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Invesco Asset Management Limited

Annual Trade Execution Report (RTS 28)

Report Dated: April 2019

For the Period: 1 January 2018 - 31 December 2018

1. Purpose of this document

This document (this "Report") details the top five venues used for placement and the top five venues used for execution by Invesco Asset Management Limited ("IAML") for the 2018 calendar year period covering the applicable classes of financial instruments.

This report is a regulatory requirement as part of MiFID II (Markets in Financial Instruments Directive II) where firms are expected to publish:

- a. A summary of the analysis and conclusions drawn from the detailed monitoring of the guality of execution obtained on execution venues (during the previous year).
- b. The top five placement venues in terms of trading volumes for all placed client orders per class of financial instrument for the preceding calendar year.
- c. The top give execution venues in terms of trading volumes for all executed client orders per class of financial instrument for the preceding calendar year.

Note that where both Placement and Execution tables are present for any instrument class, the percentage values represented therein are calculated from the instrument dataset as a whole. For this reason, the values can appear very small as they represent a very low proportion of the overall total, however they are included due to the segregation criteria between Placement and Execution (see Notes and Assumptions).

Similarly, for instruments where Execution Venues such as Tradeweb are represented in the tables, followed by a look-through to execution brokers, then once again the values presented are calculated as a proportion of the instrument dataset as a whole, not just brokers who we have interacted with in such venues.

2. What should I expect to see in this report?

This report contains a summary of the analysis and conclusions drawn from the monitoring of the quality of execution obtained on execution venues where client orders were executed in the 2018 calendar year (for each respective class of instrument), together with the tables as prescribed under MiFID II for the applicable classes of financial instruments for which IAML has executed client orders. This information is provided as follows:

a. The Execution Factors

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 making assessments of the quality of execution.

b. Close Links

A description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders.

c. Specific Arrangements

A description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received (if any).

d. Change in Execution Venues

An explanation of the factors that led to a change in the list of execution venues listed in the firm's execution policy, if such a change occurred.

e. Client Categorisation

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.

f. Data and Tool Usage

An explanation of how the firm has used any data or tools relating to the quality of execution including any data published by execution venues and systematic internalisers (SI's).

The IAML Order Execution Policy can be found in the Invesco UK website (About us > Corporate Policies).

3. Notes and Assumptions

The 'Proportion of volume executed as a percentage of total in that class' is to be interpreted as the percentage of the market value of all orders generated by the firm in that class of financial instrument, for professional clients that were executed with the respective venue / broker. Whilst market value is normally clearly understood (e.g. Equities), for derivatives and options, the notional value is used.

The 'Proportion of orders executed as a percentage of total in that class' is to be interpreted as the percentage of the number of portfolio level orders generated by the firm in that class of financial instrument, for professional clients that were executed with the respective venue/broker.

The percentage of passive and aggressive orders are not displayed in the 'Execution' section as it implies direct execution with a venue / counterpart on a principal basis. If orders are placed on a venue/with a broker on an agency basis, they will be categorised as 'Placement'. There may be a combination of both passive and aggressive 'child' fills for such 'parent' orders but this is typically at the discretion of the broker we have used and the accuracy of capturing such granular detail is not currently sufficient for inclusion in this report.

FX rates as at 31 December 2018 were used to convert all market values to GBP.

The Execution Factors

Within the Equities space, there is a high availability of liquidity across a number of different venues. The combination of this with the availability of in depth price discovery has meant 'Total consideration' (combination of 'price' and 'explicit costs') has been the primary factor. 'Implicit costs' and 'likelihood of execution' have also been determining factors. Where liquidity is lower than expected, 'speed and likelihood of execution' have taken priority.

Close Links

IAML may place orders with affiliate Invesco entities in other locations globally, for example Invesco Advisers Inc. ('IAI'), to execute orders in this class of instrument. IAI may in turn use Luminex Trading and Analytics LLC, a 'dark' venue jointly owned by Invesco, to execute some orders in its pursuit of best execution.

Specific Arrangements

There are no specific arrangements concerning rebates or nonmonetary benefits with execution venues used to execute trades for this class of instrument.

Change in Execution Venues

To access liquidity that may be unique to them at any time, the following were added as a new broker in 2018: Jones Trading, Jane Street and EFG Hermes.

Order execution by client categorisation

With respect to order execution, IAML does not treat clients differently based on client categorisation. All execution decisions are made by the respective IAML trading desk who execute trades in line with the IAML Order Execution Policy.

Data and Tool Usage

IAML currently monitors and reviews venues used for execution. RTS 27 and 28 data is starting to be analysed but the analysis is still in its early days and as we are able to process the data more effectively in the future we will look to integrate the additional information into our execution process.

Consolidated Tape Provider

Consolidated tape providers were not used for this class of financial instrument for the 2018 calendar year. If this becomes available, IAML will review the usefulness of the consolidated tape and will utilise it where it allows IAML to judge the quality of price received from various counterparties and aide in the benchmarking of brokers.

