

REPORT PAPER

Regulatory Technical Standard 28 (RTS 28) Best Execution Report

2019

For today's investor



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Qualitative summary of our monitoring of execution quality in 2019

Aviva Investors conducts daily best execution monitoring and monthly transaction cost analysis to review execution performance and to ensure that the execution venues and counterparties selected for different instrument types continue to consistently provide the best possible result for clients. Transaction cost analysis (TCA) is used as a pre and post trade monitoring tool. Aviva Investors utilises independent providers, particular to each asset class, to measure both the market impact and opportunity costs of equity, fixed income and foreign exchange trades and trading strategies.

The Aviva Investors Trader Oversight Group (TOG) meets each month to review and challenge the performance of our trading teams and to assess our ongoing compliance with Aviva Investors' Global Order Execution Policy and best execution obligations. The TOG utilises TCA summary reports, 1st and 2nd line best execution monitoring, volume and venue trend analysis across all asset classes and instruments, post-trade operational reporting, as well as input from our legal team on the progress of onboarding new venues or counterparties.

Overview:	
Have there been any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders?	There have been no close links, conflicts of interests nor common ownerships with any execution venues or counterparties used by the firm. Aviva Investors has robust policies and procedures in place in order to ensure that arrangements with counterparties are in the best interest of clients. Some counterparties may offer Aviva Investors minor non-monetary benefits permissible under the Markets in Financial Instruments Directive 2014/65/EU (MiFID II) and our internal policies. A copy of our conflicts of interest policy is available upon request.
Are there any specific arrangements in place with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received?	There are no specific arrangements concerning payments made or received discounts, rebates or non-monetary benefits with any current execution venues.
Has the list of execution venues listed in the firm's execution policy changed in the period? If so, what factors that led to the change?	<p>FX – there were no material changes in 2019.</p> <p>Equities – One broker has managed to continue the momentum accomplished throughout 2018 and remains in the top 5 in four of the six categories for 2019. Another broker that did not feature on our RTS28 reporting in 2018 ranks in the top 5 in liquidity bands 1-2 and 5-6. This counterparty has rebuilt their coverage model, tailored to Aviva Investors strategy, as well as becoming increasingly competitive on Program Trading.</p> <p>Fixed Income – the transition to SONIA as the primary interest rate benchmark for sterling interest rate swaps has prompted a substantial up-tick in the proportion of volume traded in OTC Rates. Those counterparties that had existing bilateral positions with Aviva Investors have consequently seen a disproportionate increase in volume over and above other counterparties who did not have a significant back book to transition. Sonia-Libor transition trades have therefore had an impact on our Top 5 counterparties.</p> <p>Money Markets – New regulations for French Money Market funds came into force in January 2019 changing their liquidity structure towards more short-term liquidity. This resulted in significant issuance of overnight NEUCP (Negotiable European Commercial Paper) which led to the appearance of two counterparties in the top 5 that did not appear in our 2018 report.</p>
Explain 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.	Not applicable as the firm's clients are all categorised as professional.

<p>How has the firm used any data or tools relating to the quality of execution, including any data published under RTS 27?</p>	<p>In addition to our 1st and 2nd line monitoring of execution performance we utilise independent TCA, where we feel data quality is sufficient to generate worthwhile analysis.</p> <p>The output of this analysis is in line with our in-house monitoring and has not therefore materially affected our choice of venues in 2019.</p> <p>We had hoped to use RTS27 data to support the detailed analysis of any trade outliers (as highlighted by the application of our 1st line Best Execution tolerances for each asset class). Unfortunately, although the data is in a machine-readable format it is not possible to filter by ISIN.</p> <p>However, Aviva Investors has an ongoing programme of RTS27 investigation and we continue to explore ways in which we can leverage this data.</p> <p>Over the last year, we have met directly with a number of our counterparties to discuss their RTS 27 reports, as well as our TCA providers, who have started to develop data mining technology which may assist us over time.</p>
<p>How has the firm used the output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU.</p>	<p>In the absence of a consolidated tape we rely on third party providers to produce composite market information for some of the instruments we trade.</p> <p>We would welcome the production of a consolidated tape, particularly if it could be utilised efficiently.</p>

Aviva Investors takes into account various execution factors to determine the manner in which orders are executed, including but not limited to:

- Price
- Cost
- Size of the order
- Speed
- Likelihood of execution & settlement
- Nature of the Order
- Other considerations – e.g. investment objectives of the Portfolio Manager

The relative importance of these factors differs according to the instrument being traded and the particular trading strategy being deployed by the trader at that time.

