

# Annual Report on Top 5 Execution Venues and Qualitative Assessment of Execution

Based on trades executed between 1 January 2019 and 31 December 2019

April 2020

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## Introduction

Under the European Union’s Markets in Financial Instruments Directive and associated regulations (“MiFID II/MiFIR”), investment firms executing client orders are required to summarise and make public, on an annual basis, for each class of financial instrument, the top five execution venues in terms of trading volumes where they execute client orders in the preceding year, alongside information on the quality of execution obtained. Such information should then enable investors and the wider public to evaluate the quality of an investment firm’s execution practices.

This document consolidates the required disclosures, covering the trading activity of BlueBay Asset Management LLP and BlueBay Asset Management LLC (collectively “BlueBay”) for the period of 1 January 2019 to 31 December 2019, for the following classes of financial instruments:

- Equity – Shares and Depositary Receipts
  - Tick size liquidity bands 5 and 6 (from 2,000 trades per day);
  - Tick size liquidity bands 3 and 4 (from 80 to 1,999 trades per day); and
  - Tick size liquidity bands 1 and 2 (from 0 to 79 trades per day)
- Debt instruments
  - Bonds
- Interest rate derivatives
  - Futures and options admitted to trading on a trading venue;
  - Swaps, forwards, and other interest rates derivatives
- Credit derivatives
  - Other credit derivatives
- Currency derivatives
  - Swaps, forwards, and other currency derivatives
- Structured finance instruments
- Equity derivatives
  - Options and Futures admitted to trading on a trading venue;
  - Swaps and other equity derivatives
- Securitised Derivatives
  - Warrants and Certificate Derivatives
- Exchange traded products (exchange traded funds, exchange traded notes and exchange traded commodities)
- Securities Financing Transactions (SFTs)
  - Bonds

Top 5 execution venue reports in the remaining classes of financial instrument are not included, due to having not been traded by BlueBay during the year.

## Explanatory Statement

BlueBay has in place an Order Execution Policy (“the Policy”), which is available [here](#). The Policy is reviewed and updated at least annually. The Policy applies equally to each of BlueBay’s clients, all of whom have been categorised as Professional. The Policy is one element of BlueBay’s overall framework for the delivery of best execution to its clients. BlueBay’s best execution framework is detailed below:

- **Order Execution Policy:** BlueBay’s overarching policy framework for achieving best execution;
- **Procedures:** Desk-based guides detailing methods for achieving best execution, on a per financial instrument class basis;
- **Training:** Both conflicts of interest training, and one-to-one training between each Execution Trader and Compliance on the regulatory requirements surrounding best execution;
- **Monitoring/Surveillance:** T+1 exception-based review of Transaction Cost Analysis (TCA) data, as well as periodic reviews of best execution factors (e.g. gifts and entertainment, settlement performance, etc.);
- **Testing:** Point-in-time review of BlueBay’s best execution framework, or elements of it (e.g. counterparty order execution policy reviews);
- **Trade Execution Oversight Committee (TEOC):** Forum for the analysis, review and challenge of BlueBay’s execution framework and reporting;
- **Reporting:** Internal, client and regulatory reporting, as required by policy, contract or regulation.
- **Disclosure:** Investment Management Agreement, Prospectus, Form ADV, top five execution venue reporting and qualitative assessment (RTS 28).

BlueBay’s Trade Execution Oversight Committee (“TEOC”, or “the Committee”) assumes ownership of BlueBay’s order execution policies and arrangements, while monitoring and overseeing trading practices and making recommendations, where appropriate, to improve said trading practices.

BlueBay uses an independent transaction cost analysis (“TCA”) provider to assist with its detailed monitoring of the quality of execution obtained by its traders. However, it is important to note that TCA is only one of a number of factors that BlueBay uses to assess best execution.

