futures and options admitted to trading on a trading venue

Class of Instrument		Interest rate derivatives - Futures and options admitted to trading on a trading venue		
<1 Average trade per business day		Y		
Top 5 Counterparties ranked in terms of trading volumes		Volume Traded (%)	Proportion of Orders Executed	Directed Trade (% Volume)
MORGAN STANLEY & CO. INTERNATIONAL PLC	4PQUHN3JPFQFNF3BB653	62.97%	61.36%	0
J.P. MORGAN SECURITIES PLC	K6Q0W1PS1L1O4IQL9C32	37.03%	38.64%	0

Currency Derivatives

Swaps, forwards, and other currency derivatives

Class of Instrument		Currency Derivatives - Swaps, forwards, and other currency derivatives		
<1 Average trade per business day		N		
Top 5 Counterparties ranked in terms of trading volumes		Volume Traded (%)	Proportion of Orders Executed	Directed Trade (% Volume)
The Bank of New York Mellon	HPFHU00Q28E4N0NFVK49	42.78%	22.99%	0
JPMorgan Chase Bank	7H6GLXDRUGQFU57RNE97	35.76%	36.41%	0
The Northern Trust Company	6PTKHDJ8HDUF78PFWH30	19.69%	37.67%	0
UBS AG	BFM8T61CT2L1QCEMIK50	1.77%	2.93%	0

Equity Derivatives

Options and Futures admitted to trading on a trading venue

Class of Instrument		Equity Derivatives - Options and Futures admitted to trading on a trading venue		
<1 Average trade per business day		Y		
Top 5 Counterparties ranked in terms of trading volumes		Volume Traded (%)	Proportion of Orders Executed	Directed Trade (% Volume)

MORGAN STANLEY & CO. INTERNATIONAL PLC	4PQUHN3JPFQFN3BB653	58.70%	64.23%	0
J.P. MORGAN SECURITIES PLC	K6Q0W1PS1L1O4IQL9C32	41.30%	35.77%	0

Swaps and other equity derivatives

Class of Instrument		Equity Derivatives - Swaps and other equity derivatives		
<1 Average trade per business day		Y		
Top 5 Counterparties ranked in terms of trading volumes		Volume Traded (%)	Proportion of Orders Executed	Directed Trade (% Volume)
J.P. Morgan Securities PLC	K6Q0W1PS1L1O4IQL9C32	50.56%	74.47%	0
Morgan Stanley & Co. International PLC	4PQUHN3JPFQFN3BB653	11.79%	17.73%	0
BARCLAYS BANK PLC	G5GSEF7VJP5I7OUK5573	37.65%	7.80%	0

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

Class of Instrument		Exchange Traded Products		
<1 Average trade per business day		Y		
Top 5 Counterparties ranked in terms of trading volumes		Volume Traded (%)	Proportion of Orders Executed	Directed Trade (% Volume)
CREDIT SUISSE SECURITIES (EUROPE) LIMITED	DL6FFRRLF74S01HE2M14	67.89%	41.98%	0
BARCLAYS CAPITAL SECURITIES LIMITED	K9WDOH4D2PYBSLSOB484	18.94%	10.69%	0
CLSA (UK)	213800VZMAGVIU2IJA72	2.64%	9.16%	0
JEFFERIES INTERNATIONAL LIMITED	S5THZMDUJCTQZBTRVI98	2.21%	9.92%	0

Other instruments

Equity – Shares & Depositary Receipts

Class of Instrument		Other Instruments Equity - Shares & Depositary Receipts falling outside FCA's tick size liquidity bands		
<1 Average trade per business day		N		
Top 5 Counterparties ranked in terms of trading volumes		Volume Traded (%)	Proportion of Orders Executed	Directed Trade (% Volume)
JEFFERIES INTERNATIONAL LIMITED	S5THZMDUJCTQZBTRVI98	15.60%	21.28%	0
UBS AG	BFM8T61CT2L1QCCEMIK50	15.27%	16.61%	0
CITIGROUP GLOBAL MARKETS LIMITED	XKZZ2JZF41MRHTR1V493	10.27%	6.77%	0
LIQUIDNET EUROPE LIMITED	213800ZIRB79BE5XQM68	5.62%	1.52%	0
ITAU BBA USA SECURITIES, INC.	5493008E85XK12EKYI22	5.48%	4.68%	0

