

Article 65(6) / RTS28 Qualitative Report

Calendar Year 2018

Architas Multi Manager Limited

- LEI Number: [549300045BR8V1GNWF18](#)

Listed instruments:-

Architas Multi Manager Limited (“our”/”we”/”us”) does not currently *execute* orders directly on an exchange. Instead, we use a dedicated outsourced trading service (described further below) for order *placement*.

For calendar year 2018 we placed all of our **Equities** orders and specifically **Exchange Traded Fund** and **UK listed Investment Trust orders**, with Northern Trust Securities Limited (“NTSL”) for execution.

NTSL is a centralised outsourced dealer who acts as our execution broker, interacting with the wider market place to execute our orders with a network of different exchange brokers and execution venues, making use of various liquidity sources. NTSL use their expertise and judgement to select the most suitable venue given our specific instructions, the market environment, the asset class specifics and the size of the order.

Our Order Execution Policy lists various execution factors relevant to the types of **instruments** in which we *place* orders for execution.

These execution factors are as follows:

For Equities and Exchange Traded Funds:

- **Price**
- **Total cost of execution**
- **Speed of execution**
- **Likelihood of execution or settlement**
- **Size and nature of the order**
- **Any other consideration relevant to the efficient execution of the order (including the availability of liquidity and the market impact of the order).**

When placing orders in **Exchange Traded Funds**, due to the typically high availability of liquidity in this class of asset, **price** and the **total cost of execution** are our key execution factors as well as **speed of execution**. Typically our orders in **Exchange Traded Funds** are executed via a Request For Quote, price discovery process (“RFQ”) using competing market makers, also via NTSL. This process is a very transparent on-screen auction process using different competing market makers and authorised participants. We may do this at market or to align with a specific market open or close, depending on the size and nature of the order.

When placing orders in less liquid **Investment Trusts**, **price** is also an important factor. However, as Investment Trusts tend to be more illiquid and can offer significantly less on-screen liquidity we also consider the **likelihood of execution**, the **size of the order (and therefore the potential market**

impact) and the **total cost of execution** as important factors. We may take advantage of sources of natural liquidity. **Speed of execution** is less relevant to our typical orders in Investment Trusts. Depending on the size and liquidity of Investment Trust orders we may elect to place orders for execution “at market”, with a limit price or to work over a longer time period in line with any volume.

We have a fixed commission rate when transacting with NTSL but may transact at reduced costs when placing any on-market crosses or subscribing to Initial Public Offerings (IPOs) and placings. These rates are subject to review. We receive no rebates or material non-monetary benefits in respect of our arrangements with NTSL. NTSL acts as an integrated trading solution and has no proprietary trading desk or research service such that we are comfortable that any actual or perceived conflict of interest is therefore reduced.

During 2018 we monitored NTSL’s execution quality using monthly and quarterly transaction cost analysis reports to analyse the overall cost of execution compared to arrival price and other reference benchmarks as appropriate. Arrival price analysis compares the price at the order start time to the order execution time and allows us to assess the implicit cost of execution.

Results of the analysis have been in line with our expectations and we have seen a generally improving trend in performance relative to this arrival price benchmark; but we continue to regularly monitor execution quality. We also monitor NTSL’s use of different execution venues and brokers.

We have no close links, conflicts of interests or common ownerships with respect to any broker used for order placement or execution venues used by those brokers to execute our orders. We do not differentiate orders by client type and place orders only for professional clients with nothing for retail clients. We do not pay NTSL for research or other services using any broker commission and the service they offer us is for execution only. NTSL themselves do not structure or charge commissions in such a way as to discriminate unfairly across execution venues or counterparties.

The broker service level, execution quality and transaction costs are subject to regular review as well as on-going monitoring and assessment. We have reviewed NTSL’s Best Execution Policy and are satisfied that it meets both the FCA’s requirements and those of the business that Architas have carry out through them. Architas will continue to review the policy on at least an annual basis and whenever NTSL update it.

