

MiFID II Best Execution RTS28 / Article 65(6) Disclosures

For the period 01/01/2020 to 31/12/2020

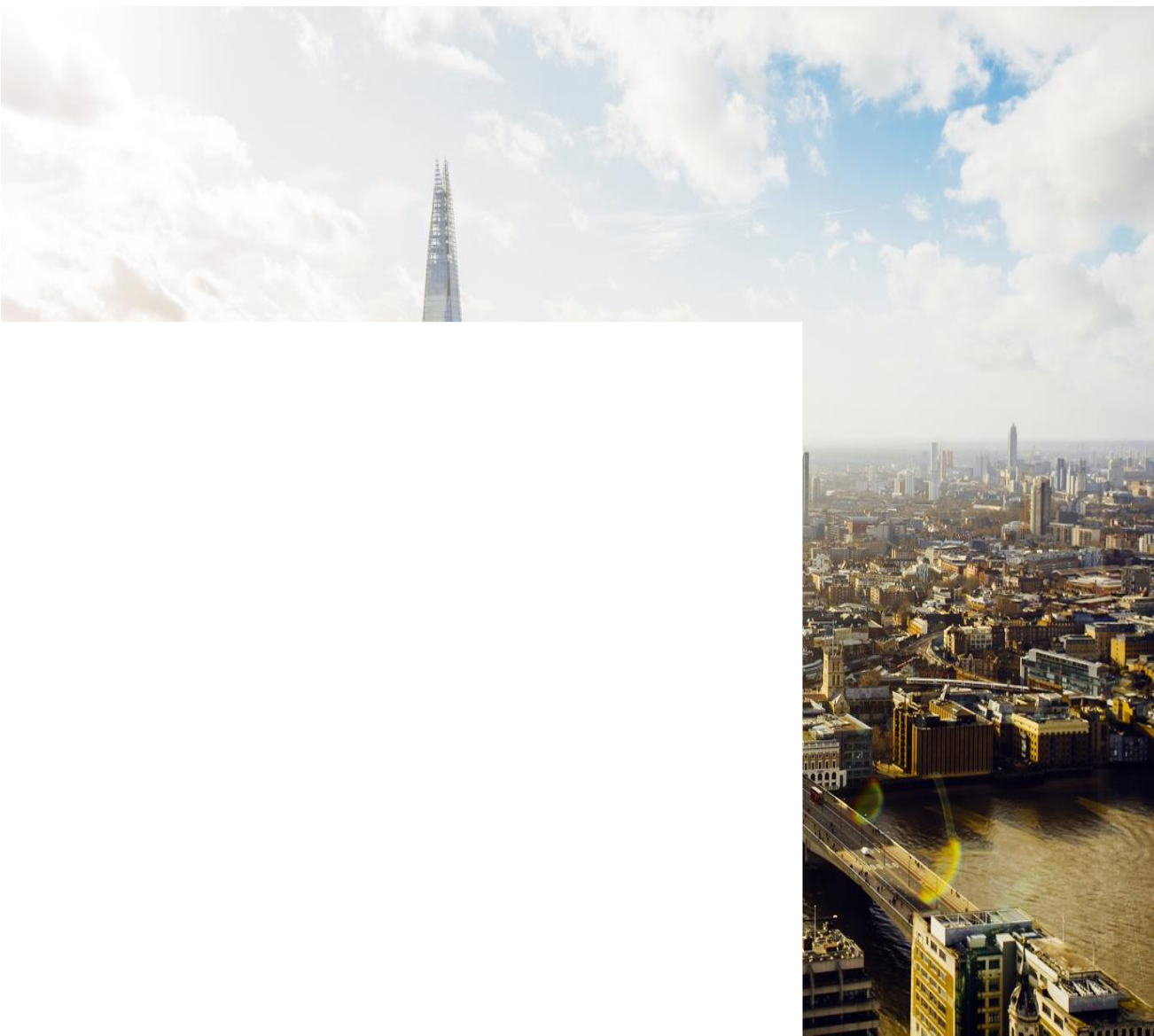


Table of Contents

1	CONTEXT	3
2	OVERVIEW	4
3	GENERAL DISCLOSURES.....	5
4	EQUITIES – SHARES & DEPOSITARY RECEIPTS	6
5	DEBT INSTRUMENTS	9
6	INTEREST RATE DERIVATIVES	14
7	CREDIT DERIVATIVES.....	18
8	CURRENCY DERIVATIVES	21
9	STRUCTURED FINANCE INSTRUMENTS	23
10	EQUITY DERIVATIVES	24
11	EXCHANGE TRADED PRODUCTS	26
12	OTHER INSTRUMENTS.....	27
13	SECURITIES FINANCING TRANSACTIONS.....	31

1 Context



This document has been issued by M&G Investment Management Limited ('MAGIM', 'the Firm'). MAGIM is authorised and regulated by the Financial Conduct Authority ('FCA') as a MiFID Investment Firm; the main regulated activity it performs is portfolio management for clients that meet the FCA handbook definition of 'professional client'. As a portfolio manager, we both execute orders directly against an execution venue ('direct execution') and also place orders with other entities, such as a broker or an affiliated dealing desk¹, for onward execution on behalf of our clients ('placement').

As part of Markets in Financial Instruments Directive ("MIFID II"), all Investment Firms are required to publish, on an annual basis, information on the top 5 execution venues used and information on the quality of execution obtained. MIFID II requires this disclosure to be split between two reports; **Regulatory Technical Standard 28 ("RTS 28") and Delegated Regulation Article 65(6)**. Where an Investment Firm has directly executed an order on an execution venue, the order is captured under RTS 28. Where the Investment Firm has placed an order with a broker or an affiliated dealing desk then it is captured in Article 65(6). For the sake of clarity:

- **'Direct Execution (RTS 28)'** occurs where the Investment Firm executes its own decisions to deal based on a request-for-quote from a trading counterparty or executes an order directly against an execution venue: e.g. a regulated market, Multilateral Trading facility (MTF), Organised Trading Facility (OTF), Systematic Internaliser, a market maker or other liquidity provider. Where a trade is executed via a Request-For-Quote (RFQ) trading system that allows firms to identify different liquidity providers the firm may wish to deal with in the transaction, the trading venue itself is identified for the purpose of the top 5 tables rather than the underlying counterparty with whom the transaction was agreed. To provide further transparency and to accurately reflect our venue selection process and order execution policy and behaviour, in such cases we also disclose the identity of the top 5 counterparties we have most commonly executed against, on these trading venues.
- **'Placement (Article 65(6))'** is where the Investment Firm places an order with another entity, such as a broker or an affiliated dealing desk, for it to execute i.e. 'to work and execute in the market'. This is the mode of execution primarily used for Equities and where orders have been routed internally to affiliated dealing desks in other geographical locations, in order to achieve the best possible outcome for clients. Where an affiliated dealing desk appears in the top 5 tables, to provide further transparency we have also disclosed additional information on the identity of the underlying top 5 counterparties, with whom our affiliated dealing desk executed trades.

This document summarises and discloses the top five execution venues in terms of trading volumes where we have executed decisions to deal in the preceding year and associated information on the quality of execution for each class of financial instrument and should be read in conjunction with MAGIM's Execution Policy for Professional Clients (available on our website), which outlines how orders are executed and includes the list of updated counterparties and venues.

¹ The firm may route certain orders internally to dealing desks within the Group in other geographical locations in order to achieve the best possible outcome for its clients. As a result, we have included Group entities within the top 5 tables under Article 65(6) data. For 2020, the relevant Group entities are: M&G Investments (Singapore) Pte Ltd. and M&G Investments (USA) Inc.

2 Overview



MAGIM operates centralised dealing teams, who are responsible for dealing in MiFID financial instruments. The dealing teams conclude transactions with external counterparties in relation to the discretionary investment decisions made by M&G's portfolio management teams. During 2020, MAGIM's dealing teams undertook dealing in the following financial instruments for clients:

- Bonds
- Convertible bonds
- Credit Derivatives – over the counter
- Currency derivatives
- Depositary receipts
- Equities
- Equity swaps and other derivatives
- Exchange traded equity derivatives – futures and options
- Exchange traded funds
- Interest rate derivatives – exchange traded and over the counter
- Money market instruments
- Structured finance e.g. asset backed securities

In addition, MAGIM dealing teams also concluded transactions in Securities Financing Transactions (SFT's) for Bonds and Equities.

Key terms

The following are key terms included in this report along with their definitions as per MiFID II:

- “Execution venues” include regulated markets, multilateral trading facilities, organised trading facilities, systematic internalisers, market makers and other liquidity providers;
- “Passive” is defined as an order entered into the order book that provided liquidity to the market;
- “Aggressive” is defined as an order entered into the order book that took liquidity from the market; and
- “Directed” refers to circumstances when a client specifies the execution venue or trading counterparty prior to the execution of the order.