Qualitative analysis and conclusion on the quality of execution obtained for the purpose of RTS 28

Equities – Shares and Depositary Receipts

RTS 28, Article 3(3)	
<p>(a) an explanation of the relative importance the firm gave to the execution factors of price, costs, speed, likelihood of execution or any other consideration including qualitative factors when assessing the quality of execution</p>	<p>RAMAM is required to ensure that the best possible result is obtained on a consistent basis whether directly executing or transmitting client orders to third parties for execution. What constitutes the best possible result varies depending on the relative importance given to the execution factors for the class of financial instrument executed.</p> <p>Price, costs, the likelihood of execution, latency, as well as settlement were given the most importance when executing transactions during the Relevant Period. The remaining execution factors such as; liquidity, size, as well as the nature of the order were also given consideration where orders were being executed in less liquid stocks, or the order represented a high proportion of the daily volume (measured over various periods).</p> <p>Other relevant considerations included clients' specific instructions.</p>
<p>(b) a description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders</p>	<p>RAMAM had no close links with, or common ownership of any execution venue or counterparty in the Relevant Period. There were no conflicts of interest with venues or counterparties which impacted RAMAM's ability to deliver best execution for its clients.</p> <p>RAMAM does not receive payments, discounts, rebates, or non-monetary benefits with regards to its trading arrangements. RAMAM has adopted processes that demonstrate careful consideration and control around execution and research costs. RAMAM has undertaken to pay for research costs post MiFID II.</p>
<p>(c) a description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received</p>	<p>'No changes were made to RAMAM's approved list of venues and counterparties during the Relevant Period'</p>
<p>(d) an explanation of the factors that led to a change in the list of execution venues listed in the firm's execution policy, if such a change occurred</p>	
<p>(e) an explanation of how order execution differs according to client categorisation, where the firm treats categories of clients differently and where it may affect the order execution arrangements</p>	<p>RAMAM trades as a Professional Client and on an agency basis for its clients. RAMAM does not treat categories of clients differently.</p>
<p>(f) an explanation of whether other criteria were given precedence over immediate price and cost when executing retail client orders and how these other criteria were instrumental in delivering the best possible result in terms of the total consideration to the client</p>	
<p>(g) an explanation of how the investment firm has used any data or tools relating to the quality of execution, including any data published under Commission Delegated Regulation (EU) 2017/575</p>	<p>RAMAM has used independent TCA (transaction cost analysis) providers to assist with the firm's monitoring of best execution.</p>
<p>(h) Where applicable, an explanation of how the investment firm has used output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU.</p>	<p>This is not applicable, as there were no consolidated tape providers (CTPs) during the Relevant Period.</p>

Debt Instruments – Bonds

RTS 28, Article 3(3) Reference	
<p>(a) an explanation of the relative importance the firm gave to the execution factors of price, costs, speed, likelihood of execution or any other consideration including qualitative factors when assessing the quality of execution</p>	<p>When executing transactions in liquid instruments, the ranking of the Execution Factors is typically as follows:</p> <ul style="list-style-type: none"> ▪ Price ▪ Costs ▪ Speed ▪ Likelihood execution <p>Consideration is also given to any governing documentation which is in place.</p>
<p>(b) a description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders</p>	<p>RAMAM does not receive payments, discounts, rebates, or non-monetary benefits in regard to its trading arrangements.</p>
<p>(c) a description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received</p>	
<p>(d) an explanation of the factors that led to a change in the list of execution venues listed in the firm's execution policy, if such a change occurred</p>	<p>No changes were made to RAMAM's approved list of venues and counterparties during the Relevant Period</p>
<p>(e) an explanation of how order execution differs according to client categorisation, where the firm treats categories of clients differently and where it may affect the order execution arrangements</p>	<p>RAMAM trades as a Professional Client and on an agency basis for its clients. Order execution does not differ across different categories of clients.</p>
<p>(f) an explanation of whether other criteria were given precedence over immediate price and cost when executing retail client orders and how these other criteria were instrumental in delivering the best possible result in terms of the total consideration to the client</p>	
<p>(g) an explanation of how the investment firm has used any data or tools relating to the quality of execution, including any data published under Commission Delegated Regulation (EU) 2017/575</p>	<p>RAMAM uses quantitative and qualitative data such as; live price feeds at the time of trading as well as best execution reports from venues to monitor the quality of its execution.</p>
<p>(h) Where applicable, an explanation of how the investment firm has used output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU.</p>	<p>This is not applicable, as there were no consolidated tape providers (CTPs) during the Relevant Period</p>

