

FOR PROFESSIONAL CLIENTS AND QUALIFIED INVESTORS ONLY
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Article (65)6 / RTS 28: annual report 2019

Top 5 venues best execution

May 2020



All venue reporting categories commentary

MiFID II requires investment firms who execute client orders, to summarise and make public on an annual basis for each class of financial instrument, the top five execution venues in terms of trading volumes where they executed client orders in the preceding year and information on the quality of execution obtained. Below please find our annual Article (65)6 and RTS28 Report for 2019.

The following commentary applies to all our trading for each venue reporting category unless otherwise noted in the specific venue reporting category commentary.

For cash equity and FX trades undertaken during 2019, we are reporting the counterparties we traded with and not the end venues where our counterparts will have executed our order.

Close links, conflicts of interest or common ownership with execution venues

Insight¹ is a separate asset manager within the BNY Mellon Asset Management (BNYM) boutique structure and is located in its own secure premises. The organisational structure, and hence the operational independence of each of the boutiques, is such that conflicts are unlikely to arise between the separate businesses. Effective Chinese Walls are in place between BNYM, the other investment management boutiques and Insight to manage potential conflicts should they arise. Insight operates procedures to ensure the prompt, fair and expeditious execution and allocation of client orders relative to other client orders. Insight does not trade for its own accounts; however, revenue hedging is performed for the holding company (Insight Investment Management Limited) with no preferential handling of orders. In 2019, we did not execute any client trades with BNYM.

Insight does not have any close links, common ownership or arrangements concerning rebates with respect to any execution venue used to execute orders. In addition, the inducement and research rules of the Financial Conduct Authority (FCA), prohibits investment firms which carry out portfolio management services from receiving inducements (other than acceptable minor non-monetary benefits) in relation to those services. Minor non-monetary benefits must be of a scale and nature that could not be judged to impair Insight's compliance with its duty to act honestly, fairly and professionally in the best interests of the client. Insight monitors non-monetary benefits through its Research Policy. Insight also monitors and requires pre-clearance of gifts and entertainment above certain thresholds to ensure that Insight is not induced to use one execution venue over another.

Client categorisation

Insights Order Execution Policy does not treat different categories of clients differently. We follow a consistent approach across our client base whilst ensuring we comply with any client specific regulation (for example ERISA and 1940 Act regulations). For derivative and repo products that trade under legal agreements such as IDSAs or GMRA and our trading is limited to counterparties with whom we have that documentation in place.

Execution monitoring processes

For best execution monitoring, we operate a two-tier process using a first and second line of defence model. The Head of Trading is responsible for first line of defence monitoring of best execution and delivering the best execution strategy. Additional second line of defence monitoring is undertaken by our Compliance team.

First line of defence monitoring is achieved through exception monitoring of traded prices / spreads, counterparty hit ratio monitoring and various other analytics used to identify patterns and anomalies in our trading outcomes. Tolerances are used to identify trades which have been executed outside a specific range compared to a number of benchmarks some of which are asset class specific and tailored to fit the characteristics of the asset class in question. These benchmarks include, but are not limited to, the market price / benchmark price at point of execution, arrival price, market close, market

¹ Insight is the corporate brand for certain companies operated by Insight Investment Management Limited (IIML). Insight includes, among others, Insight Investment Management (Global) Limited (IIMG), Insight Investment International Limited (IIIL), Insight Investment Management (Europe) Limited (IIMEL) and Insight North America LLC (INA), each of which provides asset management services.

price at time trade is completed, VWAP, TWAP, our TCA providers expected market impact benchmark data and Implementation shortfall. The price and basis point tolerance ranges are proposed by our Trading Analysts and or the trading head for each desk and are approved by the Head of Trading and the Trading Oversight Committee (TOC). Trades that fall outside the agreed tolerances are highlighted by our independent third-party transaction cost analysis (TCA) providers and are assessed by our traders and trading analysts. Our aim is to in as many instances as possible capture and record data along the lifecycle of a trade so that sufficient information is attached to the trade to help explain the circumstances of a trade. However, when an exception is generated, the trader reviews the trade and the corresponding execution factors documented at point of trade adding further explanation as required. A final review, sign off and categorisation of each exception is undertaken by the Head of Trading or Trading Analysts.

Where a fair value price comparison is not available (e.g. through TCA), for example some of the less liquid products we trade, Compliance will review a sample of these trades to ensure that best execution can be demonstrated. The testing frequency and sample sizes are driven by a risk-based approach as well as taking into consideration if the instrument being reviewed was traded as part of a package trade. All testing undertaken is designed to consider the relevance of all best execution factors in determining the exact approach to be followed per asset class. Exception based monitoring in addition to TCA statistical data is used to analyse our execution quality and venue selection. Analysis is presented to the trading oversight committee (TOC) on a monthly basis where the committee reviews and can recommend changes to or approve execution strategies, processes and venue selection.

For products where algorithms may be used to execute our trades, separate quarterly meetings are held to review all of our algorithmic trading. Attendees at these algorithm review meetings are the Head of Trading, the Head of Front Office Compliance, Heads of Trading desks, our Trading Analysts and other Traders as required. The reviews comprise an assessment of execution quality versus expected outcome, signalling risk and performance as measured by our TCA providers. The findings of these reviews are presented to the TOC.

