

SARANAC

PARTNERS

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# RTS 28 Report 2017

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# Saranac Partners RTS 28 Report 2017

**Saranac Partners Limited** (“Saranac Partners”) is required to put in place arrangements to enable it to deliver best execution, as defined in MiFID, and the rules of the UK Financial Conduct Authority (the “FCA”). The best execution regime requires investment firms to take all reasonable steps to obtain the best possible result for their clients when transacting in financial instruments. The extent of these obligations will vary depending upon the firm’s role in the execution of the transaction. Where Saranac Partners passes orders in financial instruments directly to a custodian selected by the client, Saranac Partners is required to operate in the client’s “best interests” and the client’s custodian retains the obligation to provide best execution. The vast majority of orders are executed on this basis, therefore the top 5 venue statistics below are dominated by these custodians. If Saranac Partners chooses to execute the order directly with an execution venue, which is then settled by the client’s custodian, it is Saranac Partners’ responsibility to obtain best execution, on your behalf. In this case Saranac Partners owes clients “best execution”. Should the client issue specific instructions to Saranac Partners on the choice of execution venue this will be treated as “directed order”.

As part of MiFID, RTS 28 requires Saranac Partners to provide an annual report showing the percentage of transactions executed on each of the top 5 execution venues utilised across a variety of asset types. The data below relates to the period between 3 May 2017, when Saranac Partners gained FCA authorisation in its own right, to 31 December 2017. In respect of each asset class we are required to provide narrative in answer to questions posed, lettered a) to h).

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# Equities

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- (a) 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 majority of orders received to transact in equities are transmitted to the client's custodian for execution unamended. Should Saranac Partners deem it desirable to manage or divert the client's order, subject to any specific instructions that we accept from the client, the factors that Saranac Partners consider in order to determine the manner in which an order will be executed are price, costs, speed, likelihood of execution and settlement, together with any other consideration relevant to the execution of the order.

Such considerations include:

- the availability of liquidity
- the market impact of the order
- the availability of appropriate credit lines, if relevant
- characteristics of the client, including client suitability and investment restrictions
- available execution venues

In the absence of specific instructions from the client, Saranac Partners will exercise its discretion to determine which of these factors, or combination of them, will be relevant to achieve the best result.

- (b) a description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders;

Saranac Partners does not have any close links, conflicts of interest or common ownership, with respect to any of the execution venues listed.

- (c) a description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received;

Saranac Partners has negotiated very competitive brokerage fees for clients utilising Credit Suisse London, Guernsey and Zurich. Saranac Partners does not itself benefit from any rebates or non-monetary benefits.

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|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (d) 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;                                                                                                                      | During 2017 Saranac Partners entered into an agreement with one or more clients to utilise J P Morgan International Ltd as their custodian and broker. Therefore, a proportion of orders are now directed to J P Morgan International Ltd for execution.                                                                                                                                                                                   |
| (e) 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;                                                                       | Currently all of Saranac Partners' clients are classified as Retail for the purposes of the instrument types covered by this report. All orders are therefore treated in exactly the same way by Saranac Partners.                                                                                                                                                                                                                         |
| (f) 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; | The primary driver of venue choice is determined by the client's choice of custodian/broker who will owe our mutual clients a duty of best execution.                                                                                                                                                                                                                                                                                      |
| (g) an explanation of how the investment firm has used any data or tools relating to the quality of execution, including any data published under Commission Delegated Regulation (EU) 2017/575 [RTS 27];                                                                     | We closely monitor execution quality of clients' chosen custodians on a trade by trade basis to ensure it is executed on the best terms available. Clients' chosen custodians will be obliged to produce detailed analysis on execution performance on a quarterly basis from June 2018 onwards. Once we have sight of these reports we will be in a position to assess the performance of each of these custodians with their peer group. |
| (h) where applicable, an explanation of how the investment firm has used output of a consolidated tape provider established under Article 65 of Directive                                                                                                                     | The provisions of Article 65 do not apply until September 2019.                                                                                                                                                                                                                                                                                                                                                                            |
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## Equities

Class of Instrument	Equities - Share & Depository Receipts 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	No				
Top five execution venues ranked in terms of trading volumes and LEI number	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
Credit Suisse (UK) Limited 549300GUAMON5OX2OO54	53.6%	47.3%	0	0	0
Credit Suisse AG ANGGYXNX0JLX3X63JN86	34.7%	49.5%	0	0	0
J.P. Morgan International Bank Ltd PGBWEZU4QUV2UVGWJC76	11.7%	3.2%	0	0	0

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# Debt Instruments

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(a) 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 majority of orders received to transact in debt instruments are transmitted to the client's custodian for execution unamended. Should Saranac Partners deem it desirable to manage or divert the client's order, subject to any specific instructions that we accept from the client, the factors that Saranac Partners consider in order to determine the manner in which an order will be executed are price, costs, speed, likelihood of execution and settlement, together with any other consideration relevant to the execution of the order.

