Annual qualitative disclosure on the quality of execution obtained

Firm name: Baker Steel Capital Managers LLP

Disclosure Period: 01/01/2020 to 31/12/2020

This disclosure is being made pursuant to Article 3(3) of RTS 28 and/or Article 65(6) of the MiFID II Delegated Organisational Regulation, which require firms to disclose, for each class of financial instruments traded for clients during the period, a summary of the analysis and conclusions drawn from the execution quality monitoring that the Firm has undertaken.

This disclosure covers the following classes of financial instruments that were traded during the period. As an equity long manager, the primary instruments traded were equities.

Classes of Financial Instrument traded during the period	Comments
(a) Equities – Shares & Depositary Receipts	
(i) Tick size liquidity bands 5 and 6 (from 2000 trades per day)	Yes
(ii) Tick size liquidity bands 3 and 4 (from 80 to 1999 trades per day)	Yes
(iii) Tick size liquidity band 1 and 2 (from 0 to 79 trades per day)	Yes

The table(s) below covers Baker Steel Capital Managers LLP analysis for each of the relevant class of financial instruments:

1) Class of Financial Instrument: Equities_____

RTS 28 / Art. 65(6) requirement:	Details:
(a) an explanation of the relative importance the firm 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;	The initial priority is to assess which brokers are capable of executing the order on the required terms. In normal market conditions, this is a relatively straightforward exercise that will produce a range of equally ranked execution options for further consideration under the remaining execution factors. Following this, and assuming a range of execution options exist, the highest priority factor is to obtain the best result for the client in terms of the total consideration for the trade, defined as the total price obtained minus any costs or fees. This will either be the highest total price or the lowest total price (net of costs and fees) depending on the direction of the trade. In most situations this will be determined predominantly by the price achieved, although where the price offered by two or more brokers are identical or within a narrow range, or cannot be reliably determined in advance, then the one with the lowest overall cost of execution will be chosen. This analysis will include the implicit costs of the trade, such as slippage and market impact.
(b) a description of any close links, conflicts of interests, and common ownerships with respect to any execution venues/brokers used to execute orders;	The Firm does not have any close links, common ownership of other relationships that would give rise to any conflicts of interests with any of the execution venues or brokers used.
(c) a description of any specific arrangements with any execution venues/brokers regarding payments made or received, discounts, rebates or non-monetary benefits received;	The Firm has no specific arrangements to report with any execution venues or brokers regarding payments made or received, discounts, rebates or non-monetary benefits received.
(d) an explanation of the factors that led to a change in the list of execution venues/brokers listed in the firm's execution policy, if such a change occurred;	The Firm's internal list of execution venues / brokers approved for use by the Firm did not change materially during the period.
(e) an explanation of how order execution differs according to client categorisation, where the firm treats categories of clients differently and where it may affect the order execution arrangements;	This is not applicable as the Firm only deals with Professional Clients.

(f) an 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.	This is not applicable as the Firm does not deal with Retail Clients.
(g) an explanation of how the investment firm has used any data or tools relating to the quality of execution, including any data published under Delegated Regulation (EU) 2017/575 [RTS 27];	The Firm uses price feed data to establish market prices and intra-day ranges to perform its execution quality analysis. The Firm did not use RTS 27 reports or RTS 28 reports produced by execution venues or brokers during the period under review (2020).
(h) where applicable, an explanation of how the investment firm has used output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU.	The Firm has not used the output of any Consolidated Tape Providers in its execution quality analysis. It is noted that there were not any authorised Consolidated Tape Providers in Europe during the period under review.
Disclosures around the use of Direct Electronic Access ("DEA") providers.	Of the top 5 brokers disclosed all were DEA providers. Trades are generally not directed to any specific Execution Venue, being left to the discretion of the broker.
Summary of Analysis	The ongoing monitoring of execution quality and controls are undertaken by our trading desk and individual traders/portfolio managers. The trading desk are therefore primarily responsible for ex ante and ex post monitoring of best execution on an ongoing basis, with oversight of this monitoring undertaken by senior management by way of the Broker & Research Committee.
Summary of Conclusions	On average, execution fees of 7 bps were paid over the period on equity trades. Analysis of intra-day prices ranges / VWAP revealed that over 95% of trades were executed within the intraday range, with outliers being investigated and feeding into future broker selection. The Firm is comfortable that its execution policy was adhered to over the period, and that following this policy has delivered best execution for its clients over the period. This analysis will feed in to the Firm's annual review of its execution policy at which time further enhancements will be considered.