Periodically we undertake deep dives into trading outcomes in specific asset classes, from specific trading venues, trading styles or trades for a specific fund in a time period. The aim is to double check that our order execution policies are effective and to analyse if we can use the output from these deep dives to help refine or improve any aspects of our trading processes.

Assessment of execution quality obtained across all products

As buy-side traders, we are subject to factors we can influence and factors outside our control but that we can anticipate and respond to. Factors that we can influence include the trade presentation style we utilise, the speed of execution, venue and counterparty choice, how passively or aggressively we work our order, the quality of our trade management tools and the ability of our traders. Factors outside our control but which we can respond to can include market and product volatility, positioning and order flow in the market place from other participants in the same product we are trading. This means that the execution methodology, cost to trade and outcome achieved for identical trades that are undertaken at different times may differ because of the effect of those variables. For example, if we are selling a stock at a time where there is an excess of buyers over sellers present in the market then we can adjust our order presentation to take advantage of that favourable positioning. However, if we are selling at a time when everyone else is selling then we will again tailor our trading style to reflect that market circumstance but our trading costs may be greater than if we were the only seller.

Post trade we use two external TCA providers, a range of internal monitoring processes, counterparties RTS27 reports, available execution venue trading analysis reports and any bespoke trading analysis reports that counterparties produced for Insight to help us assess the quality of our executions achieved. Trades that look potentially more expensive than we would have expected are highlighted and investigated and any lessons that can be learnt are fed back to trading teams and portfolio managers. Whilst it's always possible to improve on one's outcome, the evidence from our post trade analysis (which includes peer analysis where available) is that we are achieving consistently competitive trading outcomes for our clients. However, we remain vigilant and continue to constantly monitor our counterparties, venues, trading styles and outcomes to ensure we deliver consistently excellent outcomes to our clients.

RTS27 reports: Where available we have assessed counterparties RTS27 reports as part of our pre and post trade analysis. Our aim was to see if we could observe any statistically relevant data, patterns or outcomes that could be usefully incorporated into our pre trade decision making processes. In addition, some venues and counterparties provide us with more frequent Insight specific trading analysis and the output from these reports is analysed. Whilst the

counterpart RTS27 reports have been of some use we have found the ability to compare and contrast these reports and the overall usefulness of them to be constrained by both the lack of context behind all trades being assessed and by the fact that counterparts reports are not always directly comparable. We therefore attach more weight to our own internal analysis and our external TCA providers analysis when assessing venues and trading outcomes.

General disclosures

For some products we traded with more than one legal entity within a counterparty group. In these instances, we have consolidated our reporting at group level as there were some counterparties who would have fallen outside the top five at legal entity level but inside at group level. We feel reporting at group level facilitates more effective comparisons of total turnover across counterparties.

Passive and aggressive reporting: We have not reported passive and aggressive outcomes within our trading statistics because where we trade using low touch broker algorithms our broker is providing DEA (direct electronic access) and as member of the exchanges or venues and it is their routers that are deciding whether to sit passively on the exchange or take liquidity aggressively. Though these liquidity indicators are fed back to and consumed by us, it is not Insight who is directly accessing the venues and thus it is the brokers who should report the passive / aggressive statistics in their RTS27 reports.

Lettering of the venue top five reports: Readers will notice that we have skipped several letters of the alphabet when labelling the asset categories below. This is because we have followed the ESMA lettering for each asset class and have omitted those asset classes where we had no trading volumes in 2019.

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a) Equity: shares and depositary receipts

Relative Importance given to the Execution factors

For equities, price and size were our most important execution factors, however the whole context of each order is always considered as there are occasions where speed and likelihood of execution are given increasing importance. In addition Fund Manager limits or instructions will form part of the execution strategy decision making process where specific parameters or requirements of a trade may influence our decision to trade high touch for example interacting with a brokers risk price or low touch for example executing via a brokers algorithm.

Quality of execution

Pre trade we used a number of tools to help determine positioning and availability of IOI's (indications of interest), this data is used by our traders to help determine their trade presentation strategies. Post trade we used Bloomberg BTCA to analyse our achieved executions which were measured against a number of benchmarks which included arrival price, executed price and expected market impact. Where available, we used trading venues peer comparison data to further benchmark our outcomes. In addition we monitored counterparty turnover, venue performance, counterparty hit ratios and concentrations.

Separate and specific reviews are undertaken of all our trades executed via a broker provided algorithm and each algorithm's outcomes is reviewed against expected outcomes and peer providers outcomes.

Our analysis showed that we achieved consistently competitive outcomes for our trading activities in 2019.

Execution venues

In 2019 we added two new equity brokers and we removed eight brokers following mergers, a counterparty restructure and for lack of use.

Note that in some of our top five reports below one or two individual brokers have captured a large percentage of our total number or value of orders. This resulted from a number of programme trades where our strategy was to trade a basket of equities against their underlying index which often led to a high number of trades with a lower overall value being printed. Each of these programme trades was worked with a single broker (not always the same broker) with a zero slippage limit. Additionally these programme trades had the capacity to affect our trading statistics as we did not trade a large amount of outright physical equities in 2019.

