

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 ¹	Proportion of orders executed as percentage of total in that class ²	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Name and Venue Identifier (MIC or LEI) BBH 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.

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.

¹ This figure represents the percentage of orders traded by value

² 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 ³	Proportion of orders executed as percentage of total in that class ⁴	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Name and Venue Identifier (MIC or LEI) COFUNDS 213800XRUPSOZUPSF553	34.72%	19.49%	N/A	N/A	100%
Name and Venue Identifier (MIC or LEI) Allfunds Bank 95980020140005800000	61.01%	63.08%	N/A	N/A	100%
Name and Venue Identifier (MIC or LEI) Euroclear (Fund Settle) 5493003EDPTWGW4F3K05	0.38%	0.64%	N/A	N/A	100%
Name and Venue Identifier (MIC or LEI) BBH 5493006KMX1VFTYPWPW14	2.62%	11.25%	N/A	N/A	100%
Name and Venue Identifier (MIC or LEI) Citi Europe Plc	1.27%	5.54%	N/A	N/A	100%

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Orders Routed for Professional Clients

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Class of Instrument	Equities – Tick size liquidity bands 1 and 2 (from 0 to 79 trades per day)				
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 ⁵	Proportion of orders executed as percentage of total in that class ⁶	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
WBS 8BRUP6V1DX3PIG2R0745	92.9%	95.2%	N/A	N/A	100%
HSBC Bank PLC (HBEU) MP6I5ZYZBEU3UXPYFY54	7.1%	4.8%	N/A	N/A	100%
Name and Venue Identifier (MIC or LEI)					

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Class of Instrument	Equities – Tick size liquidity bands 3 and 4 (from 80 to 1999 trades per day)				
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 ⁷	Proportion of orders executed as percentage of total in that class ⁸	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
WBS	76.99%	84.28%	N/A	N/A	100%

8BRUP6V1DX3PIG2R0745					
HSBC Bank PLC (HBEU) MP6I5ZYZBEU3UXPYFY54	23.01%	15.72%	N/A	N/A	100%
Name and Venue Identifier (MIC or LEI)					

⁷ This figure represents the percentage of orders traded by value

⁸ This figure represents the percentage of orders by number of trades

Class of Instrument	Equities - Tick size liquidity bands 5 and 6 (from 2000 trades per day)				
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 ⁹	Proportion of orders executed as percentage of total in that class ¹⁰	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
WBS 8BRUP6V1DX3PIG2R0745	88.09%	96.36%	N/A	N/A	100%
HSBC Bank PLC (HBEU) MP6I5ZYZBEU3UXPYFY54	11.91%	3.64%	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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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 ¹¹	Proportion of orders executed as percentage of total in that class ¹²	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
WBS 8BRUP6V1DX3PIG2R0745	92.35%	61.93%	N/A	N/A	100%
HSBC Bank PLC (HBEU) MP6I5ZYZBEU3UXPYFY54	7.65%	38.07%	N/A	N/A	100%

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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 ¹³	Proportion of orders executed as percentage of total in that class ¹⁴	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
WBS 8BRUP6V1DX3PIG2R0745	100%	100%	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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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 ¹⁵	Proportion of orders executed as percentage of total in that class ¹⁶	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Metropolitan West Asset Management	3.85%	12.85%	N/A	N/A	100%
Otus Capital Management IE	3.85%	8.68%	N/A	N/A	100%
Egerton Capital IE	3.85%	2.88%	N/A	N/A	100%

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¹⁶ This figure represents the percentage of orders by number of trades

Lansdowne Partners Limited KY	69.22%	57.32%	N/A	N/A	100%
Corinthian Capital Management Ltd	19.23%	18.27%	N/A	N/A	100%

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