

Annual Publication by Baillie Gifford Savings Management Limited of Information on the Identity of Investment Firms and the Quality of Execution (Article 65 (6) Report)



The following reports have been collated in order to enable the public and our clients to evaluate the quality of Baillie Gifford's execution practices and identify the top five investment firms in terms of trading volumes where we have placed client orders for execution.

The data relates to the calendar year 2019.

(i) Tick size liquidity bands 5 and 6 (from 2000 trades per day) Jan 1 2019 – Dec 31 2019

Class of instrument (1)	Equities – tick size liquidity bands 5 and 6	
Notification if less than 1 average trade per business day in the previous year (2)	N	
Top execution venues ranked in terms of trading volumes (descending order) (3)	Proportion of volume traded as a percentage of total in that class (4)	Proportion of orders executed as a percentage of total in that class (5)
Panmure Gordon (UK) Limited 213800GM8RB7MS4L3Z24	100.0%	100.0%

(ii) Tick size liquidity bands 3 and 4 (from 80 to 1999 trades per day) Jan 1 2019 – Dec 31 2019

Class of instrument (1)	Equities – tick size liquidity bands 3 and 4	
Notification if less than 1 average trade per business day in the previous year (2)	N	
Top execution venues ranked in terms of trading volumes (descending order) (3)	Proportion of volume traded as a percentage of total in that class (4)	Proportion of orders executed as a percentage of total in that class (5)
Cenkos Securities Plc 213800ALVRC52VN3I821	79.0%	76.4%
Canaccord Genuity Limited ZBU7V5NIMN4ILRFC23	17.5%	22.0%
Investec Bank PLC 84S0VF8TSMH0T6D4K848	3.0%	1.5%

(iii) Tick size liquidity band 1 and 2 (from 0 to 79 trades per day) Jan 1 2019 – Dec 31 2019

Class of instrument (1)	Equities – tick size liquidity bands 1 and 2	
Notification if less than 1 average trade per business day in the previous year (2)	N	
Top execution venues ranked in terms of trading volumes (descending order) (3)	Proportion of volume traded as a percentage of total in that class (4)	Proportion of orders executed as a percentage of total in that class (5)
Winterflood Securities Limited 8BRUP6V1DX3PIG2R0745	79.4%	72.3%
JPMorgan Cazenove Limited VU0BHW8GU0LCDVDEVZ11	15.0%	24.2%
Numis Securities Limited 213800P3F4RT97WDSX47	5.6%	3.5%

SUMMARY OF THE ANALYSIS AND CONCLUSIONS DRAWN FROM OUR DETAILED MONITORING OF THE QUALITY OF EXECUTION

Baillie Gifford is required to publish the following information on the quality of execution obtained on the execution venues where they executed all client orders in the previous year.

An explanation of the relative importance given to the execution factors of price, costs, speed, likelihood of execution or any other consideration including qualitative factors when assessing the quality of execution;

Orders which we receive from clients to buy or sell shares are passed by our administrator to the brokers who we have appointed to execute plan orders. We have agreements in place with these brokers and have checked that they have in place order execution policies and procedures to take all sufficient steps to obtain the best possible result for us, taking into account a variety of factors, including venue (which will typically be the London Stock Exchange), and the price and cost of the transactions.

A description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders;

Baillie Gifford does not trade with any affiliates.

A description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received;

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

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;

Brokerage firms remain on our list of execution venues subject to an authorisation and ongoing monitoring process, which includes, but is not limited to, the broker's credit worthiness and financial stability, a review of the performance of execution services provided by the broker, and the broker's ability to trade effectively on our clients' behalf.

An explanation of how order execution differs according to client categorisation, where categories of clients are treated differently and where it may affect the order execution arrangements;

All clients are treated the same.

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;

Other criteria have not been given precedence over immediate price and cost in delivering the best possible result in terms of the total consideration to clients.

An explanation of how we have used any data or tools relating to the quality of execution, including any data published under Commission Delegated Regulation (EU) 2017/575 [RTS 27];

We monitor on a regular basis the quality of execution obtained on the execution venues where client orders are executed.

Where applicable, an explanation of how the investment firm has used output of a consolidated tape provider.

This is not applicable as there are currently no consolidated tape providers in Europe.

NOTES ON THE REPORT

The information has been collated in accordance with the requirements laid down in Art 65(6) of Commission Delegated Regulation 2398 of 25 April 2016, adopted under Articles 24(1) and 24(4) of MiFID II [Markets in Financial Instruments Directive].

One report has been provided for each of class of financial instrument, traded by Baillie Gifford, on behalf of its clients.

As mandated in RTS 28, EEA traded equities, (shares and depository receipts) have been split by liquidity bands as detailed below. These are based on average daily number of transactions in the most relevant market in terms of liquidity for that instrument.

- (i) Tick size liquidity bands 5 and 6 (from 2000 trades per day)
- (ii) Tick size liquidity bands 3 and 4 (from 80 to 1999 trades per day)
- (iii) Tick size liquidity band 1 and 2 (from 0 to 79 trades per day).

Baillie Gifford Savings Management Limited only trades on behalf of 'retail clients' therefore the report has been produced in accordance with 'Table 1' requirements under RTS 28.

The distinction between 'passive' and 'aggressive' is not relevant to our trading, and therefore this column has been removed.

There have been no 'directed orders' executed on venues listed in the reports below, and therefore this column has been removed. For further information please refer to the Order Execution and Trade Handling Policy. The report covers the period up to 30 September 2019, the date on which BGSM ceased conducting regulated activities.