Notification if <1 average trade per business day in the previous year: N

Top 5 venues ranked in terms of volume (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 directed orders
JPMorgan Chase & Co (815DZWZKVSZI1NUHU748)	20.45%	9.55%	0.00%
UBS Group AG (549300SZJ9VS8SGXAN81)	15.14%	56.56%	0.00%
Royal Bank of Canada (ES7IP3U3RHIGC71XBU11)	10.32%	1.79%	0.00%
Numis Corp PLC (213800ARWWDZZCNBHD25)	10.27%	1.79%	0.00%
Barclays Plc (213800LBQA1Y9L22JB70)	7.16%	13.57%	0.00%

i) Tick size liquidity band 5 – 6

Tick size liquidity bands 5 and 6, from 2,000 trades per day.

Notification if <1 average trade per business day in the previous year: N

Top 5 venues ranked in terms of volume (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 directed orders
UBS Group AG (549300SZJ9VS8SGXAN81)	22.83%	70.99%	0.00%
Barclays Plc (213800LBQA1Y9L22JB70)	20.91%	18.60%	0.00%
Numis Corp PLC (213800ARWWDZZCNBHD25)	15.17%	0.41%	0.00%
JPMorgan Chase & Co (8I5DZWZKVSZI1NUHU748)	7.95%	3.22%	0.00%
Royal Bank of Canada (ES7IP3U3RHIGC71XBU11)	7.01%	0.83%	0.00%

ii) Tick size liquidity band 3 – 4

Tick size liquidity bands 3 and 4, from 80 to 1,999 trades per day.

Notification if <1 average trade per business day in the previous year: N

Top 5 venues ranked in terms of volume (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 directed orders
Royal Bank of Canada (ES7IP3U3RHIGC71XBU11)	25.21%	4.17%	0.00%
Numis Corp PLC (213800ARWWDZZCNBHD25)	16.49%	7.41%	0.00%
Virtu Financial Inc (5493001OPW2K42CH3884)	13.02%	4.63%	0.00%
Jefferies LLC (58PU97L1C0WSRCWADL48)	11.56%	8.33%	0.00%
JPMorgan Chase & Co (8I5DZWZKVSZI1NUHU748)	8.03%	6.02%	0.00%

iii) Tick size liquidity band 1 – 2

Tick size liquidity bands 1 and 2, from zero to 79 trades per day.

Notification if <1 average trade per business day in the previous year: N

Top 5 venues ranked in terms of volume (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 directed orders
JPMorgan Chase & Co (8I5DZWZKVSZI1NUHU748)	62.34%	50.93%	0.00%
Redburn Europe Ltd (213800PKEJQZQXQCOJ04)	8.69%	7.48%	0.00%
Liberum Capital Limited (213800U6KUF87S1KCC03)	5.99%	3.27%	0.00%
Numis Corp PLC (213800ARWWDZZCNBHD25)	5.12%	5.14%	0.00%
Royal Bank of Canada (ES7IP3U3RHIGC71XBU11)	4.79%	6.07%	0.00%

iv) Tick size liquidity band other

Tick banding other: any instrument that does not have a current tick banding.

Notification if <1 average trade per business day in the previous year: N

Top 5 venues ranked in terms of volume (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 directed orders
Bank of America Corp (9DJT3UXIJIZJI4WXO774)	18.68%	4.67%	0.00%
Citigroup Inc (6SHGI4ZSSLCXXQSBB395)	12.12%	4.00%	0.00%
BMO Capital Markets Corp (RUC0QBLBRPCU4W1NE59)	11.51%	2.67%	0.00%
Deutsche Bank AG (7LTWFZYICNSX8D621K86)	9.46%	2.67%	0.00%
UBS Group AG (549300SZJ9VS8SGXAN81)	8.10%	66.67%	0.00%

b) Debt instruments

i) Bonds

Relative importance given to the execution factors

Price and liquidity were our most important execution factors. The best price in a market usually represents an opportunity to trade in a particular size. Where we have orders larger than this size, the consideration of size as a factor increased in importance, however price was always our primary consideration. Other factors such as speed of execution, market positioning and the likelihood of execution and settlement were always considered by our traders. These additional factors generally assumed greater importance for less liquid bonds but their importance for all bonds varied in response to changing market and order characteristics.

Quality of execution

Pre trade we used a number of positioning tools such as Neptune and data from available electronic execution venues to help our traders determine their trade presentation strategies. Post trade we used external TCA providers (Bloomberg BTCA to May 2019 and BestX from May 2019 onwards) to analyse our achieved executions which were measured against a number of benchmarks. Where available we used trading venues peer comparison data to further benchmark our outcomes. In addition, we monitored counterparty turnover, hit ratios and concentrations. Our internal and external analysis shows we achieved consistently competitive outcomes for our trading activities.

