

**Platform Securities MiFID II RTS 28 Reporting for 01/01/2019 to 31/12/2019**
**MiFID RTS 28 Report (Retail Client)**

<b>Class of Instrument</b>	Equities - Share & Depository Receipts (Tick size bands 1 and 2)				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	No				
<b>Top five execution venues ranked in terms of trading volumes</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as a percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
Winterflood Securities Limited   8BRUP6V1DX3PIG2R0745	43.21%	42.19%	0.00%	100.00%	0.00%
Investec Bank PLC   84S0VF8TSMH0T6D4K848	14.46%	12.59%	0.00%	100.00%	0.00%
J&E Davy   63540061DPCBNMCGRY	12.31%	13.05%	0.00%	100.00%	0.00%
Canacord Genuity Limited   ZBU7V5NIMN4ILRFC23	5.34%	3.03%	0.00%	100.00%	0.00%
Peel Hunt LLP   5493007DWN0R4YB4C84	4.78%	4.89%	0.00%	100.00%	0.00%
<b>Interaction</b>	Execution				

<b>Class of Instrument</b>	Equities - Share & Depository Receipts (Tick size bands 1 and 2)				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	No				
<b>Top five execution venues ranked in terms of trading volumes</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as a percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
UBS Switzerland AG   549300WOIFUSNYH0FL22	98.61%	98.48%	8.55%	34.08%	0.00%
FIS Brokerage & Securities Services LLC   5493000KY00CHOUH1K62	1.39%	1.52%	0.00%	67.65%	0.00%
<b>Interaction</b>	Placed / Transmitted				

**Platform Securities MiFID II RTS 28 Reporting for 01/01/2019 to 31/12/2019**
**MiFID RTS 28 Report (Professional Client)**

<b>Class of Instrument</b>	Equities - Share & Depository Receipts (Tick size bands 1 and 2)				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	No				
<b>Top five execution venues ranked in terms of trading volumes</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as a percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
Winterflood Securities Limited   8BRUP6V1DX3PIG2R0745	26.29%	32.13%	0.00%	100.00%	0.00%
Peel Hunt LLP   5493007DWN0R4YB4C84	23.03%	25.08%	0.00%	100.00%	0.00%
Investec Bank PLC   84S0VF8TSMH0T6D4K848	8.87%	4.95%	0.00%	100.00%	0.00%
Numis Securities Limited   213800P3F4RT97WDSX47	8.85%	6.36%	0.00%	100.00%	0.00%
Cenkos Securities PLC   21800ALVRC52VN31821	8.53%	5.50%	0.00%	100.00%	0.00%
<b>Interaction</b>	Execution				

<b>Class of Instrument</b>	Equities - Share & Depository Receipts (Tick size bands 1 and 2)				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	Yes				
<b>Top five execution venues ranked in terms of trading volumes</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as a percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
UBS Switzerland AG   549300WOIFUSNYH0FL22	99.00%	98.59%	31.36%	50.30%	0.00%
FIS Brokerage & Securities Services LLC   5493000KY00CHOUH1K62	1.00%	1.41%	0.00%	100.00%	0.00%
<b>Interaction</b>	Placed / Transmitted				

### **Equities - Shares & Depositary Receipts**

#### **Tick size bands 1 and 2 (from 0 to 79 trades per day)**

Due to the high availability of liquidity across a number of different venues and the availability of in-depth price discovery, we place the highest importance on price and then costs associated with execution. As we move into less liquid stocks then speed and likelihood of execution increase in priority but would be very unlikely to replace price or cost as the most important factors.

- the price of the financial instrument;
- the costs related to execution;
- the speed of execution;
- the likelihood of execution and settlement;
- the size of the order and associated liquidity in the market for the instrument;
- the credit worthiness and performance of the institution with whom we ultimately place your order;
- the nature of the order; and
- any other consideration relevant to the execution of an order.

As shown in the attached breakdown the majority of our order flow is executed with the RSP (Retail Service providers) network and the larger size orders are executed with other counterparties that specialise in these types of orders to ensure we meet our execution requirements.

Our Order Execution Policy does not treat categories of clients differently and all execution decisions are made by a central desk who execute according to the Policy.