## **Consolidated Qualitative Statements**

As part of the qualitative assessment of best execution, BlueBay is required to provide commentary in several non-instrument specific areas, which have been detailed below, rather than on a per class of financial instrument basis:

### **CLOSE LINKS**

BlueBay is a subsidiary of the Royal Bank of Canada (RBC), a global financial services company with a number of affiliated entities. RBC group entities may have both direct, and indirect, interests in the financial instruments and markets in which BlueBay invests for its clients and may effect transactions with those clients. RBC group entities may act in a variety of roles, including those of proprietary trader, broker, underwriter, agent or lender in connection with transactions in which BlueBay's clients have an interest, and will receive remuneration or other benefits in connection with these roles.

BlueBay's Order Execution Policy requires that trades with RBC group entities are executed on an arm's length basis and that BlueBay obtains the best possible result, taking into account price, costs, speed, likelihood of execution and settlement, size, nature of the order, or any relevant consideration.

### **CLIENT CATEGORISATION**

BlueBay does not trade on behalf of retail clients. BlueBay does not treat clients differently depending on client categorisation. All execution decisions are made by BlueBay's execution traders in accordance with BlueBay's Order Execution Policy.

### **SPECIFIC ARRANGEMENTS**

BlueBay does not receive payments, discounts, rebates or non-monetary benefits in its trading arrangements.

### **CONSOLIDATED TAPE USAGE**

Consolidated tapes were not provided for any class of financial instrument class presented during the 2019 calendar year. Should a consolidated tape become available in any applicable class of financial instrument, BlueBay will assess the utility of such a tape and, where it enables BlueBay to effectively determine and benchmark the quality of price received by execution counterparties, will utilise this information.

## Equities – Shares and Depositary Receipts

Class of Instrument		Equities – Shares and Depositary Receipts 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 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 orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders	
<b>Mariana UFP LLP</b> 213800YRA1J9QFBMU217	34.40%	59.52%	N/A	N/A	0%	
<b>Weeden &amp; Co. L.P.</b> 549300OYBLKSN8M8EW67	26.20%	14.29%	N/A	N/A	0%	
<b>Piper Jaffray &amp; Co.</b> QUQDBTUSOAKFEVMRMF78	15.87%	11.90%	N/A	N/A	0%	
<b>Citigroup Global Markets Ltd</b> XKZZ2JZF41MRHTR1V493	14.04%	9.52%	N/A	N/A	0%	
<b>Barclays Bank plc</b> G5GSEF7VJP5I7OUK5573	8.46%	2.38%	N/A	N/A	0%	

Class of Instrument		Equities – Shares and Depositary Receipts 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 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 orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders	
<b>Mariana UFP LLP</b> 213800YRA1J9QFBMU217	55.34%	46.81%	N/A	N/A	0%	
<b>Morgan Stanley &amp; Co International PLC</b> 4PQUHN3JPFGENF3BB653	44.66%	53.19%	N/A	N/A	0%	

Class of Instrument	Equities – Shares and Depository Receipts 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 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 orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
<b>Merrill Lynch International</b> GGDZP1UYGU9STUHRDP48	26.86%	7.69%	N/A	N/A	0%
<b>Citigroup Global Markets Ltd</b> XKZZ2JZF41MRHTR1V493	21.50%	19.23%	N/A	N/A	0%
<b>Piper Jaffray &amp; Co.</b> QUQDBTUSOAKFEVMRMF78	17.74%	11.54%	N/A	N/A	0%
<b>Weeden &amp; Co. L.P.</b> 549300OYBLKSN8M8EW67	11.64%	11.54%	N/A	N/A	0%
<b>Bybrook Capital Hazelton Master Fund LP</b> 5493003SGBZI2GB3GW74	6.25%	3.85%	N/A	N/A	0%

Qualitative Assessment	
<b>Execution Factors</b>	Trading in equities forms a small percentage of BlueBay’s overall trading activity. For outright equity trades, explicit costs (such as commission costs) was generally the primary execution factor. For trades in securities in less liquid regional markets, trading has generally focused on utilising domestic brokers, with superior knowledge of local markets, to help achieve best execution. When executing convertible bond orders on swap, the choice of equity counterparty was typically driven by the choice of executing broker on the bond.
<b>Change in Execution Venues</b>	There have been no material changes to trading venues or execution counterparties listed in the Order Execution Policy throughout 2019.
<b>Data and Tool Usage</b>	BlueBay utilises proprietary data, vendor-based data and TCA systems, as well as data provided by trading venues to undertake analysis of execution and assess the effectiveness of BlueBay’s execution framework.

