

The below data and summary analysis relates to orders executed by The Seaport Group Europe LLP in 2019.

Class of Instrument	Equities - Shares and Depositary Receipts				
Notification if <1 average trade per business day in the previous year	No				
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 a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
MORGAN STANLEY & CO. INTERNATIONAL PLC 4PQUHN3JPFQFN3BB653	36.34%	48.03%	44.54%	49.20%	0%
VIRTU FINANCIAL IRELAND LIMITED 549300XG5LFGN1IGYC71	25.86%	22.38%	37.21%	33.81%	0%
Barclays Capital Securities Limited K9WDOH4D2PYBSLSOB484	8.27%	2.50%	35.86%	35.02%	0%
Merrill Lynch International GGDZP1UYGU9STUHRDP48	7.03%	10.62%	37.75%	32.84%	0%
Banco Santander SA 5493006QMFDDMYWIAM13	4.20%	0.00%	100.00%	0.00%	0%

Class of Instrument	Debt Instruments - Bonds	
Notification if <1 average trade per business day in the previous year	No	
Top five execution venues ranked in terms of trading volumes (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
The Seaport Group Europe LLP LEI: 2138003MLD2U3GEMHS70	99.60%	93.94%
Bloomberg Trading Facilities Limited (BMTF) LEI: 549300ROEJDDAXM6LU05	0.40%	6.06%

Article 3(1) of RTS 28 of MiFID II requires that firms publish, for each class of financial instrument, a summary of the analysis from their monitoring of execution quality obtained on their top five client order execution venues.

(a) an explanation of the relative importance the firm gave to the execution factors of price, costs, speed, likelihood of execution or any other consideration including qualitative factors when assessing the quality of execution;

The Seaport Group Europe LLP (“SGE”) follows the principles of our Best Execution policy when executing trades. They require our traders to consider a number of factors that might be of relative importance when executing clients orders such as: Price, Liquidity, Costs, Speed, Likelihood of execution or settlement, Size of client order, Nature of client order, Characteristics of the transaction, Characteristics of the financial instrument, Characteristics of the execution venues to which the transaction can be directed and any other consideration relevant to the efficient execution of the client’s order.

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

SGE may place orders with Seaport Global Securities LLC (“SPGS”), which is a US broker dealer, under common ownership with SGE, for execution of client orders in US equities.

(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 concerning payments made or received, discounts, rebates or non-monetary benefits with any current execution venues.

(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;

There have been no material changes.

(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;

SGE’s clients are currently all categorised as professional or eligible counterparties. Our Best Execution policy must be applied to Professional Clients with those principles also considered for Eligible Counterparties.

(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;

We do not have Retail clients.

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

SGE undertakes both 1st & 2nd line monitoring of execution performance . The 1st line (trading team) carryout pre trade analysis & real-time monitoring of orders whilst 2nd line carryout post trade analysis using Bloomberg BTCA.

(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