Aviva Investors maintains a comprehensive list of approved brokers and venues for the provision of execution services, which is available to clients on request. A list of execution venues and broker entities with which Aviva Investors places or transmits orders for execution may change, as market structures evolve, and will be subject to ongoing monitoring and analysis for the quality of execution. The key factors considered in selecting venues and brokers will be:

- Market coverage: consideration of the coverage of global markets or specialist coverage by region.
- Instrument coverage: consideration of the expertise of the broker/venue across non-complex products and/or more diverse or complex products such as derivatives.
- Trading protocols: consideration of whether the counterparty offers RFQ (Request for quotation), list functionality, open trading, ALL to ALL, dark pool, crossing and other protocols.

- Cost to transact: consideration of whether the costs to transact with the counterparty are transparent and fair to all participants.
- Efficiency: Aviva Investors will also give due consideration to whether the venue can reduce operational risk by providing straight through processing directly from Aviva Investor's order management system through to settlement especially on more complex instruments such as derivatives.
- Reliability: Aviva Investors will assess whether the quality of the service provided by the broker or venue is of high standard, focusing on, inter alia, the availability of prices quoted and the robustness of those firms' IT infrastructure.

For your consideration:

Aviva Investors has chosen to aggregate its reporting under RTS 28 and Article 65(6) of the MiFID II Delegated Regulation into a single disclosure (Top 5 Counterparty Report). For each class of financial instrument Aviva Investors will only either place or execute client orders.

Any RTS 28 financial instrument not listed in this disclosure is not placed or executed by Aviva Investors. This document should be read in conjunction with the Aviva Investors Global Order Execution Policy.

The percentage of passive and aggressive orders for each Top 5 Counterparty Report have not been included as Aviva Investors does not execute equity or equity-like instruments directly in the market and does not operate an order book for non-equity instruments.

The percentage of directed orders has also not been included as Aviva Investors has full discretion on where client orders are placed or executed.

Aviva Investors monitors quality of execution via its first and second-line monitoring framework and independent TCA. Where Aviva Investors feels data is sufficient to generate worthwhile analysis, data from key trading venues and internal records is utilised. The outcomes of these monitoring activities are reviewed at our Trader Oversight Group and used to review and challenge our internal model and counterparties performance.

Explanation of Terms for Quantitative Tables

- Top 5 Execution Venues (name and venue identifier) ranked in terms of trading volumes in descending order
- Volume Traded (%) - Proportion of Volume Traded as a Percentage of total in the instrument class for the calendar year
- Orders Executed (%) - Proportion of Orders Executed as a Percentage of total in the instrument class for the calendar year
- Class of Instrument – European Securities and Markets Authority (ESMA) defined Class of Instrument Group
- <1 Average trade per business day - Flag to note if the Instrument Class traded fewer than one order per business day on average per calendar year. Takes values Y or N



Equities

Class of Instrument		Equities – Tick size liquidity bands 5 and 6 (from 2000 trades per day)	
Notification if <1 average trade per business day in the 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 asset class	
JP MORGAN SECURITIES PLC - K6Q0W1PS1L1O4IQL9C32	13.39%	13.93%	
GOLDMAN SACHS INTERNATIONAL - W22LROWP2IHZNBB6K528	12.24%	5.18%	
MORGAN STANLEY & CO INTERNATIONAL PLC - 4PQUHN3JPFQFN3BB653	9.91%	14.69%	
EXANE SA - 969500UP76J52A9OXU27	8.47%	2.18%	
MERRILL LYNCH INTERNATIONAL - GGDZP1UYGU9STUHRDP48	8.06%	3.83%	

Class of Instrument		Equities – Tick size liquidity bands 3 and 4 (from 80 to 1999 trades per day)	
Notification if <1 average trade per business day in the 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 asset class	
JP MORGAN SECURITIES PLC - K6Q0W1PS1L1O4IQL9C32	9.42%	9.89%	
UBS AG - BFM8T61CT2L1QCEMIK50	9.33%	11.54%	
LIQUIDNET EUROPE LIMITED - 213800ZIRB79BE5XQM68	7.41%	1.19%	
JEFFERIES INTERNATIONAL LTD - S5THZMDUJCTQZBTRVI98	7.23%	1.41%	
EXANE SA - 969500UP76J52A9OXU27	6.91%	1.78%	