MAGIM's quantitative reports do not contain information on passive / aggressive orders because the notion of passive / aggressive is understood to only apply where a firm directly executes on execution venues that operate transparent order books i.e. “orders entered into an order book” and this mode of execution does not apply to MAGIM.

3 General Disclosures



RTS28 requires investment firms to publish for each class of financial instrument, a summary of the analysis and conclusions from their detailed monitoring of the quality of execution obtained where they executed all client orders in the previous year. The below are non-instrument specific general disclosures:

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

MAGIM does not have any close links or common ownerships with respect to any execution venues or trading counterparties used by MAGIM's dealing teams for execution. MAGIM's execution policy requires that execution venues and trading counterparties can only be used where they have been approved by our venue / counterparty approval process.

We do place orders with other affiliated entities within the group for execution on behalf of clients where we believe local trading expertise and market knowledge will lead to better execution results in certain asset classes as referenced below.

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

There are no specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received. Additionally, as per our Execution Policy, any remunerations, discounts or non-monetary benefit from routing client orders to a particular execution venue or counterparty are not allowed under our existing Conflicts of Interest, Inducements and Gifts and Hospitality policies.

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

MAGIM only performs regulated activities for professional clients; it does not deal directly with retail clients. However all clients are treated in exactly the same way by MAGIM's independent Dealing Desks in accordance with our Execution Policy.

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.

MAGIM only performs regulated activities for professional clients; it does not deal directly with retail clients.

An explanation of how the investment firm has used output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU

MAGIM did not use the output of a consolidated tape provider as this information is not currently available.

Monitoring & Oversight

An ongoing process of monitoring is in place to enable MAGIM to demonstrate that best execution and appropriate client outcomes are achieved with participation by Front Office Dealing teams, the Controls and Assurance function and the Compliance Monitoring team. Output from this monitoring activity is reported to appropriate Oversight Committees. Further information is provided in our Execution Policy.

4 Equities – Shares & Depositary Receipts

Equity orders have been grouped according to tick size liquidity bands which are in turn based on the average daily number of transactions executed. Non-EEA equities with no tick size data have been included in 'Other Instruments.'

Placement Article 65(6)

Class of Financial Instrument	Equity Cash				
Notification if <1 average trade per business day in the previous year	N				
Top five 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 a percentage of total in that class	Percentage of Passive Orders	Percentage of Aggressive Orders	Percentage of Directed Orders
Tick size Liquidity band 5 and 6 (from 2000 trades per day)					
JP MORGAN SECURITIES PLC K6Q0W1PS1L1O4IQL9C32	9.44%	7.71%	N/A	N/A	N/A
CREDIT SUISSE SECURITIES (EUROPE) DL6FFRRLF74S01HE2M14	9.17%	7.65%	N/A	N/A	N/A
CITIGROUP GLOBAL MARKETS LTD XKZZ2JZF41MRHTR1V493	8.88%	21.71%	N/A	N/A	N/A
LIQUIDNET EUROPE LIMITED 213800ZIRB79BE5XQM68	8.74%	11.52%	N/A	N/A	N/A
COWEN & COMPANY LLC 549300WR155U7DVMIW58	8.70%	4.34%	N/A	N/A	N/A
Tick size liquidity band 3 and 4 (from 80 to 1999 trades per day)					
ATLANTIC EQUITIES LLP 213800327M9B4D9S1553	14.54%	5.36%	N/A	N/A	N/A
CITIGROUP GLOBAL MARKETS LIMITED XKZZ2JZF41MRHTR1V493	11.92%	16.71%	N/A	N/A	N/A
M&G INVESTMENTS (SINGAPORE) PTE 21380025WDEGTPM9NX11	10.01%	3.76%	N/A	N/A	N/A
COWEN & COMPANY LLC 549300WR155U7DVMIW58	5.93%	4.81%	N/A	N/A	N/A
LIQUIDNET EUROPE LIMITED 213800ZIRB79BE5XQM68	5.86%	11.28%	N/A	N/A	N/A
Tick size liquidity band 1 and 2 (from 0 to 79 trades per day)					
M&G INVESTMENTS (SINGAPORE) PTE 21380025WDEGTPM9NX11	62.96%	43.87%	N/A	N/A	N/A
CITIGROUP GLOBAL MARKETS LIMITED XKZZ2JZF41MRHTR1V493	5.67%	12.49%	N/A	N/A	N/A
BMO CAPITAL MARKETS LIMITED L64HM9LHPDOS1B9HJC68	3.58%	1.93%	N/A	N/A	N/A
BTIG LIMITED 213800YZXS7U4QZP6441	3.32%	2.44%	N/A	N/A	N/A
ATLANTIC EQUITIES LLP 213800327M9B4D9S1553	2.86%	2.43%	N/A	N/A	N/A

Additional Counterparty Disclosures



Where an affiliated dealing desk appears in the top 5 tables, to provide further transparency we have also disclosed additional information on the identity of the underlying top 5 counterparties with whom our affiliated dealing desk executed trades:

Orders executed on M&G INVESTMENTS (SINGAPORE) PTE LTD	Equity Cash – tick size liquidity band 3 and 4
Top five counterparties ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class
INSTINET SINGAPORE SERVICES PRIVATE 5493008VVCV0WOYJD2O16	27.26%
MORGAN STANLEY & CO INTERNATIONAL 4PQUHN3JPFGFNF3BB653	16.71%
GOLDMAN SACHS INTERNATIONAL W22LROWP2IHZNBB6K528	15.69%
JEFFERIES INTERNATIONAL LTD S5THZMDUJCTQZBTRVI98	10.54%
JP MORGAN SECURITIES PLC K6QOW1PS1L1O4IQL9C32	9.84%

Orders executed on M&G INVESTMENTS (SINGAPORE) PTE LTD	Equity Cash – tick size liquidity band 1 and 2
Top five counterparties ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class
INSTINET SINGAPORE SERVICES PRIVATE 5493008VVCV0WOYJD2O16	28.08%
MORGAN STANLEY & CO INTERNATIONAL 4PQUHN3JPFGFNF3BB653	20.03%
GOLDMAN SACHS INTERNATIONAL W22LROWP2IHZNBB6K528	10.77%
JP MORGAN SECURITIES PLC K6QOW1PS1L1O4IQL9C32	10.62%
JEFFERIES INTERNATIONAL LTD S5THZMDUJCTQZBTRVI98	7.87%

Execution Quality Report



In January 2020 an affiliated dealing desk was set up by M&G in Singapore to execute equity related products. The majority of Asian equity orders are now placed with this desk for execution. Where appropriate their top 5 counterparties have been identified in the additional counterparty disclosure tables.

During 2020 we saw a significant increase in volatility and volumes in the equity markets, M&G responded with a smooth transition to a working from home (“WFH”) environment with no impact to Best Execution policies and procedures.

We continue to see a mixture of execution methods in our top five counterparties where we use cash, algorithmic and programme trading tools. The year-on-year changes reflect the relative change weightings for these respective methods, the geographic mix of markets and the availability of counterparties. The addition of our affiliated dealing desk in Singapore has had the biggest impact on the brokers in this list. The continued level of service with the transition to WFH was also an impact on the year-on-year changes. It is worth highlighting that in addition to the counterparties listed above, the

Dealing Desk relies on many more counterparties representing more than half of these tick bands turnover to achieve best execution.

On receipt of an order the dealer will determine the objectives of the fund manager for the order. The size of the order and current market liquidity and conditions will be assessed and a strategy will be decided upon. The main execution factors of price, costs, speed, likelihood of execution will be taken into account and the dealer will decide how to execute, which could include crossing networks, brokers algorithmic tools 'low touch', 'high touch' to source a brokers liquidity and market knowledge or added to a list of other orders to trade as a basket to reduce execution costs.

The dealing desk uses an external Transaction Cost Analysis (TCA) provider to provide data to analyse equity trading. This data is used on a daily, weekly and monthly basis to review performance. The Transaction Equity Review Forum meets monthly to measure the implicit and explicit costs, performance of the dealers, brokers, algorithmic strategies and market venues used by the brokers. Trends in performance will be monitored and any outliers will be investigated further. Findings and recommendations are then presented to the Dealing Management Committee for review of all dealing activity.

The list of counterparties is monitored continuously to ensure that the firm has the necessary coverage and choice to ensure best execution in developed and emerging markets whether trading in small, mid or large cap companies. The algorithmic brokers are chosen for their capability and venue connection by region and are monitored for usage and performance. Meetings are held with the algorithmic brokers at least annually to provide training, discuss market structure and any relevant changes to algorithmic strategies or the smart order router. Brokers may be removed due to a decline in service and or performance.

