

RTS 28 ANNUAL REPORT 2018

Annual publication by Shard Capital Partners LLP ("Shard Capital") of information on the identity of execution venues and/ or counterparties and on the quality of execution. This report pertains to Rubrics Asset Management Limited ("Rubrics"), an appointed representative of Shard Capital Partners LLP.

The report consists of a qualitative assessment and a quantitative assessment.

QUALITATIVE ASSESSMENT

This assessment contains a summary of the analysis and conclusions Shard Capital draw from their detailed monitoring of the quality of execution and includes:

- 1. 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.**

The relative importance of each of these factors within Rubrics' dealing procedures will vary depending upon a number of criteria, namely:

- a. The investment intention of the Portfolio Manager that initiated the order;
- b. The characteristics of financial instruments that are the subject of that order; and
- c. The characteristics of the execution venues to which that order can be directed.

Each client order that is transacted by our traders is essentially unique in its characteristics and market conditions are always changing which impacts on the relative importance of the execution factors at any one time. During regular market conditions, factors that we deem the most important are the price of the instrument and costs of execution and size. Trades are routed to counterparties that are able to provide best price in bonds that are of interest to Rubrics. Counterparties unable to achieve an attractive price in relation to indicated bid/offer spreads will not be selected. For large orders or illiquid instruments, likelihood of execution can take priority. Rubrics engages with reputable, regulated counterparties in the fixed income space, and reviews these relationships on a periodic basis, whilst also closely monitoring any failing trades with the counterparties.

- 2. A description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders.**

Rubrics does not have any close links, conflicts of interest or common ownerships with respect to any execution venues used to execute orders.

Shard Capital has an Order Execution Policy and all trades are executed in line with this policy. No monetary/ non-monetary benefits which dictate where orders are executed are received from third parties. Rubrics pays for investment research from certain counterparties, however this does not influence the choice of executing broker.

Shard Capital further maintain a Conflicts of Interest Policy and a Gifts and Entertainment Policy and all business is conducted in line with these policies.

- 3. A description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received.**

None.

- 4. 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.**

There were no major changes in the list of execution venues listed in the firm's execution policy.

- 5. 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.**

Execution does not differ according client categorisation. All trades are executed for Rubrics UCITS Funds which are classified as professional clients.

- 6. 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.**

Orders are not executed directly for retail clients.

- 7. An explanation of how the investment firm has used any data or tools relating to the quality of execution, including any data published under RTS 27.**

Quality of execution is reviewed as part of the Best Execution Framework where sample testing is carried out monthly basis.

- 8. Where applicable, an explanation of how the investment firm has used output of a consolidated tape provider.**

Not applicable.

Important Information

This document has been prepared for the purposes of complying with the Regulatory Technical Standard ("RTS") 28 which require Shard Capital to make information relating to selection of execution venues and counterparties available to the public.

Shard Capital Partners LLP is authorised and regulated by the Financial Conduct Authority (FRN: 538762). Rubrics Asset Management Limited (FRN: 694948) is an appointed representative of Shard Capital Partners LLP.

Rubrics Asset Management Limited
Venue Report 2018

Client type	Interaction	Class of Instrument	Period start	Period end	Notification if <1 average trade per business day in the previous year	
Professional	Execution	Unclassified	01/01/2018	31/12/2018	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	
Off Exchange Transactions\XOFF	100	100	0	100	0	
Professional	Execution	Debt instruments: Bonds	01/01/2018	31/12/2018	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	
Off Exchange Transactions\XOFF	100	100	18.56	81.44	0	
Professional	Execution	Debt instruments: Money markets instruments	01/01/2018	31/12/2018	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	
Off Exchange Transactions\XOFF	100	100	16.33	83.67	0	
Professional	Execution	Equities - Shares & Depository Receipts (T12)	01/01/2018	31/12/2018	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	
Off Exchange Transactions\XOFF	100	100	100	0	0	
Professional	Execution	Exchange traded products (Exchange traded funds, exchange traded notes and exchange traded commodities)	01/01/2018	31/12/2018	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	
Off Exchange Transactions\XOFF	100	100	100	0	0	
Professional	Execution	Other instruments	01/01/2018	31/12/2018	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	
Off Exchange Transactions\XOFF	100	100	44	56	0	

