

### OVERVIEW

Following implementation of the Markets in Financial Instruments Directive (MiFID II), investment firms are required to publish their Top 5 Execution Venues in terms of trading volumes (value of trades) and number of trades per Class of Financial Instruments on an annual basis.

The European Supervision and Markets Authority (ESMA) has defined thirteen different asset classes. Some classes are further divided into sub-classes.

A full list of the investment classes are listed below:

- Equities
- Debt Instruments
- Interest Rate Derivatives
- Credit Derivatives
- Currency Derivatives
- Structured Finance Instruments
- Equity Derivatives
- Securitized Derivatives
- Commodities Derivatives
- Contracts for Difference
- Exchange Traded Products
- Emission Allowances
- Other Instruments

MiFID II also requires investment firms to publish a separate Top 5 report depending on whether the execution venues were used for:

- Professional Client Orders
- Retail Client Orders

It should be noted that Tacit Investment Management does not trade in all of these asset classes and all its clients are classified as 'Retail Clients' which will result in fewer reports.

### 2018 PUBLICATION

ESMA has recognised that for the first set of reports, investment firms may not be able to fully report on information which is not available or applicable in relation to the preceding year. As a practical matter, this means that the first year's report lacks some of the detail that will be available for subsequent reports.

### REPORT GUIDE

Top 5 reports will display the Execution Venue name, the information on the total volume (value of trades) and the number of trades as a percentage of all Client Orders executed on that Execution Venue in that Class of Financial Instrument, as well as a confirmation of whether the platform / custodian has executed an average of less than one trade per business day in the previous year in that Class of Financial Instrument.

For the reports regarding Professional and Retail Client Orders, additional content needs to be provided:

- Class of Financial Instrument covered
- Percentage of Passive and Aggressive Orders
- Percentage of Directed Orders

A Passive Order is characterised as an order that is entered into the order book of a trading venue and provides liquidity, whereas an Aggressive Order is defined as an order that is entered into the order book of a trading venue and removes liquidity.

The conditions of a Directed Order are met, when a specific Execution Venue was specified by the client prior to the execution of the order.

### MONITORING AND REVIEW

We receive best execution and venue reports from each of our direct client third party platforms / custodians which to assists with the analysis of the quality and cost of execution. This is scrutinised to ensure adherence to our policy and any transactions falling outside the normal market price at the time the transaction was executed are investigated.

For the Collective Investment Schemes (CIS), there is no secondary market, therefore execution of purchases or sales will be done directly with the operator, manager or administrator of the Fund. The counterparty for such transactions would therefore always be the operator, manager or administrator.

Transactions are affected by either;

- the Net Asset Value of the CIS or
- Bid-Offer of the CIS where applicable

Certainty of execution (i.e. the ability to execute the order) is the most important factor, which will be defined in the prospectus of the target fund.

### RAYMOND JAMES INVESTMENT SERVICES

#### 2017 TOP 5 EXECUTION VENUES BY VOLUME

CLASS OF FINANCIAL INSTRUMENT		Equities – Shares & Depositary Receipts			PERIOD START	PERIOD END
MIFID LL EXECUTION TYPE		Execution			1/1/2017	31/12/2017
NOTIFICATION IF <1 AVERAGE TRADE PER BUSINESS DAY IN THE PREVIOUS YEAR		No			CLIENT TYPE	
		PROPORTION OF VOLUME TRADED AS A % OF TOTAL IN THAT CLASS	PROPORTION OF VOLUME TRADED AS A % OF TOTAL IN THAT CLASS	% OF PASSIVE ORDERS	% OF AGGRESSIVE ORDERS	% OF DIRECTED ORDERS
1	Peel Hunt LLP (LEI:5493007DWN0R4YBM4C84)	18.41%	13.31%	0	0	0
2	Winterflood Securities Limited (LEI:8BRUP6V1DX3PIG2R0745)	16.97%	31.58%	0	0	0
3	Stifel Nicolaus Europe Limited (LEI:213800BVEFNZ8UYPKL03)	14.98%	3.86%	0	0	0
4	Instinet Europe Limited (LEI:213800MXAKR2LA1VBM44)	8.64%	8.60%	0	0	0
5	KCG Europe Limited (LEI:549300346EFUPFCXJT79)	8.44%	12.56%	0	0	0

