

# RTS 28 report – Best Execution

For period ending 31<sup>st</sup> December 2018

*25<sup>th</sup> April 2019*

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

The top five 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 and the percentage of orders classified as Passive and Aggressive.

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.

Along with the above information, this report confirms whether Crown Agents Investment Management (CAIM) has executed an average of less than one trade per business day in the previous year in that Class of Financial Instrument.

# Class of Instrument: All Executed Orders

CAIM

Notification if <1 Average Trade per Business Day in the Previous Year

No

Top 5 Venues Ranked in terms of Volume (Descending Order)	Proportion of Volume Executed as a percentage of Total in that Class	Proportion of Orders Executed as a percentage of Total in that Class
Canadian Imperial Bank of Commerce 2IGI19DL77OX0HC3ZE78	12.20%	8.10%
Crown Agents Bank 21380011ZYMBN21SZ194	11.96%	4.72%
Toronto-Dominion Securities PT3QB789TSUIDF371261	9.56%	10.26%
Citigroup Global Markets Inc. XKZZ2JZF41MRHTR1V493	8.76%	11.18%
Shore Capital Stockbrokers Ltd. 2138009KZO3MK7TV6372	7.52%	7.49%

# Class of Instrument: Debt Instruments

CAIM

Notification if <1 Average Trade per Business Day in the Previous Year

No

Top Five Execution Venues ranked in terms of Trading Volumes (Descending Order)	Proportion of Volume Traded as a percentage of Total in that Class	Proportion of Orders Executed as a percentage of Total in that Class	Percentage of Passive Orders	Percentage of Aggressive Orders	Percentage of Directed Orders
Canadian Imperial Bank of Commerce 2IGI19DL77OX0HC3ZE78	14.91%	10.27%	0%	100%	0%
Toronto-Dominion Securities PT3QB789TSUIDF371261	11.68%	13.00%	0%	100%	0%
Citigroup Global Markets Inc. XKZZ2JZF41MRHTR1V493	10.47%	11.05%	0%	100%	0%
Shore Capital Stockbrokers Ltd. 2138009KZO3MK7TV6372	9.19%	9.49%	0%	100%	0%
Sigma Broking Ltd 2138004RRDC64K7UD291	8.62%	4.68%	0%	100%	0%

# Class of Instrument: Equities – Shares & Depositary Receipts

CAIM

Notification if <1 Average Trade per Business Day in the Previous Year

Yes

Top Five Execution Venues ranked in terms of Trading Volumes (Descending Order)	Proportion of Volume Traded as a percentage of Total in that Class	Proportion of Orders Executed as a percentage of Total in that Class	Percentage of Passive Orders	Percentage of Aggressive Orders	Percentage of Directed Orders
Alliance Bernstein 54930049G8WQ50USD19	65.22%	67.55%	0%	100%	0%
Citigroup Global Markets Inc. XKZZ2JZF41MRHTR1V493	28.64%	21.05%	0%	100%	0%
ADM Investor Services 213800GNABQM2M887812	5.63%	7.89%	0%	100%	0%
CanAccord Genuity ZBU7V5NIMN4ILRFC23	0.51%	3.51%	0%	100%	0%

# Class of Instrument: Currency Derivatives

CAIM

Notification if <1 Average Trade per Business Day in the Previous Year

Yes

Top Five Execution Venues ranked in terms of Trading Volumes (Descending Order)	Proportion of Volume Traded as a percentage of Total in that Class	Proportion of Orders Executed as a percentage of Total in that Class	Percentage of Passive Orders	Percentage of Aggressive Orders	Percentage of Directed Orders
Crown Agents Bank 21380011ZYMBN21SZ194	68.29%	50.00%	0%	100%	0%
BNY Mellon HPFHU00Q28E4N0NFVK49	31.71%	50.00%	0%	100%	0%

Article 3.3 of RTS 28 requires us to provide a summary of our analysis and conclusions from our monitoring of the quality of execution obtained on the execution venues where trades were executed during the report period. This is valid for all asset classes except where specific asset classes are indicated.

Our Best Execution & Order Handling policy, which is reviewed annually, states the order of importance of the different execution factors with price being the most important factor for all instruments except equities. For equity execution we accept the market price and hence the total cost of the transaction is the most important consideration.

With price being the primary importance in our execution policy we are always looking for further counterparties that may increase our pool for price discovery or can offer significant new issue flow. For fixed income, where we do the majority of transactions, some venues were removed from our list due to them not continuing to offer the level of coverage for price discovery as previously. Other venues were added where it is intended that they will increase our price discovery depth.

For equities, where we executed fewer trades, we added extra venues to assess the impact on commission cost due to the unbundling of research and transaction costs. For currency derivatives, the level of transactions fell which led us to take a decision to lower the number of venues we use to allow the possibility of giving them enough trade to maintain the relationship. The least used in the prior year were removed from the list.

One venue used for currency derivatives execution is under co-ownership with the firm. It is a separate legal entity and, in terms of execution, the entity is treated the same as any other venue with no special arrangements in place.

There were no significant issues in settlement processes with any of the venues across all the asset classes.

No specific arrangements exist with any execution venues regarding payments, discounts, rebates or non-monetary benefits.

Our order execution arrangements do not differ with client categorisation as we only deal with professional clients.

The firm uses a third party system to aid in the process of the daily checking of executed prices. This is achieved by measuring against either the market quote at time of execution or if this is not available a quote provided by the third party which attempts to provide a market type quote using as many venues as possible within the market regardless of whether they are available to the firm or not. Our analysis of the outcomes of this comparison is done daily and the outcomes of this analysis regularly reviewed in line with the policy.

The firm does not subscribe to the services of a consolidated tape provider.

# Contact


Crown Agents  


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