

Tages Capital LLP – Annual Best Execution Disclosure 2018



A specialist alternative asset manager

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Tages seeks to operate to the highest standards of ethics and integrity, managing conflicts and ensuring that our activities on behalf of clients are designed to result in the best possible outcomes. This approach is aligned with the MiFID requirements for us to take all sufficient steps to obtain, when executing orders, the best possible result for our clients. This applies whether we are executing orders on behalf of clients or placing orders with, or passing orders to, others for execution.

Currency Derivatives		Fewer than 1 trade per day over the year on average? Yes				
Top five FX Execution venues ranked in terms of trading volume	LEI	Proportion of Volume traded as a percentage of total ¹	Proportion of orders executed as a percentage of total ²	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
The Northern Trust Company	6PTKHDJ8HDUF78PFWH30	53.93%	31.04%	N/A	N/A	N/A
BNP Paribas Securities Services	549300WCGB70D06XZS54	46.07%	62.96%	N/A	N/A	N/A

Notes

This document covers all transactions executed during the period 1st January 2018 to 31st December 2018. ¹ Volume is the market value of the transaction. ² The number of orders is the number of client orders (not the number of shares/units or number of sub-orders into which a client order is divided) meaning that an asset manager's decision to deal for a fund and two parallel accounts would be three client orders. The expression of these order as passive, aggressive or directed is not applicable.

Introduction

Tages LLP's delivery of best execution is a key element in its commitment to act in the best interests of its clients, as well as being a regulatory requirement. The Firm prioritises ensuring that all sufficient steps are taken to obtain the best possible result for its clients when it executes, places or transmits orders on their behalf. This means taking into account the 'execution factors' such as price, costs, speed, likelihood of execution and settlement, size, nature or any other consideration relevant to the execution of the order.

Importance of the relevant execution factors

The relative importance of the execution factors is judged on an order-by-order basis in line with the Firm's industry experience and prevailing market conditions.

Where derivatives are executed directly, key factors considered are price, size and overall transaction costs. Prices are compared using a request for quote (RFQ) process, taking into account additional transaction costs that may be applicable. When transactions are time-sensitive, response time to RFQ is often a defining factor. On occasion, preference is given to counterparties that are operationally easier to work with where time factors are at play.

Where orders are executed indirectly, relevant factors are costs and the existing counterparty relationship.

Monitoring the quality of execution venues

As part of the Firm's analysis of best execution in relation to currency derivatives, all trades are executed on the Bloomberg FXGO system, which provides both the Bloomberg mid-rate and real time quotes from other counterparties at the time of execution to illustrate RFQ competitiveness. The monitoring completed supported that best execution was obtained consistently on the approved execution venues throughout the year. As part of our best execution monitoring procedures we have considered the data published under Commission Delegated Regulation (EU) 2017/575 by the trading venues we have used, those of our counterparties which operate as systematic internalisers and a sample of reports published by other execution venues which we do not currently utilise.

When selecting execution venues for inclusion in the execution policy, the Firm does not take into account the fees and commissions that it will charge its clients but focuses on the potential of the venues to enable the Firm to obtain on a consistent basis the best possible result for the execution of its client orders. The monitoring completed supported that best execution was obtained consistently on the approved execution venues throughout the year.



Close links, conflicts and common ownerships

The Firm does not have any “close links” (as defined by the Financial Conduct Authority), conflicts of interests or common ownerships with respect to the execution venues it uses to execute orders. The Firm has not received any payments, discounts or non-monetary benefits from the trading venues or brokers used to execute trades on behalf of its clients.

Change in execution venues used

During the period under review, Tages’ list of execution venues was unchanged.

Client Type

While Tages does take the characteristics of its clients into account when judging the relative importance of the execution factors, the Firm’s clients are exclusively professional clients and so are treated with a consistent approach. The Firm does not execute retail client orders.

The Firm’s use of consolidated tape providers

The Firm did not use any consolidated tape providers in determining “best execution” during the year

Tages Capital LLP is satisfied that it has adhered to its best execution policy during 2018

Tages Capital LLP (“Tages Capital”) is authorised and regulated by the Financial Conduct Authority (“FCA”) in the United Kingdom. Tages Capital is incorporated in England and Wales under registered number OC364873 with registered office 39 St James’s Street, London, SW1A 1JD. Tages Capital is part of Tages Group which also comprises Tages Capital SGR S.p.A., an Italian asset manager, registered at n. 132 of the register of AIFMs held at the Bank of Italy.

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