There are no specific arrangements concerning rebates or non-monetary benefits with any current execution venues.

We transmit the majority of our International orders to UBS and FIS Brokerage as it is our experience, when measuring execution quality, they will enable us to obtain at least as good results as may reasonably be expected from using alternative entities for execution. Clients should be aware that UBS are our global custodian and while this simplifies and aids the settlement process it does not exclude them from the other execution factors assessed under the Best Execution requirements. FIS Brokerage is owned by our ultimate parent company, this relationship operates on an identical basis as other market counterparties and does not exclude them from execution factors assessed under the Best Execution requirements.

As part of our standard monitoring, we analyse the performance of our counterparties against the differing products and assess whether we should continue to use them for that product or if there are venues or counterparties that we should add that will enhance our dealing process. If a material change occurs, we will notify our clients of that change and how it will impact our ability to meet the best execution requirements.

### **Tick Size Bands**

In order to provide precise and comparable information, it is necessary to set out classes of financial instruments based on their characteristics relevant for publication purposes.

A class of financial instruments should be narrow enough to reveal differences in order execution behaviour between classes but at the same time broad enough to ensure that the reporting obligations on investment firms is proportionate.

Given the breadth of the equity class of financial instruments, it is appropriate to divide this class into subclasses based on liquidity. As liquidity is an essential factor governing execution behaviours and as execution venues are often competing to attract flows of the most frequently traded stocks, it is appropriate that equity instruments are classified according to their liquidity as determined under the 'tick size' regime as set in Directive 2014/65/EU of the European Parliament and the Council:

Tick size bands 1 and 2 (from 0 to 79 trades per day)

Tick size bands 3 and 4 (from 80 to 1999 trades per day)

Tick size bands 5 and 6 (from 2000 trades per day)

**Platform Securities MiFID II RTS 28 Reporting for 01/01/2019 to 31/12/2019**
**MiFID RTS 28 Report (Retail Client)**

<b>Class of Instrument</b>	Equities - Share & Depository Receipts (Tick size bands 3 and 4)				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	No				
<b>Top five execution venues ranked in terms of trading volumes</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as a percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
Investec Bank PLC   84S0VF8TSMH0T6D4K848	35.20%	20.63%	0.00%	100.00%	0.00%
J&E Davy   63540061DPCBNMCGRY	27.96%	30.33%	0.00%	100.00%	0.00%
Winterflood Securities Limited   8BRUP6V1DX3PIG2R0745	23.50%	35.74%	0.00%	100.00%	0.00%
Peel Hunt LLP   5493007DWN0R4YB4C84	3.11%	2.82%	0.00%	100.00%	0.00%
Numis Securities Limited   213800P3F4RT97WDSX47	2.94%	1.24%	0.00%	100.00%	0.00%
<b>Interaction</b>	Execution				

<b>Class of Instrument</b>	Equities - Share & Depository Receipts (Tick size bands 3 and 4)				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	No				
<b>Top five execution venues ranked in terms of trading volumes</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as a percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
UBS Switzerland AG   549300WOIFUSNYH0FL22	82.38%	83.83%	5.76%	82.37%	0.00%
FIS Brokerage & Securities Services LLC   5493000KY00CHOUH1K62	17.62%	16.17%	3.02%	82.97%	0.00%
<b>Interaction</b>	Placed / Transmitted				

**Platform Securities MiFID II RTS 28 Reporting for 01/01/2019 to 31/12/2019**
**MiFID RTS 28 Report (Professional Client)**

<b>Class of Instrument</b>	Equities - Share & Depository Receipts (Tick size bands 3 and 4)				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	No				
<b>Top five execution venues ranked in terms of trading volumes</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as a percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
Peel Hunt LLP   5493007DWN0R4YB4C84	32.62%	30.43%	0.00%	100.00%	0.00%
Winterflood Securities Limited   8BRUP6V1DX3PIG2R0745	21.83%	32.45%	0.00%	100.00%	0.00%
Cenkos Securities PLC   21800ALVRC52VN31821	10.21%	6.36%	0.00%	100.00%	0.00%
Numis Securities Limited   213800P3F4RT97WDSX47	10.03%	7.21%	0.00%	100.00%	0.00%
Investec Bank PLC   84S0VF8TSMH0T6D4K848	5.97%	5.03%	0.00%	100.00%	0.00%
<b>Interaction</b>	Execution				