Top 5 Venues - Execution

Class of Instrument

Equities - Shares & Depositary Receipts - Tick Size liquidity bands 1 and 2

Notification if <1 average trade per business day in the previous year Yes

(descending order)	Proportion of volume executed as a percentage of total in that class	percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Merrill Lynch International (GGDZP1UYGU9STUHRDP48)	0.042	0.027	-	-	0.00
EXANE LIMITED (213800SH9MTNZQJKP526)	0.023	0.004	-	-	0.00
HSBC BANK PLC (MP6I5ZYZBEU3UXPYFY54)	0.021	0.006	-	-	0.00
J.P. Morgan Securities PLC (K6Q0W1PS1L104IQL9C32)	0.015	0.024	_	-	0.00
Goldman Sachs International (W22LROWP2IHZNBB6K528)	0.012	0.013	-	-	0.00

Top 5 Venues - Execution

Class of Instrument

Equities - Shares & Depositary Receipts - Tick Size liquidity bands 3 and 4

Notification if <1 average trade per business day in the previous year $\ensuremath{\text{No}}$

Top 5 Venues ranking in terms of volume

(descending order)	Proportion of volume executed as a percentage of total in that class	percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Jane Street Financial Limited (549300ZHEHX8M31RP142)	1.03	0.26	-	-	0.00
J.P. Morgan Securities PLC (K6Q0W1PS1L104IQL9C32)	0.74	0.35	-	-	0.00
Merrill Lynch International (GGDZP1UYGU9STUHRDP48)	0.30	0.13	-	-	0.00
Credit Suisse Securities (Europe) Limited (DL6FFRRLF74S01HE2M14)	0.30	0.22	-	-	0.00
Goldman Sachs International (W22LROWP2IHZNBB6K528)	0.29	0.17	-	-	0.00

Top 5 Venues - Execution

Class of Instrument

Equities - Shares & Depositary Receipts - Tick Size liquidity bands 5 and 6

Notification if <1 average trade per business day in the previous year $\ensuremath{\text{No}}$

(descending order)	Proportion of volume executed as a percentage of total in that class	percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Credit Suisse Securities (Europe) Limited (DL6FFRRLF74S01HE2M14)	1.10	0.54	-	-	0.00
Jane Street Financial Limited (549300ZHEHX8M31RP142)	0.84	0.24	-	-	0.00
J.P. Morgan Securities PLC (K6Q0W1PS1L104IQL9C32)	0.79	0.47	-	-	0.00
Goldman Sachs International (W22LROWP2IHZNBB6K528)	0.75	0.34	_	-	0.00
Merrill Lynch International (GGDZP1UYGU9STUHRDP48)	0.58	0.32	-	-	0.00

Top 5 Venues - Execution

Class of Instrument

Other instruments

Notification if <1 average trade per business day in the previous year $\,$

Yes

Top 5 Venues ranking in terms of volume (descending order)

(descending order)	Proportion of volume executed as a percentage of total in that class	percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
J.P. Morgan Securities PLC (K6Q0W1PS1L104IQL9C32)	0.076	0.068	-	-	0.00
Credit Suisse Securities (Europe) Limited (DL6FFRRLF74S01HE2M14)	0.039	0.052	-	-	0.00
HSBC BANK PLC (MP6I5ZYZBEU3UXPYFY54)	0.028	0.005	-	-	0.00
Morgan Stanley & Co. International PLC (4PQUHN3JPFGFNF3BB653)	0.026	0.005	-	-	0.00
Goldman Sachs International (W22LROWP2IHZNBB6K528)	0.018	0.021	-	-	0.00

Top 5 Venues - Placement

Class of Instrument

Equities - Shares & Depositary Receipts - Tick Size liquidity bands 1 and 2 $\,$

Notification if <1 average trade per business day in the previous year $\ensuremath{\text{No}}$

(descending order)	Proportion of volume executed as a percentage of total in that class	percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Invesco Advisers, Inc. (037NHJVF7S22I10N0U83)	15.54	10.96	n/a	n/a	0.00
Invesco Hong Kong Limited (5493001YEU7254KG2F83)	13.91	7.87	n/a	n/a	0.00
Macquarie Capital (Europe) Limited (549300GX4FPMFF91RJ37)	10.12	14.31	n/a	n/a	0.00
Merrill Lynch International (GGDZP1UYGU9STUHRDP48)	9.32	12.13	n/a	n/a	0.00
UBS AG (BFM8T61CT2L1QCEMIK50)	9.04	8.90	n/a	n/a	0.00

Top 5 Venues - Placement

Class of Instrument

Equities - Shares & Depositary Receipts - Tick Size liquidity bands 3 and 4

Notification if <1 average trade per business day in the previous year $\ensuremath{\text{No}}$

Top 5 Venues ranking in terms of volume

(descending order)	Proportion of volume executed as a percentage of total in that class	percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
LIQUIDNET EUROPE LIMITED (213800ZIRB79BE5XQM68)	11.63	11.70	n/a	n/a	0.00
INVESTMENT TECHNOLOGY GROUP LIMITED (213800EEC95PRUCEUP63)	10.48	11.22	n/a	n/a	0.00
Merrill Lynch International (GGDZP1UYGU9STUHRDP48)	5.96	8.70	n/a	n/a	0.00
Morgan Stanley & Co. International PLC (4PQUHN3JPFGFNF3BB653)	4.70	6.83	n/a	n/a	0.00
Credit Suisse Securities (Europe) Limited (DL6FFRRLF74S01HE2M14)	4.66	4.21	n/a	n/a	0.00

Top 5 Venues - Placement

Class of Instrument

Equities - Shares & Depositary Receipts - Tick Size liquidity bands 5 and 6

Notification if <1 average trade per business day in the previous year $\ensuremath{\text{No}}$

(descending order)	Proportion of volume executed as a percentage of total in that class	percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
LIQUIDNET EUROPE LIMITED (213800ZIRB79BE5XQM68)	8.74	10.16	n/a	n/a	0.00
Merrill Lynch International (GGDZP1UYGU9STUHRDP48)	8.63	11.50	n/a	n/a	0.00
INVESTMENT TECHNOLOGY GROUP LIMITE (213800EEC95PRUCEUP63)	D 8.37	9.43	n/a	n/a	0.00
J.P. Morgan Securities PLC (K6Q0W1PS1L104IQL9C32)	7.61	6.28	n/a	n/a	0.00
Credit Suisse Securities (Europe) Limited (DL6FFRRLF74S01HE2M14)	7.44	6.39	n/a	n/a	0.00

