

SEI Investments (Europe) Ltd

# RTS 28: Top 5 Execution Venues

## 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)					

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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 and the re-approval and rejection process for Approved Entities overseen by the Best Execution Working Group.

<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

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SEI is unaware of any conflicts of interest with respect to its order routing services. SEI does not charge or receive any rebate, discount or non-monetary benefit for its order routing services.

### 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	33.17%	48.85%	N/A	N/A	100%
Name and Venue Identifier (MIC or LEI) <b>Allfunds Bank</b> 95980020140005800000	39.15%	46.01%	N/A	N/A	100%
Name and Venue Identifier (MIC or LEI) <b>BBH</b> 5493006KMX1VFTYPY14	16.19%	3.04%	N/A	N/A	100%
Name and Venue Identifier (MIC or LEI) <b>Citi Europe Plc</b>	11.08%	2.01%	N/A	N/A	100%
Name and Venue Identifier (MIC or LEI) <b>SMITH &amp; WILLIAMSON</b> 213800QMG53TFF1BFP12	0.41%	0.9%	N/A	N/A	100%

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that SEI affords various execution factors in this capacity and details how we process client specific instructions. The SEI Order Handling & Execution Policy is publicly available on SEI’s website.

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**Orders Routed for Professional Clients**

Class of Instrument	<b>Equities – Tick size liquidity bands 1 and 2 (from 0 to 79 trades per day)</b>				
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 <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	98.14%	88.05%	N/A	N/A	100%
<b>HSBC Bank PLC (HBEU)</b> MP6I5ZYZBEU3UXPYFY54	1.86%	11.95%	N/A	N/A	100%
Name and Venue Identifier (MIC or LEI)					

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Class of Instrument	<b>Equities – Tick size liquidity bands 3 and 4 (from 80 to 1999 trades per day)</b>				
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 <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	97.28%	78.02%	N/A	N/A	100%
<b>HSBC Bank PLC (HBEU)</b> MP6I5ZYZBEU3UXPYFY54	2.72%	21.98%	N/A	N/A	100%
Name and Venue Identifier (MIC or LEI)					

<sup>7</sup> This figure represents the percentage of orders traded by value

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

Class of Instrument	<b>Equities - Tick size liquidity bands 5 and 6 (from 2000 trades per day)</b>				
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 <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	85.52%	92.06%	N/A	N/A	100%
<b>HSBC Bank PLC (HBEU)</b> MP6I5ZYZBEU3UXPYFY54	14.48%	7.94%	N/A	N/A	100%
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### Orders Routed for Professional Clients

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<sup>10</sup> This figure represents the percentage of orders by number of trades

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>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>WBS</b> 8BRUP6V1DX3PIG2R0745	95.53%	57.30%	N/A	N/A	100%
<b>HSBC Bank PLC (HBEU)</b> MP6I5ZYZBEU3UXPYFY54	4.47%	42.70%	N/A	N/A	100%
Name and Venue Identifier (MIC or LEI)					
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**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>13</sup>	Proportion of orders executed as percentage of total in that class <sup>14</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)					
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#### 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>15</sup>	Proportion of orders executed as percentage of total in that class <sup>16</sup>	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
<b>MDO Management Co SA - LU</b> (Pareturn - Gladwyne Absolute Credit)	52.04%	56.94%	N/A	N/A	100%
<b>Otus Capital Management IE</b>	34.96%	26.17%	N/A	N/A	100%
<b>Egerton Capital IE</b>	10.54%	11.11%	N/A	N/A	100%
<b>Lansdowne Princay Fund Limited KY</b>	2.46	2.78%	N/A	N/A	100%

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