RTS 28 Statements

Period of review: Full Year 2020

Introduction

Investment firms are required to publish, for each class of financial instruments, a summary of their analysis from their detailed monitoring by venue of the quality of execution obtained on all client orders in the previous year.

As the Firm is an alternative investment fund manager with MiFID top-up permissions, it is required to provide data and make statements only about those asset classes in which it carries out *Indirect* Executions. Hence, information about the Firm's *Direct* Executions is not included in this report. As all executions reported here are Indirect, reference is only made to Brokers (not venues) – these being the counterparties to whom orders are sent.

The Firm carries out transactions (whether Direct or Indirect) in a relatively small number of Asset Classes. Furthermore, this report only covers orders from the Firm's European entity (HALLP).

a) Execution Factors

Firms are required to provide an explanation of the relative importance of various execution factors considered when executing trades. ESMA provides a list of factors but firms may consider additional factors. The Firm has included a number of additional factors as denoted below.

Equities

The analysis below covers the following Mifid Categories as defined by ESMA.

	Class	Sub Class
A (i)	Equities — Shares & Depositary Receipts	Tick size liquidity bands 5 and 6
A (ii)	Equities — Shares & Depositary Receipts	Tick size liquidity bands 3 and 4
A (iii)	Equities — Shares & Depositary Receipts	Tick size liquidity band 1 and 2
M.	Other instruments	Other instruments (non-EU equities and EU preference shares)

Execution Factor	Factor Type	Relative Importance	Reason
Price	ESMA	High	Achieving the best possible price for the entire order is the key to execution. Therefore, using TCA, we compare our final execution price both to the prevailing price at the time the order was passed to the relevant Broker and to the closing price when the order has completed.
Costs	ESMA	Medium	We try to ensure that we pay similar execution commission rates (explicit costs) to all our Brokers. We regularly benchmark, negotiate and review our commission rates to ensure we are never paying rates that are higher than necessary.
Speed	ESMA	Medium	The traders will execute at a speed that allows them to capture liquidity at the prevailing price without adversely affecting the market. Traders may, on occasion respond to breaking news or to an internal requirement to reduce risk and in those cases; speed of execution becomes a more significant factor.
Likelihood of Execution	ESMA	Medium	Traders have selected a broad enough roster of Brokers to allow access to most liquidity. Consequently, if the liquidity is not available then price remains the priority and the traders will agree with the portfolio managers not to force the price for the sake of improving the likelihood of execution.
Size	ESMA	Medium	In most cases, our orders are relatively small. However, in certain cases (for example in less liquid stocks) only certain brokers are capable of executing our trade at the terms most favourable to our clients.
Likelihood of settlement	ESMA	Medium	We expect all our brokers to be able to guarantee prompt accurate settlement and so this has little bearing on the dealer's choice of strategy, Broker or Execution Venue. The Firm expends great effort in ensuring that counterparties on the authorised list will be able to effect settlement.
Diversification	Additional	Medium	The Firm reserves the right to avoid trading too much of our flow with a particular broker. This might cause issues from the point of view operational risk, counterparty risk, anonymity or confidentiality.
Anonymity / Data leakage	Additional	Medium	We may choose not to trade with a particular broker for a particular trade if we believe that our order provides information that may

Execution Factor	Factor Type	Relative Importance	Reason
			prove detrimental to the quality of execution of subsequent trades.
Quality and resilience of algorithmic execution technology	Additional	High	Regular broker due diligence is designed to test the resilience, expertise and governance surrounding a broker's electronic trading platform and this makes a significant contribution to our ongoing execution decisions.
Legal Documents	Additional	High	It is extremely important that documents such as Terms of Business and ISDAs (where appropriate) have been agreed to cover all client accounts.

From its monitoring activities, the firm is satisfied that the results (in terms of quality of execution) obtained from the brokers listed in the Top 5 for this instrument class are consistent with the execution factors to which the firm ascribes the most importance for this instrument class.

Exchange Traded Products (Exchange traded funds, exchange traded notes and exchange traded commodities)

Execution Factor	Factor Type	Relative Importance	Reason
Price	ESMA	High	We believe that achieving the best possible price for the entire order is the key to execution. Therefore, we compare our final execution price to the prevailing price at the time the order was passed to the relevant Broker.
Costs	ESMA	Medium	We try to ensure that we pay similar execution commission rates (explicit costs) to all our Brokers. We regularly benchmark, negotiate and review our commission rates to ensure we are never paying rates that are higher than necessary.
Speed	ESMA	Medium / Low	The traders will execute at a speed that allows them to capture liquidity at the prevailing price without adversely affecting the market. ETP trading is often used for risk management and so prompt execution is important but rarely at the expense of price.
Likelihood of Execution	ESMA	Medium / High	Traders have selected a broad enough roster of Brokers to allow access to most liquidity. Consequently, If the liquidity is not available then price remains the priority and the traders will agree with the portfolio managers not to force the price for the sake