## Debt instruments

Class of Instrument	Debt Instruments				
	Bonds				
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 orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
<b>Citigroup Global Markets Ltd</b> XKZZ2JZF41MRHTR1V493	19.24%	17.09%	N/A	N/A	0%
<b>Barclays Bank plc</b> G5GSEF7VJP5I7OUK5573	15.47%	15.95%	N/A	N/A	0%
<b>Merrill Lynch International</b> GGDZP1UYGU9STUHRDP48	11.93%	10.63%	N/A	N/A	0%
<b>HSBC Bank plc</b> MP6I5ZYZBEU3UXPYFY54	10.80%	10.18%	N/A	N/A	0%
<b>Goldman Sachs International</b> W22LROWP2IHZNBB6K528	9.55%	9.70%	N/A	N/A	0%

Qualitative Assessment	
<b>Execution Factors</b>	Typically, two primary execution factors are expected to dominate in the trading of bonds: price and size. Price is by far the most common factor when judged on number of trades as often we will look to utilise a Request for Quote protocol for trades at, or below, “normal” market size. Our preference is to request these quotes, where possible, on a multilateral trading facility such as Bloomberg, Tradeweb or MarketAxess, with several dealers in competition at the same time. Size is typically the second most common execution factor for bond trading as we often handle above “market size” orders, and our priority is to execute within suitable price context but with a preference to trade larger block sizes, often with a single dealer to prevent information leakage and utilising the risk/balance sheet of our counterparties.
<b>Change in Execution Venues</b>	There have been no material changes to trading venues or execution counterparties listed in the Order Execution Policy throughout 2019.
<b>Data and Tool Usage</b>	BlueBay utilises proprietary data, vendor-based data and TCA systems, as well as data provided by trading venues to undertake analysis of execution and assess the effectiveness of BlueBay’s execution framework.



## Interest Rate Derivatives

Class of Instrument		Interest Rate Derivatives				
		Futures and options admitted to trading on a trading venue				
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 orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders	
<b>Citigroup Global Markets Ltd</b> XKZZ2JZF41MRHTR1V493	63.30%	45.05%	N/A	N/A	0%	
<b>Credit Suisse Securities Europe Ltd</b> DL6FFRRLF74S01HE2M14	23.18%	35.09%	N/A	N/A	0%	
<b>Goldman Sachs International</b> W22LROWP2IHZNBB6K528	9.67%	12.13%	N/A	N/A	0%	
<b>Morgan Stanley &amp; Co International plc</b> 4PQUHN3JPFQFNF3BB653	3.03%	6.74%	N/A	N/A	0%	
<b>Barclays Bank PLC</b> G5GSEF7VJP5I7OUK5573	0.81%	0.11%	N/A	N/A	0%	

Class of Instrument		Interest Rate Derivatives				
		Swaps, forwards and other interest rates derivatives				
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 orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders	
<b>Barclays Bank PLC</b> G5GSEF7VJP5I7OUK5573	23.13%	6.66%	N/A	N/A	0%	
<b>Citigroup Global Markets Ltd</b> XKZZ2JZF41MRHTR1V493	21.18%	9.76%	N/A	N/A	0%	
<b>Merrill Lynch International</b> GGDZP1UYGU9STUHRDP48	19.03%	22.62%	N/A	N/A	0%	
<b>HSBC Bank Plc</b> MP6I5ZYBZEU3UXPYFY54	10.26%	21.13%	N/A	N/A	0%	
<b>JPMorgan Chase Bank London</b> 7H6GLXDRUGQF57RNE97	8.16%	15.04%	N/A	N/A	0%	