Top 5 Venues - Placement

Class of Instrument

Other instruments

Notification if <1 average trade per business day in the previous year

No

Top 5 Venues ranking in terms of volume

(descending order)	Proportion of volume executed as a percentage of total in that class	percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Invesco Hong Kong Limited (5493001YEU7254KG2F83)	54.03	23.60	n/a	n/a	0.00
Credit Suisse Securities (Europe) Limited (DL6FFRRLF74S01HE2M14)	8.74	6.77	n/a	n/a	0.00
Macquarie Capital (Europe) Limited (549300GX4FPMFF91RJ37)	7.08	8.24	n/a	n/a	0.00
Merrill Lynch International (GGDZP1UYGU9STUHRDP48)	5.68	11.78	n/a	n/a	0.00
Invesco Advisers, Inc. (037NHJVF7S22I10N0U83)	3.98	12.19	n/a	n/a	0.00

Top 5 Venues - Placement

Class of Instrument

Securitized Derivatives - Warrants and Certificate Derivatives

Notification if <1 average trade per business day in the previous year

(descending order)	Proportion of volume executed 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
Invesco Advisers, Inc. (O37NHJVF7S22I1ONOU83)	100.00	100.00	n/a	n/a	0.00

5. Exchange traded products

The Execution Factors

When dealing in exchange traded products, specifically for standard size orders where there is ample liquidity, 'price' has been the primary factor. Where the market is volatile, 'speed of execution' has been prioritised. In some instances, 'implicit cost' is prioritised to limit the market impact of larger size orders in the absence of volatility or where the product is illiquid.

Close Links

There are no close links or conflicts of interest with any venue that we currently use for executing orders in this class of instrument.

Specific Arrangements

There are no specific arrangements concerning rebates or nonmonetary benefits with execution venues used to execute trades for this class of instrument.

Change in Execution Venues

There have been no changes to the execution venues for this class of financial instrument for the 2018 calendar year.

Order execution by client categorisation

With respect to order execution, IAML does not treat clients differently based on client categorisation. All execution decisions are made by the respective IAML trading desk who execute trades in line with the IAML Order Execution Policy.

Data and Tool Usage

IAML currently monitor and review venues used for execution. RTS 27 and 28 data is starting to be analysed but the analysis is still in its early days and as we are able to process the data more effectively in the future we will look to integrate the additional information into our execution process.

Consolidated Tape Provider

Consolidated tape providers were not providing a consolidated tape for this class of financial instrument for the 2018 calendar year. If this becomes available, IAML will review the usefulness of the consolidated tape and will utilise it where it allows IAML to judge the quality of price received from various counterparties and aide in the benchmarking of brokers.

Top 5 Venues - Execution

Class of Instrument

Exchange traded products (Exchange traded funds, exchange traded notes and exchange traded commodities)

Notification if <1 average trade per business day in the previous year

INO

Top 5 Venues ranking in terms of volume (descending order)

(descending order)	Proportion of volume executed 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
Tradeweb Europe Limited (2138001WXZQOPMPA3D50)	85.44	90.67	-	-	0.00

(descending order)	volume executed 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
Flow Traders B.V. (549300CLJI9XDH12XV51)	34.60	29.13	-	-	0.00
Jane Street Financial Limited (549300ZHEHX8M31RP142)	29.80	30.74	-	-	0.00
Susquehanna International Securities Ltd (635400IAV22ZOU1NFS89)	10.08	14.09	_	-	0.00
Sociètè Gènèralè SA (O2RNE8IBXP4R0TD8PU41)	3.36	3.45	-	-	0.00
Credit Suisse Securities (Europe) Limited (DL6FFRRLF74S01HE2M14)	3.21	7.43	-	-	0.00

5. Exchange traded products

Top 5 Venues - Placement

Class of Instrument

Exchange traded products (Exchange traded funds, exchange traded notes and exchange traded commodities)

Notification if <1 average trade per business day in the previous year $\overline{}$

Yes

(descending order)	Proportion of volume executed 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
Macquarie Capital (Europe) Limited (549300GX4FPMFF91RJ37)	4.16	1.19	n/a	n/a	0.00
BARCLAYS CAPITAL SECURITIES LIMITED (K9WDOH4D2PYBSLSOB484)	2.32	0.12	n/a	n/a	0.00
Invesco Advisers, Inc. (O37NHJVF7S22I1ONOU83)	2.04	2.97	n/a	n/a	0.00
UBS AG (BFM8T61CT2L1QCEMIK50)	1.92	0.18	n/a	n/a	0.00
Invesco Australia Limited (549300JFBM63V7YU0V69)	1.28	0.12	n/a	n/a	0.00

6. Debt Instruments - Bonds

The Execution Factors

Within the fixed income space execution costs are almost entirely standardised and so 'execution cost' is unlikely to be considered a high priority. We placed highest priority on 'price' where it's possible to obtain quotes from multiple counterparties. Sometimes we prioritised 'size of order' as the sizes to be traded were larger than the market would have expected. In these cases, we worked with one or two liquidity providers to execute the trade rather than sending to multiple dealers and risking market sensitive information moving the price. Despite the size being manageable for the market most of the time, there were instances where the position or directionality of the dealers were restrictive, such as trying to buy a bond when most dealers are also looking to buy or the liquidity of a bond being very low. In such cases, we prioritised 'likelihood of execution' as we looked to trade with the counterparty most likely to execute where the screen prices were unlikely to be honoured by dealers.

