



Qualitative Data for the Purpose of RTS28/Art 65(6)

Reports for the period

01 January 2021 to 31 December 2021

Requirement Article 3(3):

'Investment firms shall publish, for each class of financial instruments, a summary of the analysis and conclusions they draw from their detailed monitoring of the quality of execution obtained on the execution venues where they executed all client orders in the previous year'

Lawsons Equity Limited Licence (LAWS-IF-1950) provides the firm permissions for Investment Advice and Reception and Transmission of orders in relation to one or more financial instruments.

As an Investment Advisory firm, Lawsons Equity Limited will receive from clients BUY or SELL orders in the form of Dealing Instructions and will pass on these instructions to an investment platform or product provider for order execution.

MiFID II requires investment firms to summarise and make public on an annual basis for each class of financial instrument, the top five execution venues in terms of trading volumes where client orders were executed in the preceding year and information on the quality of execution obtained. Such annual reports are issued separately for Retail and professional clients.

For clarity, as a firm Lawsons Equity Limited are regulated to provide the investment service of reception and transmission of orders on behalf of clients and these reports are to confirm the top five entities to which client orders were routed during the relevant period. Further information can be found in the Client Order Execution Policy.

These reports are updated annually and are published each year by the 30 April and made available to the public for download on www.lawsonsequity.com for a period of 2 years.

The following commentary confirms the position of Lawsons Equity Limited for the reporting period
01 January 2021- 31 December 2021

(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;

As Investment Advisors Lawsons Equity Limited consider the 'Total Price Consideration' for both retail and professional clients.

This is an aspect that is monitored on a monthly basis to ensure that the Product Providers,

	<p>Investment Platforms and Financial Instruments that are approved by the Investment Committee and used by our IFAs in client suitability recommendations, have a good solid performance and a reasonable Total Consideration Price.</p> <p>The Total Consideration Price includes the price of the financial instrument and the costs relating to execution, which includes all expenses incurred by the client which are directly relating to the execution of the order, including execution venue fees, clearing and settlement fees and any other fees paid to third parties involved in the execution of the order</p> <p>The proven experience of the Product or Platform for the execution is also important to us as is the standard of the administration service and the guaranteed trading standard turnaround times.</p> <p>The competencies of the Product or Platform Provider are always considered as this reflects in the service Lawsons Equity gives to its clients.</p>
<p>(b) A description of any close links , conflicts of interest, and common ownerships with respect to any execution venues used to execute orders;</p>	<p>Lawsons Equity Limited does not have any close links, common ownership or arrangements concerning rebates with respect to any execution venue used to execute orders.</p> <p>In addition, the inducement rules prohibit investment firms from receiving inducements (other than acceptable minor non-monetary benefits) in relation to those services.</p>
<p>(c) A description of any specific arrangements with entities 'Brokers' regarding payments made or received, discounts, rebates or non-monetary benefits received;</p>	<p>Lawsons Equity Limited monitors non-monetary benefits and requires pre-clearance of gifts and entertainment above certain thresholds to ensure that the firm is not induced to use one execution venue over another.</p> <p>Lawsons Equity Limited operate on a fee based structure for Investment Advisory services and operate on a whole of the market basis. This allows the firm discriminate between execution venues and can make fair choices when selecting the best execution venues of the firm.</p>

	<p>The Company has no specific arrangements with execution venues or third party executing brokers regarding fee schedules, fee discounts, rebates or non-monetary benefits. Standard agreements are in place. Decisions to route orders to a particular execution venue is driven primarily by the Total Consideration Price</p> <p>Minor non-monetary benefits must be of a scale and nature that could not be judged to impair Insight's compliance with its duty to act honestly, fairly and professionally in the best interests of the client</p> <p>It is confirmed that there were no non-monetary benefits received to the firm in the reporting period</p>
<p>(d) An explanation of the factors that led to a change in the list of 'Brokers' listed in the firm's execution policy, if such change occurred;</p>	<p>In this regard Lawsons Equity considers the investment providers and product providers as its 'execution brokers' and there was no change in execution brokers for the period under report.</p> <p>However should Lawsons Equity need to consider a new broker this would be based on the following factors:</p> <ul style="list-style-type: none"> - Liquidity - Strong and robust jurisdiction - Licensing in order - Good diversification - Likelihood of execution and settlement - Zero fees in and zero fees out to the client <p>It is to be noted that as the firm operate as investment advisors for the execution of trades the investment platforms or product providers who provide the end execution may have made their own changes during this reporting period.</p>
<p>(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;</p>	<p>Lawsons Equity Limited does not treat clients any differently regardless of classification. We follow a consistent approach across our client base whilst ensuring we comply with any client specific regulation.</p>

<p>(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;</p>	<p>Lawsons Equity will also take into consideration the service received and demonstrated. If this was known to be poor then Lawsons Equity would not make use of that service as otherwise this would mean that Lawsons Equity would be giving a poor service to its clients.</p>
<p>(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];</p>	<p>The firm monitors the quality of the third party execution brokers and takes samples of client transactions to cross reference prices and settlement periods on contract notes in order to determine the quality of each execution broker.</p>
<p>(h) Where applicable, an explanation of how the investment firm has used output of a consolidated tape provider.</p>	<p>As this is not applicable to Lawsons Equity the firm has not made use of a consolidated tape provider.</p>