BNY | INVESTMENTS
NEWTON

# NEWTON ORDER EXECUTION POLICY

## BNY Investments Newton

June 2026

BNY Investments Newton is the name for a group of affiliated companies that provide investment management services under the trading name of 'Newton' or 'Newton Investment Management': Newton Investment Management Limited (NIM), registered in the UK, and Newton Investment Management North America LLC (NIMNA), registered in the US. Unless otherwise stated, this policy applies to NIM only.

# CONTENTS


3 **Purpose and scope**

4 **How will orders be executed for the client?**

4 **Best execution obligation and relevant factors**

9 **Execution venues**

10 **Factors affecting the choice of execution venue**

10 **Selection and monitoring process for execution venues**

11 **Executing orders outside a trading venue**

11 **Specific instructions**

11 **Order aggregation and allocation**

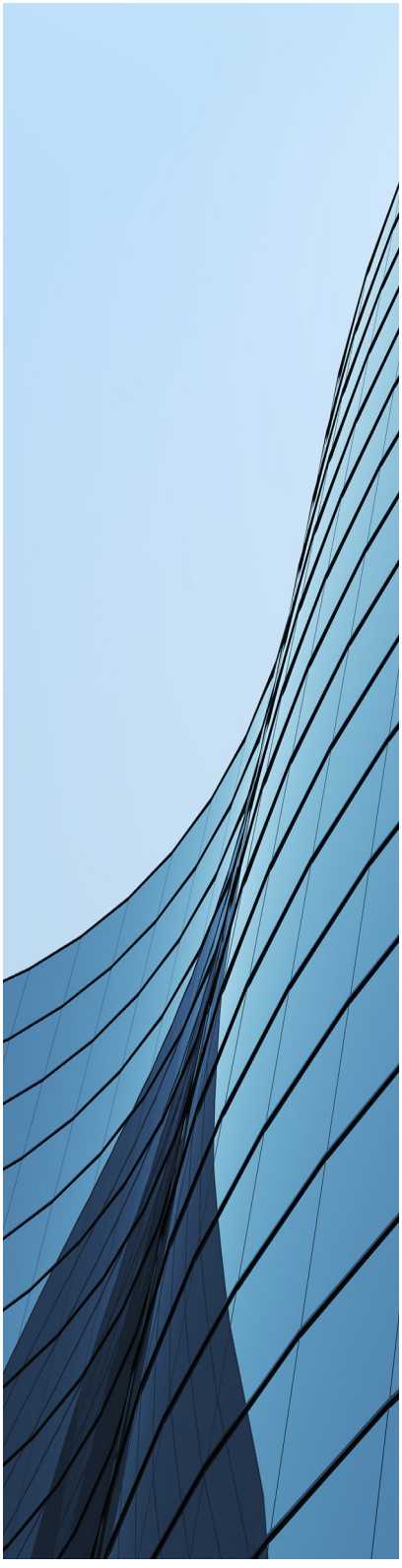
- 11 Aggregation
- 12 Trade co-ordination
- 12 Allocation

12 **Monitoring and oversight review**

13 **Appendix**

- 13 List of execution venues

# PURPOSE AND SCOPE



## Purpose

This document sets out the order execution policy and approach to providing best execution for clients of Newton Investment Management Limited ('Newton'[1] or 'we'), as required by the Markets in Financial Instruments Directive 2014/65/EU ('MiFID') and Markets in Financial Instruments Regulation EU 600/2014 (MiFIR) (the Directive and Regulation together "MiFID II"). All terms used in this document are defined in accordance with MiFID II and the Onshoring of MiFID II in the UK.

Newton places and executes orders across multiple asset classes, including equities, derivatives, fixed income, collective investments and currencies.

When we execute orders, MiFID II requires us to take all sufficient steps to obtain the best possible result for our clients taking into account price, costs, speed, likelihood of execution and settlement, size, nature, or any other consideration relevant to the execution of the order. This applies whether we are executing orders on behalf of clients or placing orders with/passing orders to others for execution.

The obligation to take all sufficient steps to obtain the best possible result for clients is referred to as our obligation of best execution.

## Scope

This policy applies to trades executed or placed by Newton, or where Newton place or transmit orders as BNY Index Investments (a registered trading name in the UK of Newton Investment Management Limited), on behalf of its clients, acting as their agent, and only to dealings in financial instruments (each as defined in MiFID II).

