

Annual Publication by Baillie Gifford Overseas Limited of Information on the Identity of Execution Venues and the Quality of Execution (RTS28 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 execution venues in terms of trading volumes where we have executed client orders.

The data relates to the calendar year 2019.

(a) Equities – Shares and Depository Receipts

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

Class of instrument (1)	Equities – shares and depository receipts – tick size liquidity bands 5 and 6	
Notification if less than 1 average trade per business day in the previous year (2)	Y	
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)
JPMorgan Chase Bank, National Association (LEI) – 7H6GLXDRUGQFU57RNE97	75.79%	4.76%
Deutsche Bank Aktiengesellschaft (LEI) – 7LTFWZYICNSX8D621K86	20.87%	57.14%
Credit Suisse AG (LEI) – ANGGYXNX0JLX3X63JN86	2.65%	9.52%
Merrill Lynch International (LEI) – GGDZP1UYGU9STUHRDP48	0.26%	9.52%
Jefferies International Limited (LEI) – S5THZMDUJCTQZBTRVI98	0.25%	14.29%

(a) Equities – Shares and Depository Receipts

(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 – shares and depository receipts – tick size liquidity bands 3 and 4	
Notification if less than 1 average trade per business day in the previous year (2)	Y	
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)
Morgan Stanley & Co. International PLC (LEI) – 4PQUHN3JPFGFNF3BB653	39.61%	20.00%
UBS AG (LEI) – BFM8T61CT2L1QCCEMIK50	38.71%	20.00%
Credit Suisse AG (LEI) – ANGGYXNX0JLX3X63JN86	21.17%	40.00%
Merrill Lynch International (LEI) – GGDZP1UYGU9STUHRDP48	0.51%	20.00%

(a) Equities – Shares and Depository Receipts**(ii) Tick size liquidity bands 1 and 2 (from 0 to 79 trades per day) Jan 1 2019 – Dec 31 2019**

Class of instrument (1)	Equities – shares and depository receipts – tick size liquidity bands 1 and 2	
Notification if less than 1 average trade per business day in the previous year (2)	Y	
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)
Goldman Sachs International (LEI) – W22LROWP2IHZNBB6K528	43.54%	20.00%
Winterflood Securities Limited (LEI) – 8BRUP6V1DX3PIG2R0745	20.18%	30.00%
Merrill Lynch International (LEI) – GGDZP1UYGU9STUHRDP48	14.72%	15.00%
Peel Hunt LLP (LEI) – 5493007DWN0R4YBM4C84	10.78%	15.00%
Jefferies International Limited (LEI) – S5THZMDUJCTQZBTRVI98	9.17%	15.00%

(b) Debt instruments (i) Bonds**Jan 1 2019 – Dec 31 2019**

Class of instrument (1)	Debt instruments – bonds	
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)
Tradeweb Markets LLC (MIC) – TREU	16.25%	6.97%
MarketAxess Europe Limited (MIC) – MAEL	13.26%	39.21%
Barclays Bank Plc (LEI) – G5GSEF7VJP5I7OUK5573	10.81%	4.49%
Citigroup Global Markets Limited (LEI) – XKZZ2JZF41MRHTR1V493	9.37%	6.65%
BNP Paribas (LEI) – R0MUWSFPU8MPRO8K5P83	6.72%	2.28%

(b) Debt instruments (ii) Money Market Instruments
Jan 1 2019 – Dec 31 2019

Class of instrument (1)	Debt instruments – money market instruments	
Notification if less than 1 average trade per business day in the previous year (2)	Y	
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)
Citigroup Global Markets Limited (LEI) – XKZZ2JZF41MRHTR1V493	41.01%	13.25%
Tradeweb Markets LLC (MIC) – TREU	34.46%	71.52%
The Toronto–Dominion Bank (LEI) – PT3QB789TSUIDF371261	17.30%	4.64%
Deutsche Bank Aktiengesellschaft (LEI) – 7LTFWZYICNSX8D621K86	5.50%	3.31%
Nomura International Plc (LEI) – DGQCSV2PHVF7I2743539	0.99%	4.64%

(c) Interest Rate Derivatives (ii) Swaps, Forwards and Other Interest Rate Derivatives
Jan 1 2019 – Dec 31 2019

