

WITAN INVESTMENT SERVICES LIMITED

BEST EXECUTION REPORT FOR 2017

1. BACKGROUND

Following the implementation of MiFID II on 3 January 2018, Witan Investment Services Limited ("WIS") is required to make certain annual disclosures on the top five execution venues/investment firms with whom it has placed orders for execution in the previous year. The specific information to be provided is set out in Regulatory Technical Standard 28 ("RTS 28") of MiFID II.

RTS 28 requires WIS to complete specific templates for each class of financial instrument in which it places orders, setting out the percentage volume and number of orders of its top five brokers and information on the quality of the execution obtained. This information has to be broken down by retail clients and professional clients. WIS does not provide services to professional clients so the information provided is solely based upon orders executed on behalf of retail clients.

CONFLICTS OF INTEREST

In accordance with RTS 28, WIS is also required to provide information on any close links, conflicts of interest and common ownerships it might have with the investment firms with which it places orders. WIS can confirm that it has no close links, conflicts of interest nor common ownerships with its brokers.

WIS is also able to confirm that it has not entered into specific arrangements with its brokers regarding payments made or received, discounts, rebates or non-monetary benefits. Prior to the implementation of MiFID II, WIS took the decision to pay for all research it receives from its brokers and third-party research providers directly out of its own resources.

2. BEST EXECUTION POLICY

WIS acts as the manager of two investment trust savings schemes through which investors are able to invest in the shares of two investment trusts, Witan Investment Trust plc (WIS's parent) and Witan Pacific Investment Trust plc. Prior to clients investing in the savings schemes WIS provides its clients with its Best Execution Policy within the products Terms and Conditions.

As required under RTS 28, an explanation of the relative importance that WIS 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 is described below:

Obtaining the best possible result

In seeking to obtain the best possible result for you when placing your orders for execution, WIS will take into account the following execution factors: the share price of the underlying Fund; costs associated with the execution; speed and likelihood of execution and settlement; and the size and nature of the order. Although we review all of these factors, we will usually give the highest priority to price and cost, which is often referred to as total consideration.

WIS will normally transmit your orders to the official stockbroker of the relevant Fund for execution. The official stockbroker to the Funds is J.P. Morgan Securities plc (JP Morgan) and we believe that it is best placed to provide us on a consistent basis with a competitive market price and the required level of liquidity. At all times, JP Morgan is obliged to provide 'Best Execution' and act in your best interests. WIS regularly monitor the prices at which JP Morgan executes your transactions to ensure that it meets this obligation.

In the future, WIS may enter into agreements with additional stockbrokers if WIS believe that it is in our client’s best interests to do so. WIS will ensure that any stockbroker selected is subject to the same Best Execution obligations as JP Morgan and WIS will monitor the prices they achieve to ensure this.

Execution Venues

Although JP Morgan will normally execute transactions on a Regulated Market or Multilateral Trading Facility (‘MTF’), WIS have given JP Morgan consent to deal outside a Regulated Market or MTF on the basis that this would be undertaken to achieve the best possible result for our clients.

Monitoring

At least on an annual basis WIS will monitor the effectiveness of the arrangements we have put in place for the placement, execution and settlement of our client’s orders. This review will include an assessment of whether JP Morgan continues to provide the best possible result for our clients on a consistent basis.

WIS only executes orders for one classification of clients, retail clients, and applies the same broker selection process consistently across all retail clients.

3. TOP FIVE BROKERS BY CLASS OF FINANCIAL INSTRUMENT

The data relates to the calendar year 2017

Class of instrument	Equities - Shares & Depository Receipts				
Notification if less than 1 average trade per business day in the previous year	N				
Top 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**
J.P. Morgan Securities plc LEI: K6Q0W1PS1L104IQL9C32	100%	100%	N/A	N/A	0%

* RTS 28 requires firms to set out the percentage of orders that were passive and aggressive orders. A ‘passive order’ is an order that effectively provides liquidity, while an ‘aggressive order’ is one that takes liquidity. As set out in ESMA’s Investor Protection Q&A (Q 14), portfolio managers should only identify passive or aggressive orders where the portfolio manager has attached a specific instruction to an order, and that instruction is understood to mean that the broker will execute the order in a fashion that is either passive or aggressive. The distinction between ‘passive’ and ‘aggressive’ is not relevant to WIS’s trading.

** RTS 28 requires firms to set out the percentage of orders that were directed orders. A ‘directed order’ is an order where a specific execution venue is specified by the client prior to the execution of the order. There have been no ‘directed orders’ by WIS.

Notes on the report:

This information has been collated in accordance with the requirements in Art 65(6) of Commission Delegated Regulation 2398 of 25 April 2016, adopted under Articles 24(1) and 24(4) of MiFID II (Markets in Financial Instruments Directive). Witan Investment Services Limited only trades on behalf of ‘retail clients’ therefore the report has been produced in accordance with ‘Table 1’ requirements under RTS 28.