

Albemarle Asset Management Limited

RTS 28 Disclosure Report

Calendar Year Disclosure Period: 1 January to 31 December 2017

Date: 30 April 2018

Introduction

On an annual basis Albemarle Asset Management Limited (“AAM”) are required to provide additional disclosures around the execution venues utilised for each asset class and certain information on the quality of execution in line with the requirements of Regulatory Technical Standard 28 of the MiFID II regulation.

Annual qualitative disclosure on the quality of execution obtained for the purpose of RTS28/Art 65 (6)

Disclosure Period: 1 January 2017 to 31 December 2017	
General observations	<p>When making and executing investment decisions, AAM traders are required to act in good faith and in the best interests of their clients, the funds. With respect to execution, this is achieved by taking all sufficient steps, as required under the FCA rules, to obtain the best possible result for the clients, taking into account the relative importance of the Execution Factors below.</p> <p>AAM monitors the effectiveness of its order execution arrangements to identify and, where necessary, corrects any deficiencies. There were no deficiencies identified during the reporting period. No single counterparty is favoured compared to others, unless it can be demonstrated that such counterparty consistently provides a superior service, which would include, for example, providing better pricing, liquidity or speed of execution than its competitors. There were no material changes to AAM’s execution arrangements during the reporting period.</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>In circumstances where trades fall inside the scope of best execution under MiFID, the ranking of the Execution Factors will typically be as follows:</p> <ul style="list-style-type: none"> • Price • Speed and/or likelihood of execution

	<ul style="list-style-type: none"> • The impact on market prices of executing an order or part of an order; • The availability of price improvement (the opportunity for an order to be executed at a better price than what is currently quoted publicly); and • Any other consideration relevant to the efficient execution of the order. <p>The remaining Execution Factors, such as costs, nature of the order and other considerations relevant to the efficient execution of Client transactions are generally given equal ranking. However, where Clients gave the Firm specific instructions as to how they require the transactions to be executed, the duty of best execution was limited to those matters which are not covered by specific instructions.</p>
(b) a description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders;	The Firm did trade with an affiliate, AC Global Markets Limited until September 2017, when following a change of control this arrangement was terminated. Since this date, the Firm does not trade with any affiliates.
(c) a description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received;	The Firm does not receive payments, discounts, rebates or non-monetary benefits in its trading arrangements.
(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 occurred;	Counterparty banks and venues remain on our list of execution venues subject to an authorisation and ongoing monitoring process, which includes, but is not limited to, the counterparty's credit worthiness and financial stability, performance of execution and suitability in relation to the overall execution process.
(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;	All clients are treated the same.
(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;	This is not applicable, as the Firm does not trade retail client orders.
(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]	During 2017, the Firm did not use any third party data and/or tools relating to quality of execution during the relevant period.
(h) 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.

Top 5 Execution Venues:

Equities – shares and depository receipts (Tick size liquidity bands 5 and 6)					
CLASS OF INSTRUMENT					
NOTIFICATION IF < 1 AVERAGE TRADE PER BUSINESS DAY IN PREVIOUS YEAR					
TOP 5 EXECUTION VENUES RANKED IN TERMS OF TRADING VOLUMES (DESCENDING ORDER)	PROPORTION OF VOLUME TRADED AS % OF TOTAL IN THAT CLASS	PROPORTION OF ORDERS EXECUTED AS % OF TOTAL IN THAT CLASS	PERCENTAGE OF PASSIVE ORDERS	PERCENTAGE OF AGGRESSIVE ORDERS	PERCENTAGE OF DIRECTED ORDERS
NAME AND VENUE IDENTIFIER (MIC OR LEI)					
Barclays Capital Securities Limited - K9WDOH4D2PYBSLSOB484	45%	42%	N/A	N/A	0.00%
IBP Markets Ltd (AC Global Markets Ltd) - 213800Y7WLJILTZZ5I67	15%	18%	N/A	N/A	0.00%
Merrill Lynch International - GGDZP1UYGU9STUHRDP48	14%	10%	N/A	N/A	0.00%
Kepler Chevreux - 9695005EOZG9X8IRJD84	12%	18%	N/A	N/A	0.00%
Intermonte SIM S.p.A. - YMUU1WGHJKORF9E36I98	6%	4%	N/A	N/A	0/00%

