

# MiFID-II RTS 28 Annex II reporting

## Reporting Period – CY 2019

Class of Instrument	Equities - Tick size liquidity bands 5 and 6	
Notification if <1 average trade per business day in the previous year	N	
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 percentage of total in that class
<b>J.P. Morgan Securities Plc</b> K6Q0W1PS1L1O4IQL9C32	57.5%	74.7%
<b>Morgan Stanley &amp; Co. International plc</b> 4PQUHN3JPFGFNF3BB653	42.4%	25.3%
None		
None		
None		

No reporting is provided in respect of passive/aggressive or directed orders as such terminology is inapplicable in respect of trades of this sort.

Class of Instrument	Equities - Tick size liquidity bands 3 and 4	
Notification if <1 average trade per business day in the previous year	Y	
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 percentage of total in that class
<b>Morgan Stanley &amp; Co. International plc</b> 4PQUHN3JPF GFNF3BB653	69.0%	50.0%
<b>J.P. Morgan Securities Plc</b> K6Q0W1PS1L1O4IQL9C32	31.0%	50.0%
None		
None		
None		

No reporting is provided in respect of passive/aggressive or directed orders as such terminology is inapplicable in respect of trades of this sort.

Class of Instrument	Equities - Tick size liquidity bands 1 and 2	
Notification if <1 average trade per business day in the previous year	Y	
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 percentage of total in that class
<b>J.P. Morgan Securities Plc</b> K6Q0W1PS1L1O4IQL9C32	83.9%	87.5%
<b>Morgan Stanley &amp; Co. International plc</b> 4PQUHN3JPF GFNF3BB653	16.1%	12.5%
None		
None		
None		

No reporting is provided in respect of passive/aggressive or directed orders as such terminology is inapplicable in respect of trades of this sort.

Class of Instrument	Equity Derivatives - Contracts for difference	
Notification if <1 average trade per business day in the previous year	Y	
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 percentage of total in that class
<b>Morgan Stanley &amp; Co. International plc</b> 4PQUHN3JPFNF3BB653	94.6%	87.0%
<b>J.P. Morgan Securities Plc</b> K6Q0W1PS1L1O4IQL9C32	5.4%	13.0%
None		
None		
None		

No reporting is provided in respect of passive/aggressive or directed orders as such terminology is inapplicable in respect of trades of this sort.

Class of Instrument	Equity Derivatives - Options and Futures admitted to trading on a trading venue	
Notification if <1 average trade per business day in the previous year	Y	
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 percentage of total in that class
<b>J.P. Morgan Securities Plc</b> K6Q0W1PS1L1O4IQL9C32	89.6%	90.2%
<b>Morgan Stanley &amp; Co. International plc</b> 4PQUHN3JPF GFNF3BB653	10.4%	9.8%
None		
None		
None		

No reporting is provided in respect of passive/aggressive or directed orders as such terminology is inapplicable in respect of trades of this sort.

Class of Instrument	Exchange traded funds	
Notification if <1 average trade per business day in the previous year	Y	
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 percentage of total in that class
<b>Morgan Stanley &amp; Co. International plc</b> 4PQUHN3JPFGFNF3BB653	96.2%	84.4%
<b>J.P. Morgan Securities Plc</b> K6Q0W1PS1L1O4IQL9C32	3.8%	15.6%
None		
None		
None		

No reporting is provided in respect of passive/aggressive or directed orders as such terminology is inapplicable in respect of trades of this sort.