5 Debt Instruments

Regulatory Technical Standard 28

Class of Financial Instrument	Debt Instruments: Bonds				
Notification if <1 average trade per business day in the previous year	N				
Top five 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 a percentage of total in that class	Percentage of Passive Orders	Percentage of Aggressive Orders	Percentage of Directed Orders
TRADEWEB TREU	56.92%	35.69%	N/A	N/A	N/A
TSOX BMTF	35.25%	42.41%	N/A	N/A	N/A
MARKETAXESS MAEL	5.42%	17.11%	N/A	N/A	N/A
BARCLAYS BANK PLC G5GSEF7VJP5I7OUK5573	0.31%	0.24%	N/A	N/A	N/A
CITIGROUP GLOBAL MARKETS LTD XKZZ2JZF41MRHTR1V493	0.24%	0.39%	N/A	N/A	N/A

Additional Counterparty Disclosures



To provide further transparency and to accurately reflect our venue selection process and order execution policy and behaviour, where an RFQ system appears in the top 5 table, we also disclose the identity of the top 5 counterparties we have most commonly executed against, on these trading venues:

Orders executed on TRADEWEB	Bonds
Top five counterparties ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class
CITIGROUP GLOBAL MARKETS LIMITED XKZZ2JZF41MRHTR1V493	15.32%
UBS AG LONDON BRANCH BFM8T61CT2L1QCEMIK50	9.78%
MORGAN STANLEY & CO INTERNATIONAL 4PQUHN3JPFQFNF3BB653	9.01%
GOLDMAN SACHS INTERNATIONAL W22LROWP2IHZNBB6K528	7.60%
MERRILL LYNCH INTERNATIONAL GGDZP1UYGU9STUHRDP48	7.56%

Orders executed on TSOX	Bonds
Top five counterparties ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class
CITIGROUP GLOBAL MARKETS LIMITED XKZZ2JZF41MRHTR1V493	14.73%
MORGAN STANLEY & CO INTERNATIONAL 4PQUHN3JPFQFNF3BB653	12.78%
HSBC BANK PLC MP6I5ZYBUE3UXPYFY54	11.04%
GOLDMAN SACHS INTERNATIONAL W22LROWP2IHZNBB6K528	9.37%
JP MORGAN SECURITIES PLC K6Q0W1PS1L1O4IQL9C32	8.84%

Orders executed on MARKETAXESS	Bonds
Top five counterparties ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class
MARKETAXESS CAPITAL LIMITED 529900CTXON8S5AOCB70	29.21%
JP MORGAN SECURITIES PLC K6Q0W1PS1L1O4IQL9C32	6.82%
HSBC BANK PLC MP6I5ZYBUE3UXPYFY54	5.80%
GOLDMAN SACHS INTERNATIONAL W22LROWP2IHZNBB6K528	5.14%
MORGAN STANLEY & CO INTERNATIONAL 4PQUHN3JPFQFNF3BB653	4.64%

Placement Article 65(6)

Class of Financial Instrument	Debt Instruments: Bonds				
Notification if <1 average trade per business day in the previous year	N				
Top five 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 a percentage of total in that class	Percentage of Passive Orders	Percentage of Aggressive Orders	Percentage of Directed Orders
MGUS 254900F3KD7CHPVGJC43	100%	100%	N/A	N/A	N/A

Additional Counterparty Disclosures



Where an affiliated dealing desk appears in the top 5 tables, to provide further transparency we have also disclosed additional information on the identity of the underlying top 5 counterparties with whom our affiliated dealing desk executed trades:

Orders executed through MGUS		Bonds
Top five counterparties ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	
JP MORGAN SECURITIES LLC ZBUT11V806EZRVTWT807	16.21%	
GOLDMAN SACHS & CO LLC FOR8UP27PHTHYVLBNG30	13.39%	
WELLS FARGO SECURITIES LLC VYVVCKR63DVZZN70PB21	12.34%	
CREDIT SUISSE SECURITIES (USA) LLC 1V8Y6QCX6YMJ2OELI46	10.04%	
MARKETAXESS CORPORATION GPSMMRI21JE7ZCVYF972	9.75%	

Regulatory Technical Standard 28

Class of Financial Instrument	Debt Instruments: Money Market Instruments				
Notification if <1 average trade per business day in the previous year	N				
Top five 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 a percentage of total in that class	Percentage of Passive Orders	Percentage of Aggressive Orders	Percentage of Directed Orders
TSOX BMTF	47.77%	51.36%	N/A	N/A	N/A
TRADEWEB TREU	42.73%	40.71%	N/A	N/A	N/A
WELLS FARGO SECURITIES INTL BWS7DNS2Z4NPKPNYKL75	3.17%	2.30%	N/A	N/A	N/A
BARCLAYS BANK PLC G5GSEF7VJP5I7OUK5573	2.83%	1.88%	N/A	N/A	N/A
NATWEST MARKETS PLC RR3QWICWWIPCS8A4S074	0.91%	0.84%	N/A	N/A	N/A

Additional Counterparty Disclosures



To provide further transparency and to accurately reflect our venue selection process and order execution policy and behaviour, where an RFQ system appears in the top 5 table, we also disclose the identity of the top 5 counterparties we have most commonly executed against, on these trading venues:

Orders executed on TSOX	Money Market Instruments
Top five counterparties ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class
WELLS FARGO SECURITIES INTERNATIONAL BWS7DNS2Z4NPKPNYKL75	44.47%
BARCLAYS BANK PLC G5GSEF7VJP5I7OUK5573	19.37%
CITIGROUP GLOBAL MARKETS LIMITED XKZZ2JZF41MRHTR1V493	10.15%
TORONTO DOMINION BANK PT3QB789TSUIDF371261	5.60%
HSBC BANK PLC MP6I5ZYZBEU3UXPYFY54	4.53%

Orders executed on TRADEWEB	Money Market Instruments
Top five counterparties ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class
TORONTO DOMINION BANK PT3QB789TSUIDF371261	20.65%
DANSKE BANK A/S MAES062Z21O4RZ2U7M96	16.46%
NATWEST MARKETS PLC RR3QWICWWIPCS8A4S074	14.61%
DEUTSCHE BANK AG 7LTFWZYICNSX8D621K86	6.59%
BARCLAYS BANK PLC G5GSEF7VJP5I7OUK5573	6.25%

Execution Quality Report



During 2020 an affiliated dealing desk in the US was set up which in its infancy contributes towards to <1% of total FIDD volumes/asset classes as a proportion of overall executions / tickets. However it is our sole placement mechanism and therefore included in Article 65(6) for Debt Instruments – Bonds.

The trading year witnessed increased volatility and volumes in the Fixed Income markets, M&G responded with a smooth transition to a working from home environment with no impact to Best Execution policies and procedures.

The vast majority of bond executions are executed with counterparties via MTF venues, to access broad range of liquidity providers and for assistance with transaction reporting being a benefit. MarketAxess Capital Limited volumes remain high due to various trading protocols including interfund transfer execution and open trading which enables the desk access to a deeper liquidity pool. Tradeweb remains the venue with the largest liquidity in the rates market and government bond volumes continue to account for a significant percentage of our turnover. MarketAxess provides the best liquidity in USD

Investment Grade, High Yield and Global Emerging Markets. MarketAxess volumes have vastly increased due to the new protocols of interfund transfer execution and open trading which enable us to access a deeper liquidity pool previously unavailable.

When reviewing the quality of execution, the desk will consider a number of factors to assess trends and relative performance. Typically, price, size and costs including explicit and implicit. In general, the price will be the most important execution factor when sourcing liquidity and considering best execution, but there are a number of other internal and external considerations made when deciding where and how to approach each order to achieve the best execution. Where size, likelihood of execution, strategy or market specific considerations are more sensitive to achieving the best execution, then dealers will consider executing off trading venue's and negotiating directly with counterparties, relying on expertise in the market, axe information and minimising the information leakage which may affect achieving the best price. These executions are often process traded through a venue for reporting and confirming the specific details of the trade. Bloomberg TSOX captures the majority of the process trading volume and is an efficient venue across all asset classes.

Money Markets are visibly liquid assets; therefore price is usually the most important execution factor. The majority of these products are executed via Tradeweb and TSOX for speed and depth of liquidity, with other axed counterparties facilitating executions outside of the main G10 currencies.

MAGIM reviews its list of execution venues at least annually to ensure it is able, on a consistent basis, to obtain the best possible results when executing orders on behalf of clients. All additions to execution venues and counterparties are approved via our Counterparty Approval processes as outlined in our Execution Policy. Performance of counterparties is continually monitored and more formally in our quarterly Trading and Execution Review Forum. Hit ratios, volumes across all markets, venues and response rates are assessed across all counterparties and tracked on a rolling quarterly basis. Transaction cost analysis is also monitored regularly using a third-party tool, and reported to our Dealing Management Committee. Appropriate action such as removing or reducing use of venues and counterparties for reasons such as under-performance may be taken from ongoing reviews. This continual analysis and monitoring undertaken ensures we are achieving the best possible outcome for the client and are comfortable with the venues and brokers that we are using to achieve best execution.

