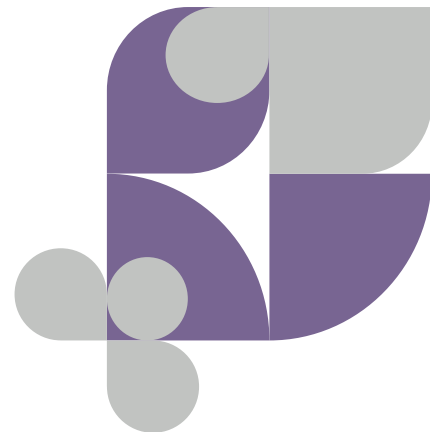


Top 5 venue report

Quality of execution



This document has been consolidated for both Rathbone Investment Management Ltd and Rathbone Unit Trust Management Ltd (Rathbones) as both entities share the same execution process and uses data from 2019. Rathbones does not execute investment orders directly with the market on behalf of clients, but passes the orders to 'execution entities' - usually a broker who will effect execution with the 'execution venue'. The purpose of this document is to provide information on the class of instruments Rathbones has dealt in and the top 5 venues utilised for each instrument.

The following analysis applies to all instruments unless specifically stated.

Execution Factors

When assessing best execution, Rathbones assigns relative importance to the following factors in the following order:

- a) Price
- b) Speed
- c) Likelihood of execution
- d) Size
- e) Nature of the order
- f) Costs

The rationale supporting the importance of each factor by asset class can be found in the Dealing and Best Execution Policy document.

Close Links, Conflicts of Interests, and Common Ownerships

The top venue for 'Other Instruments' is Rathbone Unit Trust Management Ltd. Rathbone Investment Management Ltd and Rathbone Unit Trust Management Ltd are wholly owned subsidiaries of Rathbone Brothers Plc. As noted above both entities utilise the same execution process. There is a conflict with regards Rathbone Investment Management Ltd investing in Rathbone Unit Trust Management Ltd's

funds. This is mitigated through a number of areas including a quarterly review of investment levels by senior management, the inclusion of these funds into Rathbones comprehensive research processes, Rathbone's remuneration policies, and Rathbones suitability process.

Venue Arrangements

Rathbones do not have specific arrangements with any of the venues regarding payments, rebates or non monetary benefits.

Amendments to Venues Used

No venues were added or removed in 2019. However Rathbones use the following factors when considering adding or removing venues:

- Asset Class or type
- Liquidity
- Execution ability and expertise
- Dealing visibility and service
- Arrangements to ensure quality of service
- Financial strength

Client Categorisation and Factors Given Precedence.

All Rathbones clients are currently classified as retail clients and when executing a transaction immediate price has precedence under normal circumstances. Where a client may give a specific dealing instruction

with regards to other factors this may lead to other criteria being given precedence over immediate price. However on some occasions depending upon the nature of the order we may need to take other factors into consideration. For further details please see the Best Execution Policy.

Please note that cost is not an important factor for Rathbones as they do not pass the costs of dealing directly to clients and where there are charges they are at a standard rate and not dependent upon the venue utilised.

How We Assessed and Monitored Execution

Rathbones Dealing Execution Management Committee review all venues with regards to performance and cost on a quarterly basis and venues are fully reviewed annually. Transactions undertaken on a regulated exchange are monitored

by using a third party software provider which measures trades against market patterns. The brokers we deal equities and warrants through are assessed against a number of quantitative factors, including (but not limited to) the price prevailing at the start of the order, the average price during the life of the order, and the price at the end of the order. Due to availability of information Rathbones monitor Bonds and Securitised financial instruments manually on a sample basis. Many of the securities grouped under Other Instruments are collectives and these will always be executed at the published price.

Consolidated Tape Providers

Rathbones may use consolidated tape providers to help monitor prices

Quantity of execution

The following tables show the top 5 venues Rathbones utilise for different instrument classes.

Rathbones did not trade in the following instruments.

- Money Markets Instruments
- Futures and options admitted to trading on a trading venue
- Swaps, forwards, and other interest rates derivatives
- Options and Futures admitted to trading on a trading venue
- Swaps and other equity derivatives
- Other commodities derivatives and emission allowances derivatives
- Contracts for difference
- Emission allowances

Rathbones do trade in the following instruments but at very low levels (less than 1 trade per day on average) and producing the data may give a distorted view on Rathbones trading activities in these instruments.