## Qualitative Assessment

<b>Execution Factors</b>	<p>For futures, BlueBay do not participate in Direct Market Access. Rather, our orders are passed through several bank counterparties. Execution costs are not a primary factor, given that we have in place a flat fee structure for all banks facilitating this process. The primary execution factor for futures is typically speed, due to the common nature of our futures orders being risk hedging against other assets. Where we trade larger strategic orders, then more priority is given to price with respect to minimising impact on market. In such situations, speed is not a factor.</p> <p>For Swaps, BlueBay will often priority size as the primary execution factor when trading Interest Rate Swaps, given that the majority of such trades are done at a block level with permitted counterparties as strategic trades, and hence information leakage becomes a concern. Request for Market rather than Request for Quote is another approach we utilise to preserve information leakage on such transactions. Appropriate documentation such as ISDAs can play a part in some situations, such as bilateral settlement and hence impact broker selection.</p>
<b>Change in Execution Venues</b>	<p>There have been no material changes to trading venues or execution counterparties listed in the Order Execution Policy throughout 2019.</p>
<b>Data and Tool Usage</b>	<p>BlueBay utilises proprietary data, vendor-based data and TCA systems, as well as data provided by trading venues to undertake analysis of execution and assess the effectiveness of BlueBay's execution framework.</p>

## Credit Derivatives

Class of Instrument	Credit derivatives				
	Futures and options admitted to trading on a trading venue				
Notification if < 1 average trade per business day in the previous year	Y				
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 orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
<b>Barclays Capital Inc.</b> AC28XWWI3WIBK2824319	61.89%	61.90%	N/A	N/A	0%
<b>Citigroup Global Markets Ltd</b> XKZZ2JZF41MRHTR1V493	38.11%	38.10%	N/A	N/A	0%

Class of Instrument	Credit derivatives				
	Other credit derivatives				
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 orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
<b>Citigroup Global Markets Ltd</b> XKZZ2JZF41MRHTR1V493	20.52%	14.48%	N/A	N/A	0%
<b>Credit Suisse International</b> E58DKGMJYYYJLN8C3868	17.47%	8.71%	N/A	N/A	0%
<b>JPMorgan Chase Bank London</b> 7H6GLXDRUGQFU57RNE97	16.19%	10.32%	N/A	N/A	0%
<b>Barclays Bank plc</b> G5GSEF7VJP5I7OUK5573	12.95%	19.05%	N/A	N/A	0%
<b>Goldman Sachs International</b> W22LROWP2IHZNBB6K528	10.20%	14.24%	N/A	N/A	0%

## Qualitative Assessment

<b>Execution Factors</b>	For normal market size trades, BlueBay will prioritise price as an execution factor, typically requesting multiple quotes on MTF venues. For above normal market size, BlueBay will typically prioritise size and limit information leakage. Appropriate documentation such as ISDAs can play a part in some situations such as bilateral settlement, and hence impact broker selection.
<b>Change in Execution Venues</b>	There have been no material changes to trading venues or execution counterparties listed in the Order Execution Policy throughout 2019.
<b>Data and Tool Usage</b>	BlueBay utilises proprietary data, vendor-based data and TCA systems, as well as data provided by trading venues to undertake analysis of execution and assess the effectiveness of BlueBay's execution framework.

## Currency Derivatives

Currency derivatives					
Class of Instrument	Swaps, forwards, and other currency derivatives				
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 orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
<b>Barclays Bank plc</b> G5GSEF7VJP5I7OUK5573	17.03%	7.31%	N/A	N/A	0%
<b>Citibank NA London</b> E57ODZWZ7FF32TWEFA76	14.35%	17.59%	N/A	N/A	0%
<b>BNP Paribas SA London</b> R0MUWSFPU8MPRO8K5P83	12.84%	17.79%	N/A	N/A	0%
<b>HSBC Bank plc</b> MP6I5ZYBZBEU3UXPYFY54	10.56%	13.51%	N/A	N/A	0%
<b>Merrill Lynch International</b> GGDZP1UYGU9STUHRDP48	10.55%	7.19%	N/A	N/A	0%

### Qualitative Assessment

<b>Execution Factors</b>	Typically, we would expect 2 primary execution factors to dominate in the trading of currency derivatives: price and size. Price is by far the most common factor when judged on number of trades, as often we will look to utilise a Request for Quote protocol for trades at, or below, “normal” market size. Our preference is to request these quotes, where possible, on a multilateral trading facility such as FX All, FX Connect or FX Go, with several dealers in competition at the same time. Size is typically the second most common factor for bond trading, as we often handle above market size orders and our priority is to execute within suitable price context, but with a preference to trade larger block sizes often with a single dealer to prevent information leakage and utilising the risk/balance sheet of our counterparties.
<b>Change in Execution Venues</b>	There have been no material changes to trading venues or execution counterparties listed in the Order Execution Policy throughout 2019.
<b>Data and Tool Usage</b>	BlueBay utilises proprietary data, vendor-based data and TCA systems, as well as data provided by trading venues to undertake analysis of execution and assess the effectiveness of BlueBay’s execution framework.