MAGIM continues to look at data issued by execution venues under RTS27 to look for opportunities to improve transparency around quality of execution, but does not consider the data to provide any additional meaningful information at present.

6 Interest Rate Derivatives

Regulatory Technical Standard 28

Class of Financial Instrument	Interest Rate Derivatives : Futures & Options				
Notification if <1 average trade per business day in the previous year	N				
Top five 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 a percentage of total in that class	Percentage of Passive Orders	Percentage of Aggressive Orders	Percentage of Directed Orders
CITIGROUP GLOBAL MARKETS LTD XKZZ2JZF41MRHTR1V493	42.88%	30.14%	N/A	N/A	N/A
E D & F MAN CAPITAL MARKETS GKS4XBH2YSEYMX83N473	36.28%	45.95%	N/A	N/A	N/A
UBS AG LONDON BRANCH BFM8T61CT2L1QCCEMIK50	19.22%	18.81%	N/A	N/A	N/A
MORGAN STANLEY & CO INTL 4PQUHN3JPFQFNF3BB653	0.78%	1.68%	N/A	N/A	N/A
MERRILL LYNCH INTERNATIONAL GGDZP1UYGU9STUHRDP48	0.55%	2.04%	N/A	N/A	N/A

Placement Article 65(6)

Class of Financial Instrument	Interest Rate Derivatives : Futures & Options				
Notification if <1 average trade per business day in the previous year	N				
Top five 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 a percentage of total in that class	Percentage of Passive Orders	Percentage of Aggressive Orders	Percentage of Directed Orders
MGUS 254900F3KD7CHPVGJC43	100%	100%	N/A	N/A	N/A

Additional Counterparty Disclosures



Where an affiliated dealing desk appears in the top 5 tables, to provide further transparency we have also disclosed additional information on the identity of the underlying top 5 counterparties with whom our affiliated dealing desk executed trades:

Orders executed on MGUS	Futures & Options
Top five counterparties ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class
BANK OF AMERICA SECURITIES INC 549300HN4UKV1E2R3U73	79.67%
JP MORGAN SECURITIES LLC ZBUT11V806EZRVWT807	11.76%
UBS SECURITIES LLC T6FIZBDPKLYJKFCRVK44	3.82%
GOLDMAN SACHS & CO LLC FOR8UP27PHTHYVLBNG30	3.15%
MORGAN STANLEY & CO LLC 9R7GPTSO7KV3UQJZQ078	1.59%

Regulatory Technical Standard 28

Class of Financial Instrument	Interest Rate Derivatives : Swaps & Other Derivatives				
Notification if <1 average trade per business day in the previous year	N				
Top five 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 a percentage of total in that class	Percentage of Passive Orders	Percentage of Aggressive Orders	Percentage of Directed Orders
TRADEWEB TREU	65.84%	35.07%	N/A	N/A	N/A
LLOYDS BANK CORPORATE MARKETS 213800MBWEIJD5CU638	7.83%	9.24%	N/A	N/A	N/A
BARCLAYS BANK PLC G5GSEF7VJP5I7OUK5573	7.25%	8.06%	N/A	N/A	N/A
UBS AG LONDON BRANCH BFM8T61CT2L1QCCEMIK50	6.49%	9.48%	N/A	N/A	N/A
CITIGROUP GLOBAL MARKETS LTD XKZZ2JZF41MRHTR1V493	4.30%	4.98%	N/A	N/A	N/A

Additional Counterparty Disclosures



To provide further transparency and to accurately reflect our venue selection process and order execution policy and behaviour, where an RFQ system appears in the top 5 table, we also disclose the identity of the top 5 counterparties we have most commonly executed against, on these trading venues:

Orders executed on TRADEWEB	Swaps & Other Derivatives
Top five counterparties ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class
NATWEST MARKETS PLC RR3QWICWWIPCS8A4S074	30.76%
UBS AG LONDON BRANCH BFM8T61CT2L1QCCEMIK50	17.43%
HSBC BANK PLC MP6I5ZYZBEU3UXPYFY54	8.46%
LLOYDS BANK CORPORATE MARKETS PLC 213800MBWEIJDM5CU638	8.45%
CITIGROUP GLOBAL MARKETS LIMITED XKZZ2JZF41MRHTR1V493	5.63%

Execution Quality Report



MAGIM execute a significant percentage of Interest Rate Derivative orders electronically via the multibank execution venue, Tradeweb Multilateral Trading Facility (Tradeweb MTF). Tradeweb provides two alternative methods of concluding transactions for its users. The first method facilitates an efficient means of execution by allowing firms to source real time, competitive liquidity via what is commonly referred to as a Request for Streaming (RFS) or a Request for Quote (RFQ) process. Both RFS and RFQ allow firms to identify and select the different liquidity providers they may wish to deal with in the transaction and therefore source direct pricing. The second method where users negotiate and agree a price for a transaction outside of the system (e.g. on the telephone) and subsequently confirm, process and conclude the details on Tradeweb MTF. In this method the transaction is carried out under the rules of the trading venue and therefore considered to be executed on the trading venue.

MAGIM also executes Interest Rate Swaps directly with Banks, known as bilateral execution. Bilateral execution compliments the Tradeweb MTF method of order execution and remains a crucial part of ensuring all sufficient steps are taken to ensure the best possible results for clients when executing orders. Due to the nature of arrangements involved in IRS it is important both sides of transactions have a clear understanding on their legal status and obligations at all times. The International Swaps and Derivatives Association Master Agreement (ISDA) is the standard industry legal agreements for parties entering IRS and MAGIM require this to be in place with a counterparty prior to concluding any IRS.

Under normal market conditions and when financial markets are considered to be liquid MAGIM determines price to be the most important execution factor. Therefore, under all methods of execution we will source multiple prices from different counterparties to ensure orders are transacted at the most competitive levels. Dealers ensure the full range of counterparties is used over the course of business and as highlighted below; the list of available counterparties is regularly reviewed. Typically, price will be followed by order size and the nature of order respectively in terms of the most important execution factors. However, many considerations such as time of day, event risk, currency, market volatility, and transaction type to name a few may individually or collectively influence market liquidity at any time and therefore Dealer judgement will be required to determine if the order of execution factors remain appropriate. For example for certain derivative transactions, it may be preferable although not essential, to unwind trades with the existing counterparty who should in theory provide operational efficiency as well as competitive pricing to do so. Occasionally, Dealers may consider some orders to be too large for

the liquidity in the market and if not executed appropriately could create adverse market movements which in turn may negatively impact the customer. In such circumstance the order size would be our first execution factor consideration.

The Swaps & Other Derivatives table includes the contribution of Total Return Swaps. These are typically short term but are often significant in size and therefore have a meaningful impact on the table. They are priced and executed on a bilateral basis with dealers ensuring a minimum of three execution venues are sourced for liquidity.

Futures remain consistent with use of execution brokers that have access to deep liquidity. E D & F Man now feature as they have grown their coverage. Other than liquidity access and depth of market knowledge, clearing broker setup remains a factor with order routing and execution.

A formal Transaction Execution Review Forum (TERF) is in place with quantitative and qualitative review on order execution outcomes, review methodology and benchmarks and look for ways to continuously improve execution arrangements. The output from the TERF is used to help review the list of execution venues to ensure MAGIM is able, on a consistent basis, to obtain the best possible results when executing orders on behalf of clients.

Any new additions to the list of execution venues and counterparties are approved via the counterparty approval process as outlined in the MAGIM Execution Policy. During the calendar year 2020 there were no notable changes to the panel of execution venues available for transactions in Interest rate derivatives.

MAGIM continue to examine data published by execution venues under RTS27 to look for opportunities to further improve transparency around quality of execution with respect to Interest Rate Derivatives. In the absence of consolidated common provider it is not felt the data currently provides an efficient and meaningful method of analysis to complement our existing detailed execution monitoring and analysis.

