

MARINER INVESTMENT (EUROPE) LLP
(LEI: 549300E0NL6C1FCY6O52)
(the “Firm”)

MiFID BEST EXECUTION DISCLOSURES
1 JANUARY 2020 TO 31 DECEMBER 2020

Before the Firm provides investment services for its Clients, it is important that the Clients of the Firm
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Before the Firm provides investment services for its Clients, it is important that the Clients of the Firm understand how the Firm will execute transactions. The following information is a summary of the Firm’s Best Execution Policy, which is designed to provide its Clients with a general understanding of the Firm’s typical dealing arrangements for different instrument types and the execution venues that the Firm utilizes. This information should not, however, be seen as a prescriptive statement of the method by which a particular order must, or will, be dealt with.

Best execution involves the Firm taking all sufficient steps to obtain the best possible result for the Clients’ transaction(s). This result can be measured by a number of execution factors though, for retail clients, it is defined in terms of “total consideration”, comprised of price, costs (including execution venue fees), clearing and settlement fees, as well as any other fees paid to third parties involved in the execution of the order. Costs may be excluded, however, to the extent attributable to differences in the nature of the services that the Firm provides to its Clients.

**The Firm’s Typical Dealing Arrangements for
Different Types of Investment Debt Securities (or “bonds”)**

The debt market in some locations is not centrally organised, and for many non-government issues, is not a liquid market. In these circumstances, the majority of debt issues or bonds must be dealt manually in order to identify current traders in the security concerned. If liquidity is available and a price comparison made for the size of trade concerned, the Firm will route the order to the counterparty which provides the most competitive overall pricing.

Over the Counter Products

Over the counter products are products that are traded other than on a formal exchange (for example structured products or foreign exchange). Over the counter products are dealt either directly between the Firm and its Client, or may be sourced via a third party. The order routing process will depend firstly on the execution factors. Further issues that may affect the order process include the following:

- For bespoke, highly negotiated transactions or for those which may be original trading ideas or for which the Firm has a duty of confidentiality to the originating firm, the Firm will route such orders exclusively to the originating firm since there will be no other available market liquidity within a reasonable timeframe; and
- For some more standardised products, the Firm will usually select and price poll from a shortlist of dealing counterparties identified by the Firm to be among the most competitive in the field concerned.

Foreign Exchange (or FX)

The FX market is wholly over the counter and off exchange across all FX products. Under normal market conditions, the Firm will generally execute with a primary FX counterparty using electronic trading tools. In the event that the Firm cannot execute electronically, it will execute manually. In certain circumstances and product types, the Firm will also use other FX counterparties to fulfil its best execution obligations.

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Execution Factors

The Firm will take all sufficient steps to obtain the best possible result for its clients taking into account the following execution factors:

- Price;
- Costs;
- Speed;
- Likelihood of execution;
- Settlement;
- Order size;
- Nature;
- Venue; and
- Any other relevant consideration.

The Firm need not obtain the best possible results for its Clients on every single occasion; rather, it will on an ongoing basis verify that the execution arrangements it has established work satisfactorily throughout the different stages of the order execution process. The Firm will take all appropriate remedial actions if any deficiencies are detected in order to achieve the best possible results for its Clients.

In the majority of cases, the Firm would typically expect that the most significant issue to be taken into account will be the total consideration to be paid or received. However, there will be occasions when other factors may be more important or relevant and, as discretionary managers, the Firm may use its judgement and experience to give greater prominence to execution factors other than price, based on one or more of the criteria set forth above.

Execution Venues

Primarily, brokers and venues are selected based on their ability to meet the best execution factors listed above. The Firm utilizes the list of approved brokers maintained by its parent company, Mariner Investment Group, LLC.

Reporting

The Firm will publish reports on an annual basis of the top five investment firms in terms of trading volumes where it transmitted or placed client orders for execution in the preceding year and the information on the quality of execution obtained and take account of that information and information published by execution venues on execution quality in their policies on best execution. This information is available on the Firm's website, www.marinerinvestment.com. The reports will be accessible for a period of 2 years.

The top five investment firms in terms of trading volume for calendar year 2020 for applicable asset classes are set forth below. Asset classes of which the Firm did not have any trading activity in the applicable year have been omitted from the report.