<b>Class of Instrument</b>	Equities - Share & Depository Receipts (Tick size bands 3 and 4)				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	Yes				
<b>Top five execution venues ranked in terms of trading volumes</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as a percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
UBS Switzerland AG   549300WOIFUSNYH0FL22	75.22%	91.25%	38.46%	31.87%	0.00%
FIS Brokerage & Securities Services LLC   5493000KY00CHOUH1K62	24.78%	8.75%	0.00%	72.73%	0.00%
<b>Interaction</b>	Placed / Transmitted				

**Equities - Shares & Depositary Receipts****Tick size bands 3 and 4 (from 80 to 1999 trades per day)**

Due to the high availability of liquidity across a number of different venues and the availability of in-depth price discovery, we place the highest importance on price and then costs associated with execution. As we move into less liquid stocks then speed and likelihood of execution increase in priority but would be very unlikely to replace price or cost as the most important factors.

- the price of the financial instrument;
- the costs related to execution;
- the speed of execution;
- the likelihood of execution and settlement;
- the size of the order and associated liquidity in the market for the instrument;
- the credit worthiness and performance of the institution with whom we ultimately place your order;
- the nature of the order; and
- any other consideration relevant to the execution of an order.

As shown in the attached breakdown the majority of our order flow is executed with the RSP (Retail Service providers) network and the larger size orders are executed with other counterparties that specialise in these types of orders to ensure we meet our execution requirements.

Our Order Execution Policy does not treat different categories of clients differently and all execution decisions are made by a central desk who execute according to the Policy. There are no specific arrangements concerning rebates or non-monetary benefits with any current execution venues.

We transmit the majority of our overseas orders to UBS and FIS Brokerage as it is our experience, when measuring execution quality, they will enable us to obtain at least as good results as may reasonably be expected from using alternative entities for execution. Clients should be aware that UBS are our global custodian and while this simplifies and aids the settlement process it does not exclude them from the other execution factors assessed under the Best Execution requirements. FIS Brokerage is owned by our ultimate parent company, this relationship operates on an identical basis as other market counterparties and does not exclude them from execution factors assessed under the Best Execution requirements.

As part of our standard monitoring, we analyse the performance of our counterparties against the differing products and assess whether we should continue to use them for that product or if there are venues or counterparties that we should add that will enhance our dealing process. If a material change occurs, we will notify our clients of that change and how it will impact our ability to meet the best execution requirements.

**Tick Size Bands**

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Tick size bands 1 and 2 (from 0 to 79 trades per day)

Tick size bands 3 and 4 (from 80 to 1999 trades per day)

Tick size bands 5 and 6 (from 2000 trades per day)

**Platform Securities MiFID II RTS 28 Reporting for 01/01/2019 to 31/12/2019**
**MiFID RTS 28 Report (Retail Client)**

<b>Class of Instrument</b>	Equities - Share & Depository Receipts (Tick size bands 5 and 6)				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	No				
<b>Top five execution venues ranked in terms of trading volumes</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as a percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
Investec Bank PLC   84S0VF8TSMH0T6D4K848	62.55%	34.71%	0.00%	100.00%	0.00%
Winterflood Securities Limited   8BRUP6V1DX3PIG2R0745	24.16%	46.76%	0.00%	100.00%	0.00%
J&E Davy   63540061DPCBNMCGRY	7.55%	6.76%	0.00%	100.00%	0.00%
Peel Hunt LLP   5493007DWN0R4YB4C84	1.48%	2.55%	0.00%	100.00%	0.00%
Stifel Nicolaus Europe Limited   213800BVEFNZ8UYPKL03	0.92%	2.94%	0.00%	100.00%	0.00%
<b>Interaction</b>	Execution				

<b>Class of Instrument</b>	Equities - Share & Depository Receipts (Tick size bands 5 and 6)				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	No				
<b>Top five execution venues ranked in terms of trading volumes</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as a percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
UBS Switzerland AG   549300WOIFUSNYH0FL22	58.85%	55.48%	6.49%	84.07%	0.00%
FIS Brokerage & Securities Services LLC   5493000KY00CHOUH1K62	41.15%	44.52%	3.51%	75.66%	0.00%
<b>Interaction</b>	Placed / Transmitted				