- Structured Finance Instruments
- Other Securitised Derivatives
- Warrants and Certificate Derivatives

Class of instrument

Equity

Tick size liquidity band	1 and 2 (from 0 to 79 trades per day)
Notification if <1 average trade per business day in the previous year	N

Top five execution venues marked in terms of trading volumes (<i>descending order</i>)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Winterflood Securities 8BRUP6V1DX3PIG2R0745	19.04%	35.77%	N/A	N/A	0.00%
Numis Securities 213800P3F4RT97WDSX47	15.04%	5.35%	N/A	N/A	0.00%
Peel Hunt LLP 5493007DWN0R4YBM4C84	6.80%	20.32%	N/A	N/A	0.00%
Wells Fargo Securities VYVCKR63DVZZN70PB21	6.59%	1.45%	N/A	N/A	0.00%
FinnCap Limited 213800DSWHX26RRA1N75	6.15%	5.78%	N/A	N/A	0.00%



Class of instrument

Equity

Tick size liquidity band	3 and 4 (from 80 to 1999 trades per day)
Notification if <1 average trade per business day in the previous year	N

Top five execution venues marked in terms of trading volumes (<i>descending order</i>)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Winterflood Securities 8BRUP6V1DX3PIG2R0745	14.98%	22.14%	N/A	N/A	0.00%
Peel Hunt LLP 5493007DWN0R4YBM4C84	13.36%	15.33%	N/A	N/A	0.00%
Numis Securities 213800P3F4RT97WDSX47	10.96%	15.27%	N/A	N/A	0.00%
Cantor Fitzgerald & Co 549300KM6VUHPKQLQX53	7.53%	5.90%	N/A	N/A	0.00%
J.P. Morgan Cazenove K6QoW1PS1L1O4IQL9C32	5.34%	5.09%	N/A	N/A	0.00%



Class of instrument

Equity

Tick size liquidity band	5 and 6 (from 2000 trades per day)
Notification if <1 average trade per business day in the previous year	N

Top five execution venues marked in terms of trading volumes (<i>descending order</i>)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Canaccord Genuity ZBU7V5NIMN4ILRFC23	16.05%	17.19%	N/A	N/A	0.00%
Winterflood Securities 8BRUP6V1DX3PIG2R0745	13.81%	8.18%	N/A	N/A	0.00%
Peel Hunt LLP 5493007DWN0R4YBM4C84	13.48%	10.38%	N/A	N/A	0.00%
Stifel Nicolaus 213800BVEFNZ8UYPKL03	9.04%	12.61%	N/A	N/A	0.00%
SG Securities Ltd O2RNE8IBXP4R0TD8PU41	8.46%	7.95%	N/A	N/A	0.00%



Class of instrument

Debt Instrument – Bonds

Notification if <1 average trade per business day in the previous year Y/N

Top five execution venues marked in terms of trading volumes (<i>descending order</i>)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Winterflood Securities 8BRUP6V1DX3PIG2R0745	21.67%	4.17%	N/A	N/A	0.00%
Peel Hunt LLP 5493007DWN0R4YBM4C84	21.63%	5.57%	N/A	N/A	0.00%
Guy Butler Ltd 213800AG2H8MB5FGJ538	13.64%	4.28%	N/A	N/A	0.00%
Bridport & Co (Jsy) Ltd 2138001S6PWXXBKX9S40	6.95%	4.56%	N/A	N/A	0.00%
Oppenheimer Europe Ltd 213800CH6IZ9J98PIS59	4.68%	11.94%	N/A	N/A	0.00%



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/N

Top five execution venues marked in terms of trading volumes (<i>descending order</i>)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
RBC Capital Markets TXDSU46SXBWIGJ8G8E98	37.56%	56.89%	N/A	N/A	0.00%
Flow Traders 549300CLJI9XDH12XV51	27.16%	17.44%	N/A	N/A	0.00%
Winterflood Securities 8BRUP6V1DX3PIG2R0745	21.13%	9.42%	N/A	N/A	0.00%
Peel Hunt LLP 5493007DWN0R4YBM4C84	5.51%	3.97%	N/A	N/A	0.00%
Mirabaud Securities 2138008Z5T61L1ZDWV35	4.27%	10.15%	N/A	N/A	0.00%



Class of instrument

Other instruments

Notification if <1 average trade per business day in the previous year Y/N

Top five execution venues marked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Rathbone Unit Trust Managers 2138002ALBZU16PET59	10.62%	15.32%	N/A	N/A	0.00%
Link Fund Solutions 213800X5W8ARSP00G16	5.25%	6.37%	N/A	N/A	0.00%
Schroder Investment Management 2138004[M63R6524XR26	4.18%	4.68%	N/A	N/A	0.00%
Aberdeen Standard Fund Managers 213800LKZU3XUL41D138	4.06%	11.03%	N/A	N/A	0.00%
JP Morgan Asset Managers (UK) 20FULDKQMC7ZL80LYR79	4.01%	5.05%	N/A	N/A	0.00%