Interest Rate Derivatives - Futures and Options admitted to trading on a trading venue

RTS 28, Article 3(3) Reference	
<p>(a) an explanation of the relative importance the firm gave to the execution factors of price, costs, speed, likelihood of execution or any other consideration including qualitative factors when assessing the quality of execution</p>	<p>When executing transactions in liquid instruments, the ranking of the Execution Factors is typically as follows:</p> <ul style="list-style-type: none"> ▪ Price ▪ Costs ▪ Speed ▪ Likelihood execution <p>Consideration is also given to any governing documentation which is in place.</p>
<p>(b) a description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders</p>	<p>RAMAM does not receive payments, discounts, rebates, or non-monetary benefits with regards to its trading arrangements.</p>
<p>(c) a description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received</p>	
<p>(d) an explanation of the factors that led to a change in the list of execution venues listed in the firm's execution policy, if such a change occurred</p>	<p>No changes were made to RAMAM's approved list of venues and counterparties during the Relevant Period</p>
<p>(e) an explanation of how order execution differs according to client categorisation, where the firm treats categories of clients differently and where it may affect the order execution arrangements</p>	<p>RAMAM trades as a Professional Client and on an agency basis for its clients. Order execution does not differ across different categories of clients.</p>
<p>(f) an explanation of whether other criteria were given precedence over immediate price and cost when executing retail client orders and how these other criteria were instrumental in delivering the best possible result in terms of the total consideration to the client</p>	
<p>(g) an explanation of how the investment firm has used any data or tools relating to the quality of execution, including any data published under Commission Delegated Regulation (EU) 2017/575</p>	<p>RAMAM uses quantitative and qualitative data such as; live price feeds at the time of trading as well as best execution reports from venues to monitor the quality of its execution.</p>
<p>(h) Where applicable, an explanation of how the investment firm has used output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU.</p>	<p>This is not applicable, as there were no consolidated tape providers (CTPs) during the Relevant Period</p>

Exchange Traded Securities

RTS 28, Article 3(3)	
(a) an explanation of the relative importance the firm gave to the execution factors of price, costs, speed, likelihood of execution or any other consideration including qualitative factors when assessing the quality of execution	<p>RAMAM is required to ensure that the best possible result is obtained on a consistent basis whether directly executing or transmitting client orders to third parties for execution. What constitutes the best possible result varies depending on the relative importance given to the execution factors for the class of financial instrument executed.</p> <p>Price, costs, the likelihood of execution, latency, as well as settlement were given the most importance when executing transactions during the Relevant Period. The remaining execution factors such as; liquidity, size, as well as the nature of the order were also given consideration where orders were being executed in less liquid stocks, or the order represented a high proportion of the daily volume (measured over various periods).</p> <p>Other relevant considerations included clients' specific instructions.</p>
(b) a description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders	<p>RAMAM had no close links with, or common ownership of any execution venue or counterparty in the Relevant Period. There were no conflicts of interest with venues or counterparties which impacted RAMAM's ability to deliver best execution for its clients.</p> <p>RAMAM does not receive payments, discounts, rebates, or non-monetary benefits with regards to its trading arrangements. RAMAM has adopted processes that demonstrate careful consideration and control around execution and research costs. RAMAM has undertaken to pay for research costs post MiFID II.</p>
(c) a description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received	<p>'No changes were made to RAMAM's approved list of venues and counterparties during the Relevant Period'</p>
(d) an explanation of the factors that led to a change in the list of execution venues listed in the firm's execution policy, if such a change occurred	
(e) an explanation of how order execution differs according to client categorisation, where the firm treats categories of clients differently and where it may affect the order execution arrangements	<p>RAMAM trades as a Professional Client and on an agency basis for its clients. RAMAM does not treat categories of clients differently.</p>
(f) an explanation of whether other criteria were given precedence over immediate price and cost when executing retail client orders and how these other criteria were instrumental in delivering the best possible result in terms of the total consideration to the client	
(g) an explanation of how the investment firm has used any data or tools relating to the quality of execution, including any data published under Commission Delegated Regulation (EU) 2017/575	<p>RAMAM has used independent TCA (transaction cost analysis) providers to assist with the firm's monitoring of best execution.</p>
(h) Where applicable, an explanation of how the investment firm has used output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU.	<p>This is not applicable, as there were no consolidated tape providers (CTPs) during the Relevant Period.</p>