Execution venues

During the course of 2019 we added 28 fixed income counterparties mostly regional subsidiaries of existing counterparties but also a number of specialist convertible bond counterparties. We removed five counterparties because of lack of use. The percentages attributed to the four execution venues mentioned below do not add up to 100% this is because a portion of our trading was executed and confirmed directly with counterparties and not via an execution venue. Note the Bloomberg volumes below comprises process trades that were initially negotiated by phone but then affirmed electronically. The Tradeweb and MarketAxess volumes were all trades that were fully quoted and traded via those electronic execution platforms.

Notification if <1 average trade per business day in the previous year: N

Top 5 venues ranked in terms of volume (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 directed orders
NatWest Markets Plc (RR3QWICWWIPCS8A4S074)	9.92%	4.26%	0.00%
Morgan Stanley (IGJSJL3JD5P30I6NJZ34)	8.22%	8.95%	0.00%
HSBC Holdings PLC (MLU0ZO3ML4LN2LL2TL39)	7.90%	6.31%	0.00%
Barclays Plc (213800LBQA1Y9L22JB70)	7.84%	7.44%	0.00%
Goldman Sachs Group Inc (784F5XWPLTWKTBV3E584)	7.79%	6.93%	0.00%

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Top 5 venues ranked in terms of volume (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 directed orders
Bloomberg	33.21%	45.94%	0.00%
TradeWeb	28.55%	37.73%	0.00%
MarketAxcess	0.32%	5.54%	0.00%
LiquidNet	0.12%	0.33%	0.00%

ii) Money market instruments

Relative importance given to the execution factors

For money market transactions, which include Certificates of Deposit, Commercial Paper, Floating Rate Notes and Agency Paper, price, counterparty exposure and issuer credit ratings were our most important execution factors.

For listed securities, where they are available, quotes were obtained from competing counterparties and trades were concluded through the counterparties that provided the best price. For instruments that give an ongoing exposure to the issuer such as CDs, counterparty exposure is as least as important as price and often was our key execution factor as we look to ensure we sufficiently diversified our ongoing counterparty exposures. In addition issuer credit ratings and our internal analysis of each credit were taken into account when making investment selection decisions.

Our execution policy does not treat different categories of clients differently. We trade both directly with counterparts and also via money market brokers/dealers.

It should be noted that the duration of the instrument purchased can affect our counterparty turnover numbers. For example if we purchased a six month CD and rolled it once in the year into another six month CD this would give the same next exposure to the issuer as having a three month CD of the same notional size and rolling it three times in the year yet the counterparty turnover will show as double for the three month instrument as we rolled it more frequently.

Quality of execution

For money market instruments an assessment of the outcome must consider the yield achieved in relation to the credit rating and our assessment of creditworthiness of the issuer and the duration of the instrument being traded. Most money market instruments are effectively new securities created at the point of execution and our external TCA providers do not cover these instruments, we therefore monitored our execution quality internally. Counterparty exposure, turnover and hit ratios were all monitored. In addition we plotted yields achieved against maturity and issuer rating and any outliers were challenged with our traders.

Our monitoring shows that we consistently achieved competitive outcomes for our clients.

Execution venues

We added two brokers to our panel of counterparties and money brokers in 2019, no counterparties were removed. Counterparty and issuer exposure limits are actively reviewed and several issuer specific exposure limit increases and decreases were made in 2019.

Notification if <1 average trade per business day in the previous year: N

Top 5 venues ranked in terms of volume (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 directed orders
Bred Banque (NICH5Q04ADUV9SN3Q390)	23.64%	19.78%	0.00%
Tradition London Clearing (969500CFFF1XKRFIXJ90)	10.49%	5.65%	0.00%
Tullett Prebon Securities Ltd (5493009UWRK48KKUD358)	7.93%	4.56%	0.00%
Bank of America Corp (9DJT3UXIJIZJI4WXO774)	7.88%	8.58%	0.00%
JPMorgan Chase & Co (8I5DZWZKVSZI1NUHU748)	6.27%	6.55%	0.00%

c) Interest rate derivatives

i) Futures and options admitted to trading on a trading venue

Relative importance given to the execution factors

For bond futures and options, price and liquidity were typically the most important execution factors. The best price in a market usually represents an opportunity to trade in a particular size, where we have orders larger than this size, size, speed and the need to manage information leakage increased in importance; however price was always the primary consideration. Secondary factors such as speed of execution, market positioning, ability to price block trades for larger orders and the likelihood of execution may also direct Insight to use a particular execution strategy or counterparty.

Quality of execution

We used external TCA providers (Bloomberg BTCA until May 2019 and BestX from May 2019 onwards) to review our futures and options trades, exception and total cost based monitoring was undertaken against a number of benchmarks. In addition we monitored internally the cost and outcomes of our block trades that we executed on a principal basis with counterparties.

The monitoring undertaken confirmed that we consistently achieved competitive outcomes for our clients.

Execution venues

We made no changes to our counterparty panel in 2019.