## Structured finance instruments

Class of Instrument	Structured finance instruments				
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 orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
<b>Merrill Lynch International</b> GGDZP1UYGU9STUHRDP48	16.54%	14.25%	N/A	N/A	0%
<b>Citigroup Global Markets Ltd</b> XKZZ2JZF41MRHTR1V493	15.75%	16.54%	N/A	N/A	0%
<b>BNP Paribas SA London</b> R0MUWSFPU8MPRO8K5P83	13.52%	11.20%	N/A	N/A	0%
<b>Morgan Stanley &amp; Co International plc</b> 4PQUHN3JPF GFNF3BB653	11.15%	14.25%	N/A	N/A	0%
<b>Nomura International plc</b> DGQCSV2PHVF7I2743539	10.59%	12.98%	N/A	N/A	0%

Qualitative Assessment	
<b>Execution Factors</b>	For structured credit sales, BlueBay most frequently sells via a BWIC (bids wanted in competition) process. BlueBay circulate a list widely to all our trading counterparties, as we feel this gives us quick and best execution. For purchases, BlueBay receive offer sheets from all dealers, and select counterparties based on which one has the bond we want to buy at the best level.
<b>Change in Execution Venues</b>	There have been no material changes to trading venues or execution counterparties listed in the Order Execution Policy throughout 2019.
<b>Data and Tool Usage</b>	BlueBay utilises proprietary data, vendor-based data and TCA systems, as well as data provided by trading venues to undertake analysis of execution and assess the effectiveness of BlueBay's execution framework.

## Equity Derivatives

Equity Derivatives	
Class of Instrument	Options and Futures admitted to trading on a trading venue
Notification if < 1 average trade per business day in the previous year	Y
Top 5 execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class
<b>Citigroup Global Markets Ltd</b> XKZZ2JZF41MRHTR1V493	48.00%
<b>Morgan Stanley &amp; Co International plc</b> 4PQUHN3JPF GFNF3BB653	42.97%
<b>Goldman Sachs International</b> W22LROWP2IHZNBB6K528	8.43%
<b>Barclays Bank plc</b> G5GSEF7VJP5I7OUK5573	0.57%
<b>BNP Paribas SA London</b> R0MUWSFPU8MPRO8K5P83	0.02%

Equity Derivatives	
Class of Instrument	Swaps and other equity derivatives
Notification if < 1 average trade per business day in the previous year	Y
Top 5 execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class
<b>Citigroup Global Markets Ltd</b> XKZZ2JZF41MRHTR1V493	93.07%
<b>Morgan Stanley &amp; Co International plc</b> 4PQUHN3JPF GFNF3BB653	2.96%
<b>Merrill Lynch International</b> GGDZP1UYGU9STUHRDP48	1.98%
<b>Credit Suisse Securities Europe Ltd</b> DL6FFRRLF74S01HE2M14	0.98%
<b>Credit Suisse AG London</b> ANGGYXNX0JLX3X63JN86	0.98%

## Qualitative Assessment

<b>Execution Factors</b>	Speed is the primary execution factor for the majority of trades admitted to trading venue, given our trades are typically normal market size.
<b>Change in Execution Venues</b>	There have been no material changes to trading venues or execution counterparties listed in the Order Execution Policy throughout 2019.
<b>Data and Tool Usage</b>	BlueBay utilises proprietary data, vendor-based data and TCA systems, as well as data provided by trading venues to undertake analysis of execution and assess the effectiveness of BlueBay's execution framework.