Architas have also reviewed NTS LLP’s Order Allocation Policy and have deemed it in line with the regulatory requirements and compatible with our duty to act in the best interests of our clients

For Collective Investment Schemes:

Collective Investment Schemes are executed at the prevailing daily price and for calendar year 2018 any orders in Collective Investment Schemes (“CIS”) were executed with the underlying transfer agent at the relevant daily price via our relevant dealing agent. We placed orders for execution with State Street Bank and Trust Co, BNP Securities Services (Luxembourg and Paris) and Vidacos Nominees Ltd.

Results of these assessments for both Equities and Collective Investment Scheme execution are reported to our Investment Committee on a quarterly basis. We have policies and procedures in place in order to ensure that arrangements with our counterparties are in the best interest of clients.

As part of our regulatory obligations we publish on an annual basis on our website the detail of the Top 5 execution venues for different instrument types in line with regulatory guidance.

Article 65(6) / RTS28 Qualitative Report

Calendar Year 2017

Architas Multi Manager Limited

- LEI Number: [549300045BR8V1GNWF18](#)

Architas Multi Manager Limited (“our”/”we”/”us”) does not currently *execute* orders directly on an exchange. Instead, we use a dedicated broker service (described further below) for order *placement*. Our Order Execution Policy lists various execution factors relevant to the types of **Equities** in which we *place* orders. These execution factors are as follows:

- **Price**
- **Total cost of execution**
- **Speed of execution**
- **Likelihood of execution or settlement**
- **Size of the order**

When placing orders in Exchange Traded Funds, due to the typically high availability of liquidity in this class of asset, **price** and the **total cost of execution** are our key execution factors.

When placing orders in less liquid Investment Trusts, **price** is also an important factor. Investment Trusts tend to be more illiquid and can offer significantly less on-screen liquidity. We therefore also consider the **likelihood of execution**, the **size of the order** and the **total cost of execution** important factors.

Speed of execution is less relevant to our typical orders.

Between 1 January 2017 and 27 September 2017 we placed all of our listed equity orders with State Street Global Markets (“SSGM”) who acted as a centralised agency broker and dealt with both the wider broker network, and execution venues, to source liquidity. On 27 September 2017 we ceased placing orders with SSGM because they ceased offering this service from the UK.

We replaced SSGM with Northern Trust Securities LLP (“NTSL”), effective 28 September 2017. Currently we place all of our listed equity orders with NTSL as a centralised agency execution broker, which interacts with the wider broker market place and deals on a network of brokers and execution venues. We have a fixed commission rate when transacting with them but may transact at reduced costs when placing any on-market crosses or subscribing to Initial Public Offerings (IPOs) and placings. We receive no rebates or material non-monetary benefits in respect to our arrangements with NTSL.

During 2017 we monitored SSGM’s and NTSL’s execution quality using transaction cost analysis reports to analyse the overall cost of execution compared to arrival price, interval VWAP (volume weighted average price) and other reference benchmarks as appropriate. Results of the analysis have been in line with our expectations and we continue to regularly monitor executions. We also monitor the broker’s use of execution venues and quality of execution at specific execution venues. We will refer to the first set of RTS27 reports published in 2018 for further detail on use of execution venues to see if they can be useful in any further analysis.

We will periodically consider appropriate new execution methods, brokers or venues and compare expected results with those we currently achieve to ensure we offer our clients best execution. The broker service level, execution quality, venue assessment and transaction costs are subject to an annual broker review as well as ongoing monitoring and assessment. Results of these assessments are reported to our Investment Committee on a quarterly basis. We have policies and procedures in place in order to ensure that arrangements with our counterparties are in the best interest of clients

We have no close links, conflicts of interests or common ownerships with respect to any broker used for order placement or execution venues used by those brokers to execute our orders. We do not differentiate orders by client type and place orders only for professional client with nothing for retail clients.