**Platform Securities MiFID II RTS 28 Reporting for 01/01/2019 to 31/12/2019**
**MiFID RTS 28 Report (Professional Client)**

<b>Class of Instrument</b>	Equities - Share & Depository Receipts (Tick size bands 5 and 6)				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	No				
<b>Top five execution venues ranked in terms of trading volumes</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as a percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
Winterflood Securities Limited   8BRUP6V1DX3PIG2R0745	32.37%	42.99%	0.00%	100.00%	0.00%
Peel Hunt LLP   5493007DWN0R4YB4C84	31.47%	22.41%	0.00%	100.00%	0.00%
Investec Bank PLC   84S0VF8TSMH0T6D4K848	7.54%	6.92%	0.00%	100.00%	0.00%
Virtu Financial Ireland Limited   549300XG5LFGN1IGC71	7.29%	3.04%	0.00%	100.00%	0.00%
Shore Capital Stockbrokers Limited   2138009KZO3MK7V6372	6.65%	6.67%	0.00%	100.00%	0.00%
<b>Interaction</b>	Execution				

<b>Class of Instrument</b>	Equities - Share & Depository Receipts (Tick size bands 5 and 6)				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	Yes				
<b>Top five execution venues ranked in terms of trading volumes</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as a percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
UBS Switzerland AG   549300WOIFUSNYH0FL22	76.90%	89.32%	28.05%	50.83%	0.00%
FIS Brokerage & Securities Services LLC   5493000KY00CHOUH1K62	23.10%	10.68%	4.17%	62.50%	0.00%
<b>Interaction</b>	Placed / Transmitted				

**Equities - Shares & Depositary Receipts****Tick size bands 5 and 6 (from 2000 trades per day)**

Due to the high availability of liquidity across a number of different venues and the availability of in-depth price discovery, we place the highest importance on price and then costs associated with execution. As we move into less liquid stocks then speed and likelihood of execution increase in priority but would be very unlikely to replace price or cost as the most important factors.

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- the speed of execution;
- the likelihood of execution and settlement;
- the size of the order and associated liquidity in the market for the instrument;
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**Tick Size Bands**

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Tick size bands 1 and 2 (from 0 to 79 trades per day)

Tick size bands 3 and 4 (from 80 to 1999 trades per day)

Tick size bands 5 and 6 (from 2000 trades per day)

**Platform Securities MiFID II RTS 28 Reporting for 01/01/2019 to 31/12/2019**
**MiFID RTS 28 Report (Retail Client)**

<b>Class of Instrument</b>	<b>Debt Instruments, Bonds</b>				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	No				
<b>Top five execution venues ranked in terms of trading volumes</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as a percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
RIA Capital Markets Limited   213800ZO2PQP43WCZ92	33.25%	31.87%	0.00%	100.00%	0.00%
Bridport & Cie SA   213800VGFKO4K5IJUI2	24.37%	24.26%	0.00%	100.00%	0.00%
Winterflood Securities Limited   8BRUP6V1DX3PIG2R0745	24.34%	18.63%	0.00%	100.00%	0.00%
Canacord Genuity Limited   ZBU7V5NIMN4ILRFC23	9.35%	7.61%	0.00%	100.00%	0.00%
Peel Hunt LLP   5493007DWN0R4YB4C84	5.85%	8.27%	0.00%	100.00%	0.00%
<b>Interaction</b>	Execution				

<b>Class of Instrument</b>	<b>Debt Instruments, Bonds</b>				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	Yes				
<b>Top five execution venues ranked in terms of trading volumes</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as a percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
UBS Switzerland AG 549300WOIFUSNYH0FL 22	100.00%	100.00%	40.00%	0.00%	0.00%
<b>Interaction</b>	Placed / Transmitted				