This policy only applies to those clients of Newton that have been categorised as professional clients under MiFID II.

All investment decisions for Newton's active business are made by Newton's portfolio managers who send orders to the Newton dealing desk who will execute or place orders with other brokers according to this policy. This ensures there is a segregation of duties between trading and investment management. All investment decisions for client portfolios managed under the BNY Index Investments trading name are made by the Newton portfolio managers operating under BNY Index Investments. Orders for this business will be transmitted to an internal affiliate broker for execution in order to achieve the best outcome based on the characteristics of the relevant strategy and to manage any potential conflicts of interest with other client orders.

1 The term 'Newton' is used in this document to refer to: Newton Investment Management Limited

# HOW WILL ORDERS BE EXECUTED FOR THE CLIENT?

COBS 11.2A of the FCA Handbook requires that when executing orders on behalf of our clients we take all sufficient steps to obtain the best possible result ('best execution') taking into account all relevant factors, including:

- price
- costs (implicit and explicit)
- size
- speed
- likelihood of execution
- likelihood of settlement
- any other factor relevant to the execution of the order.

The relative importance of each of these factors within our dealing process will vary depending upon a number of criteria, namely:

1. the investment intent of the portfolio manager who created the order;
2. the characteristics of financial instruments that are the subject of that order;
3. the characteristics of the execution venues to which that order can be directed; and
4. the characteristics of the strategy, such as passive strategies, to which those orders relate.

We state the relative importance of these factors in general situations in the asset class-specific sections below.

# BEST EXECUTION OBLIGATION AND RELEVANT FACTORS

When executing orders, we will take all sufficient steps to achieve best execution. The factors that we will consider when executing orders are as follows:

| | |
|---|---|
| **Price** | The price at which a financial instrument is executed |
| **Speed** | The time it takes to execute a transaction |
| **Costs** | The implicit costs such as the possible market impact, and explicit external costs (e.g. trading commissions or financial transaction taxes such as UK stamp duty) |
| **Size** | The size of the transaction executed for a client accounting for how this affects the price of execution |
| **Settlement and execution** | Likely to be relevant where certainty that a particular trade will be settled efficiently and without problem takes precedence over other factors, for example in response to an urgent client-driven request. |
| **Nature of the transaction and/ or market** | The particular characteristics of a client transaction can affect how best execution is received |

**Relative execution factor importance**

Best execution does not demand that firms achieve the best possible results with every trade but stipulates that the focus is on taking all sufficient steps for obtaining the best possible result on a consistent overall basis via a clearly defined process of policy, execution, review and refinement. Below we describe the key features of our approach to the execution of orders across different asset classes:

## A. Equities

Newton selects from the range of available equity execution strategies to connect with major or desirable execution venues and counterparties and to maximise access to liquidity or, where relevant, to minimise the impact on price of an order.

Equity orders are placed electronically via an execution management system or directly to the counterparties using the Financial Information Exchange (FIX) connectivity messaging protocol in order to allow access to counterparty-provided proprietary trading algorithms and multiple venues or exchanges, as well as minimise the risk of transactional error. Alternatively, equity orders are placed via telephone or over the Bloomberg messaging service.

Accessing counterparty-provided algorithms is a key component of Newton's execution capabilities as these tools offer control, anonymity and customisation potential, leading to better execution outcomes for Newton's clients. Newton employs a risk, competency and control framework over these trading tools to mitigate the risks associated with automated execution and this is available to our clients for inspection on request.

Where appropriate, for example where there is significant number of orders appropriate for a simultaneous transaction, Newton may use commoditised ('program') trades that can be executed to optimise trading efficiency and reduce the cost to the client. In this instance Newton can use a preferred pre-trade analysis tool to review general liquidity parameters to guide the execution strategy. Examples of where Newton may use program trading include new money from clients ('inflows'), dealing with client outflows or implementing asset allocation changes.

Where BNY Index Investments portfolio managers specify instructions relating to the strategy they are pursuing on behalf of clients and for the nature of the order that they are generating, their instructions may vary depending on whether the order was driven by cash inflows or outflows or by changes in the PM's view or underlying models, including a change in particular investment or type of exposure. Such instructions help influence the prioritization of the execution factors. Market-on-close orders typically prioritize the execution factors of likelihood and speed of execution at the required time.

Subject to Newton's aggregation and allocation policy, multiple client equity orders are aggregated for efficiency and in order to achieve a better execution result overall. However, any equity orders placed by BNY Index Investments are not aggregated with other Newton client orders.