Notification if <1 average trade per business day in the previous year: N

Top 5 venues ranked in terms of volume (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 directed orders
Bank of America Corp (9DJT3UXIJIZJI4WXO774)	23.35%	15.06%	0.00%
JPMorgan Chase & Co (8I5DZWZKVSZI1NUHU748)	18.95%	20.35%	28.03%
Goldman Sachs Group Inc (784F5XWPLTWKTBV3E584)	18.18%	31.65%	7.12%
Morgan Stanley (IGJSJL3JD5P30I6NJZ34)	16.72%	20.76%	0.00%
Citigroup Inc (6SHGI4ZSSLCXXQSBB395)	15.05%	4.76%	0.00%

ii) Swaps, forwards, and other interest rate derivatives

Relative importance given to the execution factors

For interest rate swaps, forwards and other interest rate derivatives, price and size were our most important execution factors. Where market reference pricing data was available, including but not limited to, interest rates, our traders analysed the available data and competing spreads from the universe of available counterparties to model a transaction and establish a mid-price position. This data is recorded within internal systems. Once the model price is established, client orders were executed with those counterparties which offered the best price taking into account other best execution factors such as liquidity, size of order, counterparty restrictions, the need to manage the risk of information leakage and other implicit costs of trading.

In addition, counterparties were selected based upon other factors such as the ISDA and swap agreements in place, which may limit the number of available counterparties, fund manager limits or any client instructions or limits and underlying market conditions.

Quality of execution

Our IRS monitoring was undertaken internally with trades being assessed against a number of price and cost based benchmarks. In addition counterparty exposure, turnover, hit ratios and counterparty performance across a range of different market conditions and positioning were actively assessed. Whilst the availability of external information to benchmark ourselves against was less than was available for certain other asset classes our analysis shows that we achieved consistently competitive outcomes in 2019.

Execution venues

No counterparties were added and one counterparty was removed from Insight's approved counterparty panel in 2019.

Notification if <1 average trade per business day in the previous year: N

Top 5 venues ranked in terms of volume (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 directed orders
NatWest Markets Plc (RR3QWICWWIPCS8A4S074)	24.19%	22.15%	0.00%
Goldman Sachs Group Inc (784F5XWPLTWKTBV3E584)	17.01%	11.70%	0.00%
Barclays Plc (213800LBQA1Y9L22JB70)	11.48%	12.66%	0.00%
HSBC Holdings PLC (MLU0ZO3ML4LN2LL2TL39)	10.88%	9.82%	0.00%
JPMorgan Chase & Co (8I5DZWZKVSZI1NUHU748)	7.93%	6.45%	0.00%

d) Credit derivatives

ii) Other credit derivatives

Relative importance given to the execution factors

For credit default swaps, price or spread and size of trade were our most important execution factors. Client orders were executed with those counterparties which offer the best price taking into account other best execution factors such as liquidity, counterparty restrictions and other implicit costs of trading.

Counterparties were also selected based upon additional factors such as the ISDA and swap agreements in place, which may limit the number of available counterparties, fund manager limits or any client instructions or limits and underlying market conditions.

Quality of execution

Our monitoring was undertaken internally with trades being assessed against a number of price and cost based benchmarks. In addition counterparty exposure, turnover and hit ratios were actively assessed. Our analysis demonstrated that we achieved consistently competitive outcomes for our trading activities in 2019.

Execution venues

No counterparties were added and one counterparty was removed from Insight's approved derivative counterparty panel in 2019. The percentages shown in the RTS28 table below do not add up to 100%, this is because the majority of our trading was undertaken directly with counterparts however a small portion of our total CDS trading was undertaken via Tradeweb the electronic execution venue.

Notification if <1 average trade per business day in the previous year: N

Top 5 venues ranked in terms of volume (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 directed orders
Citigroup Inc (6SHGI4ZSSLCXXQSBB395)	30.39%	22.95%	0.00%
Goldman Sachs Group Inc (784F5XWPLTWKTBV3E584)	16.55%	14.98%	0.00%
JPMorgan Chase & Co (8I5DZWZKVSZI1NUHU748)	13.80%	15.52%	0.00%
Bank of America Corp (9DJT3UXIJIZJI4WXO774)	13.71%	8.95%	0.00%
BNP Paribas SA (R0MUWSFPU8MPRO8K5P83)	10.05%	10.96%	0.00%

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Top 5 venues ranked in terms of volume (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 directed orders
TradeWeb	1.42%	7.38%	0.00%
Bloomberg	0.00%	0.05%	0.00%

e) Currency derivatives

i) Futures and options admitted to trading on a trading venue

Relative importance given to the execution factors

Currency futures markets are both transparent and liquid. When executing these trades, we placed the highest importance on price and then any associated costs of trading. Currency futures were an infrequently traded asset class for Insight and represented less than 0.25% of Insight's total foreign exchange activity by volume in 2019.

Quality of execution

We used an independent TCA provider BestX to assess the quality of our currency futures and options executions. Trades were measured against a number of benchmarks and our analysis demonstrated that we achieved consistently competitive outcomes for our trading activities in 2019.

Execution venues

No venues or counterparts were added or removed in 2019.

