

Brown Shipley and Co. Ltd

Annual Best Execution Disclosure
01/01/2017 to 31/12/2017

April 2018

BROWN SHIPLEY



Brown Shipley and Co. Ltd - Annual Best Execution Disclosure 2017

On an annual basis Brown Shipley and Co. Ltd (Brown Shipley) 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 requirements of Regulatory Technical Standard 28 (RTS28) of the MiFID II regulation.

Where clients have a custody agreement with Brown Shipley, the execution of all orders for these clients has been outsourced to an agency broker, currently Brown Shipley's parent company KBL European Private Bankers (KBL), who route these to a panel of executing brokers. In turn, these brokers have access to a range of execution venues within their local market.

Where client assets are held outside of Brown Shipley's custody, Brown Shipley will route orders for non-UK equity, bonds and other debt instruments through the agency broker. Orders for UK equities will be routed directly to an appropriate executing broker and orders for collective investment schemes directly to the fund, the fund's operating company or through a third party.

Best Execution means that Brown Shipley must take all sufficient steps to obtain, when executing orders, the best possible result for all clients considering price, size and nature of order, likelihood of execution and settlement, costs, speed, or any other consideration relevant to the execution of the order.

Brown Shipley has determined that the order of importance of the execution factors is the same across all products and markets; therefore, for all clients the best possible result will be determined in terms of the total consideration, representing the price of the financial instrument and the costs related to execution. The rest of the mentioned factors are also considered in order to provide clients with the best result.

If specific instructions are provided directly from clients that affect Brown Shipley's application of the above execution factors, the instruction will be respected.

A review is carried out annually of all brokers utilised by Brown Shipley. This includes assessments of execution quality, service delivery and the financial standing of the firm. In the case of the agency broker arrangements with Brown Shipley's parent company we additionally carry out, monthly reviews of service provision and an annual due diligence review.

All order executions are reviewed to ensure that a good price was achieved and that our execution policy consistently ensures good prices. These reviews have highlighted no issue with the quality of the executions achieved and no changes to our execution policy have resulted.

Details of how dealing processes vary across asset types can be found within the Brown Shipley Order Execution Policy and additional information can be provided upon request.



Professional Clients

Equities – Shares & Depositary Receipts

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

Top five execution venues ranked in terms of trading volumes (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 passive orders	Percentage of aggressive orders	Percentage of directed orders
KCG Europe	100.00%	100.00%	N/A	N/A	0.00%

Debt Instruments - Bonds

Notification if <1 average trade per business day in previous year Y

Top five execution venues ranked in terms of trading volumes (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 passive orders	Percentage of aggressive orders	Percentage of directed orders
RIA Capital Markets	19.08%	15.03%	N/A	N/A	0.00%
Morgan Stanley	17.16%	13.73%	N/A	N/A	0.00%
UBS	16.89%	17.65%	N/A	N/A	0.00%
Mitsubishi	11.97%	13.07%	N/A	N/A	0.00%
Lloyds	11.34%	11.11%	N/A	N/A	0.00%



Exchange Traded Products (Exchange traded funds, exchange traded notes and exchange traded commodities)

Notification if <1 average trade per business day in previous year Y

Top five execution venues ranked in terms of trading volumes (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 passive orders	Percentage of aggressive orders	Percentage of directed orders
KCG Europe	100.00%	100.00%	N/A	N/A	0.00%

Structured Finance Instruments

Notification if <1 average trade per business day in previous year Y

Top five execution venues ranked in terms of trading volumes (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 passive orders	Percentage of aggressive orders	Percentage of directed orders
KBL European Private Bankers	100.00%	100.00%	N/A	N/A	0.00%



Retail Clients

Equities – Shares and Depositary Receipts

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

Top five execution venues ranked in terms of trading volumes (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 passive orders	Percentage of aggressive orders	Percentage of directed orders
KBL European Private Bankers	99.89%	99.82%	N/A	N/A	0.00%
KCG Europe	0.11%	0.18%	N/A	N/A	0.00%

Debt Instruments - Bonds

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

Top five execution venues ranked in terms of trading volumes (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 passive orders	Percentage of aggressive orders	Percentage of directed orders
KBL European Private Bankers	100.00%	100.00%	N/A	N/A	0.00%



Exchange Traded Products (Exchange traded funds, exchange traded notes and exchange traded commodities)

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

Top five execution venues ranked in terms of trading volumes (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 passive orders	Percentage of aggressive orders	Percentage of directed orders
KBL European Private Bankers	99.86%	99.91%	N/A	N/A	0.00%
KCG Europe	0.14%	0.09%	N/A	N/A	0.00%

Structured Finance Instruments

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

Top five execution venues ranked in terms of trading volumes (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 passive orders	Percentage of aggressive orders	Percentage of directed orders
KBL European Private Bankers	100.00%	100.00%	N/A	N/A	0.00%