Such considerations include:

- the availability of liquidity
- the market impact of the order
- the availability of appropriate credit lines, if relevant
- characteristics of the client, including client suitability and investment restrictions
- available execution venues

In the absence of specific instructions from the client, Saranac Partners will exercise its discretion to determine which of these factors, or combination of them, will be relevant to achieve the best result.

(b) a description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders;

Saranac Partners does not have any close links, conflicts of interest or common ownership, with respect to any of the execution venues listed.

(c) a description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received;

Saranac Partners has negotiated very competitive brokerage fees for clients utilising Credit Suisse London, Guernsey and Zurich.

(d) 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;

During 2017 Saranac Partners entered into an agreement with one or more clients to utilise J P Morgan International Ltd as their custodian and broker. Therefore, a proportion of orders are now directed to J P Morgan International Ltd for execution.

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(e) 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;

Currently all of Saranac Partners' clients are classified as Retail for the purposes of the instrument types covered by this report.

(f) 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;

The primary driver of venue choice is driven by the client's choice of custodian/broker who will owe our mutual clients a duty of best execution.

(g) an explanation of how the investment firm has used any data or tools relating to the quality of execution, including any data published under Commission Delegated Regulation (EU) 2017/575 [RTS 27];

We closely monitor execution quality of clients' chosen custodians on a trade by trade basis to ensure it is executed on the best terms available. Clients' chosen custodians will be obliged to produce detailed analysis on execution performance on a quarterly basis from June 2018 onwards. Once we have sight of these reports we will be in a position to assess the performance of each of these custodians with their peer group.

(h) where applicable, an explanation of how the investment firm has used output of a consolidated tape provider established under Article 65 of Directive

The provisions of Article 65 do not apply until September 2019.

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## Debt Instruments

Class of Instrument	Debt Instruments - Bonds				
Notification if <1 average trade per business day in the previous year	No				
Top five execution venues ranked in terms of trading volumes and LEI number	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
Credit Suisse AG ANGGYXNX0JLX3X63JN86	38.0%	57.4%	0	0	0
Credit Suisse (UK) Limited 549300GUAMON5OX2OO54	36.1%	38.1%	0	0	0
J.P. Morgan International Bank Ltd PGBWEZU4QUV2UVGWJC76	25.9%	4.4%	0	0	0

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# Structured Finance Instruments

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- (a) 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;

Subject to any specific instructions that we accept from the client, the factors that Saranac Partners consider in order to determine the manner in which an order will be executed are price, costs, speed, likelihood of execution and settlement, together with any other consideration relevant to the execution of the order.

Such considerations include:

- minimum bite size
- product features
- availability and variety of different pay-off profiles
- characteristics of the client, including client suitability and investment restrictions
- available issuers
- issuer risk

In the absence of specific instructions from the client, Saranac Partners will exercise its discretion to determine which of these factors, or combination of them, will be relevant to achieve the best result.

- (b) a description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders;

Saranac Partners does not have any close links, conflicts of interest or common ownership, with respect to any of the execution venues listed.

- (c) a description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received;

Saranac Partners has negotiated very competitive brokerage fees for clients utilising Credit Suisse London, Guernsey and Zurich.

- (d) 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;

N/A

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(e) 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;

Currently all of Saranac Partners' clients are classified as Retail for the purposes of the instrument types covered by this report.

(f) 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;

The primary driver of venue choice is driven by the client's choice of custodian/broker who will owe our mutual clients a duty of best execution. We will however, for certain asset classes use alternative venues where we believe better execution results are available.

(g) an explanation of how the investment firm has used any data or tools relating to the quality of execution, including any data published under Commission Delegated Regulation (EU) 2017/575 [RTS 27];

We closely monitor execution quality of clients' chosen custodians on a trade by trade basis to ensure it is executed on the best terms available. Clients' chosen custodians will be obliged to produce detailed analysis on execution performance on a quarterly basis from June 2018 onwards. Once we have sight of these reports we will be in a position to assess the performance of each of these custodians with their peer group.

(h) where applicable, an explanation of how the investment firm has used output of a consolidated tape provider established under Article 65 of Directive

The provisions of Article 65 do not apply until September 2019.

