



Brunswick Investment Management Ltd (Brunswick) RTS 28 Report for 1st January 2020 to 31st December 2020

This report provides details on the top 5 execution venues used by Brunswick.

EF Brunswick Portfolios

The EF Brunswick Portfolios managed by Brunswick have a separate RTS 28 report, which is also available on Brunswick's website.

Individual Client Portfolios

The majority of deals placed by Brunswick are within a discretionary arrangement from retail clients.

Brunswick has carried out due diligence on the execution venues chosen for deals, which is available on request.

Brunswick monitors the best execution of the deals placed with the venues. Brunswick operates within its best execution policy, which is available on request.

Brunswick placed significant reliance on Transact (Integrated Financial Arrangements) as its primary execution venue in 2020 as justified below.

Transact

Transact is operated by Integrated Financial Arrangements Ltd, which is part of the IntegraFin Holdings plc group of companies. Transact was launched in 2000 and has been profitable every year since 2003. Transact is multi award winning and one of the leading platform/wrap services in the UK market, with £44.82 billion of assets held on the platform (@ 31st December 2020). Due diligence and Order Execution documents are available on its website – transact-online.co.uk. Transact itself is not an execution venue and places deals through other execution venues of its choice. Transact publishes its own RTS28 report, which is available on <https://www.transact-online.co.uk/important-information> under a document titled Order Execution Quality Report.

Transaction Data – Top 5 execution venues ranked in terms of trading volumes

The content of this report and format of the tables set out below is as prescribed by the European Commission.

The percentages shown apply to the top 5 execution venues only. Whilst other execution venues were used the percentages of deals over the year were minor in comparison to the top 5.

Investment Company trades are defined as Equities for the purpose of this report. Collective investments such as OEICs and Unit Trusts are defined as Other Investments for the purpose of this report. Any other classes of instrument not shown in this report means that no trades were placed in these classes.

Class of Instrument	Equities				
Notification if less than 1 average trade per business day in the previous year	Yes				
Top 5 execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a % of total in that class	Proportion of orders executed as % of total in that class	% of Passive Orders	% of Aggressive Orders	% of Directed Orders
Transact (Integrated Financial Arrangements Ltd) (LEI 213800ZSEM CXQTV1047)	100	100	0	0	100
Prudential Assurance Company Ltd (LEI 8IUGZ4RSNMJG05397M84)	0	0	0	0	0
Meteor Asset Management Ltd (LEI 2138008UN4KBVG2LGA27)	0	0	0	0	0
Walker Crips Investment Management Ltd (LEI 213800DAFKGCXA75BD06)	0	0	0	0	0
Way Fund Managers Ltd (LEI 549300TVSF2J4D5SGZ55)	0	0	0	0	0

Class of Instrument	Structured Finance Instruments				
Notification if less than 1 average trade per business day in the previous year	Yes				
Top 5 execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a % of total in that class	Proportion of orders executed as % of total in that class	% of Passive Orders	% of Aggressive Orders	% of Directed Orders
Transact (Integrated Financial Arrangements Ltd) (LEI 213800ZSEMCXQOTV1047)	84	84	0	0	100
Prudential Assurance Company Ltd (LEI 8IUGZ4RSNMJG05397M84)	0	0	0	0	0
Meteor Asset Management Ltd (LEI 2138008UN4KBVG2LGA27)	11	11	0	0	100
Walker Crips Investment Management Ltd (LEI 213800DAFKGCSA75BD06)	5	5	0	0	100
Way Fund Managers Ltd (LEI 549300TVSF2J4D5SGZ55)	0	0	0	0	0

Class of Instrument	Exchange Traded Products				
Notification if less than 1 average trade per business day in the previous year	Yes				
Top 5 execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a % of total in that class	Proportion of orders executed as % of total in that class	% of Passive Orders	% of Aggressive Orders	% of Directed Orders
Transact (Integrated Financial Arrangements Ltd) (LEI 213800ZSEM CXQTV1047)	100	100	0	0	100
Prudential Assurance Company Ltd (LEI 8IUGZ4RSNMJG05397M84)	0	0	0	0	0
Meteor Asset Management Ltd (LEI 2138008UN4KBVG2LGA27)	0	0	0	0	0
Walker Crips Investment Management Ltd (LEI 213800DAFKGCXA75BD06)	0	0	0	0	0
Way Fund Managers Ltd (LEI 549300TVSF2J4D5SGZ55)	0	0	0	0	0

Class of Instrument	Other Instruments				
Notification if less than 1 average trade per business day in the previous year	No				
Top 5 execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a % of total in that class	Proportion of orders executed as % of total in that class	% of Passive Orders	% of Aggressive Orders	% of Directed Orders
Transact (Integrated Financial Arrangements Ltd) (LEI 213800ZSEM CXQOTV1047)	99	99	0	0	100
Prudential Assurance Company Ltd (LEI 8IUGZ4RSNMJG05397M84)	<1	<1	0	0	100
Meteor Asset Management Ltd (LEI 2138008UN4KBVG2LGA27)	0	0	0	0	
Walker Crips Investment Management Ltd (LEI 213800DAFKGCXA75BD06)	0	0	0	0	0
Way Fund Managers Ltd (LEI 549300TVSF2J4D5SGZ55)	<1	<1	0	0	100