Notification if <1 average trade per business day in the previous year: N

Top 5 venues ranked in terms of volume (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 directed orders
Goldman Sachs Group Inc (784F5XWPLTWKTBV3E584)	67.58%	66.26%	0.00%
JPMorgan Chase & Co (8I5DZWZKVSZI1NUHU748)	31.87%	32.92%	0.00%
Morgan Stanley (IGJSJL3JD5P30I6NJZ34)	0.55%	0.82%	0.00%

ii) Swaps, forwards, and other currency derivatives

Relative importance given to the execution factors

Currency markets, are in the main, highly liquid making price the most important execution factor. Cost and Market impact were our next highest considerations. Where our orders were above a certain size and seeking a price may not be to the clients' advantage, we used execution algorithms to achieve the best outcome. In this scenario, size of trade, spreads and costs were our most important considerations although the latter are becoming increasingly standard as venues compete for business. Once the decision was made to fragment an order in this way, speed of execution became a factor as we aimed to optimise the time risk taken under this approach so as to minimise the risk of signalling our intentions to the market by trading too quickly and being too high a percentage of market volume.

We used a number of pre-trade execution tools to determine the best parameters and venues for each method of execution and validated this using post-trade analysis tools provided by our independent TCA provider BestX. These tools use our empirical data as well as the anonymised data of a number of our peers to identify which venues have performed best by currency pair, trade size and time of day.

Quality of execution

We used BestX an independent TCA provider to assess our currency trading outcomes. All aspects of execution performance were assessed, including price, costs, speed, likelihood of execution and settlement, size, nature of the order, as well as benchmark performance, market impact, post-trade revaluations, signalling risk, peer performance and

implementation shortfall. This analysis demonstrated that we achieved consistently competitive outcomes for our trading activities in 2019.

Execution venues

We did not add or remove any execution venues or counterparts in 2019. Note the percentages shown in the RTS28 table below do not add up to 100% because not all our order flow was distributed via these platforms, the balance were voice traded.

Notification if <1 average trade per business day in the previous year: N

Top 5 venues ranked in terms of volume (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 directed orders
Citigroup Inc (6SHGI4ZSSLCXXQSBB395)	15.32%	20.03%	0.00%
HSBC Holdings PLC (MLU0ZO3ML4LN2LL2TL39)	14.91%	21.25%	0.00%
JPMorgan Chase & Co (8I5DZWZKVSZI1NUHU748)	9.71%	6.62%	0.00%
Royal Bank of Canada (ES7IP3U3RHIGC71XBU11)	8.06%	8.37%	0.00%
Barclays Plc (213800LBQA1Y9L22JB70)	7.96%	3.11%	0.00%

Execution RTS 28

Top 5 venues ranked in terms of volume (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 directed orders
FXall	81.60%	92.88%	0.00%
Bloomberg	0.00%	0.01%	0.00%

f) Structured finance instruments

Relative importance given to the execution factors

This section covers our ABS and MBS trading. For these instruments, price and liquidity were our primary execution factors. Factors such as size, likelihood of settlement, market positioning and market impact also played a part, particularly so in less liquid instruments as positioning determined on occasions whom could competitively quote to trade the security we wished to trade.

Quality of execution

We used external TCA providers (Bloomberg BTCA up to May 2019 and BestX from May 2019 onwards), to help analyse our ABS and MBS trading outcomes. Additionally we monitored internally our counterparty hit ratios and concentrations. Our analysis shows consistently competitive outcomes in 2019.

Execution venues

We did not add or remove any counterparties in 2019. The percentages shown in the RTS28 report below do not add up to 100% because not all our ABS and MBS trades were executed via an execution platform. Some larger, more difficult or less liquid securities were negotiated and traded directly with counterparties.

Notification if <1 average trade per business day in the previous year: N

Top 5 venues ranked in terms of volume (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 directed orders
Bank of America Corp (9DJT3UXIJZJI4WXO774)	14.57%	7.01%	0.00%
BNP Paribas SA (R0MUWSFPU8MPRO8K5P83)	13.65%	7.60%	0.00%
Citigroup Inc (6SHGI4ZSSLCXXQSBB395)	9.51%	10.67%	0.00%
Barclays Plc (213800LBQA1Y9L22JB70)	7.60%	5.31%	0.00%
Morgan Stanley (IGJSJL3JD5P30I6NJZ34)	7.12%	7.90%	0.00%

Execution RTS 28

Top 5 venues ranked in terms of volume (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 directed orders
Bloomberg	61.71%	81.99%	0.00%
TradeWeb	26.46%	7.01%	0.00%

g) Equity derivatives

i) Options and futures admitted to trading on a trading venue

Relative importance given to the execution factors

For equity options and futures transactions price and size were our most important execution factors. The equity futures contracts that we traded are generally very liquid and that meant that most trades were communicated to a counterparty who then traded in accordance with our instructions on the relevant exchange. For larger orders, speed, likelihood of execution and information leakage become more important and for some larger trades we traded as principal with a single counterparty asking them to quote a risk price.

For equity options, orders were traded on an RFQ (request for quote) basis except where our size risked information leakage in which case we on occasion asked a single counterparty to quote.

Quality of execution

Our Equity futures and options oversight was undertaken by our Equity TCA provider Bloomberg BTCA. Our analysis of the TCA data shows that we achieved consistently competitive outcomes in 2019.

