

Top Execution Venues by Volume

Note: Following the purchase of Hargreave Hale Limited (HHL) by Canaccord Genuity Wealth Management (CGWM) in 2017, HHL is now using the trading name CGWM along with two other companies in the group. Where CGWM is mentioned in the below paragraphs, this relates to trades completed by HHL and reference should be made to appropriate policies and procedures of HHL.

The Markets in Financial Instruments Directive 2014/65/EU (MIFID II) requires investment firms who execute client orders to summarise and make public on an annual basis, for each class of financial instruments, the top five execution venues in terms of trading volumes where they executed client orders in the preceding year.

The following reports have been published in accordance with the technical standards as described in the Commission Delegated Regulation EU/2017/576 (RTS 28) for all relevant financial instruments traded CGWM for the year 2017 with the exception of instruments traded on behalf of our fund management division when acting as investment advisor to unit trusts operated by Marlborough Fund Managers Limited. Different arrangements are in place for the execution of these trades and their inclusion in these tables could potentially mislead readers. Details of the arrangement for the unit trusts are available on request to relevant parties.

CGWM assigned a descending level of importance to the following factors, which were considered when executing an order: These were 'Price', 'Size', 'Likelihood of settlement', 'Cost of execution' and 'Speed of execution.' The criteria used when selecting a venue will have depended on the nature of the trade and the characteristics of the venue, for example when considering a choice of venue when executing a foreign trade. Prior to the purchase of HHL by CGWM, for a period in 2017, Investec Bank Plc owned approximately 35% of HHL. While we could select Investec as a counterparty to execute our trades, this did not affect our remuneration and was not a factor we would have considered when executing trades for our clients.

CGWM do not receive any payments, rebates or non-monetary benefits from any counterparties so these will not have been a consideration when executing trades on behalf of our clients. CGWM does not alter the order execution arrangements in respect of the category of client. The execution process for trades placed in collective funds where the fund manager is the only destination is not captured in the tables.

When considering the data presented in the tables, clients should also refer to the CGWM Order Execution Policy which is available under the HHL section of the company website.

CGWM regularly reviews counterparties it deals with and their financial position to ensure that counterparty risks are minimized. To ensure that we achieve best execution for our clients, CGWM has adopted a third party best execution tool to monitor execution trade by trade. Overall results for each counterparty are considered at least annually so would permit the company to adjust the company's execution policy if required. There have been no recent requirements to make any changes to our execution policy and CGWM remain satisfied with the service levels of trade execution achieved by the counterparties for each class of financial instrument highlighted within the tables below