## Securitised Derivatives

Class of Instrument	Securitized Derivatives				
	Warrants and Certificate Derivatives				
Notification if < 1 average trade per business day in the previous year	Y				
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 orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Global Loan Agency Services Ltd 254900K0T09Y5JZ8HF52	100%	100%	N/A	N/A	0%

### Qualitative Assessment

Overall, trading undertaken in this class of financial instrument comprises a negligible proportion of total trading volume, and is seldom undertaken.

#### Execution Factors

Warrants are generally obtained either via participation in a challenging refinancing, where warrants are attached to the debt to provide additional financial incentive or awarded during an administration/restructuring process where creditors have taken control.

#### Change in Execution Venues

There have been no material changes to trading venues or execution counterparties listed in the Order Execution Policy throughout 2019.

#### Data and Tool Usage

BlueBay utilises proprietary data, vendor-based data and TCA systems, as well as data provided by trading venues to undertake analysis of execution and assess the effectiveness of BlueBay's execution framework.

## Exchange Traded Products

Class of Instrument	Exchange Traded Products (Exchange traded funds, exchange traded notes and exchange traded commodities)				
Notification if < 1 average trade per business day in the previous year	Y				
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 orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
<b>Internal Cross</b>	41.86%	5.88%	N/A	N/A	0%
<b>Citigroup Global Markets Ltd</b> XKZZ2JZF41MRHTR1V493	33.50%	52.94%	N/A	N/A	0%
<b>Weeden &amp; Co. L.P.</b> 549300OYBLKSN8M8EW67	12.52%	29.41%	N/A	N/A	0%
<b>Piper Jaffray &amp; Co.</b> QUQDBTUSOAKFEVMRMF78	6.18%	5.88%	N/A	N/A	0%
<b>JPMorgan Chase Bank NA</b> 7H6GLXDRUGQFU57RNE97	5.93%	5.88%	N/A	N/A	0%

### Qualitative Assessment

<b>Execution Factors</b>	The primary execution factor for Exchange Traded Product is typically price, with orders given with limits to a single broker. While transparency is typically among the highest of the asset classes traded at BlueBay, the volumes traded are typically low as a firm.
<b>Change in Execution Venues</b>	There have been no material changes to trading venues or execution counterparties listed in the Order Execution Policy throughout 2019.
<b>Data and Tool Usage</b>	BlueBay utilises proprietary data, vendor-based data and TCA systems, as well as data provided by trading venues to undertake analysis of execution and assess the effectiveness of BlueBay's execution framework.

## Securities Financing Transactions

Class of Instrument	Bonds	
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 orders executed as percentage of total in that class
<b>Citigroup Global Markets Ltd</b> XKZZ2JZF41MRHTR1V493	38.04%	24.32%
<b>Barclays Bank PLC</b> G5GSEF7VJPSI7OUK5573	12.61%	19.38%
<b>BNP Paribas SA London</b> R0MUWSFPU8MPRO8K5P83	10.57%	7.61%
<b>ING Bank NV London</b> 3TK20IVIUIJ8J3ZU0QE75	9.56%	5.77%
<b>JP Morgan Securities Plc</b> K6Q0W1PS1L1O4IQL9C32	8.58%	15.56%

### Qualitative Assessment

Trading in Securities Financing Transactions extends primarily to repos and reverse repos. Typically, two or three execution factors take precedent when trading repos. Price is generally the predominant factor when covering shorts; however, this is always considered relative to the size being offered, and sometimes the likelihood of settlement will be the prevailing factor.

#### Execution Factors

For cash financing, price and haircut are generally the predominating factors. At times, trading may take place at a higher price if the haircut is more favourable. The likelihood of settlement be more a consideration when trading at shorter settlement cycles than market convention.

#### Change in Execution Venues

There have been no material changes to trading venues or execution counterparties listed in the Order Execution Policy throughout 2019.

#### Data and Tool Usage

BlueBay utilises proprietary data, vendor-based data and TCA systems, as well as data provided by trading venues to undertake analysis of execution and assess the effectiveness of BlueBay's execution framework.

#### Other

Please note that the above table may be impacted by the presence of closing legs of transactions, and administrative closing and reopening trades.

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