

DAVY UK DISCLOSURE OF TOP 5 EXECUTION VENUES 2017 (RTS 28)

RTS 28 Report for the period of 01 January 2017 - 31 December 2017

Class of instrument	Other				
Notification if <1 average trade per business day in the previous year	No				
Top five 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
Fidelity 213800AAC1A44NYZDR77	41.25%	68.02%	n/a	n/a	n/a
Old Mutual Wealth 635400C5JBLAZ15LIE80	29.32%	19.96%	n/a	n/a	n/a
Standard Life MU1J7DTC8IC8VMFT8818	28.31%	11.10%	n/a	n/a	n/a
Cofunds Limited 213800XRUPSOZUPSF553	1.00%	0.85%	n/a	n/a	n/a
Novia 213800N48MN2STVTAP44	0.12%	0.06%	n/a	n/a	n/a

Class of instrument	Structured Finance Instruments				
Notification if <1 average trade per business day in the previous year	Yes				
Top five 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
Investec 84S0VF8TSMH0T6D4K848	59.28%	50.00%	n/a	n/a	n/a
Meteor Asset Management 2138008UN4KBVG2LGA27	38.44%	37.50%	n/a	n/a	n/a
Société Générale 549300C9XEU1GRJCOQ81	2.28%	12.50%	n/a	n/a	n/a

Class of instrument	Equities				
Notification if <1 average trade per business day in the previous year	Yes				
Top five 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
Ingenious 2138002S9BLEO6AOXT43	100%	100%	n/a	n/a	n/a

J & E Davy (UK) Limited ('Davy UK')

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The publication of this information is required under the Markets in Financial Instruments Directive 2014/65/EU ('MiFID II') which took effect from 3 January 2018. We note below the information required to be provided under Article 3(3) of RTS 28, providing a summary of the analysis and conclusions drawn from Davy UK's monitoring of the quality of execution obtained on the execution venues where it executed client orders in the previous year. The extent of information available for the period is limited by the data available prior to MiFID II taking effect.

Requirements under Article 3(3)	Davy UK responses by class of instrument		
	Other (Collective Investment Schemes)	Structured finance instruments (Structured Products)	Equities (Enterprise Investment Schemes)
<p>(a) an explanation of the relative importance the 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;</p>	<p>When we arranged deals in collective investment schemes ('CIS') e.g. Unit Trusts, OEICs and Investment Trusts, we generally arranged the deals through a third party such as a platform. In some cases, deals were arranged directly with the fund manager or operator of the CIS. Our monitoring for 2017 showed that reasonable steps were taken to achieve best execution, in line with your client agreement. MiFID II requires us to take all sufficient steps to achieve best execution and our procedures have been updated accordingly.</p> <p>CIS Providers generally calculate and set their prices once a day, in accordance with the FCA requirements, over which we have</p>	<p>When we arranged deals in Structured Products we dealt directly with the product provider/administrator, who will normally execute your order on an agreed 'strike date' as detailed in the relevant prospectus or other literature and in line with their order execution policy. Your payment has been passed on to the relevant product provider/administrator in accordance with your Client Agreement. In addition to Total Consideration, the nature of the order is considered to be the most important factor when selecting the third party product provider/administrator. We are satisfied that deals in Structured Products have been executed in</p>	<p>When we arranged deals in Enterprise Investment Schemes ('EIS') dealt directly with a single EIS provider. There was insufficient volume of EIS investments arranged in 2017 to draw reliable conclusions about the quality of execution. In addition to Total Consideration, the provider's relative strength and experience in the relevant markets was considered to be the most important factor when selecting the provider, followed by other factors relevant to your order, such as financial security and tax considerations.</p>

	<p>no influence. Therefore when selecting the third party with whom we arrange a deal or to whom we transmit an order, we considered Total Consideration to be the most important factor. However, we also considered the following:</p> <ul style="list-style-type: none"> • the efficiency of transmission and execution (including method of transaction); • the nature and size of your order; • the likelihood of successful execution and settlement; and • any other relevant consideration to the execution of the order. 	<p>accordance with this principle in the period.</p>	
<p>(b) a description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders;</p>	<p>We do not have any close links, conflicts of interests or common ownerships with respect to any execution venues used to execute orders.</p>		
<p>(c) a description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received;</p>	<p>Davy UK has negotiated discounts from standard charging with certain of the third party platforms where we place orders. Any such discount applies to the charges that customers pay for using the platform; no payments are made to Davy UK by any third parties with whom we place orders. Davy UK has a policy in place setting out our approach to giving or receiving gifts, entertainment or hospitality.</p>		
<p>(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</p>	<p>As this is Davy UK's first report, there are no changes to note in the list of execution venues as per our RTS 28 Disclosure of Execution Venues.</p>		

occurred;	
(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;	Unless we state otherwise in writing, our services are provided to clients on the basis that they are Retail Clients. This means that they are afforded the greatest level of protection available under the FCA Rules. As such, all Davy clients are treated the same under its Execution Policy.
(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;	As outlined in section (a) above, total consideration is the most important factor. Other factors are taken into consideration where appropriate. For example, CIS Providers generally calculate their prices once a day and we have no influence over the price secured. However, we do take account of the overall outlay for clients in selecting the third party with whom we will place your order or to whom we will transmit your order for execution. In addition, we consider the nature and size of your order, and, where appropriate, factors to the specific order.
(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 Delegated Regulation (EU) 2017/575 [RTS 27];	At this stage, we have no reliable data to comment on the quality of execution by third parties during 2017 and so our report for the period is incomplete in this regard. We will monitor the quality of execution by third parties with whom we place your orders or to whom we transmit your orders during 2018 and make any changes we feel are necessary.
(h) where applicable, an explanation of how the investment firm has used output of a consolidated tape provider.	Not applicable.

Davy Private Clients UK is the trading name of J & E Davy (UK) Limited. J & E Davy (UK) Limited is incorporated and registered in Northern Ireland No. NI28952.

The registered office is: 7 Donegall Square North, Belfast BT1 5GB, VAT number 240872609.

J & E Davy (UK) Limited is authorised and regulated by the Financial Conduct Authority. Firm Reference Number: 172140.