The diagram below shows the relative importance that Newton generally places on the execution factors when executing an equity trade. These can vary according to liquidity, urgency and volatility but we will generally use price as our leading execution factor for this asset class.

## B. Fixed Income

The fixed-income markets are not centrally traded in the same way that equities generally are and, for many non-government debt issues and in certain regions, are significantly less liquid.

For those relevant financial instruments for which there is an observable market price, under standard market conditions we will research a variety of different execution venues or counterparties. We will seek to trade an order with the execution venue or counterparty that provides the most attractive price and is also able to address any other aspects of the transaction that are material to it.

Newton may trade via electronic trading platforms and voice/telephone auctions. Trades will typically be executed electronically but larger trades may be undertaken directly with a market maker or broker.

Newton will use electronic dealing platforms which have a 'request for quote' model that electronically recreates an auction process and automatically generates an audit trail of the quotes received from counterparties including brokers.

Quotes are generally obtained from more than one counterparty where there are multiple potential counterparties for a transaction that can be contacted without adversely affecting the relevant market and inadvertently compromising the ability of Newton to obtain the best price available. However, such an approach is not always possible or desirable, for example in certain less liquid markets or prevailing market conditions or where there is only one counterparty for large-size orders.

If only one counterparty offers a quote, for example in less liquid markets or where we believe the size of the order may have an adverse effect on the market and inadvertently compromise the ability of Newton to obtain the best price available, we will make a judgement on whether the price is fair and achieves best execution for the client. Examples of the factors that Newton considers in making this judgement include, but are not limited to, historical comparison to pricing of bonds of similar maturity, credit quality, size of issue, urgency of completing the trade, third-party vendor pricing if available, and external or internal pricing models or tools.

Subject to Newton's aggregation and allocation policy, multiple-client fixed-income orders are aggregated for efficiency and in order to achieve a better execution result overall. However, any fixed income orders placed by BNY Index Investments are not aggregated with other Newton client orders.

The diagram below shows the relative importance that Newton generally places on the execution factors when executing a fixed-income trade. These can vary according to liquidity, urgency and volatility but we will generally use **price** as our leading execution factor for this asset class.

## C. Foreign Exchange (FX)

Foreign exchange (FX) trades are conducted either through a client's appointed custodian bank or through a third-party bank on Newton's list of approved counterparties. Newton undertakes an active negotiation process with regard to those direct FX transactions it undertakes for clients.

Where Newton does retain responsibility for FX trading, all dealing is executed via the FXall and FX Connect multilateral trading facilities (MTFs), which allow electronic routing and execution of trades. Prior to trading, and where permitted, currency exposure will be netted as much as possible to ensure we are trading in the most efficient manner. All rates offered by our banks are collated through the relevant MTF platform; should the rates quoted be unsatisfactory, they will be challenged to ensure we are achieving the best execution.

All FX spot trading undertaken by Newton is actively negotiated. Trades are either executed with the client's custodian bank or with a bank from our approved list of third-party counterparties. For certain transactions we would put banks in competition with each other. This decision to initiate a competition would depend on currency pair, size of deal and market conditions at the time, but typically we would ask up to 10 banks to quote on each FX trade, using the functionality within FXall and FX Connect where appropriate.

Subject to Newton's aggregation and allocation policy, multiple client FX orders may be aggregated for efficiency and in order to achieve a better execution result overall. Transactions in the same currency pair can also be netted off against each other, resulting in one side of the trade receiving a better price than that which would have been received if traded separately. However,

any FX orders placed by BNY Index Investments are not aggregated with other Newton client orders.

However, in certain circumstances, Newton may execute FX transactions with a client's custodian, which may not be an approved counterparty. The circumstances in which Newton may execute an FX transaction with a client's custodian are as follows:

I. the client has authorised Newton to execute FX transactions with the client's custodian only; or the client has not authorised Newton to execute FX transactions with any approved counterparty other than the client's custodian;

II. the transaction relates to a restricted currency, in which case it is typically affected through a standing instruction arrangement;

III. Newton has given standing instructions to the client's custodian for the purposes of operational efficiency, typically where the transaction relates to the repatriation of income;