## Structured Finance Instruments

Class of Instrument	Structured Finance Instruments				
Notification if <1 average trade per business day in the previous year	Yes				
Top five execution venues ranked in terms of trading volumes and LEI number	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
Credit Suisse (UK) Limited 549300GUAMON5OX2OO54	100%	0	0	0	0

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# Equity Derivatives

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- (a) 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 majority of orders received to transact in equity derivatives are transmitted to the client's custodian for execution unamended. Should Saranac Partners deem it desirable to manage or divert the client's order, subject to any specific instructions that we accept from the client, the factors that Saranac Partners consider in order to determine the manner in which an order will be executed are price, costs, speed, likelihood of execution and settlement, together with any other consideration relevant to the execution of the order.

Such considerations include:

- the availability of liquidity
- the market impact of the order
- the availability of appropriate credit lines, if relevant
- characteristics of the client, including client suitability and investment restrictions
- available execution venues

In the absence of specific instructions from the client, Saranac Partners will exercise its discretion to determine which of these factors, or combination of them, will be relevant to achieve the best result.

- (b) a description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders;

Saranac Partners does not have any close links, conflicts of interest or common ownership, with respect to any of the execution venues listed.

- (c) a description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received;

Saranac Partners has negotiated very competitive brokerage fees for clients utilising Credit Suisse London, Guernsey and Zurich.

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|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (d) 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;                                                                                                                      | During 2017 Saranac Partners entered into an agreement with one or more clients to utilise J P Morgan International Ltd as their custodian and broker. Therefore, a proportion of orders are now directed to J P Morgan International Ltd for execution.                                                                                                                                                                                   |
| (e) 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;                                                                       | Currently all of Saranac Partners clients are classified as Retail for the purposes of the instrument types covered by this report.                                                                                                                                                                                                                                                                                                        |
| (f) 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; | The primary driver of venue choice is driven by the client's choice of custodian/broker who will owe our mutual clients a duty of best execution.                                                                                                                                                                                                                                                                                          |
| (g) an explanation of how the investment firm has used any data or tools relating to the quality of execution, including any data published under Commission Delegated Regulation (EU) 2017/575 [RTS 27];                                                                     | We closely monitor execution quality of clients' chosen custodians on a trade by trade basis to ensure it is executed on the best terms available. Clients' chosen custodians will be obliged to produce detailed analysis on execution performance on a quarterly basis from June 2018 onwards. Once we have sight of these reports we will be in a position to assess the performance of each of these custodians with their peer group. |
| (h) where applicable, an explanation of how the investment firm has used output of a consolidated tape provider established under Article 65 of Directive                                                                                                                     | The provisions of Article 65 do not apply until September 2019.                                                                                                                                                                                                                                                                                                                                                                            |
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## Equity Derivatives

Class of Instrument	Equity Derivatives - Options and Futures admitted to trading on a trading venue				
Notification if <1 average trade per business day in the previous year	Yes				
Top five execution venues ranked in terms of trading volumes and LEI Number	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
Credit Suisse (UK) Limited 549300GUAMON5OX2OO54	69.4%	90.1%	0	0	0
Credit Suisse AG ANGGYXNX0JLX3X63JN86	21.2%	8.5%	0	0	0
J.P. Morgan International Bank Ltd PGBWEZU4QUV2UVGWJJC76	9.3%	1.4%	0	0	0

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# Exchange Traded Products

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(a) 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 majority of orders received to transact in exchange traded products are transmitted to the client's custodian for execution unamended. Should Saranac Partners deem it desirable to manage or divert the clients order, subject to any specific instructions that we accept from the client, the factors that Saranac Partners consider in order to determine the manner in which an order will be executed are price, costs, speed, likelihood of execution and settlement, together with any other consideration relevant to the execution of the order.

Such considerations include:

- the availability of liquidity
- the market impact of the order
- the availability of appropriate credit lines, if relevant
- characteristics of the client, including client suitability and investment restrictions
- available execution venues

In the absence of specific instructions from the client, Saranac Partners will exercise its discretion to determine which of these factors, or combination of them, will be relevant to achieve the best result.

(b) a description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders;

Saranac Partners does not have any close links, conflicts of interest or common ownership, with respect to any of the execution venues listed.

(c) a description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received;

Saranac Partners has negotiated very competitive brokerage fees for clients utilising Credit Suisse London, Guernsey and Zurich.