Close Links

There are no close links or conflicts of interest with any venue that we currently use for executing orders in this class of instrument.

Specific Arrangements

There are no specific arrangements concerning rebates or nonmonetary benefits with execution venues used to execute trades for this class of instrument.

Change in Execution Venues

There have been no changes to the execution venues for this class of financial instrument for the 2018 calendar year.

Order execution by client categorisation

With respect to order execution, IAML does not treat clients differently based on client categorisation. All execution decisions are made by the respective IAML trading desk who execute trades in line with the IAML Order Execution Policy.

Data and Tool Usage

IAML currently monitor and review venues used for execution. RTS 27 and 28 data is starting to be analysed but the analysis is still in its early days and as we are able to process the data more effectively in the future we will look to integrate the additional information into our execution process.

Consolidated Tape Provider

Consolidated tape providers were not providing a consolidated tape for this class of financial instrument for the 2018 calendar year. If this becomes available, IAML will review the usefulness of the consolidated tape and will utilise it where it allows IAML to judge the quality of price received from various counterparties and aide in the benchmarking of brokers.

Top 5 Venues - Execution

Class of Instrument

Debt instruments - Bonds

Notification if <1 average trade per business day in the previous year

Top 5 Venues ranking in terms of volume (descending order)

(descending order)	Proportion of volume executed 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
Bloomberg Trading Facility Limited (549300R0EJDDAXM6LU05)	27.84	25.62	-	-	0.00
Tradeweb Europe Limited (2138001WXZQOPMPA3D50)	18.58	13.79	-	-	0.00
MarketAxess Capital Limited (529900CTXON8S5AOCB70)	5.53	11.81	-	-	0.00

Top 5 Venues ranking in terms of volume (descending order)

(descending order)	Proportion of volume executed 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
Goldman Sachs International (W22LROWP2IHZNBB6K528)	12.01	8.41	-	-	0.00
HSBC BANK PLC (MP6I5ZYZBEU3UXPYFY54)	10.93	8.67	-	-	0.00
BNP PARIBAS (ROMUWSFPU8MPRO8K5P83)	9.79	5.19	-	-	0.00
J.P. Morgan Securities PLC (K6Q0W1PS1L104lQL9C32)	7.45	7.35	-	-	0.00
BARCLAYS CAPITAL SECURITIES LIMITED (K9WDOH4D2PYBSLSOB484)		6.29	-	-	0.00

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Debt Instruments - Bonds

Top 5 Venues - Placement

Class of Instrument Debt instruments - Bonds

Notification if <1 average trade per business day in the previous year

No

(descending order)	Proportion of volume executed 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
Invesco Advisers, Inc. (037NHJVF7S22I10NOU83)	1.27	1.30	n/a	n/a	0.00

7. Debt Instruments - Money Market Instruments (MMI)

The Execution Factors

Due to the limited number of high quality issuers offering competitive levels, high demand for paper and, in primary issuance dealers tend to offer identical prices. We placed the highest importance on 'likelihood of execution', 'speed of execution' and 'diversity of supply'.

Close Links

There are no close links or conflicts of interest with any venue that we currently use for executing orders in this class of instrument.

Specific Arrangements

There are no specific arrangements concerning rebates or nonmonetary benefits with execution venues used to execute trades for this class of instrument.

Change in Execution Venues

There have been no changes to the execution venues for this class of financial instrument for the 2018 calendar year.

Order execution by client categorisation

With respect to order execution, IAML does not treat clients differently based on client categorisation. All execution decisions are made by the respective IAML trading desk who execute trades in line with the IAML Order Execution Policy.

Data and Tool Usage

IAML currently monitor and review venues used for execution. RTS 27 and 28 data is starting to be analysed but the analysis is still in its early days and as we are able to process the data more effectively in the future we will look to integrate the additional information into our execution process.

Consolidated Tape Provider

Consolidated tape providers were not providing a consolidated tape for this class of financial instrument for the 2018 calendar year. If this becomes available, IAML will review the usefulness of the consolidated tape and will utilise it where it allows IAML to judge the quality of price received from various counterparties and aide in the benchmarking of brokers.

Top 5 Venues - Execution

Class of Instrument

Debt instruments - Money markets instruments

Notification if <1 average trade per business day in the previous year No

Top 5 Venues ranking in terms of volume (descending order)

(descending order)	Proportion of volume executed 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
Tradeweb Europe Limited (2138001WXZQOPMPA3D50)	0.91	15.00	-	-	0.00
Bloomberg Trading Facility Limited (549300R0EJDDAXM6LU05)	0.22	1.20	-	-	0.00

(descending order)	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
J.P. Morgan Securities PLC (K6Q0W1PS1L104IQL9C32)	55.11	30.31	-	-	0.00
Crèdit Agricole Corporate and Investment (1VUV7VQFKUOQSJ21A208)	Bank 24.00	12.50	_	-	0.00
BGC Brokers L.P. (ZWNFQ48RUL8VJZ2AIC12)	3.62	6.78	-	-	0.00
UBS AG (BFM8T61CT2L1QCEMIK50)	2.67	5.79	-	-	0.00
BARCLAYS CAPITAL SECURITIES LIMITED (K9WDOH4D2PYBSLSOB484)	2.21	5.99	-	-	0.00

Debt Instruments - Money Market Instruments (MMI)

Top 5 Venues - Placement

Class of Instrument

Debt instruments - Money markets instruments

Notification if <1 average trade per business day in the previous year

Yes

(descending order)	Proportion of volume executed 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
Invesco Advisers, Inc. (037NHJVF7S22I10NOU83)	0.61	4.52	n/a	n/a	0.00

8. Interest Rate Derivatives

Interest rate derivatives - Futures and options admitted to trading on a trading venue (listed) Interest rate derivatives - Swaps, forwards and other interest rates derivatives (over the counter)

The Execution Factors - Futures and options admitted to trading on a trading venue

When trading in listed instruments, 'speed of execution' has been the primary factor given the prevailing market price and explicit costs are equivalent across brokers, specifically for standard size orders. This is also the case where the market is volatile, where the objective is to quickly achieve a better price than would be obtained by executing over a period of time. In some instances, 'implicit cost' is prioritised to limit the market impact of larger size orders in the absence of volatility.