## Best Execution Qualitative Information

<p><b>A summary of the analysis and conclusions the firm draws from its detailed monitoring of the quality of execution obtained on the execution venues where it executed all client orders in the previous year</b></p>	<p><b>Equities - Shares &amp; Depositary Receipts &amp; Equity Cfds</b> <i>As part of MLCM's analysis of best execution in relation to equities, the Firm analysed the trades during the relevant period to determine whether any of the trades were greater than 300bps from the VWAP.</i></p> <p><i>The monitoring completed confirmed that best execution was obtained consistently on the approved execution venues throughout the year.</i></p> <p><b>Equity Futures and Options admitted to trading on a trading venue</b> <i>As part of the Firm's analysis of best execution in relation to equity derivatives, the Firm analysed the trades during the relevant period to determine whether any of the trades were outside of the published market bid-offer spread.</i></p> <p><i>Any trades falling outside of this spread were further investigated, taking into account factors such as size of trade, liquidity and urgency of execution, that may have impacted the price achieved.</i></p> <p><i>The monitoring completed confirmed that best execution was obtained consistently on the approved execution venues throughout the year.</i></p>
<p><b>An explanation of the relative importance the firm gave to the execution factors of price, costs, speed, likelihood of execution or any other consideration including qualitative factors when assessing the quality of execution</b></p>	<p><i>MLCM's delivery of best execution is a key element in its commitment to act in the best interests of its clients, as well as being a regulatory requirement. The Firm prioritises ensuring that all sufficient steps are taken to obtain the best possible result for its clients when it executes, places or transmits orders on their behalf. This means taking into account the 'execution factors' such as price, costs, speed, likelihood of execution and settlement, size, nature or any other consideration relevant to the execution of the order.</i></p> <p><i>The relative importance of the execution factors is judged on an order-by-order basis in line with the Firm's industry experience and prevailing market conditions. In addition, common key factors for relevant asset classes have been identified as follows:</i></p> <p><b>Equities &amp; Cfds</b> <i>For small orders over a short period of time, the key factors are generally price, quantity based on market availability, and likelihood of execution. For larger orders executed across a period of time, the Firm additionally takes into account confidentiality,</i></p>

	<p><i>minimising the impact on the market, and slippage historically achieved on each venue.</i></p> <p><i>Where transactions are executed indirectly, relevant factors also include overall costs including broker fee schedules, impact and observed slippage.</i></p> <p><i>The impact of implicit costs is taken into account when considering the execution strategy of orders to ensure that they are managed and do not result in an undue impact to total costs.</i></p> <p><b>Futures &amp; Options</b>  <i>Key factors considered are price, observed volume on exchange, and overall transaction costs. Prices are often compared via a request for quote (“RFQ”), taking into account additional transaction costs that may be applicable. When transactions are time-sensitive, response time to RFQ is often a factor. On occasion, preference is given to counterparties that are operationally easier to work with where time factors are at play.</i></p> <p><i>Where orders are executed indirectly, relevant factors such as costs and the existing broker relationship are also considered.</i></p> <p><i>For more illiquid derivatives, where execution options are available, historical price and liquidity are key factors for execution.</i></p>
<p><b>A description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders</b></p>	<p><i>The Firm does not have any close links, conflicts of interests or common ownerships with respect to the execution venues it uses to execute orders.</i></p>
<p><b>A description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received</b></p>	<p><i>MLCM has not entered into any arrangements with its execution venues regarding payments made or received, discounts or non-monetary benefits that would compromise its ability to meet its obligations in regards to best execution, conflicts of interest or inducements.</i></p> <p><i>The Firm has determined that it will pay for research from its own P&amp;L and as such has arrangements in place to remunerate certain firms for the receipt of such research. Additionally MLCM may on occasion receive or provide minor non-monetary benefits from execution venues. They must be received/provided in accordance with the Firm’s Inducements policy.</i></p>



<p><b>An explanation of the factors that led to a change in the list of execution venues listed in the firm's execution policy, if such a change occurred</b></p>	<p><i>The list of execution venues contained within the Best Execution policy did not change during the period under review.</i></p>
<p><b>An explanation of how order execution differs according to client categorisation, where the firm treats categories of clients differently and where it may affect the order execution arrangements</b></p>	<p><i>While MLCM does take the characteristics of its clients into account when judging the relative importance of the execution factors, the Firm's clients are exclusively professional clients and so are treated with a consistent approach.</i></p>
<p><b>An explanation of whether other criteria were given precedence over immediate price and cost when executing retail client orders and how these other criteria were instrumental in delivering the best possible result in terms of the total consideration to the client</b></p>	<p><i>The Firm does not execute retail client orders.</i></p>
<p><b>An explanation of how the Firm has used any data or tools relating to the quality of execution, including any data published under Commission Delegated Regulation (EU) 2017/575</b></p>	<p><i>MLCM compares and analyses relevant data to obtain best execution for a client, including execution quality data. The Firm transmits or places orders with other entities for execution and when the order relates to OTC products including bespoke products, checks the fairness of the price proposed to the client, by gathering market data used in the estimation of the price of such product and, where possible, by comparing with similar or comparable products.</i></p>
<p><b>Where applicable, an explanation of how the investment firm has used output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU.</b></p>	<p><i>This is not currently applicable.</i></p>