			of improving the likelihood of execution. When the transaction is a hedging trade, then likelihood of execution is more important.
Size	ESMA	Medium	In certain cases (for example in less liquid products) only certain brokers are capable of executing our trade at the terms most favourable to our clients.
Likelihood of settlement	ESMA	Medium	We expect all our brokers to be able to guarantee prompt accurate settlement and so this has little bearing on the dealer's choice of strategy, Broker or Execution Venue. The Firm expends great effort in ensuring that counterparties on the authorised list will be able to effect settlement.
Diversification	Additional	Medium	We may decide that concentrating too much of our flow with a particular broker might cause issues from the point of view operational risk, counterparty risk, anonymity or confidentiality.
Anonymity / Data leakage	Additional	Medium	We may choose not to trade with a particular broker for a particular trade if we believe that our order provides information that may prove detrimental to the quality of execution of subsequent trades.

From its monitoring activities, the firm is satisfied that the results (in terms of quality of execution) obtained from the brokers listed in the Top 5 for this instrument class are consistent with the execution factors to which the firm ascribes the most importance for this instrument class.

Equity Derivatives and Interest Rate Derivatives admitted to trading on a trading venue

Execution Factor	Factor Type	Relative Importance	Reason
Price	ESMA	High	We believe that achieving the best possible price for the order is the key to execution. Therefore, we compare our final execution price to the prevailing price at the time the order was passed to the relevant Broker.

Costs	ESMA	Medium / High	We try to ensure that we pay similar execution commission rates (explicit costs) to all our Brokers. We regularly benchmark, negotiate and review our commission rates to ensure we are never paying rates that are higher than necessary. Sometimes the contract fee may represent a high percentage of the premium and so fees are always checked and may be renegotiated.
Speed	ESMA	Medium /Low	The traders will execute at a speed that allows them to capture liquidity at the prevailing price without adversely affecting the market. Futures & Options trading is often used for risk management and so prompt execution is important but rarely at the expense of price.
Likelihood of Execution	ESMA	Medium / High	Traders have selected a broad enough roster of Brokers to allow access to most liquidity. Consequently, If the liquidity is not available then price remains the priority and the traders will agree with the portfolio managers not to force the price for the sake of improving the likelihood of execution. When the transaction is a hedging trade, then likelihood of execution becomes a higher priority.
Size	ESMA	Medium	In certain cases (for example in less liquid products) only certain brokers are capable of executing our trade at the terms most favourable to our clients.
Likelihood of settlement	ESMA	Medium	Derivatives settlement is often short and more complex. The Firm expends great effort in ensuring that counterparties on the authorized list will be able to effect settlement.
Diversification	Additional	Medium	We may decide that concentrating too much of our flow with a particular broker might cause issues from the point of view operational risk, counterparty risk, anonymity or confidentiality.
Legal Documents	Additional	High	It is extremely important that documents such as Terms of Business and ISDAs (where appropriate) have been agreed to cover all client accounts.
Anonymity / Data leakage	Additional	Medium	We may choose not to trade with a particular broker for a particular trade if we believe that our order provides information that may prove detrimental to the quality of execution of subsequent trades.

From its monitoring activities, the firm is satisfied that the results (in terms of quality of execution) obtained from the brokers listed in the Top 5 for this instrument class are consistent with the execution factors to which the firm ascribes the most importance for this instrument class.

b) Close links to any execution venues

The firm has no close links with any execution venue nor any common ownerships with respect to execution venues used to execute orders.

c) Arrangements with execution venues regarding payments

The firm has no arrangements with any execution venues regarding payments made or received discounts, rebates or non-monetary benefits received. Nonetheless, the firm may have commercial arrangements with an execution venue's parent or affiliate that do not relate to execution services (for example prime brokerage or equity research).

d) Factors that led to a change in the list of execution venues

The approved execution venues/brokers listed in the Firm's Best Execution Policy were changed during the reporting period. A number of factors are considered when reviewing the list, including:

- Ability of the venue / broker to obtain the best price on an ongoing basis
- Costs of providing the execution service
- Quality and resilience of execution algorithms

The factors leading to such changes were applied on an objective basis, consistent with the Firm's Best Execution Policy and implemented in accordance with the Firm's governance framework.

e) Execution differing according to client categorisation
The firm only executes orders for professional clients.

f) Executing retail client orders

The firm does not execute orders on behalf of retail clients.

g) How the investment firm has used any data or tools relating to the quality of execution

In undertaking this review, the Firm has conducted regular analysis to monitor the quality of the execution obtained using some combination of internal analysis, TCA tools and other data e.g. third party reports etc. that may have been available.

h) How the investment firm has used output of a consolidated tape provider

There are no consolidated tape providers in Europe currently and so the Firm makes use of the Bloomberg Composite for its consolidated view of most markets. For executions in the US, the firm may use CTS and CQS data to assist in monitoring the quality of executions.