The Execution Factors - Swaps, forwards and other interest rates derivatives

We generally traded on the best 'price' basis asking multiple counterparties when the size was within the size manageable by the market participants for that trading day. For trades that were larger than the normal market size (prioritising 'size of order'), we looked for counterparties who had a natural opposing position that would enable them to take the risk without moving the market. Where a naturally opposing position is not found, we considered counterparties who would be able to distribute the risk efficiently through their franchise.

Close Links

There are no close links or conflicts of interest with any venue that we currently use for executing orders in this class of instrument.

Specific Arrangements

There are no specific arrangements concerning rebates or nonmonetary benefits with execution venues used to execute trades for this class of instrument.

Change in Execution Venues

There have been no changes to the execution venues for this class of financial instrument for the 2018 calendar year.

Order execution by client categorisation

With respect to order execution, IAML does not treat clients differently based on client categorisation. All execution decisions are made by the respective IAML trading desk who execute trades in line with the IAML Order Execution Policy.

Data and Tool Usage

IAML currently monitor and review venues used for execution. RTS 27 and 28 data is starting to be analysed but the analysis is still in its early days and as we are able to process the data more effectively in the future we will look to integrate the additional information into our execution process.

Consolidated Tape Provider

Consolidated tape providers were not providing a consolidated tape for this class of financial instrument for the 2018 calendar year. If this becomes available, IAML will review the usefulness of the consolidated tape and will utilise it where it allows IAML to judge the quality of price received from various counterparties and aide in the benchmarking of brokers.

Top 5 Venues - Execution

Class of Instrument

Interest rates derivatives - Swaps, forwards, and other interest rates derivatives

Notification if <1 average trade per business day in the previous year

Top 5 Venues ranking in terms of volume (descending order)

(descending order)	Proportion of volume executed 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
Tradeweb Europe Limited (2138001WXZQOPMPA3D50)	27.57	23.44	-	-	0.00
Tradeweb SEF LLC (5493003NKIZWOQGS5U67)	0.84	11.66	-	-	0.00

(descending order)	Proportion of volume executed as a percentage of total in that class	percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Merrill Lynch International (GGDZP1UYGU9STUHRDP48)	14.71	10.23	-	-	0.00
Goldman Sachs International (W22LROWP2IHZNBB6K528)	11.65	10.02	-	-	0.00
Natwest Markets Ltd (RR3QWICWWIPCS8A4S074)	6.23	11.89	-	-	0.00
BNP PARIBAS (ROMUWSFPU8MPRO8K5P83)	5.83	8.07	-	-	0.00
BARCLAYS BANK PLC (G5GSEF7VJP5I7OUK5573)	5.51	6.87	-	-	0.00

8. **Interest Rate Derivatives**

Interest rate derivatives - Futures and options admitted to trading on a trading venue (listed) Interest rate derivatives - Swaps, forwards and other interest rates derivatives (over the counter)

Top 5 Venues - Placement

Class of Instrument

Interest rates derivatives - Swaps, forwards, and other interest rates derivatives

Notification if <1 average trade per business day in the previous year

No

Top 5 Venues ranking in terms of volume

(descending order)	Proportion of volume executed 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
Invesco Advisers, Inc. (O37NHJVF7S22I1ONOU83)	38.09	31.92	n/a	n/a	0.00

Top 5 Venues - Placement

Class of Instrument

Interest rates derivatives - Futures and options admitted to trading on a trading venue

Notification if <1 average trade per business day in the previous year

No

(descending order)	Proportion of volume executed as a percentage of total in that class	percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Citigroup Global Markets Limited (XKZZ2JZF41MRHTR1V493)	60.21	13.43	n/a	n/a	0.00
Nomura International PLC (DGQCSV2PHVF7I2743539)	25.75	7.82	n/a	n/a	0.00
Merrill Lynch International (GGDZP1UYGU9STUHRDP48)	7.14	43.18	n/a	n/a	0.00
Morgan Stanley & Co. International PLC (4PQUHN3JPFGFNF3BB653)	2.37	3.48	n/a	n/a	0.00
UBS AG (BFM8T61CT2L1QCEMIK50)	1.69	14.89	n/a	n/a	0.00

9. Credit Derivatives

Credit Derivatives - Other credit derivatives

The Execution Factors

We generally traded on the best 'price' basis asking multiple counterparties when the size was within the size manageable by the market participants for that trading day. For trades that were larger than the normal market size (prioritising 'size of order'), we looked for counterparties who had a natural opposing position that would enable them to take the risk without moving the market. Where a naturally opposing position is not found, we considered counterparties who would be able to distribute the risk efficiently through their franchise.

Close Links

There are no close links or conflicts of interest with any venue that we currently use for executing orders in this class of instrument.

Specific Arrangements

There are no specific arrangements concerning rebates or nonmonetary benefits with execution venues used to execute trades for this class of instrument.

Change in Execution Venues

There have been no changes to the execution venues for this class of financial instrument for the 2018 calendar year.

Order execution by client categorisation

With respect to order execution, IAML does not treat clients differently based on client categorisation. All execution decisions are made by the respective IAML trading desk who execute trades in line with the IAML Order Execution Policy.