**Platform Securities MiFID II RTS 28 Reporting for 01/01/2019 to 31/12/2019**
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<b>Class of Instrument</b>	<b>Debt Instruments, Bonds</b>				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	No				
<b>Top five execution venues ranked in terms of trading volumes</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as a percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
Winterflood Securities Limited   8BRUP6V1DX3PIG2R0745	53.78%	63.72%	0.00%	100.00%	0.00%
Virtu Financial Ireland Limited  54930 0XG5LFGN1IGYC71	27.96%	24.88%	0.00%	100.00%	0.00%
Peel Hunt LLP   5493007DWN0R4YB4C84	15.28%	9.30%	0.00%	100.00%	0.00%
Bridport & Cie SA   213800VGFKO4K5IJUI2	2.84%	0.82%	0.00%	100.00%	0.00%
Investec Bank PLC   84S0VF8TSMH0T6D4K848	0.12%	0.64%	0.00%	100.00%	0.00%
<b>Interaction</b>	Execution				

<b>Class of Instrument</b>	<b>Debt Instruments, Bonds</b>				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	Yes				
<b>Top five execution venues ranked in terms of trading volumes</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as a percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
<b>Interaction</b>	Placed / Transmitted				

**Debt Instruments, Bonds/ Fixed Income / Government Securities**

Fixed income and Government securities have differing criteria to equities and are executed using different counterparties and strategies depending on the asset class involved.

These securities can be executed in several differing ways depending on the instrument itself, the size of the order and the liquidity available at the time. For more liquid fixed income instruments (e.g. UK Gilts and UK retail bonds listed on the London Stock Exchange Order Book for Retail Bonds) orders will be routed to the RSP Network for onward execution.

For less liquid fixed income instruments our dealers have the option to place the order to one of our approved counterparties for execution with a view to providing the best possible outcome for our client.

There are no specific arrangements concerning rebates or non-monetary benefits with any current execution venues. Our Order Execution Policy does not treat different categories of clients differently and all execution decisions are made by a central desk who execute according to the Policy.

We transmit the majority of our overseas orders to UBS as it is our experience, when measuring execution quality, they will enable us to obtain at least as good results as may reasonably be expected from using alternative entities for execution. Clients should be aware that UBS are our global custodian and while this simplifies and aids the settlement process it does not exclude them from the other execution factors assessed under the Best Execution requirements.

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<b>Class of Instrument</b>	Debt Instruments, Money Market Instruments				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	Yes				
<b>Top five execution venues ranked in terms of trading volumes</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as a percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
Bridport & Cie SA   213800VGFKO4K5IJUI2 0	56.90%	56.25%	0.00%	100.00%	0.00%
Ria Capital Markets Limited   213800OZO 2PQP43WCZ92	37.44%	31.25%	0.00%	100.00%	0.00%
Winterflood Securities Limited   8BRUP6 V1DX3PIG2R0745	5.15%	6.25%	0.00%	100.00%	0.00%
Peel Hunt LLP   5493007DWN0R4YBM4C84	0.51%	6.25%	0.00%	100.00%	0.00%
<b>Interaction</b>	Execution				

<b>Class of Instrument</b>	Debt Instruments, Money Market Instruments				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	No				
<b>Top five execution venues ranked in terms of trading volumes</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as a percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
<b>Interaction</b>	Placed / Transmitted				

**Platform Securities MiFID II RTS 28 Reporting for 01/01/2019 to 31/12/2019**
**MiFID RTS 28 Report (Professional Client)**

<b>Class of Instrument</b>	Debt Instruments, Money Market Instruments				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	Yes				
<b>Top five execution venues ranked in terms of trading volumes</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as a percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
Ria Capital Markets Limited   213800OZO 2PQP43WCZ92	100.00%	100.00%	0.00%	0.00%	0.00%
<b>Interaction</b>	Execution				

<b>Class of Instrument</b>	Debt Instruments, Money Market Instruments				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	No				
<b>Top five execution venues ranked in terms of trading volumes</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as a percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
<b>Interaction</b>	Placed / Transmitted				

**Debt Instruments, Money Market Instruments**

Money Market Instruments have differing criteria to equities and are executed using different counterparties and strategies depending on the asset class involved.

