Our Approach to Order Execution



As a company it is our aim when executing your orders, to get the best possible result that we can on your behalf.

To achieve that aim we take a number of execution factors into consideration, including:

- Price
- Costs
- Speed
- · Likelihood of execution and settlement
- Size
- · Any other consideration relevant to the execution of an order

UK Shares and International Shares, we use the RSP model (Retail Service Providers), this is where we electronically poll our panel of Market counterparties (RSP's) for their best price for a trade and then using built in Best Execution will display only the single best available price based on the above execution factors for client's to make a decision.

We continually conduct Order Execution monitoring of the trades we execute, to ensure they adhere to the above execution factors and process.

Equities (Shares & Depositary Receipts)

This table shows the top 5 execution venues for Equities (January 1st - December 2017)						
Rank	Top five execution venues ranked in terms of trading volumes %	Proportion of volume traded as a percentage of total in that class (%)		Percentage of passive orders (%)	Percentage of aggressive orders (%)	Percentage of directed orders (%)*
1	Winterflood Securities Limited 8BRUP6V1DX3PIG2R0745	34.16	40.33	N/A	N/A	0
2	Peel Hunt Limited 5493007DWN0R4YBM4C84	14.90	23.37	N/A	N/A	0
3	KCG Europe Ltd 549300346EFUPFCXJT79	14.44	13.01	N/A	N/A	0
4	J.P. Morgan Securities plc K6Q0W1PS1L1O4IQL9C32	10.67	0.60	N/A	N/A	0
5	Jefferies International Ltd S5THZMDUJCTQZBTRVI98	5.45	2.96	N/A	N/A	0

Notes:

For UK shares, we use a system called 'Price Polling' to get you the best price for your order. This means that we ask all our market counterparties to give us their best price when you place an order and then use the counterparty who's provided the best price. Price, speed, and likelihood of execution are the most important factors that determine how we execute orders.

We carry out daily checks to see whether any trades have been executed outside the prices that should have been available at that time. If we do find any trades, we contact the market counterparty for an explanation and try to get the price amended where possible. We also keep a close eye on the Price Polling system to continually improve it and make sure it's working as expected, and check on the order execution quality of our market counterparties.

If you're trading international shares, we'll route your order to a single international market counterparty, Banca IMI. They will execute your order in line with their own Order Execution Policy, which we have reviewed and are happy that they are taking all the steps to get you the best deal.

*We don't trade in these types of order. 'Passive order' means an order entered into the order book that provided liquidity. 'Aggressive order' means an order entered into the order book that took liquidity.

- We don't accept directed orders, only in very exceptional circumstances

Our Approach to Order Execution



Debt Instruments

	This table shows the top 5 execution venues for Debt Instruments (January 1st - December 2017)						
Rank	Top five execution venues ranked in terms of trading volumes %	Proportion of volume traded as a percentage of total in that class (%)	as percentage of	Percentage of passive orders (%)	Percentage of aggressive orders (%)	Percentage of directed orders (%)*	
1	Winterflood Securities Limited 8BRUP6V1DX3PIG2R0745	37.66	46.44	N/A	N/A	0	
2	Peel Hunt Limited 5493007DWN0R4YBM4C84	35.08	25.99	N/A	N/A	0	
3	Canaccord Genuity Ltd ZBU7VFV5NIMN4ILRFC23	16.44	21.42	N/A	N/A	0	
4	Cantor Fitzgerald Europe 549300KM6VUHPKQLQX53	9.85	4.30	N/A	N/A	0	
5	Pershing Securities Limited 549300NC3GURN0AEZU06	0.53	0.12	N/A	N/A	0	

Notes:

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Derivatives

This table shows the top 5 execution venues for Debt Instruments (January 1st - December 2017)						
Rank	Top five execution venues ranked in terms of trading volumes %	a percentage of	Proportion of orders executed as percentage of total in that class (%)		Percentage of aggressive orders (%)	Percentage of directed orders (%)*
1	SG Option Europe SA 969500FDN8G43HMHZM83	97.54	95.56	N/A	N/A	0
2	Canaccord Genuity Ltd ZBU7VFV5NIMN4ILRFC23	0.87	1.56	N/A	N/A	0
3	Peel Hunt Limited 5493007DWN0R4YBM4C84	0.87	0.67	N/A	N/A	0
4	Winterflood Securities Limited 8BRUP6V1DX3PIG2R0745	0.31	0.67	N/A	N/A	0
5	Cantor Fitzgerald Europe 549300KM6VUHPKQLQX53	0.18	0.44	N/A	N/A	0

Notes:

For Bonds, gilts, and other fixed income investments, the process for these is very similar to UK shares, in that we start by using the 'Price Polling' system, but trades are more often negotiated individually by dealers. This is because there are fewer market counterparties for these investments so there's less competition to offer the best price.

We carry out daily checks to see whether any trades have been executed outside the prices that should have been

available at that time. If we do find any trades, we contact the market counterparty for an explanation and try to get the price amended where possible. We also keep a close eye on the Price Polling system to continually improve it and make sure it's working as expected, and check on the order execution quality of our market counterparties.

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Our Approach to Order Execution



Debt Instruments

This table shows the top 5 execution venues for ETFs(January 1st - December 2017)							
Rank	Top five execution venues ranked in terms of trading volumes %	Proportion of volume traded as a percentage of total in that class (%)	as percentage of	Percentage of passive orders (%)	Percentage of aggressive orders (%)	Percentage of directed orders (%)*	
1	Winterflood Securities Limited 8BRUP6V1DX3PIG2R0745	52.58	55.54	N/A	N/A	0	
2	Peel Hunt Limited 5493007DWN0R4YBM4C84	30.63	20.59	N/A	N/A	0	
3	Susquehanna Int Group Ltd 635400IAV22ZOU1NFS89	11.03	15.95	N/A	N/A	0	
4	KCG Europe Ltd 549300346EFUPFCXJT79	2.87	3.60	N/A	N/A	0	
5	SG Option Europe SA 969500FDN8G43HMHZM83	2.06	3.42	N/A	N/A	0	

Notes:

For ETFs, the process for these is very similar to UK shares, in that we start by using the 'Price Polling' system, but trades are more often negotiated individually by dealers. This is because there are fewer market counterparties for these investments so there's less competition to offer the best price.

We carry out daily checks to see whether any trades have been executed outside the prices that should have been available at that time. If we do find any trades, we contact the market counterparty for an explanation and try to get the price amended where possible. We also keep a close eye on the Price Polling system to continually improve it and make sure it's working as expected, and check on the order execution quality of our market counterparties.

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- We don't accept directed orders, only in very exceptional circumstances.