



# HARPSDEN

WEALTH MANAGEMENT

## Top five entities used for the transmission or placing of client orders (2019)

Class of investment	Equities	Debt Instruments	Exchange traded products
Top 5 venues ranked in terms of volume (descending order)	<p>Raymond James Investment Services WRAP (213800YR9S9QWX3WF904) <a href="https://www.raymondjames.uk.com/legal-regulatory/top-5-execution-venues-by-volume/">https://www.raymondjames.uk.com/legal-regulatory/top-5-execution-venues-by-volume/</a></p> <p>Standard Life Savings limited (549300R6JDOZTOUPKM60) <a href="http://library.adviserzone.com/gen1498.pdf">http://library.adviserzone.com/gen1498.pdf</a></p>	<p>Raymond James Investment Services WRAP (213800YR9S9QWX3WF904) <a href="https://www.raymondjames.uk.com/legal-regulatory/top-5-execution-venues-by-volume/">https://www.raymondjames.uk.com/legal-regulatory/top-5-execution-venues-by-volume/</a></p> <p>Standard Life Savings Limited (549300R6JDOZTOUPKM60) <a href="http://library.adviserzone.com/gen1498.pdf">http://library.adviserzone.com/gen1498.pdf</a></p>	<p>Raymond James Investment Services (WRAP 213800YR9S9QWX3WF904) <a href="https://www.raymondjames.uk.com/legal-regulatory/top-5-execution-venues-by-volume/">https://www.raymondjames.uk.com/legal-regulatory/top-5-execution-venues-by-volume/</a></p> <p>Standard Life Savings Limited (549300R6JDOZTOUPKM60) <a href="http://library.adviserzone.com/gen1498.pdf">http://library.adviserzone.com/gen1498.pdf</a></p>
Notification if < 1 average trade per business day in the previous year	Yes	Yes	Yes

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Chartered



Under MIFID II legislation, we are obliged to disclose on an annual basis our top five execution venues. The tables above relates to the period 1<sup>st</sup> January 2019 to 31<sup>st</sup> December 2019.

As a firm, we do not execute orders or deal directly with execution venues. Instead, we transmit orders on behalf of our clients to third party wrap platforms. A wrap platform is an online investment administration service.

The entities identified in our report above are the third party wrap platforms to which orders for relevant investments have been placed during the previous year. Where we send investment applications or orders on your behalf to such third parties (for example, to buy or sell investment holdings), we make every effort to ensure the best possible result for our clients. This is referred to as best execution. A copy of our best execution policy is available on request.

Under the terms of our best execution policy, we regularly assess the third parties available to us to identify those that will enable us, on a consistent basis, to obtain the best possible result when arranging for the execution of client orders.

The platforms and venues that we use also have responsibilities in relation to best execution and client order handling. We undertake periodic monitoring to make sure that they continue to meet our requirements.

We classify all clients as retail clients for the purposes of best execution. We will therefore predominantly use price as the most important factor when arranging for the execution of client orders although we will take into account other factors where required.

We do not have any conflicts, close links or common ownerships with respect to execution venues and we do not receive any rebates, discounts or payments for sending orders to a platform or venue.

In the period under review, there have been no changes to the venues listed in our execution policy.

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