Class of instrument (1)	Swaps, forwards and other interest rate derivatives	
Notification if less than 1 average trade per business day in the previous year (2)	Y	
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)
Tradeweb Markets Llc (MIC) – TREU	67.71%	50.00%
Citigroup Global Markets Limited (LEI) – No LEI Code	10.30%	10.83%
Merrill Lynch International (LEI) – GGDZP1UYGU9STUHRDP48	8.59%	11.67%
Barclays Bank Plc (LEI) – G5GSEF7VJP5I7OUK5573	4.53%	10.83%
Goldman Sachs International (LEI) – W22LROWP2IHZNBB6K528	4.13%	3.33%

(e) Currency Derivatives (ii) Swaps and Forwards**Jan 1 2019 – Dec 31 2019**

Class of instrument (1)	Currency derivatives – swaps, forwards and other currency derivatives	
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)
FX CONNECT (MIC) – MFXC	100.00%	100.00%

UNDERLYING TOP FIVE COUNTERPARTIES FOR TRADES EXECUTED ON FX CONNECT**(e) Currency Derivatives (ii) Swaps and Forwards – Counterparties****Jan 1 2019 – Dec 31 2019**

Class of instrument (1)	Currency derivatives – swaps, forwards and other currency derivatives	
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)
Barclays Bank Plc (LEI) – G5GSEF7VJP5I7OUK5573	20.36%	13.14%
HSBC Bank Plc (LEI) – MP6I5ZYZBEU3UXPYFY54	18.20%	16.70%
NatWest Markets PLC (LEI) – RR3QWICWWIPCS8A4S074	16.17%	14.49%
Royal Bank of Canada (LEI) – ES7IP3U3RHIGC71XBU11	14.01%	19.05%
J.P. Morgan Securities PLC (LEI) – K6Q0W1PS1L1O4IQL9C32	12.97%	9.27%

(k) Exchange Traded Products – Funds, Notes and Commodities**Jan 1 2018 – Dec 31 2018**

Class of instrument (1)	Exchange traded products	
	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)
Notification if less than 1 average trade per business day in the previous year (2)	Y	
Top execution venues ranked in terms of trading volumes (descending order) (3)		
Citigroup Global Markets Limited (LEI) – XKZZ2JZF41MRHTR1V493	35.50%	43.94%
BNP Paribas (LEI) – R0MUWSFPU8MPRO8K5P83	26.92%	7.58%
Merrill Lynch International (LEI) – GGDZP1UYGU9STUHRDP48	26.41%	33.33%
Jefferies International Limited (LEI) – S5THZMDUJCTQZBTRVI98	8.58%	4.55%
Investment Technology Group Limited (LEI) – 213800EEC95PRUCEUP63	1.71%	9.09%

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;

The relative importance of each of these factors within our dealing process will vary depending upon a number of criteria, namely:

1. the investment intent of the investment manager who created the order at Baillie Gifford;
2. the characteristics of financial instruments that are the subject of that order; and
3. the characteristics of the execution venues to which that order can be directed.

Each client order that is transacted by our traders is inherently unique in its characteristics and market conditions are never constant. The relative importance of the execution factors is therefore variable. That said, the particular combination of total consideration (price of the instrument and costs of execution, both implicit and explicit) and size are usually the most considered factors when setting our execution strategy. Where an instrument is less liquid, then likelihood of execution becomes a more important consideration. Another factor relevant to best execution is counterparty risk, particularly in the case of instruments which are not settled by delivery versus payment. Under this scenario, our assessment of credit risk may impact on our selection of who we trade with.

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;

N/A Baillie Gifford does not trade retail client orders.

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 have used independent TCA (transaction cost analysis) providers to help us with our detailed monitoring of the quality of execution obtained on the execution venues where we execute/place for execution client orders. We have access to RTS27 data and have found the data so far to be of limited use. We anticipate it becoming more relevant as the reporting evolves.

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 RTS 28, the Regulatory Technical Standards adopted under Article 27(10)(a) 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 institutional clients, including a range of pooled investment vehicles, operated by Group entities, in the preceding year.

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).

Equities which do not trade in the EEA have not been allocated a liquidity band and have therefore been included in report (m) other instruments.

Baillie Gifford Overseas Limited only trades on behalf of 'professional clients' therefore all reports have been produced in accordance with 'Table 2' 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.

Only one venue has been recorded for (e) currency derivatives, swaps and forwards. We have provided a secondary report for this class of financial instruments detailing the top five counterparties traded with on the one venue.