CLASS OF FINANCIAL INSTRUMENT		Exchange Traded Products			PERIOD START	PERIOD END
MIFID LL EXECUTION TYPE		Execution			1/1/2017	31/12/2017
NOTIFICATION IF <1 AVERAGE TRADE PER BUSINESS DAY IN THE PREVIOUS YEAR		No			CLIENT TYPE	
		PROPORTION OF VOLUME TRADED AS A % OF TOTAL IN THAT CLASS	PROPORTION OF VOLUME TRADED AS A % OF TOTAL IN THAT CLASS	% OF PASSIVE ORDERS	% OF AGGRESSIVE ORDERS	% OF DIRECTED ORDERS
1	Flow Traders BV (LEI:549300CLJ19XDH12XV51)	17.71%	18.15%	0	0	0
2	Winterflood Securities Limited (LEI:8BRUP6V1DX3PIG2R0745)	13.43%	20.83%	0	0	0
3	RBC Europe Limited (LEI:TXDSU46SXBWIGJ8G8E98)	12.28%	18.91%	0	0	0
4	Susquehanna International Securities Limited (LEI:635400IAV22ZOU1NFS89)	10.30%	14.54%	0	0	0
5	Peel Hunt LLP (LEI:5493007DWN0R4YBM4C84)	9.67%	7.19%	0	0	0

CLASS OF FINANCIAL INSTRUMENT					PERIOD START	PERIOD END
		Debt Instruments – Bonds				
MIFID LL EXECUTION TYPE		Execution			1/1/2017	31/12/2017
NOTIFICATION IF <1 AVERAGE TRADE PER BUSINESS DAY IN THE PREVIOUS YEAR		No			CLIENT TYPE	
					Retail	
		PROPORTION OF VOLUME TRADED AS A % OF TOTAL IN THAT CLASS	PROPORTION OF VOLUME TRADED AS A % OF TOTAL IN THAT CLASS	% OF PASSIVE ORDERS	% OF AGGRESSIVE ORDERS	% OF DIRECTED ORDERS
1	Winterflood Securities Limited (LEI:8BRUP6V1DX3PIG2R0745)	18.20%	44.67%	0	0	0
2	NCL Investments Limited (LEI:D2F0VEF263OY4T3YK397)	16.90%	5.93%	0	0	0
3	BGC Brokers L.P (LEI:ZWNFQ48RUL8VJZ2AIC12)	8.74%	3.69%	0	0	0
4	RIA Capital Markets Limited (LEI:213800ZO2PQP43WCZ92)	6.99%	1.47%	0	0	0
5	Peel Hunt LLP (LEI:5493007DWN0R4YBM4C84)	6.57%	11.72%	0	0	0

CLASS OF FINANCIAL INSTRUMENT					PERIOD START	PERIOD END
		Structured Finance Instruments				
MIFID LL EXECUTION TYPE		Execution			1/1/2017	31/12/2017
NOTIFICATION IF <1 AVERAGE TRADE PER BUSINESS DAY IN THE PREVIOUS YEAR		No			CLIENT TYPE	
					Retail	
		PROPORTION OF VOLUME TRADED AS A % OF TOTAL IN THAT CLASS	PROPORTION OF VOLUME TRADED AS A % OF TOTAL IN THAT CLASS	% OF PASSIVE ORDERS	% OF AGGRESSIVE ORDERS	% OF DIRECTED ORDERS
1	JP Morgan Securities Limited (LEI:K6Q0W1PS1L1O4IQL9C32)	34.62%	10.70%	0	0	0
2	Investec Bank (UK) Limited (LEI:84S0VF8TSMH0T6D4K848)	31.25%	68.27%	0	0	0
3	SG Option Europe (LEI:969500FDN8G43HMHZM83)	30.25%	9.59%	0	0	0
4	BNP Paribas Arbitrage SNC (LEI:6EWKU0FGVX5QQJHFGT48)	1.86%	1.48%	0	0	0
5	Credit Suisse Securities (Europe) Limited (LEI:DL6FFRRLF74S01HE2M14)	1.05%	4.06%	0	0	0

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