

Information of J&E Davy's Top 5 Execution Venues/Counterparties & Execution Quality Obtained – 2020

In line with the requirements of Article 27 (6) of MiFID II and as prescribed in the Commission Delegated Regulation (EU) 2017/576, J&E Davy (hereinafter, 'Davy') is required to summarise and make public on an annual basis the top five execution venues for the various classes of financial instruments in which Davy arranges for its clients' orders to be executed.

This document provides information on the quality of execution for clients in 2020 and should be read in conjunction with the asset-class specific tables [published on our website](#). Notes and guidance on interpreting these Top 5 tables are found at the bottom of this document.

Davy is comprised of two distinct business divisions that arrange for clients' orders to be executed. The wealth management division (Davy Private Clients and Davy Select) offers investment advice and execution only services to an overwhelmingly Retail client base. Davy Capital Markets offers brokerage services to institutional clients comprised of Professional Clients and Eligible Counterparties. Due to differences in the nature of the services offered, some of the information below has been distinguished by business division.

	Wealth Management Division	Capital Markets Division
Explanation of the relative importance the firm gave to the execution factors	<p>Davy's Execution policy sets out the relative importance of the various execution factors. Total consideration is the primary execution factor for Retail client orders. Total consideration is a function of the price of an instrument net of execution costs.</p> <p>The other execution factors listed in Davy's policy may be afforded a higher/lower priority to better ensure the best possible result for client orders. Priority of these other factors is determined with reference to the characteristics of the client, the order, the instrument, the venue and also the specifics of the client's instruction. Further information may be found in Davy's execution policies.</p>	<p>Davy's Execution policy sets out the relative importance of the various execution factors. In general, price is prioritised over the other execution factors listed in Davy's execution policy. However, other factors may be afforded a higher priority to better ensure the best possible result for client orders. Priority of these other factors is determined with reference to the characteristics of the client, the order, the instrument, the venue and also the specifics of the client's instruction. Further information may be found in Davy's execution policies.</p>
Description of any close links, conflicts of interests, and common ownerships with respect to any execution venues	<p>Davy is a member of Euronext Dublin and a participant of CBOE Europe Ltd. J&E Davy (UK) Limited, an affiliate of J&E Davy, is a member of the London Stock Exchange. In 2020, Davy acted as a systematic internaliser in respect of Irish Sovereign Debt.</p>	

Description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received	N/A	
Explanation of the factors that led to a change in the list of execution venues	<p>The execution venues and principal counterparties included in the list published on Davy's website is frequently reviewed.</p> <p>Bank of America Merrill Lynch was removed as a broker to Davy's wealth management division in the reporting period. There were no other material or significant changes to the list of wealth management venues/brokers in the reporting period.</p>	<p>The execution venues and principal counterparties included in the list published on Davy's website is frequently reviewed.</p> <p>In the reporting period (2020), there were no material changes to the venues and brokers accessed by Davy Capital Markets.</p>
Explanation of how order execution differs according to client categorisation	There is no differentiation between Retail and Professional client orders in the wealth management division and as such, total consideration is the primary execution factor for all client orders.	Davy Capital Markets does not have a direct relationship with Retail clients. DCM affords best execution to Professional clients only, unless otherwise agreed with Eligible Counterparties.
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	Total consideration is the primary execution factor for Retail client orders.	Davy Capital Markets does not have a direct relationship with Retail clients.
Explanation of how the investment firm has used any data or tools relating to the quality of execution, including any data published by execution venues	Davy makes use of a 3rd party trade benchmarking system to compare the quality of execution of client orders with market data. The Top 5 venues/counterparties information is generated using this 3rd party system.	

Explanation of how the investment firm has used output of a consolidated tape provider	N/A. No consolidated tape provider has been established.

Notes and guidance on interpreting the asset-class specific top 5 venues/counterparties tables

- The Davy Capital Markets Fixed Income Desk acted as a systematic internaliser in Irish Sovereign Debt instruments and as principal in its dealings in other instruments (e.g. corporate debt) for clients. 'Off Exchange Transactions' in Davy's top 5 venues tables for debt instruments denotes Davy dealing in a principal capacity for clients via an MTF such as *TradeWeb* or *MTS*.
- In relation to the placement reports, as all orders are traded on a principal basis, therefore are all shown to be placed through J&E Davy.
- Collective Investment Schemes, which typically have a single execution venue (e.g. transfer agent) and are traded at the instrument's net asset value at a prescribed point in time, are included in the data supporting the 'Placement - Other Instruments' tables for Retail and Professional clients.
- Where there was less than one trade per month on average for a class of financial instrument, information was not considered to be meaningful for clients and reports for such asset classes have not been published.