Class of Instrument		Equities – Tick size liquidity bands 1 and 2 (from 0 to 79 trades per day)	
Notification if <1 average trade per business day in the 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 asset class	
JP MORGAN SECURITIES PLC - K6Q0W1PS1L1O4IQL9C32	22.43%	16.91%	
MORGAN STANLEY & CO INTERNATIONAL PLC - 4PQUHN3JPFQFN3BB653	17.47%	14.57%	
UBS AG - BFM8T61CT2L1QCEMIK50	11.16%	17.13%	
GOLDMAN SACHS INTERNATIONAL - W22LROWP2IHZNBB6K528	9.63%	7.95%	
CITIGROUP GLOBAL MARKETS LIMITED - XKZZ2JZF41MRHTR1V493	5.99%	10.38%	

Class of Instrument		Equities – Other ¹	
Notification if <1 average trade per business day in the 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 asset class	
UBS AG - BFM8T61CT2L1QCCEMIK50	20.64%	29.57%	
JP MORGAN SECURITIES PLC - K6Q0W1PS1L1O4IQL9C32	19.28%	31.20%	
CREDIT SUISSE SECURITIES (EUROPE) LTD - DL6FFRRLF74S01HE2M14	13.16%	9.77%	
MACQUARIE CAPITAL (EUROPE) LIMITED - 549300GX4FPMFF91RJ37	12.05%	3.67%	
CLSA (UK) - 213800VZMAGVIU2IJA72	6.30%	1.66%	

Class of Instrument		Exchanged Traded Products ²	
Notification if <1 average trade per business day in the 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 asset class	
CITIGROUP GLOBAL MARKETS LIMITED - XKZZ2JZF41MRHTR1V493	35.03%	42.05%	
VIRTU ITG EUROPE LIMITED - 213800EEC95PRUCEUP63	11.32%	2.32%	
SOCIETE GENERALE SA - O2RNE8IBXP4ROTD8PU41	10.93%	1.37%	
MORGAN STANLEY & CO INTERNATIONAL PLC - 4PQUHN3JPFGFNF3BB653	8.32%	4.90%	
KEPLER CHEUVREUX SA - 9695005EOZG9X8IRJD84	7.23%	1.12%	

1. Equities Other – This table encompasses the balance of our activity not already included in the preceding ESMA defined Equity classes.

2. ESMA Guidance on this table recommends the inclusion of REITs. Please note we have executed significant volume in this instrument type in 2019 – in addition to our normal activity in ETFs.

Class of Instrument	Securitized Derivatives - Warrants and Certificate Derivatives	
Notification if <1 average trade per business day in the 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 asset class
CLSA (UK) - 213800VZMAGVIU2IJA72	45.76%	58.62%
ATLANTIC EQUITIES LLP - 213800327M9B4D9S1553	39.77%	3.45%
KEPLER CHEUVREUX SA - 9695005EOZG9X8IRJD84	12.21%	13.79%
MACQUARIE CAPITAL (EUROPE) LIMITED - 549300GX4FPMFF91RJ37	1.79%	13.79%
ODDO BHF SCA - 9695002I9DJHZ3449O66	0.24%	6.90%

Due to the liquid nature of the majority of equity trades, for orders of a normal market size, Aviva Investors places the highest importance on price, followed by likelihood of execution. For large size programme trades or illiquid securities one broker may be selected based on previous experience in handling orders in that region or security.

The top five brokers have a broad trading coverage of cash equity and program trading globally which is consistent across all liquidity bands.

We currently use the electronic trading product suites of six brokers, plus one test broker. These brokers are reviewed bi-annually based on TCA, trading service and overall performance. An Algo Trading wheel is used as a data driven broker selection tool for a portion of our electronic orders.



Fixed Income

Rates and Credit

With respect to the percentage of trades that we placed on an MTF (Multi-lateral trading facility) as opposed to voice see the below:

Venue	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that asset class
Tradeweb	49.79%	47.16%
Bloomberg	29.39%	30.43%
Market Axess	2.49%	7.22%
Liquidnet	0.60%	2.33%
Venue Total	82.26%	87.14%

Our use of MTFs for Fixed Income activity has increased YoY since the publication of our RTS 28 Report. In 2017 the total by volume was 31.74% and 52.88% for proportion of orders executed, compared with 72.31% and 87.08% for 2018 and 82.26% and 87.14% for 2019.