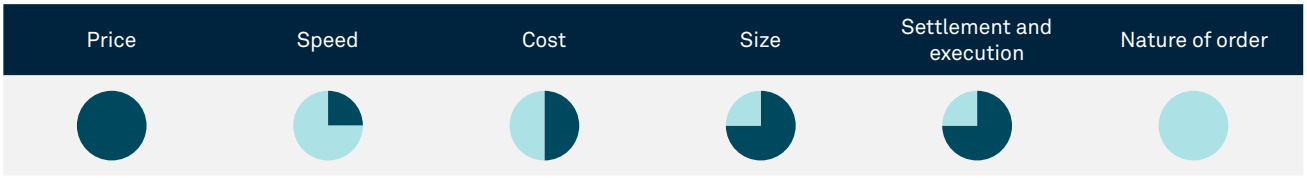
IV. transacting with the client's custodian is appropriate having regard to the best execution factors listed above; or

V. the client's custodian is an approved counterparty.

Please note that Newton may not obtain competitive quotes or monitor the rates obtained in cases (i), (ii), (iii) or (iv) above.

(Please also note that Newton does not perform an assessment of counterparty risk or any similar due diligence in respect of a client's custodian, unless it is also an approved counterparty.)

The diagram below shows the relative importance that Newton generally places on the execution factors when executing an FX trade. These can vary according to liquidity, urgency and volatility but we will generally use price as our leading execution factor for this asset class:




## D. Exchange-Traded Derivatives

When undertaking transactions in this asset class Newton considers all execution factors other than price to generate a selection of potential counterparties appropriate for a particular order. In certain cases, this process can result in there only being one counterparty deemed appropriate for a particular order. This process is followed to ensure aspects such as counterparty risk or the risk of settlement failure are minimised. Price is then used as the execution factor across the chosen subset of counterparties to select the particular execution venue or counterparty for each trade. Orders can be placed electronically to the counterparties, potentially using a 'request for quotes' process, or over the phone. Exchange-traded derivatives may also be traded on exchange through counterparties at prevailing market prices if liquidity permits.

Listed futures in both equity and bond contracts are placed with an approved trading counterparty which will then trade these on a trading venue. UBS and JP Morgan act as our futures clearing members. Exchange-traded derivative orders placed by BNY Index Investments will follow the same approach as Newton's active business, but there will be no order aggregation applied to BNY Index Investments orders.

The diagram below shows the relative importance that Newton generally places on the execution factors when executing an exchange-traded derivative trade. These can vary according to liquidity, urgency and volatility but we will generally use **settlement and execution**, followed by **price**, as our leading execution factors for this asset class.

## E. OTC Derivatives

All over-the-counter (OTC) derivative products must be traded under industry legal documentation. This means our choice of counterparty for trading currency forward contracts OTC derivatives is generally limited to those counterparties where the required documentation is in place. As with the process for bond trading detailed above, how we execute an OTC derivative trade will be very much dependent on the nature of the instrument, the size of the transaction and the liquidity available. Generally, Newton's exposure to OTC derivatives is limited to forward FX, custom basket Total Return Swaps (TRS) and US/Euro Index CDS. All counterparties in this asset class will be required to have the appropriate legal documentation in place before we trade with them.

**Forward Foreign Exchange Contracts (FFX)**

Deliverable and non-deliverable forward FX trades are typically traded with one counterparty from our approved counterparty list, selected by our trader based on a number of factors including previous execution quality, urgency and whether shorter settlement is required. Should there be a need to close out a forward or roll to a future date, this would typically be done with the same bank, subject to any execution quality concern or counterparty credit concern. These trades may also be dealt through one counterparty.

The diagram below shows the relative importance that Newton generally places on the execution factors when executing a Deliverable and non-deliverable forward FX trade. These can vary according to liquidity, urgency and volatility but we will generally use **price** as our leading execution factor for this asset class.

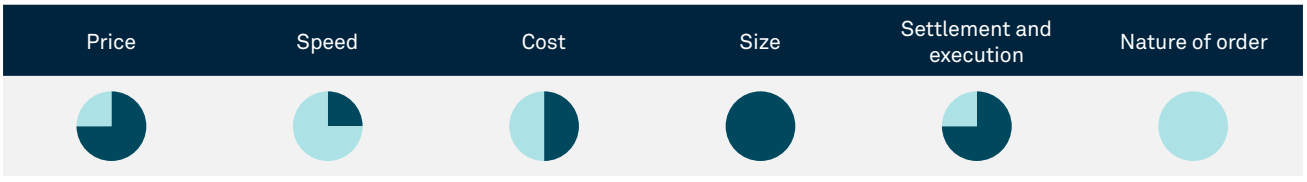
**Other OTC Derivatives**

Due to their nature, OTC derivatives are usually traded on a principal ("risk") basis rather than on a trading venue. However, in some instances regulations require that certain derivatives will be traded on a Swap Execution Facility ("SEF") where we are trading for a US client or with a US counterparty. We will utilise the SEF offered by one of the market platform operators for these trades.

