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# 2022 THIRD-PARTY INVESTMENT MANAGERS' TRADE EXECUTION PRACTICES

This document is directed towards clients who are participating, or are considering participating, in a wrap fee program ("Program") sponsored by Janney Montgomery Scott LLC ("Janney") that is managed by a third-party investment manager ("Investment Manager") and provides information regarding these investment managers' placement of client trade orders and their practices of "trading away" from Janney.

## **TRADING AWAY AND STEP-OUT TRADES**

The practice frequently referred to as "trading away" refers to trades that are executed at a broker-dealer other than a wrap program sponsor and cleared and settled by the program sponsor. These trades are frequently called "step-out" trades. In relation to a Program account, a step-out trade is a trade placed by an Investment Manager with a broker-dealer other than Janney and clear and settled at Janney.

## **BEST EXECUTION OBLIGATION**

Investment Managers that manage client accounts under a Program have investment discretion over your account which allows the Investment Manager to decide which securities to buy and sell in your account and place trade orders for such securities. As an investment adviser, an Investment Manager has an obligation to seek "best execution" of client trade orders which means the Investment Managers have full authority to execute trades with those broker-dealers that they believe are capable of providing the best qualitative execution under the circumstances. An Investment Manager may determine that Janney or another broker-dealer's execution capabilities provide the most favorable options under the circumstances. When an Investment Manager chooses to place a trade with Janney, Janney will act in its capacity as a broker-dealer, not an investment adviser, to execute the trade at the direction of the Investment Manager.

In complying with its best execution obligation, an Investment Manager typically reviews several factors that reflect on the quality of the trade execution of the broker-dealer. The Investment Manager may consider the full range and quality of a broker-dealer's services, including but not limited to the following factors: the nature of the security, the size and type of transaction, the nature and character of relevant markets, the executing broker's execution, clearance and settlement capabilities and its reputation, soft dollar arrangements, the importance of speed, knowledge, efficiency, consistency and anonymity provided by the executing broker and additional investment opportunities. Additional trading costs associated with "trading away," as described below, may be one of several factors the Investment Manager assesses when fulfilling its best

execution obligations. Each Investment Manager may consider different factors or may place different weight on the factors it uses to meet its best execution obligation. An Investment Manager's best execution obligation does not require the manager to solicit competitive bids for each transaction or to seek the lowest available cost of trade orders, so long as the manager reasonably believes that the broker-dealer selected can be reasonably expected to provide clients with the best qualitative execution under the circumstances.

## **TRADE AGGREGATION AND ROTATION**

Investment Managers may participate in other wrap fee programs sponsored by firms other than Janney. In addition, Investment Managers may manage institutional and other accounts not part of a wrap fee program. In order to avoid buying and selling the same security for all client accounts through multiple broker-dealers, the Investment Manager may decide to aggregate all such client transactions into a block trade that is executed through one broker-dealer. This practice may enable the Investment Manager to obtain more favorable execution, including better pricing and enhanced investment opportunities, than would otherwise be unavailable if orders were not aggregated. Using block transactions may also assist the Investment Manager in potentially avoiding an adverse effect on the price of a security that could result from simultaneously placing a number of separate, successive or competing client trade orders. However, as it pertains to Program clients, this practice may result in "trading away" from Janney.

Alternatively, an Investment Manager may utilize a trade rotation process where one group of clients may have a transaction effected before or after another group of the Investment Manager's clients. Investment Managers who implement their client trades using a trade rotation process do so in order to minimize the impact of their trading on the securities or markets in which they trade. A client should be aware that an Investment Manager's trade rotation practices may at times result in a transaction being effected for the client's account near or at the end of the manager's rotation and, in such event, the client's trade orders will significantly bear the market price impact, if any, of those trades executed earlier in the manager's rotation, and, as a result, the client may receive a less favorable net price for the trade. Nonetheless, trade rotation policies are typically designed to ensure that clients are treated equitably and fairly over time. Additional information regarding a particular Investment Manager's trade rotation policies, if any, is available in the manager's Form ADV Part 2A Brochure.

