

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.

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

2019 TOP 5 EXECUTION VENUES BY VOLUME

CLASS OF FINANCIAL INSTRUMENT		Equities - Shares & Depositary Receipts (T12)			PERIOD START	PERIOD END
MIFID LL EXECUTION TYPE		Execution			1/1/2019	31/12/2019
NOTIFICATION IF <1 AVERAGE TRADE PER BUSINESS DAY IN THE PREVIOUS YEAR		No			CLIENT TYPE	Interaction
		PROPORTION OF VOLUME TRADED AS A % OF TOTAL IN THAT CLASS	PROPORTION OF ORDERS TRADED AS A % OF TOTAL IN THAT CLASS	% OF PASSIVE ORDERS	% OF AGGRESSIVE ORDERS	% OF DIRECTED ORDERS
1	PEEL HUNT LLP 5493007DWN0R4YBM4C84	15.92	21.61	2.91	45.53	0
2	WINTERFLOOD SECURITIES LTD 8BRUP6V1DX3PIG2R0745	14.84	20.85	3.5	56.82	0
3	NUMIS SECURITIES LIMITED 213800P3F4RT97WDSX47	13.84	6.99	7.83	36.99	0
4	STIFEL NICOLAUS EUROPE LIMITED 213800BVEFNZ8UYPKL03	8.25	6.34	9.22	42.38	0
5	CANTOR FITZGERALD 549300KM6VUHPKQLQX53	7.59	5.01	1.82	46.29	0

CLASS OF FINANCIAL INSTRUMENT		Equities - Shares & Depositary Receipts (T34)			PERIOD START	PERIOD END
MIFID LL EXECUTION TYPE		Execution			1/1/2019	31/12/2019
NOTIFICATION IF <1 AVERAGE TRADE PER BUSINESS DAY IN THE PREVIOUS YEAR		No			CLIENT TYPE	Interaction
		PROPORTION OF VOLUME TRADED AS A % OF TOTAL IN THAT CLASS	PROPORTION OF ORDERS TRADED AS A % OF TOTAL IN THAT CLASS	% OF PASSIVE ORDERS	% OF AGGRESSIVE ORDERS	% OF DIRECTED ORDERS
1	STIFEL NICOLAUS EUROPE LIMITED 213800BVEFNZ8UYPKL03	26.01	11.26	16	51.12	0
2	WINTERFLOOD SECURITIES LTD 8BRUP6V1DX3PIG2R0745	19.83	23.85	2.58	53.06	0
3	PEEL HUNT LLP 5493007DWN0R4YBM4C84	19.68	29.26	2	44.52	0
4	NUMIS SECURITIES LIMITED 213800P3F4RT97WDSX47	9.52	8.31	8.4	30.11	0
5	CENKOS SECURITIES LIMITED 213800ALVRC52VN3I821	4.85	3.59	3.13	45.14	0

CLASS OF FINANCIAL INSTRUMENT		Equities - Shares & Depositary Receipts (T56)			PERIOD START	PERIOD END
MIFID LL EXECUTION TYPE		Execution			1/1/2019	31/12/2019
NOTIFICATION IF <1 AVERAGE TRADE PER BUSINESS DAY IN THE PREVIOUS YEAR		No			CLIENT TYPE	Interaction
		PROPORTION OF VOLUME TRADED AS A % OF TOTAL IN THAT CLASS	PROPORTION OF ORDERS TRADED AS A % OF TOTAL IN THAT CLASS	% OF PASSIVE ORDERS	% OF AGGRESSIVE ORDERS	% OF DIRECTED ORDERS
1	STIFEL NICOLAUS EUROPE LIMITED 213800BVEFNZ8UYPKL03	35.68	6.66	17.65	69.91	0
2	PEEL HUNT LLP 5493007DWN0R4YBM4C84	23.32	20.93	5.24	39.37	0
3	INSTINET EUROPE LIMITED 213800MXAKR2LA1VBM44	15.58	34.03	4.33	68.59	0
4	WINTERFLOOD SECURITIES LTD 8BRUP6V1DX3PIG2R0745	13.09	28.18	4.16	34.01	0
5	COMMERZBANK AG CD39896 851WYGNLUQLFZBSYGB56	2.76	2.91	7.91	42.47	0

CLASS OF FINANCIAL INSTRUMENT	Exchange traded products (Exchange traded funds, exchange traded notes and exchange traded commodities)	PERIOD START	PERIOD END			
MIFID LL EXECUTION TYPE	Execution	1/1/2019	31/12/2019			
NOTIFICATION IF <1 AVERAGE TRADE PER BUSINESS DAY IN THE PREVIOUS YEAR	No	CLIENT TYPE	Interaction			
	PROPORTION OF VOLUME TRADED AS A % OF TOTAL IN THAT CLASS	PROPORTION OF ORDERS TRADED AS A % OF TOTAL IN THAT CLASS	% OF PASSIVE ORDERS			
		% OF AGGRESSIVE ORDERS	% OF DIRECTED ORDERS			
1	JANE STREET FINANCIAL LIMITED 549300ZHEHX8M31RP142	28.3	20.76	0.21	45.55	0
2	COMMERZBANK AG 851WYGNLUQLFZBSYGB56	21.49	25.07	4.87	36.57	0
3	FLOW TRADERS BV 549300CLJI9XDH12XV51	17.55	6.33	1.95	39.71	0
4	STIFEL NICOLAUS EUROPE LIMITED 213800BVEFNZ8UYPKL03	9.03	10.22	0.51	60.72	0
5	RBC EUROPE LIMITED TXDSU46SXBWIGJ8G8E98	5.25	13.69	0.16	72.27	0