For bespoke OTC derivatives, such as risk premia strategies packaged as a TRS, Newton Dealers will work with the portfolio manager who has agreed terms with the market maker and place the trade with that counterparty; depending on liquidity, the trade will be executed over the following days and a final price provided, which is then checked as far as possible to its component terms and verified with the portfolio manager.

For more generic OTC derivatives, including (but not limited to) interest rate swaps (IRS), relative variance swap trades, credit default swaps (CRS), including credit default swaps on a basket of bond issuers ("CDX"), and which are of standard market size, we will follow our customary trading process of asking at least two counterparties with whom we have the required legal documentation in place to price the instruments in competition, and then selecting the counterparty with the most favourable price, except where in our assessment working with a single counterparty reduces the market impact and signalling risk in exposing our trading intentions more widely.

The diagram below shows the relative importance that Newton generally places on the execution factors when executing other (i.e. non-FFX) OTC derivatives trades. These can vary according to liquidity, urgency and volatility but we will generally use **size** followed by **price** and **settlement and execution** as our leading execution factors for this asset class.



## F. Structured Finance Instruments

Due to the illiquid and OTC nature of these financial instruments, cost and nature of the order will be prioritised alongside price as the primary criteria to obtain the best possible result. Structured Finance Instruments are fixed term products with no secondary market. Given the restricted market, with one market maker for each product, Structured Finance Instruments trading, by definition, takes place with the issuers' market maker.

The assessment of price is a collaborative process through the portfolio manager and the Newton Dealer to check the prices provided by the market maker against the components of the product and market movements before execution. Newton will challenge prices that fall outside this assessment. Where the market maker fails to make a price the instruction will not be executed until a price is provided.

The diagram below shows the relative importance that Newton generally places on the execution factors when executing a structured finance instrument trade. These can vary, but as above, we will generally use price and nature of the order as our leading execution factors for this asset class.

# EXECUTION VENUES

In transacting an order, we will only use a counterparty or market maker that has been approved in accordance with our counterparty approval process which governs the review, approval and monitoring of each counterparty or market maker with whom we trade. The counterparty approval process is overseen by Newton's Counterparty Risk Oversight Group.

The performance of each approved counterparty or market maker is subject to periodic monitoring and review, which includes consideration of a range of matters including execution and settlement capability, execution rates (where applicable), credit quality, and effectiveness of previous executions.

Eligible counterparties or market makers for the purposes of an order will be limited to those counterparties or market makers that have been approved as described above and provided that, for OTC financial instruments, an appropriate International Swaps and Derivatives Association Master Agreement, Global Master Repurchase Agreement or similar legal agreement is in place.

This execution policy includes, for each class of financial instrument in which we execute orders on behalf of our clients, information on the different venues where we execute orders. These venues are listed in Appendix A.

# FACTORS AFFECTING THE CHOICE OF EXECUTION VENUE

Subject to any specific instructions that may be given by clients, Newton will execute an order by one of the following methods or combination of methods:

- on a regulated market, multilateral trading facility (MTF), an organised trading facility (OTF), or a systematic internaliser;
- outside of a regulated market or MTF where Newton has obtained the client's prior express consent

The factors affecting the choice of execution venue will have due regard to the intent of the portfolio manager who has initiated the order, and who may transmit certain parameters to the order for the Newton dealers (as a distinct function from the portfolio managers) to observe. Portfolio managers may set a price limit on trades but are prohibited from directing a dealer to use a particular venue. The Newton dealer's choice of execution venue will be in the main dictated by an assessment of prevailing market conditions allied with the knowledge of the portfolio manager's intent for the trade.

Generally, Newton will look to minimise the transaction costs associated with any given trade in order to preserve the value of the investment decision.

When Newton places orders with an affiliated entity, it will rely on that entity's execution policy to achieve best execution, provided that the Firm is satisfied that the affiliate's policy enables compliance with applicable regulatory requirements. Newton remains responsible for oversight and monitoring of the execution quality to ensure Newton meets its own obligations under MiFID II. Counterparties used for passive strategies are listed in Appendix.