## COSTS ASSOCIATED WITH TRADING AWAY AND STEP-OUT TRADES

You will not pay additional trading costs when Janney executes a trade order in your Program account as broker-dealer. For this reason, the Investment Managers may determine that Janney's execution capabilities as broker-dealer provide the most favorable option for placing trade orders in your Program account. However, the Investment Managers may choose to execute trades with another broker-dealer if the managers reasonably believe another broker-dealer can obtain a more favorable execution under the circumstances. If the Investment Manager executes trade orders with a broker-dealer other than Janney, you may incur trading costs in addition to the fees charged to participate in the Program. The broker-dealer executing the transaction may charge additional fees, such as: commissions, markups, mark-downs or "spreads" paid to market makers. Additionally, if a foreign currency transaction is required, a foreign broker-dealer firm may receive compensation in the form of a dealer spread, markup or markdown. There may be other exchange or similar fees, including but not limited to foreign ordinary conversion and creation of American Depositary Receipts ("ADRs") charged by third parties as well as foreign tax charges. As a result, Investment Managers who trade away from Janney and their strategies could be more costly to a client than Investment Managers that primarily place client trade orders with Janney for execution. A client should review the Investment Manager's Form ADV Part 2A Brochure, inquire about the Investment Manager's trading practices, and consider that information carefully, before selecting an Investment Manager. In particular, the client should carefully consider any additional trading costs associated with a particular Investment Manager before selecting an Investment Manager to manage the client's Program account.

## PROGRAM INVESTMENT MANAGERS TRADING AWAY

A list of Investment Managers that informed Janney that they traded away from Janney during 2021 is set forth below. An Investment Manager's past trading away practice is not a guarantee that such manager will follow the same practice in the future. It is possible that Investment Managers not listed below will trade away from Janney in the future or that Investment Managers listed below will trade away more frequently or at a higher cost to clients. Thus, a client's trading costs relating to step out trades could be greater than shown below.

The information about each manager provided below is based solely upon the information the Investment Manager provided to Janney. As a result, Janney has not independently verified the information, nor do any of its affiliates or associates make any representation as to the accuracy of any such information. Investment Managers were required to attest to the accuracy of their responses and to having policies and procedures related to best execution.

A client should contact their Janney Financial Advisor to obtain specific information about an Investment Manager's trade away practices.

Manager Name/Strategy	Additional Cost Incurred by Clients Participating in those Trades <sup>1</sup>	Dollar-Weighted <sup>2</sup> Percentage of Client Trades Stepped Out
<b>Advisors Asset Management</b>		
Core Tax Exempt	0.00	100
<b>Agincourt Capital Management, LLC</b>		
Intermediate Fixed Income	0.00	100
<b>Alliance Bernstein</b>		
AB Tax-Aware Fixed Income SMA	0.00	53
<b>Appleton Partners, Inc.</b>		
Intermediate Municipal	0.00	100
<b>Belle Haven Investments</b>		
Ladder PLUS	0.00	100
Taxable Ladder PLUS	0.00	100
Muni PLUS	0.00	100
<b>BlackRock</b>		
Intermediate Municipal Fixed Income	0.00	100
<b>Boyd Watterson Asset Mgt.</b>		
Investment Grade Intermediate SMA Fixed Income	0.00	100
Ultra Enhanced Core SMA Fixed Income	0.00	100
<b>Capital Group</b>		
Capital Group Intermediate Muni SMA (National)	0.00	100

Manager Name/Strategy	Additional Cost Incurred by Clients Participating in those Trades <sup>1</sup>	Dollar-Weighted <sup>2</sup> Percentage of Client Trades Stepped Out
<b>Cincinnati Asset Management</b>		
High Yield Corporate Bonds	0.00	100
<b>GW&amp;K Investment Management</b>		
GW&K Municipal Bond Strategy	0.00	100
<b>Gyroscope Capital Management Group</b>		
Optimized Listed Option Strategy	0.03	100
<b>Janney Capital Management<sup>3</sup></b>		
All Cap Core	0.05	81
Active Index	0.05	90
Active Index Fixed Income	0.05	85
Active Index International	0.05	16
Active Index Domestic	0.05	43
Dynamic Asset	0.05	96
Dynamic Income	0.05	42
Equity Income	0.05	71
U.S. Quality Dividend	0.05	25
Global Small Cap	0.05	62
Global Sustainability	0.05	56
ETF Advantage	0.05	95
Keystone Discretionary	0.05	58
<b>JPMorgan Asset Management</b>		
Muni Ladders Strategy	0.00	100
<b>Legg Mason Private Portfolio Group<sup>4</sup></b>		
All Cap Growth	0.01	66
All Cap Value	0.01	97
All Cap Value Balanced Taxable 60/40	0.01	100
Appreciation Balanced Taxable 70/30	0.01	52
Balanced Income Tax Favored State Specific 60/40	0.00	22
Balanced Income Taxable 70/30	0.00	74
Custom - ClearBridge Implemented	0.01	85
Dividend Strategy Balanced Taxable 60/40	0.02	68
Dividend Strategy Blanced Tax Favored 70/30	0.02	61
Dividend Strategy Balanced Taxable 70/30	0.02	99
Dividend Strategy ESG	0.01	59
International Growth ADR ESG	0.01	95
International Growth ADR	0.01	19
Large Cap Growth ESG	0.01	90
Large Cap Value	0.01	21
MDA0 - All Cap Blend	0.01	67
MDA0 - All Cap Blend Balanced Taxable 70/30	0.01	91
MDA1 - Large Cap Blend	0.01	95
MDA3 - Dividends & Growth	0.02	63
MDA3 - Dividends & Growth Balanced Tax Favored 60/40	0.02	52
MDA3 - Dividends & Growth Balanced Tax Favored 70/30	0.02	37
MDA3 - Dividends & Growth Balanced Taxable 60/40	0.02	74
MDA3 - Dividends & Growth Balanced Taxable 70/30	0.02	89
MDA4 - Global Multi-Cap Growth	0.01	95
MDA5 - Multi-Cap Blend III	0.01	96
MDA5A – Diversified All Cap	0.01	88
MDA5A - Diversified All Cap Balanced Taxable 70/30	0.01	85
MDA7 - Global Growth	0.01	97
MDA7 - Global Growth Balanced Tax Favored 60/40	0.01	92
MDA7A - Global All Cap	0.01	87
MDA8 - Global All Cap Blend	0.01	56
Mid Cap	0.00	100
Small Cap Growth	0.00	85