Rubrics Asset Management Limited
Broker Report 2018

Client type	Interaction	Class of Instrument	Period start	Period end	Notification if <1 average trade per business day in the previous year
Professional	Placement/transmission	Unclassified (Currency derivatives)	01/01/2018	31/12/2018	Y
Top five investment firms 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
THE BANK OF NEW YORK MELLON (INTERNATIONAL) LIMITED - 549300KP66LL8NKKFL47	100	100	0	100	0
Client type	Interaction	Class of Instrument	Period start	Period end	Notification if <1 average trade per business day in the previous year
Professional	Placement/transmission	Debt Instruments, Bonds	01/01/2018	31/12/2018	N
Top five investment firms 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
DINOSAUR MERCHANT BANK LIMITED - 213800WDBCP28M4C9E37	53.33	3.4	100	0	0
COWEN INTERNATIONAL LIMITED - 213800S7FGLGM4J4MV84	19.1	0.65	100	0	0
TD Securities Limited - H71H6FPHX49CGFTF4J23	7.92	13.86	0	100	0
Citadel Securities Institutional LLC - 549300ML01537151UK04	3.32	3.53	0	100	0
UBS Europe SE - 5299007QVIO71064NX37	3.19	12.81	0	100	0
Client type	Interaction	Class of Instrument	Period start	Period end	Notification if <1 average trade per business day in the previous year
Professional	Placement/transmission	Debt instruments, Money markets instruments	01/01/2018	31/12/2018	Y
Top five investment firms 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
BNY MELLON CAPITAL MARKETS EMEA LIMITED - 213800O5FBGOWU89LN14	34.09	3.06	0	100	0
CREDIT SUISSE SECURITIES (EUROPE) LIMITED - DL6FFRRLF74501HE2M14	11.77	8.17	0	100	0
UBS Europe SE - 5299007QVIO71064NX37	11.05	14.29	0	100	0
TD Securities Limited - H71H6FPHX49CGFTF4J23	7.98	11.23	0	100	0
NATWEST MARKETS PLC - RR3QWICW/WIPCS8A4S074	5.08	1.02	0 and exchange traded commodities	0	0
Client type	Interaction	Class of Instrument	Period start	Period end	Notification if <1 average trade per business day in the previous year
Professional	Placement/transmission	Equities - Shares & Depository Receipts (T12)	01/01/2018	31/12/2018	Y
Top five investment firms 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
STIFEL NICOLAUS EUROPE LIMITED - 213800BVEFNZ8UYPKL03	100	100	100	0	0
Client type	Interaction	Class of Instrument	Period start	Period end	Notification if <1 average trade per business day in the previous year
Professional	Placement/transmission	Exchange traded products (Exchange traded funds, exchange traded notes)	01/01/2018	31/12/2018	Y
Top five investment firms 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
DINOSAUR MERCHANT BANK LIMITED - 213800WDBCP28M4C9E37	100	100	100	0	0
Client type	Interaction	Class of Instrument	Period start	Period end	Notification if <1 average trade per business day in the previous year
Professional	Placement/transmission	Other instruments (Bonds)	01/01/2018	31/12/2018	Y
Top five investment firms 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
OPPENHEIMER EUROPE LTD - 213800CH6IZ9Jg8PI59	91.06	36	100	0	0
Millennium Advisors LLC - 254900E1P6Z2XZYS163	4.25	8	0	100	0
Renaissance Securities (Cyprus) Limited - IK9CLH4U15AXJV22968	2.39	32	0	100	0
UniCredit Bank AG - 22CNRRBUK830BTEK4170	0.81	4	0	100	0
THE SEAPORT GROUP EUROPE LLP - 2138003MLD2U3GEMHS70	0.7	4	100	0	0

Explanatory Notes

Classification of terms

- Interaction: Includes both orders executed directly by the firm and those where the firm placed an order with another broker to execute the trade.
- Aggressive order: an order that is entered into the order book and took liquidity on the order book.
- Passive order is defined as an order that is submitted to a venue which runs an order book and provided liquidity on the order book. For orders executed via venues/liquidity providers/market makers not running an order book the passive/aggressive classification is not relevant.
- Directed order: an order where a specified execution venue was specified by the client prior to execution of the order.