

# RTS 28 Reporting

## 1 January – 31 December 2017

This document is provided in accordance with the European Market in Financial Instrument Directive 2014/65/EU (“MiFID II”). Mondrian is required to provide details of its top five execution venues by asset class together with a summary of the qualitative monitoring which has been undertaken throughout the year. This document is designed to address Mondrian’s disclosure obligations.

If you have any questions or require further detail regarding our Order Execution Policy please contact your client representative.

### Qualitative Analysis

- Mondrian’s Trading Desk determines which broker to use at the point of execution based on their judgment as to which broker will be able to execute the trade most effectively, and in accordance with Best Execution.
- The primary consideration of the Trading Desk is to execute all transactions at best execution. The desk works with an approved list of counterparties and within guidelines set out by the Best Execution & Trading Oversight Committee, and any client-specific requirements.
- For Equity transactions, Mondrian places the highest equal importance on price and liquidity, followed by speed, likelihood of execution and finally costs associated with execution.
- For Fixed Income & Money Market transactions, Mondrian places the highest importance on price, followed by liquidity, speed and finally likelihood of execution.
- For deliverable and non-deliverable currency forwards, Mondrian places the highest equal importance on price and liquidity, followed by speed, likelihood of execution and finally costs associated with execution. In order to ensure that competitive rates of execution are achieved, forward foreign exchange trade execution with all approved counterparties is actively managed by Mondrian’s Trading Desk.
- Generally, trading commissions are paid on equity trades only. Normally fixed income trading is done on a principal basis with the broker or directly through multilateral trading facilities so it should be expected that no commissions would be paid on these trades. Certain minimal trading venue/platform fees may be chargeable where applicable.
- Clients’ custodians typically impose a trade away cost when executing currency forwards with a counterparty other than the custodian. When determining whether or not to trade away from a client’s custodian on individual trades, Mondrian will consider the impact of the fee that custodians may levy for processing such transactions. Unless Mondrian has been notified otherwise, a reasonable estimate of that fee will be applied.
- Equity commission rates will be negotiated in advance annually or more frequently if necessary. Mondrian will typically agree a single flat rate of commission for each market with each broker.
- All Clients governed by the same or a similar mandate will be structured similarly (that is, will hold the same or comparable stocks), and will exhibit similar characteristics. Sale and purchase opportunities identified at regular investment committee meetings will be applied to portfolios across the board, subject to the requirements of individual client mandates and cash availability. Mondrian’s execution policy does not differentiate between Clients.
- Mondrian is not affiliated with any counterparty or venue used to execute client order.
- Mondrian does not receive payments, discounts, rebates or non-monetary benefits in its trading arrangements. Mondrian has adopted a policy to pay for all externally-acquired research directly without passing the cost on to our clients.
- The Best Execution & Trading Oversight Committee discuss and appraise execution venues in detail throughout the year. Supported by our own in house monitoring and third party independent Trade Cost Analysis, we have determined that the venues engaged with over the period are suitable counterparties to facilitate Mondrian’s execution.

Mondrian does not currently have any retail clients.

## Quantitative Analysis

| Class of Instrument   | Equities – Shares & Depository Receipts                                  |  |
|---|--|--|
| Notification if <1 average trade per business day in the previous year (Yes/No) | No   |  |
| Top 5 Venues ranked in terms of volume (descending order)                       | Proportion of volume executed as a percentage of total in that class     | Proportion of orders executed as percentage of total in that class |
| 1. Instinet Europe Limited - 213800MXAKR2LA1VBM44                               | 11.4   | 13.9   |
| 2. JP Morgan - K6Q0W1PS1L1O4IQL9C32   | 11.2   | 9.6  |
| 3. Sanford C Bernstein - 54930049G8WQ5OOUSD19                                   | 10.2   | 9.1  |
| 4. Citigroup - XKZZ2JZF41MRHTR1V493   | 10.2   | 10.2   |
| 5. Credit Lyonnais Securities Asia Limited - 213800VZMAGVIU2IJA72               | 9.7  | 12.9   |
|   |  |  |
| Class of Instrument   | Debt instruments (i) Bonds   |  |
| Notification if <1 average trade per business day in the previous year (Yes/No) | No   |  |
| Top 5 Venues ranked in terms of volume (descending order)                       | Proportion of volume executed as a percentage of total in that class     | Proportion of orders executed as percentage of total in that class |
| 1. Tradeweb - 2138001WXZQOPMPA3D50  | 46.5   | 43.3   |
| 2. JP Morgan - K6Q0W1PS1L1O4IQL9C32   | 14.3   | 13.5   |
| 3. HSBC - MP6I5ZYBUEU3UXPYFY54  | 10.3   | 12.2   |
| 4. Barclays Capital - K9WDOH4D2PYBSLSOB484                                      | 5.8  | 5.7  |
| 5. Deutsche Bank - 7LTFWZYICNSX8D621K86   | 5.0  | 6.0  |
|   |  |  |
| Class of Instrument   | Debt instruments (ii) Money markets instruments                          |  |
| Notification if <1 average trade per business day in the previous year (Yes/No) | Yes  |  |
| Top 5 Venues ranked in terms of volume (descending order)                       | Proportion of volume executed as a percentage of total in that class     | Proportion of orders executed as percentage of total in that class |
| 1. Tradeweb - 2138001WXZQOPMPA3D50  | 99.9   | 97.1   |
| 2. Deutsche Bank - 7LTFWZYICNSX8D621K86   | 0.1  | 2.9  |
| -   | -  | -  |
| -   | -  | -  |
| -   | -  | -  |
|   |  |  |
| Class of Instrument   | Currency derivatives:<br>Swaps, forwards, and other currency derivatives |  |
| Notification if <1 average trade per business day in the previous year (Yes/No) | No   |  |
| Top 5 Venues ranked in terms of volume (descending order)                       | Proportion of volume executed as a percentage of total in that class     | Proportion of orders executed as percentage of total in that class |
| 1. BONY Mellon - HPFHU0OQ28E4N0NFVK49   | 35.3   | 47.3   |
| 2. Northern Trust - 6PTKHDJ8HDF78PFWH30   | 31.3   | 16.9   |
| 3. JP Morgan - 7H6GLXDRUGQFU57RNE97   | 19.5   | 16.7   |
| 4. State Street - 571474TGEMMWANRLN572  | 5.2  | 10.5   |
| 5. Barclays Capital - G5GSEF7VJP5I7OUK5573                                      | 2.6  | 2.6  |