7 Credit Derivatives

Regulatory Technical Standard 28

Class Of Financial Instrument	Credit Derivatives : Swaps & Other Credit Derivatives				
Notification if <1 average trade per business day in the previous year	N				
Top five 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 a percentage of total in that class	Percentage of Passive Orders	Percentage of Aggressive Orders	Percentage of Directed Orders
TRADEWEB TREU	92.29%	89.81%	N/A	N/A	N/A
BARCLAYS BANK PLC G5GSEF7VJP5I7OUK5573	6.11%	5.48%	N/A	N/A	N/A
JP MORGAN SECURITIES PLC K6Q0W1PS1L1O4IQL9C32	0.75%	2.43%	N/A	N/A	N/A
CITIGROUP GLOBAL MARKETS LTD XKZZ2JZF41MRHTR1V493	0.28%	0.38%	N/A	N/A	N/A
GOLDMAN SACHS INTERNATIONAL W22LROWP2IHZNBB6K528	0.28%	1.44%	N/A	N/A	N/A

Additional Counterparty Disclosures



To provide further transparency and to accurately reflect our venue selection process and order execution policy and behaviour, where an RFQ system appears in the top 5 table, we also disclose the identity of the top 5 counterparties we have most commonly executed against, on these trading venues:

Orders executed on TRADEWEB	Swaps & Other Credit Derivatives
Top five counterparties ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class
JP MORGAN SECURITIES PLC K6Q0W1PS1L1O4IQL9C32	36.47%
GOLDMAN SACHS INTERNATIONAL W22LROWP2IHZNBB6K528	25.06%
BNP PARIBAS R0MUWSFPU8MPRO8K5P83	20.76%
MERRILL LYNCH INTERNATIONAL GGDZP1UYGU9STUHRDP48	6.99%
CITIGROUP GLOBAL MARKETS LIMITED XKZZ2JZF41MRHTR1V493	6.58%

Regulatory Technical Standard 28

Class Of Financial Instrument	Credit Derivatives : Credit Option				
Notification if <1 average trade per business day in the previous year	Y				
Top five 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 a percentage of total in that class	Percentage of Passive Orders	Percentage of Aggressive Orders	Percentage of Directed Orders
MERRILL LYNCH INTERNATIONAL GGDZP1UYGU9STUHRDP48	57.52%	44.44%	N/A	N/A	N/A
BARCLAYS BANK PLC G5GSEF7VJP5I7OUK5573	39.82%	50.00%	N/A	N/A	N/A
JP MORGAN SECURITIES PLC K6QOW1PS1L1O4IQL9C32	2.65%	5.56%	N/A	N/A	N/A

Execution Quality Report



The Credit Derivatives market is typically liquid in nature. MAGIM make a distinction between Single Name and Credit Indices (E.G iTraxx and CDX) when making assessments of the quality of execution. In normal market conditions for Single Name Credit Derivatives, price will be the most important execution factor typically followed by order size and execution/settlement respectively due to non-mandatory clearing for the asset type.

For Credit indices, execution/settlement will be the most important execution factor due to clearing capabilities and mandatory clearing rules. This is typically followed by price and order size as the clearing factor may impact the price and liquidity is stronger in Index, therefore is a first consideration. Other Execution Factors including cost and speed of execution may also be considered on a case by case basis but in normal market conditions are unlikely to be prioritised over the above execution factors.

When trading Credit Indices, MAGIM execute a significant amount of orders electronically via the multibank price platform, Tradeweb Multilateral Trading Facility (Tradeweb MTF). Tradeweb MTF facilitates an efficient method of execution by sourcing real time, competitive liquidity. For larger orders or those where liquidity may be limited it may not always be practical to execute via Tradeweb MTF. On such occasions the size and nature of the order may take priority, this may be to avoid any potential adverse market impact that may negatively impact the customer, for example, splitting large order tickets and leaving orders with reputable brokers to work for the best price over a longer period of time.

Credit Options are traded OTC with price and execution/settlement as the most important execution factors. The instruments are mainly used for fund hedging, options are often traded as a package closing out a current option close to expiry and resetting the hedge. MAGIM reviews its list of execution venues at least annually to ensure it is able, on a consistent basis, to obtain the best possible results when executing orders on behalf of clients. All additions to execution venues and counterparties are approved via our Counterparty Approval processes as outlined in our Execution Policy. Performance of counterparties for credit derivatives is continually monitored and more formally in our quarterly Trading and Execution Review Forum. Hit ratios, volumes and trade sizes are assessed across all counterparties and tracked on a rolling quarterly basis. ISDA and CSA agreements for particular funds, will also govern prices obtained and counterparty usage and are reviewed periodically. Transaction cost analysis is not used for Credit Derivatives, instead the dealers will use the volumes information and tracked

competitive pricing data, with identified contract type expertise for OTC credit swaps when requesting quotes, and will route all cleared swaps through Tradeweb executing on a best price basis. This continual analysis and monitoring undertaken ensures we are achieving the best possible outcome for the client and are comfortable with the venues and brokers that we are using to achieve best execution. There were no other notable changes to counterparties during 2020.

8 Currency Derivatives

Regulatory Technical Standard 28

Class Of Financial Instrument		Currency Derivatives : Swaps, forwards, & other currency derivatives			
Notification if <1 average trade per business day in the previous year	N				
Top five 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 a percentage of total in that class	Percentage of Passive Orders	Percentage of Aggressive Orders	Percentage of Directed Orders
FX CONNECT MFXR	99.90%	99.78%	N/A	N/A	0.67%
LLOYDS BANK CORPORATE MARKETS 213800MBWEIJD5CU638	0.07%	0.13%	N/A	N/A	100%
UBS AG BFM8T61CT2L1QCCEMIK50	0.02%	0.01%	N/A	N/A	N/A

Additional Counterparty Disclosures



To provide further transparency and to accurately reflect our venue selection process and order execution policy and behaviour, where an RFQ system appears in the top 5 table, we also disclose the identity of the top 5 counterparties we have most commonly executed against, on these trading venues:

Orders executed on FX CONNECT	Swaps, forwards, & other currency derivatives
Top five counterparties ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class
STATE STREET BANK AND TRUST COMPANY 571474TGEMMWANRLN572	33.91%
HSBC BANK PLC MP6I5ZYZBEU3UXPYFY54	14.07%
JP MORGAN SECURITIES PLC K6Q0W1PS1L1O4IQL9C32	12.27%
UBS AG BFM8T61CT2L1QCCEMIK50	10.75%
BARCLAYS BANK PLC G5GSEF7VJP517OUK5573	5.60%

Execution Quality Report



MAGIM execute the majority of currency derivative orders electronically via, FX Connect Multilateral Trading Facility (FXC MTF). FXC MTF is operated by State Street Global Markets International Limited and provides two alternative methods of concluding transactions for its members. The first method facilitates an efficient means of execution by allowing firms to source real time, liquidity via what is commonly referred to as a Request for Streaming (RFS) or a Request for Quote (RFQ) process. Both RFS and RFQ allow firms to identify and select the different liquidity providers they may wish to deal with in the transaction and therefore source direct bespoke pricing. The second method, known as Allocation, is where members negotiate and agree a price for a transaction outside of the system (e.g. on the telephone) and subsequently confirm, process and conclude the details on FXC MTF. In the case of the latter method

the transaction is carried out under the rules of the trading venue and therefore considered to be executed 'on' the trading venue. In Q4 2020 MAGIM added an additional electronic trading platform to the suite of currency derivative execution Venues, 360T. 360T is owned and operated by the Deutsche Borse Group and will further enhance the operational effectiveness and efficiency of the dealing operation.

MAGIM takes all sufficient steps to obtain the best possible results for its clients when executing client orders. Consequently, under normal market conditions and when currency derivative markets are considered to be liquid, MAGIM determines price to be the most important execution factor. Therefore, under all methods of execution (RFS, RFQ & Allocation) we will source multiple prices from different execution venues and/or counterparties to ensure orders are transacted at the best price. Dealers ensure the full range of execution venues/counterparties are used over the course of business and as highlighted below, the list of available venues/counterparties is regularly reviewed. Typically, price will be followed by order size and the nature of order respectively in terms of the most important execution factors. However, many considerations such as time of day, event risk, currency pair, restrictive currency regimes may individually or collectively influence market liquidity at any time and therefore Dealer judgement will be required to determine if the order of execution factors remain appropriate. Occasionally, market orders may be considered too large for the available liquidity and if not executed appropriately could create adverse market movement that may negatively impact the customer. In such circumstances the order size would become our first execution factor consideration. Our Execution policy provides further information on our approach to the importance of the execution factors. During 2020 there were occasions when market volatility was particularly high due to risk events such as BREXIT and the COVID Pandemic. With respect to Currency Derivatives, MAGIM consistently ensured best execution standards were met at all times and did not deviate from the best execution approach as outlined in the MAGIM Execution Policy. Regular "working from home" was successfully and efficiently integrated into the operating model ensuring continued access to liquidity at all times. This did not disrupt the level of service provided to our clients.

As indicated in the quantitative table orders may be considered "Directed Orders". This means an order where a specific execution venue was specified by the client prior to its execution. On occasions, the nature of the trading arrangements with a customer may require execution with a specific venue.

A quarterly Transaction Execution Review Forum (TERF) is in place to review order execution outcomes, review methodology and benchmarks and look for ways to continuously improve execution arrangements. The output from the TERF is used to help review the list of execution venues to ensure MAGIM is able, on a consistent basis, to obtain the best possible results when executing orders on behalf of clients. Any new additions to the list of execution venues and counterparties are approved via the counterparty approval process as outlined in the MAGIM Execution Policy. As mentioned, the electronic trading platform 360T was included as an additional Trading Venue during 2020. Aside from 360T there were no notable additions or removals for the panel of execution venues available for transactions in currency derivatives. Transactional Cost Analysis (TCA) is used to provide data analysis for both pre and post trade scenarios. The TCA is an independent analysis that helps to determine if trades have been executed at favourable prices by facilitating detailed review on many aspects of client orders by isolating data such as order size, currency pairs and trade date and comparing to independent benchmarks.

