

Quality of Execution Report

Equities – Shares & Depository Receipts – Tick size liquidity bands 3 and 4 (from 80 to 1999 trades per day)

Period covering 1 January 2021 – 31 December 2021

Investment Service - Portfolio Management/Reception and Transmission Professional Clients

Class of Instrument	Equities - Shares & Depository Receipts - Tick size liquidity bands 3 and 4 (from 80 to 1999 trades per day)				
Notification if < 1 average trade per business day in the previous year	N				
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 executed as percentage of total in that class	Percentage of Passive orders	Percentage of Aggressive orders	Percentage of Directed orders
Bank of America Securities Inc. - 549300HN4UKV1E2R3U73	94.13	63.63	100.00	0.00	0.00
CITIGROUP GLOBAL MARKETS INC. - MBNUM2BPBDO7JBLYG310	1.60	10.04	100.00	0.00	0.00
GOLDMAN SACHS & CO. LLC (EQUITY) - FOR8UP27PHTHYVLBNG30	1.42	7.08	100.00	0.00	0.00
JP MORGAN SECURITIES LLC (EQUITY)- - ZBUT11V806EZRVWT807	0.63	3.44	100.00	0.00	0.00
JEFFERIES LLC (EQUITY) - 58PU97L1C0WSRCWADL48	0.57	1.62	100.00	0.00	0.00

Notes:

- The reporting period covered is from 1 January 2021 to 31 December 2021
- Class of Instrument (Equities - Shares & Depository Receipts) contains ownership in a corporation and represents a claim on a part of the corporation's assets and earnings
- Notification of < 1 average trade per business day in the previous year is indicated with 'Y' for 'Yes' where there was less than 1 trade on average per business day in 2021. 'N' indicates 'No' there was more than 1 trade on average per business day
- Tick size liquidity bands 3 and 4 includes trades with an ADNT (average daily number of trades) between 80 and 1999 trades per day. Securities in this band will range from illiquid to more liquid, depending where they fall in daily trading volumes

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Portfolio Management / Reception and Transmission

Neuberger Berman Asset Management Ireland Limited (NBAMIL) has published for each class of financial instrument, that it has either traded in or placed with a counterparty for execution, a summary of its analysis and the conclusions drawn from detailed monitoring of the quality of execution obtained for all client orders during 2021.

The following qualitative information is a summary analysis based on NBAMIL, and relevant Neuberger Berman group affiliates, detailed ongoing monitoring of execution quality for **Equities** including **Shares & Depository Receipts – Tick size liquidity bands 3 and 4 (from 80 to 1999 trades per day)**.

Requirement	
A. an explanation of the relative importance NBAMIL and its group affiliates 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;	<p>The relative importance of each of these factors within Neuberger Berman’s equity dealing process will vary depending upon a number of criteria, namely:</p> <ol style="list-style-type: none">1. the investment intent of the investment manager who created the order at NBAMIL;2. the characteristics of financial instruments that are the subject of that order; and3. the characteristics of the execution venues to which that order can be directed <p>Each client order that is transacted by NBAMIL or any other affiliate traders, is inherently unique in its characteristics and market conditions are never constant. The relative importance of the execution factors is therefore variable. That said, the particular combination of total consideration (price of the instrument and costs of execution, both implicit and explicit) and size are usually the most considered factors when setting our execution strategy. When an instrument is less liquid, as some may be in this tick size band, the likelihood of execution becomes a more important consideration. Another factor relevant to best execution is counterparty risk, particularly in the case of instruments which are not settled by delivery versus payment. Under this scenario, NBAMIL’s assessment of credit risk may impact on the selection of who we trade with.</p>

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Requirement	
<p>B. description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders;</p>	<p>NBAMIL and/or any other Neuberger Berman group affiliates do not trade with or have any close links or common ownership with any execution venues or counterparties used to execute orders.</p>
<p>C. a description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or nonmonetary benefits received;</p>	<p>NBAMIL and/or any other Neuberger Berman group affiliates will not receive payments, discounts or rebates in its equity trading arrangements. Certain non-monetary benefits may be given and/or received by NBAMIL employees, but in all cases will comply with internal policies which deal with gifts/entertainment, and potential conflict of interest scenarios that may arise as a result.</p>
<p>D. an explanation of the factors that led to a change in the list of execution venues listed in NBAMIL's execution policy, if such a change occurred;</p>	<p>Having been initially approved, a counterparty will remain on NBAMIL's approved list of execution brokers and be subject to an ongoing monitoring process. This includes, but is not limited to, an assessment of creditworthiness and financial stability, a review of the execution services provided, and the counterparty's ability to trade effectively on our client's behalf. Each counterparty we use are dependent on their execution capabilities fitting the needs of a specific order, such as liquidity, market impact and certainty of execution. Counterparties will be removed from our list where they are found to be consistently delivering poor execution.</p> <p>Brokers will be added to the execution list based on desire to manage best execution as effectively as possible. The amount of flow directed to any one venue is fluid and depends on trader intuition on who can best facilitate a client trade.</p> <p>The majority of the trading activity is with Bank of American Securities Inc. While this broker did not appear in the top five Broker report last year, we have an existing relationship with Bank of America frequently utilizing their brokerage to trade Equities.</p>
<p>E. an explanation of how order execution differs according to client categorisation, where NBAMIL treats categories of clients differently and where it may affect the order execution arrangements;</p>	<p>All NBAMIL client orders are treated in the same way</p>

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Requirement	
<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>This is not applicable, as NBAMIL does not execute retail client orders.</p>
<p>G. an explanation of how NBAMIL has used any data or tools relating to the quality of execution, including any data published under Delegated Regulation (EU) 2017/575 – RTS27;</p>	<p>NBAMIL’s trade execution is reviewed as part of the Neuberger Berman Best Execution Committee’s oversight of execution quality. To complement this review, NBAMIL makes use of a third party independent TCA (transaction Cost Analysis) provider to assist with detailed monitoring of the quality of execution obtained across the counterparties and/or venues where NBAMIL executes and/or places client orders for execution. RTS27 reports are not used in any analysis to establish the quality of execution.</p>
<p>H. where applicable, an explanation of how NBAMIL has used output of a consolidated tape provider.</p>	<p>This is not applicable, as there are currently no consolidated tape providers in Europe providing this data.</p>

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