

Aberdeen Asset Managers Limited (AAML) MiFID II 2018 Top 5 Reports - Retail

RTS 28, Article 65

Broker Reports

Venue Reports

Broker Report					
Class of Instrument		Equities – Shares & Depositary Receipts - Tick Size Band 1 & 2			
Notification if <1 average trade per business day in the previous year		N			
Top 5 Execution Venues ranked in terms of trading volumes (descending order) Proportion of volume traded as a percentage of total in that class	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
J. P. Morgan Securities Plc K6Q0W1PS1L1O4IQL9C32	25.87%	19.36%	n/a	n/a	n/a
Cannacord Genuity Limited ZBU7V5V5NIMN4ILRFC23	19.52%	9.21%	n/a	n/a	n/a
Winterflood Securities Limited 8BRUP6V1DX3PIG2R0745	17.82%	17.81%	n/a	n/a	n/a
Cenkos Securities Plc 213800ALVRC52VN3I821	11.38%	11.88%	n/a	n/a	n/a
Cantor Fitzgerald Europe 549300KM6VUHPKQLQX53	10.94%	10.03%	n/a	n/a	n/a
Commentary					
(a) An explanation of the relative importance your 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;		Immediate price and cost, total consideration, is the only criteria applied for retail transactions.			
(b) A description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders;		There are no close links, conflicts of interest or common ownership with respect to any brokers used to execute orders.			
(c) A description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received;		AAML does not maintain any such arrangements with execution venues. Commission rates are the same across all counterparties for the same market/product, and no discounts, rebates or non-monetary benefits are received.			
(d) 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;		During the normal course of business, AAML continuously assesses the features of the markets in which it is active. Where we feel the addition of an execution venue represents a necessary step to achieve best execution, we will open a trading relationship with that venue. The factors that lead to a change in the list of execution venues include market structure changes, the arrival of new venues within a market, or the requirement to access new sources of liquidity and price improvement opportunities.			
(e) 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;		AAML treats retail orders differently than professional - (f) explains the prioritisation of factors for retail clients. All other order execution is on behalf of Professional investors and is conducted by the Investment Execution function according to the principles outlined in reports for Professional investors			
(f) 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;		Immediate price and cost – that is, total consideration – is the only criteria applied for retail transactions.			

(g) An explanation of how the investment firm has used any data or tools relating to the quality of execution, including any data published under Commission Delegated Regulation (EU) 2017/575;	AAML performs the daily monitoring of all retail orders (100% sample size) to ensure the price obtained by the third party service provider DST is within the spread quoted by the brokers. Further checks are performed in case of cross trades to ensure the smaller amount of the cross is dealt at the 'mid-price' and the larger side of the cross trade is dealt within spread quoted by the brokers. Any discrepancies are challenged and escalated to Global Head of Investment control.
(h) 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.	This is N/A for the 2018 report as this references the RTS 27 'Quality of Execution' reports that banks & trading venues will provide.

Broker Report

Class of Instrument		Equities – Shares & Depositary Receipts - Tick Size Band 3 & 4			
Notification if <1 average trade per business day in the previous year		N			
Top 5 Execution Venues ranked in terms of trading volumes (descending order) Proportion of volume traded as a percentage of total in that class	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Stifel Nicolaus Europe Limited 213800BVEFNZ8UYPKL03	81.59%	16.34%	n/a	n/a	n/a
Cannacord Genuity Limited ZBU7V5NIMN4ILRFC23	18.41%	5.95%	n/a	n/a	n/a

Commentary

(a) An explanation of the relative importance your 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;	Immediate price and cost, total consideration, is the only criteria applied for retail transactions.
(b) A description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders;	There are no close links, conflicts of interest or common ownership with respect to any brokers used to execute orders.
(c) A description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received;	AAML does not maintain any such arrangements with execution venues. Commission rates are the same across all counterparties for the same market/product, and no discounts, rebates or non-monetary benefits are received.
(d) 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;	During the normal course of business, AAML continuously assesses the features of the markets in which it is active. Where we feel the addition of an execution venue represents a necessary step to achieve best execution, we will open a trading relationship with that venue. The factors that lead to a change in the list of execution venues include market structure changes, the arrival of new venues within a market, or the requirement to access new sources of liquidity and price improvement opportunities.
(e) 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;	AAML treats retail orders differently than professional - (f) explains the prioritisation of factors for retail clients. All other order execution is on behalf of Professional investors and is conducted by the Investment Execution function according to the principles outlined in reports for Professional investors

(f) 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;	Immediate price and cost – that is, total consideration – is the only criteria applied for retail transactions.
(g) An explanation of how the investment firm has used any data or tools relating to the quality of execution, including any data published under Commission Delegated Regulation (EU) 2017/575;	AAML performs the daily monitoring of all retail orders (100% sample size) to ensure the price obtained by the third party service provider DST is within the spread quoted by the brokers. Further checks are performed in case of cross trades to ensure the smaller amount of the cross is dealt at the ‘mid-price’ and the larger side of the cross trade is dealt within spread quoted by the brokers. Any discrepancies are challenged and escalated to Global Head of Investment control.
(h) 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.	This is N/A for the 2018 report as this references the RTS 27 'Quality of Execution' reports that banks & trading venues will provide.