MAGIM is fully committed and signed up to the FX Global code and is listed on the Global Index of Public Registers. The code sets out globally recognised principles of good practice in the wholesale foreign exchange market. It is designed to promote a robust, fair, liquid, open and appropriately transparent market, to help build and maintain market confidence, and in turn, to improve market functioning.

9 Structured Finance Instruments

Regulatory Technical Standard 28

Class Of Financial Instrument	Structured Finance				
Notification if <1 average trade per business day in the previous year	N				
Top five 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 a percentage of total in that class	Percentage of Passive Orders	Percentage of Aggressive Orders	Percentage of Directed Orders
MORGAN STANLEY & CO INTL 4PQUHN3JPFGNF3BB653	12.69%	12.96%	N/A	N/A	N/A
GOLDMAN SACHS INTL W22LROWP2IHZNBB6K528	11.42%	8.93%	N/A	N/A	N/A
HSBC BANK PLC MP6I5ZYZBEU3UXPYFY54	8.33%	6.19%	N/A	N/A	N/A
BARCLAYS BANK PLC G5GSEF7VJP5I7OUK5573	7.21%	8.90%	N/A	N/A	N/A
JP MORGAN SECURITIES PLC K6Q0W1PS1L1O4IQL9C32	6.52%	5.84%	N/A	N/A	N/A

Execution Quality Report



When reviewing the quality of execution, the desk will consider a number of factors to assess trends and relative performance. Typically, price, size and costs including explicit and implicit. For structured products, liquidity can be challenging to source and pricing transparency less available. This is why all Structured Products are traded OTC and due to their complex cash flows are not a multilateral trading facility. Quotes are sourced on an RFQ basis with brokers who are making markets in the instruments we want to trade. Using historic volumes data, reviewing the hit ratios of brokers in the trading execution review forum and assessing broker expertise in structured deals, particularly for primary market transactions, dealers will direct their RFQ's to appropriate counterparties to avoid information leakage, increase the likelihood of execution and achieve the best possible outcome for the client. Regular engagement with a variety of counterparties help the dealers understand where to look for liquidity, for what types of deals and at what time, to achieve the best price.

MAGIM reviews its list of counterparties at least annually to ensure it is able, on a consistent basis, to obtain the best possible results when executing orders on behalf of clients. All additions to execution venues and counterparties are approved via our Counterparty Approval processes as outlined in our Execution Policy. Performance of counterparties are continually monitored and assessed on a periodic basis and some of them may be removed for reasons such as under-performance. There were no notable changes during 2020.

10 Equity Derivatives

Placement Article 65(6)

Class Of Financial Instrument	Equity Derivatives : Options & Futures admitted to trading on a trading venue				
Notification if <1 average trade per business day in the previous year	N				
Top five 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 a percentage of total in that class	Percentage of Passive Orders	Percentage of Aggressive Orders	Percentage of Directed Orders
M&G INVESTMENTS (SINGAPORE) PTE 21380025WDEGTPM9NX11	40.10%	28.54%	N/A	N/A	N/A
GOLDMAN SACHS INTL W22LROWP2IHZNBB6K528	39.94%	31.94%	N/A	N/A	N/A
UBS AG LONDON BRANCH BFM8T61CT2L1QCCEMIK50	14.65%	31.56%	N/A	N/A	N/A
BANK OF AMERICA EUROPE DAC GGDZP1UYGU9STUHRDP48	4.26%	3.50%	N/A	N/A	N/A
JP MORGAN SECURITIES PLC K6Q0W1PS1L1O4IQL9C32	0.74%	2.47%	N/A	N/A	N/A

Additional Counterparty Disclosures



Where an affiliated dealing desk appears in the top 5 tables, to provide further transparency we have also disclosed additional information on the identity of the underlying top 5 counterparties with whom our affiliated dealing desk executed trades:

Orders executed on M&G INVESTMENTS (SINGAPORE) PTE LTD	Equity Derivatives : Options & Futures
Top five counterparties ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class
UBS AG LONDON BRANCH BFM8T61CT2L1QCCEMIK50	49.35%
GOLDMAN SACHS INTERNATIONAL W22LROWP2IHZNBB6K528	27.08%
BANK OF AMERICA EUROPE DAC GGDZP1UYGU9STUHRDP48	20.81%
NATWEST MARKETS PLC RR3QWICWWIPCS8A4S074	1.75%
JP MORGAN SECURITIES PLC K6Q0W1PS1L1O4IQL9C32	1.00%

Regulatory Technical Standard 28

Class Of Financial Instrument	Equity Derivatives : Swaps & Other Derivatives				
Notification if <1 average trade per business day in the previous year	Y				
Top five 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 a percentage of total in that class	Percentage of Passive Orders	Percentage of Aggressive Orders	Percentage of Directed Orders
MORGAN STANLEY INTL 4PQUHN3JPFGFNF3BB653	70.48%	61.90%	N/A	N/A	N/A
JP MORGAN SECURITIES PLC K6QOW1PS1L1O4IQL9C32	9.99%	14.29%	N/A	N/A	N/A
HSBC BANK PLC MP615ZYZBEU3UXPYFY54	9.24%	14.29%	N/A	N/A	N/A
BARCLAYS BANK PLC G5GSEF7VJP517OUK5573	5.08%	1.59%	N/A	N/A	N/A
DEUTSCHE BANK AG 7LTFWZYICNSX8D621K86	5.08%	1.59%	N/A	N/A	N/A

Execution Quality Report



The vast majority of executions are in listed index futures rather than options and given the characteristics of the market including single venue execution venues leads to a concentrated list. This is also subject to influence from the requirement to trade certain contracts with the funds clearer. During 2020 NatWest Markets ceased to be a clearer for a number of funds and were replaced by JP Morgan Securities.

Normally, on receipt of an order the dealer will determine the objectives of the fund manager for the order. The size of the order and current market liquidity and condition will be assessed and a strategy will be decided upon. The main execution factors of price, speed and likelihood of execution will be taken into account.

The addition of our affiliated dealing desk in 2020 led to the biggest impact in the top five placement venues on a year-on-year basis in equity derivatives.

The dealing desk uses an external TCA provider to provide data to analyse Index Future trading. This data is used on a monthly basis to review performance. The Transaction Equity Review Forum meets monthly to measure the implicit and explicit costs, performance of the dealers and brokers. Trends in performance will be monitored and any outliers will be investigated further. This is then fed into the Dealing Management Committee for review of all dealing activity.

With respect to Swaps and Other Derivatives this 2020 disclosure includes additional trading volumes by comparison to previous years. The orders relate to an equity hedging strategy for a client. Execution is always done on a competitive basis with price discovery being subject to our own internal monitoring and oversight designed to ensure transparency and that outcomes are always in the best interest of our clients. Orders are carried out on a bilateral basis.

The list of brokers is monitored continuously to ensure that the firm has the necessary coverage and choice to ensure best execution.

11 Exchange Traded Products

Regulatory Technical Standard 28

Class Of Financial Instrument	Exchange Traded Products (ETFs)				
Notification if <1 average trade per business day in the previous year	N				
Top five 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 a percentage of total in that class	Percentage of Passive Orders	Percentage of Aggressive Orders	Percentage of Directed Orders
JANE STREET FINANCIAL LIMITED 549300ZHEHX8M31RP142	49.48%	37.89%	N/A	N/A	N/A
FLOW TRADERS B.V. 549300CLJI9XDH12XV51	31.98%	31.23%	N/A	N/A	N/A
VIRTU ITG EUROPE LIMITED 213800EEC95PRUCEUP63	7.79%	12.51%	N/A	N/A	N/A
GOLDMAN SACHS INTL W22LROWP2IHZNBB6K528	4.98%	5.15%	N/A	N/A	N/A
INVESTEK BANK PLC 8450VF8TSMHOT6D4K848	1.94%	4.56%	N/A	N/A	N/A

Execution Quality Report



On receipt of an order the dealer will determine the objectives of the fund manager for the order. The size of the order and current market liquidity and condition will be assessed and a strategy will be decided upon. The main execution factors of price, speed and likelihood of execution will be taken into account.

ETF trading is mostly conducted through a request for quote process which allows trades to be executed directly with chosen counterparties. We continue to see a strong performance from Jane Street and Flow Traders who are the only brokers on the list whose primary business is Exchange Traded Products. This enables them to have a dedicated technology and infrastructure in this space.

The list of brokers is monitored continuously to ensure that the firm has the necessary coverage and choice to ensure best execution. The dealing desk uses an external TCA provider to provide data to analyse ETF trading. This data is used on a daily, weekly and monthly basis to review performance. The Transaction Equity Review Forum meets monthly to measure the implicit and explicit costs, performance of the dealers, brokers and market venues used by the brokers. Trends in performance will be monitored and any outliers will be investigated further. This is then fed into the Dealing Management Committee for review of all dealing activity. Brokers may be removed due to a decline in service and or performance.