This data suggests that liquidity in electronically traded Fixed Income products continues to improve, however the proportion of volume traded on MTF's in 2019 is much more in line with 2018 compared to 2017. It is also worth highlighting that we also input 'process trades' via these platforms to ensure the downstream efficiency of our post-trade reporting obligations.

The proportion of volume traded on Bloomberg doubled in 2019 vs 2018 (from 14.89% to 29.39%), this was mainly due to the huge increase in activity for Emerging Markets.

Class of Instrument	Debt Instruments - Bonds	
Notification if <1 average trade per business day in the 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 asset class
CITIGROUP GLOBAL MARKETS LIMITED - XKZZ2JZF41MRHTR1V493	8.95%	9.71%
NATWEST MARKETS PLC - RR3QWICWWIPCS8A4S074	7.30%	5.71%
HSBC BANK PLC - MP6I5ZYZBEU3UXPYFY54	7.28%	8.09%
BARCLAYS BANK PLC - G5GSEF7VJP5I7OUK5573	7.02%	7.40%
LLOYDS BANK CORPORATE MARKETS PLC - 213800MBWEIJDM5CU638	6.36%	4.43%

Due to the liquid nature of the markets Aviva Investors transacts in Fixed Income (FI) rates, for orders in normal market size the greatest emphasis is placed on price, followed by likelihood of execution/ settlement and speed. Normal market-sized trades are executed on electronic trading venues whenever possible.

For large-sized orders, or orders in a less-liquid currency, a single bank maybe selected to price or work all or part of the order. This counterparty would be selected on previous experience in handling such orders, and any axes they may have. In this case price is still the main consideration, but the size of the order able to be traded and likelihood of execution and settlement also become very important factors.

The top five venues for Fixed Income reflect the performance of these counterparties across the range of currencies and order sizes traded. Despite an increase in EUR activity YoY, GBP is still a significant proportion of the overall trading volumes. Specifically, Citigroup had a stronger year in 2019 versus 2018, otherwise our counterparty list remained broadly similar to 2018.

Fixed Income Credit can sometimes be a very illiquid market. Therefore, the likelihood of execution is placed alongside price as the key execution factors.

The top five venues for Fixed Income Credit during 2019 have provided trading coverage across the wide range of credit sectors that Aviva Investors trade. These venues provide consistent pricing in all market conditions and have the ability to utilise their balance sheet to facilitate trading. Also considered is the breadth of distribution channels offered to provide better execution coverage. In addition, hit ratios on MTF trading venues for RFQ enquiry will also be taken into account.



Exchange Traded (ETD) & OTC Derivatives

Class of Instrument		Equity Derivatives - Options and Futures (Futures & Listed/OTC Options)	
Notification if <1 average trade per business day in the 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 asset class	
CREDIT SUISSE SECURITIES (EUROPE) LTD - DL6FFRRLF74S01HE2M14	16.24%	14.59%	
MERRILL LYNCH INTERNATIONAL - GGDZP1UYGU9STUHRDP48	12.86%	12.18%	
MORGAN STANLEY INTERNATIONAL - 4PQUHN3JPPGFNF3BB653	12.54%	13.62%	
J.P. MORGAN SECURITIES PLC - K6Q0W1PS1L1O4IQL9C32	10.84%	7.84%	
GOLDMAN SACHS - W22LROWP2IHZNBB6K528	9.04%	9.81%	

Class of Instrument		Equity Derivatives - Swaps and other Equity Derivatives (TRS & Variance Swaps)	
Notification if <1 average trade per business day in the 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 asset class	
CITIGROUP GLOBAL MARKETS LIMITED - XKZZ2JZF41MRHTR1V493	51.31%	2.47%	
SOCIETE GENERALE SA - O2RNE8IBXP4R0TD8PU41	43.24%	35.80%	
MERRILL LYNCH INTERNATIONAL - GGDZP1UYGU9STUHRDP48	2.67%	28.40%	
CITIBANK NA - E57ODZWZ7FF32TWEFA76	1.99%	3.70%	
JP MORGAN SECURITIES PLC - K6Q0W1PS1L1O4IQL9C32	0.79%	29.63%	