# SELECTION AND MONITORING PROCESS FOR EXECUTION VENUES

Our policy is to maintain a choice of venues and counterparties that provide the basis for Newton to consistently obtain the best possible result for the execution of client orders on a consistent basis. Although ultimately owned by The Bank of New York Mellon Corporation, Newton has full flexibility to select trading execution venues on the basis of best execution.

Our policy is to avail ourselves of an optimal number of trading venues and entities for equity trades and to select one or more of these venues which we believe is appropriate to the trade, determined on a trade-by-trade basis.

Examples of venues or entities that we might access include:

- brokers which transact on our instruction on regulated markets, through their own MTF or as a systematic internaliser (either on a principal basis, using their own capital to facilitate our orders, or on an agency basis, working the orders against market liquidity). This may include BNY affiliates who execute orders on an agency basis for BNY Index Investments.
- other independent MTFs where trades can be executed away from the exchange order books;
- other non-broking firms which act in the capacity of systematic internaliser and which can provide liquidity in circumstances where we need to consume it, or

In order to keep trading costs to a minimum, we aim to identify venues which are sources of natural liquidity before entering an order into the market. If natural liquidity does not exist for our order, we use market information and our dealers' experience to select a broker to execute the order for us on an agency basis, being careful not to expose too much of our order to the market in order to avoid impact costs. This is a general strategy adopted when speed is a less important factor than, say, price or the ability to retain anonymity.

# EXECUTING ORDERS OUTSIDE A TRADING VENUE

On occasion Newton may execute an order outside a trading venue, for example bilaterally with a counterparty. These transactions will be performed solely with counterparties which have passed the necessary requirements to reside on the Newton approved counterparty list, where the attendant criteria include a careful and risk-based assessment of credit and counterparty risk.

# SPECIFIC INSTRUCTIONS

Our ability to achieve the best possible result, and hence our obligation to do so, will be limited in cases where we are following a specific instruction from our clients when placing an order with another entity for execution. Specific client instructions may prevent Newton from taking the steps it has designed and implemented to obtain the best possible result for execution.

Where we receive specific instructions from a client in relation to every aspect of a transaction, such that we have no discretion over how an order is executed, we will execute so far as reasonably possible the transaction in accordance with those instructions.

Where we receive specific instructions from a client in relation to any aspect of a transaction (for example, where the client instructs us to execute the order on a particular venue, at a particular time or at a particular price), Newton must execute the transaction in accordance with such instructions. By doing so, we will satisfy our obligation to provide best execution in relation to that aspect of the order.

# ORDER AGGREGATION AND ALLOCATION

**This following section does not apply to any orders executed on behalf of BNY Index Investments.**

## Aggregation

Recognising that Newton has a team-based approach for significant investment ideas, we operate a Material Change Notification process, where all portfolio managers are immediately sent an alert in the investment management system about any order that arrives with the Newton Dealers containing a change in portfolio positioning, for any funds contained within the order, above a defined threshold. All orders, regardless of their materiality, follow the aggregation protocol outlined below. To minimise the potential for any order participants to be disadvantaged by aggregation, instructions received for the same security in the same direction are aggregated into a single order unless any of the following criteria are met:

- local market or regulatory requirements mean that aggregation is not possible;
- the original order has been fully executed;
- the order is for spot FX and the order participant's custodian is not a Newton-approved counterparty; or
- the orders do not follow the same trading strategy (for example limit orders cannot be combined with non-limit orders).
- small trades are submitted which are to meet cash flow requirements, under certain pre-defined criteria

If an instruction is to be aggregated with an order that has already been initiated and has been partially executed, the proceeds or securities from the partial execution are first allocated to the original order participant(s) promptly prior to the aggregation of the subsequent instruction with the residual balance. This ensures that any subsequent orders cannot benefit from, or be disadvantaged by, any market movements that may have occurred since the original order was received.

Each order participant receives the average price obtained during the time in which they were part of the aggregated order.

## Trade co-ordination

Newton's active equity business operates a global internal research policy with its US affiliate which allows for internally generated research to be shared with its US affiliate, Newton Investment Management North America (NIMNA). Due to its different operating models, all trades placed by NIMNA will continue to be executed by its trading team independently from Newton's trading team for the foreseeable future.