12 Other Instruments

Regulatory Technical Standard 28

Class Of Financial Instrument	Other Instruments : Convertible Bonds				
Notification if <1 average trade per business day in the previous year	N				
Top five 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 a percentage of total in that class	Percentage of Passive Orders	Percentage of Aggressive Orders	Percentage of Directed Orders
TSOX BMTF	21.41%	22.42%	N/A	N/A	N/A
JEFFERIES LLC 58PU97L1COWSRCWADL48	16.56%	16.66%	N/A	N/A	N/A
BARCLAYS CAPITAL SECURITIES LTD K9WDOH4D2PYBSLSOB484	14.02%	16.97%	N/A	N/A	N/A
JP MORGAN SECURITIES PLC K6Q0W1PS1L1O4IQL9C32	11.36%	9.39%	N/A	N/A	N/A
CITIGROUP GLOBAL MARKETS LTD XKZZ2JZF41MRHTR1V493	6.01%	4.88%	N/A	N/A	N/A

Additional Counterparty Disclosures



To provide further transparency and to accurately reflect our venue selection process and order execution policy and behaviour, where an RFQ system appears in the top 5 table, we also disclose the identity of the top 5 counterparties we have most commonly executed against, on these trading venues:

Orders executed on TSOX	Other Instruments : Convertible Bonds
Top five counterparties ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class
JEFFERIES INTERNATIONAL LTD S5THZMDUJCTQZBTRVI98	36.76%
BARCLAYS CAPITAL SECURITIES LIMITED K9WDOH4D2PYBSLSOB484	29.76%
JP MORGAN SECURITIES PLC K6Q0W1PS1L1O4IQL9C32	9.01%
BNP PARIBAS ROMUWSFPU8MPRO8K5P83	8.74%
NOMURA INTERNATIONAL PLC DGQCSV2PHVF7I2743539	4.75%

Placement Article 65(6)

Class Of Financial Instrument	Other Instruments : Convertible Bonds				
Notification if <1 average trade per business day in the previous year	N				
Top five 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 a percentage of total in that class	Percentage of Passive Orders	Percentage of Aggressive Orders	Percentage of Directed Orders
M&G INVESTMENTS (SINGAPORE) PTE 21380025WDEGTPM9NX11	97.38%	94.97%	N/A	N/A	N/A
BMO CAPITAL MARKETS LIMITED L64HM9LHPDOS1B9HJC68	2.62%	5.03%	N/A	N/A	N/A

Additional Counterparty Disclosures



Where an affiliated dealing desk appears in the top 5 tables, to provide further transparency we have also disclosed additional information on the identity of the underlying top 5 counterparties with whom our affiliated dealing desk executed trades:

Orders executed on M&G INVESTMENTS (SINGAPORE) PTE LTD	Other Instruments : Convertible Bonds
Top five counterparties ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class
JEFFERIES INTERNATIONAL LTD S5THZMDUJCTQZBTRVI98	28.09%
JP MORGAN SECURITIES PLC K6QOW1PS1L1O4IQL9C32	27.55%
GOLDMAN SACHS INTERNATIONAL W22LROWP2IHZNBB6K528	20.07%
SMBC NIKKO CAPITAL MARKETS LIMITED G7WFA3G3MT5YHH8CHG81	7.70%
BANK OF AMERICA EUROPE DAC GGDZP1UYGU9STUHRDP48	6.59%

Placement Article 65(6)

Class Of Financial Instrument	Other Instruments : Non-EEA Equities with no tick size data				
Notification if <1 average trade per business day in the previous year	N				
Top five 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 a percentage of total in that class	Percentage of Passive Orders	Percentage of Aggressive Orders	Percentage of Directed Orders
M&G INVESTMENTS (SINGAPORE) PTE 21380025WDEGTPM9NX11	93.03%	79.99%	N/A	N/A	N/A
CITIGROUP GLOBAL MARKETS LIMITED XKZZ2JZF41MRHTR1V493	1.41%	5.95%	N/A	N/A	N/A
BANK OF AMERICA SECURITIES INC 549300HN4UKV1E2R3U73	0.66%	1.42%	N/A	N/A	N/A
MORGAN STANLEY & CO INTL 4PQUHN3JPFQFNF3BB653	0.60%	1.39%	N/A	N/A	N/A
INSTINET EUROPE LTD 213800MXAKR2LA1VBM44	0.55%	0.33%	N/A	N/A	N/A

Additional Counterparty Disclosures



Where an affiliated dealing desk appears in the top 5 tables, to provide further transparency we have also disclosed additional information on the identity of the underlying top 5 counterparties with whom our affiliated dealing desk executed trades:

Orders executed on M&G INVESTMENTS (SINGAPORE) PTE LTD	Other Instruments : Non-EEA Equities with no tick size data
Top five counterparties ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class
MORGAN STANLEY & CO INTERNATIONAL 4PQUHN3JPFQFNF3BB653	35.44%
JP MORGAN SECURITIES PLC K6QOW1PS1L1O4IQL9C32	19.11%
GOLDMAN SACHS INTERNATIONAL W22LROWP2IHZNBB6K528	12.90%
INSTINET SINGAPORE SERVICES PRIVATE 5493008VCV0WOYJD2O16	11.16%
UBS AG LONDON BRANCH BFM8T61CT2L1QCCEMIK50	7.01%

Execution Quality Report



On receipt of an order the dealer will determine the objectives of the fund manager for the order. The size of the order and current market liquidity and condition will be assessed and a strategy will be decided upon. The main execution factors of price, speed and likelihood of execution will be taken into account.

In the case of Convertible bonds, most trading is conducted on a request for quote basis (RFQ) and captured in the RTS 28 table above. Some orders will be placed with our affiliated desk in Singapore or with a broker to work on that countries exchange which is captured in the Placement Article 65(6) table above. The dealing desk uses an external TCA provider to provide data to analyse Convertible Bond trading. This data is used on a monthly basis to review performance. The Transaction Equity Review Forum meets monthly to measures the performance of the Convertible Bond brokers. Trends in performance will be monitored and any outliers will be investigated further. Finding and recommendations are presented to the Dealing Management Committee for review of all dealing activity.

The list of brokers is monitored continuously to ensure that the firm has the necessary coverage and choice to ensure best execution.

13 Securities Financing Transactions

Regulatory Technical Standard 28

Class Of Financial Instrument			Securities Financing Transactions - Equities		
Notification if <1 average trade per business day in the previous year			N		
Top five 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 a percentage of total in that class	
Tick size liquidity band 5 and 6 (from 2000 trades per day)					
EQUILEND EUROPE LIMITED EQLD		58.49%		46.88%	
GOLDMAN SACHS INTERNATIONAL W22LROWP2IHZNBB6K528		9.46%		5.21%	
BARCLAYS CAPITAL SECURITIES LTD K9WDOH4D2PYBSLSOB484		8.11%		3.13%	
CREDIT SUISSE AG DUBLIN BRANCH ANGGYXNXOJLX3X63JN8		3.78%		7.29%	
EQUILEND LIMITED EQIE		3.48%		10.42%	
Tick size liquidity band 3 and 4 (from 80 to 1999 trades per day)					
EQUILEND EUROPE LIMITED EQLD		83.49%		35.09%	
EQUILEND LIMITED EQIE		9.41%		26.32%	
BNP PARIBAS SECURITY SERVICES 549300WCGB70D06XZS54		5.44%		14.04%	
JP MORGAN SECURITIES PLC K6QOW1PS1L1O4IQL9C32		0.55%		3.51%	
BARCLAYS CAPITAL SECURITIES K9WDOH4D2PYBSLSOB484		0.38%		4.39%	
Tick size liquidity band 1 and 2 (from 0 to 79 trades per day)					
EQUILEND EUROPE LIMITED EQLD		45.48%		51.75%	
EQUILEND LIMITED EQIE		29.05%		28.94%	
BARCLAYS CAPITAL SECURITIES LTD K9WDOH4D2PYBSLSOB484		8.17%		2.20%	
BNP PARIBAS SECURITY SERVICES 549300WCGB70D06XZS54		3.99%		5.48%	
UBS AG BFM8T61CT2L1QCCEMIK50		2.76%		1.68%	

Class Of Financial Instrument			Securities Financing Transactions - Bonds		
Notification if <1 average trade per business day in the previous year			N		
Top five 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 a percentage of total in that class			
DEUTSCHE BANK AG 7LTWFZYICNSX8D621K86	21.16%	19.88%			
NATIONAL AUSTRALIA BANK F8SB4JFBSYQFRQEH3Z21	14.22%	13.65%			
BNP PARIBAS ROMUWSFPU8MPRO8K5P83	11.69%	8.89%			
CITIGROUP GLOBAL MARKETS LTD XKZZ2JZF41MRHTR1V493	10.83%	10.80%			
BARCLAYS BANK PLC G5GSEF7VJP5I7OUK5573	9.55%	6.79%			