Class of Instrument		Interest Rate Derivatives - Swaps, forwards and other interest rates derivatives	
Notification if <1 average trade per business day in the 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 asset class	
MORGAN STANLEY & CO INTERNATIONAL PLC - 4PQUHN3JPFQFN3BB653	11.82%	8.90%	
JP MORGAN SECURITIES PLC - K6Q0W1PS1L1O4IQL9C32	10.72%	15.63%	
DEUTSCHE BANK AG - 7LTFWZYICNSX8D621K86	10.12%	7.59%	
GOLDMAN SACHS INTERNATIONAL - W22LROWP2IHZNBB6K528	10.09%	10.59%	
MERRILL LYNCH INTERNATIONAL - GGDZP1UYGU9STUHRDP48	7.52%	5.81%	

Class of Instrument		Interest Rate Derivatives – Futures and Options admitted to trading on a trading venue (ETD & Swaptions)	
Notification if <1 average trade per business day in the 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 asset class	
BARCLAYS BANK PLC - G5GSEF7VJP5I7OUK5573	11.63%	10.09%	
GOLDMAN SACHS INTERNATIONAL - W22LROWP2IHZNBB6K528	10.71%	13.66%	
JP MORGAN SECURITIES PLC - K6Q0W1PS1L1O4IQL9C32	10.57%	12.43%	
MERRILL LYNCH INTERNATIONAL - GGDZP1UYGU9STUHRDP48	10.27%	11.36%	
CITIGROUP GLOBAL MARKETS LIMITED - XKZZ2JZF41MRHTR1V493	9.92%	7.50%	

Class of Instrument		Credit Derivatives - Other Credit Derivatives (Index/ Single name & tranche CDS)	
Notification if <1 average trade per business day in the 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 asset class	
JP MORGAN SECURITIES PLC - K6Q0W1PS1L1O4IQL9C32	23.12%	15.90%	
GOLDMAN SACHS INTERNATIONAL - W22LROWP2IHZNBB6K528	22.38%	17.01%	
CITIGROUP GLOBAL MARKETS LIMITED - XKZZ2JZF41MRHTR1V493	12.39%	15.58%	
BARCLAYS BANK PLC - G5GSEF7VJP5I7OUK5573	9.05%	16.85%	
GOLDMAN SACHS BANK USA - KD3XUN7C6T14HNAYLU02	8.96%	2.38%	

Class of Instrument		Credit Derivatives - Other Credit Derivatives (CDS Options)	
Notification if <1 average trade per business day in the 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 asset class	
BNP PARIBAS SA - R0MUWSFPU8MPRO8K5P83	43.00%	32.14%	
CITI GLOBAL MARKETS LIMITED - XKZZ2JZF41MRHTR1V493	36.99%	42.86%	
JP MORGAN SECURITIES LTD - K6Q0W1PS1L1O4IQL9C32	18.15%	10.71%	
BARCLAYS BANK PLC - G5GSEF7VJP5I7OUK5573	1.85%	14.29%	

Class of Instrument		Currency Derivatives - Futures and options admitted to trading on a trading venue	
Notification if <1 average trade per business day in the 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 asset class	
GOLDMAN SACHS INTERNATIONAL - W22LROWP2IHZNBB6K528	32.84%	39.24%	
STANDARD CHARTERED BANK - RILFO74KP1CM8P6PCT96	20.03%	16.46%	
CITIBANK, NA - E57ODZWZ7FF32TWEFA76	13.22%	6.33%	
MERRILL LYNCH INTERNATIONAL - GGDZP1UYGU9STUHRDP48	13.11%	5.06%	
BARCLAYS BANK PLC - G5GSEF7VJP517OUK5573	6.95%	3.80%	

The relative importance of the execution factors for OTC derivatives and exchange traded derivatives is for the most part governed by the complexity of both the financial instrument and the asset class. However, as a default, price and likelihood of execution rank above other factors. Client eligibility (in terms of ISDA/CDEA documentation) is a factor in the counterparty selection process.

Regardless of asset class, where OTC derivatives are not traded on a trading venue, the fairness of the price proposed by the eligible counterparty or counterparties is checked using independent reference data. A fair market valuation is based on an assessment of this data and current liquidity conditions prior to execution. The ability to execute larger orders, may take preference if it is deemed to minimise any potential adverse market impact on the final execution. This independent price data is reviewed by the 1st line control process on a post-trade basis.