Newton recognises that although each firm acts independently in the execution of trades, both firms and their investment teams will leverage the same research recommendations and capabilities. As a result, there is a possibility that the same trade could be executed simultaneously by Newton and NIMNA. In highly liquid securities, such independent simultaneous trades are unlikely to materially detriment the outcome for clients of Newton and NIMNA. However, this may not be the case for highly illiquid securities.

All client trades will be subject to each of their firm's Trading and best execution policies and oversight procedures to ensure that potential and actual conflicts of interest and risks are appropriate managed. However, Newton have adopted a synthetic trade co-ordination approach as a pre-trade control which notifies Newton dealers in London and its affiliate NIMNA dealers in the US when they are trading in the same stock in the same direction above a pre-agreed combined liquidity threshold.

All dealers will then take all steps necessary to co-ordinate execution between them to optimise the market participation of the trades to avoid price impact and ensure fair allocation between both sets of client executions.

## Allocation

**A. Allocation of fully completed orders**

Once an order has been fully completed (fully executed in the market), the proceeds or securities are promptly allocated in full to all order participants. Typically, this would occur within two hours of the order completion or 'open period' finishing, if during normal office hours, or promptly the following morning if completed outside of normal office hours.

**B. Allocation of partially completed orders**

Where it has not been possible to fully complete an order by the end of the trading day, the partial execution is allocated promptly to each order participant (a 'partial allocation'). Typically, this would occur within two hours of the close of the relevant market if during normal office hours, or promptly the following morning if completed outside of normal office hours. The residual balance of the order is held over for the next trading day. Allocations are made on a pro-rata basis for equities, derivatives, collective investments, and currencies.

For fixed income, in relation to both buy and sell orders, allocations are made on a pro-rata basis unless this would leave a participant with a position which does not meet the minimum piece size. Where this occurs, the balance forms a 'residual allocation balance' which is allocated to order participant(s) (selected on a random basis) which did meet the minimum piece size based on their pro-rata allocation.

# MONITORING AND OVERSIGHT REVIEW

Newton's Dealing Oversight Group monitors the effectiveness of execution arrangements that are described in this document (including the order execution policy itself) and the scope of the best execution obligation. It also assesses whether the execution venues that we have selected provide the best possible result for client transactions that are subject to best execution

We will review this order execution policy and our order execution arrangements at least annually. We will monitor the effectiveness of our order execution arrangements at least annually and assess on a regular basis whether the execution venues we have selected provide for the best possible result for orders we execute. We will also review and make any modifications required to this policy, including the relative importance of the best execution factors.

Changes to this policy may be communicated via our website newtonim.com and we will also periodically notify you of any material changes to our order execution arrangements or this order execution policy. (The addition or removal of a broker from our approved counterparty list would not typically be deemed a material change.)

# APPENDIX

## List of execution venues
(non-exhaustive and subject to change):

### Equity and fixed income

| Venue | Primarily used for |
|---|---|
| ABG Sundal Collier Partners LLP | Equity |
| ANZ Bank (Europe) Ltd | Fixed income |
| Banco Santander | Fixed Income |
| Bank of Montreal | Fixed Income |
| Bank of America | Equity and fixed income |
| Barclays Capital Securities Limited | Equity and fixed income |
| Barrenjoey Markets Pty Limited | Equity and fixed income |
| Berenberg, Gossler and Co | Equity |
| Bernstein Limited | Equity |
| BGC Partners Inc | Fixed income |
| BMO Capital Markets | Equity |
| BNP Paribas | Fixed income |
| BTIG Limited | Equity |
| Canaccord Genuity Limited | Equity |
| Commonwealth Bank of Australia | Fixed Income |
| Canadian Imperial Bank of Commerce London | Fixed income |
| Cantor Fitzgerald Europe | Equity and fixed income |
| Citigroup Global Markets Limited | Equity and fixed income |
| CLSA (UK) | Equity |
| Daiwa | Equity and fixed income |
| Deutsche Bank AG | Equity and fixed income |
| DNB Bank ASA | Fixed income |
| Flow Traders | Equity |
| Goldman Sachs International | Equity and fixed income |
| Goodbody | Equity |
| HSBC Bank Plc | Equity and fixed income |
| ING Bank N.V | Fixed income |
| Instinet Europe Ltd | Equity |
| Investec Bank PLC | Equity |
| J & E Davy | Equity |
| J P Morgan Securities PLC | Equity and fixed income |
| Jane Street | Equity and fixed income |
| Jefferies International Ltd | Equity and fixed income |
| Kepler Cheuvreux | Equity |
| Liquidnet Europe Limited | Equity and fixed income |
| Lloyds Bank PLC | Fixed income |
| Macquarie Capital (Europe) Limited | Equity |
| MarketAxess Europe Limited | Fixed income |
| Mizuho International PLC | Equity and fixed income |
| Morgan Stanley & Co International Limited | Equity and fixed income |
| National Australia Bank Ltd London Branch | Fixed income |
| NatWest Markets Plc | Fixed income |
| Nomura International Plc | Fixed income |