Manager Name/Strategy	Additional Cost Incurred by Clients Participating in those Trades <sup>1</sup>	Dollar-Weighted <sup>2</sup> Percentage of Client Trades Stepped Out
<b>Miller Tabak Asset Management</b>		
MTAM Intermediate Tax-Free Municipal	0.00	100
MTAM Enhanced Tax-Free Municipal	0.00	100
MTAM Short Duration Tax- Free Municipal	0.00	100
<b>Nuveen Asset Management<sup>5</sup></b>		
Intermediate Term High-Quality Municipal Bond	10 bps	99
<b>Pacific Income Advisers</b>		
Limited Duration MACS	0.00	81
Market Duration MACS	0.00	71
<b>Parametric Portfolio Advisors</b>		
Parametric Corporate Ladders	0.00	100
Parametric TABS Municipal Laddered	0.00	100
Parametric TABS Managed Municipal	0.00	100
Parametric Custom Core	0.02	1
Parametric Enhanced Income (CEFs)	0.01	3
<b>PIMCO</b>		
PIMCO Total Return for Managed Accounts	0.00	100
<b>Reinhart Partners</b>		
Active Intermediate Fixed Income	0.00	100
<b>The Swarthmore Group, Inc.</b>		
Intermediate High Quality Fixed Income	0.00	100
All Corporate Fixed Income	0.00	100
<b>Tandem Investments</b>		
Tandem Large Cap Core	0.02	10
Tandem Mid Cap Core	0.02	12
Tandem Equity	0.02	12
<b>Thompson, Siegel &amp; Walmsley LLC</b>		
Balanced	0.00	100
Equity	0.00	100
<b>Thornburg Investment Management</b>		
Thornburg International ADR Strategy	0.03	1
Thornburg Intermediate Term Municipal Strategy	0.00	100

<sup>1</sup> Additional cost incurred by clients participating in those trades is expressed as cost per share “cps” unless otherwise noted as basis points per share “bps” and has been provided to Janney by the manager.

<sup>2</sup> All percentages are approximate and are rounded to the nearest whole number. For purposes of this calculation, the manager was required to divide (a) the total dollar amount of Janney client transactions in equity securities that the manager placed with broker-dealers other than Janney for execution by (b) the total dollar amount of Janney client transactions in equity securities the manager placed with all broker-dealers, including Janney. For example, assume Firm A placed a total of 1,000 equity securities transactions for Janney clients during 2020, having an aggregate dollar value of \$1,000,000. Of that total, Firm A placed 700 of those transactions with broker-dealers other than Janney. The aggregate dollar value of the equity securities transactions placed with the other broker-dealers was \$950,000. The percentage dollar amount of trades in equity securities that Firm A traded away in 2020 was 95.0% (\$950,000 divided by \$1,000,000).

<sup>3</sup> Beginning February 19, 2021, Janney Capital Management increased the additional costs per share from \$0.03 per share to \$0.05 per share.

<sup>4</sup> Legg Mason Private Portfolio Group indicated the number of accounts, timing of inception and terminations, client directed cash flows and time period under review, can all be variables that affect the percentage dollar amount of trades that were stepped out.

<sup>5</sup> Nuveen Asset Management provided a range between 1 to 10 basis points per bond. Expressed the highest cost of 10 basis points in the table above.