Data and Tool Usage

IAML currently monitor and review venues used for execution. RTS 27 and 28 data is starting to be analysed but the analysis is still in its early days and as we are able to process the data more effectively in the future we will look to integrate the additional information into our execution process.

Consolidated Tape Provider

Consolidated tape providers were not providing a consolidated tape for this class of financial instrument for the 2018 calendar year. If this becomes available, IAML will review the usefulness of the consolidated tape and will utilise it where it allows IAML to judge the quality of price received from various counterparties and aide in the benchmarking of brokers.

Top 5 Venues - Execution

Class of Instrument

Credit derivatives - Other credit derivatives

Notification if <1 average trade per business day in the previous year

Top 5 Venues ranking in terms of volume (descending order)

(descending order)	Proportion of volume executed 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
Tradeweb Europe Limited (2138001WXZQOPMPA3D50)	54.03	35.27	-	-	0.00
Tradeweb SEF LLC (5493003NKIZWOQGS5U67)	2.46	17.14	-	-	0.00
Bloomberg SEF LLC (5493003IUYOH354SNS58)	0.02	0.08	-	-	0.00

(descending order)	Proportion of volume executed as a percentage of total in that class	percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Goldman Sachs International (W22LROWP2IHZNBB6K528)	23.75	14.53	-	-	0.00
BNP PARIBAS (ROMUWSFPU8MPRO8K5P83)	21.04	8.08	-	-	0.00
Citigroup Global Markets Limited (XKZZ2JZF41MRHTR1V493)	17.81	13.88	-	-	0.00
J.P. Morgan Securities PLC (K6Q0W1PS1L104lQL9C32)	15.80	14.94	-	-	0.00
Nomura International PLC (DGQCSV2PHVF7I2743539)	5.81	8.82	-	-	0.00

9. **Credit Derivatives**

Credit Derivatives - Other credit derivatives

Top 5 Venues - Placement

Class of Instrument

Credit derivatives - Other credit derivatives

Notification if <1 average trade per business day in the previous year

Yes

(descending order)	Proportion of volume executed 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
Invesco Advisers, Inc. (037NHJVF7S22I10NOU83)	9.83	18.37	n/a	n/a	0.00

10. Equity Derivatives

Equity derivatives - Futures and options admitted to trading on a trading venue (listed) Equity derivatives - Swaps and other equity derivatives (over the counter)

The Execution Factors – Futures and options admitted to trading on a trading venue

When trading in listed instruments, 'speed of execution' has been the primary factor given the prevailing market price and explicit costs are equivalent across brokers, specifically for standard size orders. This is also the case where the market is volatile, where the objective is to quickly achieve a better price than would be obtained by executing over a period of time. In some instances, 'implicit cost' is prioritised to limit the market impact of larger size orders in the absence of volatility.

The Execution Factors - Swaps and other equity derivatives Price has been the most important factor. In some instances

Price has been the most important factor. In some instances, a combination of both 'price' and 'likelihood of execution' have been prioritised.

Close Links

There are no close links or conflicts of interest with any venue that we currently use for executing orders in this class of instrument.

Specific Arrangements

There are no specific arrangements concerning rebates or nonmonetary benefits with execution venues used to execute trades for this class of instrument.

Change in Execution Venues

There have been no changes to the execution venues for this class of financial instrument for the 2018 calendar year.

Order execution by client categorisation

With respect to order execution, IAML does not treat clients differently based on client categorisation. All execution decisions are made by the respective IAML trading desk who execute trades in line with the IAML Order Execution Policy.

Data and Tool Usage

IAML currently monitor and review venues used for execution. RTS 27 and 28 data is starting to be analysed but the analysis is still in its early days and as we are able to process the data more effectively in the future we will look to integrate the additional information into our execution process.

Consolidated Tape Provider

Consolidated tape providers were not providing a consolidated tape for this class of financial instrument for the 2018 calendar year. If this becomes available, IAML will review the usefulness of the consolidated tape and will utilise it where it allows IAML to judge the quality of price received from various counterparties and aide in the benchmarking of brokers.

Top 5 Venues - Execution

Class of Instrument

Equity Derivatives - Swaps and other equity derivatives

Notification if <1 average trade per business day in the previous year

(descending order)	Proportion of volume executed as a percentage of total in that class	percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Sociètè Gènèralè SA (O2RNE8IBXP4R0TD8PU41)	17.43	17.34	-	-	0.00
UBS AG (BFM8T61CT2L1QCEMIK50)	9.72	14.12	-	-	0.00
Goldman Sachs International (W22LROWP2IHZNBB6K528)	5.75	10.82	-	-	0.00
J.P. Morgan Securities PLC (K6Q0W1PS1L104IQL9C32)	5.74	14.93	-	-	0.00
BARCLAYS BANK PLC (G5GSEF7VJP5I7OUK5573)	3.60	1.27	-	-	0.00

10. Equity Derivatives

Equity derivatives - Futures and options admitted to trading on a trading venue (listed) Equity derivatives - Swaps and other equity derivatives (over the counter)

Top 5 Venues - Placement

Class of Instrument

Equity Derivatives - Options and Futures admitted to trading on a trading venue

Notification if <1 average trade per business day in the previous year $\,$

No

Top 5 Venues ranking in terms of volume

(descending order)	Proportion of volume executed as a percentage of total in that class	percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Invesco Advisers, Inc. (037NHJVF7S22I10N0U83)	29.42	16.52	n/a	n/a	0.00
Goldman Sachs International (W22LROWP2IHZNBB6K528)	12.74	11.74	n/a	n/a	0.00
Merrill Lynch International (GGDZP1UYGU9STUHRDP48)	12.70	25.44	n/a	n/a	0.00
Morgan Stanley & Co. International PLC (4PQUHN3JPFGFNF3BB653)	11.16	9.23	n/a	n/a	0.00
UBS AG (BFM8T61CT2L1QCEMIK50)	9.63	14.78	n/a	n/a	0.00