These securities can be executed in several differing ways depending on the instrument itself, the size of the order and the liquidity available at the time. For more liquid fixed income instruments orders will be routed to the RSP Network for onward execution. For less liquid fixed income instruments our dealers have the option to place the order to one of our approved counterparties for execution with a view to providing the best possible outcome for our client.

There are no specific arrangements concerning rebates or non-monetary benefits with any current execution venues. Our Order Execution Policy does not treat different categories of clients differently and all execution decisions are made by a central desk who execute according to the Policy.

As part of our standard monitoring, we analyse the performance of our counterparties against the differing products and assess whether we should continue to use them for that product or if there are venues or counterparties that we should add that will enhance our dealing process. If a material change occurs, we will notify our clients of that change and how it will impact our ability to meet the best execution requirements.

**Platform Securities MiFID II RTS 28 Reporting for 01/01/2019 to 31/12/2019**
**MiFID RTS 28 Report (Retail Client)**

<b>Class of Instrument</b>	Exchange traded products (Exchange traded funds, exchange traded notes and exchange traded commodities)				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	Yes				
<b>Top five execution venues ranked in terms of trading volumes</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as a percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
Winterflood Securities Limited   8BRUP6V1DX3PIG2R0745	75.16%	58.02%	0.00%	100.00%	0.00%
Peel Hunt LLP   5493007DWN0R4YB4C84	10.53%	5.34%	0.00%	100.00%	0.00%
Investec Bank PLC   84S0VF8TSMH0T6D4K848	7.85%	19.08%	0.00%	100.00%	0.00%
Stifel Nicolaus Europe Limited   213800BVEFNZ8UYPKL03	5.90%	14.50%	0.00%	100.00%	0.00%
J&E Davy   63540061DPCBNMCGRY	0.46%	1.53%	0.00%	100.00%	0.00%
<b>Interaction</b>	Execution				

<b>Class of Instrument</b>	Exchange traded products (Exchange traded funds, exchange traded notes and exchange traded commodities)				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	No				
<b>Top five execution venues ranked in terms of trading volumes</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as a percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
UBS Switzerland AG   549300WOIFUSNYH0FL22	94.92%	89.57%	10.29%	60.29%	0.00%
FIS Brokerage & Securities Services LLC   5493000KY00CHOUH1K62	5.08%	10.43%	0.00%	76.00%	0.00%
<b>Interaction</b>	Placed / Transmitted				

**Platform Securities MiFID II RTS 28 Reporting for 01/01/2019 to 31/12/2019**
**MiFID RTS 28 Report (Professional Client)**

<b>Class of Instrument</b>	Exchange traded products (Exchange traded funds, exchange traded notes and exchange traded commodities)				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	No				
<b>Top five execution venues ranked in terms of trading volumes</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as a percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
Peel Hunt LLP   5493007DWN0R4YB4C84	37.90%	19.00%	0.00%	100.00%	0.00%
Winterflood Securities Limited   8BRUP6V1DX3PIG2R0745	33.84%	46.31%	0.00%	100.00%	0.00%
Stifel Nicolaus Europe Limited   213800BVEFNZ8UYPKL03	17.46%	15.60%	0.00%	100.00%	0.00%
Investec Bank PLC   84S0VF8TSMH0T6D4K848	6.37%	13.81%	0.00%	100.00%	0.00%
Virtu Financial Ireland Limited   549300XG5LFGN1IGYC71	4.42%	5.21%	0.00%	100.00%	0.00%
<b>Interaction</b>	Execution				

<b>Class of Instrument</b>	Exchange traded products (Exchange traded funds, exchange traded notes and exchange traded commodities)				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	Yes				
<b>Top five execution venues ranked in terms of trading volumes</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as a percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
UBS Switzerland AG   549300WOIFUSNYH0FL22	57.78%	60.61%	43.64%	34.55%	0.00%
FIS Brokerage & Securities Services LLC   5493000KY00CHOUH1K62	42.22%	39.39%	18.57%	51.43%	0.00%
<b>Interaction</b>	Placed / Transmitted				

### **Exchange Traded Products**

Exchange traded funds, notes and commodities are included in our process for UK equities and will either be executed via the Retail Service Provider (RSP) network or with an approved market counterparty. Due to the high availability of liquidity across a number of different venues and the availability of in-depth price discovery, we place the highest importance on price and then costs associated with execution. As we move into less liquid stocks then speed and likelihood of execution increase in priority but would be very unlikely to replace price or cost as the most important factors.