Class of Instrument	Debt Instruments - Bonds				
Notification if <1 average trade per business day in the previous year	No				
Top five 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 traded 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# K6Q0W1PS1L1O4IQL9C32)	33%	n/a	n/a	n/a	n/a
BNP Paribas (LEI# R0MUWSFPU8MPRO8K5P83)	20%	n/a	n/a	n/a	n/a
HSBC Bank PLC (LEI# MP6I5ZYZBEU3UXPYFY54)	20%	n/a	n/a	n/a	n/a
BGC Brokers LP (LEI# ZWNFQ48RUL8VJZ2AIC12)	6%	n/a	n/a	n/a	n/a
Goldman Sachs International (LEI# W22LROWP2IHZNBB6K528)	4%	n/a	n/a	n/a	n/a

Class of Instrument	Interest Rate Derivatives – Futures and Options admitted to trading on a venue				
Notification if <1 average trade per business day in the previous year	No				
Top five 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 traded as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
BNP Paribas (LEI# R0MUWSFPU8MPRO8K5P83)	48%	n/a	n/a	n/a	n/a
J.P. Morgan Securities Plc (LEI# K6Q0W1PS1L1O4IQL9C32)	36%	n/a	n/a	n/a	n/a
HSBC Bank PLC (LEI# MP6I5ZYZBEU3UXPYFY54)	7%	n/a	n/a	n/a	n/a
BGC Brokers LP (LEI# ZWNFQ48RUL8VJZ2AIC12)	3%	n/a	n/a	n/a	n/a
Societe Generale (LEI# O2RNE8IBXP4R0TD8PU41)	2%	n/a	n/a	n/a	n/a

Class of Instrument	Interest Rate Derivatives - Swaps, forwards, and other interest rates derivatives				
Notification if <1 average trade per business day in the previous year	No				
Top five 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 traded as a percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Merrill Lynch International (LEI# GGDZP1UYGU9STUHRDP48)	27%	n/a	n/a	n/a	n/a
J.P. Morgan Securities Plc (LEI# K6Q0W1PS1L1O4IQL9C32)	23%	n/a	n/a	n/a	n/a
UBS AG (LEI# BFM8T61CT2L1QCEMIK50)	16%	n/a	n/a	n/a	n/a
Goldman Sachs International (LEI# W22LROWP2IHZNBB6K528)	15%	n/a	n/a	n/a	n/a
Barclays Bank plc (LEI# G5GSEF7VJP5I7OUK5573)	6%	n/a	n/a	n/a	n/a

Please note that this data relates to Mariner Investment (Europe) LLP only and does not reflect the trading activity of any other Mariner Investment Group entity. Past trading activity should not be taken as an indicator of future trading activity.

In connection with the data provided above:

- Insufficient data is available to comment on the relative importance given to the applicable execution factors (or any other consideration) when assessing the quality of execution for the period in question.
- To the best of the Firm's knowledge, there are no close links, conflicts of interests and common ownerships with respect to any execution venues used to execute orders.
- To the best of the Firm's knowledge, there are no specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received.
- Changes in execution venues occur from time to time in light of factors such as, without limitation, the evolution of commercial terms, the scope of financial instruments traded and available to be traded, and determinations of the overall performance and competitiveness of the relevant execution venue.
- The Firm only executes transactions in financial instruments for professional clients and, therefore, order execution does not change according to different client categorisations.
- During the period in question, the Firm has not utilised the output of a consolidated tape provider, as there were no such CTPs available in Europe during the period to which this disclosure relates.
- During the period in question, and as part of the Firm's best execution monitoring procedures, we have considered the data published under Commission Delegated Regulation (EU) 2017/575 by the trading venues we have utilized, those of our counterparties which operate as systematic internalisers, and a sample of reports published by other execution venues which the Firm does not currently utilise in order to assess the quality of execution achieved for the relevant period..
- Percentages have been rounded to the nearest whole number.

Additional Information

Where a Client makes reasonable and proportionate requests for information about the Firm's policies or arrangements, and how they are reviewed by the Firm, the Firm will respond appropriately within a reasonable time.