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|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (d) 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;                                                                                                                      | During 2017 Saranac Partners entered into an agreement with one or more clients to utilise J P Morgan International Ltd as their custodian and broker. Therefore, a proportion of orders are now directed to J P Morgan International Ltd for execution.                                                                                                                                                                                 |
| (e) 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;                                                                       | Currently all of Saranac Partners clients are classified as Retail for the purposes of the instrument types covered by this report.                                                                                                                                                                                                                                                                                                      |
| (f) 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; | The primary driver of venue choice is driven by the client's choice of custodian/broker who will owe our mutual clients a duty of best execution.                                                                                                                                                                                                                                                                                        |
| (g) an explanation of how the investment firm has used any data or tools relating to the quality of execution, including any data published under Commission Delegated Regulation (EU) 2017/575 [RTS 27];                                                                     | We closely monitor execution quality of clients chosen custodians on a trade by trade basis to ensure it is executed on the best terms available. Clients chosen custodians will be obliged to produce detailed analysis on execution performance on a quarterly basis from June 2018 onwards. Once we have sight of these reports we will be in a position to assess the performance of each of these custodians with their peer group. |
| (h) where applicable, an explanation of how the investment firm has used output of a consolidated tape provider established under Article 65 of Directive                                                                                                                     | The provisions of Article 65 do not apply until September 2019.                                                                                                                                                                                                                                                                                                                                                                          |
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## Exchange Traded Products

Class of Instrument	Exchange Traded Products				
Notification if <1 average trade per business day in the previous year	No				
Top five execution venues ranked in terms of trading volumes and LEI	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
Credit Suisse (UK) Limited 549300GUAMON5OX2OO54	69.5%	89.9%	0	0	0
Credit Suisse AG ANGGYXNX- 0JLX3X63JN86	22.1%	8.7%	0	0	0
J.P. Morgan International Bank Ltd PGBWEZU4QUV2UVGWJC76	8.4%	1.4%	0	0	0

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# Other

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- (a) 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 majority of orders received to transact in 'other' products are transmitted to the client's custodian for execution unamended. Should Saranac Partners deem it desirable to manage or divert the client's order, subject to any specific instructions that we accept from the client, the factors that Saranac Partners consider in order to determine the manner in which an order will be executed are price, costs, speed, likelihood of execution and settlement, together with any other consideration relevant to the execution of the order.

Such considerations include:

- the availability of liquidity
- the market impact of the order
- the availability of appropriate credit lines, if relevant
- characteristics of the client, including client suitability and investment restrictions
- available execution venues

In the absence of specific instructions from the client, Saranac Partners will exercise its discretion to determine which of these factors, or combination of them, will be relevant to achieve the best result.

- (b) a description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders;

Saranac Partners does not have any close links, conflicts of interest or common ownership, with respect to any of the execution venues listed.

- (c) a description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received;

Saranac Partners has negotiated very competitive brokerage fees for clients utilising Credit Suisse London, Guernsey and Zurich.

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|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (d) 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;                                                                                                                      | During 2017 Saranac Partners entered into an agreement with one or more clients to utilise J P Morgan International Ltd as their custodian and broker. Therefore, a proportion of orders are now directed to J P Morgan International Ltd for execution.                                                                                                                                                                                   |
| (e) 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;                                                                       | Currently all of Saranac Partners clients are classified as Retail for the purposes of the instrument types covered by this report.                                                                                                                                                                                                                                                                                                        |
| (f) 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; | The primary driver of venue choice is driven by the client's choice of custodian/broker who will owe our mutual clients a duty of best execution.                                                                                                                                                                                                                                                                                          |
| (g) an explanation of how the investment firm has used any data or tools relating to the quality of execution, including any data published under Commission Delegated Regulation (EU) 2017/575 [RTS 27];                                                                     | We closely monitor execution quality of client's chosen custodians on a trade by trade basis to ensure it is executed on the best terms available. Client's chosen custodians will be obliged to produce detailed analysis on execution performance on a quarterly basis from June 2018 onwards. Once we have sight of these reports we will be in a position to assess the performance of each of these custodians with their peer group. |
| (h) where applicable, an explanation of how the investment firm has used output of a consolidated tape provider established under Article 65 of Directive                                                                                                                     | The provisions of Article 65 do not apply until September 2019.                                                                                                                                                                                                                                                                                                                                                                            |
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## Other

Class of Instrument	Other				
Notification if <1 average trade per business day in the previous year	No				
Top five execution venues ranked in terms of trading volumes and LEI	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
Credit Suisse (UK) Limited 549300GUAMON5OX2OO54	69.5%	89.9%	0	0	0
Credit Suisse AG ANGGYXNX0JLX3X63JN86	22.1%	8.7%	0	0	0
J.P. Morgan International Bank Ltd PGBWEZU4QUV2UVGWJC76	8.4%	1.4%	0	0	0