Additional Counterparty Disclosures



To provide further transparency and to accurately reflect our venue selection process and order execution policy and behaviour, where an RFQ system appears in the top 5 table, we also disclose the identity of the top 5 counterparties we have most commonly executed against, on these trading venues:

Orders executed on EQUILEND EUROPE LIMITED - EQLD		Equities – Tick size liquidity band 5 and 6	
Top five counterparties ranked in terms of trading volumes (descending order)		Proportion of volume traded as a percentage of total in that class	
MORGAN STANLEY INTERNATIONAL 4PQUHN3JPFQFNF3BB653		29.14%	
GOLDMAN SACHS INTERNATIONAL W22LROWP2IHZNBB6K528		27.40%	
UBS AG BFM8T61CT2L1QCCEMIK50		21.44%	
CREDIT SUISSE SECURITIES (EUROPE) LIMITED DL6FFRRLF74S01HE2M14		8.14%	
THE BANK OF NOVA SCOTIA L3I9ZG2KFGXZ61BMYR72		7.90%	

Orders executed on EQUILEND LIMITED – EQIE		Equities – Tick size liquidity band 5 and 6	
Top five counterparties ranked in terms of trading volumes (descending order)		Proportion of volume traded as a percentage of total in that class	
CREDIT SUISSE AG DUBLIN BRANCH ANGGYXNXOJLX3X63JN86		60.12%	
SOCIETE GENERAL SA O2RNE8IBXP4R0TD8PU41		39.88%	

Orders executed on EQUILEND EUROPE LIMITED – EQLD	Equities – Tick size liquidity band 3 and 4
Top five counterparties ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class
GOLDMAN SACHS INTERNATIONAL W22LROWP2IHZNBB6K528	30.07%
CITIGROUP GLOBAL MARKETS LIMITED Z2JZF41MRHTR1V493	20.57%
JP MORGAN SECURITIES PLC K6Q0W1PS1L1O4IQL9C32	18.78%
BARCLAYS CAPITAL SECURITIES K9WDOH4D2PYBSLSOB484	12.49%
UBS AG BFM8T61CT2L1QCCEMIK50	7.25%

Orders executed on EQUILEND LIMITED – EQIE	Equities – Tick size liquidity band 3 and 4
Top five counterparties ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class
BNP PARIBAS SECURITY SERVICES 549300WCGB70D06XZS54	98.08%
NORDEA BANK AB 213800HW2E5VN9FK1Y53	1.06%
CREDIT SUISSE AG DUBLIN BRANCH ANGGYXNXOJLX3X63JN86	0.79%
UNICREDIT BANK AG 27CNRR8UK83OBTEK2170	0.08%

Orders executed on EQUILEND EUROPE LIMITED - EQLD	Equities – Tick size liquidity band 1 and 2
Top five counterparties ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class
BARCLAYS CAPITAL SERVICES K9WDOH4D2PYBSLSOB484	34.77%
JP MORGAN SECURITIES PLC K6Q0W1PS1L1O4IQL9C32	15.68%
CREDIT SUISSE SECURITIES (EUROPE) LIMITED DL6FFRRLF74S01HE2M14	11.91%
NOMURA INTERNATIONAL PLC DGQCSV2PHVF712743539	7.52%
GOLDMAN SACHS INTERNATIONAL W22LROWP2IHZNBB6K528	6.96%

Orders executed on EQUILEND LIMITED – EQIE	Equities – Tick size liquidity band 1 and 2
Top five counterparties ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class
BNP PARIBAS SECURITY SERVICES 549300WCGB70D06XZS54	77.79%
CREDIT SUISSE AG DUBLIN BRANCH ANGGYXNX0JLX3X63JN86	9.77%
BNP PARIBAS ARBITAGE 6EWKU0FGVX5QQJHFGT48	6.04%
UNICREDIT BANK AG 27CNRR8UK83OBTEK2170	3.10%
ING BANK N.V. 3TK20IVIUJ8J3ZU0QE75	1.29%

Execution Quality Report



Securities Financing Transactions (SFT) consist of Repurchase Agreements (Repo), Reverse Repurchase Agreements (Reverse Repo) and securities Lending. The underlying class of asset will be equity or bonds. Depending on the type of SFT, MAGIM execute orders in one of two ways. Electronically via the multi-asset class global trading platform Equilend or directly with Banks, known as bilateral execution. Equilend offers an effective method of execution by automating the trade process with different counterparties. Bilateral execution compliments the Equilend method of order execution and remains a crucial part of ensuring all sufficient steps are taken to ensure the best possible results for clients when executing orders. Equilend have established two electronic trading platforms, Equilend Limited domiciled in Ireland and the UK domiciled entity, Equilend Europe Limited. Both are used by MAGIM and are reflected in the top 5 tables accordingly. Where possible and appropriate dealers source multiple prices from different counterparties to make sure orders are transacted at the most competitive levels. The full range of approved counterparties is used over the course of business and as highlighted below; the performance of available counterparties is regularly reviewed. Due to the nature of arrangements involved in SFT's it is important both sides of transactions have a clear understanding on their legal status and obligations at all times. The Global Master Repurchase Agreement (GMRA) and the Global Master Securities Lending Agreement (GMSLA) are the industry accepted legal agreements for parties entering SFT's and MAGIM will require at least one of the agreements to be in place with a counterparty prior to concluding any SFT's.

In the case of Reverse Repo for cash management, Repo (for cash raising purposes) and Securities Lending Reverse Repo, MAGIM will typically determine price to be the most important execution factor when making assessments of the quality of execution. Speed and likelihood of execution will be considered but are unlikely to be placed above price. For these transactions size of the order and nature of the order will be considered immediately after the execution factor of price.

For securities lending and repo (for securities lending purposes) MAGIM will typically determine the nature of the order to be the most important execution factor when making assessments of the quality of execution. Speed and likelihood of execution will be considered but are unlikely to be placed above nature of the order. For these transactions price and size of the order will be considered immediately after the execution factor of nature of the order. However, many considerations such as time of day, event risk and market volatility to name a few may individually or collectively influence market liquidity

at any time. Therefore Dealer judgement is required to determine if the order of execution factors remain appropriate.

Occasionally, market orders may be considered too large for the available liquidity and if not executed appropriately could create adverse market movement that may negatively impact the customer. In such circumstances the order size may be the first execution factor considered. The MAGIM Execution Policy provides further information on the approach to the importance of the execution factors. During 2020 there were occasions when market volatility was particularly high due to risk events such as BREXIT and the COVID Pandemic. With respect to SFT's, MAGIM consistently ensured best execution standards were met at all times and did not deviate from the best execution approach as outlined in the MAGIM Execution Policy. Regular "working from home" was successfully and efficiently integrated into the operating model ensuring continued access to liquidity at all times. This did not disrupt the level of service provided to our clients.

A quarterly Transaction Execution Review Forum (TERF) is in place to review order execution outcomes (split by platform and bank outcomes), review methodology and benchmarks and look for ways to continuously improve execution arrangements. The output from the TERF is used to help review the list of execution venues to ensure MAGIM is able, on a consistent basis, to obtain the best possible results when executing orders on behalf of clients. Any new additions to the list of execution venues and counterparties are approved via the counterparty approval process as outlined in the MAGIM Execution Policy. During the calendar year 2020 Mizuho International PLC were added to the panel of execution venues available for SFT's. Additionally, an ongoing process of order execution monitoring including benchmarking and timely execution is in place to help ensure Dealing teams consistently obtain the best possible results and always act honestly, fairly and professionally in accordance with the best interest of the client.

The 2020 top 5 SFT tables demonstrate a healthy spread of order execution over circa 17 execution venues showing less reliance on any one individual source of liquidity. For all liquidity bands in Equities, Equilend consistently features. As previously mentioned this demonstrates an effective method of order execution by providing automated order execution.

MAGIM is fully committed and signed up to the UK Money Markets Code which covers Repo and Securities Lending when transacted in the UK. The code sets out expectations of best practice and is intended to promote a fair, effective and transparent market.



Important Information: For Professional Investors only.

The information herein does not constitute investment advice or any specific investment recommendations. While all reasonable care has been taken in preparing this information and it is believed to be reliable but we do not warrant its completeness or accuracy and no responsibility or liability is accepted for any errors of fact, omission or for any opinion expressed herein. It should be independently verified before further publication or use. Unless stated otherwise any views and opinions are those of M&G Investment Management Limited.

The material is not intended to provide, and should not be relied on for accounting, legal or tax advice. Reliance should not be placed on any views or information in the material when taking individual investment and/or strategic decisions.

The value of investments and the income from them may go down as well as up and investors may not get back the amounts originally invested.