Equities- shares and depositary receipts (Tick size liquidity bands 3 and 4)					
CLASS OF INSTRUMENT					
NOTIFICATION IF < 1 AVERAGE TRADE PER BUSINESS DAY IN PREVIOUS YEAR					
TOP 5 EXECUTION VENUES RANKED IN TERMS OF TRADING VOLUMES (DESCENDING ORDER)	PROPORTION OF VOLUME TRADED AS % OF TOTAL IN THAT CLASS	PROPORTION OF ORDERS EXECUTED AS % OF TOTAL IN THAT CLASS	PERCENTAGE OF PASSIVE ORDERS	PERCENTAGE OF AGGRESSIVE ORDERS	PERCENTAGE OF DIRECTED ORDERS
NAME AND VENUE IDENTIFIER (MIC OR LEI)					
Barclays Capital Securities Limited - K9WDOH4D2PYBSLSOB484	31%	31%	N/A	N/A	0.00%
Kepler Chevreux - 9695005EOZG9X8IRJD84	20%	23%	N/A	N/A	0.00%
IBP Markets Ltd (AC Global Markets Ltd) - 213800Y7WLJILTZZ5I67	17%	22%	N/A	N/A	0.00%
Intermonte SIM S.p.A. - YMUU1WGHJKORF9E36I98	16%	11%	N/A	N/A	0.00%
Merrill Lynch International - GGDZP1UYGU9STUHRDP48	3%		N/A	N/A	0.00%
Baader Bank Aktiengesellschaft - 529900JFOPPEDUR61H13		4%	N/A	N/A	0.00%

Equities – shares and depositary receipts (Tick size liquidity bands 1 and 2)					
CLASS OF INSTRUMENT					
NOTIFICATION IF < 1 AVERAGE TRADE PER BUSINESS DAY IN PREVIOUS YEAR					
TOP 5 EXECUTION VENUES RANKED IN TERMS OF TRADING VOLUMES (DESCENDING ORDER)	PROPORTION OF VOLUME TRADED AS % OF TOTAL IN THAT CLASS	PROPORTION OF ORDERS EXECUTED AS % OF TOTAL IN THAT CLASS	PERCENTAGE OF PASSIVE ORDERS	PERCENTAGE OF AGGRESSIVE ORDERS	PERCENTAGE OF DIRECTED ORDERS
NAME AND VENUE IDENTIFIER (MIC OR LEI)					
IBP Markets Ltd (AC Global Markets Ltd) - 213800Y7WLJILTZZ5I67	68%	67%	N/A	N/A	0.00%
Kepler Chevreux - 9695005EOZG9X8IRJD84	32%	33%	N/A	N/A	0.00%

Exchange Traded Products					
CLASS OF INSTRUMENT					
NOTIFICATION IF < 1 AVERAGE TRADE PER BUSINESS DAY IN PREVIOUS YEAR					
TOP 5 EXECUTION VENUES RANKED IN TERMS OF TRADING VOLUMES (DESCENDING ORDER)	PROPORTION OF VOLUME TRADED AS % OF TOTAL IN THAT CLASS	PROPORTION OF ORDERS EXECUTED AS % OF TOTAL IN THAT CLASS	PERCENTAGE OF PASSIVE ORDERS	PERCENTAGE OF AGGRESSIVE ORDERS	PERCENTAGE OF DIRECTED ORDERS
NAME AND VENUE IDENTIFIER (MIC OR LEI)					
IBP Markets Ltd (AC Global Markets Ltd) - 213800Y7WLJILTZZ5I67	45%	46%	N/A	N/A	0.00%
Barclays Capital Securities Limited - K9WDOH4D2PYBSLSOB484	32%	34%	N/A	N/A	0.00%
J.P. Morgan Securities PLC - K6Q0W1PS1L1O4IQL9C32	15%	14%	N/A	N/A	0.00%
Kepler Chevreux - 9695005EOZG9X8IRJD84	8%	6%	N/A	N/A	0.00%