▪ **Currency Derivatives - Swaps, forwards, and other currency derivatives**

RTS 28, Article 3(3) Reference	
(a) an explanation of the relative importance the firm gave to the execution factors of price, costs, speed, likelihood of execution or any other consideration including qualitative factors when assessing the quality of execution	<p>In accordance with RAMAM's Best Execution Policy, the ranking of the Execution Factors is typically as follows:</p> <ul style="list-style-type: none"> ▪ Price ▪ Likelihood of execution and settlement ▪ Costs - implicit and explicit ▪ Liquidity and size ▪ Speed / latency <p>RAMAM executed transactions in highly liquid currency derivatives, directly on a Multilateral Trading Facility and as such price was given the highest importance.</p>
(b) a description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders	RAMAM had no close links with, or common ownership of any execution venue or counterparty in the Relevant Period. There were no conflicts of interest with venues or counterparties which impacted on RAMAM's ability to deliver best execution for its clients.
(c) a description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received	RAMAM does not receive payments, discounts, rebates, or non-monetary benefits with regards to its trading arrangements.
(d) an explanation of the factors that led to a change in the list of execution venues listed in the firm's execution policy, if such a change occurred	No changes were made to RAMAM's approved list of venues and counterparties during the Relevant Period.
(e) an explanation of how order execution differs according to client categorisation, where the firm treats categories of clients differently and where it may affect the order execution arrangements	RAMAM had no close links with, or common ownership of any execution venue or counterparty in the Relevant Period. There were no conflicts of interest with venues or counterparties which impacted on RAMAM's ability to deliver best execution for its clients.
(f) an explanation of whether other criteria were given precedence over immediate price and cost when executing retail client orders and how these other criteria were instrumental in delivering the best possible result in terms of the total consideration to the client	RAMAM trades as a Professional Client and on an agency basis for its clients. Order execution does not differ across different categories of clients.
(g) an explanation of how the investment firm has used any data or tools relating to the quality of execution, including any data published under Commission Delegated Regulation (EU) 2017/575	Transactions are monitored by using Transaction Cost Analysis reports from MTF venue FXALL, to ensure best prices are achieved from competing quotes, and counterparty performance.
(h) Where applicable, an explanation of how the investment firm has used output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU.	This is not applicable, as there were no consolidated tape providers (CTPs) during the Relevant Period

▪ **Equity Derivatives – Swaps and other equity derivatives**

RTS 28, Article 3(3) Reference	
(a) an explanation of the relative importance the firm gave to the execution factors of price, costs, speed, likelihood of execution or any other consideration including qualitative factors when assessing the quality of execution	<p>When executing transactions in liquid instruments, the ranking of the Execution Factors is typically as follows:</p> <ul style="list-style-type: none"> ▪ Price ▪ Costs ▪ Speed ▪ Likelihood execution <p>Consideration is also given to any governing documentation which is in place.</p>
(b) a description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders	RAMAM does not receive payments, discounts, rebates, or non-monetary benefits with regards to its trading arrangements.
(c) a description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received	
(d) an explanation of the factors that led to a change in the list of execution venues listed in the firm's execution policy, if such a change occurred	No changes were made to RAMAM's approved list of venues and counterparties during the Relevant Period
(e) an explanation of how order execution differs according to client categorisation, where the firm treats categories of clients differently and where it may affect the order execution arrangements	RAMAM trades as a Professional Client and on an agency basis for its clients. Order execution does not differ across different categories of clients.
(f) an explanation of whether other criteria were given precedence over immediate price and cost when executing retail client orders and how these other criteria were instrumental in delivering the best possible result in terms of the total consideration to the client	
(g) an explanation of how the investment firm has used any data or tools relating to the quality of execution, including any data published under Commission Delegated Regulation (EU) 2017/575	RAMAM uses quantitative and qualitative data such as; live price feeds at the time of trading as well as best execution reports from venues to monitor the quality of its execution.
(h) Where applicable, an explanation of how the investment firm has used output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU.	This is not applicable, as there were no consolidated tape providers (CTPs) during the Relevant Period