

# RTS 28: Top 5 Execution Venues 2018

## Orders Routed for Retail Clients

Class of Instrument	Mutual Fund				
Notification if <1 average trade per business day in the previous year	Y/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 <sup>1</sup>	Proportion of orders executed as percentage of total in that class <sup>2</sup>	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Name and Venue Identifier (MIC or LEI) <b>BBH</b> 5493006KMX1VFTPYPW14	100%	100%	N/A	N/A	100%
Name and Venue Identifier (MIC or LEI)					
Name and Venue Identifier (MIC or LEI)					
Name and Venue Identifier (MIC or LEI)					
Name and Venue Identifier (MIC or LEI)					

The information contained in the above table should be read alongside the SEI Investment (Europe) Limited (“SEI”) Order Handling & Execution Policy, which confirms that SEI is an order router of trades only (we do not execute trades for clients), outlines our approach to trade order handling, explains the relative importance that SEI affords various execution factors in this capacity and details how we process client specific instructions.

Because SEI only ever routes trades to other Investment Firms (either a third party or an Affiliate) for that firm to execute/bring about trade execution, our Order Handling & Execution Policy also lists out the Investment Firms who SEI have approved as suitable for passing client orders to. There are two Affiliates of SEI included in this list, SEI Investment Management Company and SEI Investments Distribution Company. The Policy sets out our selection criteria that we require any “Approved Entity” to meet.

SEI is unaware of any conflicts of interest with respect to its order routing services. SEI does not charge or receive any rebate for its order routing services.

<sup>1</sup> This figure represents the percentage of orders traded by value

<sup>2</sup> This figure represents the percentage of orders by number of trades

### Orders Routed for Professional Clients

Class of Instrument	Mutual Fund				
Notification if <1 average trade per business day in the previous year	Y/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 <sup>3</sup>	Proportion of orders executed as percentage of total in that class <sup>4</sup>	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Name and Venue Identifier (MIC or LEI) <b>COFUNDS</b> 213800XRUPSOZUPSF553	60.76%	16.38%	N/A	N/A	100%
Name and Venue Identifier (MIC or LEI) <b>Allfunds Bank</b> 95980020140005800000	24.13%	8.33%	N/A	N/A	100%
Name and Venue Identifier (MIC or LEI) <b>SMITH &amp; WILLIAMSON</b> 213800QMG53TFF1BFP12	7.05%	27.12%	N/A	N/A	100%
Name and Venue Identifier (MIC or LEI) <b>BBH</b> 5493006KMX1VFTYPY14	5.64%	42.80%	N/A	N/A	100%
Name and Venue Identifier (MIC or LEI) <b>Euroclear (Fund Settle)</b>	1.07%	0.54%	N/A	N/A	100%
Name and Venue Identifier (MIC or LEI) <b>Citi Europe Plc</b>	1.00%	4.36%	N/A	N/A	100%

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<sup>4</sup> This figure represents the percentage of orders by number of trades

### Orders Routed for Professional Clients

Class of Instrument	Equity				
Notification if <1 average trade per business day in the previous year	Y/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 <sup>5</sup>	Proportion of orders executed as percentage of total in that class <sup>6</sup>	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
<b>WBS</b> 8BRUP6V1DX3PIG2R0745	74.0%	95.39%	N/A	N/A	100%
<b>HSBC Bank PLC (HBEU)</b> MP6I5ZYZBEU3UXPYFY54	26.0%	4.61%	N/A	N/A	100%
Name and Venue Identifier (MIC or LEI)					
Name and Venue Identifier (MIC or LEI)					
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### Orders Routed for Professional Clients

Class of Instrument	Exchange Traded Fund				
Notification if <1 average trade per business day in the previous year	Y/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 <sup>7</sup>	Proportion of orders executed as percentage of total in that class <sup>8</sup>	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
<b>WBS</b> 8BRUP6V1DX3PIG2R0745	68.0%	52.0%	N/A	N/A	100%
<b>HSBC Bank PLC (HBEU)</b> MP6I5ZYZBEU3UXPYFY54	32.0%	48.0%	N/A	N/A	100%
Name and Venue Identifier (MIC or LEI)					
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Name and Venue Identifier (MIC or LEI)					

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<sup>8</sup> This figure represents the percentage of orders by number of trades

### Orders Routed for Professional Clients

Class of Instrument	Fixed Income				
Notification if <1 average trade per business day in the previous year	Y/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 <sup>9</sup>	Proportion of orders executed as percentage of total in that class <sup>10</sup>	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
<b>WBS</b> 8BRUP6V1DX3PIG2R0745	100%	100%	N/A	N/A	100%
Name and Venue Identifier (MIC or LEI)					
Name and Venue Identifier (MIC or LEI)					
Name and Venue Identifier (MIC or LEI)					
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<sup>10</sup> <sup>10</sup> This figure represents the percentage of orders by number of trades

### Orders Routed for Professional Clients

Class of Instrument	Other Instruments – Hedge Funds				
Notification if <1 average trade per business day in the previous year	Y/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 <sup>11</sup>	Proportion of orders executed as percentage of total in that class <sup>12</sup>	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
<b>HSBC Funds Plc</b>	89.05%	91.42%	N/A	N/A	100%
<b>MDO Management Co SA - LU</b> (Pareturn - Gladwyne Absolute Credit)	5.11%	2.13%	N/A	N/A	100%
<b>Corinthian Capital Management Ltd</b>  (Doric Asia Pacific)	2.92%	3.60%	N/A	N/A	100%
<b>Otus Capital Management A/C KY</b>  (Maga Smaller Cos Fund Ltd)	1.46%	1.15%	N/A	N/A	100%
<b>Butterfield Bank (Guernsey) Limited/ MDO Management Co SA - LU</b>  (Pareturn - Gladwyne Absolute Credit)	0.73%	1.41%	N/A	N/A	100%
<b>Lansdowne Princay Fund Limited</b>	0.73%	0.41%	N/A	N/A	100%

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<sup>12</sup> <sup>12</sup> This figure represents the percentage of orders by number of trades