Top 5 Venues - Placement

Class of Instrument

Equity Derivatives - Swaps and other equity derivatives

Notification if <1 average trade per business day in the previous year

No

(descending order)	Proportion of volume executed 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
Invesco Advisers, Inc. (037NHJVF7S22I10N0U83)	53.20	33.03	n/a	n/a	0.00

11. Currency Derivatives

Currency derivatives - Futures and options admitted to trading on a trading venue (listed) Currency derivatives - Swaps, forwards and other currency derivatives (over the counter)

The Execution Factors - Futures and options admitted to trading on a trading venue

When trading in listed instruments, 'speed of execution' has been the primary factor given the prevailing market price and explicit costs are equivalent across brokers, specifically for standard size orders. This is also the case where the market is volatile, where the objective is to quickly achieve a better price than would be obtained by executing over a period of time. In some instances, 'implicit cost' is prioritised to limit the market impact of larger size orders in the absence of volatility.

The Execution Factors - Swaps, forwards and other currency derivatives

We generally traded on the best 'price' basis asking multiple counterparties when the size was within the size manageable by the market participants for that trading day. For trades that were larger than the normal market size (prioritising 'size of order'), we looked for counterparties who had a natural opposing position that would enable them to take the risk without moving the market. Where a naturally opposing position was not found, we considered counterparties who would be able to distribute the risk efficiently through their franchise. In some instances, a combination of both 'price' and 'likelihood of execution' have been prioritised.

Close Links

There are no close links or conflicts of interest with any venue that we currently use for executing orders in this class of instrument.

Specific Arrangements

There are no specific arrangements concerning rebates or nonmonetary benefits with execution venues used to execute trades for this class of instrument.

Change in Execution Venues

There have been no changes to the execution venues for this class of financial instrument for the 2018 calendar year.

Order execution by client categorisation

With respect to order execution, IAML does not treat clients differently based on client categorisation. All execution decisions are made by the respective IAML trading desk who execute trades in line with the IAML Order Execution Policy.

Data and Tool Usage

IAML currently monitor and review venues used for execution. RTS 27 and 28 data is starting to be analysed but the analysis is still in its early days and as we are able to process the data more effectively in the future we will look to integrate the additional information into our execution process.

Consolidated Tape Provider

Consolidated tape providers were not providing a consolidated tape for this class of financial instrument for the 2018 calendar year. If this available, IAML will review the usefulness of the consolidated tape and will utilise it where it allows IAML to judge the quality of price received from various counterparties and aide in the benchmarking of brokers.

Top 5 Venues - Execution

Class of Instrument

Currency derivatives - Swaps, forwards, and other currency derivatives

Notification if <1 average trade per business day in the previous year No

Top 5 Venues ranking in terms of volume (descending order)

(descending order)	Proportion of volume executed 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
State Street Global Markets International Limited (FX Connect) (549300SQM0MRIF4HE647)	73.04	46.19	-	-	0.00

(descending order)	Proportion of volume executed as a percentage of total in that class	percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Goldman Sachs International (W22LROWP2IHZNBB6K528)	29.79	24.20	-	-	0.00
DEUTSCHE BANK AKTIENGESELLSCHAFT (7LTWFZYICNSX8D621K86)	18.28	12.68	-	-	0.00
BARCLAYS BANK PLC (G5GSEF7VJP5I7OUK5573)	14.54	14.03	-	-	0.00
J.P. Morgan Securities PLC (K6Q0W1PS1L104IQL9C32)	9.53	5.97	-	-	0.00
Natwest Markets Ltd (RR3QWICWWIPCS8A4S074)	7.11	4.60	-	-	0.00

11. Currency Derivatives

Currency derivatives - Futures and options admitted to trading on a trading venue (listed) Currency derivatives - Swaps, forwards and other currency derivatives (over the counter)

Top 5 Venues - Placement

Class of Instrument

Currency derivatives - Futures and options admitted to trading on a trading venue

Notification if <1 average trade per business day in the previous year $\,$

No

Top 5 Venues ranking in terms of volume

(descending order)	Proportion of volume executed as a percentage of total in that class	percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Merrill Lynch International (GGDZP1UYGU9STUHRDP48)	85.583	84.96	n/a	n/a	0.00
Morgan Stanley & Co. International PLC (4PQUHN3JPFGFNF3BB653)	6.259	9.22	n/a	n/a	0.00
BARCLAYS BANK PLC (G5GSEF7VJP5I7OUK5573)	5.238	2.27	n/a	n/a	0.00
DEUTSCHE BANK AKTIENGESELLSCHAFT (7LTWFZYICNSX8D621K86)	2.893	3.26	n/a	n/a	0.00
Citigroup Global Markets Limited (XKZZ2JZF41MRHTR1V493)	0.027	0.28	n/a	n/a	0.00

Top 5 Venues - Placement

Class of Instrument

Currency derivatives - Swaps, forwards, and other currency derivatives

Notification if <1 average trade per business day in the previous year $\ensuremath{\mathsf{N}}$

No

(descending order)	Proportion of volume executed 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
Invesco Advisers, Inc. (O37NHJVF7S22I1ONOU83)	5.28	3.31	n/a	n/a	0.00

12. Commodities Derivatives

Commodities derivatives - Futures and options admitted to trading on a trading venue (listed) Commodities derivatives - Other commodities derivatives (over the counter)

The Execution Factors

When trading in listed instruments, 'speed of execution' has been the primary factor given the prevailing market price and explicit costs are equivalent across brokers, specifically for standard size orders. This is also the case where the market is volatile, where the objective is to quickly achieve a better price than would be obtained by executing over a period of time. In some instances, 'implicit cost' is prioritised to limit the market impact of larger size orders in the absence of volatility.