Execution venues:

We did not add or remove any counterparties in 2019. The percentages shown in the RTS28 report below do not add up to 100% because the majority of our trades were not executed via an RFQ execution platform.

Notification if <1 average trade per business day in the previous year: N

Top 5 venues ranked in terms of volume (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 directed orders
Goldman Sachs Group Inc (784F5XWPLTWKTBV3E584)	29.58%	25.94%	0.00%
JPMorgan Chase & Co (8I5DZWZKVSZI1NUHU748)	18.55%	15.39%	0.00%
Bank of America Corp (9DJT3UXIJZJI4WXO774)	11.59%	19.36%	0.00%
Morgan Stanley (IGJSJL3JD5P30I6NJZ34)	9.47%	6.73%	0.00%
Barclays Plc (213800LBQA1Y9L22JB70)	8.18%	2.41%	0.00%

Execution RTS 28

Top 5 venues ranked in terms of volume (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 directed orders
TradeWeb	0.71%	2.01%	0.00%

ii) Swaps and other equity derivatives

Relative importance given to the execution factors

For equity swap transactions price and size were our most important execution factors. For securities where liquidity is good Insight will direct order flow to counterparties which provide the best price taking into account the size of the order and the ability of the counterparty to execute on a timely basis. For large volume orders, programme trades or illiquid product, execution factors such as speed and likelihood of execution became more important. In addition Fund Manager limits or instructions formed part of our execution strategy decision making process where specific parameters or requirements of a trade may influence our decision to trade high touch for example interacting with a brokers risk price or low touch for example executing via a brokers algorithm.

In addition, counterparties are selected based upon factors such as fund manager limits or instructions and any client instructions or restrictions.

Quality of execution

Pre trade we used a number of tools to help determine positioning and availability of IOI's, this data is used by our traders to help determine their trade presentation strategies. Post trade we used Bloomberg BTCA to analyse our achieved executions which were measured against a number of benchmarks which included arrival price, executed price and expected market impact. Where available, we used trading venues peer comparison data to further benchmark our outcomes. In addition we monitored counterparty turnover, venue performance, counterparty hit ratios and concentrations.

Separate and specific reviews were undertaken of all our trades executed via a broker provided algorithms and each algorithm's outcomes was reviewed against expected outcomes and peer algorithm performance.

Our analysis shows that we achieved consistently competitive outcomes in 2019.

Execution venues:

We added one new equity derivative execution broker in 2019.

Notification if <1 average trade per business day in the previous year: N

Top 5 venues ranked in terms of volume (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 directed orders
Bank of America Corp (9DJT3UXIJZJI4WXO774)	17.54%	12.40%	0.00%
Goldman Sachs Group Inc (784F5XWPLTWKTBV3E584)	14.33%	8.36%	0.00%
JPMorgan Chase & Co (8I5DZWZKVSZI1NUHU748)	13.00%	18.30%	0.00%
HSBC Holdings PLC (MLU0ZO3ML4LN2LL2TL39)	11.34%	0.95%	0.00%
Morgan Stanley (IGJSJL3JD5P30I6NJZ34)	7.67%	15.11%	0.00%

k) Exchange traded products (exchange traded funds, exchange traded notes, and exchange traded commodities)

Relative importance given to the execution factors

This section comprises our ETF (Exchange Traded Funds) trading, for ETF's price and size were the primary best execution factors. The majority of our orders were traded on a RFQ basis via Tradeweb. This means that typically several brokers would be asked to quote for each trade and we traded with the broker showing the most competitive price for our trade. A small proportion of larger trades were executed directly with our counterpart, this was to prevent information leakage, hence the percentages shown below in the RTS28 section do not add up to 100%.

Quality of execution

We monitored our ETF trading using similar methodology and providers as for our Equity trading, with Bloomberg BTCA being used as an external TCA provider. Because an RFQ trading protocol was used for the majority of our ETF trades particular emphasis was placed on counterparty hit ratios and concentrations.

As can be seen from the top five counterparts table below Jane Street captured a dominant share of our total ETF traded volume. This reflected their strength in several of the key ETF's we traded and almost all trades they won were shown in competition via RFQ ensuring we obtained the best available market price from a range of counterparts.

The percentages shown in the RTS28 report below do not add up to 100% because not all our ETF trades were executed via an execution platform. Our analysis shows that we achieved consistently competitive outcomes in 2019.

Execution venues

No ETF counterparts were added or removed in 2019.

Notification if <1 average trade per business day in the previous year: N

Top 5 venues ranked in terms of volume (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 directed orders
Jane Street Group LLC (5493002N1IVX6KHGYO08)	71.84%	37.88%	0.00%
Flow Traders (549300Z7LIC6NFIJL947)	14.59%	18.69%	0.00%
Citigroup Inc (6SHGI4ZSSLCXXQSBB395)	4.34%	7.07%	0.00%
Goldman Sachs Group Inc (784F5XWPLTWKTBV3E584)	2.51%	6.57%	0.00%
Susquehanna Financial Group LLLP (549300UHLZVQ1CWNT812)	2.38%	0.51%	0.00%

Execution RTS 28

Top 5 venues ranked in terms of volume (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 directed orders
TradeWeb	98.65%	94.44%	0.00%

m) Other instruments

Relative importance given to the execution factors

We have included in this section all our loans trading. Price and counterparty availability were typically the primary execution factors for this asset class but with consideration also given to facility agent where the tranche levels are small which would amplify trading/transfer costs. Consideration was also given to the ability to execute in volatile markets and the ability of the counterparty to maintain their level. Secondary market turnover was lower than in many other asset classes so counterparty turnover numbers can be driven by primary issuance.

