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## **Brunswick Investment Management Ltd (BIM) RTS 28 Report For 1 January 2018 to 31<sup>st</sup> December 2018**

This annual report provides detail on the top 5 execution venues used by BIM.

### FP Brunswick Portfolios

The FP Brunswick Portfolios managed by BIM have their own separate RTS 28 report.

### Individual Client Portfolios

All investment dealing for the individual client portfolios managed by BIM in 2018 was placed through the following 3 venues:

1. Transact
2. LCL International Life Assurance Company Limited
3. La Mondiale

BIM does not deal directly on instructions from retail clients. All deals placed by BIM are within a discretionary mandate of instructions for each individual retail client, which has been provided by the adviser firm. BIM treats the adviser firm as its professional client and it is the adviser firm that has chosen the three venues that BIM places deals with. It is the adviser firm's responsibility to ensure due diligence of the venues have been carried out. BIM monitors the best execution of the deals placed with the venues. BIM operates in accordance with our best execution policy. Please ask, if you want to see a copy of our policy.

### Transact

Transact is one of the leading platform/wrap services, launched in 2000, with £33 billion of assets currently held on the platform (as at 30<sup>th</sup> September 2018). Due Diligence and Order Execution documents are available on its website - [transact-online.co.uk](http://transact-online.co.uk). Transact itself is not an execution venue and places deals through other execution venues of its choice. Transact will publish its own RTS 28 report.

### LCL International Life Assurance Company Limited (LCLI)

BIM manage investments for two offshore bonds held by LCL International Life Assurance Company Limited in the Isle of Man. The bonds were previously held by Zurich Life International, which was transferred into LCLI on 28<sup>th</sup> December 2017. LCLI is part of the Charles Taylor plc group of companies, which has been well established in international markets around the globe for many years. As the firm is based in the Isle of Man it is not subject to MIFID II requirements, however BIM ensure that any trades placed are dealt with in accordance with BIM's best execution policy. During 2018 the only investments traded on this venue were OEICS/Unit Trusts.

## La Mondiale

BIM manage investments for one offshore bond held by La Mondiale in Luxembourg. La Mondiale is part of the AG2R La Mondiale Group, one of the leaders of insurance in France. It has been established in Luxembourg for over 30 years, is the first European investment fund centre in terms of assets under management plus has an AAA rating from Standard & Poors, Moodys and Fitch. BIM ensure that any trades placed are dealt with in accordance with BIM's best execution policy. During 2018 the only investments traded on this venue were OEICS/Unit Trusts.

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

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) (LEI 213800ZSEM CXQOTV1O47)	100	100	0	0	100
La Mondiale (LEI 549300GYNE6WFGLPB20)	0	0	0	0	0
LCLI (LEI 213800LA9Q87W21D3Z53)	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) (LEI 213800ZSEMCXQOTV1O47)	100	100	0	0	100
La Mondiale (LEI 549300GYNE6WFGLPB20)	0	0	0	0	0
LCLI (LEI 213800LA9Q87W21D3Z53)	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) (LEI 213800ZSEMCXQOTV1O47)	100	100	0	0	100
La Mondiale (LEI 549300GYNE6WFGLPB20)	0	0	0	0	0
LCLI (LEI 213800LA9Q87W21D3Z53)	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) (LEI 213800ZSEMCXQOTV1O47)	> 99.8	> 99.8	0	0	> 99.8
La Mondiale (LEI 549300GYNE6WFGLPB20)	< 0.05	< 0.05	0	0	< 0.05
LCLI (LEI 213800LA9Q87W21D3Z53)	< 0.15	< 0.15	0	0	< 0.15