CLASS OF INSTRUMENT					
Equity Derivatives					
NOTIFICATION IF < 1 AVERAGE TRADE PER BUSINESS DAY IN PREVIOUS YEAR					
TOP 5 EXECUTION VENUES RANKED IN TERMS OF TRADING VOLUMES (DESCENDING ORDER)	PROPORTION OF VOLUME TRADED AS % OF TOTAL IN THAT CLASS	PROPORTION OF ORDERS EXECUTED AS % OF TOTAL IN THAT CLASS	PERCENTAGE OF PASSIVE ORDERS	PERCENTAGE OF AGGRESSIVE ORDERS	PERCENTAGE OF DIRECTED ORDERS
NAME AND VENUE IDENTIFIER (MIC OR LEI)					
Banque SYZ SA - 54930077IZ2P7FXZ1K36	1%	2%	N/A	N/A	0.00%
Banca IMI S.P.A - QV4Q8OGJ7OA6PA8SCM14	98%	98%	N/A	N/A	0.00%
Morgan Stanley & Co. International PLC - 4PQUHN3JPFGFNF3BB653	1%	0%	N/A	N/A	0.00%

Interest Rates Derivatives					
CLASS OF INSTRUMENT					
NOTIFICATION IF < 1 AVERAGE TRADE PER BUSINESS DAY IN PREVIOUS YEAR					
TOP 5 EXECUTION VENUES RANKED IN TERMS OF TRADING VOLUMES (DESCENDING ORDER)	PROPORTION OF VOLUME TRADED AS % OF TOTAL IN THAT CLASS	PROPORTION OF ORDERS EXECUTED AS % OF TOTAL IN THAT CLASS	PERCENTAGE OF PASSIVE ORDERS	PERCENTAGE OF AGGRESSIVE ORDERS	PERCENTAGE OF DIRECTED ORDERS
NAME AND VENUE IDENTIFIER (MIC OR LEI)					
Banque SYZ SA - 54930077IZ2P7FXZ1K36	17%	18%	N/A	N/A	0.00%
Banca IMI S.P.A - QV4Q8OGJ7OA6PA8SCM14	75%	73%	N/A	N/A	0.00%
Morgan Stanley & Co. International PLC - 4PQUHN3JPFGFNF3BB653	8%	9%	N/A	N/A	0.00%

CLASS OF INSTRUMENT		Debt Instruments				
NOTIFICATION IF < 1 AVERAGE TRADE PER BUSINESS DAY IN PREVIOUS YEAR						
TOP 5 EXECUTION VENUES RANKED IN TERMS OF TRADING VOLUMES (DESCENDING ORDER)	PROPORTION OF VOLUME TRADED AS % OF TOTAL IN THAT CLASS	PROPORTION OF ORDERS EXECUTED AS % OF TOTAL IN THAT CLASS	PERCENTAGE OF PASSIVE ORDERS	PERCENTAGE OF AGGRESSIVE ORDERS	PERCENTAGE OF DIRECTED ORDERS	
NAME AND VENUE IDENTIFIER (MIC OR LEI)						
IBP Markets Ltd (AC Global Markets Ltd) - 213800Y7WLJILTZZ5I67	28%	31%	N/A	N/A	0.00%	
Barclays Capital Securities Limited - K9WDOH4D2PYBSLSOB484	20%	17%	N/A	N/A	0.00%	
J.P. Morgan Securities PLC - K6Q0W1PS1L1O4IQL9C32	20%	17%	N/A	N/A	0.00%	
Natwest Markets PLC - RR3QWICWWIPCS8A4S074	10%	11%	N/A	N/A	0.00%	
Société Générale SA - O2RNE8IBXP4R0TD8PU41	7%	6%	N/A	N/A	0.00%	