CLASS OF FINANCIAL INSTRUMENT	Debt instruments, Bonds	PERIOD START	PERIOD END			
MIFID LL EXECUTION TYPE	Execution	1/1/2019	31/12/2019			
NOTIFICATION IF <1 AVERAGE TRADE PER BUSINESS DAY IN THE PREVIOUS YEAR	No	CLIENT TYPE	Interaction			
	PROPORTION OF VOLUME TRADED AS A % OF TOTAL IN THAT CLASS	PROPORTION OF ORDERS TRADED AS A % OF TOTAL IN THAT CLASS	% OF PASSIVE ORDERS			
		% OF AGGRESSIVE ORDERS	% OF DIRECTED ORDERS			
1	WINTERFLOOD SECURITIES LTD 8BRUP6V1DX3PIG2R0745	29.57	49.51	11.76	30.76	0
2	PEEL HUNT LLP 5493007DWN0R4YBM4C84	12.46	12.56	0.51	43.97	0
3	JANE STREET FINANCIAL LIMITED 549300ZHEHX8M31RP142	11.57	5.96	0.71	53.93	0
4	RIA CAPITAL MARKETS LIMITED 213800OZO2PQP43WCZ92	8.1	2.89	2.26	18.8	0
5	FLOW TRADERS BV 549300CLJI9XDH12XV51	5.72	3.3	1.29	41.29	0

CLASS OF FINANCIAL INSTRUMENT	Debt instruments, Money markets instruments	PERIOD START	PERIOD END			
MIFID LL EXECUTION TYPE	Execution	1/1/2019	31/12/2019			
NOTIFICATION IF <1 AVERAGE TRADE PER BUSINESS DAY IN THE PREVIOUS YEAR	Yes	CLIENT TYPE	Interaction			
	PROPORTION OF VOLUME TRADED AS A % OF TOTAL IN THAT CLASS	PROPORTION OF ORDERS TRADED AS A % OF TOTAL IN THAT CLASS	% OF PASSIVE ORDERS			
		% OF AGGRESSIVE ORDERS	% OF DIRECTED ORDERS			
1	PEEL HUNT LLP 5493007DWN0R4YBM4C84	52.89	61.18	0	80.77	0
2	WINTERFLOOD SECURITIES LTD 8BRUP6V1DX3PIG2R0745	28.01	18.82	0	81.25	0
3	CANACCORD GENUITY LIMITED ZBU7VFV5NIMN4ILRFC23	6.08	10.59	0	88.89	0
4	MORGAN STANLEY & CO. INTERNATIONAL PLC 4PQUHN3JPFQFNF3BB653	5.03	2.35	0	0	0
5	MORGAN STANLEY SECURITIES LIMITED VLR6T6E60GH5GUS0XX16	3.01	2.35	0	0	0

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CLASS OF FINANCIAL INSTRUMENT		Securitized Derivatives, Warrants and Certificate Derivatives			PERIOD START	PERIOD END
MIFID LL EXECUTION TYPE		Execution			1/1/2019	31/12/2019
NOTIFICATION IF <1 AVERAGE TRADE PER BUSINESS DAY IN THE PREVIOUS YEAR		Yes			CLIENT TYPE	Interaction
		PROPORTION OF VOLUME TRADED AS A % OF TOTAL IN THAT CLASS	PROPORTION OF ORDERS TRADED AS A % OF TOTAL IN THAT CLASS	% OF PASSIVE ORDERS	% OF AGGRESSIVE ORDERS	% OF DIRECTED ORDERS
1	CANTOR FITZGERALD EURO 549300KM6VUHPKQLQX53	94.05	50	0	100	0
2	WINTERFLOOD SECURITIES 8BRUP6V1DX3PIG2R0745	5.95	50	0	100	0
3						
4						
5						

CLASS OF FINANCIAL INSTRUMENT		Other instruments			PERIOD START	PERIOD END
MIFID LL EXECUTION TYPE		Execution			1/1/2019	31/12/2019
NOTIFICATION IF <1 AVERAGE TRADE PER BUSINESS DAY IN THE PREVIOUS YEAR		Yes			CLIENT TYPE	Interaction
		PROPORTION OF VOLUME TRADED AS A % OF TOTAL IN THAT CLASS	PROPORTION OF ORDERS TRADED AS A % OF TOTAL IN THAT CLASS	% OF PASSIVE ORDERS	% OF AGGRESSIVE ORDERS	% OF DIRECTED ORDERS
1	LIBERUM CAPITAL LTD 213800U6KUF87S1KCC03	37.47	1.53	0	0	0
2	JP MORGAN SECURITIES LTD K6Q0W1PS1L1O4IQL9C32	12.91	11.23	0	0	0
3	CSFB EQUITIES LIMITED DL6FFRRL74S01HE2M14	11.34	5.61	0	0	0
4	NATIXIS KX1WK48MPD4Y2NCUIZ63	9.4	3.57	0	0	0
5	CIBC WORLD MARKETS PLC BVRCO19C4GKNSAXXHE82	6.17	1.53	0	0	0

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