

MiFID II Annual RTS 28 Report 2023 - Comgest*

Class of Instrument	Equities - Shares and Depository Receipts				
Notification if < 1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class (%)	Proportion of orders executed as percentage of total in that class (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Citigroup Global Markets Europe AG- LEI 6TJCK1B7E7UTXP528Y04	15.516152	7.515466	38.61267	61.38733	0
J.P. Morgan SE- LEI 549300ZK53CNGEEI6A29	13.399708	7.397239	7.326525	92.673475	0
CLSA EUROPE B.V - LEI 213800DPWK1AXSAJZM30	12.175927	28.318011	72.250265	27.749735	0
UBS Europe SE- LEI 5299007QVIQ7IO64NX37	8.267137	3.882649	0	100	0
BOFA SECURITIES EUROPE SA- LEI 549300FH0WJAPEHTIQ77	8.085333	6.417022	0	100	0

Class of Instrument	Equities - Shares and 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	N				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class (%)	Proportion of orders executed as percentage of total in that class (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
BOFA SECURITIES EUROPE SA- LEI 549300FH0WJAPEHTIQ77	13.315798	11.272466	13.764016	86.235984	0
Citigroup Global Markets Europe AG- LEI 6TJCK1B7E7UTXP528Y04	11.029681	13.877991	53.69631	46.30369	0
MORGAN STANLEY EUROPE SE- LEI 54930056FHWP7GIWYY08	8.975147	7.773295	53.179374	46.820626	0
UBS Europe SE- LEI 5299007QVIQ7IO64NX37	8.500265	8.176427	16.940691	83.059309	0
CLSA EUROPE B.V - LEI 213800DPWK1AXSAJZM30	7.917878	6.136665	74.925198	25.074802	0

Class of Instrument	Equities - Shares and Depository Receipts: Tick size liquidity bands 3 and 4 (from 80 to 1999 trades per day)				
Notification if < 1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class (%)	Proportion of orders executed as percentage of total in that class (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
MORGAN STANLEY EUROPE SE- LEI 54930056FHWP7GIWYY08	12.773574	3.960593	46.282974	53.717026	0
Jefferies GmbH- LEI 5493004I3LZM39BWHQ75	9.866413	9.522	30.658324	69.341676	0
BARCLAYS BANK IRELAND PUBLIC LIMITED COMPANY- LEI 2G5BKIC2CB69PRJH1W31	9.01233	6.552635	60.350507	39.649493	0
BOFA SECURITIES EUROPE SA- LEI 549300FH0WJAPEHTIQ77	8.963723	16.871589	22.23132	77.76868	0
VIRTU EUROPE TRADING LIMITED - 213800EEC95PRUCEUP63	8.415036	7.399668	47.841307	52.158693	0

Class of Instrument	Equities - Shares and Depository Receipts: Tick size liquidity bands 5 and 6 (from 2000 trades per day)				
Notification if < 1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
BOFA SECURITIES EUROPE SA- LEI 549300FH0WJAPEHTIQ77	10.963572	9.231618	21.801465	78.198535	0
Citigroup Global Markets Europe AG- LEI 6TJCK1B7E7UTXP528Y04	10.300136	8.475224	63.435243	36.564757	0
MORGAN STANLEY EUROPE SE- LEI 54930056FHWP7GIWYY08	9.387867	5.653133	67.808064	32.191936	0
VIRTU EUROPE TRADING LIMITED - 213800EEC95PRUCEUP63	7.805485	6.362852	65.939808	34.060192	0
RBC Capital Markets (Europe) GmbH- LEI 549300SXSTGQY3EA1B18	7.392728	10.538203	0	100	0

Class of Instrument	Equity Derivatives: Futures and Options Admitted to Trading on a Trading Venue				
Notification if < 1 average trade per business day in the previous year	N				
	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
Top five execution venues ranked in terms of trading volumes (descending order)					
SOCIETE GENERALE INTERNATIONAL LIMITED- LEI 0IKLU6X1B10WK7X42C15	71.092051	93.911858	14.707305	85.292695	0
CACEIS BANK- LEI 969500235CR9X9F3L662	23.302997	0.863244	0	100	0
UBS Europe SE- LEI 5299007QVIQ7IO64NX37	5.604952	5.224898	0	100	0

Class of Instrument	Exchange Traded Products (Exchange Traded Funds, Exchange Traded Notes and Exchange Traded Commodities)				
Notification if < 1 average trade per business day in the previous year	N				
	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
Top five execution venues ranked in terms of trading volumes (descending order)					
Citigroup Global Markets Europe AG- LEI 6TJCK1B7E7UTXP528Y04	48.120566	44.191729	72.224585	27.775415	0
RBC Capital Markets (Europe) GmbH- LEI 549300SXSTGQY3EA1B18	34.590701	19.454887	0	100	0
BOFA SECURITIES, INC- LEI 549300HN4UKV1E2R3U73	17.126405	35.977444	81.191223	18.808777	0
REDBURN (FRANCE) SA - 213800DXGTBVO5RLOC54	0.162329	0.37594	60	40	0

Class of Instrument	Currency Derivatives: Swaps, Forwards and other Currency Derivatives				
Notification if < 1 average trade per business day in the previous year	N				
	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
Top five execution venues ranked in terms of trading volumes (descending order)					
Financial & Risk Transaction Services Ireland Limited FXALL / Refinitiv RFQ MIC Code: FXRQ	100	100	0	100	0