| Venue | Primarily used for |
|---|---|
| Oddo BHF | Equity |
| Oppenheimer | Fixed income |
| Optiver | Equity |
| Panmure Liberum | Equity |
| Pareto Securities | Fixed income |
| Peel Hunt LLP | Equity |
| RBC Capital Markets Ltd | Equity and fixed income |
| Rothschild & Co Global Markets Solutions Limited | Equity |
| Societe Generale | Equity and fixed income |
| Shore Capital Stockbrokers Limited | Equity |
| Societe Generale | Equity and fixed income |
| Singer Capital Markets Limited | Equity |
| Skandinaviska Enskilda Banken | Fixed income |
| Societe Generale | Equity and fixed income |
| Stifel Financial Corp | Fixed income |
| Sun Global Investments Limited | Fixed income |
| Susquehanna International Group | Equity |
| Toronto Dominion Bank | Equity and fixed income |
| UBS Limited | Equity and fixed income |
| Unicredit | Fixed income |
| Virtu Financial | Equity |
| Wells Fargo Securities International Limited | Equity and fixed income |
| Westpac Banking Corporation | Fixed income |
| Winterflood Securities Limited | Equity |

## Foreign exchange (FX)

| Venue | Primarily used for |
|---|---|
| Bank of America | Spot and forward FX |
| Bank of New York Mellon SA/NV Brussels | Third-party FX |
| Barclays | Spot and forward FX |
| BNP Paribas | Spot and forward FX |
| Citibank N.A. | Spot and forward FX |
| HSBC | Spot and forward FX |
| JP Morgan | Spot and forward FX |
| NatWest Markets plc | Spot and forward FX |
| Standard Chartered Bank | Spot and forward FX |
| State Street Bank and Trust Company | Spot and forward FX |
| UBS | Spot and forward FX |

### Multilateral trading facilities (MTFs)

The following MTFs are used by Newton as at the date of this policy:

| | |
|---|---|
| **Bloomberg MTF** | FXall |
| **FX Connect** | POSIT Alert |
| **Liquidnet** | MarketAxess |
| **Tradeweb** | BIDS |

**Exchange-traded derivatives**

Newton has dealing relationships with the following counterparties:

| | | |
|---|---|---|
| **(a)** | **Clearing** | UBS Ltd |
| | | J. P. Morgan |
| **(b)** | **Execution** | Bank of America |
| | | Barclays Bank |
| | | BNP Paribas |
| | | Citigroup |
| | | Deutsche Bank |
| | | Goldman Sachs International |
| | | HSBC |
| | | J. P. Morgan |
| | | Jane Street |
| | | Morgan Stanley & Co International plc |
| | | Societe Generale S.A. |
| | | UBS Ltd |
| | | Virtu Europe |

**Over-the-counter (OTC) derivatives**

These are counterparties with whom we have agreements in place to trade OTC Derivatives:

| |
|---|
| Bank of America |
| Bank of Montreal |
| Barclays Bank PLC |
| BNP Paribas |
| Canadian Imperial Bank of Commerce |
| Citigroup Global Markets |
| Deutsche Bank |
| Goldman Sachs |
| HSBC Bank PLC |
| J P Morgan Securities |
| Lloyds Bank Corporate Markets |
| Mizuho International |
| Morgan Stanley and Co International |
| NatWest Markets PLC |
| Nomura International PLC |
| Skandinaviska Enskilda Bank AB |
| Societe Generale S A |
| Toronto Dominion Bank |
| UBS AG |
| Westpac Banking Corporation |
| Wells Fargo Bank |

**Indexing Strategies managed by BNY Index Investments**

Pershing Securities Limited (trading as Buy-side Trading Solutions UK)

BNY Mellon Capital Markets, LLC (trading as Buy-side Trading Solutions US)

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