Close Links

There are no close links or conflicts of interest with any venue that we currently use for executing orders in this class of instrument.

Specific Arrangements

There are no specific arrangements concerning rebates or nonmonetary benefits with execution venues used to execute trades for this class of instrument.

Change in Execution Venues

There have been no changes to the execution venues for this class of financial instrument for the 2018 calendar year.

Order execution by client categorisation

With respect to order execution, IAML does not treat clients differently based on client categorisation. All execution decisions are made by the respective IAML trading desk who execute trades in line with the IAML Order Execution Policy.

Data and Tool Usage

IAML currently monitor and review venues used for execution. RTS 27 and 28 data is starting to be analysed but the analysis is still in its early days and as we are able to process the data more effectively in the future we will look to integrate the additional information into our execution process.

Consolidated Tape Provider

Consolidated tape providers were not providing a consolidated tape for this class of financial instrument for the 2018 calendar year. If this becomes available, IAML will review the usefulness of the consolidated tape and will utilise it where it allows IAML to judge the quality of price received from various counterparties and aide in the benchmarking of brokers.

Top 5 Venues - Execution

Class of Instrument

Commodities Derivatives - Other commodities derivatives

Notification if <1 average trade per business day in the previous year Yes

(descending order)	Proportion of volume executed as a percentage of total in that class	percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
Macquarie Bank Limited (4ZHCHI4KYZG2WVRT8631)	1.309	4.30	-	-	0.00
BARCLAYS BANK PLC (G5GSEF7VJP5I7OUK5573)	0.798	0.54	-	-	0.00
Morgan Stanley & Co. International PLC (4PQUHN3JPFGFNF3BB653)	0.233	1.07	-	-	0.00
Canadian Imperial Bank of Commerce (2IGI19DL77OXOHC3ZE78)	0.098	0.54	-	-	0.00
BNP PARIBAS (ROMUWSFPU8MPRO8K5P83)	0.060	0.40	-	-	0.00

12. Commodities Derivatives

Commodities derivatives - Futures and options admitted to trading on a trading venue (listed) Commodities derivatives - Other commodities derivatives (over the counter)

Top 5 Venues - Placement

Class of Instrument

Commodities Derivatives - Options and Futures admitted to trading on a trading venue

Notification if <1 average trade per business day in the previous year

No

Top 5 Venues ranking in terms of volume

(descending order)	Proportion of volume executed 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
Goldman Sachs International (W22LROWP2IHZNBB6K528)	67.58	61.30	n/a	n/a	0.00
Macquarie Bank Limited (4ZHCHI4KYZG2WVRT8631)	32.42	38.70	n/a	n/a	0.00

Top 5 Venues - Placement

Class of Instrument

Commodities Derivatives - Other commodities derivatives

Notification if <1 average trade per business day in the previous year

No

(descending order)	Proportion of volume executed 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
Invesco Advisers, Inc. (O37NHJVF7S22I1ONOU83)	97.50	93.15	n/a	n/a	0.00

13. Structured Finance Instruments

The Execution Factors

As CLO's (Collateralised Loan Obligations) trade by appointment, 'price' is not immediately observable. The primary consideration therefore tends to be 'likelihood of execution'. Sometimes a competitive auction process is run to help establish clearing market levels (specifically where we want to trade multiple securities within a short timeframe). The primary consideration in these instances would be 'price'.

Close Links

There are no close links or conflicts of interest with any venue that we currently use for executing orders in this class of instrument.

Specific Arrangements

There are no specific arrangements concerning rebates or nonmonetary benefits with execution venues used to execute trades for this class of instrument.

Change in Execution Venues

There have been no changes to the execution venues for this class of financial instrument for the 2018 calendar year.

Order execution by client categorisation

With respect to order execution, IAML does not treat clients differently based on client categorisation. All execution decisions are made by the respective IAML trading desk who execute trades in line with the IAML Order Execution Policy.

Data and Tool Usage

IAML currently monitor and review venues used for execution. RTS 27 and 28 data is starting to be analysed but the analysis is still in its early days and as we are able to process the data more effectively in the future we will look to integrate the additional information into our execution process.

Consolidated Tape Provider

Consolidated tape providers were not providing a consolidated tape for this class of financial instrument for the 2018 calendar year. If this becomes available, IAML will review the usefulness of the consolidated tape and will utilise it where it allows IAML to judge the quality of price received from various counterparties and aide in the benchmarking of brokers.

Top 5 Venues - Execution

Class of Instrument

Structured finance instruments

Notification if <1 average trade per business day in the previous year

(descending order)	Proportion of volume executed 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
Citigroup Global Markets Limited (XKZZ2JZF41MRHTR1V493)	4.70	3.37	-	-	0.00
BARCLAYS BANK PLC (G5GSEF7VJP5I7OUK5573)	2.96	2.88	-	-	0.00
BNP Paribas Securities Corp. (RCNB6OTYUAMMP879YW96)	0.64	1.44	-	-	0.00

13. Structured Finance Instruments

Top 5 Venues - Placement

Class of Instrument

Structured finance instruments

Notification if <1 average trade per business day in the previous year

Yes

(descending order)	Proportion of volume executed 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
Invesco Advisers, Inc. (037NHJVF7S22I10NOU83)	91.70	92.31	n/a	n/a	0.00

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