- the price of the financial instrument;
- the costs related to execution;
- the speed of execution;
- the likelihood of execution and settlement;
- the size of the order and associated liquidity in the market for the instrument;
- the credit worthiness and performance of the institution with whom we ultimately place your order;
- the nature of the order; and
- any other consideration relevant to the execution of an order.

There are no specific arrangements concerning rebates or non-monetary benefits with any current execution venues.

Our Order Execution Policy does not treat different categories of clients differently and all execution decisions are made by a central desk who execute according to the Policy. We transmit the majority of our overseas orders to UBS and FIS Brokerage as it is our experience, when measuring execution quality, they will enable us to obtain at least as good results as may reasonably be expected from using alternative entities for execution.

Clients should be aware that UBS are our global custodian and while this simplifies and aids the settlement process it does not exclude them from the other execution factors assessed under the Best Execution requirements. FIS Brokerage is owned by our ultimate parent company, this relationship operates on an identical basis as other market counterparties and does not exclude them from execution factors assessed under the Best Execution requirement.

As part of our standard monitoring, we analyse the performance of our counterparties against the differing products and assess whether we should continue to use them for that product or if there are venues or counterparties that we should add that will enhance our dealing process. If a material change occurs, we will notify our clients of that change and how it will impact our ability to meet the best execution

**Platform Securities MiFID II RTS 28 Reporting for 01/01/2019 to 31/12/2019**
**MiFID RTS 28 Report (Retail Client)**

<b>Class of Instrument</b>	<b>Structured Finance Instruments</b>				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	No				
<b>Top five execution venues ranked in terms of trading volumes</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as a percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
<b>Interaction</b>	Execution				

<b>Class of Instrument</b>	<b>Structured Finance Instruments</b>				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	Yes				
<b>Top five execution venues ranked in terms of trading volumes</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as a percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
UBS Switzerland AG   549300WOIFUSNYH0FL 22	100.00%	100.00%	18.52%	70.37%	0.00%
<b>Interaction</b>	Placed / Transmitted				

**Platform Securities MiFID II RTS 28 Reporting for 01/01/2019 to 31/12/2019**
**MiFID RTS 28 Report (Professional Client)**

<b>Class of Instrument</b>	<b>Structured Finance Instruments</b>				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	No				
<b>Top five execution venues ranked in terms of trading volumes</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as a percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
<b>Interaction</b>	Execution				

<b>Class of Instrument</b>	<b>Structured Finance Instruments</b>				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	No				
<b>Top five execution venues ranked in terms of trading volumes</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as a percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
UBS Switzerland AG   549300WOIFUSNYH0FL 22	100.00%	100.00%	20.00%	40.00%	0.00%
<b>Interaction</b>	Placed / Transmitted				

### **Structured Finance Instruments (Structured Products)**

In structured finance, a structured product, also known as a market-linked investment, is a pre-packaged investment strategy based on a single security, a basket of securities, options, indices, commodities, debt issuance or foreign currencies, and to a lesser extent, derivatives

Due to the nature of these products Platform Securities would execute on a regulated Exchange or may use a specialist counterparty, we place the highest importance on price and then costs associated with execution. As we move into less liquid stocks then speed and likelihood of execution increase in priority but would be very unlikely to replace price or cost as the most important factors.

- the price of the financial instrument;
- the costs related to execution;
- the speed of execution;
- the likelihood of execution and settlement;
- the size of the order and associated liquidity in the market for the instrument;
- the credit worthiness and performance of the institution with whom we ultimately place your order;
- the nature of the order; and
- any other consideration relevant to the execution of an order.

There are no specific arrangements concerning rebates or non-monetary benefits with any current execution venues. Our Order Execution Policy does not treat different categories of clients differently and all execution decisions are made by a central desk who execute according to the Policy.

We transmit the majority of our overseas orders to UBS as it is our experience, when measuring execution quality, they will enable us to obtain at least as good results as may reasonably be expected from using alternative entities for execution.