Quality of execution

Our monitoring of loan trading was undertaken internally within our second line function. A random sample deep dive approach was taken.

Our analysis showed that we achieved consistently competitive outcomes in 2019.

Execution venues:

As secondary turnover is low our choice of counterparty was often driven by primary flow and whom the issuing lead manager was. Similarly for secondary market trading Loans often had a limited number of counterparties able and willing to trade and we therefore often had little choice over counterparty. We added seventeen loan counterparties in 2019, almost all of these were loans specialist subsidiaries of existing counterparties.

Notification if <1 average trade per business day in the previous year: N

Top 5 venues ranked in terms of volume (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 directed orders
Citigroup Inc (6SHGI4ZSSLCXXQSBB395)	9.59%	3.43%	0.00%
Morgan Stanley (IGJSJL3JD5P30I6NJZ34)	9.45%	6.40%	0.00%
Goldman Sachs Group Inc (784F5XWPLTWKTBV3E584)	8.22%	6.71%	0.00%
Shawbrook Bank Ltd (213800XSHRKUIZK86B68)	8.08%	4.52%	0.00%
Bank of America Corp (9DJT3UXIJIZJI4WXO774)	7.55%	11.70%	0.00%

Securities financing transactions

Relative importance given to the execution factors

For Repo and reverse repo transactions, factors such as client limits, counterparty exposure limits, counterparty restrictions and price were our primary execution factors. Where funds had existing counterparty exposures up to or close to exposure limits this could limit our availability of counterparties and influence the number of competitive quotes obtained. Where possible we asked every eligible counterparty to quote and traded with the best quote received.

Quality of execution

For this asset class the quality of execution is monitored internally. We plotted the rate paid against maturity and challenged any outliers to the curve. In addition counterparty exposures were closely monitored. Our analysis showed that we achieved consistently competitive price outcomes whilst maintaining a sufficient spread of counterparty exposure.

Execution venues:

The Repo market is a constantly evolving market with new products, for example cleared repo, and new counterparties appearing over time. Volumes executed with any specific counterparty can vary substantially; this variance is principally driven by issuers changing funding requirements and pricing competitiveness. We added two new counterparties to Insight's approved Repo counterparty list in 2019.

Notification if <1 average trade per business day in the previous year: N

Top 5 venues ranked in terms of volume (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 directed orders
Royal Bank of Canada (ES7IP3U3RHIGC71XBU11)	19.69%	10.92%	0.00%
Barclays Plc (213800LBQA1Y9L22JB70)	15.50%	9.24%	0.00%
BNP Paribas SA (R0MUWSFPU8MPRO8K5P83)	14.17%	7.29%	0.00%
Banco Santander SA (I4H45493006QMFDDMYWIAM13)	10.84%	4.66%	0.00%
Credit Agricole CIB (1VUV7VQFKUOQSJ21A208)	9.29%	8.08%	0.00%

Appendix I List of financial instruments

Classes of financial instrument	Trading platform	Counterparty
(a) Equities – Shares & Depositary Receipts		
(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)		✓
(iv) Tick size liquidity band Other (No banding)		✓
(b) Debt instruments		
(i) Bonds	✓	✓
(ii) Money markets instruments		✓
(c) Interest rates derivatives		
(i) Futures and options admitted to trading on a trading venue		✓
(ii) Swaps, forwards, and other interest rates derivatives		✓
(d) credit derivatives		
(i) Futures and options admitted to trading on a trading venue		Not traded blank section removed
(ii) Other credit derivatives	✓	✓
(e) currency derivatives		
(i) Futures and options admitted to trading on a trading venue		✓
(ii) Swaps, forwards, and other currency derivatives	✓	✓
(f) Structured finance instruments	✓	✓
(g) Equity Derivatives		
(i) Options and Futures admitted to trading on a trading venue	✓	✓
(ii) Swaps and other equity derivatives		✓
(h) Securitized Derivatives		
(i) Warrants and Certificate Derivatives		Not traded blank section removed
(ii) Other securitized derivatives		Not traded blank section removed
(i) Commodities derivatives and emission allowances Derivatives		
(i) Options and Futures admitted to trading on a trading venue		Not traded blank section removed
(ii) Other commodities derivatives and emission allowances derivatives		Not traded blank section removed
(j) Contracts for difference		Not traded blank section removed
(k) Exchange traded products (Exchange traded funds, exchange traded notes and exchange traded commodities)	✓	✓

Classes of financial instrument	Trading platform	Counterparty
(l) Emission allowances		Not traded blank section removed
(m) Other instruments		Contains loans only
Securities financing transactions	✓	✓

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