Class of Instrument	Other Instruments - Market Access Products				
Notification if < 1 average trade per business day in the previous year	Y				
	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
Top five execution venues ranked in terms of trading volumes (descending order)					
J.P. Morgan SE - LEI J.P. Morgan SE- LEI 549300ZK53CNGEEI6A29	56.329123	39.285714	0	100	0
UBS Europe SE - LEI UBS Europe SE- LEI 5299007QVIQ7IO64NX37	42.424432	32.142857	0	100	0
CLSA EUROPE B.V. - LEI CLSA EUROPE B.V - LEI 213800DPWK1AXSAJZM30	1.246445	28.571429	0	100	0

Class of Instrument	Other Instruments - Non EEA Tradable Instruments				
Notification if < 1 average trade per business day in the previous year	N				
	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
Top five execution venues ranked in terms of trading volumes (descending order)					
MORGAN STANLEY EUROPE SE- LEI 54930056FHWP7GIWYY08	52.273369	25.177447	0	100	0
Citigroup Global Markets Europe AG- LEI 6TJCK1B7E7UTXP528Y04	17.348839	15.58859	0	100	0
BTG PACTUAL US CAPITAL, LLC - 549300EUEDL5GKQW8U35	14.135258	31.29771	19.298246	80.701754	0
BRADESCO SECURITIES, INC. - 5493005BOEQY4OBZP25	12.608413	23.931967	0	100	0
SANFORD C. BERNSTEIN IRELAND LIMITED- LEI 549300W30847BJ1LD502	1.321364	0.924066	0	100	0

SUMMARY OF ANALYSIS AND CONCLUSIONS

* The data provided in this report relates to transactions (i) transmitted to brokers or counterparties and (ii) executed on a trading venue for Comgest Asset Management International Limited and Comgest S.A. in 2023, collectively hereafter referred to as 'Comgest'. Comgest transmits all orders to brokers or counterparties for execution, except for FX contracts which Comgest executes directly on a trading venue.

(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;

Equities, Exchange Traded Funds, American Depository Receipts (ADR) and Global Depository Receipts (GDR):

In determining best possible result Comgest places a high importance on the price achieved as well as the timeliness of the execution. Depending on criteria such as the nature of the order and the financial instrument involved, Comgest may place greater importance on the following execution factors:

- Likelihood of execution
- Size of the order

Comgest may select certain brokers due to their expertise in executing transactions in specific stocks or certain markets. This may happen, for example, in the case of emerging market securities where the price received may not be the lowest price available but where there is an increased likelihood of execution of the entire order.

While not weighted as heavily as price and execution, Comgest considers the following factors to be of high importance in selecting and assessing its brokers:

- Confirmations: the accuracy and timeliness in the delivery of confirmations.
- Likelihood of settlement: the performance of brokers in achieving timely settlement of transactions.

In addition, Comgest assesses and monitors the credit quality of the depository bank which issues the ADR or GDR prior to transacting and while a position is held.

Market Access Products:

In determining best possible result for Market Access Products Comgest places a high importance on price, the credit quality of the counterparty and the size of the order. Comgest ensures best execution by comparing the price quoted by the counterparty with the price of the underlying equity security.

Comgest assesses and monitors the credit quality of Market Access Product counterparties prior to the initial transaction and monitor the credit quality while the position is held

Exchange Traded Index Futures:

In determining best possible result Comgest places a high importance on the price achieved as well as the timeliness of the execution.

FX Contracts:

In order to achieve best execution for FX contracts Comgest places a high importance on price, the credit quality of the counterparty and the size of the order. Comgest aims to ensure best execution by comparing offers from counterparties of similar quality.

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

There are no close links, conflicts of interest or common ownership interests with respect to any brokers or counterparties used by Comgest to execute client orders.

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

There are no specific arrangements, discounts or rebates provided to or received from any brokers. Commissions charged by brokers on trades are as per pre-agreed terms and can be disclosed in client reporting on a trade by trade basis. Minor non-monetary benefits provided by brokers in the form of gifts and entertainment are accepted only in accordance with Comgest's Code of Ethics.

(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;

Comgest's selection of brokers and counterparties is intended to enhance the overall quality of execution. Comgest maintains a list of internally approved brokers and counterparties. In order to ensure that we act in our clients' best interests in selecting third party brokers/ counterparties for execution, Comgest follows a broker selection policy and counterparty review process. Apart from a small number of broker additions and removals no material changes were made to Comgest's Approved Broker and Counterparty list in 2023.

(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;

Order execution arrangements do not differ for any categories of Comgest's clients.

(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;

N/A - Comgest has Professional Clients only.

(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 Delegated Regulation (EU) 2017/575;

Comgest uses both an internal and a market standard transaction cost analysis tool for assessing the quality of execution obtained.

(h) where applicable, an explanation of how the investment firm has used output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU.

N/A – Comgest has not used data from consolidated tape providers during the period.

*Comgest was reliant on its Transaction Cost Analysis provider for production of most of the data contained in this report.
Comgest Asset Management International Limited is regulated by the Central Bank of Ireland.
Comgest S.A. is Regulated by the Autorité des Marchés Financiers - GP 90023.*