

Annual Publication by Baillie Gifford Overseas Limited of Information on the Identity of Investment Firms and the Quality of Execution (Article 65 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 2021.

(a) Equities – Shares and Depository Receipts

(i) Tick size liquidity bands 5 and 6 (from 2000 trades per day) Jan 1 2021 – Dec 31 2021

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)	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)
Morgan Stanley & Co. International PLC (LEI) – 4PQUHN3JPF GFNF3BB653	19.74%	10.34%
Baillie Gifford Asia (Hong Kong) Limited (LEI) – 213800Y13J8W4SZQH402	14.81%	15.52%
UBS AG (LEI) – BFM8T61CT2L1QCCEMIK50	14.09%	11.52%
Merrill Lynch International (LEI) – GGDZP1UYGU9STUHRDP48	6.81%	7.08%
Credit Suisse AG (LEI) – ANGGYXNX0JLX3X63JN86	6.01%	7.03%

(a) Equities – Shares and Depository Receipts

(ii) Tick size liquidity bands 3 and 4 (from 80 to 1999 trades per day) Jan 1 2021 – Dec 31 2021

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)	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)
Baillie Gifford Asia (Hong Kong) Limited (LEI) – 213800Y13J8W4SZQH402	32.25%	22.11%
RBC Europe Limited (LEI) – TXDSU46SXBWIGJ8G8E98	16.75%	23.45%
Liquidnet Europe Limited (LEI) – 213800ZIRB79BE5XQM68	10.28%	19.70%
Morgan Stanley & Co. International PLC (LEI) – 4PQUHN3JPF GFNF3BB653	7.73%	3.20%
UBS AG (LEI) – BFM8T61CT2L1QCCEMIK50	4.49%	3.76%

(a) Equities – Shares and Depository Receipts**(iii) Tick size liquidity band 1 and 2 (from 0 to 79 trades per day) Jan 1 2021 – Dec 31 2021**

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)	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)
Baillie Gifford Asia (Hong Kong) Limited (LEI) – 213800Y13J8W4SZQH402	38.16%	42.55%
Goldman Sachs International (LEI) – W22LROWP2IHZNBB6K528	10.66%	7.32%
Merrill Lynch International (LEI) – GGDZP1UYGU9STUHRDP48	6.58%	4.48%
UBS AG (LEI) – BFM8T61CT2L1QCCEMIK50	5.64%	8.48%
Jefferies International Limited (LEI) – S5THZMDUJCTQZBTRVI98	5.61%	3.60%

(g) Equity Derivatives (i) Options and Futures admitted to trading on a trading venue**Jan 1 2021 – Dec 31 2021**

Class of instrument (1)	Equity derivatives – futures and options admitted to trading on a trading venue	
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)
UBS AG (LEI) – BFM8T61CT2L1QCCEMIK50	100.00%	100.00%

(m) Other Instruments
Jan 1 2021 – Dec 31 2021

Class of instrument (1)	Other 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)
Baillie Gifford Asia (Hong Kong) Limited (LEI) – 213800Y13J8W4SZQH402	20.13%	12.97%
Credit Suisse AG (LEI) – ANGGYXNX0JLX3X63JN86	8.35%	5.83%
UBS AG (LEI) – BFM8T61CT2L1QCCEMIK50	7.96%	7.10%
Liquidnet Europe Limited (LEI) – 213800ZIRB79BE5XQM68	7.85%	11.50%
Merrill Lynch International (LEI) – GGDZP1UYGU9STUHRDP48	7.19%	6.97%

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 Overseas Limited delegates responsibility for executing of Asia-Pacific securities to its wholly owned subsidiary Baillie Gifford Asia (Hong Kong) Limited.

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. The obligation to publish RTS27 data is currently suspended, we are therefore unable to utilise these reports.

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 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 investment firm has been recorded for (g) equity derivatives, (i) options and futures admitted to trading on a trading venue. We regularly consider other trading options but feel the use of a single investment firm for exchange traded derivatives continues to provide best execution and is proportionate and cost effective to our clients given our volumes of trading.