Clients should be aware that UBS are our global custodian and while this simplifies and aids the settlement process it does not exclude them from the other execution factors assessed under the Best Execution requirements. As part of our standard monitoring, we analyse the performance of our counterparties against the differing products and assess whether we should continue to use them for that product or if there are venues or counterparties that we should add that will enhance our dealing process. If a material change occurs, we will notify our clients of that change and how it will impact our ability to meet the best execution requirements

**Platform Securities MiFID II RTS 28 Reporting for 01/01/2019 to 31/12/2019**
**MiFID RTS 28 Report (Retail Client)**

<b>Class of Instrument</b>	<b>Other Instruments</b>				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	Yes				
<b>Top five execution venues ranked in terms of trading volumes</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as a percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
Ravenscroft Limited   213800K6VJ62SKV9V L48	77.13%	70.00%	0.00%	100.00%	0.00%
Investec Bank PLC   84S0VF8TSMH0T6D4K84 8	22.36%	10.00%	0.00%	100.00%	0.00%
Canacord Genuity Limited   ZBU7V5NIM N4ILRFC23	0.51%	20.00%	0.00%	100.00%	0.00%
<b>Interaction</b>	Execution				

<b>Class of Instrument</b>	<b>Other Instruments</b>				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	Yes				
<b>Top five execution venues ranked in terms of trading volumes</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as a percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
UBS Switzerland AG 549300WOIFUSNYH0FL 22	100.00%	100.00%	13.33%	42.22%	0.00%
<b>Interaction</b>	Placed / Transmitted				

**Platform Securities MiFID II RTS 28 Reporting for 01/01/2019 to 31/12/2019**
**MiFID RTS 28 Report (Professional Client)**

<b>Class of Instrument</b>	<b>Other Instruments</b>				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	No				
<b>Top five execution venues ranked in terms of trading volumes</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as a percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
Investec Bank PLC   84S0VF8TSMH0T6D4K848	26.93%	39.53%	0.00%	100.00%	0.00%
Winterflood Securities Limited   8BRUP6V1DX3PIG2R0745	26.25%	34.88%	0.00%	100.00%	0.00%
Cenkos Securities PLC   21800ALVRC52VN31821	25.79%	13.95%	0.00%	100.00%	0.00%
J.P. Morgan Securities PLC K6Q0W1PS1L104IQL9C32	11.03%	2.33%	0.00%	100.00%	0.00%
Cantor Fitzgerald Europe   549300KM6VU PKQLQX53	7.15%	6.98%	0.00%	100.00%	0.00%
<b>Interaction</b>	Execution				

<b>Class of Instrument</b>	<b>Other Instruments</b>				
<b>Notification if &lt;1 average trade per business day in the previous year</b>	No				
<b>Top five execution venues ranked in terms of trading volumes</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as a percentage of total in that class</b>	<b>Percentage of passive orders</b>	<b>Percentage of aggressive orders</b>	<b>Percentage of directed orders</b>
<b>Interaction</b>	Placed / Transmitted				

### **Other Instruments**

Other Instruments are stocks that do not fall into the major categories as defined in the RTS 28 EU Annexes document.

Execution of these instruments would not differ from Equities, Debt or ETP security types. Due to the high availability of liquidity across a number of different venues and the availability of in depth price discovery, we place the highest importance on price and then costs associated with execution. As we move into less liquid stocks then speed and likelihood of execution increase in priority but would be very unlikely to replace price or cost as the most important factors.

There are no specific arrangements concerning rebates or non-monetary benefits with any current execution venues.

Our Order Execution Policy does not treat different categories of clients differently and all execution decisions are made by a central desk who execute according to the Policy.

We transmit the majority of our overseas orders to UBS as it is our experience, when measuring execution quality, they will enable us to obtain at least as good results as may reasonably be expected from using alternative entities for execution.

Clients should be aware that UBS are our global custodian and while this simplifies and aids the settlement process it does not exclude them from the other execution factors assessed under the Best Execution requirements. As part of our standard monitoring, we analyse the performance of our counterparties against the differing products and assess whether we should continue to use them for that product or if there are venues or counterparties that we should add that will enhance our dealing process. If a material change occurs, we will notify our clients of that change and how it will impact our ability to meet the best execution requirements.