

# CGMCTL best execution report

## Entities used for transmission of orders

Where we send investment applications or orders on your behalf to third parties (for example, to buy or sell investment holdings), we make every effort to ensure the best possible result for our clients. This is referred to as 'best execution'.

In arranging for the execution of your order we place the order via a platform (an online investment administration service) to execute your order.

We are obliged to disclose on an annual basis the top five investment firms that we send our client orders to.

The tables below relate to the period 1st January to 31st December 2018:

### Equities – shares and depositary receipts

Notification if less than 1 average trade per business day in the previous year: No – average trades more than 1 per day

<b>Top 5 venues ranked in terms of volume (descending order)</b>	<b>Proportion of volume transmitted, as a percentage of total in that class.</b> This is based on the monetary value of client orders.	<b>Proportion of volume transmitted, as a percentage of total in that class.</b> This is based on the number of client orders.
Raymond James (LEI 213800YR9S9QWX3WF904)	75.16%	60.47%
Transact (LEI 213800ZSEM CXQOTV1O47)	24.85%	39.28%
Nucleus (LEI 213800YJ6ICL35SXO583)	-0.01%	0.26%

For this type of investment we only sent orders to three firms.

### Debt instruments (e.g. government bonds)

Notification if less than 1 average trade per business day in the previous year: No – average trades more than 1 per day

<b>Top 5 venues ranked in terms of volume (descending order)</b>	<b>Proportion of volume transmitted, as a percentage of total in that class.</b> This is based on the monetary value of client orders.	<b>Proportion of volume transmitted, as a percentage of total in that class.</b> This is based on the number of client orders.
Raymond James (LEI 213800YR9S9QWX3WF904)	72.47%	55.79%
Transact (LEI 213800ZSEM CXQOTV1O47)	27.53%	44.21%

For this type of investment we only sent orders to two firms.

### Exchange Traded Products (e.g. Exchange Traded Funds)

Notification if less than 1 average trade per business day in the previous year: No – average trades more than 1 per day

<b>Top 5 venues ranked in terms of volume (descending order)</b>	<b>Proportion of volume transmitted, as a percentage of total in that class.</b> This is based on the monetary value of client orders.	<b>Proportion of volume transmitted, as a percentage of total in that class.</b> This is based on the number of client orders.
Raymond James (LEI 213800YR9S9QWX3WF904)	82.48%	64.37%
Transact (LEI 213800ZSEM CXQOTV1O47)	17.52%	35.63%

For this type of investment we only sent orders to two firms.

## Other Instruments (e.g. collective investments)

Notification if less than 1 average trade per business day in the previous year: No – average trades more than 1 per day

Top 5 venues ranked in terms of volume (descending order)	Proportion of volume transmitted, as a percentage of total in that class. This is based on the monetary value of client orders.	Proportion of volume transmitted, as a percentage of total in that class. This is based on the number of client orders.
Raymond James (LEI 213800YR9S9QWX3WF904)	57.89%	14.15%
Transact (LEI 213800ZSEMEXQOTV1O47)	40.33%	16.90%
Nucleus (LEI 213800YJ6ICL35SXO583)	1.78%	68.95%

For this type of investment we only sent orders to three firms.

### Issues identified

We undertake a robust settlement checking process to ensure all trades executed through the third party platforms settle efficiently and portfolios are updated in a timely manner. Throughout Q3 2018 we noticed a number of settlement delays on the RJIS platform, relating particularly to trades in the L&G UK Property Fund and the HSBC American Index Fund. Upon further investigation we were informed by RJIS that due to a systems glitch between the fund providers (L&G and HSBC) and Calastone (their in-house fund trading platform), trades were being placed manually rather than electronically. This resulted in delays to booking and settling trades as communication via paperwork slowed the process considerably. We have been assured this did not impact on trading dates and pricing and we have been closely monitoring the situation. We are comfortable that the manual process has not caused any material detriment to our clients.

### Monitoring and review

We operate in accordance with our best execution policy, which is reviewed at least annually. A copy of this policy is available upon request.

The third parties that we use also have responsibilities in relation to best execution and client order handling. We undertake periodic monitoring to make sure that they continue to meet our requirements.

Under the terms of our policy, we regularly research the third parties available to us to identify those that will enable us, on a consistent basis, to obtain the best possible result when arranging for the execution of your orders. This review is carried out at least annually or whenever a significant change occurs that we believe could affect our ability to continue to obtain the best possible results for our clients.

### Best execution monitoring

We make every effort to ensure the best possible result for our clients, on the assumption that total consideration (not just price) is the most important outcome, unless instructed otherwise. The execution factors we take into account include:

- price
- cost
- speed
- likelihood of execution and settlement
- size
- nature of the order and any other relevant consideration.

We undertake a quarterly monitoring process whereby 5% of transactions traded through a recognised investment exchange are reviewed, to ensure the platforms used are implementing best execution to our satisfaction and within the meaning of FCA and MiFID II regulations.

CGMCTL do not have any close links, conflicts of interests or common ownerships with respect to any of the firms that we pass client orders to.

There have been no changes to the platforms used during the period covered by this report.