With regard to ETDs, normal market-sized orders are executed by the counterparty in the form of a Care Order. The greatest emphasis is on price and the speed of execution. For larger-sized orders, Block size or over, Care Order may be used or a counterparty may be asked for a risk price to trade the whole order depending on market liquidity at the time. This counterparty would be selected on previous experience in handling such orders, and any axes they may have.

In this case price is still the main consideration, but the size of the order able to be traded and likelihood of execution and settlement are also important factors.

The top five venues for ETDs reflect the performance of these counterparties in providing competitive pricing of risk across the range of currencies and order sizes traded.



Foreign exchange

Class of Instrument	Currency Derivatives - Swaps, forwards and other currency derivatives	
Notification if <1 average trade per business day in the 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 asset class
GOLDMAN SACHS INTERNATIONAL - W22LROWP2IHZNBB6K528	14.47%	12.32%
JP MORGAN CHASE BANK, NA - 7H6GLXDRUGQFU57RNE97	13.43%	12.12%
CITIBANK, NA - E57ODZWZ7FF32TWEFA76	11.12%	8.84%
MERRILL LYNCH INTERNATIONAL - GGDZP1UYGU9STUHRDP48	8.14%	9.96%
BARCLAYS BANK PLC - G5GSEF7VJP5I7OUK5573	7.47%	8.03%

Due to the highly liquid nature of the foreign exchange market, for orders of a normal market size, Aviva Investors places the highest importance on price, followed by likelihood of execution. The majority of orders are executed electronically via a multibank streaming price platform.

For larger orders or those in an illiquid currency pair, the size of the order may make electronic execution impractical. In these cases, a smaller number of counterparties may be chosen to price in competition, or if the order is significantly sized a single bank may be chosen to work all or part of the order. Client eligibility is a factor in our counterparty selection process.

The top five venues for FX are reflective of the relative outperformance of these counterparties across both methods of execution and are in line with our in-house monitoring.

Irrespective of the method of execution, the vast majority of our FX trades will be either priced in competition or post-trade allocated through an MTF. For reference the table below reflects the split between the MTFs we currently utilise.

Venue	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that asset class
FX All	56.67%	67.82%
FX Connect	38.94%	26.82%
Bloomberg	4.08%	5.21%
Venue Total	99.69%	99.84%



Money Market Instruments

Class of Instrument		Money Market	
Notification if <1 average trade per business day in the 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 asset class	
TULLETT PREBON (SECURITIES) LIMITED - 549300BMVW85YF9FGN67	15.53%	9.61%	
CREDIT AGRICOLE CORPORATE AND INVESTMENT BANK SA - 1VUV7VQFKUOQSJ21A208	11.18%	8.54%	
BGC BROKERS LP - ZWNFQ48RUL8VJZ2AIC12	9.72%	9.24%	
LA BANQUE POSTALE - 96950066U5XAAIRCPA78	8.48%	4.33%	
TRADITION LONDON CLEARING LIMITED - 549300035Z3DHK2T4A54	7.61%	5.90%	

Whilst price is an important factor in the execution of Money Market instruments, the nature of the order (credit quality of issue for example) and the likelihood of execution are equally as relevant. For any tradable money market instrument a competing price may be sought, however due to their nature, Aviva Investors may only be able to source from one party. As a consequence, money market trades are executed in close collaboration with the instructing portfolio manager to ensure our execution strategy aligns with their investment objective.

The top five venues for Money Market instruments are reflective of the relative outperformance of these counterparties based on the trading strategies we deploy.



Securities Financing Transactions

Securities Financing Transactions		
Class of Instrument		
Notification if <1 average trade per business day in the previous year	N	
Top 5 venues ranked in terms of volume (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that asset class
Santander UK - PTCQB104N23FMNK2RZ28	18.45%	4.24%
Royal Bank of Canada - ES7IP3U3RHIGC71XBU11	13.94%	4.43%
Barclays Bank PLC - G5GSEF7VJP5I7OUK5573	12.96%	6.24%
BNP Paribas SA - R0MUWSFPU8MPRO8K5P83	11.35%	13.23%
Scotia Bank Europe plc - L3I9ZG2KFGXZ61BMYR72	8.07%	3.45%

The most important execution factor is price. Additional factors would be speed of execution/confirmation and timely/efficient settlement. Another factor taken into account is the available counterparty credit limit, which can often have an impact on the selection of the counterparty.

The top five counterparties for Securities Financing Transactions detailed in the quantitative report are reflective of the relative outperformance of these counterparties based on the trading strategies we deploy.

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